



# Representations to Cheshire West and Chester Local Plan Issues and Options Consultation

In relation to:

Land at Parkgate Road, Chester

On behalf of Taylor Wimpey

August 2025

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# 1 INTRODUCTION

- 1.1 These representations have been prepared by Asteer Planning LLP (“Asteer”), on behalf of Taylor Wimpey in response to the Cheshire West and Chester (“CWaC”) Council Local Plan Issues and Options (Regulation 18) Consultation (“Issues and Options Consultation”), running from the 4<sup>th</sup> July 2025 until 29<sup>th</sup> August 2025. These representations have been prepared alongside overarching representations which have also been submitted by Taylor Wimpey, prepared by Lichfields (enclosed at **Appendix 2**).
- 1.2 The emerging Local Plan for CWaC provides a unique opportunity for the Borough to holistically plan for its strategic growth, including meeting its housing and employment needs, and to capitalise on its intrinsic strengths over the next Plan Period and beyond. By providing a suitable type, quality and supply of land that will meet the Borough’s identified needs, this Plan can ensure sustainable economic and social growth across Cheshire West and Chester over the next 25-30 years.
- 1.3 These representations provide a response to the Issues and Options Consultation in relation to land under Taylor Wimpey’s control at Parkgate Road (“the Site”), which is shown lined red below in Figure 1, and at **Appendix 1**. They seek to inform the emerging Local Plan spatial strategy, strategic policies and land allocations, by demonstrating the deliverability of the Site, which is identified as part of a potential housing growth option to the north of Chester under reference ‘CH04’ within the Issues and Options Consultation document. Taylor Wimpey fully supports the identification of the Site as a potential location for growth – which should be identified regardless of the chosen growth option – and is committed to demonstrating its deliverability and suitability for allocation as the emerging Local Plan is progressed.

## **About Taylor Wimpey**

- 1.4 Taylor Wimpey was founded in 2007 and are one of the UK’s largest housebuilders, delivering a wide range of sustainable new homes and communities across the country.
- 1.5 Taylor Wimpey has a proven and respected track record of delivering high-quality, sustainable developments across Cheshire West and Chester, with Kingsmoat Garden Village standing as a flagship example of our commitment to placemaking, community integration, and long-term stewardship.

1.6 Kingsmoat Garden Village exemplifies our ability to deliver large-scale, complex developments in close collaboration with local authorities, stakeholders, and residents. The scheme has been praised for its design-led approach, incorporating generous green infrastructure, accessible public open spaces, and a diverse mix of housing that meets local needs. Taylor Wimpey's delivery at Kingsmoat has demonstrated:

- Strong engagement with CWaC officers and consultees, ensuring alignment with local planning policy and strategic objectives;
- Timely and efficient build-out, with infrastructure and housing delivered to programme and to a high standard;
- Commitment to biodiversity and sustainability, including the integration of nature-friendly landscaping and support for initiatives such as Garden on a Roll.
- Positive community impact, with feedback from residents and stakeholders highlighting the quality of homes, layout and amenities.

1.7 Taylor Wimpey's approach is underpinned by our values of doing the right thing, collaborating with communities, and leaving a positive legacy. We are proud to be recognised as a 5-star builder, and our work at Kingsmoat Garden Village reflects our ambition to be a trusted development partner in Cheshire West and Chester.

1.8 Taylor Wimpey is working on behalf of the landowner to promote the land at Parkgate Road, Chester. Taylor Wimpey and the landowner are fully committed to supporting the Local Plan process and demonstrating the suitability of the entire site for development during the next Plan Period to meet the growth needs of CWaC and Chester.

### **Site Background**

1.9 The Site comprises approximately 24 hectares ("ha") of agricultural land, forming a natural and logical extension to the north of Blacon, Chester. The Site has clear defensible boundaries and is bound by residential development which forms the settlement of Chester to the south and south-west, by the A540 (Parkgate Road) and the Shropshire Union Canal to the north and east, by the Mollington Banastre Hotel and Spa to the north. There is also an existing strong landscape framework with agricultural land

beyond to the north-west. The Site would form a rounding off of the Chester Settlement. A Site Location Plan is enclosed at **Appendix 1** and provided at Figure 1 below.

*Figure 1: Approximate Site Location Plan*



1.10 The remainder of this submission provides:

2. **Comments on the Issues and Options Plan:** comments on the potential growth strategy options and suggested policy approaches, in relation to the Site;
3. **A Deliverable Site:** an assessment of the Site context, Site surroundings and accessibility / sustainability; and a summary of the deliverability of the Site and its key benefits;
4. **Conclusions and Recommendations:** conclusions and recommendations on the Issues and Options Consultation and forward spatial strategy for CWaC's Local Plan.

1.11 Taylor Wimpey has assembled a professional design and technical team to prepare a deliverable and landscape-led masterplan that will underpin the deliverability of the Site and demonstrate that the Site is available, suitable and achievable to support a

residential development that will help to meet the needs of the Borough over the next Plan Period.

- 1.12 Taylor Wimpey would welcome ongoing engagement with the Council as the consultation responses are considered and the preparation of the new Local Plan is progressed. Taylor Wimpey would be happy to discuss any feedback in relation to these representations, or in relation to the Site specifically.

## **2 COMMENTS ON THE ISSUES AND OPTIONS LOCAL PLAN**

- 2.1 This section provides comments on the emerging spatial strategy, strategic policies and land allocations in the Issues and Options plan, as they relate to the national policy context.

### **National Policy Context**

- 2.2 On 12<sup>th</sup> December 2024, a new National Planning Policy Framework (“NPPF” or “the Framework”) was published, with immediate effect. This builds on the Government’s housebuilding and delivery manifesto pledges, and seeks to support the delivery of land and sites across the country.

### **Housing Requirement**

- 2.3 The new NPPF includes significant changes with regards to housing need and housing delivery. Alongside the new NPPF were changes to the calculation of the standard method which resulted in CWaC’s housing need rising from 532 dwellings per year (using the previous Government standard method), to a mandatory 1,928 dwellings per year (using the new standard method) – an increase of 1,382 dwellings per year. The new Local Housing Need (“LHN”) is applied with immediate effect to both CWaC’s five year housing land supply (“5YHLS”) (as the adopted Local Plan is more than 5 years old) and as a minimum requirement in plan-making – as has been proposed by the Council in the Local Plan Issues and Options.
- 2.4 This significant increase in CWaC’s housing requirement requires a pragmatic and proactive approach to growth, which should be focussed sequentially around the Borough’s settlements based on their scale, status and role, led by the City of Chester which is the Borough’s largest settlement and main urban centre.
- 2.5 Taylor Wimpey, as part of a Consortium, commissioned Lichfields to prepare a research paper which helps to inform the Council’s early decision making on its overall spatial strategy for its new Local Plan, particularly with regards to the scale of housing required to meet its needs, as well as economic and social objectives. This is enclosed at **Appendix 3**.

### **Five-Year Housing Land Supply (“5YHLS”)**

- 2.6 As set out above, the 5YHLS is calculated based on the new standard method requirement (1,928 dpa). As a result, according to CWaC’s Housing Land Monitor Summary Report 2025, the Council has a five-year housing land supply position of 1.89 years. As such the Borough is likely to be subject to speculative applications until the new Local Plan is adopted or a 5YHLS can be demonstrated.

### **Green Belt / Grey Belt**

- 2.7 The new NPPF also introduced circumstances where the development of homes may not be regarded as “inappropriate”. A review of the Site against the criteria is included later in this section, demonstrating that the redevelopment of the Site would not be “inappropriate development”, having regard to Paragraph 155 of the NPPF.

### **Comments on Key Topic Questions**

#### **Suggested Policy Approach SS 4 – Settlement Hierarchy**

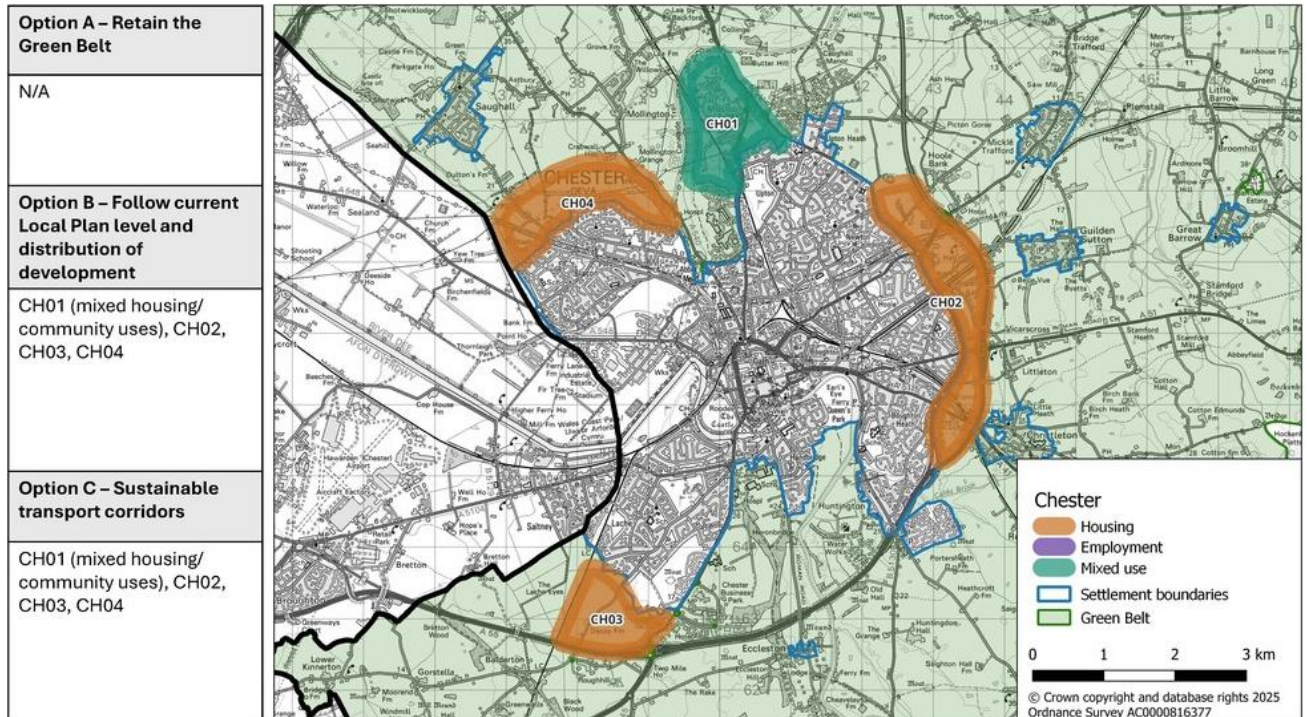
*Question SS 5: Do you agree with the suggested policy approach towards the settlement hierarchy, as set out in SS 4 ‘Settlement Hierarchy’? If not please suggest how it could be amended.*

- 2.8 The Policy Approach to SS 4 ‘Settlement Hierarchy’ designates Chester at the top of the settlement hierarchy as the only ‘City’ within the Borough (Tier 1). Policy Approach SS 4 outlines that an individual place-based policy for each settlement will set out the vision, core features, key issues and a clear strategy for what development will take place in each settlement.
- 2.9 Taylor Wimpey fully supports the designation of Chester as a City at Tier 1 of the settlement hierarchy along with the policy approach to having an individual policy for Chester to enable a strategy for sustainable growth in the settlement to be considered. As the only City in the Borough, it is considered that Chester should accommodate a level of development and growth that reflects its scale, location and sustainability, which should be reflected in the spatial strategy and land allocations in the emerging Local Plan.

## Suggested Policy Approach SS 5 – Spatial Strategy Options

2.10 The Site at Parkgate Road is identified as part of a wider potential growth option, as reference 'CH04', in Options B and C, as illustrated below in Figure 2:

**Figure 2: Chester Potential Growth Locations**



2.11 Taylor Wimpey consider that Policy Approach SS 5 should identify Green Belt release around Chester (as the Borough’s main settlement) in all potential Growth Options, because exceptional circumstances exist to amend the Green Belt boundary.

### Exceptional Circumstances for Amending the Green Belt Boundary

2.12 Paragraph 145 of the NPPF states *“Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans”*. Paragraph 146 continues, *“Exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means. If that is the case, authorities should review Green Belt boundaries in accordance with the policies in this Framework”*.

2.13 In accordance with Paragraph 146, CWaC are unable to meet their identified need for homes, with the most recent 5YHLS position at 1.89 years according to the Housing Land

Monitor Update 2025. Additionally, CWaC's housing requirement has increased significantly from the previous Local Plan from 1,100 dpa to 1,928 dpa, which is a substantial uplift in the number of new homes that CWaC need to plan for.

- 2.14 Policy SS 5 cites the Examiners Report into the Local Plan (Part One) as potential justification for the retention of the Green Belt around Chester. Given the significant increase in housing need for the Borough and the wider aspirations of the Issues and Options proposals (being to achieve economic and social growth, with the City of Chester acting as the catalyst), the context against which the Examiner made their conclusions in 2014 has significantly and materially changed to the extent that these comments should not be considered in the production of Policy SS 5. This changed context includes the significantly increased housing requirement covered above, and also that a significant amount of Previously Developed Land ("PDL") has been developed since the last Local Plan, resulting in a need for development on sustainable greenfield locations to meet identified housing needs.
- 2.15 Paragraph 148 of the NPPF (2024) is clear that, where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt land which is not previously developed, then other Green Belt locations. A site-specific Green Belt assessment is provided below. It is concluded that the Site does not contribute strongly to any of the Green Belt purposes, and that the redevelopment of the Site for housing would not be inappropriate development in the Green Belt having regard to Paragraph 155 of the NPPF (2024).

### **Green Belt Assessment**

- 2.16 Approximately 41% of the Borough is designated as Green Belt with Chester, Ellesmere Port and Northwich either entirely enclosed or partially defined by the Green Belt. This results in the Borough being very constrained in terms of future growth outside of settlement boundaries, particularly in the northern areas of the Borough where there is strong market demand for housing growth but significant Green Belt constraints. There is, therefore, a need to release some sites from the Green Belt to meet development requirements, including housing needs.
- 2.17 The Site is currently designated as Green Belt land and sits directly adjacent to the defined settlement edge of Chester. Release of the Site for development would require

redefinition of the Green Belt boundary but this can be done in a manner that would not undermine or threaten the purposes of the Green Belt in CWaC or in this location.

- 2.18 An assessment of the Site against the five purposes of the Green Belt has been undertaken below. Each purpose, as per Paragraph 143 of the NPPF, is considered in turn.

***Purpose A – To check the unrestricted sprawl of large built-up areas***

- 2.19 The Site would form a logical extension to the northern edge of Chester and its development would not represent unrestricted sprawl.

- 2.20 The Site benefits from strong and durable boundaries which help to enclose the Site, including existing built form to the north, east, south and west and a strong landscape framework to the north-west. The existing residential area of Blacon bounds the Site to the south and west. The A540 (Parkgate Road) and the Shropshire Union Canal provide the northern and eastern boundaries to the Site, whilst the Mollington Banastre Hotel and Spa adjoins the Site to the north. Therefore, the Site is subject to urbanising influences and has physical features in reasonable proximity that would restrict and contain development. Furthermore, Taylor Wimpey intends to further strengthen the existing landscape buffer along the north western boundary as part of any development proposals for the Site.

- 2.21 The release of this Site from the Green Belt would also present the opportunity to redefine and strengthen the Green Belt boundary in this area. As per NPPF Paragraph 149, when defining Green Belt boundaries, Local Plans should define boundaries clearly, using physical features that are readily recognisable and likely to be permanent. The release of this site from the Green Belt, with strong boundaries provided by Parkgate Road, the Shropshire Union Canal, existing residential dwellings, the Mollington Banastre Hotel, provides opportunities to achieve this requirement.

***Purpose B – To prevent neighbouring towns merging into one another***

- 2.22 The Planning Practice Guidance (“PPG”) on Green Belt makes it clear that this purpose relates to the merging of towns, not villages. The nearest town to the Site is Ellesmere Port which lies around 5km north of the Site. The Site forms a small part of the gap

between Chester and Ellesmere Port and does not make a contribution to the visual separation of the towns. The next nearest town is Neston, which is around 12km north west of Chester and connected by the A540 (Parkgate Road). Given the significance distance between the towns, the development of the site will have no impact on the potential for them to merge together. Therefore, the Site is not important in preventing any neighbouring towns merging into one another, and thus, the release of this site from the Green Belt would not lead to the coalescence of Chester with any other settlements.

***Purpose C – To assist in safeguarding the countryside from encroachment***

2.23 As detailed above, the Site benefits from strong and durable boundaries which help to enclose the Site, including existing built form and a strong landscape framework.

2.24 The Site is largely contained by Parkgate Road to the north, the Shropshire Union Canal to the east and existing residential development to the south. There is an existing strong landscape framework to the north west, which can be enhanced further as part of the proposed development of the Site. The Site will have a very limited degree of impact on openness when considered in the context of the wider Green Belt. Therefore, the Site does not provide a strong contribution to this purpose of the Green Belt.

***Purpose D – To preserve the setting and special character of historic towns***

2.25 This purpose relates to the City of Chester as a historic town. The CWaC Local Plan Part 2 identifies the intersection between Parkgate Road and the Shropshire Union Canal as a key view into the City of Chester. This also requires all development proposals to protect the historic city core and its setting, including the appearance of development along radial roads and the Shropshire Union Canal which are important to the character of the city. Therefore, it is important to consider the impact any development proposals on the Site will have on the setting and character of Chester as a historic town.

2.26 The Site's topography means that the most prominent views towards Chester's skyline are from Parkgate Road and the northern sections of the Site, whereas towards the south of the Site (closest to the existing residential dwellings), the Chester skyline is no longer visible. Taylor Wimpey intend to bring forward a sensitive and sympathetic scheme which respects the key views into the City, focussing development on the sections of the Site which have a minimal to no impact. Taylor Wimpey have engaged specialist

landscape and visual impact consultants along with heritage specialists to inform a carefully designed scheme that will ensure that any views are maintained.

- 2.27 Therefore, it is considered that subject to sensitive masterplanning, utilising the existing levels across the Site and focussing development towards the south-western areas of the Site, the Site does not provide a strong contribution to this purpose.

***Purpose E – To assist in urban regeneration, by encouraging the recycling of derelict and other urban land***

- 2.28 National planning policy is clear that there is a brownfield first approach to development. This is well enshrined in Green Belt policy, with NPPF Paragraph 147 making it clear that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, Councils must demonstrate that they have fully examined all other reasonable options (including making as much use as possible of suitable brownfield sites and underutilised land). That being said, the Borough's emerging development requirements are substantial and Green Belt constrains growth in the northern areas of the Borough. There is, therefore, a need to release suitable sites from the Green Belt to meet CWaC's significant housing requirements, and as part of a strategy which assists and sits alongside brownfield development rather than hindering it.
- 2.29 In summary, the development of the Site would not detract from any strategy to assist in urban regeneration.

**Assessment Against Paragraph 155 of the NPPF**

- 2.30 Paragraph 155 of the NPPF considers the circumstances in which the development of homes, commercial and other development in the Green Belt should not be regarded as "inappropriate". This includes consideration of whether sites meet the definition of Grey Belt (which is applicable for both plan-making and decision-taking). It states that sites should not be considered "inappropriate" development in the Green Belt where all of the following apply:

- a) *"The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*
- b) *There is a demonstrable unmet need for the type of development proposed(56);*

c) *The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework(57); and,*

d) *Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157”.*

2.31 An assessment against criteria a) to d) of paragraph 155 of the NPPF is undertaken below:

**Criterion a)**

2.32 There are two parts to criterion a) of paragraph 155 of the NPPF which must be demonstrated:

1. The development would utilise grey belt land; and,
2. The development would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan.

2.33 The definition of Grey Belt at Annex 2 (Glossary) of the NPPF is as follows:

*“For the purposes of plan-making and decision-making, ‘grey belt’ is defined 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.”*

2.34 The Site is not covered by the areas or assets detailed in Footnote 7 (other than Green Belt) and, as detailed above, the Site does not strongly contribute to purposes a), b) or d) in paragraph 143 of the NPPF. Therefore, the Site is ‘Grey Belt’. Furthermore, as demonstrated within the site-specific Green Belt assessment, the proposed development would ensure that it would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan.

