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CHESHIRE WEST AND CHESTER COUNCIL - REGULATION 18 LOCAL PLAN ISSUES AND OPTIONS 2025

SECTION 1 - INTRODUCTION

Marrons have been instructed to submit this representation, on behalf of our client, Ashall Land ('the Client'), to the Cheshire West and Chester Local Plan Issues and Options (Regulation 18) consultation.

The Site

The Client controls for a 3.44ha parcel of land at Green Lane in Davenham ('the Site') (LAA ref: 0883), which falls within the spatial planning area of Northwich. It is a relatively small, narrow green space and located between the existing new development at Green Lane and the A556 bypass, and the proposed residential development will infill underutilised land within the existing developed urban area.

Stage One of the Council's Land Availability Assessment (2025) estimates the Site's developable area to be 2.75ha (~96 units using a density assumption of 35 DpH) and considers the site as 'suitable' for potential residential development.

Northwich Urban Area

Northwich is the third largest urban area in Cheshire West and Chester. The adopted Local Plan defines the Northwich urban area as the town of Northwich and adjacent settlements of Anderton, Barnton, **Davenham**, Hartford, Lostock Gralam, Lower Marston, Lower Wincham, Rudheath and Weaverham (see Policy N1 and para 4.5 in the Local Plan Part 2 (2019)). The Issues and Options (Reg 18) consultation document maintains this long-established understanding of Northwich town and the listed adjoining settlements combining to form this defined urban area in the borough.

Green Belt constrains the north of Northwich and land release would be subject to exceptional circumstances including the assessment of alternative options. As such, we encourage the Council to consider all potential development opportunities within the Northwich. This includes within and on the periphery of Davenham, which is a higher priority than any Green Belt release.

The Client is highly supportive of a spatial strategy that enables development in the Northwich urban area, and Davenham itself as a sustainable centre.

SECTION 2 - RESPONSE TO CONSULTATION QUESTIONS

Section 2 outlines our response to the CW&C Reg 18 (Issues and Options) 2025 consultation questions with relevance to our client's site. To limit the length of this submission, all 'no comment' answers have been excluded.

1 Introduction

Question IN 1 Do you agree that this is the right evidence that we need to inform the new Local Plan? Is there further evidence that you think will be required?

We welcome the additional evidence listed at 1.19, particularly the Housing Needs Assessment, Strategic Viability Assessment, Land Availability Assessment, and Infrastructure Delivery Plan. We note that a Strategic Housing Market Assessment (SHMA) and an Integrated Impact Assessment (IIA) are not listed here and suggest these additional assessments are undertaken by the Council.

Additionally, we recommend a Landscape Study / Strategy, which should include the review of Key Settlement Gaps (KSG) outside of the Green Belt, is included in the evidence base for the new Local Plan. The current Landscape Strategy (Part 1 and Part 2) includes local landscape designations dating back to the Vale Royal Local Plan (2006) evidence base and is therefore in need of a comprehensive update. This will help inform the Council's approach policies on potential growth in specific areas such as Northwich, which are currently constrained by existing policies.

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

We agree with the Council's proposed 15-year period for the new Local Plan, although the actual dates are not stated in the consultation document. The latest Local Development Scheme suggests that the new Local Plan will not be adopted until the end of 2027 at the earliest. Therefore, 15 years will be up to end of 2042, or even March 2043 to allow for a full final reporting year.

Given that the Local Plan is also commencing from a start date of 2025, including the various evidence base documents, it would be prudent for the Council to plan for an 18-year period from

now. Housing and employment need assessment work will need to cover the corresponding timetable.

2 Vision

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

Yes, we agree with the suggested approach towards the new Local Plan vision, particularly the place-based approach to visions for each key settlement, including Northwich. The vision could be strengthened by re-iterating that sustainable development is at the heart of the new plan, in alignment with proposed Policy SD1.

Question VI 2 Should the vision include/establish a set of principles and priorities? Are these the right ones – do you have any other suggestions?

Yes, the vision should include overarching principles, and the four priorities listed (climate change; wellbeing; infrastructure; and protecting character) are indeed applicable to the whole borough.

However, the greatest challenges that the Council faces as part of the new Local Plan are the delivery of new homes, affordable housing and land for economic growth, and having regard to balancing Green Belt and greenfield land releases. With the worsening national housing crisis and the Government's growth agenda (the firm commitment to build 1.5m new homes over the next 5 years), housing delivery should be identified as the priority in the new Plan.

