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Cheshire West and Chester Council
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28th August 2025

Dear Sir/Madam,

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, Sandra Stonham ('the Client'), to the Cheshire West and Chester Local Plan Issues and Options (Regulation 18) consultation.

Background

The Client owns a 6.67ha parcel of land west of Mereheath Close, Davenham ('the Site'), which falls within the spatial planning area of Northwich.

The Client's overarching vision for the Site is that future development will create a high-quality, residential extension to Davenham, sensitively integrating a diverse array of homes into the surrounding landscape and townscape. The Site provides the opportunity to deliver approximately 75 – 90 residential dwellings, a new multi-use community centre/village hall for the village of Davenham, village car parking, public and play spaces, tree planting and ecological enhancements. Land Availability Assessment (LAA) Stage One (2025) has deemed the site 'suitable' for residential development (site ref: 1827).

The proposed development is supported by Davenham & Bostock Parish Council who have included it into their Village Strategic Development Plan, which they intend to submit as part of their response to this Local Plan consultation.

The Client has previously undertaken pre-application discussions with the Council in December 2024, which the Parish Council also attended (see Appendix A for pre-app presentation slides).

Parish Council

The Client has a positive working relationship with Davenham & Bostock Parish Council (the 'Parish Council' (PC)) and have been in working collaboratively with the PC since May 2022 on this opportunity for growth in Davenham. Community engagement and discussions with the PC has helped inform the Client's proposals for the Site, particularly the ambition to facilitate a community led project to deliver a community centre and improved local facilities, alongside the proposed housing to meet local need. Subsequently, the PC have identified the Site as the key area for village growth and consider it to be the best possible locations for residential and community development in the village. The Site is especially unique given its close location to Davenham CoE Primary School and existing sports facilities at Butchers Stile Playing Field. The PC have consulted the local community on the site during their four most recent town halls in August 2025. As such, we encourage that this representation is read in conjunction with the PC consultation submission.

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. We encourage the Council consider all potential growth and development opportunities for Northwich, including sites on the periphery of Davenham, noting that to the north of Northwich, land is constrained by the Green Belt and exceptional circumstances would need to be demonstrated for any land release in that part of the borough including an assessment of alternative options. Land at Davenham is therefore a higher priority than any Green Belt releases.

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 are not listed here and suggest the value of these additional assessments are considered by the Council.

In reference to questions and commentary in Section 24 Landscape, we suggest a Landscape Study or Strategy, which should include the review of Key Settlement Gaps, is included in the evidence base for the new Local Plan. The current Landscape Strategy (Part 1 and Part 2) includes designations dating back to the Vale Royal Local Plan (2006) evidence base, as does the Local Landscape Designation Review, which identifies KSGs outside of the Green Belt in CW&C. Updating information on Local Landscape Designations will help inform the Council's approach policies around potential growth in specific areas such as Northwich, as well objectives for local green spaces, landscapes and designated sites.

Question IN 2 Do you have any comments on what the monitoring framework should include?

We agree with the list of potential monitoring indicators is set out in Appendix 4 (SA framework, objectives, sub-objectives and indicators) in the Sustainability Appraisal 2025.

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. However, the consultation document does not actually state what the plan period will be. The latest Local Development Scheme suggests that the new Local Plan will not be adopted until at least the end of 2027. 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 placed-based approach to visions for each key settlement.

The fourth overarching principle, 'protecting character', extends to ensuring that the scale of development is proportionate to the size of the existing settlement and local community. The two proposed potential growth areas / large scale housing developments located in Davenham, Northwich (as indicated by Map 5.6 on p.45), threaten the special character of the village and therefore are not aligned with this principle.

More detail could be provided on to how the Council seeks to achieve sustainable development, so that to the vision better reflects proposed Policy SD1 and to clarify that this is at the heart of the new Plan.

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?

We support the four overarching principles: tackling climate change; promoting wellbeing; providing infrastructure; and protecting character; these are common themes / priorities which are applicable to the whole borough. However, the greatest challenges the Council faces as part of the new Local Plan is the delivery of new homes, affordable housing and land for economic growth, having regard to balancing Green Belt and greenfield land releases. With the national housing crisis growing and the Government's firm commitment to build 1.5m new homes over the next 5 years, housing delivery should be prioritised as the priority in the Local 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. This will provide a clear strategy for what development will take place in each settlement and should be strongly informed by local needs and with input from the local communities to ensure key issues and opportunities are fully recognised. Proposals that have strong community support, such as the proposed development at our client's Site, should be recognised and incorporated into the relevant settlement visions, in this case the vision for Northwich.

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**

In the Sustainability Appraisal (June 2025), Table 4.1. sets out Local Plan objectives taken from the current Local Plan (Part Two) 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 recommend that **Option A** is a more appropriate approach, but the current objectives should be modified to include elements of the SA objectives to address current gaps. This would have the benefit of modernising the existing objectives to ensure sustainable development is better supported, such as new considerations given to climate change mitigation and adaptation, biodiversity, or managing pollution. This is particularly important since CW&C has a relatively high per capita carbon dioxide emissions and the fact that unanimously declared that the borough was in a climate emergency in May 2019. Existing objectives can also be strengthened to better support sustainable development, such as SO8

which promotes walking and cycling, but can be amended to more strongly support reductions in the need to travel and increases in sustainable modes of transport.