**Criteria b), c) and d)**

2.35 Regarding the other criteria of paragraph 155:

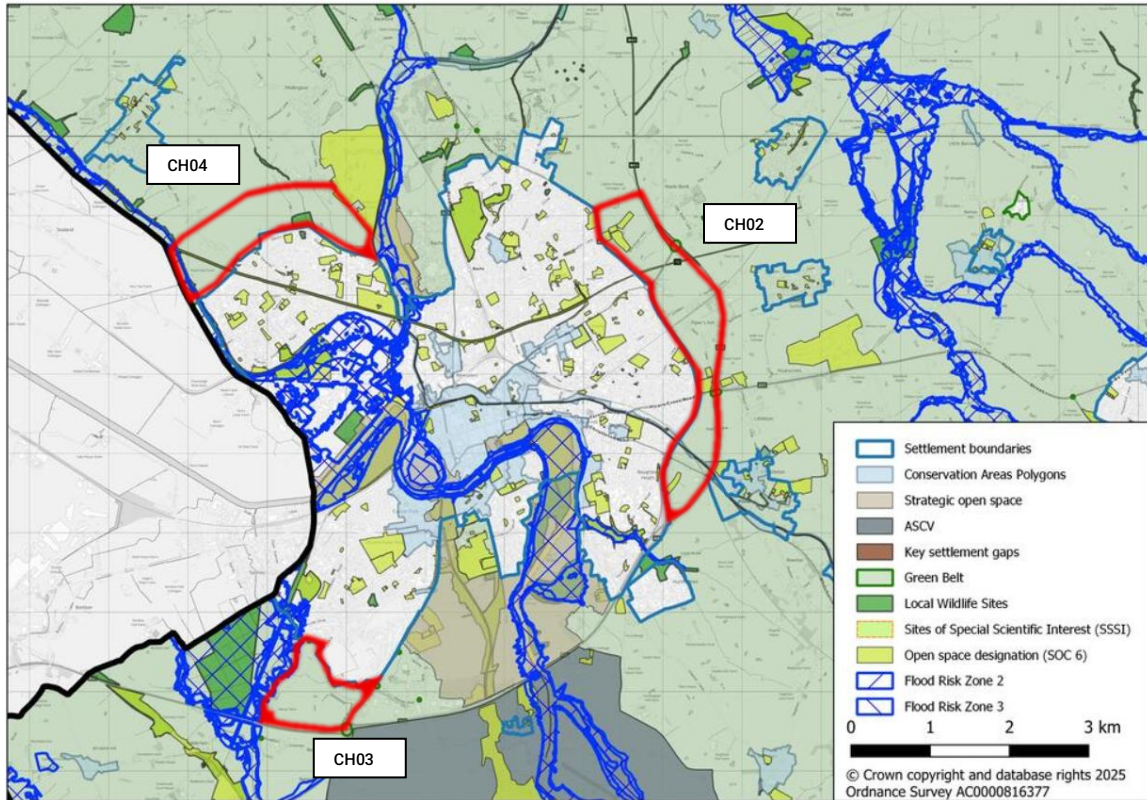
- **(b) Demonstrable Need** – There is an immediate demonstrable need for housing in CWaC, as CWaC do not have a five-year supply of deliverable housing sites (1.89 years). Therefore, there is a demonstrable unmet need for housing.
- **(c) Sustainable Location** – As detailed within Section 3 of this Document, and in the context of paragraphs 110 and 115 of the NPPF, the Site is accessible by sustainable modes of transport and the surrounding area benefits from good pedestrian and cycle infrastructure, with a number of amenities available locally. Additionally, there are opportunities for travel by public transport, which are within an acceptable walking distance of the Site. Therefore, the development would be in a sustainable location.
- **(d) Golden Rules** – Taylor Wimpey would ensure that the development meets the ‘Golden Rules’ requirements set out in paragraphs 156 and 157 in terms of affordable housing, necessary improvements to local infrastructure, and the provision of accessible areas of public open space on site.

2.36 Therefore, the proposed development would not be inappropriate development in the Green Belt having regard to paragraph 155 of the NPPF.

#### **Potential Growth Options for Chester**

2.37 The Site is also without major constraints when considering the major physical and policy constraints on Chester’s settlement edge. Figure 3 identifies the growth locations in the context of the Chester Constraints Map at Figure 6.1 of the Issues and Options Consultation.

**Figure 3: Constraints and Proposed Residential Growth Locations**



- 2.38 Based on the above, Taylor Wimpey consider that CH04 represents the most appropriate and least constrained option to promote a sustainable pattern of development when considered in the context of alternative growth locations.
- 2.39 Taylor Wimpey consider that to meet the Borough’s significant housing need, CH04 should be identified as a key strategic site, as it forms the most logical and appropriate location to amend the settlement boundary. Taylor Wimpey’s comments on each current growth option is provided below.

***Spatial Strategy – Option A***

- 2.40 Option A seeks to retain the Green Belt, by focussing development on settlements without Green Belt constraints. Therefore, Option A proposes no potential growth areas for housing or employment for Chester as the settlement is surrounded by Green Belt. This is considered to be in conflict with other policies across the Plan, which identify Chester as the only City within the Borough, at the top of the settlement hierarchy. As such, it is considered that Chester should accommodate a proportionate level of growth under any spatial strategy to reflect its role as the Borough’s main settlement in terms

of population and dwellings, and as the main centre for employment, culture, retail, leisure, higher education, tourism and its role as a sub-regional transport hub.

### ***Spatial Strategy – Option B***

- 2.41 Option B seeks to follow the Local Plan level and distribution of development with reference to the settlement hierarchy, by locating most new development on the edge of main urban areas or around smaller settlements which have adequate services, facilities and access to public transport. The Site is identified as a potential location for housing growth within this Option under 'CH04'.
- 2.42 Option B recognises that *“a key difference between the Local Plan (Part One) and the new Local Plan is that there is a much more limited supply of previously developed land to accommodate new development, and unlike the last plan, larger areas of Green Belt and/or countryside are likely to be needed”*. This is even more pertinent given the significance increase in CWaC's housing requirement, which has increased from 1,100 dpa in the last local plan to 1,928 dpa. Taylor Wimpey welcomes this recognition and considers that any growth strategy that follows Option B should reflect this situation and attribute a level of growth to Chester that reflects its status as the main urban area and a key focus for growth in the adopted Local Plan.
- 2.43 To follow the level and distribution of development within the adopted Local Plan, Chester should accommodate a higher level of growth than is attributed within proposed Option B. Within the adopted Local Plan, Chester had a requirement of 5,200 homes out of the total Borough requirement of 22,000 which equates to 24%. Within Option B, an unspecified 5,000+ homes figure is proposed for Chester. In order to maintain the level and distribution of development (24% of dwellings in Chester) against the current requirement figure (of 28,710 homes), at least 6,760 homes would need to be delivered across Chester. This would be achievable through the allocation of this Site and would ensure sustainable growth that does not conflict with the other policies within the Plan.
- 2.44 Therefore, Taylor Wimpey strongly considers that the Site at Parkgate Road should be identified for accommodating housing growth within Option B, as a deliverable and sustainable Site in Chester to meet the local housing needs.

### ***Spatial Strategy – Option C***

- 2.45 Option C seeks to focus development around settlements on the railway network or main bus route corridors. This identifies housing growth in Chester for around 3,000 – 5,000 homes. The Site is identified as a potential location for housing growth within this option under 'CH04'.
- 2.46 Taylor Wimpey supports Option C and reiterates that Chester is the most sustainable settlement within the Borough for growth, as reflected by the designation at the top of the settlement hierarchy. The City is the main centre for employment, leisure and transport connections and therefore should accommodate an appropriate level of growth to reflect this.
- 2.47 The Site at Parkgate Road lies around 2km north of the city centre of Chester, and has direct access to the main bus routes (via Parkgate Road (A540) and the most immediate access to the rail networks (via Bache Station) of any of the City's potential growth areas. The Site would therefore provide a logical extension to the settlement and a sustainable pattern of development that supports a level of growth to Chester that will ensure its future vitality.

*Question SS 23: Which of the identified potential growth areas around Chester do you consider to be the most suitable?*

*Question SS 24: Do you have any further comments about any of the potential growth areas identified around Chester?*

- 2.48 For the reasons set out above Taylor Wimpey consider that **land at Parkgate Road as part of growth location CH04 represents a very suitable and deliverable location for growth in Chester**. The Site forms a logical and sustainable extension to the settlement of Chester, it does not meet any of the purposes of the Green Belt and is wholly deliverable, with no constraints that would prevent it delivering homes early in the Plan Period, as demonstrated in Section 3 of this document.
- 2.49 Taylor Wimpey consider that **the Site should be considered as a crucial element of the emerging Local Plan's deliverable supply under any growth option that is pursued**.

## **Suggested Policy Approach CH 1: Chester**

***Question CH1:** Do you agree with the suggested policy approach towards Chester, as set out in CH 1 'Chester'? If not, please suggest how it could be amended?*

***Question CH 2:** Do you have any comments on the suggested allocations / sites?*

- 2.50 The suggested Policy Approach to CH 1 is to update and combine the existing Local Plan Part 1 STRAT 3 Policy with Part 2 Policy CH 1, as the overarching and locally distinct policy for Chester, but updated as needed to reflect the allocations that have been completed and/or require a new approach.
- 2.51 The explanatory text identifies Chester as having the best levels and opportunities for public transport use, walking and wheeling, across the Borough. Therefore, the new Local Plan will seek to increase housing with a focus on a connected centre surrounded by accessible neighbourhoods.. The approach will prioritise the protection of the historic environment as core to protecting the character of the city that makes it a special and highly valued place.
- 2.52 Taylor Wimpey supports the suggested Policy Approach CH 1 in having an overarching and locally distinct policy which sets out the allocations within the settlement. This will enable more strategic growth to be identified that can meet housing and employment needs within the settlement.
- 2.53 Considering the significant increase in CWaC's housing requirement from 1,100 dpa in the last Local Plan to 1,928 dpa, Taylor Wimpey consider that there is a clear need to review the Green Belt boundary in Chester (even if Growth Option A 'Retain the Green Belt' is the chosen Option for the rest of the Borough), and that deliverable urban extensions are required to ensure that deliverable sites are identified to support the significant growth needs of Chester, and to ensure that any under-delivery of the City's regeneration sites can be countered by sites that can support delivery early in the Plan Period.
- 2.54 It is considered that land at Parkgate Road should be identified as a residential growth location within Policy CH 1 'Chester', as it is a sustainable urban extension that can meet the housing needs of the Borough in the early part of the Plan Period. The deliverability of the Site is set out in Section 3 and demonstrates the Site's ability to support the

suggested Policy CH1 approach by providing direct sustainable travel options via both road and rail. Taylor Wimpey strongly consider that the Site should be considered as a suitable and deliverable site allocation for Growth Options A, B and C, providing an opportunity to support an urban extension that can deliver housing early in the Plan Period.

***Question CH 3: Do you have any views on how the aspirations of the One City Plan and Chester Regeneration Framework should be reflected through the new Local Plan?***

2.55 The One City Plan (2022-2045) aims to give a sense of direction for the future growth of Chester City Centre, based on four key themes: city experience and play; connectivity and accessibility; thriving people and communities; and business friendly economy and skills. The Chester City Gateway Strategic Regeneration Framework (“SRF”) sets out a 10 year vision for the area around the Chester Railway Station, to drive the regeneration of Chester City Centre. Both of these documents recognise the clear need to increase the number of residents in Chester and ensuring that the residential offer is both sustainable and diverse to meet the needs of all age groups.

2.56 Taylor Wimpey is supportive of any proposals to carry through the aspirations of both the One City Plan and the SRF in the new Local Plan and considers that the development of the Site at Parkgate Road would support in the delivery of these aspirations, by providing a significant boost to Chester’s supply of high-quality market and affordable homes on the immediate edge of the settlement while offering directly accessible sustainable travel options into the City Centre – including via rail as a result of the Site’s proximity to the Bache Railway Station. The delivery of new homes in this location will allow key workers to remain in the city, retaining talent that can support the economic development of the city, as highlighted as a key priority in the One City Plan.

### **Suggested Policy Approach HO 2: Delivering Affordable Housing**

***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?***

2.57 Taylor Wimpey supports the suggested Policy Approach towards delivering affordable housing, as set out in ‘HO 2’, which sets out the requirement to provide affordable housing on all new developments that include the provision of new homes, unless there

are exceptional circumstances. However the Council should ensure that any affordable housing requirements are evidenced as viable through an assessment and that flexibility is provided within the policy where viability may be an issue.

2.58 The delivery of available and achievable housing developments, such as at Parkgate Road, provide the most effective way to deliver affordable housing along with the delivery of a mix of housing types to meet local needs. The provision of greater quantities of market housing will also help to alleviate the constraints on supply, and in turn help to

Comments on Spatial Strategy and Potential Growth Options.

### **Summary**

2.59 In summary, Taylor Wimpey consider that land at Parkgate Road and location CH04 represents a very suitable and deliverable location for a sensitive urban extension in Chester, and should be identified as a key location for growth under Option A, B and C, for the following reasons:

- The Site offers a deliverable option on the edge of Chester which is well-contained with clear, defensible boundaries and represents a rounding off of the Chester Settlement.
- Chester is identified as the only City within the Borough, at the top of the Settlement Hierarchy. As such, Chester should accommodate a proportionate level of growth to reflect its role as the principal settlement within CWaC and make effective use of the existing public transport infrastructure and availability of services and facilities.
- There is a clear difference in approach between the emerging Local Plan and the previous Local Plan due to a significant shift in context, including an increase in housing requirement from 532 dpa (previous LHN) and 1,100 dpa (adopted Local Plan requirement) to 1,928 dpa (current LHN), along with a reduction in available PDL land.
- The exceptional circumstances for Green Belt release exist in CWaC and have been set out earlier in this section.

- The Site does not strongly contribute to any purposes of the Green Belt and constitutes 'Grey Belt' land where its development would not be considered "inappropriate" in accordance with Paragraph 155 of the NPPF.
- The Site is wholly deliverable and suitable for development for housing, as set out in more detail in the following section.

### **3 PARKGATE ROAD: A DELIVERABLE SITE**

#### **The Site and Its Surroundings**

- 3.1 The Site comprises approximately 24 hectares (“ha”) of agricultural land, forming a natural and logical extension to the north of Blacon, Chester. The Site is bound by residential development which forms the city of Chester to the south and south-west, by the the A540 (Parkgate Road) and the Shropshire Union Canal to the north and east, and by further agricultural land to the north-west. Immediately to the north of the Site is the Mollington Banastre Hotel and Spa which adjoins the Site boundary.

#### **Technical and Environmental Considerations**

##### ***Accessibility and & Highways***

- 3.2 The Site is in a sustainable location with the opportunity to provide strong links into the existing adjacent residential area and provide new footpaths into Blacon, along Parkgate Road and along the Shropshire Union Canal. There are also a range of services and facilities in close proximity, including:

- Convenience shopping (Morrisons Daily c. 500m; Spar Blacon c. 800m);
- Schools (Saint Theresa’s Catholic Primary School c. 400m; The Arches Community Primary School c. 800m; Blacon High School c. 1.7km);
- Post office (Blacon Post office c. 800m);
- Sports facilities (King George V Community Sports Hub c. 700m; Blacon Pump Track c. 500m; Canterbury Road Playing Field c. 750m; Blacon Youth Football Club c. 1.3km);
- Nurseries / Children’s centres (Busy Bees Chester Hopscotch c. 750m; S4YC Blacon Nursery c. 800m; Blacon Children’s Centre c. 800m);
- Pubs (Little Owl c. 1km; The Mill at Upton c. 1.2km; Waggon and Horses 1.5km);
- Hot food takeaways (Bhajis Takeaway c. 800m; Georges Fish & Chips c. 800m);
- Cafes and Restaurants (Chatwins c. 800m);
- Pharmacy / Chemist (Swettenham Chemists c. 800m);

- Hairdresser (Hair Parade Beauty & Aesthetics c. 800m; Hairtology Turkish Barbers c. 1.6km);
- Religious Buildings (St Columba and St Theresa Church c. 500m).

3.3 The City Centre of Chester is only around 2km to the south of the Site, providing a vast range of services and facilities. The number 22 and 15 bus services are also available within around 400m on Parkgate Road and Shelley Road (approximately 5 minutes' walk) with services to Chester City Centre.

3.4 Detailed highways assessment work will be progressed to understand the design of a future access from Parkgate Road and to understand how any impacts on highways capacity can be appropriately mitigated as the Local Plan is progressed.

#### ***Ecology and Trees***

3.5 There are no statutory ecological designations on the Site and given the agricultural use of the Site, the majority of habitats are common and only of local value. Opportunities for ecological enhancement will be taken as part of any future development to deliver Biodiversity Net Gain of at least (if not in excess of) 10%.

#### ***Heritage***

3.6 There are no statutory heritage designations within the Site. Taylor Wimpey will engage professional heritage consultants to understand the value and significance of any proximate assets and if any mitigation is required to ensure that any development does not have an adverse impact.

#### ***Flood Risk and Drainage***

3.7 The significant majority of the Site is located within Flood Zone 1, which has the lowest risk of flooding. The southern boundary of the Site is within Flood Zone 2 and 3. There are limited areas of surface water flooding, which follow the southern boundary and bisects the north-west corner of the Site. Taylor Wimpey will engage specialist Flood Risk consultants to assist in preparing development proposals which avoid areas of flood risk and ensure a suitable drainage strategy is prepared.

### ***Public Rights of Way***

- 3.8 There are no Public Rights of Way (“PRoW”) within the Site. There are several PRoWs in close proximity to the Site. The first is the Mollington FP11 which goes from Parkgate Road eastwards to Upton. There are also several PRoWs within the residential neighbourhood to the south of the Site. There may be an opportunity to connect into these existing public footpaths as part of the layout for the Site.

### **Deliverability**

- 3.9 The NPPF seeks to ensure that deliverable sites are provided in appropriate locations to meet housing needs and support economic growth. To be considered deliverable, sites should be available, suitable, and achievable and should be available to be brought forward within a realistic timeframe once a Local Plan is adopted.
- 3.10 Taylor Wimpey is fully committed to the Site and consider that it could be brought forward immediately on allocation, or earlier if an acute need is established, to meet the housing and employment needs of the Borough.

### **Available**

- 3.11 Taylor Wimpey has entered into an agreement with the landowner to promote the Site for residential development. Taylor Wimpey have a proven track record of delivering high-quality housing developments on suitable and sustainable sites and can confirm that the Site is capable of delivering housing within the early phases of the Local Plan period.

### **Suitable**

- 3.12 The Site is entirely suitable for a residential development for the following reasons:
- It is a logical and natural extension to Chester that would deliver a sensitive extension to the residential area to accommodate the required housing growth.
  - It offers an accessible and sustainable location for development that would support a balanced spatial strategy and which could be brought forward early in the plan period following any allocation.
  - There are no environmental or technical constraints that would prevent the development of the Site, subject to suitable mitigation and a sensitive approach to design.

- It offers the potential for significant accessibility and biodiversity improvements to the countryside.

### **Achievable**

- 3.13 An assessment of the Site constraints illustrate that delivery of the Site is achievable, and a professional team of technical experts are being engaged with to support the detailed design of the Site moving forward.
- 3.14 Taylor Wimpey has reviewed the economic viability of the scheme in terms of the land value, attractiveness of the locality, level of potential market demand and projected rate of sales in Chester; as well as the cost factors associated with the Site including site preparation costs and site constraints. Taylor Wimpey confirms that the development of the Site is economically viable, deliverable and achievable in accordance with the NPPF.

### **Key Benefits**

- 3.15 The development of the Site will support new housing in an appropriate location and ensure that a quantity, quality and mix is provided that supports economic growth in Chester and the west of the CWaC Borough. The delivery of the Site will provide significant benefits to the Borough, to Chester and the existing community. These are summarised as follows:

#### ***Economic Benefits***

- 3.16 The development of the Site will have significant economic benefits, including:
- Generating investment during the construction phase of development through construction cost, Full Time Equivalent (“FTE”) construction jobs and an increase in Gross Value Added (“GVA”). The scheme will generate construction investment and sustain construction jobs for the length of the construction programme, offering a recognised pathway into employment for registered unemployed residents in CWaC.
  - Providing long term occupation benefits including new resident expenditure, attracting new and high earning residents to Chester, generating flow on and supported jobs and, overall, generating increased economic output in the Borough.
  - Generating significant revenue for the Local Authority, with a development of new homes generating significant annual Council Tax revenue, and a New Homes Bonus.

- Providing the quality of housing that will underpin the retention of skilled workers in Chester and support high value jobs in knowledge-led industries.

### ***Creating Social Benefits and Social Inclusion***

3.17 The delivery of the Site will have clear social benefits for existing and future residents, by providing greater choice for housing and amenities, improving access to amenities and meeting a variety of identified housing needs. The key social benefits include:

- Delivering high quality market homes to meet the needs of the Borough's existing and future employees.
- Delivering viable and deliverable affordable homes to address the Borough's acute affordability crisis and support the housing of key workers and first time buyers.
- Providing new residents to sustain demand for good quality public services and local social infrastructure in Blacon and Chester.

### ***Environmental Benefits***

3.18 The Site is currently arable farmland with limited biodiversity or recreational value. The development of the Site has the potential to significantly uplift the biodiversity, accessibility and overall enjoyment and environmental value of the Site. Key environmental benefits include:

- The Site is extensively farmed and has limited ecology value at present, which provides an opportunity to create new habitats for a range of species and deliver an uplift in biodiversity to meet Government targets.
- The protection and enhancement of existing features on the Site that add value, including mature trees, hedgerows on the Site boundary.
- Exploring the potential for improved accessibility to the Green Belt and biodiversity enhancements to the wider site.
- Embedding energy efficiency and zero carbon ready by design into the fabric of the development, and employing cutting edge new net zero technologies, including the Future Homes Standard.

## 4 CONCLUSIONS AND RECOMMENDATIONS

4.1 In summary, Taylor Wimpey fully supports the identification of the Parkgate Road site as part of growth area CH04 in the Local Plan Issues and Options Consultation. Taylor Wimpey strongly supports the principle of allocating of the Site within the emerging Local Plan and, as demonstrated in these representations, and is fully committed to bringing forward the Site for development.