Question VI 3 Do you agree with the approach of establishing concise visions for the key places identified in the new Local Plan? Or do you have an alternative suggestion?

We fully support the Council's proposed approach to have succinct visions for larger settlements, including Northwich, setting out place-based priorities and principles for development in these areas. These clear strategies for what development will take place in each settlement should be strongly informed by an evaluation of all opportunities and potential sites for development within the relevant settlement area.

3 Objectives

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

- a. **Option A** – Take forward current Local Plan objectives
- b. **Option B** – Use the Sustainability Appraisal objectives
- c. **Neither of these**

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

In the Sustainability Appraisal (June 2025), Table 4.1. sets out the current Local Plan objectives and Table 4.2. sets out the Sustainability Appraisal objectives. The two sets of objectives largely overlap, but there are notable differences as outlined in Table 4.2 which assesses the compatibility of the SA objectives and the Local Plan objectives.

We support Option A, but with modifications. The SA objectives are generic and should not be solely relied upon as objectives in the new Plan, which needs to be specific to CW&C's growth needs and local constraints (e.g. rural development and education/skills). Instead, the current Local Plan objectives should be updated with elements of the SA objectives to address gaps such as climate change, biodiversity, pollution, and tackling inequalities. Modifying the current objectives in this way will ensure the new objectives are up to date and ambitious in terms of enabling sustainable development, whilst also remaining locally specific to CW&C's needs and ambitions.

5 Spatial strategy

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

There is no justification for not delivering a lower housing requirement than 1,914 dpa. This figure reflects government policy and supports the growth agenda ambition to deliver 1.5m new homes over the next 5 years (300,000 dpa).

The areas within CW&C's administrative boundary is very large, has sufficient land capacity at multiple key settlements and with no overriding environmental constraints affecting the district as a whole, only policy constraints. The Council must plan to meet this target, which is a 74% increase from the current Local Plan's target of 1,100 dpa. Consequently, the Council will need to review designed Green Belt land and key settlement gaps, and considering all development opportunities.

Stage One of the Land Availability Assessment (LAA) (2025) identifies Northwich to have the highest potential capacity for new homes out of the 4 largest urban areas, estimated at 2,731 units (although Winsford closely follows). In reference to Table 4.8. (Housing and mixed-use sites by spatial area and type – urban areas), identified opportunities in Northwich include 18 Greenfield sites (978 units), 36 PDL sites (1703 units), 4 mixed sites (GF and PDL) (50 units). It is clear that to meet the proposed housing delivery targets, the Council will need to consider all potential development sites, including those on the periphery of existing settlements such as our client's site in Davenham, and follow a full and rigorous site selection process.

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

The Housing Needs Assessment which is to be prepared will help to inform the strategic policies by identifying the actual number of dwellings required over the plan's period and in turn, will help determine the delivery targets for homes per annum. It will also provide insight as to whether a stepped housing requirement would be beneficial.

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

The Council proposes to follow the principle of directing new development and allocating land towards previously developed sites within settlements first. This is a rational approach as these locations often have access to existing services and facilities.

SS3 identifies that there are not enough planning permissions and opportunities for redevelopment within urban areas and towns. Consequently, the Council recognises the value of developing on the edge of settlements in locations with the best access to public transport and existing services and infrastructure. We are very supportive of this approach. Davenham is an accessible and sustainable location within the urban area, well supported by local infrastructure and services in Northwich town. Our client's Site at Green Lane is indicative of the potential for land to be suitably allocated on sites around the periphery of the village's current boundary.

Question SS 5 Do you agree with the suggested policy approach towards the settlement hierarchy, as set out in SS 4 'Settlement hierarchy' above? If not please suggest how it could be amended?

We agree with Northwich being placed third in the settlement hierarchy, following Chester and Ellesmere Port, which reflects the status as the third largest urban area within the LPA's administrative boundary. The provision of housing and employment development should be encouraged in this key settlement, which is in an accessible location and predominately on previously developed land.

It is positive to retain an individual placed-based policy for Northwich, which can incorporate and appropriately consider not only Northwich town, but the adjoining settlements that combine to form this urban centre.