We recommend Option A with modifications, instead of Option B with modifications, because the current Local Plan objectives are specific to the ambitions and challenges of the local area. For example, rural development and diversification given that CW&C has significant areas of agricultural land. The SA objective shouldn't be used alone because they lack key social objectives which are covered in the current Local Plan objectives, such as those around education and skills. Having said this, these should be modified to better tackle inequalities. Ultimately, the objectives for the new Plan need to be specific to the needs of the community that the council serves, and the future growth agenda for CW&C.

Question OB 2 Do you have any alternative approaches options that you would like to suggest?

As mentioned in response to question OB1 above, recommend the Council combines the current Local Plan objectives with the SA Objectives, to ensure the new objectives are up to date and ambitious in terms of enabling sustainable development, while also remaining locally specific.

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?

Yes, but these objectives should be reviewed and updated (see response to OB1 and OB2 above).

Question OB 4 Do you think that objectives SO1, SO3, SO9, SO10 need to be amended if they are to be taken forward into the new Local Plan? Do you have any suggestions for how they should be amended?

We are supportive of SO1s objective to promote regeneration and development in Northwich, to support sustainable communities.

SO9 (sustainable development and urban regeneration) supports locating most development within and on the edge of main urban areas / key service centres. The objective should be amended to clarify that this includes development on the periphery of the established settlements that comprise urban areas, such as Davenham which forms part of the Northwich urban area. It would also be beneficial to emphasise suitable sustainable attributes, such as connectivity and sustainable modes of transport, linking to other relevant objectives (e.g. SO8).

SO10 (environmental quality and character) includes Green Belt and countryside development. We recommend that this objective is amended, or perhaps split, to have one objective focusing on character – landscape and townscape – in support of local distinctiveness. Whereas ambitions for improved environmental quality may sit better in an environmental specific objective.

Question OB 5 Do you feel that the option of using the Sustainability Appraisal objectives in the new Local Plan, as set out in Option B 'Use the Sustainability Appraisal objectives' above, is an appropriate approach?

These are important objectives to be considered and incorporated into the Local Plan, to ensure the Council's spatial strategy and local policies are ambitious in enabling sustainable growth, and that the impacts of climate emergency are also appropriately considered. But the SA objectives are generic and should not be solely relied upon as objectives for the new Local Plan, which requires objectives that are specific to CW&C's growth needs and local constraints.

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?

No, there is no justification for not delivering a lower housing requirement than 1,914 dpa.

The government updated the NPPF in December 2024, introducing a revised 'standard method' for calculating minimum housing need for each local planning authority in England. The rationale behind this update is to support the government's growth agenda and ambition to deliver the targeted 300,000 dwellings per annum (dpa). Using this new method, the housing target CW&C is a minimum of 1,914 dpa. Over a proposed 15-year period for the new Local Plan, this equates to a total figure of 28,710 new homes. This is a significant increase from the current Local Plan's minimum of 1,100 dpa, equating to 22,000 new homes over the plan's 20-year period.

Whilst the government has implied that under certain circumstances, LPAs may be able to justify a lower housing requirement than the standard method figure due to local constraints on land and delivery, we understand there to be no clear reason why this would be the case for CW&C. The area that falls within the Council's administrative boundary is very large, with multiple key settlements and no environmental constraints affecting the district as a whole, only policy constraints.

To deliver the new minimum 1914 dpa, the Council will need to consider how to manage constraints to growth and housing delivery, as well as infrastructure provisions. For example, reviewing designated Green Belt land and Key Settlement Gaps.

The findings of the Stage One Land Availability Assessment (LAA) (2025) estimate a total capacity of 2,731 units in Northwich, which is the highest figure out of the 4 largest urban areas in the Plan's spatial strategy (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. Preferential consideration should be given to sites that are strongly

aligned with the Local Plan's objectives, such as our client's Site at Davenham which is highly sustainable and supported by the local community.

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. Furthermore, the Infrastructure Delivery Plan will be essential for planning the delivery of housing in line with the provision of supporting infrastructure.

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. Additionally, SS3's reference to design is positive in terms of mitigating impacts on landscape, townscape and cultural heritage.

SS3 identifies that there are not enough planning permissions and opportunities for redevelopment within urban areas and towns. The approach to develop on the edge of settlements is recognised and recommended in locations with the best access to public transport and existing services and infrastructure. We are very supportive of this. Davenham is accessible and sustainable location within the Northwich urban area, with the potential for land to be suitably allocated on sites around the periphery of the village's current boundary. Davenham is well supported by the local infrastructure and services in Northwich Town.

Proposed policy SS3 doesn't differentiate between housing and employment development, and clarity should be given to 'directing new development and allocated land', so that is its specified, not assumed.

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. The exact location of development will need to be mindful of potential impacts on the existing settlements, particularly landscape/townscape, and Policy NO1 will help manage the local constraints. Planned development needs to be considerate of existing communities within these settlements, by being proportionate in scale to protect the local character, and by prioritising proposals with strong community support.

