



**CWAC Local Plan  
Issues & Options  
(Regulation 18)**

**Representations**

*on behalf of:*

**Roberts Bakery**

**Land at Roberts Bakery,**

**School Road, Rudheath**

**August 2025**

*Prepared by*

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## 1. INTRODUCTION

- 1.1 These representations have been prepared on behalf of Roberts Bakery in response to the Cheshire West & Chester Council (CWAC) Local Plan – Issues & Options (Regulation 18) Representations – July 2025.
- 1.2 The representations relate specifically to Land at Roberts Bakery, School Road, Rudheath and from this point forward, referred to as 'The Site'. A Site location plan is included at Appendix 1.
- 1.3 These representations seek to provide specific comments on the Sustainability Appraisal, Housing and Employment land Requirements and Spatial Strategy Options particularly for Northwich and Gadbrook Park.
- 1.4 The remainder of this submission is structured as follows:
- Section 2 - The Site and Surrounding Area** sets out the characteristics and locational benefits of the site.
  - Section 3 – Spatial Strategy Options- Response to Council's Questions** this section seeks to provide a response to specifically the relevant questions posed by the Council
  - Section 4- Deliverability & Soundness** this section of the report demonstrates the sites deliverability credentials.
  - Section 5 - Summary and Conclusions** draws together the information presented as part of this submission.



## 2. THE SITE AND SURROUNDING AREA

- 2.1. The Site is located to the south of the A556 and is within proximity to the settlement of Rudheath which forms part of Northwich. The Site extends to approximately 11 hectares. Part of the Site is presently in use for manufacturing purposes with the remainder of the Site undeveloped.
- 2.2. The Site falls within an established employment area (Gadbrook Park) where there are a mix of employment uses ranging from Business uses to light industry, manufacturing and storage & distribution.
- 2.3. The Employment Area Survey 2024 which forms part of the Council’s evidence base, identifies the wider Site as having some vacancies despite the Site ranking highly in terms of market attractiveness with Gadbrook Park falling within a Flagship / Strategic Employment Area. There is also an undeveloped employment land allocation to the southwest of Gadbrook Park.



### 3. SPATIAL STRATEGY OPTIONS – RESPONSE TO COUNCIL’S QUESTIONS

- 3.1 The consultation requests views on several questions. This representation seeks to succinctly respond to relevant questions having reviewed the relevant evidence base documents which are also subject to consultation.

**Question IN 4- Do you have any comments on the initial SA/SEA that accompanies the new Local Plan Issues and Options?**

- 3.2 The Sustainability Appraisal that accompanies the consultation acknowledges the importance of Northwich as a key settlement for future growth, with potential for both housing and employment expansion. Growth scenarios consider the town’s capacity for urban extensions and infill development, balancing land availability with environmental constraints.
- 3.3 Gadbrook Park is identified as an established strategic employment site with a strong role in the borough’s economic framework and confirms a positive score for supporting the local economy. Its sustainability performance depends heavily on addressing transport, environmental, and infrastructure constraints associated with the area. For example, there are limited direct public transport links to this employment area, leading to higher car dependency.
- 3.4 The SA discusses the need to balance the protection of Gadbrook Park as an employment site with other strategic land uses. It is our clients view that by encouraging some expansion of employment uses with alternative uses such as residential and mixed uses, the area and the Site at Roberts Bakery can continue to play a role in the Local Plan’s employment strategy while aligning better with sustainability goals and housing delivery. Expansion for alternative uses can be accommodated on brownfield land which avoids greenfield development when compared to other alternative sites within the Sustainability Appraisal in this location.

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

- 3.5 No. Meeting identified housing needs is a statutory requirement under national planning policy. The plan must ensure housing delivery aligns with the objectively assessed need (OAN) to avoid under-provision, which could lead to unsustainable pressure on neighbouring authorities and infrastructure.
- 3.6 To meet the revised housing target of 28,710 homes by 2040, the Local Plan must plan proactively and effectively distribute growth. Forecasts show continued population growth across the borough, including an ageing population and smaller average household sizes, which increase overall housing demand. In addition, a mix of housing types and tenures supports a diverse workforce and helps sustain local services, schools, and businesses.
- 3.7 The significant need to identify suitable land to deliver a minimum of 1,914 dwellings in CWAC each year is substantial. The consultation document acknowledges that previously developed land will be considered for development first but greenfield and Green Belt land may also be necessary to accommodate housing need. This Site offers the potential to deliver some housing growth alongside maintaining employment uses.