Should the Council choose to follow a different approach to the spatial strategy, sustainable locations with large key service centre for growth will still need to be identified, and Davenham fulfils those criteria.

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

Yes, potential development opportunities should be considered for all settlements, regardless of their place in the settlement hierarchy.

The Council intends to ‘take a more place-based approach’ (see 5.7) in their spatial strategy, meaning the context and setting of development is highly significant in determining location. Development should be guided by the level and capacity of surrounding local services, facilities and infrastructure, and therefore all sites should be considered, even if located in smaller settlements.

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

- a. Option A - Retain the Green Belt
- b. Option B - Follow current Local Plan level and distribution of development; **OR**
- c. Option C - Sustainable transport corridors
- d. None of these

As concluded in the new Local Plan’s Sustainability Appraisal (June 2025), there isn’t a specific option that scores more positively than the others in terms of sustainable growth. All three of the options support sustainable growth, housing, healthy communities, and employment, with positive impacts on vitality of centre and services. Each option also relies heavily on greenfield land and includes significant development at Northwich.

To meet the significantly higher housing targets required for the new Local Plan, the Council must consider a whole range of options, big and small, and certainly shouldn’t rule out any smaller sites role in supporting growth at this stage. All potential sites for housing need should be evaluated as part of a comprehensive strategic approach to determine how any homes can be built in the identified key growth areas, including Northwich.

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

No, Option A is not appropriate because it places development in areas with poor transport and services to avoid the Green Belt and requires unclear infrastructure investment. Since there is not enough land for development within current settlements, and it is clear that the Council cannot meet the higher housing target of 1914 dpa (28,710 homes over the proposed 15-year Plan) without releasing more Green Belt land and countryside for development. A strategy focused on urban edges with better access to transport and infrastructure, such as Option B and C, is more suitable.

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

Option B is appropriate as it directs development to the main urban areas and settlement edges with the best access to transport, services, and infrastructure. It aligns with the strategy and settlement hierarchy set out in the current Local Plan (Policy STRAT 2 in Part One). Given the limited supply of previously developed land to accommodate the needed new development, some Green Belt and countryside sites, such as our client's Site at Green Lane, will also be needed.

The Council must consider all sites for housing need as part of a comprehensive strategic approach to determine how many homes can be built in the identified key growth areas, including Northwich.

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

Option C prioritises growth around sustainable transport corridors, focusing new homes in and around settlements on the railway network and on main bus route corridors. The Council estimate that this approach could deliver over 12,000 new homes, but it will have to plan carefully around risks to Green Belt impact, urban sprawl and settlement merging. While it offers sustainable locations, Option B is more appropriate in terms of supporting existing urban areas and protecting local distinctiveness.

As mentioned above, the Council must consider all sites for potential development to meet the boroughs high housing needs.

Question SS 20 Do you think that the potential 'showstopper' constraints identified above, are correct or are there any others that we should consider?

The Council acknowledges there will not be enough land within settlements, and therefore it is necessary to also identify new areas for development that are in Green Belt and/or countryside. However, the Council have excluded areas of land that are subject to constraints that would act as potential 'showstoppers' to restrict future development, including key settlement gaps (KSG) (para 5.12).

We are against the exclusion of all potential development in KSGs as this is an unnecessary restriction to place on assessments identifying future site allocations. It is incorrect to unanimously decide that KSG designations are a 'showstopper' for all opportunities since the proposed Landscape policy (LA1) allows for flexibility. It states that proposals should be supported where they do not harm the settlement separation or identity functions of the gap. This flexibility should be recognised in the Councils approach to identifying potential growth areas and locations for new development. Further comments on this matter are detailed in our response to Questions LA1 and LA2 below.

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

The Council needs to ensure it follows a full, rigorous site selection process, which is evidenced. Site allocations should be evaluated against the findings of the Housing and Economic Land Availability Assessment (HELAA). This will include the usual assessment of suitability, land availability, and achievability, considering market conditions and other factors. The sites should also be considered against the overarching principles in the Council's chosen spatial strategy, and the settlement specific visions and place-based policies.

The Council's high housing targets and Green Belt constraints necessitate the need to consider all alternative options for meeting the identified need for homes across the area of the Plan. It is important to equally evaluate smaller sites

This includes making as much use as possible of suitable underutilised land, such as our Client's site at Green Lane. Site does not make an important contribution to the open character of the village.