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 hierarchy provides a clear strategy for allocating development according to the status of the settlement, and having an established vision for what development will take place is more important for larger settlements. However, the Council states their intention to ‘take a more place-based approach’ (see 5.7) in their spatial strategy, and as such the context and setting of development is also significant in determining location.

Ultimately, 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. The scale of development will need to be proportionate so to not exceed capacity and to ensure the needs of the local community are met, while also protecting the local character and distinctiveness of the settlement. Additionally, full consideration should be given to sites that uniquely satisfy community needs and have community support, regardless of ranking in the settlement hierarchy. Though our client’s Site in Davenham is within a key settlement of Northwich, it is a good example of a fantastic opportunity for development in a highly sustainable location on the periphery of a smaller settlement, and its potential should be fully recognised in the new Local Plan.

Question SS 8 Do you agree that in smaller settlements, the character should be protected, and development should not exceed the capacity of existing services and infrastructure?

Yes, strongly agree. As mentioned in our response to Q SS 6 above, the scale of development should be relative to the existing settlement size and capacity of local infrastructure and facilities. It is particularly important to protect the local distinctiveness in small settlements, therefore very large-scale developments, such as those proposed in Davenham, should be avoided where they threaten the heart of the settlement.

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

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 options would have positive effects on housing provision, healthy communities, and the local economy and employment by providing a mix of employment sites. All three options also scored positively for vitality and viability of centres, safeguarding existing shops and services by focusing on providing additional development in or close to centres. All three options also have a greater percentage of development on greenfield land and include 5000 plus homes and a greenfield employment expansion at Northwich.

Nonetheless, our responses to the other spatial strategy related questions below provide more details as to why we perceive **Option B** to be the most appropriate of the three options presented in the consultation document.

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

The approach taken for Option A assumes that all new development areas will be outside of the Green Belt and proposes more development in Northwich and Winsford, and development of smaller settlements. As noted in the Sustainability Appraisal (June 2025), additional travel is required for Option A since these areas have lower levels of sustainable transport provision and reduced services. However, it is not yet clear what additional infrastructure would be required as part of the proposed development.

Using the government's revised 'standard method', CW&C faces a significantly increased housing target of 28,710 new homes over the proposed new Plan's 15-year time period, compared to the target of 22,000 new homes over the adopted plan's 20-year period. Equating to a new minimum 1914 dpa, the Council needs to meet the borough's housing needs in a way that effectively tackles constraints to growth and infrastructure provisions. The Council recognises in the consultation document that the new Local Plan has a much more limited supply of previously development land to accommodate this new development, and larger areas of Green Belt and/or countryside are likely to be needed. Therefore, Option A does not appear to be most appropriate strategy.

Additionally, Policy SS3 identifies that there are potentially not enough opportunities for redevelopment within urban areas and towns. The suggested is to develop on the edge of settlements, particularly in locations with the best access to public transport and existing services and infrastructure. This approach is better aligned with the spatial strategy outlines in Option B.

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

Option B follows the strategy and settlement hierarchy set out in the current Local Plan (Policy STRAT 2 in Part One), locating most new development in, or on the edge of, the main urban areas. This option most aligned with Policy SS3 as it recognises that the shortfall in opportunities for development in urban areas and towns. As such, Option B allows for an appropriate level of new development to be focused on the edge of settlements, as well as smaller settlements, that have the best access to public transport and adequate services, facilities, and infrastructure. We are supportive of Option B as this approach since it is based on the more sustainable settlements and is aligned with the settlement hierarchy outlined in Policy SS4.

The consultation document acknowledges that unlike the adopted Local Plan, the new Local Plan faces a more limited supply of previously developed land to accommodate the needed new development, and as such larger areas of Green Belt and/or countryside are likely to be needed. Greenfield sites on the periphery of Davenham, e.g. as land west of Mereheath Close, are a good example of potential locations that not only have good sustainable connectivity into the immediate local centre, but also Northwich town and could be accommodated within the existing Northwich urban area.

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

Option C is based on settlements with the best sustainable transport opportunities, focusing new homes in and around settlements on the railway network and on main bus route corridors. The approach supports a more distributed pattern of development, with more modest urban extensions around Chester, Ellesmere Port, Northwich and Winsford. Potential Green Belt release is considered to deliver more than 12,000 homes.

As noted in the Sustainability Appraisal, Option C ‘could have a greater impact on the Green Belt if multiple developments took place along corridors potentially adding to the impression of urban sprawl and the merging of settlements.’

In our response to questions LA1 and LA2 below, we encourage updates to the current Landscape Policy to allow for greater flexibility to facilitate new housing in sustainable locations, namely reviewing the functionality of key settlement gaps. However, it is important to carefully consider the capacity of existing infrastructure and the impacts of planned growth on the existing settlements. Large scale developments at smaller settlements along key transportation routes risk negatively impacting existing centres and local distinctiveness of the area. Therefore, we perceive Option B to be more appropriate than Option C, because it is better aligned with visions for the key urban areas and maintaining local distinctiveness.

Question SS 19 If you do not feel that Option C is an appropriate spatial strategy option, are there any changes that you could suggest?