4.2 In summary, Taylor Wimpey consider that:

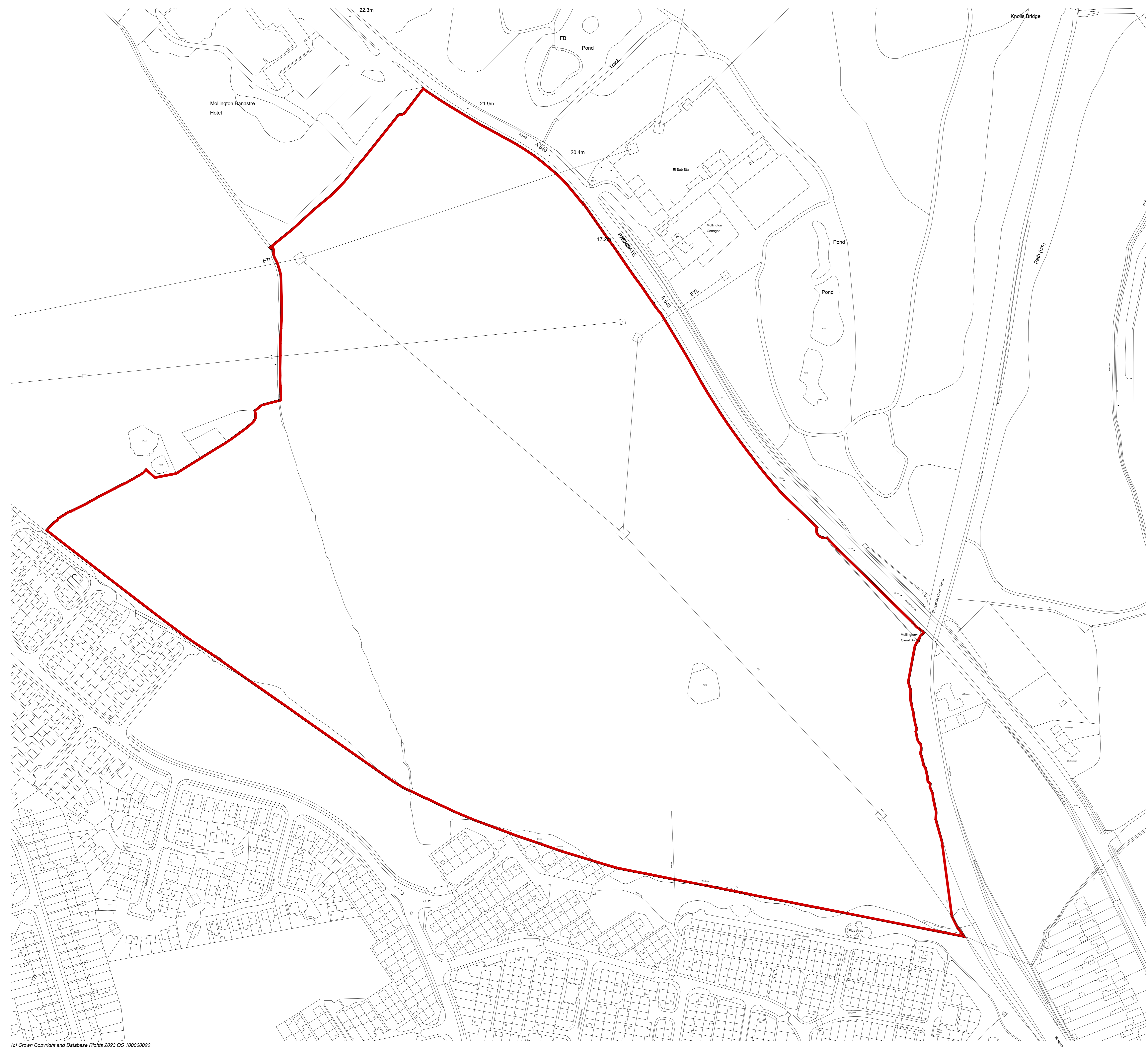
- The Site offers a logical and deliverable option for growth on the edge of Chester which is well-contained with clear, robust boundaries and represents a rounding off of the Chester Settlement and the ability to provide a defensible boundary to the north.
- As the Main Urban Area of the Borough, Chester should accommodate a proportionate level of growth to reflect its role and make effective use of existing public transport infrastructure and availability of services and facilities.
- The exceptional circumstances exist for altering the Green Belt boundary in CWaC due to the significant increase in housing needs, the inability of CWaC to currently meet its housing needs, and the substantial reduction in available PDL land since the previous Local Plan.
- The Site does not strongly contribute to any purposes of the Green Belt and constitutes 'Grey Belt' land where its development would not be considered "inappropriate" in accordance with Paragraph 155 of the NPPF.
- The development of the Site will contribute to enhancing the sustainability of Chester by providing much-needed market and affordable homes, as well as community infrastructure for new and existing residents, which will support local services, facilities and schools, in line with CWaC's spatial strategy.
- The Site is available, achievable and suitable, and therefore, wholly deliverable in the context of the NPPF.

- Therefore, the Site should be considered as a crucial element of the emerging Local Plan's deliverable supply under any growth option that is pursued (either A, B or C).

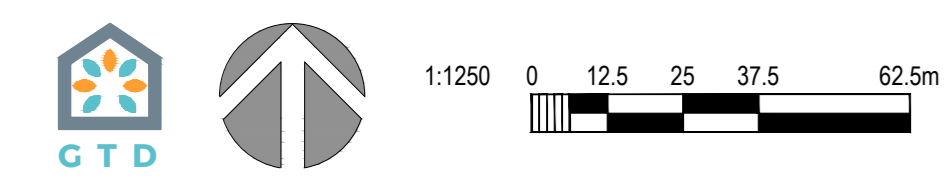
4.3 Taylor Wimpey would welcome further engagement with the Council on the Site, and are committed to robustly demonstrating the merits of the Site as the Local Plan is progressed. We would be happy to provide further information or a meeting on the Site, which can be facilitated via Asteer.

**APPENDIX 1 – Site Location Plan**

LEGEND  
SITE BOUNDARY



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RED EDGE PLAN

PRELIMINARY

1:1250 @ A0, 1:2500 @ A2 AUG 25 2023

DRAWING NUMBER

1501 RE 01

**APPENDIX 2 – Taylor Wimpey Overarching Representations to the Regulation 18 Issues and Options Consultation (prepared by Lichfields)**

# **Cheshire West and Chester Local Plan**

## **Overarching Representations to the Regulation 18 Issues and Options Consultation**

Taylor Wimpey UK Limited

29 August 2025

**LICHFIELDS**

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## 1.0 Introduction

1.1 These representations have been prepared by Lichfields on behalf of Taylor Wimpey UK Ltd [Taylor Wimpey], in relation to the Cheshire West and Chester [CWaC] Local Plan Regulation 18 Issues and Options Consultation [Issues and Options Plan].

1.2 Taylor Wimpey has an active interest in delivering high quality homes in the Borough and supports the intentions of CWaC Council [the Council] to commence preparation of a new Local Plan. Taylor Wimpey considers that adoption of a new Local Plan is vital to enable the Council to address the requirement for much needed new homes across the Borough and ensure that this process is plan-led.

1.3 These representations have been prepared alongside a number of site-specific representations which have also been submitted by Taylor Wimpey. The details of these sites are listed below:

- 1 **Land at Chester Road, Tattenhall:** the site extends to 6.92ha and has the capacity to deliver 110 new homes including affordable housing. A planning application (LPA ref. 25/02070/FUL) for the delivery of 110 homes on the Site was submitted on 27<sup>th</sup> June 2025 and is currently pending determination.
- 2 **Land at Robin Hood Lane, Helsby:** the site comprises 5.11 hectares and has a potential capacity to deliver 100 dwellings. Taylor Wimpey has recently submitted a pre-application advice request to the Council in July 2025, to discuss development proposals for an immediate planning application for c. 100 homes on this grey belt site.
- 3 **Land at Parkgate Road, Chester:** the site comprises approximately 24 hectares and forms a natural and logical extension to the north of Blacon, Chester. The site does not strongly contribute to any purposes of the Green Belt and constitutes grey belt land. The site also has the opportunity to deliver 400-500 homes.
- 4 **Land at Warrington Road, Cuddington:** the site is located adjacent to the north of the urban edge of Cuddington, to the east of Warrington Road. The site comprises 14.65 ha and is currently in agricultural use. The site has the capacity to deliver around 300 dwellings.

1.4 These representations should be read alongside the site-specific representations submitted by Taylor Wimpey. These representations focus on strategic matters such as the Council's proposed approach to meeting its housing requirement and spatial strategy considerations, as well as the proposed development management policies relating to residential development.

1.5 Taylor Wimpey is keen to ensure that the new Local Plan is positively prepared which provides appropriate strategic and development management policies to guide new residential development over the plan period. Taylor Wimpey would welcome ongoing engagement with the Council as the consultation responses are considered, and the preparation of the new Local Plan is progressed. Taylor Wimpey would be happy to discuss any feedback in relation to these representations, or the separate site-specific representations listed above.

## **Taylor Wimpey**

- 1.6 Taylor Wimpey was founded in 2007 and are one of the UK's largest housebuilders, delivering a wide range of sustainable new homes and communities across the country.
- 1.7 Taylor Wimpey has a proven and respected track record of delivering high-quality, sustainable developments across Cheshire West and Chester, with Kings Moat Garden Village standing as a flagship example of our commitment to placemaking, community integration, and long-term stewardship.
- 1.8 Kings Moat Garden Village exemplifies Taylor Wimpey's ability to deliver large-scale, complex developments in close collaboration with local authorities, stakeholders, and residents. The scheme has been praised for its design-led approach, incorporating generous green infrastructure, accessible public open spaces, and a diverse mix of housing that meets local needs. Taylor Wimpey's delivery at Kings Moat has demonstrated:
- 1 Strong engagement with CWaC officers and consultees, ensuring alignment with local planning policy and strategic objectives;
  - 2 Timely and efficient build-out, with infrastructure and housing delivered to programme and to a high standard;
  - 3 Commitment to biodiversity and sustainability, including the integration of nature-friendly landscaping.
  - 4 Positive community impact, with feedback from residents and stakeholders highlighting the quality of homes, layout and amenities.
- 1.9 Taylor Wimpey is fully committed to supporting the Local Plan process and demonstrating the suitability of its land interests for residential development during the next Plan Period, to meet the growth requirements of the Borough.

## 2.0 National Policy Context

### National Planning Policy Framework

- 2.1 The most recent iteration of the National Planning Policy Framework [NPPF] was published in December 2024. The overarching aim of the Framework is to proactively deliver sustainable development to support the Government’s economic growth objectives. The most recent revisions to the Framework seek to boost the delivery of homes to meet the Government’s 1.5 million home target within their 5-year term, and the preparation of up to date local plans is seen as a vital way of ensuring this can be achieved.
- 2.2 The NPPF (Chapter 3 – Plan Making) sets the context for the preparation of individual local plans. NPPF para. 15 sets out that the planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings.
- 2.3 Plans should<sup>1</sup>:
- a be prepared with the objective of contributing to the achievement of sustainable development;
  - b be prepared positively, in a way that is aspirational but deliverable;
  - c be shaped by early, proportionate and effective engagement between plan- makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
  - d contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
  - e be accessible through the use of digital tools to assist public involvement and policy presentation; and
  - f serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

### Housing Requirement

- 2.4 Alongside the revised NPPF (December 2024) a new standard methodology [SM3] for calculating local housing need [LHN] was published. The introduction of SM3 has significantly increased the housing requirement in CWaC which is now 1,928 dpa (based on affordability ratios published in March 2025 and 2024 dwelling stock). CWaC will therefore be required to identify land to accommodate at least 28,710 dwellings over a 15-year plan period in an emerging Local Plan.
- 2.5 This is significantly higher than the current Local Plan housing requirement of 1,100 dwellings and is also considerably higher than the previous LHN of 532 dpa. The new Local LHN is applied with immediate effect to both CWaC’s five year housing land supply (5YHLS) (as the adopted Local Plan is more than 5 years old) and as a minimum requirement for plan-making purposes.

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<sup>1</sup> NPPF para. 16

- 2.6 This significant increase in CWaC's housing requirement requires a pragmatic and proactive approach to growth, which will require the delivery of new sites for housing across the Borough, focused on the most sustainable settlements.

## **Housing Land Supply**

- 2.7 As required by the NPPF (para. 72) there will be a requirement on CWaC to demonstrate a five-year supply of deliverable housing sites upon adoption of the new Local Plan, which includes for an appropriate buffer. Based on the current LHN for CWaC (1,928 dpa plus a 5% buffer), CWaC will be required to identify enough land to demonstrate a deliverable housing land supply of 10,122 dwellings in the first five years of the plan period.
- 2.8 The CWaC Housing Land Monitor Summary Report 2025 provides detailed information on the supply of housing land in the Borough. This sets out that the Council has a 5YHLS position of 1.89-years.
- 2.9 Lichfields notes that following the publication of updated affordability ratios in March 2025 and updated 2024 dwelling stock figures released in May 2025, the LHN is now 1,928 dpa. Based on the calculation set out in the Housing Land Monitor Summary Report and a deliverable housing land supply of 3,788 dwellings, the Council's 5YHLS position has deteriorated further and is now 1.87-years. This represents a significant and immediate shortfall of 6,334 dwellings. The Council must therefore identify a significant quantum of deliverable housing land supply through new housing allocations as part of the preparation of the new Local Plan.
- 2.10 As set out in the introduction to these representations, and the accompanying site-specific representations, Taylor Wimpey has a number of deliverable sites in CWaC which can help to deliver dwellings quickly and assist the Council in demonstrating a sufficient supply for the first five years of the plan period.

## 3.0 **Issues and Options Consultation – Response to Key Topic Questions**

### **Proposed Approach VI 1 - Vision**

- 3.1 VI 1 sets out the proposed vision for CWaC, aspiring to be a desirable and attractive place to live, work, learn and visit. VI 1 also provides four overarching principles, namely tackling climate change, promoting wellbeing, providing infrastructure and protecting character.
- 3.2 Taylor Wimpey supports the Council’s overarching vision and the four principles by which this will be achieved. However, there is a lack of focus on new homes within this framework. Given that the Council is seeking to establish the Borough as an attractive place to live, the delivery of new homes is fundamental to ensuring that housing provision is not only planned but also realised. As such, Taylor Wimpey suggests that the overarching principles be amended to provide a more explicit focus on new homes in the Borough.

### **Proposed Approach SS 1 – Housing Needs**

- 3.3 Taylor Wimpey supports the Council’s use of its LHN figure in the emerging Local Plan as a minimum figure, as it enables proactive planning to meet housing needs. The government has recognised that there is a severe housing crisis in England, characterised by a significant shortage of affordable housing to meet the needs of the population. As such, the government has set a clear objective of significantly boosting the supply of homes in order to meet a target of 1.5 million homes within their 5-year term. The housing shortage is also evident within CWaC, which has experienced affordability issues across the Borough. The Issues and Options Plan recognises this, noting awareness of the unaffordability of housing in parts of Cheshire West and how many young people and those on lower incomes struggle to access the housing market (page 23).
- 3.4 Policy SS1 states that the Council plans to deliver a minimum of 1,914 new homes per year over the plan period. For a 15-year plan, this equates to a total of 28,710 new homes. This minimum figure is based on the Council’s Local Housing Need [LHN] as of December 2024, calculated using the revised stock-based methodology introduced alongside the December 2024 iteration of NPPF. Taylor Wimpey considers that the Council should seek to meet its identified need in full, in line with the NPPF (para. 61), to ensure issues of affordability can be adequately addressed and the objectives of the NPPF can be realised.
- 3.5 Furthermore, as set out previously, the 1,914 dwelling requirement is no longer reflective of the current LHN. Following the release of updated housing stock data and March 2025 affordability ratios, the Council’s LHN is now 1,928 dpa. Accordingly, the policy should reflect the most up-to-date LHN when the draft Local Plan is published.
- 3.6 Meeting the full LHN will help to ensure that a wide range of housing needs are met across the full extent of the Borough, including market and affordable housing requirements, and all types and tenures of housing to meet the needs of all aspects of the local population including first time buyers, family homes, and those in specialist need. The Borough has not escaped the symptoms of the housing market crisis with rising house prices and worsening affordability ratios that make it increasingly likely that younger residents have to move out of the Borough to find suitable housing choices. However, housing delivery has

been healthy since the adoption of the current Local Plan in 2015 (averaging 1,686 dpa). This consistent level of recent delivery demonstrates that the market is capable of achieving the housebuilding needs set by Government, and there is evidence that the recent high level of housing delivery is starting to slow down growth in house prices and affordability ratios in this Borough.

3.7

Taylor Wimpey does not consider that there is any justification for the Council to seek a lower housing requirement below the LHN. Conversely, the standard method figure of 1,928 dpa should therefore be treated as a minimum. This has been quantified through work on a Research Paper prepared by a Consortium of housebuilders (comprising Taylor Wimpey, Barratt / David Wilson Homes and Redrow Homes). The Research paper has been submitted as a separate representation to this consultation and is appended to these representations for ease of reference (see Appendix 1). The Research Paper concludes that the standard method figure of 1,928 dpa should therefore be treated as a minimum because:

- 1 The NPPF clearly states that local plans should meet the development needs of their area and as a minimum provide for the objectively assessed needs for housing. Numerous Inspectors at local plan examinations have supported this position.
- 2 Housing needs can now expressly justify exceptional circumstances for Green Belt release, and it is mandatory for LPAs, if necessary, to alter Green Belt boundaries when they cannot fully meet housing requirements (unless there is evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan).
- 3 Housing need modelling scenarios which maintain current demographic trends, including an aging population, suggest a housing requirement of at least 1,763 dpa, whilst a scenario which aligns economic growth and housing needs in line with LEP growth aspirations suggests a requirement of at least 2,169 dpa. These two scenarios straddle the SM3 figure of 1,928 dpa.
- 4 There are potentially significant economic benefits of pursuing at least the 1,928 dpa figure which will not be realised if a lower requirement is set, including:
  - 5 Over £340m in capital investment p.a.;
  - 6 Over 10,000 FTE direct and indirect construction jobs p.a.;
  - 7 Almost £950 million in economic output p.a.;
  - 8 £22m in resident expenditure p.a.; and
  - 9 Council Tax revenue of £4.3m p.a.
- 10 The benefits associated with pursuing a more positive economic growth-led housing requirement would be even higher. This needs to be considered against a context of CWaC falling behind its neighbours when it comes to job growth over recent years.
- 11 CWaC's population is projected to grow at a faster rate than any of its neighbouring authorities as well as relative to the wider regional and national projected growth rates. This presents a need to ensure that sufficient housing is provided so that this growth potential is not constrained.

- 12 Despite high levels of housing delivery over recent years, there remains a crisis of supply nationally and regionally, and a very challenging affordability gap, both of which can be addressed, or at least slowed, by delivering more housing.
- 13 Despite high levels of affordable housing delivery, there remains an acute need for new affordable homes to address significant housing waiting list numbers and rising levels of homelessness. The cost of temporary accommodation is having an unsustainable impact on the public purse.
- 14 High levels of homebuilding will create churn in the market, providing opportunities for first time buyers, growing families or downsizers, and new forms of retirement and care for the ageing population.
- 15 High levels of new home provision will help to deliver better health and wellbeing outcomes for residents – for example, by addressing overcrowding and the associated mental health toll this can generate, providing greater choice in housing tenures, type, size and location, delivered to modern high efficiency standards which in turn reduces the burden on NHS resources and addresses other related issues such as fuel poverty and cost of living.

3.8 Question SS2 is requesting comments on a stepped housing requirement that plans for a lower level of housing delivery earlier in the plan period. Taylor Wimpey is fundamentally opposed to the use of a stepped housing requirement to backload housing delivery. In light of the national housing shortage, an issue also affecting CWaC, and a national drive to increase delivery it would not be the correct approach to delay the delivery of housing until later in the plan period.

3.9 Taylor Wimpey considers that this would be a flawed approach to housing delivery in the Borough. The emerging Plan and its evidence base do not provide any robust justification for including a phased housing requirement which significantly reduces delivery in the first years of the Plan. It is also worth noting that the past annual delivery in Cheshire West broadly accords with the proposed housing requirement and it would be counterintuitive to artificially suppress delivery in the early part of the plan period.

3.10 As set out in the CWaC Housing Land Monitor Summary Report 2025 the Council can only demonstrate a 5YHLS position of 1.89-years. Taylor Wimpey considers that this reduces further to 1.87-years when factoring in the updated LHN of 1,928 dpa. This represents a significant shortfall of 6,334 dwellings. The Council must therefore identify a significant quantum of deliverable housing land supply through new housing allocations as part of the preparation of the new Local Plan. The Council's inability to demonstrate a 5YHLS should not be used as justification to backload housing delivery, and new housing sites should be identified instead to ensure it can demonstrate a 5YHLS against its full housing requirement set by LHN.

3.11 The stepped delivery of housing will not enable housing needs to be met in the early years of the plan period, and in turn this will exacerbate affordability issues by ignoring the need to deliver affordable homes which can meet the needs of the population and ensure young people and those on lower incomes can access the housing market.

3.12 As set out in the introduction to these representations, and the accompanying site specific representations, Taylor Wimpey has a number of deliverable sites in CWaC which can help

to deliver dwellings quickly and assist the Council in demonstrating a sufficient supply for the first five years of the plan period. Therefore, Taylor Wimpey recommends that an approach which uses a fixed annual requirement is applied to ensure needs can be met on a consistent basis throughout the plan period.

### **Draft Policy SS 3 – Spatial strategy principles**

- 3.13 Policy SS 3 sets out that the spatial strategy will follow the principle of directing new development and allocating land, towards previously developed sites within settlements first, as they are the most sustainable locations with best access to services and facilities. 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.
- 3.14 Taylor Wimpey supports this general approach to prioritise the development of previously developed land first, in line with a 'brownfield first' approach. This aligns with NPPF para. 147a, which sets out that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development, making as much use as possible of suitable brownfield sites and underutilised land.
- 3.15 However, it is clear that there is a significant shortage of deliverable and developable housing land across the Borough and land within the urban area will not suffice. This is acknowledged in the Plan itself at Para 5.3 which states that *'The Land Availability Assessment (Stage One) report suggests that there are sites on previously developed land without planning permission, including undeveloped Local Plan allocations, within the main urban areas and Key Service Centres, with a potential capacity of just over 5,000 homes. However, this figure is likely to reduce once a detailed assessment of the constraints, development potential and availability and achievability is carried out in stage two of the process'*. Policy SS 3 must therefore include an acknowledgement that Green Belt release is likely to be required across the Borough in order to meet identified housing needs within the plan period.
- 3.16 Given the scale of the housing shortfall across the Borough, it is clear that there is a need for greenfield development on the edge of sustainable settlements and Green Belt release where required. It is vital that the Council does not adopt an overreliance on urban and brownfield sites, given the potential viability challenges and the limited range of development types that such sites can accommodate. Brownfield or previously developed land can be subject to significant deliverability and viability issues, due to factors such as land contamination and remediation costs, fragmented landownership and other physical and environmental constraints. Reliance on brownfield land is likely to result in deliverability issues and restrict the Council's ability to address its deficient housing land supply.
- 3.17 Furthermore, the scale of the shortfall is well evidenced by the Council's current housing land supply position. Although this focuses on the deliverable land supply (first five years of the plan period) it provides a useful indication of the evident lack of supply within the

Borough, and highlights an urgent need for new housing sites to come forward for development. The Council can only demonstrate a 5YHLS of 1.87-years, and an overreliance on brownfield land as part of its spatial strategy will only exacerbate this supply position in the short term and also prevent the Council from meeting longer term needs.