**Question SS 3- Is there any reason for the Council not to plan for delivering a minimum of 9.9 hectares of employment land each year?**

- 3.8 The Council must plan for to deliver both housing and employment land. This is an important Local Plan objective as their mutual interdependence ensures sustainable communities. The need to deliver a minimum of 9.9 hectares of employment land per year is supported in principle, however previously allocated employment sites should not be 'rolled forward' into the new local plan if they are unlikely to deliver the type of employment land needed, or if they are no longer in the most sustainable locations.
- 3.9 The Council's Employment Areas Survey, makes reference to the undeveloped land at Gadbrook Park and outlines in paragraph 7.18, *"The business park includes an undeveloped employment land allocation, and there is currently a relatively high proportion of vacant premises so has scored average on the 'market attractiveness' objective."*
- 3.10 The Council's own evidence base acknowledges that the Park is not delivering the required employment land within the existing plan period. The emerging local plan should re assess its designation and the introduction of other mixed uses including residential, retail and commercial would not be inappropriate. This could assist in ensuring the area remains able to contribute to the

boroughs economic growth alongside sustainable housing growth and associated services and facilities.

**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

3.11 In relation to the Site at Roberts Bakery, all spatial options include the refurbishment and redevelopment of sites in existing employment areas and retaining key employment including Gadbrook Park.

3.12 Gadbrook Park is 56ha in size and a strategic location on the edge of Northwich. Roberts Bakery occupies a prominent position at the entrance to the business park (general industrial use), the remainder of the business park is primarily offices. The business park includes an undeveloped employment land allocation, and there is currently a relatively high proportion of vacant premises

3.13 Retaining employment uses within Gladbrook Park is welcomed, however, this must be considered alongside the introduction of alternative uses to continue to ensure there remains viable for employment uses. The Local Plan seeks to maintain a supply of high-quality employment sites alongside housing growth. Gadbrook Park's role ensures that Northwich retains a strong economic base. This can be further enhanced through reviewing the parks ability to realistically deliver future employment land needed alongside its potential redevelopment to align with the objective of maximising existing sites before allocating sites for development within greenfield and green belt land.

3.14 Paragraph 8.5 of the consultation document outlines how the approach to the level of development will depend on the chosen spatial strategy option but will also seek to maximise housing and other development on previously developed land. The Site offers a large proportion of previously developed land which is within close proximity to Northwich. The Site represents a sustainable housing and employment area if the existing uses within the area are rationalised.

3.15 We would welcome the opportunity to work with the Council to prepare a comprehensive Masterplan for a mix of uses for this Site that could make a significant contribution towards meeting the wider aims and objectives of the emerging Local Plan.

**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?**

- 3.16 Yes, Northwich presents a range of growth opportunities due to its strong socio-economic profile, strategic location, and available infrastructure. The town's role as the third-largest urban area in the borough makes it a natural focus for accommodating both housing and employment growth. The town's growth can be supported through a balanced approach that delivers both housing and employment land, reinforcing its role as a key service and economic centre in the borough. This synergy between homes and employment is not only beneficial for Northwich as a whole but also on a more site specific basis given underused and partly vacant employment sites like Gadbrook Park. This reduces the need for out-commuting, supports local services, and enhances the sustainability of growth.

**Question NO 7 - Do you agree with the suggested policy approach towards Gadbrook Park, as set out in NO 'Gadbrook Park' above? If not please suggest how it could be amended?**

**Question NO 8- Should there be a more flexible approach to uses supported within Gadbrook Park?**

- 3.17 In summary, the policy approach for Gadbrook Park seeks to retain its use for economic development whilst also continuing the allocation of land to southwest of Gadbrook Park for large-scale logistics, warehousing and distribution (as currently allocated under existing Local Plan (Part Two) policy N 4.F).

- 3.18 By the Council's own admission and evidenced in their supporting evidence base documents (Sustainability Appraisal and Employment Areas Survey 2024) it is clearly outlined that " Gadbrook park includes an undeveloped employment land allocation, and there is currently a relatively high proportion of vacant premises so has scored average on the 'market attractiveness' objective. Purpose built office parks are most likely to have been impacted by the covid pandemic and increase in people working from home. When the business park was fully occupied, signage indicates on street parking was a concern for some businesses." (Para 7.18 Employment Area Study 2024).