The proposed urban extensions around Chester, Ellesmere Port, Northwich and Winsford are more modest in Option C. However, the Council notes that this approach could potentially

adding to the impression of urban sprawl and the merging of settlements. If this growth strategy is taken forward, the Council should undertake an updated Landscape Study, including the identification of key settlement gaps and their functionality, to inform decisions on the best locations for growth, that also protect local distinctiveness and existing communities.

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

Paragraph 5.8. of the consultation document notes that it may be necessary to identify new areas for development if not enough land can be identified within settlements, the locations for which may be in Green Belt and/or countryside. 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 do not agree that potential growth areas and or future site allocations should be limited by excluding all potential development in KSGs. In reference Section 24 on Landscape and proposed Policy LA1, KSGs are a mechanism to protect landscape character and local distinctiveness, but proposals should be supported where they do not harm the settlement separation or identity functions of the gap. The flexibility intended by this policy should be recognised in Council’s 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.

Additional weight should be given to site allocations that best serve local community needs, particularly those that have local neighbourhood and Parish Council support, such as our client’s site in Davenham. In reference to the PC’s consultation response, the Site has been identified as the key area for growth and the community consider it to be the best possible locations for residential development in the Davenham. In the PC’s strategic development plan for the village, which will be incorporated into the next revision of the neighbourhood plan, proposed development at the Site is recognised as having minimal impact on congestion in the village centre and fundamentally, will support the provision of community infrastructure, whilst retaining village character. The Site’s location is highly supportive of sustainable modes of travel given its proximity to the village centre, existing sports facilities and local school. The site also presents the opportunity to provide a range of housing types, including a mix and

style that respect the local vernacular. These are key planning matters that weigh strongly in the site's favour and should be taken into account when assessing and determining the site's allocation.

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

Map 5.6 on page 45 illustrates Northwich growth options. Only two sites are located in Davenham – NOR07 and NOR06 – both major residential sites, which are included in all three of the Council's proposed spatial strategy options (A, B, and C). Additional information for identified growth areas is within Table B.3. in Appendix B, and the two sites are Davenham East (NOR06) with an estimated 862 homes, and Davenham West (NOR07) for 443 homes. We do not think either of these two options for Davenham are suitable since these are large land areas that have a limited relationship to the existing settlement or local facilities, and the proposed development is of a disproportionate scale in the context of the village

The LAA Stage One update report indicates at least 33 sites that have been considered 'suitable' for potential residential development within the parish of Davenham alone, 21 of which are adjacent settlements to the existing Northwich urban area (within 100m). None of these sites are included in the consultation document as potential growth areas, and this is misleading. The Council needs to ensure it follows a full, rigorous site selection process, and that growth areas are not limited to these very broad and disproportionately large allocations.

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. Our client has been discussing the opportunity for development at their site and sustainable growth in Davenham with the Parish Council for some time. This engagement has informed their vision for the site and consequently our client is proposing a high-quality, residential extension to Davenham that sensitively integrates with the existing residential area and landscape/townscape and incorporates local community ambitions to deliver a multi-use community centre which is much needed by the community and local primary school. This is a scheme that will give back to the community and is fully endorsed by the Parish Council, who will be the beneficiary of the new community facility, and who have consulted the community at Town Hall events in August 2025. It is just one example of potential missed opportunities the Council faces by taking such a broad approach to planning growth in the key settlements. Sites such as our clients should be considered to inform plans for potential growth in the Northwich urban area.

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

The Davenham and Whatcroft Neighbourhood Plan (2017) acknowledges that there are facilities that the local community require, such as a modern community centre to provide sufficient social support for all generations. This is a key aspiration for the Parish Council. Our

site has the potential to support the provision of such a facility, alongside the provision of a range of housing types, including a mix and style that respect the local vernacular. It is a highly sustainable location, with residents having the ability to walk to the village centre, school, and sports facilities, which reduces impacts on and helps mitigate local congestion issues. These factors are key to supporting housing delivery in a way that maintains the look and feel of the village and should be positively weighed up in the determination of growth plans for the village, and in the context of the wider Northwich urban area.

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 policy approach is for Northwich to be a strategic focus for new development and for regeneration, seeking to maximising 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 placed-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?

Our comments on potential growth areas in Northwich are covered in our answers to questions SS29, SS30 and SS31 above.

Additionally, the consultation document suggests the following four key allocations for Northwich: Wincham urban village, Northwich town centre, Winnington works (TATA), and Gadbrook Park. We encourage the Council to consider peripheral sites in the adjoining settlements that comprise the Northwich urban area, such as our client's site ('Land west of Mereheath Close in Davenham', ref: 1827 in the LLA Stage One Update 2025).

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. Development should be guided by the level and capacity of the local services and infrastructure, and the scale must be proportionate the existing settlements that comprise Northwich to ensure local distinctiveness is maintained.

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. However, the Council have made clear their intention to have a more comprehensive approach to residential mix for both market and affordable housing in the new Local Plan, set out in the detailed requirements of policy HO 1. We support this approach.

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. For example, we support the locational requirements for specialist accommodation to ensure these developments are in accessible areas with good accessibility to a range of functions, within or adjacent to existing settlements.

