

Planning Department
Cheshire West and Chester Council
The Portal
Wellington Road
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Our ref: 65435/03/SPM/BG/34094601v1

Dear Sir / Madam

Representations to Cheshire West and Chester Local Plan Regulation 18 Issues and Options Consultation: Land at Beach Road, Hartford

On behalf of our client, United Utilities Property Services [UUPS], we are pleased to make representations to Cheshire West and Chester [the Council] on the Local Plan Issues and Options Consultation Draft (Regulation 18) [LPIO]. These representations have been prepared in the context of UUPS's interest in Land at Beach Road, Hartford [the Site]. The Site adjoins the existing settlement of Northwich on the edge of the urban area of Hartford.

The Site and Surroundings

The Site adjoins the settlement boundary of Northwich on the edge of the urban area of Hartford. The settlement boundary is largely defined by Beach Road, with some exceptions for pockets of development to its north. The Site is located to the north of Beach Road within the Green Belt and is wedged between residential estates to the west including the Grange Junior School (located outside of the settlement boundary, within the Green Belt) and to the south-east including Hartford Methodist Church (located outside of the Green Belt within the settlement boundary). Fields and trees bound the Site to the east, north and north-west. The area to the north appears to be in use as a golf course. The golf course includes all the land to the north and wraps around the Site and the existing residential estate and school to the west. Overall, the Site's perimeter is defined by hedgerows / trees.

The Site is approximately 7.98ha and is segregated in the southwest by a single-track road (Grange Drive) which provides access from Beach Road north-westwards to a number of residential dwellings. The track is lined with tree cover on both sides. The position of the road isolates the south-west of the Site. This is bound by Grange Drive to the east, Beach Road to the south, Beachwood Avenue to the east and the plot boundaries of residential properties to the north. This area is largely flat and is occupied by dense tree cover. With regards to the rest of the Site, to the north-east of Grange Drive, this comprises an area of two open fields separated by fencing including a mature tree. This area is also largely flat and is bound by trees along the north-western, southern and south-eastern perimeters of the site. To the north-east of this area are further fields, with dense tree cover in the south-western half (which

continues beyond the northwestern boundary of the Site) and more open fields to the north-eastern half. The area is also bound by trees along the north-eastern and south-eastern perimeters of the site. This area appears to slope down towards the north by c. 25m.

The Site adjoins the existing settlement of Northwich which is identified as one of the four main urban areas within the settlement hierarchy as defined by the Local Plan (Policy STRAT2). New residential development is directed to these areas. The Site is located in a highly sustainable location c.1km west of Greenbank Train Station which serves the line between Manchester and Chester. Methodist Chapel Bus Stop is also located just south of the Site along Beach Road which serves bus routes 1 and 48 between Northwich and Weaverham / Frodsham. The local area also hosts a food convenience store, a Post Office, and several primary and secondary schools.

The Site is shown in red on Figure 1 below. The approximate extent of the existing Green Belt boundary is also illustrated in green shading with a green edge. The area outside of the green shading comprises the urban area of the settlement of Northwich.

Figure 1 Approximate Green Belt Boundary



Source: Lichfields / Google Earth

The Site is located in Flood Zone 1. There are no listed buildings on the Site or within close proximity. Tree Preservation Orders have been served on a number of the trees on the Site. Parts of the Site are designated ecological networks by Local Plan Policy DM44. Overall, the Site is not subject to any significant technical or environmental constraints that would prevent it coming forward for housing development. The Site can be appropriately designed to take account of any ecological or landscape constraints.

If allocated, UUPS intend to obtain planning permission for residential development for delivery by a development partner within five years. The Site has an estimated capacity of 210 dwellings at a density

of 35 dwellings per hectare. Therefore, it is considered that the Site presents an excellent opportunity to assist the Council in meeting its housing needs over the Plan period.

Response to the LPIO

The content of the LPIO document has been reviewed and the following response prepared in the context of UUPS's land interests and the Council's need to deliver an increased level of housing to reflect Standard Method 3 [SM3].

Housing Needs

Policy SS1 (Housing Needs) suggests that the Council should plan to deliver 1,914 new dwellings per annum [dpa], as a minimum, over the plan period (15 years). This is based upon the SM3 figure and represents a significant 260% increase from the previous SM figure, and a 74% increase from the current Local Plan housing requirement (1,100 dpa). Over the 15 year period this equates to 28,710 dwellings.