- 3.19 The question must be asked as to why the wider area as a whole is continuing to be protected as a 100% employment site when clearly there are vacancy issues and a previously allocated employment site has not been delivered through the most recent local plan policy approach. There are multiple

large business who have recently vacated the business park (including Barclay and THG) due to the location not meeting their business needs. This clearly indicates a shift in demand from economic uses on the site and the need to question the long-term future of the site. The Council is urged to engage with local businesses on the site to further understand the market attractiveness of the area in recent years. National policy is clear that the long-term protection of allocated employment sites should not be 'rolled' forward if their deliverability is questionable. Greater flexibility for alternate uses would be advantageous to the Council and to businesses.

3.20 Therefore, in answer to Question NO 8, there should be a more flexible approach to uses supported within Gadbrook Park. Additional mixed uses and some residential use would assist in rationalising vacancy levels and ensuring the long-term viability of the employment area.

3.21 It is agreed that development proposals within this area must be comprehensively planned and that proposals for the refurbishment of vacant office premises for continued economic use should be supported.

3.22 Our client objects to the reference within NO 2, *"New residential development within the policy area would not be permitted. The Council may also take forward Article 4 Directions to remove permitted development rights for residential or other use in the future.* This policy approach is unnecessary, contrary to evidence and would be detrimental to the viability and sustainability of the business park in the plan period. A diverse range of uses is required, and now is the time during this Local Plan review to plan comprehensively and take the opportunity to consider a mix of uses that would sit comfortably alongside one another whilst supporting wider aims and objectives of the emerging Local Plan.

**Question EG 1 - Do you agree with the suggested policy approach towards economic growth, employment and enterprise, as set out in EG 1 'Economic growth, employment and enterprise' above? If not please suggest how it could be amended?**

**Question EG 2 - Do you agree these are the key strategic employment locations that need to be protected? Are there any others to be added?**

3.23 As above, our client objects to Gadbrook Business Park being identified as a continued strategic employment location and safeguarded as essential to meeting the future economic strategy of the plan. The development of the site for other mixed uses whilst retaining some land for use class E(g) would help to ensure its long-term viability. Our preferred approach would be to work with the

Council to deliver a Masterplan for the Site encompassing a range of uses, alternatively, any policy for this Site must make provision for flexibility to enable a mix of uses to come forward in this location.