The approach set out in the policy needs to be flexible. Suitable housing mix should be decided on a site-specific basis, taking into account the opportunities and constraints of the site and viability considerations. It is important to that the policy is flexible so to balance affordability and viability, to ensure that the prospect of development remains financially viable for developers and landowners have enough incentives for development. Therefore, the Council should allow for flexibility within the policy for how these housing delivery targets are met, and to allow for the most up to date housing information and future needs to be taken into account when deciding tenure split and housing mix for individual sites.

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?

Given the Government's local housing need requirement is significantly higher than the current planned requirement the amount of affordable housing across the borough will significantly

increase. 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.

Question HO 6 Do you agree with the suggested policy approach for residential development proposals, as set out in HO 3 'Proposals for residential development' above? If not please suggest how it could be amended?

The Council suggests retaining the criteria currently set out in policy DM19 relating to development in the countryside, outside of identified settlements.

The village of Davenham is situated within the Northwich urban area settlement, however our client's site is situated on designated open countryside, albeit adjacent to existing residential area on the periphery of Davenham.

Criteria 5 of Policy DM19 requires new housing to be supported in a neighbourhood plan for the area. Our client has been engaging with the Parish Council and discussing opportunities for growth in Davenham for some time. Our client's site is one of the three areas that the PC has identified as being the best possible locations for necessary development, which is compatible with the character of the village, and is therefore fundamental in meeting identified housing needs. While not within the adopted neighbourhood plan, our site is an example of a proposed development which meets the intension of criteria 5 in that it would address local housing needs in a way that is specific to the area and local community needs. We encourage the Council to consider flexibility with the policies relating to residential proposals, to ensure that appropriate development is permitted sustainable locations.

Question HO 16 Should the policy approach towards rural exception sites continue to apply to all identified smaller settlements or just those in more remote areas of the borough?

The Council seeks views on whether rural exceptions should only apply to those settlements that are more remote from large urban areas given the wide opportunities to access housing in these urban areas. We agree that rural exception sites should continue to only be permitted where the local need cannot otherwise be met on sites within an identified settlement boundary (Policy DM24). However, we recommend the updated policy clarifies that this also includes where the local need cannot be met on peripheral sites adjacent to the existing settlement boundary.

Question HO 17 Should market housing still be allowed through the policy on rural exception schemes?

Local Plan (Part 1) Policy SOC 2 allows for a small, subsidiary element of market housing to be permitted on rural exception sites where it is essential to enable the delivery of affordable housing to meet local needs. Policy DM 24 of the Local Plan (Part 2) requires the current affordable local needs for to be demonstrated through an up-to-date independent assessment

prepared by or in collaboration with the Parish Council, to ensure that there is a genuine local need. We support the retention of this policy position.

22 Open space, sport, recreation and community facilities

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

The Issues and Options consultation document correctly identifies the key issues of ensuring good quality sports and leisure facilities that are accessible to local residents, and the importance of developer contributions to the health and wellbeing of residents (para 22.3).

The client welcomes the enhancement of existing spaces and facilities and agrees that support should be given to proposals that improve the quality and quantity of accessible open space, sport and recreation. The Council is also encouraged to outline the circumstances where development involving the loss of existing space and facilities will be supported, such as when a better replacement or compensatory facility is provided. Additionally, on site open space contributions should also be viewed more favourably than off-site or financial contributions. Proposals which link and enhance existing sports and leisure facilities, and which assist key community institutions such as local schools, should be favoured. For example, proposed development at our client's Site looks to enhance the Butchers Stile Playing Field and provide a facility that can be used by the local Primary School addressing an identified local need.

Question OS 4 Should the policy approach be more flexible in the order provision of open space in new developments? If yes, do you have any suggestions how this could be achieved?

Our client supports the protection and management existing open spaces and sport/recreation/community facilities and the enhancement of these multi-functional open spaces and facilities. We agree that greater flexibility should be afforded in policy requirements for these provisions in new developments, to help ensure the new and/or improved facilities are delivered in line with community needs and tailored to addressing identified shortcomings in current local services.

Question OS 5 Do you agree with the suggested policy approach towards cultural and community facilities, as set out in OS 2 'Cultural and community facilities' above? If not please suggest how it could be amended?

Yes, agree. Development offering community and cultural facilities, including sports and recreation, should be supported and the improved access for the local community and schools should be weighed favourably. Our client's site is a great example of proposed development which provides the opportunity for improved sports and leisure facilities, which would crucially address the identified need in the local community.

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.

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 seek the protection and enhancement of landscape character and local distinctiveness. KSGs can be an effective mechanism for doing this by protecting local distinctiveness and preserving the character of the landscape. 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 designations should not be carried forward without being clearly justified against a detailed consideration of growth and housing needs.

Therefore, we recommend that the Council undertakes a comprehensive Landscape review, focusing on the quality of landscape, which should be included in the new Local Plan's evidence base. Landscape character areas are commonplace across the country, and do not necessary mean that the land is high quality nor that the landscape constraints make the potential development sites inappropriate or unacceptable. A detailed assessment will therefore help to ensure that any designations are justified and desirable in terms of their intended purposes of national policy and regulations. Some additional landscape designations may be required, such as the Areas of Special County Value mention at paragraph 24.5, but these should be based on the evaluated quality and value of the landscape.