A substantial amount of development will be necessary to meet this requirement. The Council's Stage One Land Availability Assessment [LAA] report suggests that 502 potential sites have been identified that could deliver approximately 29,500 units. However, this figure is based upon the application of generic site density assumptions and has not taken into consideration site-specific constraints which may reduce the developable area and hence reduce realistic capacity. Additionally, land availability and achievability were not factored in. Therefore, it is anticipated that this figure will reduce significantly once a Stage Two assessment is completed. This would suggest the need for additional, deliverable sites, such as Land at Beach Road, to be allocated for residential development.

Further to this, the Council's housing need figure has increased to 1,928 dpa since the initial release of SM3 figures last year. This reflects updated housing stock data and affordability ratios released in March 2025. UUPS requests that Policy SS1 is updated prior to publishing the draft plan to reflect the most up-to-date figures.

Paragraph 22 of the National Planning Policy Framework [the Framework] states that "*strategic policies should look ahead over a **minimum** 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities*" [my emphasis].

It is noted that some of the sites indicated for development to date are large and complex. It is therefore anticipated that delivery timescales may be lengthy and extend beyond the suggested plan period. To increase the potential for the necessary housing delivery, UUPS would support an extended plan period.

UUPS does not support a stepped housing requirement and does not believe that this approach is justifiable. Given the high quantum of housing needed, it is believed that the Council should plan to deliver in full the annual housing requirement from the beginning of the plan period. There are available and achievable sites, such as Land at Beach Road, which could be delivered early in the plan period to contribute towards the need for nearly 30,000 dwellings. A stepped approach poses a danger of falling short of this need. The Council should plan positively to deliver the necessary housing growth to avoid this possibility.

Spatial Strategy

The proposed approach to Policy SS3 (Spatial Strategy Principles) seeks to direct new development towards the most sustainable locations with access to existing services and infrastructure. UUPS agrees with this in principle. However, the proposed Policy strongly prioritises the development of previously developed sites within settlements. UUPS raises concern that this may be overly restrictive noting the known challenges in finding and viably redeveloping previously developed sites. This could result in a shortfall against the identified housing need which would have detrimental impacts to the Council and the area's residents.

UUPS supports the Council's consideration of green belt sites on the edges of existing settlements where these are sustainably located. It is considered that this will be necessary to allow the Council sufficient flexibility to deliver the required housing growth over the plan period.

Policy SS4 (Settlement Hierarchy) identifies Northwich as a main town which provides infrastructure and services for its larger population and surrounding area. UUPS agrees that Northwich should be identified as a main town. However, it notes that Hartford is inextricably linked with Northwich and should be identified as part of this main town for clarity to ensure that development in Hartford is not unnecessarily restricted. UUPS supports the growth of Northwich and linked settlements including Hartford.

UUPS supports the proposals for a place-based policy for each settlement but would request the opportunity to comment on the proposed approach at the relevant time to ensure sufficient flexibility is afforded to promote sustainable housing growth in and around existing settlements.

Growth Options

Policy SS5 outlines three growth options for the distribution of development across the Borough:

- a Retain the Green Belt
- b Follow current Local Plan level and distribution of development
- c Sustainable transport corridors

Option A focuses new development on areas outside the Green Belt, including 5,000 homes south of Northwich. This option would retain the Green Belt and would avoid any release through the new Local Plan.

Option B follows the existing Local Plan strategy, with most development directed to within, or on the edges of, the main urban areas and smaller settlements with adequate services and facilities. This option includes the release of Green Belt land given that there is a much more limited supply of previously developed land now than when the existing Local Plan was prepared. It proposes large urban extensions around Northwich and other key settlements.

Option C focuses new dwellings around settlements on the railway network or bus route corridors. Modest urban extensions would be sought around Northwich and green belt release would accommodate over 12,000 dwellings.

UUPS is supportive of Options B and C which prioritise development in sustainable locations and don't restrict development in locations within the Green Belt which are otherwise logical and sustainable, such as Land at Beach Road. The Framework makes provisions for the release of Green Belt land where this is required to meet identified housing needs (Paragraph 146), and so it is considered illogical to prevent this possibility when it could result in sustainable housing growth. Much of the borough, particularly in the north, is constrained by Green Belt, despite many sites being located on the edge of main towns or other sustainable settlements. Preventing housing development on all Green Belt land would, therefore, greatly restrict the borough's development potential. Option A is not supported by UUPS on this basis.