- 3.18 As such, the Council must ensure that Policy SS 3 facilitates a balanced and realistic spatial approach which fully addresses the need to deliver substantial levels of housing on the edge of sustainable settlements to ensure housing needs are met in full.

## **Draft Policy SS 4 – Settlement Hierarchy**

- 3.19 Taylor Wimpey agrees with the suggested approach towards the settlement hierarchy in Cheshire West and Chester.

- 3.20 Draft Policy SS 4 designates Chester at the top of the settlement hierarchy as the only ‘City’ within the Borough (Tier 1). Taylor Wimpey fully supports the designation of Chester as a City at Tier 1 of the settlement hierarchy, as well as the inclusion of an individual policy for Chester to enable a strategy for sustainable growth in the settlement to be considered. As the only City in the Borough, it is considered that Chester should accommodate a level of development and growth that reflects its scale, location and sustainability, which should be reflected in the spatial strategy and land allocations in the emerging Local Plan. Taylor Wimpey also supports these settlements having individual place based policies in order to set out the vision, core features, key issues and clear strategy for what development will take place.

- 3.21 Draft Policy SS 4 also sets out that the following settlements have a level of facilities and services that mean they can meet the day-to-day needs of their residents and those living in surrounding areas:

- Cuddington and Sandiway
- Farndon
- Helsby
- Kelsall
- Malpas
- Tarporley
- Tarvin
- Tattenhall

- 3.22 It is evident from this version of the Plan that these settlements are defined as ‘Tier 2’ settlements. Whilst not defined within Draft Policy SS 4, all of these settlements are currently designated as Key Service Centres in the adopted Local Plan. For the avoidance of doubt, it is considered that future versions of the Local Plan should clarify that these settlements will be retained and defined as Key Service Centres given their established status as main settlements in CWaC.

- 3.23 Aside from the larger settlements of Chester and Ellesmere Port, CWaC is a borough characterised by a number of smaller but very sustainable settlements. The most

sustainable rural settlements act as Key Service Centres to the local population. Locating most new development within and on the edge of the Borough's main urban areas and key service centres enables the maximum use of existing infrastructure and resources and allows homes, jobs and other facilities to be located close to each other. Key Service Centres will therefore play a significant role in ensuring that the Council can meet its housing needs over the next plan period, and directing development to these locations will ensure that new residential development is appropriately apportioned across the Borough in a sustainable manner.

- 3.24 In particular, Taylor Wimpey supports the continued identification of Helsby, Cuddington and Sandiway, and Tattenhall as Key Service Centres, retaining their status as Key Service Centres in the new Local Plan. These settlements are highly sustainable and suitable locations to accommodate additional levels of growth in the emerging Local Plan, providing a substantial contribution to meeting the housing requirement over the next plan period.
- 3.25 Policy SS 4 is currently worded to suggest that only the larger settlements of Chester, Ellesmere Port, Northwich, Winsford, Neston and Parkgate and Frodsham will have an individual place-based policy for each settlement will set out the vision, core features, key issues and clear strategy for what development will take place. It is not clear from the evidence presented why Frodsham and Neston and Parkgate (both Key Service Centres in the previous plan) have been elevated in importance within this version of the Plan.
- 3.26 It is also not clear if the Council will be adopting the approach of having individual policies for the other settlements listed in the policy, though Taylor Wimpey would support these settlements having their own specific place-based policies in order to set out the vision, core features, key issues and clear strategy for what development will take place. This should be justified within the spatial strategy and included within the next iteration of the emerging Local Plan.

## **Draft Policy SS 5 - Spatial strategy options**

- 3.27 Taylor Wimpey does not consider that any of Options A, B and C set out in Policy SS 5 represent appropriate spatial strategies in their own right, and an alternative approach should be considered. In particular, Option A which seeks to retain the Green Belt is not considered an appropriate strategy. It would be illogical to avoid locations in sustainable settlements solely to protect the Green Belt, particularly when national policy provides a clear framework for its release.
- 3.28 Additionally, much of the northern part of the Borough is constrained by Green Belt. This includes the land around Chester, the Borough's most sustainable settlement. Allowing Green Belt release in these sustainable locations ensures that new homes are positioned close to essential services and amenities. Avoiding Green Belt release would lead to an over-reliance on smaller settlements in the south of the Borough, which often lack the same level of infrastructure and sustainability credentials. While these settlements should accommodate a proportionate level of growth, directing the majority of development to them would not represent a sustainable spatial strategy.
- 3.29 An alternative approach, which ensures the Council's full identified need for housing can be met, and apportioned growth to the most sustainable locations across the Borough, should be pursued.

- 3.30 As set out previously in these representations, there are significant recent changes in circumstance that would now justify the release of Green Belt within CWaC. Alongside the revised NPPF (December 2024) a new standard methodology [SM3] for calculating LHN was published. The introduction of SM3 has significantly increased the housing requirement in CWaC which is now 1,928 dpa. CWaC will therefore be required to identify land to accommodate at least 28,710 dwellings over a 15-year plan period in an emerging Local Plan. This is significantly higher than the current Local Plan housing requirement of 1,100 dwellings and is also considerably higher than the previous LHN of 532 dpa.
- 3.31 The new LHN is applied as a minimum requirement for plan-making purposes. It is expected that this increase will lead to a significant shortfall in developable housing land in the Borough. Given the scale of the housing shortfall across the Borough, it is clear that there will be insufficient brownfield land within urban areas to meet housing needs over the plan period. The Council must also adopt a sustainable approach to apportioning growth across the Borough to ensure it is not concentrated on only the largest few settlements. Therefore, there is a need for greenfield development on the edge of sustainable settlements and Green Belt release where required, to ensure economic, social and environmental objectives can be achieved across the whole Borough and housing needs can be met in full.
- 3.32 As set out in the NPPF (para. 145), Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes, and authorities should review Green Belt boundaries in accordance with the policies in the NPPF (para. 146). The Council will need to adopt a proactive approach to growth and must undertake a full Green Belt review in order to support this process.
- 3.33 Policy SS 5 also cites the Examiner's Report into the Local Plan (Part One) as potential justification for the retention of the Green Belt around Chester. Given the significant increase in housing need for the Borough and the wider aspirations of the Issues and Options proposals (achieving economic and social growth, with the City of Chester acting as the catalyst), the context against which the Examiner made their conclusions in 2014 has significantly and materially changed to the extent that these comments should not be considered in the formulation of Policy SS 5.
- 3.34 The Inspector's report was published in 2014 and considered the adopted Local Plan in a vastly different policy context, and against an objectively assessed need for housing well below the current LHN. The Inspector's Report was prepared in the context of a previous iteration of the NPPF which has now been superseded, and the content and policies in the 2024 NPPF and updated PPG are materially different in relation to elements of Green Belt policies and the introduction of grey belt. It would therefore be inappropriate to draw out the conclusions from this report and apply this to the emerging Local Plan given the currently incomparable context.
- 3.35 The Inspector's Report (para. 95) states that *"a key purpose of the Green Belt around Chester is to preserve the setting and special character of the historic city. Decisions will clearly need to be made regarding the longer term strategy for the scale of growth in the Borough and the role of Chester in meeting development needs beyond 2030 within this context"*. Potential alterations to the Green Belt boundary must therefore be assessed against the current policy context including the revised NPPF and the specific guidance set

out in the PPG in relation to grey belt and the assessment of land parcels against the relevant Green Belt purposes. There is no justification to use comments made in the Inspector's Report on Green Belt release around Chester to guide decisions on an appropriate spatial strategy in a new Local Plan.

### **Draft Policy GB 1 - Green Belt and countryside**

- 3.36 Taylor Wimpey considers that there should be a separate policy for Green Belt and countryside areas, and this should consolidate policy wording set out in CWaC Local Plan Part One and Part Two. Taylor Wimpey also consider that this policy should reflect the current policy approach required in relation to grey belt land, and should also include the approach taken to reflect Green Belt review evidence (to be prepared). The Council must ensure that it is informed by an overall application of the relevant policies in the NPPF, and follows the guidance set out in the PPG when reviewing Green Belt boundaries. The Council must also seek to identify grey belt land to inform this review and the prioritisation detailed in paragraphs 147 and 148 of the NPPF.

### **Draft Policy TA 1 - Transport and accessibility**

- 3.37 Taylor Wimpey supports the general principles set out in Policy TA 1 and agrees that new development should come forward in the most sustainable locations (particularly Tier 1 and 2 settlements) to accommodate a reduced reliance on cars and facilitate travel by sustainable modes of transport. Taylor Wimpey also supports the intention to seek opportunities to extend and improve access to local footpath and cycle networks, and new well designed development can help to achieve this.
- 3.38 In relation to parking standards, Taylor Wimpey supports the flexible approach outlined in TA1 and the consideration of future connectivity needs. However, Taylor Wimpey requests that sufficient flexibility is maintained by avoiding the imposition of restrictive maximum parking standards across the Borough.

### **Draft Policy ID 1 - Infrastructure and developer contributions**

- 3.39 The suggested approach is to amend the Local Plan (Part One) policy STRAT 11 to ensure educational needs, including contributions to school transport provision will be required. The policy approach will clarify that where infrastructure is needed to sustain a new development, that off-site contributions may not be acceptable and that the Council will not be expected to fund any shortfall in provision.
- 3.40 The NPPF (para. 35) is clear that local plans should set out the contributions expected from development and that such policies should not undermine the deliverability of the Plan. The Council will need to be able to demonstrate that the infrastructure needed to support new development in the Plan for is viable, which is essential for deliverability. It will also be important to ensure that any increase in viability pressures do not place too high a burden on developer contributions which may serve to undermine the deliverability of Local Plan policies.
- 3.41 Taylor Wimpey considers that it is important for any potential financial contributions to be fully justified and based on a credible and robust evidence base, reasonable in terms of the

relationship to the development, and not unduly restrictive so as to affect the viability and deliverability of the development. The financial contributions requested should meet the tests as set out in NPPF para. 57:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and,
- Fairly and reasonably related in scale and kind to the development.

3.42 The policy should make direct reference to the above CIL tests and ensure that the policy is clear that any financial contributions required by the Council will be considered in this context. Development should only be required to mitigate its own impact and cannot be required to address existing deficiencies in infrastructure or services. It is therefore essential for an Infrastructure Development Plan (IDP) to clearly highlight existing deficiencies in the current infrastructure.

3.43 It is also unclear whether the Council will be undertaking a review of the adopted CIL Charging Schedule and Regulation 123 list as part of the emerging Local Plan process, and Taylor Wimpey would welcome clarity on this matter.

### **Draft Policy HO 1 - Mix and type of housing in new developments and specialist housing**

3.44 Policy HO1 outlines that the new approach to housing types and mix will be informed by a forthcoming Housing Needs Assessment [HNA]. This assessment will underpin specific policy requirements, including percentage splits for housing mix, provision of plots for self-build and custom homebuilding, and measures to meet the needs of an ageing population and residents with disabilities.

3.45 Taylor Wimpey supports the Council's intention to deliver an appropriate mix of housing to meet the needs of the wider community. However, it is essential that this policy is applied with flexibility to ensure that individual sites can respond to market conditions. Certain locations may be better suited to a housing mix that differs from the recommendations of the HNA particularly in a location such as Chester where the majority of the units coming forward in the urban area are likely to be smaller apartment type developments.

3.46 A rigid application of percentage-based requirements would not reflect the diverse local conditions across the Borough. Taylor Wimpey expects the Council to ensure that the policy is applied flexibly and makes allowances to provide alternative housing mixes as is required by the market. If specific percentage targets are pursued, Taylor Wimpey recommends that these are expressed as ranges, with additional wording included to allow for flexible interpretation where justified.

3.47 Furthermore, viability testing of the proposed housing mix policy will be necessary as part of the emerging Local Plan particularly given the high CIL charge in Cheshire West and Chester. This testing should be completed in advance of the Regulation 19 version of the Plan to ensure that the policy is deliverable and does not undermine the viability of development.

## **Draft Policy HO 2 - Delivering affordable housing**

- 3.48 Policy HO2 proposes to set a percentage requirement for affordable housing across the Borough, with the potential for this to vary by sub-area. It is noted that a minimum of 50% affordable housing will be required on Green Belt sites, and that the policy will specify the types of affordable housing to be delivered. Additionally, Policy HO2 proposes that affordable housing will be required on all sites of 10 or more dwellings, with the threshold reduced to three or more dwellings in designated rural areas.
- 3.49 Taylor Wimpey supports the inclusion of affordable housing in new developments and agrees that a threshold of 10+ dwellings is appropriate for triggering this requirement. Taylor Wimpey also supports the potential for sub-area variation, ensuring that affordable housing provision reflects local market conditions and housing needs across the Borough. The Council must ensure that appropriate flexibility is factored into the policy in this regard to ensure new residential development can respond to the requirements of the market. Viability testing of the proposed affordable housing requirements will be essential and must be undertaken as part of the emerging Local Plan, ahead of the publication of the Regulation 19 version.
- 3.50 The Council must ensure that any affordable housing requirements are clearly set out in the policy, are evidenced as viable through an assessment, and that flexibility is provided within the policy where viability may be an issue.

## **Draft Policy HO 3 - Proposals for residential development**

- 3.51 Policy HO 3 proposes to retain existing Policy DM 19 (Proposals for residential development), which provides the requirements for residential developments within identified settlements, the countryside, and the Green Belt.
- 3.52 Taylor Wimpey supports the proposed retention of Policy DM 19 on the basis that the policy retains the flexibility allowing for development within the Green Belt to align with the provisions in the NPPF. It is important that local policy relating to development in the Green Belt does not become out of date or does not reflect national policy.
- 3.53 However, Taylor Wimpey considers that specific references to the development of grey belt land should be included within the updated policy, ensuring clarity that the development of such land is appropriate for residential development, subject to the requirements of NPPF para. 155 being applied.

## **Draft Policy OS 1 - Open space, sport and recreation**

- 3.54 Policy OS 1 sets out that the policy approach will continue to protect, manage and enhance existing open spaces, sport and recreation facilities to provide a network of diverse, multi-functional open spaces. The policy also notes that all major residential development makes provision for open space in accordance with the current open space quantity and accessibility standards and onsite thresholds as set out in current Local Plan (Part Two) Policy DM 35, and developer contributions will be required for playing pitches based on the additional demand generated by new residential development (having regard to Sport England's planning tools and the latest Playing Pitch Strategy). The policy also notes that

open space provision in new developments should be sought in the following order: on site, off-site, a financial contribution.

- 3.55 Taylor Wimpey supports the general approach to the policy, provided the requirements of the policy do not adversely impact the viability position of new sites for residential development. Viability testing of the proposed open space requirements will be necessary and must be undertaken prior to the publication of a Regulation 19 version of the plan.
- 3.56 The NPPF (para. 59) is clear that all viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in the PPG. The PPG sets out that the role for viability assessment is primarily at the plan making stage, and drafting of plan policies should be iterative and informed by engagement with developers and landowners<sup>2</sup>.
- 3.57 In accordance with national policy and guidance, an updated viability appraisal should include for open space requirements and playing pitch contributions. Taylor Wimpey reserves the opportunity to comment further on this policy at a later stage, once an updated assessment has been undertaken.

### **Draft Policy DS 1 - High quality design**

- 3.58 Policy DS 1 sets out that the new Local Plan will promote sustainable, high-quality design and construction. Taylor Wimpey supports the general approach of Policy DS 1 and considers that the design measures and principles set out in the policy are appropriate, provided an adequate level of flexibility is incorporated into the policy to reflect localised context of different areas within the Borough, and to ensure there are no adverse viability impacts linked to specific design requirements.
- 3.59 Within the key issues on Section 27 of the Plan, it states that the Council is currently preparing a borough wide Design Code, setting out the design requirements for developments in Cheshire West. Taylor Wimpey supports the Cheshire West Design Code in principle, but it is imperative that the viability implications of the Design Code are fully reflected in the viability considerations associated with the Local Plan.

### **Draft Policy DS 2 - Sustainable construction**

- 3.60 Policy DS 2 sets out that the policy approach aims to encourage high sustainability standards in buildings and promote the application of the energy hierarchy with the aim of achieving carbon net zero in new residential and commercial developments. Taylor Wimpey supports the general approach of the policy and recognises the importance of delivering high quality energy efficient homes.
- 3.61 Taylor Wimpey is committed to enhancing the sustainability of its sites to reduce climate impact, and seeks to ensure low water consumption measures, an increasing use of timber frame and integrated energy efficient heat pumps in response to the emerging Future Homes Standards and has a target that all homes will be net zero carbon ready by 2030. However, the Council must ensure that Policy DS 2 is not overly prescriptive, must accord with the government's national policy and building regulations and not exceed these

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<sup>2</sup> Paragraph: 002 Reference ID: 10-002-20190509

requirements, and any requirements are appropriately factored in to further viability testing undertaken to inform the Regulation 19 version of the Plan.

## **Draft Policy GI 1: Green infrastructure, biodiversity and geodiversity**

- 3.62 Draft Policy GI 1 proposes to create a single policy relevant to green infrastructure, biodiversity and nature, with considerations on biodiversity net gain, tree replacement rates, and agricultural land. Taylor Wimpey supports the rationalisation of the numerous existing policies into a single policy to cover these topics.
- 3.63 However, it is not considered appropriate for the Council to require a biodiversity net gain above the necessary 10% as set out under the Environment Act. The PPG notes that plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified (Paragraph: 006 Reference ID: 74-006-20240214).
- 3.64 To justify such policies, evidence will need to be provided as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development, which has not been considered at this time. Without sufficient justification, pursuing an increased requirement would not align with the appropriate guidance, and may render development across the Borough unviable.

## **Draft Policy MISC 4 - Meeting the outstanding housing requirement in Tattenhall**

- 3.65 The consultation document (Question MISC 4) questions whether the new Local Plan should have an individual policy for meeting the outstanding housing requirement in Tattenhall that takes forward the content of current Local Plan (Part Two) policy R 2, or whether Policy R 2 should be deleted. The text supporting this question notes that the Council consider that *“the content of this policy may be superseded by updated site allocations in the new Local Plan, depending on the chosen spatial strategy (see SS 5 ‘Spatial strategy options’) and will be adequately covered by a combination of national policy and other policies in the new Local Plan, and could potentially be deleted.”*
- 3.66 Local Plan (Part Two) Policy R 2 identifies and safeguards land and sets criteria for new housing development in Tattenhall. Taylor Wimpey considers that there is no requirement for Policy R2 to be carried over into a new Local Plan. It is considered that a housing requirement should be included for Tattenhall as part of a new Local Plan, which should be similar in nature to Local Plan (Part One) Policy STRAT 8 which apportioned housing requirements for each Key Service Centre in CWaC, including Tattenhall. Taylor Wimpey considers that this is the approach which should be taken in a new Local Plan, which can then be supplemented by individual site allocations which are identified to meet this housing requirement, including the site at Chester Road, Tattenhall. As such, it would therefore be unnecessary for Policy R 2 to be retained, and this should be deleted as part of a new Local Plan.

## 4.0 Conclusion

- 4.1 These representations to the CWaC Reg. 18 Issues and Options Local Plan have been drafted in the context of Taylor Wimpey's committed land interests in the Borough, notably the following sites:
- Land at Chester Road, Tattenhall;
  - Land at Robin Hood Lane, Helsby;
  - Land at Parkgate Road, Chester;
  - Land at Warrington Road, Cuddington.
- 4.2 As noted at the outset, Taylor Wimpey has an active interest in delivering high quality homes in the Borough and supports the intentions of the Council to commence preparation of a new Local Plan. Taylor Wimpey considers that adoption of a new Local Plan is vital to enable the Council to address the requirement for much needed new homes across the Borough and ensure that this process is plan-led.
- 4.3 Taylor Wimpey is keen to ensure that the new Local Plan is positively prepared which provides appropriate strategic and development management policies to guide new residential development over the plan period.
- 4.4 We trust that these representations will be fully considered in the formulation of the emerging Local Plan and would be grateful if you could keep us informed regarding the details of the next stage of consultation.

**APPENDIX 3 – Research Paper: Cheshire West and Chester’s Objectively Assessed Housing Need (prepared by Lichfields on behalf of Barratt Homes, David Wilson Homes, Redrow Homes and Taylor Wimpey)**

## **Research Paper**

# **Cheshire West and Chester's Objectively Assessed Housing Need**

### **Cheshire West and Chester Regulation 18 Local Plan Consultation**

Barratt Homes, David Wilson Homes, Redrow Homes and Taylor  
Wimpey

29 August 2025

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## 1.0 **Introduction**

- 1.1 Lichfields has been instructed by a Consortium of housebuilders, Barratt Homes / David Wilson Homes, Redrow Homes and Taylor Wimpey [the Consortium], to prepare a Research Paper setting out the economic and social benefits to Cheshire West and Chester [CWaC or the Council] Borough of maintaining high levels of housing growth as the Council moves forward with the CWaC Local Plan [LP].
- 1.2 Lichfields has extensive experience and knowledge of CWaC, having helped to bring forward numerous housing developments in the Borough over recent years. As such, we are well placed, having the technical expertise and local experience, to prepare this Research Paper.
- 1.3 The CWaC LP is currently in the early stages of its preparation, with the Issues and Options (Regulation 18) Consultation open until the end of August 2025. The intention of this Research Paper is to help inform the Council's early decision making on its overall spatial strategy, particularly with regards to the scale of housing required in the Borough to meet its overarching economic and social objectives.