In the context of changes to the national Green Belt policy, at 24.3 the Council states, 'we think there may be an enhanced role of key settlement gaps in the new Local Plan' and suggests then identification of additional / new KSG may be considered. This further adds to our argument that the Council needs to undertake a full review of the current KSGs. This assessment and the resulting policy should be clear on the functions served by identified key gaps being taken forward in the new Local Plan.

We support the suggested flexibility in policy LA 1 to allow for development in KSGs to be supported 'where it would not lead to coalescence, increase the intervisibility between settlement edges, harm the undeveloped character or materially alter historic form of the settlements;'. Proposals should need to take account of the characteristics of the development site and its relationship with its surrounding landscape, but these matters should not prevent development in locations on the periphery of established settlements, that are otherwise high sustainable locations. Factors such as local community support for the proposed development, and mitigation measures to avoid coalescence (such as planting woodlands and the delivery of green infrastructure), should also have merit.

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?

Key settlement gaps (KSG) in the adopted Local Plan are based on a Landscape Character Assessment from 2009 and the Local Landscape Designation Review (Part 2) from 2016, which identifies KSGs outside of the green belt in CW&C. CW&C now faces very different development pressures which fundamentally alters the context for growth and undermines this policy constrained approach, calling the robustness of the previous landscape analysis into question.

We recommend an up-to-date Landscape Study or Strategy, which should include the review of KSGs, is included in the evidence base for the new Local Plan, to ensure that the KSGs still correctly serve their intended purpose of protecting local distinctiveness and character between settlements. Particular attention should be given to the three KSGs located in Davenham, in the context of enabling sustainable development within the Northwich urban area (as proposed by all three of the spatial strategy options) and in consideration of the Council's significantly increased housing delivery targets.

The Place background paper for Northwich (amended 2024) considers the KSG known as 'Davenham and Moulton KGS', within which our client's site is located. The Council note that this area of relatively flat and low-lying Cheshire Plain pasture falls between extensive residential areas allowing for an extent of separation. However, recent development consents will result in the open break between settlements being further eroded. The established function of this area, as currently defined, can be questioned as the Council states 'a perception of clear separation is however becoming eroded, and whilst partial development of the area may be accommodated in places which would not further erode that identity, other areas would be likely to remove a sense of clear separation and hence settlement identity is lost to development' (p.26). Moreover, Northwich is constrained by Green Belt to the north, and in the context of needing to consider exceptional circumstances for GB release to meet housing targets, it is only logical to first consider potential greenfield development in the countryside, to demonstrate these opportunities have been exhausted. As such, proposed development in KSG's should be prioritised over proposals on GB land.

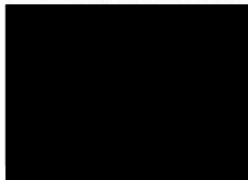
We agree that it is important to maintain the perception of break and separation between settlements to protect and maintain character and local distinctiveness. Our client's site covers 6.67 hectares to the northeast of the KSG, which is relatively small in the context of the whole KSG area. It also adjoins the established residential area at Mereheath Close and Fountain Lane. As such, we consider any proposed residential development at this site would be 'partial development', which as suggested by the Council, would not negatively impact the identity of the area nor the sense of separation between existing settlements. Appropriate levels of development would therefore allow the local distinctiveness of the area to be maintained, particularly at sites such as our client's which would in fact enhance the area in a way that adds permanency of open space in a different way, e.g. through woodland planting. It is for this reason that we argue that flexibility should be provided in the new Local Plan's policy, to ensure the functions of any identified KSGs are accurate and can be balanced against other development needs and constraints so that positive and sustainable growth will not be prevented.

Section 3 - Conclusion

We encourage the Council consider all potential growth and development opportunities for Northwich, including sites on the periphery of Davenham. Our client's site for example, is a fantastic opportunity to support the housing delivery and community-centred growth with the opportunity for a new community facility in the Davenham. It is situated in a highly sustainable location, accessible to public transport and a wide range of existing facilities including the local primary school. It is supported by the Parish Council and local residents as a key contribution to the new Local Plan's spatial strategy.

Thank you for the opportunity to share our views on the suggested approach to the new Local Plan. We look forward to continuing engagement in future consultations through the new Plan's preparation process.