## 4. DELIVERABILITY & SOUNDNESS

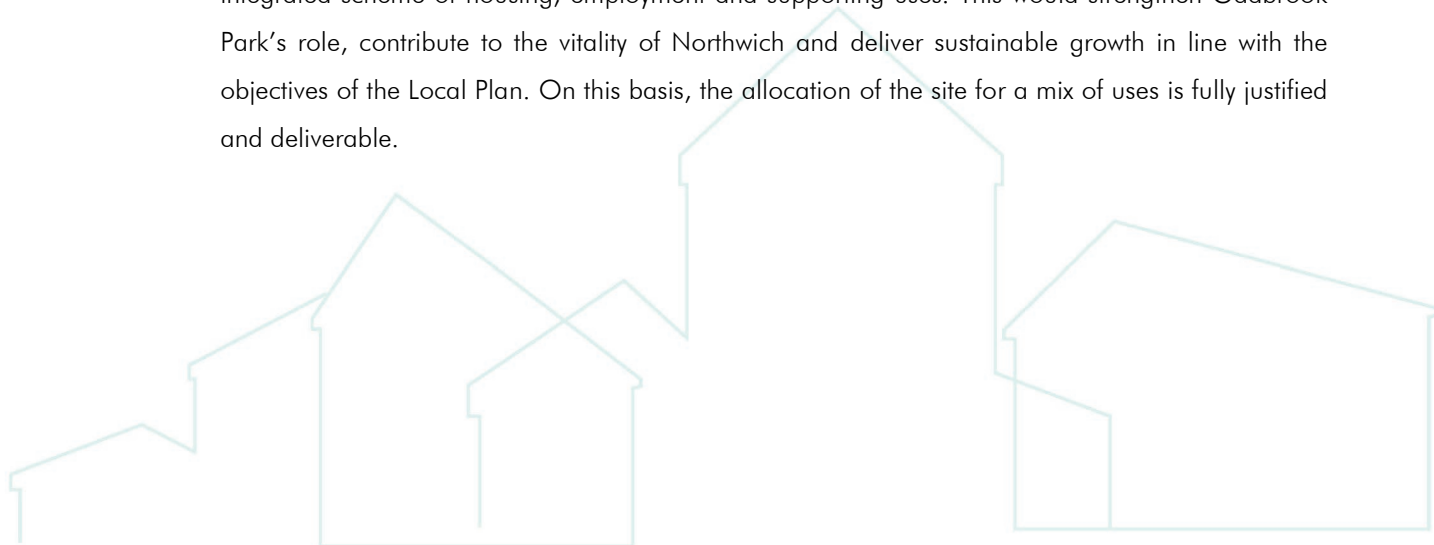
- 4.1. The National Planning Policy Framework (NPPF 2024) requires that Local Plans must be deliverable to be considered sound. Paragraphs 22, 67, 68 and 73 emphasise that plans must allocate sufficient specific, deliverable sites to meet identified needs. Deliverability requires clear evidence that sites are available, suitable, achievable and viable.
- 4.2. The tests of soundness (NPPF, paragraph 35) require plans to be positively prepared, justified, effective and consistent with national policy.
- 4.3. Availability is central to the requirement for a positively prepared plan. The site is controlled by a willing landowner and is being actively promoted through the Local Plan process. There are no legal or ownership constraints that would prevent early delivery, and engagement with delivery partners confirms a clear intention to bring the site forward promptly. By allocating land that is genuinely available now, the Local Plan can be considered positively prepared and able to meet identified housing and employment needs in full. It is critical to acknowledge this Site can provide far reach benefits well beyond employment benefits alone.
- 4.4. Suitability relates to whether the plan is justified. The site is in a sustainable location, well related to settlements, services and infrastructure. Technical work demonstrates that potential constraints, including highways, utilities, drainage, ecology and environmental issues, can all be satisfactorily addressed. Development would also make efficient use of previously developed land, consistent with the NPPF's objective of prioritising brownfield opportunities before releasing less sustainable greenfield or Green Belt sites. Allocating this site is therefore justified, as it represents an appropriate and evidence-based strategy compared to reasonable alternatives, however, simply carrying forward the existing allocation (without flexibility) goes to the heart of soundness.
- 4.5. Achievability underpins whether the plan can be considered effective. The site is achievable within the plan period, with a clear trajectory showing delivery of housing could take place within the first five years. Market demand is strong, and there is confirmed interest from development partners. Infrastructure requirements are proportionate and deliverable, without undermining viability. By identifying sites that are demonstrably achievable, the plan can be regarded as effective and deliverable throughout the plan period.
- 4.6. Viability ensures consistency with national policy. Robust viability evidence confirms that the scheme can be delivered without abnormal costs. Infrastructure contributions will be secured in line with NPPF

paragraph 34, ensuring that necessary supporting infrastructure is provided without undermining deliverability. This demonstrates that the allocation for a mix of uses is consistent with national policy and delivers sustainable development in line with the objectives of the NPPF 2024.