## **The Consortium**

- 1.4 We would like to state at the outset the Consortium welcomes the Council's intention to commence preparation of a new LP. The Consortium has a clear and specific interest in the preparation of the LP in the context of continued growth and housing delivery in CWaC, and the multifaceted benefits this can bring to its local residents.
- 1.5 The Consortium includes a range of housebuilders operating in the North West housing market, namely Barratt / David Wilson Homes, Redrow Homes and Taylor Wimpey. Collectively, the Consortium has delivered a significant proportion of the homes delivered in CWaC since the adoption of the Local Plan in 2015.
- 1.6 Together, they have extensive experience in delivering homes in CWaC and have worked positively with the Council over recent years to achieve these mutual goals. They are keen to continue delivering high quality housing in sustainable locations over the coming years. The Consortium is therefore eager to see a LP which is positively prepared and aspirational.

## **Purpose of the Research**

- 1.7 The Consortium welcomes the Council's intention to produce a new Local Plan in line with the requirements of the Local Plan Regulations (The Town and Country Planning (Local Planning) (England) Regulations 2012). It is vital that CWaC Borough Council seizes the opportunity to prepare a new Local Plan at this time to ensure it can respond positively to the housing and affordability crisis, plan for a higher housing requirement generated by the new standard method and respond to recent and future projected changes in the economy. It will provide an opportunity to ensure the Council continues to plan for and deliver the minimum levels of housing growth across the Borough expected by Government, and if justified, going beyond that to further the economic prospects of the Borough and life chances of its residents.

## **Structure of the Research Paper**

1.8

The Research Paper is structured as follows:

- Chapter 2: Provides a review of relevant planning policy, strategic drivers and the macroeconomic context.
- Chapter 3: Undertakes a local contextual review and an objective assessment of the Council's housing requirement to understand the implications of the new standard method figure and why it should represent a minimum housing target;
- Chapter 4: Provides an assessment of the wider economic, health and societal benefits of new housing to understand the implications of pursuing a reduced housing target;
- Chapter 4: Summarises our key conclusions to the Research Paper.

## 2.0 **Setting the Context**

- 2.1 Significant changes have occurred politically and economically over the past 12 months. This has led to knock-on effects for national planning policy and guidance, including mandated housing need requirements for each local authority area, plans for a programme of new towns, as well as an intention to implement a new style of local plan making, national development management policies, the reintroduction of regional planning through spatial development strategies and devolved decision making for elected Mayors.
- 2.2 Given the intertwined nature of local plan making and national policy, and the ongoing changes to the planning system and challenges facing the Borough from a demographic and economic perspective, the Council needs to carefully consider the preparation of their new local plan, and in particular the role that housebuilding plays.

### **Standard Method 3**

- 2.3 The new standard method for calculating local housing need is one of the central tenets of achieving the Government's objective to deliver 1.5 million homes in the current Parliament. The new method is much more ambitious than its predecessor (targeting 372,000 homes per year, up 21% from the previous target of 305,000). The new method aims to boost housing numbers by pinning targets to existing housing stock (rather than household projections, as per the former method) and then uplifting needs, and the target, based on affordability using a 5-year average.
- 2.4 At present, the SM3 results in a local housing need figure of 1,928 dpa for Cheshire West and Chester (considerably higher than the previous SM2 demographic-based figure of 489 dpa, and also much higher than the 2015 Local Plan figure of 1,100 dpa). The starting point for assessing local housing need in Cheshire West and Chester is therefore 1,928 dpa.

### **The National Planning Policy Framework**

- 2.5 The National Planning Policy Framework [NPPF] places a particular emphasis on sustainable development, including the provision of homes and employment land, through a process of:
- 1 Supporting strong, vibrant and healthy communities by ensuring that there is a sufficient number and range of homes to meet the needs of present and future generations;
  - 2 Fostering well-designed, beautiful and safe places that reflect current and future needs.
  - 3 Reviewing employment land allocations to ensure the supply meets identified needs;
  - 4 Proactively supporting sustainable economic development to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure; and,
  - 5 Encouraging the effective use of land by re-using land that has been previously developed (brownfield land), with a view to promoting regeneration.

- 2.6 It states that the purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner [§7].
- 2.7 Paragraph 11 of the NPPF retains the presumption in favour of sustainable development and refers to the expectation that plans should “*meet the development needs of their area*” and “*as a minimum provide for the objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*
- i *the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area<sup>7</sup>; or*
  - ii *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*
- 2.8 Ultimately, the Council’s Local Plan will need up-to-date and comprehensive evidence to inform its judgements about the need for land in its area, particularly in respect of housing needs and a review of Green Belt boundaries.
- 2.9 NPPF now states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or ‘brownfield’ land [paragraph 124].
- 2.10 The NPPF also reforms longstanding Green Belt Policy. Paragraph 146 sets out that housing, commercial and other development needs can expressly justify exceptional circumstances for Green Belt release, mandating that LPAs review and, if necessary, alter Green Belt boundaries when they cannot fully meet housing or commercial requirements unless there is evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.

## **Housing Need**

- 2.11 Regarding housing need, the NPPF has reinforced the Government’s objective of significantly boosting the supply of homes, making explicit reference to the overall aim of meeting an area’s identified housing need, including with an appropriate mix of housing types for the local community [§61]. It states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need [LHN] assessment, conducted using the standard method [SM3] [§62]:
- “To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”*
- 2.12 Local Housing Need LHN is defined in Annex 2 of the NPPF as:
- “The number of homes identified as being needed through the application of the standard method set out in national planning practice guidance.”*

- 2.13 Within this context of establishing need, the size, type and tenure of housing for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing (including Social Rent); families with children; looked after children; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes [§63].
- 2.14 There is an increasing emphasis on the need to plan specifically for social rented properties in the latest iteration of the NPPF Paragraph 64 states that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, including the minimum proportion of Social Rent homes. In the Annex 2 glossary, Social Rent is now given increased prominence and is defined separately from 'other affordable housing for rent' when discussing affordable housing.
- 2.15 The NPPF reconfirms that strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. It goes on to state that the housing requirement may be higher than the identified housing need if it reflects growth ambitions linked to economic development or infrastructure investment:
- “The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.”* [§69]
- 2.16 This makes it increasingly important that assessments of housing needs include robust labour supply scenarios to ensure that future housing targets and employment land needs are in alignment.
- 2.17 The NPPF also includes a new paragraph extolling the virtues of mixed tenure sites:
- “Mixed tenure sites can provide a range of benefits, including creating diverse communities and supporting timely build out rates, and local planning authorities should support their development through their policies and decisions (although this should not preclude schemes that are mainly, or entirely, for Social Rent or other affordable housing tenures from being supported). Mixed tenure sites can include a mixture of ownership and rental tenures”* [§71].
- 2.18 The NPPF goes on to say that authorities should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability [§72].

## **Planning Practice Guidance**

- 2.19 The PPG states that the NPPF expects strategic policy-making authorities to follow the standard method in assessing local housing need. This uses a formula that incorporates a

baseline of local housing stock which is then adjusted upwards to reflect local affordability pressures to identify the minimum number of homes expected to be planned for<sup>1</sup>.

- 2.20 The new standard method [SM3] identifies a minimum annual housing need figure and ensures that plan-making is informed by an unconstrained assessment of the number of homes needed in an area. It does not produce a housing requirement figure. It is important to note that the housing requirement may be higher than the identified housing need, and authorities should consider the merits of planning for higher growth if, for example, this would seek to reflect economic growth aspirations<sup>2</sup>.
- 2.21 The minimum annual local housing need [LHN] figure calculated using SM3<sup>3</sup> firstly sets a baseline using 0.8% of the existing housing stock (including vacant units) for the local authority area (using the most recent data). Housing stock is used because it provides a stable and predictable baseline that ensures all areas, as a minimum, are contributing a share of the national total that is proportionate to the size of their current housing market.
- 2.22 The housing stock baseline figure is then adjusted based on the affordability of the area. The affordability data used is the ratio of house price to workplace-based earnings lower quartile median, published by ONS at a local authority level. The mean average affordability over the five most recent years, for which data is available, should be used.
- 2.23 The affordability adjustment is applied to ensure that SM3 responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes and set at a level to ensure that minimum annual housing need starts to address the affordability of homes<sup>4</sup>.
- 2.24 The calculation is as follows:
- $$\text{Adjustment Factor} = ((\text{five year average affordability ratio} - 5) / 5) \times 0.95 + 1$$
- 2.25 No adjustment is applied where the ratio is 5 or below. For each 1% the ratio is above 5, the housing stock baseline should be increased by 0.95%. An authority with a ratio of 10 will have a 95% increase on its annual housing stock baseline.
- 2.26 The PPG explains that the affordability adjustment is applied to take account of past under-delivery. As SM3 identifies the minimum uplift that will be required, it is not a requirement to specifically address under-delivery separately<sup>5</sup>.
- 2.27 Whilst the resultant LHN figure (which can be applied to the whole plan period) should be kept under review and revised where appropriate, it may be relied upon for plan making for a period of 2 years from the time that the plan is submitted to the Planning Inspectorate for examination.
- 2.28 Whilst stressing that the standard method should be used to assess housing needs, the PPG notes that there are some specific circumstances in which an alternative approach could be justified. This is particularly relevant when considering economic aspirations of individual local authority areas or indeed sub-regions such as Cheshire and Warrington which take a

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<sup>1</sup> 2a-002-20241212

<sup>2</sup> 2a-040-20241212

<sup>3</sup> 2a-004-20241212

<sup>4</sup> 2a-006-20241212

<sup>5</sup> 2a-011-20241212

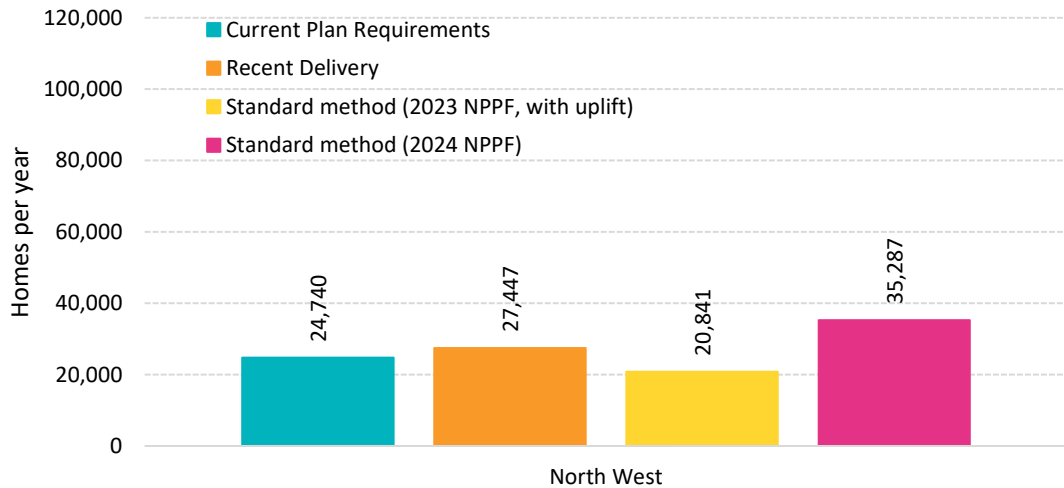
strategic approach to economic development via The Cheshire and Warrington Local Enterprise Partnership [LEP].

## **Current Approach to Determining Housing Needs**

- 2.29 For many years, UK governments have stressed the need to increase housing delivery to address the housing and affordability crisis, which is characterised by a shortage in new housing leading to ever-increasing housing costs. This imbalance between housing supply and demand has resulted in average house prices in England rising from £156,496 in July 2005 to £290,956 in July 2025 – a c.86% increase in 20 years which now represents around 8 times the average workplace-based salary. As a consequence, many homes are unaffordable for first time buyers and housing costs now consume a disproportionately large amount of a family's income, which in turn impacts on quality of life for many.
- 2.30 As a result of this crisis many people are living in overcrowded homes or homes unsuited to their specific needs, and younger people have little option but to live with their parents/guardians or extended family until they are much older as they are unable to save for a deposit to buy their own home whilst paying high rental costs. The average age of first time buyers has grown to approximately 33 years. A large number of people that are unable to meet their housing aspirations look to move out of particular market areas to where housing is more affordable which has many knock-on effects for local economic conditions and availability of community infrastructure.
- 2.31 The ability to meet housing aspirations is often out of reach of young people where owning a home is unachievable and renting is often insecure and expensive, particularly in places where the good jobs are most plentiful. This results in difficulties within the labour market where businesses find it more difficult to recruit and retain staff.
- 2.32 This results in unsustainable commuting patterns, with commuting distances increasing and challenges for some areas seeking economic growth but facing challenges accessing a labour force which can help realise these economic aspirations.
- 2.33 The Labour Government has ambitions to deliver 300,000 new homes a year in England, equating to 1.5 million homes in five years. These manifesto ambitions have led to changes in national planning and housing policy, as well as changes to the Standard Method for calculating housing needs.
- 2.34 The introduction of a standard method for assessing housing needs for planning purposes in 2018 was intended to shift time, resources and debate at local plan examination away from the 'numbers' question and towards the 'how' and 'where' of building new homes. This method - which equated to a figure of around 266,000 per annum when launched - was based on the 2014-based Household Projections plus an uplift for affordability, subject to a 'cap'.
- 2.35 In August 2020, the Government consulted on a proposed new Standard Method, which had a greater focus on affordability, the results of which were to boost the national figure to 337,000, with most of the increases in the areas where the gap between house prices and incomes was greatest. This unleashed a political and media storm that led to the proposal being dubbed 'the mutant algorithm', and the Government indicated that it would be reviewing its draft proposals. On 16th December 2020, the Government launched its solution: revert back to the method it introduced in 2018, but with a modification to top up the number in the 20 largest cities and urban areas by 35%, reflecting Government objectives to drive housing into existing urban areas and encourage brownfield development.

2.36 Fast forward to December 2024 and a new Labour Government, the scale of housing need has increased again via SM3 which now calculates a need for over 370,000 new homes per year. The national completion data for England shows just 153,900 homes were delivered in 2024, whilst starts had fallen to 77,780 – the lowest figure since 2009 in the aftermath of the financial crash. The scale of the challenge is clear to see nationally, and indeed in the North West where annual housing need is now in excess of 35,000 per annum, well in excess of the adopted local plan requirements or levels of recent delivery.

Figure 2.1 North West: Local Plan requirements, recent delivery and SM2/SM3 needs

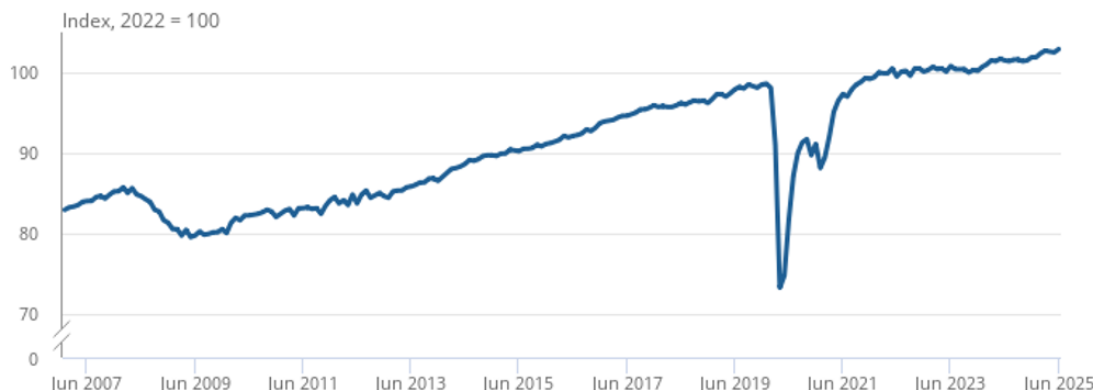


Source: Lichfields analysis

## Current Macro-economic Outlook

- 2.37 Macro-economic trends are a critical influence on the future performance of Cheshire West and Chester’s economy and the resulting need for new housing to support the growth of the labour market.
- 2.38 The outbreak of Covid-19 and resulting pandemic developed rapidly with far reaching impacts on the economy and businesses across the country. The series of lockdown measures led to unprecedented shutdowns of large parts of the economy simultaneously, with effects being transmitted rapidly across all sectors.

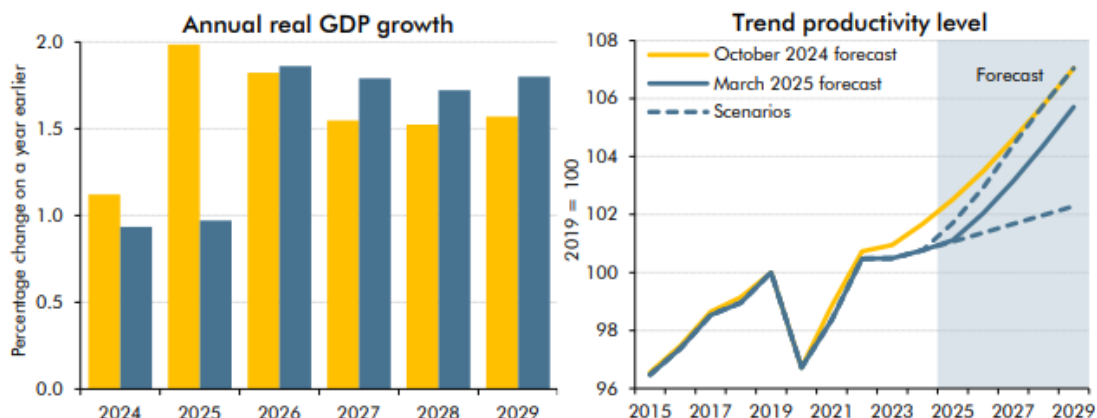
Figure 2.2 GDP Monthly Index, Jan 2007 – June 2025



Source: ONS

- 2.39 The latest official figures from the Office for National Statistics [ONS] show that UK monthly real Gross Domestic Product [GDP] grew by 0.4% in June 2025, following falls of 0.1% in both April and May 2025. Real GDP is estimated to have grown by 0.3% in the three months to June 2025 compared with the three months to March 2025.
- 2.40 All three main sectors grew in June 2025. Services output was the largest contributor to growth in monthly GDP, increasing by 0.3%, whilst production and construction output increased by 0.7% and 0.3% respectively.
- 2.41 This means that GDP is now 4.3% above its pre- Covid-19 peak (January 2020). However, whilst services and construction are 6.3% and 8.2% above their pre-pandemic levels respectively, production is 12.1% below.
- 2.42 The Office for Budget Responsibility’s [OBR’s] latest Economic and Fiscal Outlook [EFO] (March 2025) reports that the economic outlook has recently become more uncertain, with output stagnating in the second half of 2024 and business and consumer confidence trending lower, alongside rising energy prices and greater geopolitical risk. The OBR reports it now expects real GDP growth of 1.0% in 2025 – half the 2.0% growth predicted in its October 2024 forecast, before recovering to around 1.75% per year over the rest of the decade.

Figure 2.3 Real GDP growth and productivity trend level



Source: OBR (2025): Economic and Fiscal Outlook (March 2025) – Chart 1.1

2.43 These forecasts bake-in government policy’s effect on the housing market, with the OBR forecasting net additions to rise from a 12-year low in 2025/26 to reach 305,000 a year by the end of the decade, adding around 0.5% to the housing stock by 2029/30 and adding around 0.2% to economic output.

## Wider Role of Housing in the Economy

2.44 Research has focused on the wider role that new housing can play in supporting economic growth, alongside the need to ensure greater value for money in public expenditure terms. The role of housing in the economy is complex, however; new housing delivery has the potential to generate a range of improved economic outcomes.

2.45 Housebuilding is a relatively labour-intensive activity and generates a high number of jobs per £1 of investment made. This drives up productivity, support existing jobs and make new job creation more likely. Strong local supply chains for materials also mean a far greater share of spending remains in the UK, rather than being channelled into imports as with many other sectors.

2.46 The economic contribution of new housing development has been acknowledged by Government announcements and policy documents, including the Planning White Paper: Planning for the Future<sup>6</sup>, 'Fixing our broken housing market' Housing White Paper<sup>7</sup> and within the updated National Planning Policy Framework<sup>8</sup>. Housebuilding is therefore recognised in national policy as having a major role in stimulating economic growth and ensuring the long-term competitiveness of the UK economy.

2.47 Recent Lichfields research on behalf of the Home Builders Federation [HBF] assessed the economic footprint of the national housebuilding industry and quantified the economic contribution to the national economy<sup>9</sup>. This indicated that in 2023 c.240,000 new homes were built across the UK, generating the following economic impacts:

- £10.5 billion capital investment and expenditure on land and buildings for housing;
- £16.6 billion annual expenditure on supplies, with 90% retained in the UK;

<sup>6</sup> MHCLG (August 2020): *White Paper: Planning for the Future*

<sup>7</sup> MHCLG (2017): *Housing White Paper: 'Fixing our broken housing market'*

<sup>8</sup> UK Government (2024): *National Planning Policy Framework*

<sup>9</sup> HBF (2024): *The Economic Footprint of House Building in England and Wales*

- Supporting nearly 834,000 direct and indirect construction jobs;
- 271,000 people directly employed in the sector – 33% of the construction industry;
- 6,000 apprentices, 900 graduates and 3,300 other trainees supported;
- £6.4bn in tax raised, and £1.5bn of new infrastructure and public facilities funded; and
- Generating £53.3 billion of economic output.

2.48 In its latest Economic Outlook (March 2025)<sup>10</sup> the Office for Budget Responsibility [OBR] estimates that net additions to the housing stock will increase to 305,000 per year by the end of the decade, with around 170,000 additions due to the Government's reforms to the NPPF. The OBR goes on to predict that this will add 0.2% to the level of potential economic output by 2029/30 thanks to a boost in the productivity of residential construction and an increased flow of housing services, rising to 0.5% impact by 2034/35 when factoring in further agglomeration and labour mobility effects.

2.49 This indicates that the house building industry has an important role to play in stimulating economic growth and supporting significant levels of employment. The stark drop off in completions during 2024 will inherently mean greatly reduced economic contributions of the industry during that period.