Map 5.6 within the LPIO document shows the potential growth areas around Northwich. Several sites are identified for housing development, including sites to the south and west of Hartford (NOR08 and NOR09). UUPS supports the principle of housing growth around Northwich, but requests that an additional area is added as a growth option. Land at Beach Road is well positioned adjacent to the existing settlement boundary and in close proximity to existing services and facilities, including a train station and bus stops. Therefore, the Site is considered to be appropriate in relation to both growth Options B and C.

The results of the Stage One assessment (as listed in the LAA Stage One Update 2025 Housing Excel File) suggest that the Site was excluded from the LPIO document due to more than 10% of the Site being located within the Green Belt. No other initial constraints were identified. Given that two of the growth options allow for development on Green Belt land, it is not clear why the Site has been fully discounted at this stage.

Additionally, the Stage One results do not refer to grey belt policy. In the case of Land at Beach Road, it is considered that the Site should be considered a grey belt site which would remove the Green Belt constraint. In accordance with Paragraph 148 of the Framework, where it is necessary to release land within the Green Belt for development, priority should be given first to previously developed land, followed by grey belt land that has not been previously developed, and finally to other Green Belt locations.

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*". The Site does not comprise previously developed land, but it is not considered to strongly contribute towards the relevant purposes of the Green Belt, as outlined below. There are not considered to be any Footnote 7 assets or areas that would provide a strong reason for refusing or restricting development.

Green Belt Purpose (a) - To check the unrestricted sprawl of large built up areas.

The Site lies immediately adjacent to the existing urban area of Hartford. It is located in a visual gap between the defined settlement of Northwich to the east and south and an existing residential estate to the west. The Site comprises land that is already encompassed by built development on three sides and is visually and physically contained. The golf course to the north further assists within the containment of the Site and neighbouring development to the west.

Taking the Site together with the adjoining Green Belt land to the northeast, this sits within a nook of Green Belt land which could be explored for release together should a larger site in this location be required to meet identified needs. Should the Site and any other adjoining land come forward for residential development, it would not result in any sprawl of the urban area given it is well contained between existing development.

Green Belt Purpose (b) - To prevent neighbouring towns merging into one another.

Should the Site come forward for development, there is still a significant Green Belt gap between the urban area of Hartford and the urban area of area of Weaverham to the west (both forming part of the same settlement of Northwich). Taking account of the residential estate and school to the west, a gap of c. 750m is still maintained between Weaverham and Northwich.

The extent of the urban area would not be changed by the development of this Site (either taken alone or together with adjoining land to the north-east given its position within a nook), and nor would the gap between the settlements be reduced. The existing residential development to the west provides the existing delineation of the extent of the settlement. The development of this Site would not extend the development beyond the existing built envelope.

Green Belt Purpose (d) - To preserve the setting and special character of historic towns.

Northwich is not a historic town as defined for the purposes of the Framework. The Site is therefore not considered to have any contribution to the setting and special character of historic towns.

On this basis, we are of the view that the Site would meet the definition of grey belt and so could be considered for release from the Green Belt to meet the Council's housing needs.

Northwich Area Approach

Policy NO1 sets out the proposed approach to development in Northwich, the borough's third largest urban area when including surrounding settlements. It identifies that Northwich is a strategic focus for development which UUPS agrees is a logical strategy. The policy will identify key locations for new housing development in Northwich, in line with the chosen option as set out above. The LPIO document sets out that this may mean exploring the potential for residential development in areas outside of existing settlements, which may mean developing on Green Belt land. UUPS supports this approach to help the Council meet its housing need.

As set out above, UUPS requests that the surrounding settlements which make up the Northwich urban area are identified within the policy wording for clarity. This includes Hartford.

UUPS requests that a minimum specified level of new development within Northwich and the surrounding settlements should be set to create a positive policy framework for growth. Any infrastructure required to support the targeted levels of growth should be clearly identified and evidenced within the policy wording so that developers are aware of the associated contributions required, and associated triggers, to facilitate development.

Housing Policies

Chapter 19 includes the proposed approach to housing policies including housing mix and affordable housing.