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

Map 5.6 illustrates Northwich growth options (p.45()). Only two residential sites are located in Davenham – NOR07 and NOR06 – and are included in all three of the Council's proposed spatial strategy options (A, B, and C). Appendix B provides additional information on these identified two areas. Davenham East (NOR6) is estimated for 862 homes, and Davenham West (NOR07) for 443 homes. Neither of these two options for Davenham can be considered as 'most suitable' since these are large land areas that have a limited relationship to the existing settlement or local facilities.

The consultation document claims to have identified around 100 potential growth areas to meet housing and employment needs, mainly focuses on edges of towns, larger villages and near rail stations. The sites are said to have been selected based on existing permissions, past submissions and a review of undeveloped allocations. However, this is misleading as the identified potential growth areas do not accurately reflect all suitable opportunities in Northwich.

The LAA Stage One update report indicates at least 33 other sites that have been considered 'suitable' for potential residential development within the parish of Davenham alone, 22 of which are adjacent settlements to the existing Northwich urban area (within 100m). None of these sites are reflected in the 'growth options' for Northwich, and this is deceptive. The Council needs to ensure growth and site allocations are not limited to these very broad and disproportionately large allocations. A full, rigorous site selection process must be undertaken to equally evaluate all opportunities for housing delivery in Northwich.

Question SS 30 Do you have any further comments about any of the potential growth areas identified around Northwich?

We support the Council's identification of Northwich as a strategic focus for new development. However, as mentioned in response to SS29 above, the broad blobs on Map 5.6 illustrating 'Northwich growth options' are misleading and not representative of the opportunities for housing delivery in Northwich. Stage One of the LAA clearly identifies a range of sites, so the those illustrated on the map are not the only options. The Council will need to rely on these smaller sites to deliver the high housing need.

Throughout the whole borough, smaller sites will be a critical source of new housing as large sites are constrained by the Green Belt at several key settlements. These smaller sites are important for housing delivery because they diversify supply and can help create more socially integrated communities. For example, our client's Site is underutilised land adjacent to an existing residential settlement and with good links into existing infrastructure and services. It is a sustainable location for new housing and the development will have minimal impact on the open character of Davenham. Contributions from these types of sites are key to meeting the high housing targets and must be factored into growth plans for Northwich.

8 Northwich

Question NO 1 Do you agree with the suggested policy approach towards Northwich, as set out in NO 1 'Northwich' above? If not please suggest how it could be amended?

The suggested approach is for Northwich to be a strategic focus for new development and for regeneration, seeking to maximise housing and other development on previously developed land. Proposed Policy NO 1 maintains the Northwich urban area boundary to comprise of the town of Northwich and the adjoining settlements, which includes the village of Davenham. We firmly support the retention of these settlements in the defined area.

As mentioned in response to question SS5 above, we strongly support the Council in their place-based approach and the proposal to retain an overarching and locally distinct policy for Northwich. This will help ensure that planned growth appropriately considers the capacity of existing infrastructure and the impacts of growth on the existing settlement, particularly in regard to landscape and townscape.

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

We strongly encourage the Council to consider all sites within and on the periphery of the adjoining settlements that comprise the Northwich urban area, such as our client's site at Green Lane.

The Place background paper for Northwich (amended 2024) identified that our client's site falls within the 'Davenham Village and Leftwich Grange (Kingsmead) KSG'. This area is a relatively small, narrow linear green space south of the A556, and is currently experiencing development on the eastern part, which is eroding the separation functions this area once had. As mentioned in

response to question SS20, KSG designation should not unanimously be perceived as a 'showstopper' and unnecessary restrictions should not be placed on assessments identifying future site allocations.

Question NO 5 Should the settlements that make up the wider Northwich urban area be retained?

Yes. The proposed Policy NO 1 maintains that the Northwich urban area boundary comprises of the town of Northwich and the adjoining settlements, which includes the village of Davenham. These settlements have been included in Northwich's defined area for a long time, and we strongly support their retention.

Opportunities have been identified within Davenham for appropriate levels of development that will support housing delivery and local needs and contribute to the Council's growth strategy for Northwich more widely. It is essential that the potential of the adjoining settlements is therefore recognised in Northwich's place-based policy, and we encourage the Council to consider all potential areas for development within the urban area and adjacent to the established settlements.