## Demographic Challenges

2.50 CWaC has the fourth largest resident population in the North West at 371,652 in 2019, having risen by 35,215 or 10.5% in the decade since 2014. In contrast, the populations of the North West and England & Wales have grown by 7.6% and 8.4% respectively over the same period<sup>11</sup>.

2.51 The Borough's working age population (16-64) increased by 18,037 or 8.6% over this period, compared to an increase of 6.3% within the North West and 7.1% across England and Wales. Meanwhile, the number of retirement age residents (aged 65+) in the Borough has risen by 12,800 people or 19.0% since 2014, compared to 15.4% regionally and 13.9% nationally.

2.52 Population change in the past decade has seen the share of retirement-age residents increase from 20.1% in 2014 to 21.6% in 2024, whilst the share of working-age residents has fallen from 62.5% to 61.4%<sup>12</sup>.

2.53 The latest 2022-based Sub-National Population Projections [SNPP] indicate that between 2025 and 2043 (the final year of the forecasts) the population of CWaC is projected to increase by 30,750 people or 8.6%; a level of growth much higher than projected across England at 6.3% and the North West's 5.4%. This is also the highest projected population growth of any of the neighbouring authorities, higher than Cheshire East's 6.4% and significantly above the projected growth in Halton (4.2%), Warrington (2.7%) and Wirral (2.7%) over the same time period, respectively.

2.54 Figure 2.4 shows the extent of overall projected population growth and growth by age cohort. It shows that:

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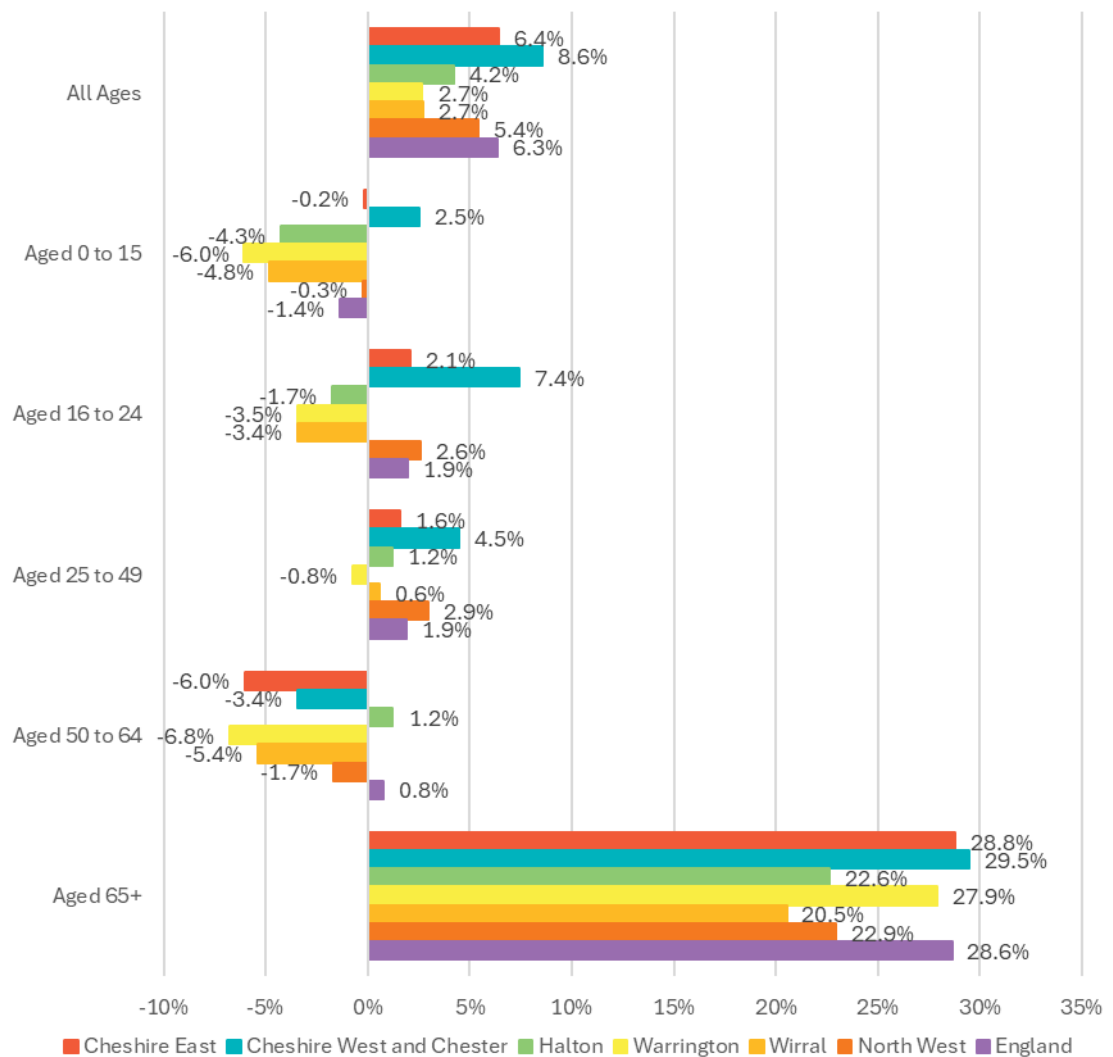
<sup>10</sup> OBR Economic and Fiscal Outlook March 2025

<sup>11</sup> ONS (2025): Mid-Year Population Estimates 2024

<sup>12</sup> Ibid

- 1 CWaC is expected to experience a rise in 0-15 year olds of 2.5%, against an expected decline in this cohort regionally (-0.3%), nationally (-1.4%) and within the neighbouring authorities (-0.2% to -6.0%);
- 2 The Borough is similarly expected to see a greater increase in the population aged 16 to 24 and 25 to 49 than the comparator areas, with anticipated growth in these cohorts of 7.4% and 4.5% respectively;
- 3 The population aged 50 to 64 is expected to decline by 3.4%, with declines also projected in the neighbouring authorities and the North West despite a slight increase of 0.8% projected nationally;
- 4 The population aged 65+ is expected to grow by 29.5% or 24,554 people, the highest level of projected growth across the neighbouring authorities and higher than both the regional and national increases of 22.9% and 28.6% respectively; and
- 5 This increase will see the share of the Borough's residents aged 65 and over increase from 23.2% in 2025 to 27.7% in 2043, whilst the working age population will decrease from 58.9% of the population to 55.5%.

Figure 2.4 Population Projection by Age Band 2025 - 2043

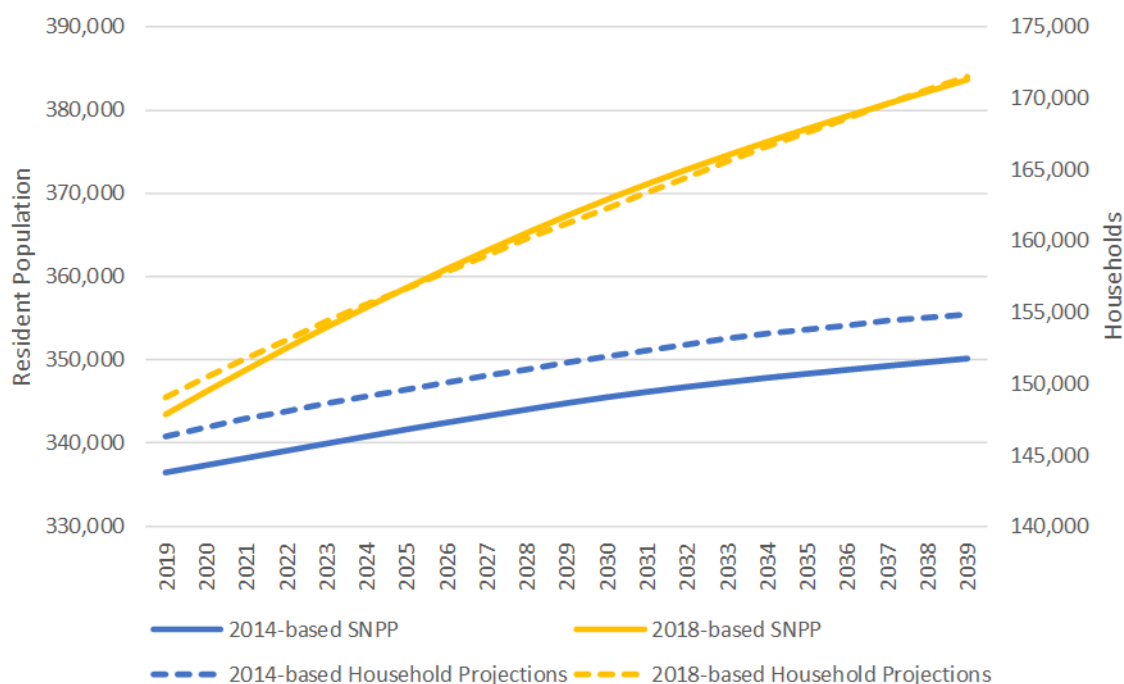


Source: ONS (2024): 2022-Based SNPP

2.55 Figure 2.5 demonstrates the issues faced by CWaC from the latest population projections. The former 2014-based SNPP (and the equivalent SNHP) underpinned the Government's SM2 calculations previous to the introduction of the new stock-based SM3 in December 2024. The Government chose not to revert to the more up to date 2018-based SNPP under the previous Standard Method because this would not be "*consistent with the Government's objective of significantly boosting the supply of homes.*"<sup>13</sup> This may have been the case nationally, where the 2018-based projections are generally significantly lower than the 2014-based SNPP/SNHP, but it is certainly not the case in CWaC.

2.56 The net population growth for CWaC in the 2014-based SNPP is just 13,678 between 2019 and 2039 (the end of the forecasts), with the 2018-based projections almost three times higher with a net growth of 40,198 over the same period. This translates across into the household projections, with the net growth projected in the 2018-based SNHP, of 22,534, significantly higher than the previous 2014-based SNHP (+8,540) over the same time period. This is partly due to the very high levels of housing growth (and associated net in-migration) that have taken place in CWaC since 2014.

Figure 2.5 CWaC's Population Projection 2019 - 2039



Source: ONS (2020): 2018-Based SNPP and SNHP / 2014-based SNPP and SNHP

2.57 The key points to glean from this assessment for CWaC's emerging Local Plan are as follows:

- 1 Firstly, CWaC's population will **grow at a faster rate** than any of its neighbouring authorities as well as relative to the wider regional and national projected growth rates. **This presents a significant economic opportunity** for the Borough and **a need to ensure that sufficient housing is provided** so that this growth potential is not constrained;
- 2 The Borough is likely to see an **increased number of families** with children and will need to plan accordingly for larger housing.

<sup>13</sup> PPG Paragraph: 005 Reference ID: 2a-005-20190220

- 3 Whilst the **ageing population** is an issue to be faced by all areas, **the scale of the issue within CWaC is particularly acute**. This will increase the share of the Borough's population aged 65+ from 23.7% in 2025 to 27.7% by 2043.
- 4 There is set to be **heightened demand for housing across all sizes and tenures**, with the only age groups forecast to decline in overall numbers being 0-9 year olds (albeit only a marginal fall) and 50-64 year olds. This will necessitate the need to provide for a complex and varied housing market for those looking to move but remain within CWaC.

## Labour Market

- 2.58 The Borough performs well across a range of labour market indicators, with high relative levels of economic activity<sup>14</sup> and low unemployment, highlighting the strong resilience of the local economy and good job security. The local job market is diverse, with key international employers such as MBNA, Encirc, Vauxhall Motors and many others helping to support high levels of employment in highly-paid sectors such as finance, scientific, advanced manufacturing and professional roles.
- 2.59 The Borough is also a desirable place to live for workers in well-paid jobs in other areas, as evident in the difference between resident and workplace-based earnings. Resident-based median annual earnings within the Borough stood at £39,201, considerably higher than the North West and England and Wales earnings of £35,298 and £37,474 respectively<sup>15</sup>. This indicates that the Borough is a desirable location for living, with a high share of residents commuting to work in other areas such as Manchester, or in some cases over the border into North Wales where Airbus employs a significant workforce.
- 2.60 This presents an opportunity in the future as revised working patterns post-pandemic stabilise, with a shift away from daily commuting to a hybrid approach of home working and some days in the workplace. This change is driving requirements for larger properties with an extra bedroom capable of being converted into a home office. Overall, the labour market indicators highlight a need for a diverse housing offer that maintains recent strong levels of housebuilding to capitalise on the already strong economic foundations as the Borough navigates its demographic changes, hybrid working and economic recovery.

## Housing Market

- 2.61 Cheshire West and Chester has not escaped the symptoms of the housing market crisis with rising house prices and worsening affordability ratios that make it increasingly likely that younger residents have to move out of the Borough to find suitable housing choices.
- 2.62 House prices have increased by around 86% in CWaC over the last 20 years, and although this rate of change is slightly lower than the increases experienced in England and across the North West, the median house price is now £245,000, well above the regional average of £206,000.

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<sup>14</sup> According to the ONS Annual population Survey (2025), in the year to March 2025 there were 206,400 economically active (in or seeking employment) residents between the age of 16-64 within Cheshire West and Chester, accounting for 83.0% of 16-64 year olds in the Borough. This is a greater share than across the North West (76.7%) and England and Wales (78.7%).

<sup>15</sup> ONS (2021): Annual Survey of Hours and Earnings (2024)

Figure 2.6 Median Price Paid Comparison



Source: ONS (2025): House price to residence-based earnings ratio

2.63

This house price increase has taken place alongside housing becoming increasingly unaffordable for many, as demonstrated by a medium workplace-based affordability ratio which has risen by 0.62 in CWaC over the past 20 years to reach 6.25 in 2024. This is higher than the 5.84 ratio across the North West as a whole.

Figure 2.7 Residence-Based Median Affordability Ratio



Source: ONS (2025): House price to residence-based earnings ratio

## 3.0 **Assessing Local Housing Need**

### **Starting Point – Standard Methodology**

3.1 The new standard method for calculating local housing need is one of the central tenets of achieving the Government's objective to deliver 1.5 million homes in the current Parliament. The new method is much more ambitious than its predecessor (targeting 372,000 homes per year, up 21% from the previous target of 305,000). The new method aims to boost housing numbers by pinning targets to existing housing stock (rather than household projections, as per the former method) and then uplifting needs, and the target, based on affordability (using a 5-year average). It no longer includes a 35% uplift for urban areas and also does away with the 'cap'.

3.2 At present, the SM3 results in a local housing need figure of **1,928 dpa** for Cheshire West and Chester (considerably higher than the previous SM2 demographic-based figure of 489 dpa, and also much higher than the 2015 Local Plan figure of 1,100 dpa). The SM3 housing need figure has been generated as follows:

- Cheshire West and Chester's housing stock was 166,601 in 2024. The baseline is calculated as 0.8% of stock, therefore the housing stock baseline figure is 1,333 per year.
- The affordability uplift equates to 44.65%, based on a 5-year average median workplace-based affordability ratio of 7.35 between 2020 and 2024, calculated as follows:
  - (i) Average Median local workplace-based affordability ratio<sup>16</sup> (2020-2024) = 7.35
  - (ii) deduct 5 = 2.35
  - (iii) divide by 5 = 0.47
  - (iv) multiply by 0.95 = 0.4465 (or 44.65%).

3.3 Applying the 44.65% uplift to the stock baseline figure of 1,333 per annum equates to 1,928 dpa.

3.4 **The starting point for assessing local housing need in Cheshire West and Chester is therefore 1,928 dpa.**

### **Consideration of a different figure to the LHN generated by the Standard Method**

3.5 The NPPF is clear that to determine the minimum number of homes needed, strategic policies should be informed by an LHN assessment, conducted using the standard method in the PPG. Although the previous NPPF text suggested that 'exceptional circumstances' could justify an alternative approach which also reflected current and future demographic trends and market signals, this has now been removed from the NPPF.

3.6 Instead, alongside meeting any additional needs that cannot be met within neighbouring areas over the plan period, the requirement could be increased if it "*reflects growth ambitions linked to economic development or infrastructure investment*" [paragraph 69].

3.7 Otherwise, an alternative approach may have to be used in the PPG only:

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<sup>16</sup> ONS (2025): Ratio of median house price to median gross annual workplace-based earnings by local authority district, England and Wales, 1997 to 2024

*“Where strategic policy-making authorities do not align with local authority boundaries (either individually or in combination), or the data required for the model are not available such as in National Parks and the Broads Authority, or local authority areas where the samples are too small”<sup>17</sup>.*

3.8 This is not the case for Cheshire West and Chester.

3.9 The PPG states that calculating housing need is a separate process from establishing a housing requirement figure, which factors in policy considerations and constraints<sup>18</sup>.

3.10 However, the latest version of the NPPF is quite clear that when planning for housing and employment land, the approach should be an integrated one:

*“Planning policies should (inter alia):*

*c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment” [paragraph 86d]*

3.11 This is re-iterated later in the document:

*“To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should (inter alia):*

*e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.” [paragraph 98e]*

3.12 The remainder of this paper addresses these elements to assess whether the 1,928 dpa figure adequately supports the Council’s growth ambitions linked to economic development and whether this could justify uplifting the LHN figure generated by the standard method, as well as exploring the potential demographic, socioeconomic and housing market implications of a reduced housing requirement.

## **Demographic-led Needs**

### **Household Projections**

3.13 As set out above, the 2018-based projections have resulted in considerable upward revisions compared to the 2014-based projections.

3.14 Between 2025 and 2039 (when the 2014-based projections end), the 2014-based projections suggested an increase of 5,254 households or 375 per year, compared with a projected increase of 14,839 households or 1,060 per year in the 2018-based projections. This is driven by a combination of significantly higher population growth, change in age-cohorts and changes in household formation.

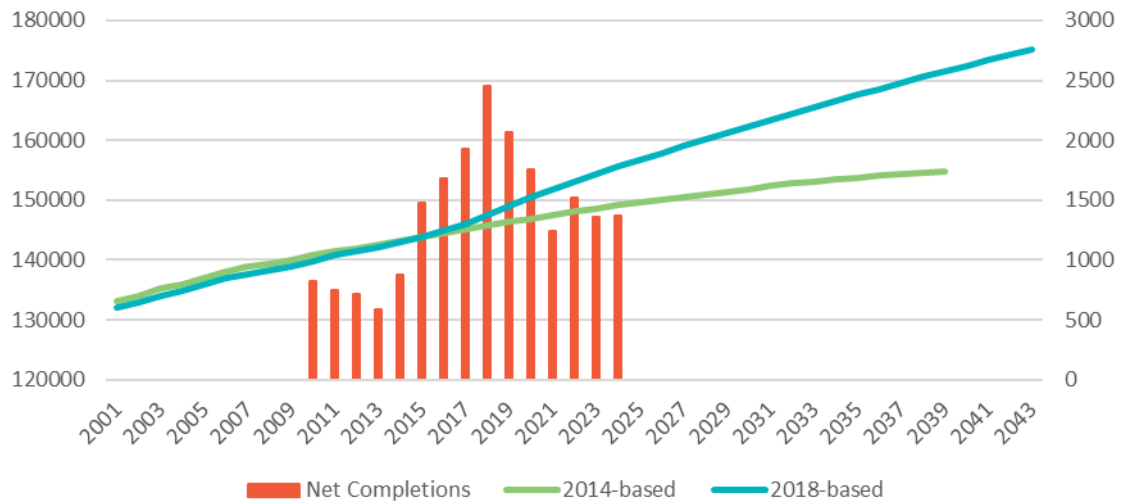
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<sup>17</sup> PPG: 2a-014-20241212

<sup>18</sup>“When preparing strategic policies, it may be concluded that insufficient sites / broad locations have been identified to meet objectively assessed needs, including the identified local housing need. In the first instance, strategic policy-making authorities will need to revisit their assessment...If insufficient land remains, then it will be necessary to investigate how this shortfall can best be planned for. If there is clear evidence that strategic policies cannot meet the needs of the area, factoring in the constraints, it will be important to establish how needs might be met in adjoining areas through the process of preparing statements of common ground, and in accordance with the duty to cooperate. If following this, needs cannot be met then the plan-making authority will have to demonstrate the reasons why as part of the plan examination”. PPG ID: 3-025-20190722

3.15 Figure 3.1 highlights the impact that net housing completions have had on household growth projections in CWaC, and particularly the stark difference between the 2014 and 2018-based projections.

Figure 3.1 Household growth projections and net completions for CWaC Borough

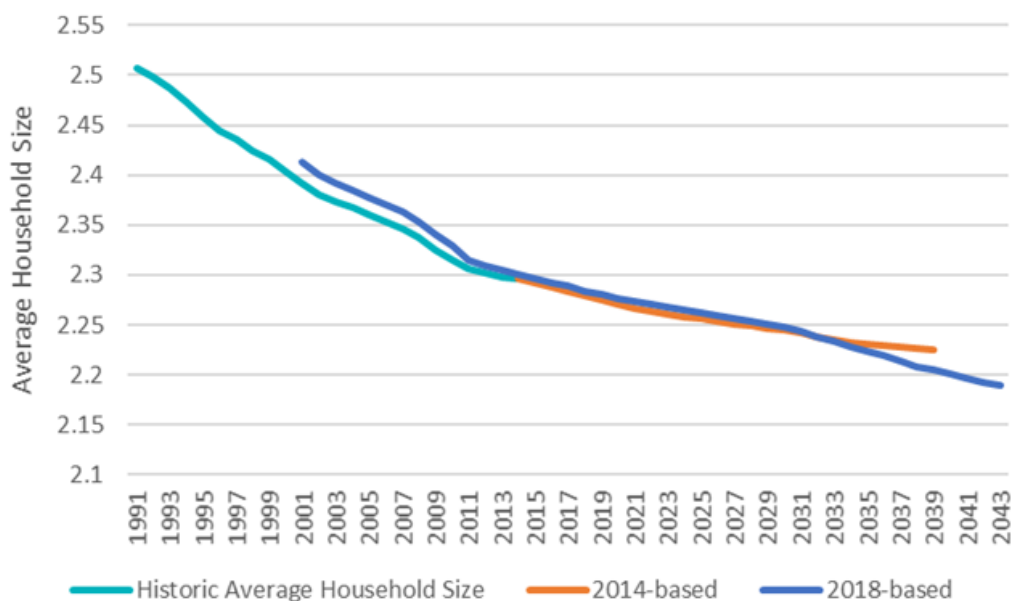


Source: CLG 2014/ONS 2018 Household Projections/MHCLG Table 122

### Household Formation

3.16 Figure 3.1 shows how CWaC’s average household size has declined historically, and how the most recent Government projections (2018-based) and the 2014-based household projections project this longstanding trend to continue. It highlights that there has been a steady decline in average household size, with the 2018-based projections showing a continuing decline in average household size.