The approach to housing mix is set out in Policy HO1 (Mix and type of housing in new developments and specialist housing). This suggests that housing mix will reflect a Housing Needs Assessment [HNA] which will be prepared. Detailed policy requirements will be provided in terms of tenures, housing for the elderly and for residents with disabilities. UUPS supports the use of an HNA to support its policy preparation. However, it would be preferable to ensure an adequate level of flexibility within the policy wording where alternative mixes are justified based on local circumstances. This could be achieved through the application of percentage scales rather than overly prescriptive requirements. UUPS considers that this would better account for viability issues and local market conditions and needs.

Policy HO2 (Delivering affordable housing) will provide the percentage of affordable housing to be provided on sites over 10 dwellings. It outlines the potential for sub-area variation in affordable housing requirements.

UUPS is supportive of affordable housing provision in principle and understands the need for this to be controlled by policy, with 10 dwellings considered an acceptable threshold. It is considered that the policy should also outline the proposed mix of affordable housing tenures that should be provided, and that this should be evidenced by the HNA. Once again, the policy should allow some flexibility for viability considerations and the proposal of alternative arrangements where justified. UUPS supports the potential for offsite contributions to be provided in exceptional circumstances to ensure deliverability.

Infrastructure and Developer Contributions

Proposed Policy ID1 (Infrastructure and developer contributions) aims to ensure that infrastructure requirements and contributions are embedded in development plans, including for transport, education, environmental protection and social infrastructure.

UUPS agrees that contributions may be required to facilitate new housing development. However, as per Paragraph 58 of the Framework, obligations should only be sought where:

- a necessary to make the development acceptable in planning terms;
- b directly related to the development; and,
- c fairly and reasonably related in scale and kind to the development.

Policy ID1 should account for this, alongside viability issues. Viability must be considered to ensure that proposed obligations are proportional and don't reduce deliverability. The anticipated infrastructure requirements should be outlined in an Infrastructure Delivery Plan in the context of the identified growth areas and associated scale of development necessary to meet the Council's identified housing need.

Design

The proposed Policy approach to design is set out in Policy DS1 (High Quality Design). It is proposed that development should, amongst others, respect local character, provide a high quality public realm, promote safe, secure environments and consider legibility and ease of movement. Development should meet applicable design guides or codes which have been locally or nationally prepared.

UUPS is supportive of the Council's approach towards design and agrees that design and construction should be sustainable and high quality. The policy wording and any borough-wide Design Code, should one be produced, should not be overly prescriptive so as to prevent placing unnecessary requirements on developers which may negatively impact viability.

Biodiversity

Proposed Policy GI1 (Green infrastructure, biodiversity and geodiversity) sets out the approach to safeguarding and enhancing biodiversity, geodiversity, green infrastructure and protect designated sites. New development under the proposed policy should deliver a net gain in biodiversity, and protect designated sites, protected species and geodiversity. The Policy will combine four existing policies to create one, streamlined policy. UUPS agrees that this is a logical approach.

UUPS supports the delivery of biodiversity net gain in line with national policy. In line with Planning Practice Guidance [PPG] (Paragraph 006, Reference ID: 74-006-20240214), UUPS contends that a policy requirement for a gain of over 10% should not be implemented.

UUPS supports the use of a Local Nature Recovery Strategy [LNRS] to guide opportunities for nature recovery.

The inclusion of Sustainable Drainage Systems is also supported, where this is appropriate and achievable within the parameters of an individual site.

The approach to tree cover is generally supported, but UUPS reiterate that viability should be accounted for in the delivery of additional ecological enhancements over and above the 10% biodiversity net gain requirement.

Summary

UUPS supports the preparation of a new Local Plan for Cheshire West and Chester. It is requested that its land interest at Land at Beach Road, Hartford is reconsidered as a growth option for Northwich through a formal allocation in the Local Plan. The Site is available, achievable, and in a suitable and sustainable location for housing development, adjoining the identified growth area of Northwich. The only constraint identified by the Council in the Stage One LAA was the Site's current Green Belt designation. As set out in this letter, it is considered that the Site meets the definition of Grey Belt and so should be reconsidered for development. The inclusion of the Site will contribute towards meeting the Council's increased identified housing needs.

We trust that these representations will be fully considered as the draft Plan progresses and would be grateful to be kept informed of the next stage of consultation.

LICHFIELDS

Yours faithfully

Becca Gray
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MPlan