Yours faithfully,



Dan Mitchell
Partner

Marrons

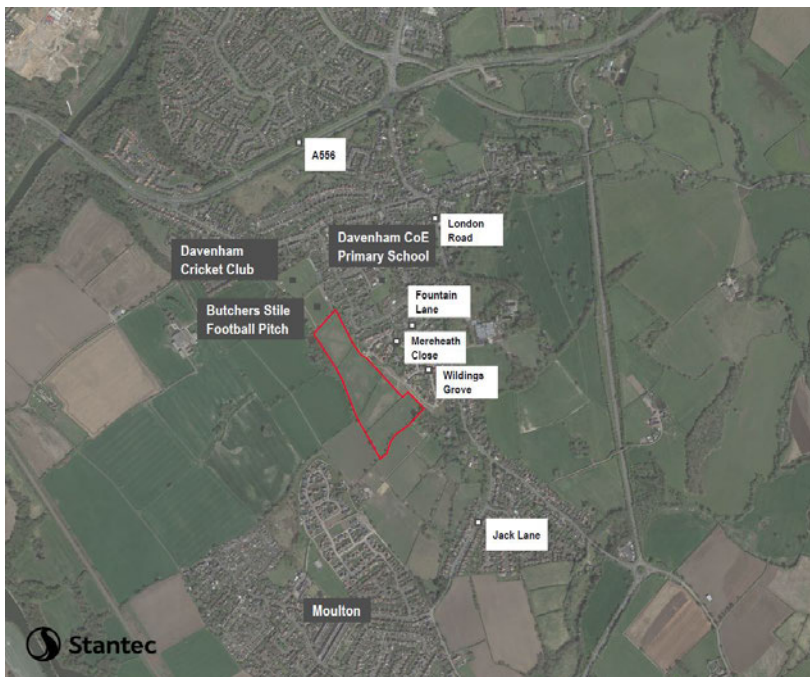

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Cubo Leeds, 6 Wellington Place, Leeds, LS1 4AP

Appendix A: Pre-application advice meeting - presentation slides

DAVENHAM FIELDS
COMMUNITY DEVELOPMENT PROPOSALS
PRE-APPLICATION SUBMISSION
DECEMBER 2024



Site Location - Davenham



Davenham Fields

- 4 Fields
- 6.66 ha (16.5 acres)
- South of Butchers Stile
- West of Fountain Lane
- East of small stream
- Poorly maintained grazing land
- One legal public footpath

- Site Boundary (0.66ha)
- ⋯ ROW - Footpath
- ▨ Butcher's Stile Playing Fields
- ▨ Davenham Cricket Club
- ➡ Indicative Vehicular Access
- ➡ Pedestrian Gateway
- ↔ Potential Pedestrian Connection
- Existing Drainage Ditch

Fountain Lane Development





Public Spaces

Separation woods

- 2.24 hectares (5.5 acres) of rewilding
- Permanent separation with Moulton
- Wildlife corridors to existing habitats
- Public areas for walking, dogs, cycling
- Cheshire Wildlife Trust
 - » Trees for Climate funding
 - » All design, planting, maintenance
 - » Public engagement

Green spaces

- 1.42 hectares (3.5 acres)
- Subdivide development areas
- Fix public footpaths
- Connect existing green spaces
- Space for Parish around Community Centre



Field 1



Field 2



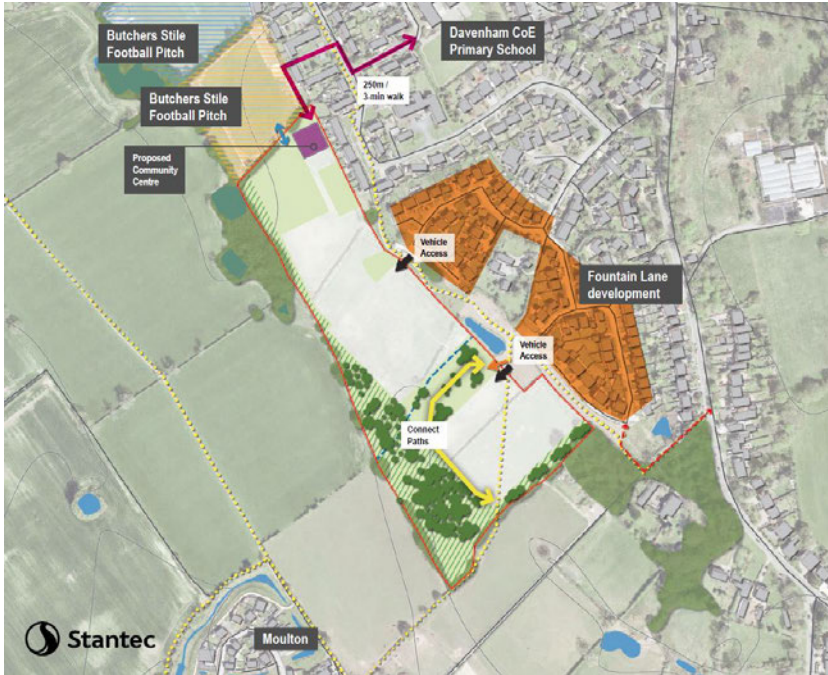
Field 3



Main Access



Second Access



Community Centre

Suitable for Davenham size village and usage priorities defined through community consultation. Possible inclusions are:

Sports Hall/Stage

- Indoor badminton
- Indoor bowls
- Performance stage

Teams Changing Rooms

- Changing for Butchers Stile teams
- Shower facilities
- Male/Female toilets

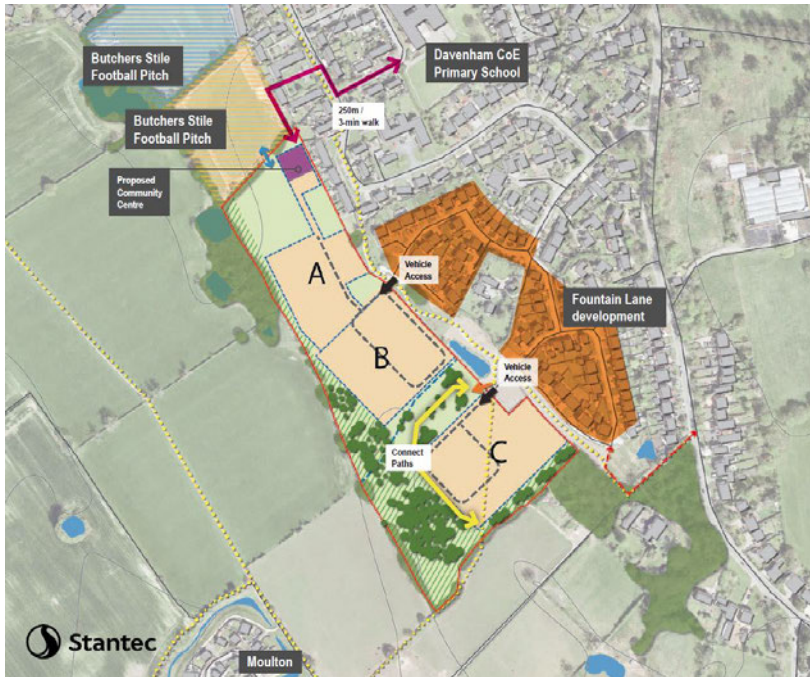
Other Facilities

- Spectators' gallery for Butchers Stile
- Kitchen
- Community meeting/hobby rooms
- Wrap around care (pre- and post-school)
- Activity Storage facilities
- Car parking (school pick up pressure)
- All weather 3g/4g pitch
- Outdoor activities/play area

*Based on Sports England Design Guidelines for Village and Community Halls
Final construct to be defined by budget and community.*

Broadhempston Village Hall





Development

Housing (Areas A and B)

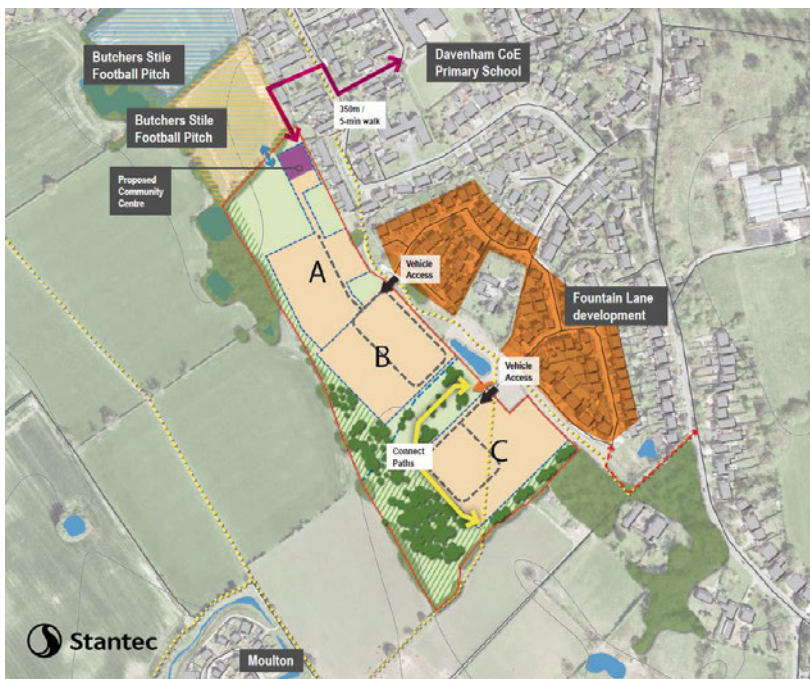
- 2 hectares (4.9 acres)
- 2 x 25/30 units
- Mixed designs
- Avoid estate feel
- Include entry level and retirees' housing
- Close to community centre
- 8 minutes walking to village centre

Detached family housing (Area C)

- 1 hectare (2.5 acres)
- 1 x 25 units
- Mixed designs
- Avoid estate feel
- Close to existing housing on Wildings Grove

Notes

- Existing drainage conserved/upgraded
- Access via Fountain Lane
- Green public space separations
- Low density housing
- Interlinking existing public spaces
- Remove current eyesore



Land Use

Total 6.66 ha (16.5 acres)

Public Land

Total 3.66 ha (9.0 acres)/55%

- Rewilding - 2.24 ha (5.5 acres)
- Green public spaces - 1.27 ha (3.1 acres)
- Community centre - 0.15 ha (0.4 acres)

Private Land

Total 3 ha (7.4 acres)/45%

- Development - 3 x 1 ha (3 x 2.5 acres)

5 Core Benefits to Davenham

- 1) Fully funded Community Centre and parking.
- 2) 1.27 ha (3.1 acres) of additional public spaces for Parish use.
- 3) 2.24 ha (5.5 acres) of permanent physical and visual separation gap with Moulton.
- 4) Low density bungalows/housing suitable for first time buyers and retirees.
- 5) Additional land for related Parish projects.

Working for Davenham