Figure 3.2 Average household size comparison for CWaC Borough



Source: MHCLG/ONS Household Projections

3.17 Given there are historically strong levels of housebuilding in the Borough (particularly during 2017-2020) which increased the level of inward migration to CWaC, well above levels that were envisaged by the 2014-based SNPP, there is a very strong argument that without returning house building to these levels, and indeed going beyond those levels to the 1,928 dpa suggested by SM3, there is every likelihood that the Borough will continue to become increasingly unaffordable for its own residents to live in. In tandem, we will see a pronounced ageing of the overall population and concurrent reduction in the available labour force which could lead to increased levels of unsustainable in-commuting.

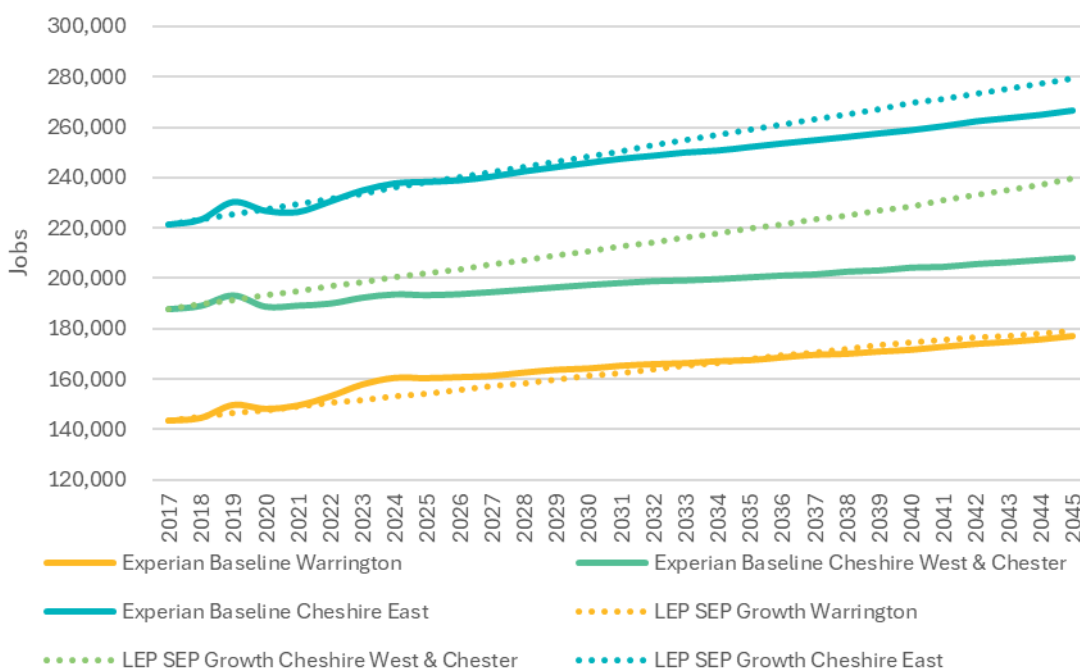
## Economic Growth Strategies / Strategic Infrastructure Improvements

3.18 The NPPF at paragraph 86d states that planning policies should “seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment”. This retains the link between integrating economic growth and housing need. There is a clear risk that where the labour force supply is less than the projected job growth, this could result in unsustainable commuting patterns and reduce the resilience of local businesses, resulting in a barrier to investment.

3.19 Ensuring a sufficient supply of homes within easy access of employment opportunities represents a central facet of an efficiently functioning economy and can help to minimise housing market pressures and unsustainable levels of commuting (and by association, congestion and carbon emissions). If the objective of employment growth is to be realised, then it will generally need to be supported by an adequate supply of suitable housing. The challenge of meeting employment needs is clearly given great importance, and the NPPF highlights this by stating that “significant weight should be placed on the need to support economic growth and productivity” [para 85].

- 3.20 In this context, it is an important part of responding to both the NPPF and the PPG that CWaC's new local plan should consider the extent to which the SM3 figure of 1,928 dpa is consistent with the economic success of the Borough and the wider LEP area.
- 3.21 The Cheshire and Warrington Local Enterprise Partnership [LEP] celebrates the fact that the Cheshire and Warrington sub-region is the best performing economy in the North of England and one of the most successful and fastest-growing economies in the country.
- 3.22 The LEP's Strategic Economic Plan [SEP] sets out the growth ambitions for the sub-region, including:
- 1 growing the economy to at least £50m of GVA per annum;
  - 2 boosting productivity per resident to 20% above the UK average; building economic resilience;
  - 3 building vibrant town centres; and
  - 4 creating a balanced housing market.
- 3.23 At the forefront of the LEP's aims is a clear ambition to significantly strengthen what is an already well functioning and successful economic sub-region. This will be supported by the potential opportunities arising from Northern Powerhouse Rail, or the HyNet North West hydrogen and carbon capture storage project, for example, which will help transform the North West region into the world's first low carbon industrial cluster and support 75,000 jobs across the country by 2035.
- 3.24 As set out in the SEP, housing is going to be a key component which underpins these economic growth aspirations. It is critical that the right numbers, type and quality of housing in the right locations and at affordable price points are provided in order to ensure CWaC's future prosperity. Delivering a functioning and balanced housing market in CWaC is vital to create the conditions to support economic growth in the sub-region.
- 3.25 The SEP includes an aspiration to deliver 120,000 net additional jobs across CWaC, Cheshire East and Warrington by 2040. Although there is no target specifically set for CWaC, there is an expected jobs growth for Warrington and if it is assumed the balance of jobs between CWaC and Cheshire East remains as it is currently, CWaC's economy would need to grow by c.40,766 jobs over the period 2024 to 2040 to align with this aspiration.
- 3.26 This economic scenario is considered alongside a more pessimistic Experian economic forecast which anticipates a growth of 10,500 jobs over the period 2024 to 2040. This is a policy-off economic forecast which is considered modest in the context of past trends in CWaC where jobs growth increased by 13,200 in the decade between 2014 and 2024.
- 3.27 Figure 3.3 plots the Experian baseline job growth forecast and the trajectory each member of the LEP needs to aim for in order to hit the LEP SEP target by 2040. It shows that Warrington has actually overshoot the SEP growth trajectory since 2017, adding 16,900 jobs in this period, with 14,100 left to add by 2040 for its target to be reached. Cheshire East has also out performed the growth trajectory to 2024, adding 16,400 jobs to 2024 against a target of 14,680.
- 3.28 On the other hand, **CWaC is lagging behind its neighbours**, adding only 5,800 jobs between 2017 and 2024 against a target for this period of around 12,400, meaning that the Borough needs to add a further c.34,970 jobs before 2040 if its fair share contribution of meeting the LEP SEP target is to be achieved.

Figure 3.3 Experian baseline and LEP SEP job growth



Source: Experian (June 2025), LEP SEP (2017)

3.29 A significant number of new homes would therefore need to be delivered in CWaC in order to support the LEP’s economic ambition and provide enough workers to fill the new jobs created by projects such as the Cheshire Science Corridor Enterprise Zone – this has the potential to attract in the order of 20,000 jobs and 500 businesses to Cheshire and Warrington through a significantly enhanced profile; attractive business incentives and the ability to retain and reinvest new business rate revenue. In CWaC, this includes sites at Ellesmere Port, Thornton Science Park and Protos.

**Previous levels of housing delivery**

3.30 Whilst CWaC is certainly not immune from the national housing crisis, in recent years the Borough has performed well in terms of housing delivery. Since the adoption of its Local Plan in January 2015, the availability of a large volume of allocated housing sites in the pipeline has helped to boost housing development, with almost 17,000 homes constructed over the past 10 years against a target of 11,000. This highlights the strength of the local market and the demand for new homes in CWaC, and the ability for the market to deliver them via a plan-led approach to strategic planning.

Table 3.1 Net Additional Dwellings in CWaC 2014/5 – 2023/24

	Net Additional Dwellings	Local Plan Target	Difference
2014/15	1,481	1,100	+381
2015/16	1,679	1,100	+579
2016/17	1,930	1,100	+830
2017/18	2,456	1,100	+1,356

2018/19	2,064	1,100	+964
2019/20	1,759	1,100	+659
2020/21	1,245	1,100	+145
2021/22	1,519	1,100	+419
2022/23	1,355	1,100	+255
2023/24	1,370	1,100	+270
Total	16,857	11,000	+5,857

Source: MHCLG (2024): Live tables on housing supply: net additional dwellings Table 122

3.31 Similarly, the latest Housing Delivery Test results were published in December 2024 and are replicated in Table 2.2 below. It highlights that a greater number of homes have been delivered in CWaC compared to that identified by the requirements; by c. 1,418 homes over the identified requirement (based on the lower household projections rather than the Local Plan target given the age of the Plan). This results in a HDT measurement of 275% for 2023 in CWaC.

Table 3.2 CWaC Housing Delivery Test 2023 Results

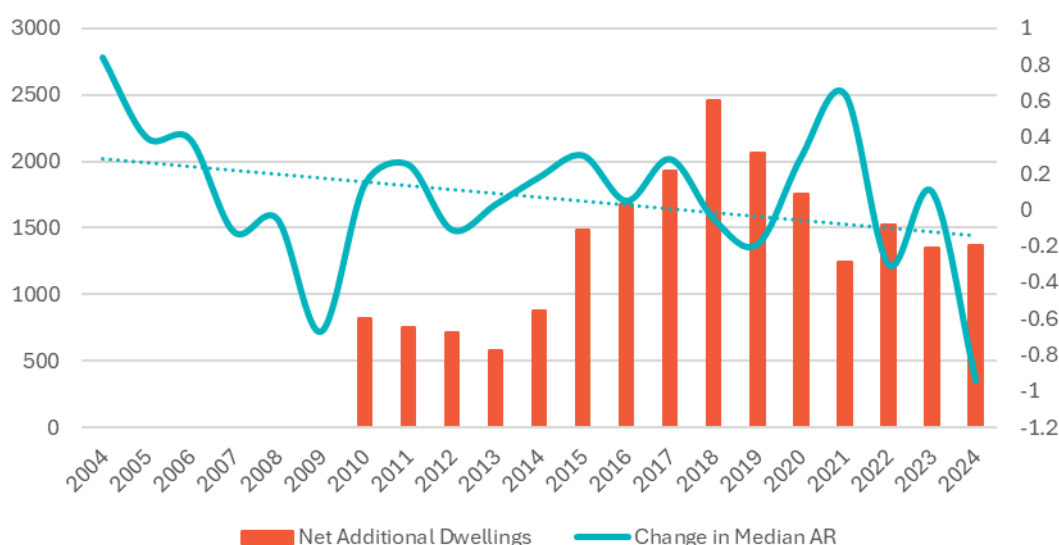
	2020-21	2021-22	2022-23
Number of homes required	389	579	560
Number of homes delivered	1281	1530	1399
Housing Delivery Test Measurements	+892	+951	+839

Source: MHCLG (December 2024): Housing Delivery Test 2023 Measurement

3.32 Interestingly, there seems to be some **evidence that the high level of housing delivery in CWaC since 2015 is starting to slow down the growth in house prices and affordability ratios**. As can be seen in Figure 3.4, the annual change in the affordability ratio has been on a downward trend, with the biggest falls coming in the years following the peak of CWaC's recent delivery of 2,456 dpa in 2017/18. Indeed, in 2024 the affordability ratio had fallen back to 6.25, which is lower than even the years preceding the 2008 financial crisis.

3.33 Although the situation is clearly very complex, it is unlikely to be a complete coincidence that CWaC's affordability ratio fell by 0.12 since 2015, whilst neighbouring authorities' ratios have worsened considerably – Warrington's increased by 0.61 and Cheshire East's by 0.57 respectively.

Figure 3.4 Housing Delivery and Affordability



Source: MHCLG (2025) Table 122/ ONS (2025): House price to residence-based earnings ratio

## Updated Assessment of Local Housing Need

3.34 In order to understand the level of future housing which would support the future growth aspirations of CWaC, Lichfields has carried out an independent assessment of the LHN for CWaC using the most recently available data, including the 2022-based SNPP, 2018-based SNHP and job growth projections from Experian (June 2025). Given 2022-based household projections are not yet available, all scenarios use assumptions around household headship rates and persons who do not live in households taken from the 2018-based SNHP which have been updated to reflect the 2021 Census.

3.35 Lichfields has modelled these scenarios and considered future housing need over the period 2024 to 2042, to align with the likely plan period of CWaC's emerging Local Plan. The scenarios modelled include:

- Demographic-led:
  - A: 2022-based SNPP Demographic Baseline
  - B: Mid-Year Estimates [MYEs]– as above but utilising the most up-to-date MYE data for 2023
- Jobs-led:
  - C: Experian forecast from June 2025
  - D: LEP/SEP economic growth ambition
- Housing-led:
  - E: SM3 (1,928 dpa)
  - F: Adopted Local Plan target (1,100 dpa)
  - G: Past delivery since Local Plan adoption (1,686 dpa)

3.36 A summary of the scenarios is shown in Table 3.3. All of the scenarios modelled show an increase in population, ranging from 20,931 under the Local Plan target scenario, to 59,826 under the Economic Growth scenario.

Table 3.3 Summary of Modelling Scenarios

	A: SNPP	B: MYE	C: Experian Baseline	D: Econ Growth	E: SM3	F: Local Plan	G: Past Delivery
Population 2024	369,819	368,900	371,918	368,562	368,900	368,900	368,900
Population 2042	414,295	413,470	393,279	428,388	419,661	389,831	410,945
Difference	44,477	44,570	21,361	59,826	50,761	20,931	42,046
p.a	2,471	2,476	1,187	3,324	2,820	1,163	2,336
Households 2024	162,113	161,473	162,538	161,354	161,473	161,473	161,473
Households 2042	193,030	192,338	182,681	199,320	195,220	180,727	190,984
Difference	30,917	30,865	20,143	37,966	33,747	19,254	29,511
p.a	1,718	1,715	1,119	2,109	1,875	1,070	1,640
Homes 2024	166,708	166,050	167,146	165,928	166,050	166,050	166,050
Homes 2042	198,502	197,791	187,859	204,970	200,754	185,850	196,398
Difference	31,794	31,740	20,714	39,043	34,704	19,800	30,348
<b>p.a</b>	<b>1,766</b>	<b>1,763</b>	<b>1,151</b>	<b>2,169</b>	<b>1,928</b>	<b>1,100</b>	<b>1,686</b>
Workers 2024	175,093	174,278	176,100	174,074	174,278	174,278	174,278
Workers 2042	200,895	200,089	186,828	209,837	204,127	184,562	198,410
Difference	25,803	25,811	10,728	35,763	29,849	10,284	24,132
p.a	1,433	1,434	596	1,987	1,658	571	1,341
Jobs 2024	192,592	191,696	193,700	191,471	191,696	191,696	191,696
Jobs 2042	220,974	220,086	205,500	230,808	224,528	203,008	218,240
Difference	28,382	28,391	11,800	39,337	32,832	11,312	26,544
p.a	1,577	1,577	656	2,185	1,824	628	1,475

Source: Lichfields/Popgroup

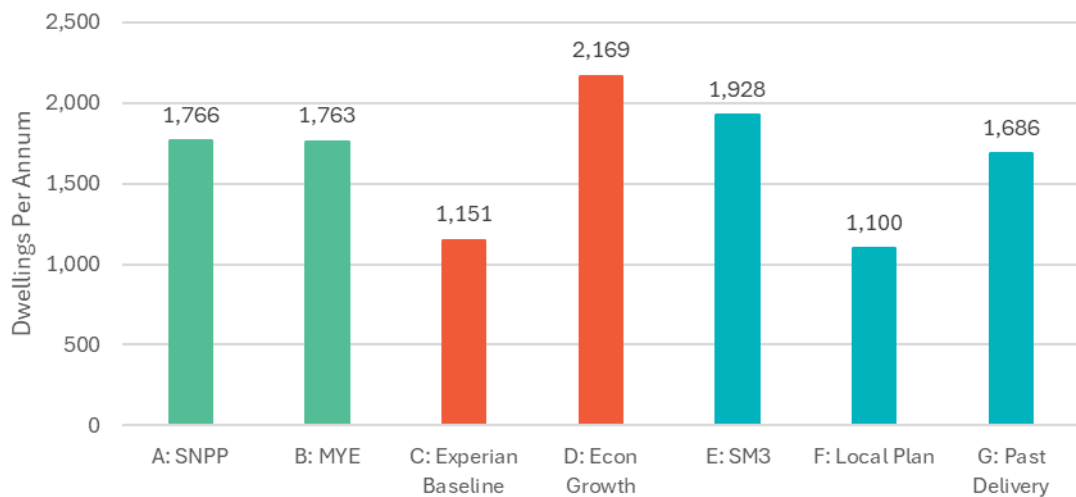
3.37 The Experian forecast (June 2025) indicates a jobs growth of c.11,800 jobs between 2024 and 2042 – generating a requirement for 1,151 dpa. It should be noted that the Experian economic forecast is considered pessimistic. This level of jobs growth is significantly lower than past trends in jobs growth and does not reflect the economic growth which took place over the 10 year period between 2014 and 2024 where CWaC experienced a jobs growth of 13,200 in the decade.

3.38 An assessment of the likely future scale of job growth has been made using Experian forecasts alongside the aspirations within the SEP. Planning for the LEP jobs growth ambitions would generate a requirement for 2,169 dpa – a scenario requiring a level of housing delivery higher than the SM3 figure. This scenario would result in a considerable growth in the labour force (35,763) which would support the projected economic jobs growth of 39,337 jobs over the plan period.

3.39 As shown in Figure 3.5, all scenarios modelled result in a housing requirement above the adopted CWaC 2015 Local Plan target of 1,100 dpa, even the pessimistic Experian Baseline scenario. The demographic-led scenarios produce housing requirements of between 1,763

and 1,766 dpa which is a level of delivery that would purely sustain the current and projected demographic shift towards on older population and a reduction in the available workforce – these scenarios are slightly higher, albeit closely reflecting, the past delivery rates which demonstrates how feasible they are to achieve. The highest requirement of 2,169 dpa results from the Economic Growth scenario, representing the level of delivery required to support the growth in the workforce necessitated by the growth ambitions set out within the SEP.

Figure 3.5 Summary of dpa figures resulting from modelling scenarios



Source: Lichfields/Popgroup

3.40

In light of our analysis, it is clear that for CWaC to achieve its economic potential, to deliver the homes it is expected to by Government, whilst at the same time addressing challenges of affordability and choice, the SM3 figure should be treated as a minimum. In fact, we would advocate targeting a higher housing annual number, linked to the economic potential of the Borough and the many direct and indirect benefits that could flow from this. The high levels of past delivery show what the market can achieve in partnership with CWaC and other stakeholders. The Consortium stand ready to work towards delivering the new housing the Borough needs now, and in future years, and supports an aspirational new local plan that seeks to deliver high levels of economic growth supported by high quality homes for its residents.

## 4.0 Impact of Reducing the Housing Requirement

### Economic Benefits

- 4.1 Utilising Lichfields' eVALUATE economic benefits methodology, the potential economic benefits of four housing requirement scenarios are set out in Table 4.1. Achieving 1,928 dpa in line with the SM3 requirement would deliver significant economic benefits to the Borough, including supporting over 5,000 direct FTE construction jobs, over 5,700 FTE supply chain jobs, over £947 million in GVA, over £48 million in resident expenditure and £4.9 million in Council Tax revenue in each year of the plan period.

Table 4.1 Direct and Indirect Economic Benefits of CWaC's Housing Requirement Targets

	<b>Adopted Requirement – 1,100 dpa</b>	<b>Past Delivery - 1,686 dpa</b>	<b>SM3 – 1,928 dpa</b>	<b>Economic Growth – 2,169 dpa</b>
Market Housing	770	1,180	1,350	1,518
Affordable Housing (at 30%)	330	506	578	651
<b>Total</b>	<b>1,100</b>	<b>1,686</b>	<b>1,928</b>	<b>2,169</b>
<b>Construction Benefits</b>				
Construction Cost	£194.3m	£297.8m	£340.5m	£383.1m
Direct FTE p.a.	2,855	4,380	5,005	5,630
Direct GVA p.a.	£236.0m	£361.7m	£413.6m	£465.3m
Indirect FTE p.a.	3,285	5,035	5,760	6,475
Indirect GVA p.a.	£304.4m	£466.5m	£533.5m	£600.2m
<b>Total FTE p.a.</b>	<b>6,140</b>	<b>9,413</b>	<b>10,765</b>	<b>12,110</b>
<b>Total GVA p.a.</b>	<b>£540.3m</b>	<b>£828.2m</b>	<b>£947.1m</b>	<b>£1.07bn</b>
<b>Operational Benefits</b>				
First Occupation Expenditure	£6.1m	£9.3m	£10.6m	£11.9m
Jobs Supported	35	55	60	70
Ongoing Resident Expenditure p.a.	£27.5m	£42.2m	£48.2m	£54.2m
Net Additional Resident Expenditure p.a.	£12.6m	£19.3m	£22.0m	£24.8m
Ongoing Jobs Supported p.a.	130	200	230	260
Council Tax p.a.	£2.3m	£3.8m	£4.3m	£4.9m

Source: Lichfields Analysis

- 4.2 If the housing requirement were to be reduced from the SM3 target of 1,928 dpa to the average past delivery figure of 1,686 dpa, we might expect to see a reduction of 1,352 construction jobs per year; £118.9 million in direct/indirect construction GVA per year; £2.7 million of resident expenditure annually; and, a loss of £500,000 in annual council tax revenues.
- 4.3 Similarly, achieving the level of housing delivery required under the economic growth scenario would see an increase in these impacts over and above the SM3 figure in the region of 1,345 construction jobs per year; £122.9 million in direct/indirect construction GVA per

year; £2.8 million of resident expenditure annually; and, an increase of £600,000 in annual council tax revenues.