19 Housing

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

Government's housing delivery target for CW&C is a minimum 1,914 dpa, equating to 28,710 new homes over the proposed 15-year period of the new Local Plan. The details of this policy will heavily depend on the outcomes of the Housing Need Assessment, which is yet to be prepared, but will provide the basis for delivering the mix of homes required and the requirement for affordable housing.

Question HO 2 Should the housing mix and type and specialist housing be delivered through a percentage policy approach that sets requirements for each category of housing?

It is logical for targets to be specific to the needs of particular areas and to take into account the location of development. Housing mix and specialist housing targets should be guided by local needs and site-specific factors, not rigid percentages. The policy must remain flexible to allow for full consideration of site opportunities, viability, and affordability while ensuring developments stay deliverable. The Council should allow for targets to adapt to up-to-date housing evidence and future needs, so the mix of homes remains realistic and sustainable.

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?

We support the suggest approach toward delivering affordable housing but again highlight the importance of the policy allowing for flexibility so that viability issues can be appropriate considered and managed.

24 Landscape

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

We are against the Council's suggested approach of retaining and combine the existing Local Plan (Part One) policy ENV2 and Local Plan (Part Two) policy GBC3. The current policy approach is too constrained and risks limiting growth opportunities, and landscape existing designations should not simply be carried forward without reassessment against growth and housing needs.

CW&C is entering a new growth phase and is faced with significantly higher housing targets with an estimated minimum of 1,914 dpa, compared current Local Plan's minimum of 1,100 dpa. Considering this 75% increase, it is not appropriate for the Council to simply roll forward this a policy constrained approach which could restrict growth opportunities and disregard potential suitable development sites prior to a more detailed assessment.

The new Local Plan should continue to protect and enhance landscape character and local distinctiveness. However, it is important to balance this with development needs, particularly in the context of the Government's increased housing target. As such, the existing KSG designations should not be carried forward without being clearly justified against a detailed consideration of growth and housing needs.

We recommend that the Council undertakes a comprehensive Landscape review to assess the quality and value of landscape should be included in the new Local Plan's evidence base. A detailed assessment is needed to justify any policy restrictions and to ensure new designations are backed by evidence and proper evaluation of the quality and value of the landscape.

Flexibility in policy LA 1 is supported, allowing development in KSGs where it avoids coalescence, protects distinctiveness, and respects settlement character. Development should not be blocked in otherwise sustainable locations at settlement edges, such as our clients Site at Green Lane.

Question LA 2 Should the key settlement gaps currently defined in Local Plan (Part Two) policy GBC 3 be reviewed? Could they be expanded, and/or should new key settlement gaps be identified in the Green Belt, or other areas to help protect the character of settlements?

Yes, the key settlement gaps (KSGs) should be reviewed.

The Place background paper for Northwich (amended 2024) considers the KSG known as ‘Davenham Village and Leftwich Grange (Kingsmead) KSG’, which is a relatively small, narrow linear green space south of major road infrastructure (A556). While the area does afford a perceptual break, the Council notes the strong influence of the road, as well as the increasing erosion of this gap due to recent consents and ongoing development. The function of this KSG is therefore questionable and the Council itself acknowledges its weakening role in maintaining separation and local character.

Development at this Site would not undermine the local character or distinctiveness. Though maintaining a perception of separation between settlements is important, it should not prevent appropriate development in locations that can deliver much needed housing. Flexibility should be built into the new Local Plan, and the policy should allow for exceptions for appropriate development.


The current evidence base for KSG designations is outdated, with information dating back to the Vale Royal Local Plan (2006), with updated Landscape Studies having been in 2016. A new Landscape Strategy should be undertaken to ensure that KSGs continue to serve their purpose of protecting settlement identity and distinctiveness. Particular attention should be given to the three KSGs in Davenham, where enabling sustainable urbane extensions is essential to meeting the borough’s new housing targets and growth plans for Northwich.

Summary

Thank you for the opportunity to provide comments on the suggested approach to the new CW&C Local Plan.

Overall, the Client is supportive of a spatial strategy that enables development in the Northwich urban area, and Davenham itself as a sustainable centre. We strongly encourage the Council consider all potential growth and development opportunities for Northwich, including sites on the periphery of Davenham.

Yours faithfully,



Partner

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