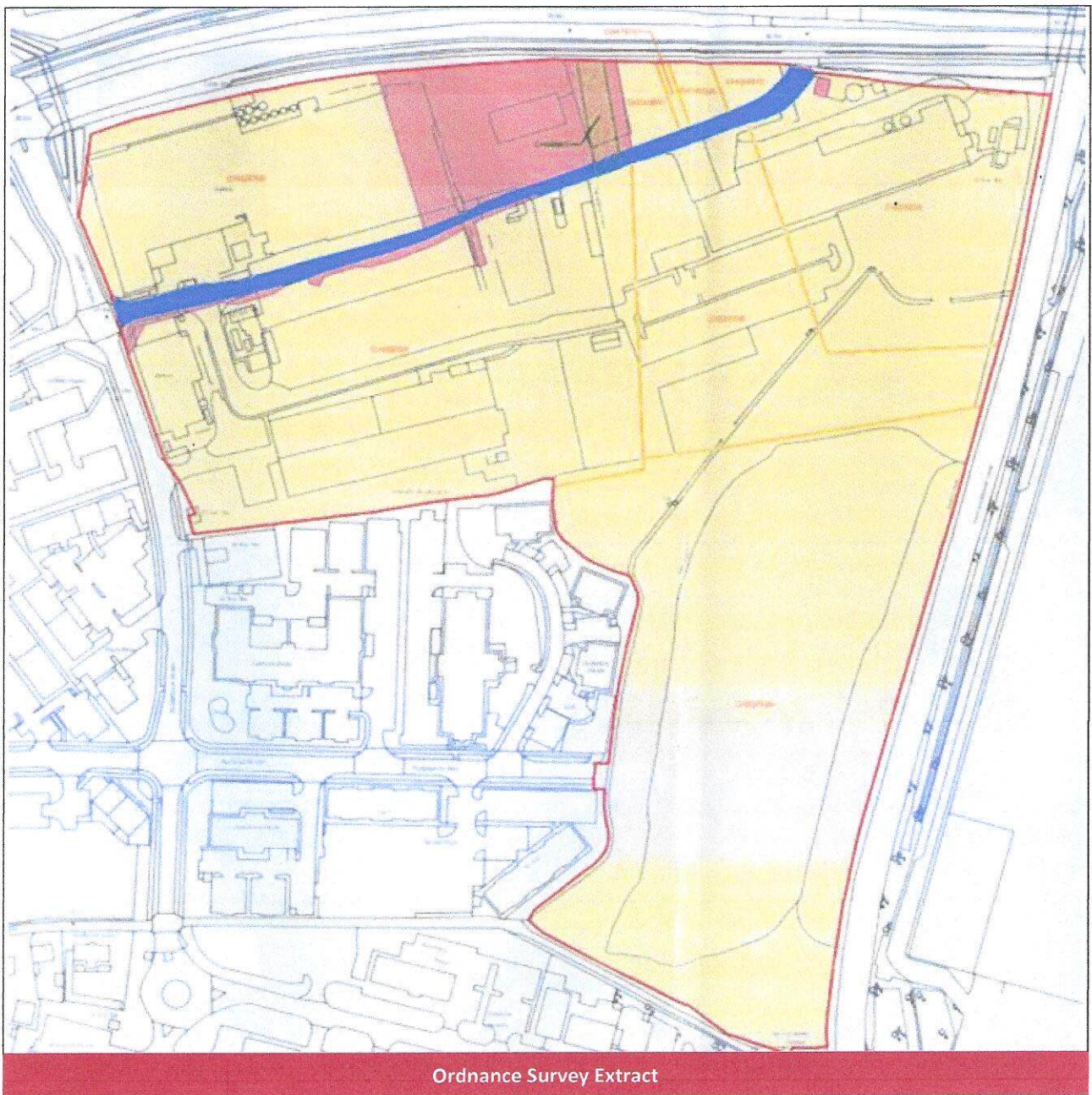
## 5. SUMMARY AND CONCLUSIONS

- 5.1. The site at Roberts Bakery, School Road, Rudheath offers a clear opportunity to deliver a mix of uses that will make an important contribution to the emerging Local Plan. Located within Gadbrook Park, the site benefits from being part of an established employment area, but one which also shows signs of vacancy and underused land. Continuing to restrict the area to employment alone is no longer justified. A flexible allocation would make better use of previously developed land, allow for new housing, commercial / leisure uses and associated community benefits, and at the same time retain a strong employment role.
- 5.2. The Local Plan must provide for both housing and jobs. This site is well placed to help meet those needs, delivering new homes in a sustainable location close to Northwich while modernising and diversifying employment provision. A broader mix of uses at Gadbrook Park would also address existing vacancies and support its long-term viability. In this way, the site can assist in meeting the borough’s annual housing and employment targets while ensuring that land allocations are realistic and deliverable.
- 5.3. The land is in single ownership, being actively promoted and free from legal or ownership barriers. Technical assessments show that highways, infrastructure and environmental matters can be addressed, and the site is viable with the ability to contribute towards infrastructure. It is therefore both available and deliverable early in the plan period.
- 5.4. With the preparation of a comprehensive masterplan, the site can bring forward a balanced and well-integrated scheme of housing, employment and supporting uses. This would strengthen Gadbrook Park’s role, contribute to the vitality of Northwich and deliver sustainable growth in line with the objectives of the Local Plan. On this basis, the allocation of the site for a mix of uses is fully justified and deliverable.



## APPENDIX 1 – SITE LOCATION PLAN





The boundaries of the Property, as we understand them to be, are outlined in red on the copy extract Title Plan above. We confirm this to be the extent of property valued.

## Site Area

The property occupies an inverted “L-shaped site” and is predominantly level throughout.

The various buildings have been developed and extended over the years and occupy various areas contained the overall ownership.

The principal vehicular and pedestrian access into the site is provided directly from Gadbrook Way onto School Road, a single carriage which runs through the centre of the main site and provides tarmac surfaced access to all factory buildings, car park, and yard areas.