## **Health and Wellbeing Benefits of New Housing**

- 4.4 This section of the reports seeks to set out the social and health benefits of new housing and how it can have a positive effect on general well-being.
- 4.5 CWaC's Regulation 18 Local Plan Issues and Options consultation sets out a vision which includes promoting wellbeing by enabling all to enjoy a safe and healthy lifestyle with a good quality of life. It goes on to recount the existing Local Plan objectives and whether these should be carried forward – these include promoting mixed and balanced communities through the provision of a range of housing to meet market affordable and specialist needs. Fuel poverty is a concern noted throughout the Borough, something that new energy efficient housing can help to alleviate through the Future Homes Standard.
- 4.6 It has long been accepted that there is a direct link between housing and health. The Healthy Urban Development Unit identify decent and adequate housing as being critically important to health and wellbeing and the NPPF highlights the importance of ensuring safe and healthy living conditions.
- 4.7 It is estimated that in 2023, up to 3.8 million homes in England failed to meet the Decent Homes Standard and, whilst this figure has fallen over recent years, it still amounts to approximately 15% of homes in the country. The situation is particularly acute in the private rented sector, where 21-22% of homes do not meet the Standard. As such, poor quality housing is a challenge faced by a huge number of families in England, including within CWaC.
- 4.8 Poor housing also has significant economic impacts. Research by the Building Research Establishment in 2023 estimates that treating patients with housing related hazards caused by poor conditions costs the NHS over £1 billion a year (cold, damp, mold and falls for example). Yet, despite its far-reaching impacts, the issue of poor-quality housing and housing inequality does not receive the attention it deserves. Consortium members recognise the importance of providing new homes that will help address these costs through high quality, sustainable new homes, for example by providing compliant Building Regulations Part M design standards, including adaptable and accessible homes.
- 4.9 The provision of new housing generates many other benefits – creating sustainable, mixed and balanced communities, expanding the opportunity for home ownership and reducing reliance on the private rented sector and potential insecurity of tenure that results, reducing hidden homelessness, mitigating affordability risks, and creating churn in the market to free up smaller properties for first time buyers and larger properties for families to occupy as elderly transition to retirement villages and care.
- 4.10 Larger housing schemes can more ably deliver the social and physical infrastructure needed to mitigate adverse impacts resulting from population increases. They allow the creation of sustainable communities with homes built to high environmental standards, across a wide range of types, size and tenures, and they can create cohesive well-planned neighbourhoods with open space, recreational facilities set within attractive and sensitively designed environments, as well as community infrastructure such as GP surgeries, dental surgeries, shops, cafes, hairdressers and a variety of other related services.

## **Crisis of Supply**

- 4.11 The Government's standard method puts the number of new homes needed in England at c.370,000 per year. In 2023/24, Government data shows the total housing stock in England increased by around 221,000 homes. The last time annual increases exceeded 250,000 was 1987. The challenge to deliver the required number of homes is therefore unprecedented in modern times.
- 4.12 The delivery of affordable housing has also fallen significantly short for a prolonged period. As of February 2025, over 1.3m households were on the waiting list for social housing in England, a figure that has increased 10% in the past 2 years (MHCLG, February 2025). There are 123,000 households in temporary accommodation (including 160,000 children) at an annual cost to the Government of approximately £2bn. The average annual affordable housing delivery in England over the past 10 years has been just over 54,000.
- 4.13 Housing need manifests itself in a variety of ways, such as increased levels of overcrowding, acute affordability issues, more young people living with their parents for longer periods, and increased levels of homelessness<sup>19</sup>. A lack of affordable housing may also negatively impact lower income families by reducing the amount they can spend addressing other health and wellbeing needs.
- 4.14 CWaC has performed well in recent years and has delivered high levels of housing which has started to reverse some of the worst extremes of affordability. Government data shows that over the 10 year period between 2013/14 and 2023/24, a total of 5,291 affordable dwellings have been completed, which represents 48% of the overall housing delivery target included in CWaC Local Plan Part One.
- 4.15 However, it must be ensured that this level of delivery can be maintained by planning for the right number of homes over the upcoming plan period, to help continue to address the issues associated with poor housing affordability. This is also particularly important in the context of recent demographic changes within the Borough and an increased need for homes for first time buyers, families and the ageing population.

## **Impact of Poor Housing Affordability**

- 4.16 The effects of poor housing affordability are both direct (causing stress and anxiety, for example) and indirect – particularly through reducing the disposable income that people have available to spend on other things which may promote good health (such as quality food and exercise). Affordability problems can also contribute to overcrowding, as households seek to share the fixed costs of accommodation across more individuals.
- 4.17 Adequate and appropriate housing may be unaffordable because rents or mortgages are high or because of high running costs associated with maintenance, energy, water and drainage and local taxes; or both. These issues can arise in all tenures, but private tenants pay the highest proportion of their household incomes on housing costs.
- 4.18 The crisis in affordable housing delivery has also driven people into poor quality homes. In England, around 23% of homes in the private rented sector fail to meet statutory minimum standards, which include being in a reasonable state of repair, with modern facilities and services and a reasonable degree of thermal warmth<sup>20</sup>. Research from the Resolution Foundation found that those in the rental sector are more likely to report issues such as

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<sup>19</sup> House of Commons Library - Tackling the under-supply of housing in England (January 2021)

<sup>20</sup> House of Commons Library (2022): Housing conditions in the private rented sector (England)

their home being in a poor state of repair, heating/plumbing/electrical issues, and damp than those who own their own home or have a mortgage<sup>21</sup>. They are also much more likely to be worried about their housing costs.

4.19 The broader negative impacts of high housing costs are significant. The provision of sub-market housing has the greatest impact on reducing poverty after housing costs<sup>22</sup>, and high rents lead to overcrowding, higher reliance on borrowing and constraints when purchasing essentials, such as food and clothing<sup>23</sup>. Struggling to meet housing costs can also lead to rent or mortgage arrears, which can lead to eviction or repossession.

4.20 These issues are compounded by a limited supply of good quality affordable housing. Conversely, provision of affordable housing as part of a mix of tenures helps to create mixed and balanced communities. Investment in affordable housing has significant benefits which include:

- 1 Promoting inclusive growth by creating jobs, increasing GVA and providing large multiplier effects;
- 2 Increasing the supply of affordable housing helps to tackle inequalities by reducing child poverty and homelessness and by providing inclusive, sustainable housing options;
- 3 Homes transferred to affordable housing providers can support the delivery of affordable and good quality homes which can improve health and wellbeing, contribute to successful placemaking and strengthen community resilience, (including rural community resilience)<sup>24</sup>.

### **Overcrowding and Homelessness**

4.21 Overcrowding - defined as when the number of occupants of a home exceed the space they could reasonably be expected to inhabit - is another measure of housing condition and is often associated with affordability. As shown in Figure 4.1 overcrowding in England has become a more widespread problem in recent years, with large increases in overcrowding in private rented and particularly social rented tenures.

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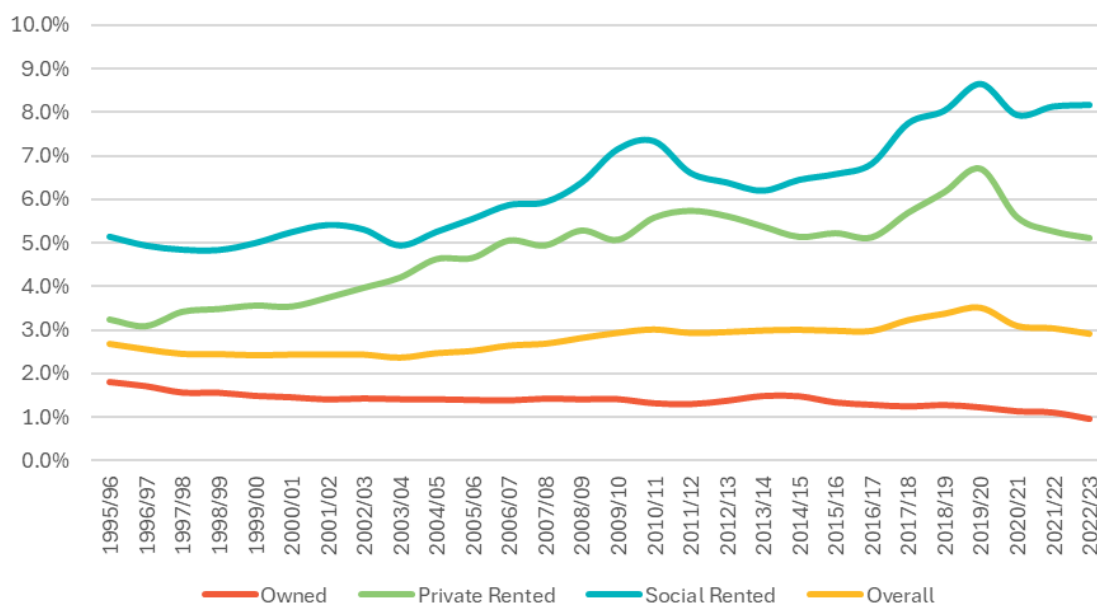
<sup>21</sup> Resolution Foundation (2023), Trying Times: How people living in poor quality housing have fared during the cost of living crisis

<sup>22</sup> Tunstall R, Bevan M, Bradshaw J, Croucher K, Duffy S, Hunter C, Jones A, Wallace A and Wilcox S (2013). The links between housing and poverty: An evidence review

<sup>23</sup> Pennington J, Ben-Galim D and Cooke G (2012) No place to call home: The social impacts of housing undersupply on young people

<sup>24</sup> The Impact of Social Housing: Economic, Social, Health and Wellbeing - UK Collaborative Centre for Housing Evidence (CaCHE) and Housing Associations' Charitable Trust (HACT) (August 2020)

Figure 4.1 Overcrowding in Rented Tenures in England

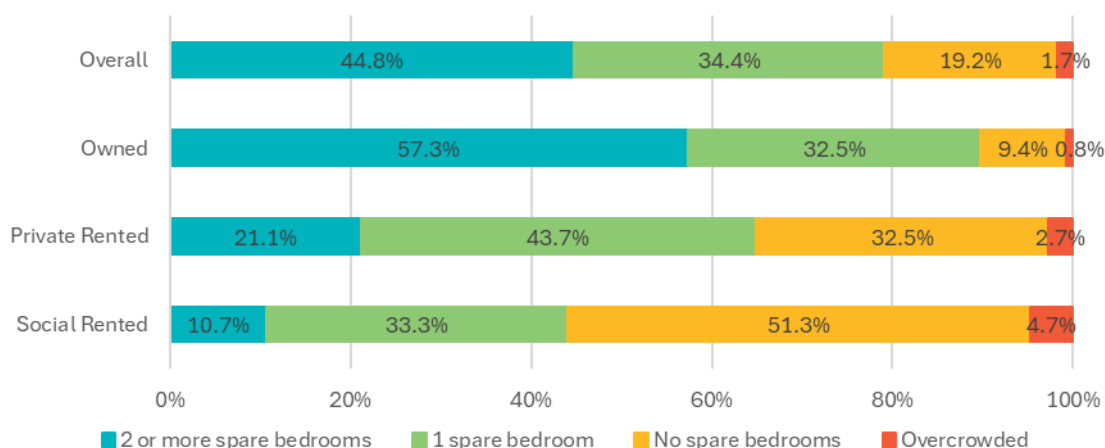


Source: MHCLG, English Housing Survey 2023

4.22 Overcrowding remains highest in the social rented sector (8.2% in 2022/23) but has increased strikingly in private renting (from 3.2% in 1995/96 to 5.1% in 2022/23). As private renting has expanded and housed more of the poorest households, so overcrowding has become a greater problem within the tenure.

4.23 As shown in Figure 4.2, overcrowding remains a clear issue in CWaC, with 2.7% of private rented accommodation and 4.7% of social rented housing households living in overcrowded conditions.

Figure 4.2 Statistics on Overcrowding in CWaC



Source: Census (2021): Tenure by occupancy rating (bedrooms)

4.24 Housing has a significant influence on mental health and wellbeing - children living in crowded homes are more likely be stressed, anxious and depressed, have poorer physical health, and attain less well at school. Distress is generally higher for overcrowded households, and data from the Covid-19 pandemic period seem to show this intensifying

during the more severe lockdown in April 2020, when 39% of people in overcrowded households were indicating psychological distress.

4.25 The factors relating to issues of homelessness within the population are highly complex, though it is recognised that a shortage of good quality affordable housing and the high costs associated with private renting can lead to issues of homelessness<sup>25</sup>.

4.26 Homelessness is an issue which is present in CWaC, with 476 households assessed as being owed prevention or relief duty in the year to March 2025<sup>26</sup>. The CWaC Housing Strategy 2025-2035 consultation states that all forms of homelessness have increased in CWaC over the last five years. It reports that the number of households in temporary accommodation has increased significantly since January 2019, peaking recently in January 2024. Of the 226 households in temporary accommodation, 178 (79%) were in hotel accommodation, generating significant costs for the Council. At the heart of the problem is an overall lack of affordable housing, and CWaC must seek to maintain its high levels of affordable housing delivery to help ensure that this level of homelessness can be reduced.

### **Provision of Affordable Housing**

4.27 According to the CWaC Housing Strategy 2025-2035 consultation<sup>27</sup>, as of 31 March 2024 there were 6,735 households registered on the housing waiting list. This number is broken down into bands, as follows:

- Band A (urgent housing need): 240 households
- Band B (high housing need): 1,589 households
- Housing Options Band (HOB; no statutory preference): 4,906 households

4.28 As previously set out in Table 4.1, achieving the SM3 target of 1,928 dpa would infer the delivery of 578 affordable dwellings each year (i.e. 30%, as per adopted Local Plan Policy SOC 1), which could potentially provide accommodation to just 8.1% of households on the housing waiting list. Under the current adopted Local Plan target of 1,100 dpa this would fall to 330 affordable homes per year, or alternatively, a much higher 651 affordable homes per year if the level of housing delivery required to support the LEP's economic growth ambitions is realised.

4.29 The 2013 CWaC Strategic Housing Market Assessment [SHMA] demonstrated a need for 714 affordable dwellings per annum. Data on additional affordable housing delivery shows that around 5,291 additional affordable homes have been delivered in the Borough between 2013/14 and 2023/24 at an average of 481 per annum<sup>28</sup>, implying under delivery of around 2,563 units against the SHMA target. Clearly, the need for affordable housing is another reason why the SM3 target of 1,928 dpa should be viewed as a minimum.

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<sup>25</sup> <https://www.crisis.org.uk/ending-homelessness/housing/>

<sup>26</sup> MHCLG (2025): Live tables on homelessness

<sup>27</sup> <https://participatenow.cheshirewestandchester.gov.uk/housing-strategy-consultation-data-snapshots?>

<sup>28</sup> MHCLG (2025), Live tables on affordable housing supply Table 1008c

## 5.0 Conclusion

- 5.1 The purpose of this Research Paper is to help inform the Council's early decision making on its overall spatial planning strategy for its new local plan, particularly with regards to the scale of housing required to meet its needs, as well as economic and social objectives.
- 5.2 Significant changes have occurred politically and economically over the past 12 months, with a newfound focus from the Government on boosting housing delivery and addressing the housing crisis, principally through changes to the planning system and the move to a new stock-based Standard Methodology for determining Local Housing Needs.
- 5.3 The Consortium, comprising Barratt / David Wilson Homes, Redrow Homes and Taylor Wimpey, is eager to see a new Local Plan that is positively prepared and aspirational. It is vital that CWaC seizes the opportunity to review its Local Plan at this time to ensure it can respond to the acute housing and affordability crisis, the recent and future projected changes in the economy, and as a minimum, plan for the levels of housing across the area expected by Government, or indeed going beyond that level where justifiable to further the economic prospects of the Borough and life chances of its residents.
- 5.4 The Borough faces a number of challenges, including a rapidly growing and aging population which will see the proportion of working-age residents shrink and a greater share of residents above retirement age if current demographic trends continue. CWaC's population will grow at a faster rate than any of its neighbouring authorities as well as relative to the wider regional and national projected growth rates. This presents a significant economic opportunity for the Borough and a need to ensure that sufficient housing is provided so that this growth potential is not constrained. Similarly, the Borough is likely to see an increased number of families with children and will need to plan accordingly for larger housing.
- 5.5 The Borough has not escaped the symptoms of the housing market crisis with rising house prices and worsening affordability ratios that make it increasingly likely that younger residents have to move out of the Borough to find suitable housing choices. However, housing delivery has been healthy since the adoption of the current Local Plan in 2015 (averaging 1,686 dpa). This consistent level of recent delivery demonstrates that the market is capable of achieving the housebuilding needs set by Government, and there is evidence that the recent high level of housing delivery is starting to slow down growth in house prices and affordability ratios in this Borough.
- 5.6 The standard method figure of 1,928 dpa should therefore be treated as a minimum, because:
1. The NPPF clearly states that local plans should meet the development needs of their area and as a minimum provide for the objectively assessed needs for housing. Numerous Inspectors at local plan examinations have supported this position.
  2. Housing needs can now expressly justify exceptional circumstances for Green Belt release, and it is mandatory for LPAs, if necessary, to alter Green Belt boundaries when they cannot fully meet housing requirements (unless there is evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan).

3. Housing need modelling scenarios which maintain current demographic trends, including an aging population, suggest a housing requirement of at least 1,763 dpa, whilst a scenario which aligns economic growth and housing needs in line with LEP growth aspirations suggests a requirement of at least 2,169 dpa. These two scenarios straddle the SM3 figure of 1,928 dpa.
4. There are potentially significant economic benefits of pursuing at least the 1,928 dpa figure which will not be realised if a lower requirement is set, including:
  - a. Over £340m in capital investment p.a.;
  - b. Over 10,000 FTE direct and indirect construction jobs p.a.;
  - c. Almost £950 million in economic output p.a.;
  - d. £22m in resident expenditure p.a.; and
  - e. Council Tax revenue of £4.3m p.a.

The benefits associated with pursuing a more positive economic growth-led housing requirement would be even higher. This needs to be considered against a context of CWaC falling behind its neighbours when it comes to job growth over recent years.

5. CWaC's population is projected to grow at a faster rate than any of its neighbouring authorities as well as relative to the wider regional and national projected growth rates. This presents a need to ensure that sufficient housing is provided so that this growth potential is not constrained.
6. Despite high levels of housing delivery over recent years, there remains a crisis of supply nationally and regionally, and a very challenging affordability gap, both of which can be addressed, or at least slowed, by delivering more housing.
7. Despite high levels of affordable housing delivery, there remains an acute need for new affordable homes to address significant housing waiting list numbers and rising levels of homelessness. The cost of temporary accommodation is having an unsustainable impact on the public purse.
8. High levels of homebuilding will create churn in the market, providing opportunities for first time buyers, growing families or downsizers, and new forms of retirement and care for the ageing population.
9. High levels of new home provision will help to deliver better health and wellbeing outcomes for residents – for example, by addressing overcrowding and the associated mental health toll this can generate, providing greater choice in housing tenures, type, size and location, delivered to modern high efficiency standards which in turn reduces the burden on NHS resources and addresses other related issues such as fuel poverty and cost of living.

5.7 The Consortium urges CWaC to adopt a minimum housing target for the new local plan period derived from the standard method figure of 1,928 dpa. The Consortium looks forward to working with CWaC during future stages of the local plan preparation to ensure that suitable sites can be allocated to meet this level of need.

# Appendix 1

- A1.1 Infographic: The annual economic benefits of pursuing a SM3-based housing need target in Cheshire West & Chester

# Cheshire West and Chester



Barratt / David Wilson Homes, Redrow and Taylor Wimpey have significantly boosted housing choice and supply in Cheshire West and Chester over recent years. Their housing developments have supported the local economy through job creation and the supply chain, whilst also boosting the public purse through CIL and s106 contributions to improve local facilities and increase Council revenue. These economic benefits can be optimised by pursuing an objectively assessed housing target in the new local plan, based on the SM3 need figure.



over **1,928** New homes including **578** affordable homes



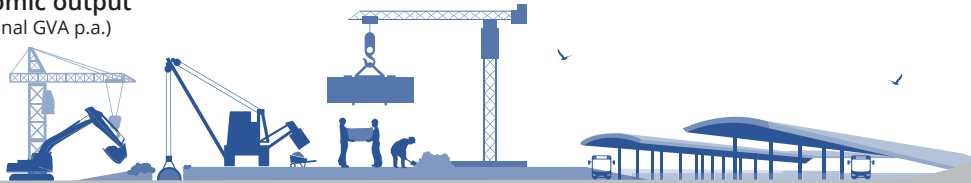
## Construction benefits

**£340.5m**  
Construction value  
(total construction cost)

**5,005 Jobs**  
Direct FTE  
construction jobs  
(p.a.)

**5,760 Jobs**  
FTE supply chain  
jobs p.a.  
(indirect/induced "spin-off" jobs supported)

**£947.0m GVA**  
Economic output  
(additional GVA p.a.)



## Operational and expenditure benefits

**£10.6m**  
First occupation  
expenditure  
(spending to make a  
house 'feel like a home')

**£22m**  
Resident  
expenditure  
(within local shops and  
services p.a.)

**290 Supported jobs**  
(from increased expenditure  
in local area)



## Local Authority revenue benefits

**Planning contributions**  
(s106 Contributions)

**Education**

**Healthcare**

**CIL Contributions**

**Infrastructure**

**Open Space/ Sports**

**£4.3m**  
Council Tax revenues  
(p.a.)





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