

Cheshire West & Chester Local Plan

Representations on Issues & Options Draft

Land at Liverpool Road, Neston

Date of report: August 2025

PREPARED FOR



savills

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Document History

Issue	Date	Issued by	Comment
1.0	14.08.25	JA	First Draft
2.0	20.08.2025	MD	Client Draft for Comment
3.0	27.08.2025	JA	Final for Submission

1. Introduction

- 1.1 Savills (UK) Limited (Savills) is instructed by Northern Trust Land Limited (Northern Trust) submit representations on the Issues and Options (Regulation 18) draft of the Cheshire West and Chester Council Local Plan (New Local Plan).
- 1.2 The current Local Plan for Cheshire West and Chester (CW&C) comprises 2 parts. Part 1 sets out the strategic policies, including the housing requirement, spatial strategy, and strategic designations. This was adopted in January 2015. Part 2 sets out land allocations and detailed development management policies. These are based on the strategic framework set by Part 1. Part 2 was adopted in July 2019.
- 1.3 The Council has resolved to begin the preparation of a New Local Plan which will, upon adoption, supersede both parts of the current Local Plan.
- 1.4 The Issues and Options draft represents the first publication on the New Local Plan and the first opportunities for interested parties to comment. It is supported by Background Papers on a number of settlements within the District as well as background data on settlements.
- 1.5 However, it should be noted that there was a Call for Sites undertaken in early 2024, as well as a consultation on the evidence base that same year.
- 1.6 At the heart of the National Planning Policy Framework (NPPF) is the Presumption in Favour of Sustainable Development (Paragraph 11), which requires plans to meet the development needs of their area and sets out requirements for strategic policies.
- 1.7 These representations will focus on ensuring that the new Local Plan is drafted in accordance with the criterion set out in the NPPF and associated guidance within Planning Practice Guidance (PPG).
- 1.8 The interests of Northern Trust are set out in Section 2, however, for clarity it is seeking to promote land known as 'Milestone Field' at Liverpool Road, Neston for residential development. A Location Plan is provided at **Appendix A**.
- 1.9 The representations will be structured as follows:
 - Section 2 – Background to Northern Trust and The Site
 - Section 3 – Representations on the CW&C Local Plan Issues and Options
 - Section 4 – Summary and Conclusions

2. Background to Northern Trust and the Site

Northern Trust

- 2.1 Northern Trust is a family-owned Lancashire-based property investment and development company that works with Local Authorities to regenerate sites and promote strategic land for housing and commercial developments.
- 2.2 Over the last two years, the strategic land arm of Northern Trust has secured planning permission for around 4,500 new homes. The company currently manages and controls more than 50 sites, with potential to bring forward more than 10,000 homes.
- 2.3 Northern Trust has a successful track record of working closely with landowners, developers, local authorities and communities to deliver development in the UK.
- 2.4 In CW&C specifically, Northern Trust is also promoting other land at Davenham and Christleton. Representations to this consultation are being submitted separately for these sites. This demonstrates Northern Trust's commitment to delivering homes to meet the identified needs for housing in the District.

The Site

- 2.5 The Site is an area of land comprising approximately 3.46 hectares to the northwest of Liverpool Road, Neston. The land is currently used as pastoral grassland.
- 2.6 The Site is in the northeast of Neston and to the immediate west of the Clayhill Light Industrial Park and Aldi Regional Distribution Centre. To the south of the Site there are existing residential properties, with equestrian facilities to the east.
- 2.7 The boundaries to the Site consist of tree planting and hedgerows. The existing agricultural access is from Liverpool Road to the southeast of the Site.
- 2.8 The Site is shown on the map at Figure 1 below and at **Appendix A**.

Figure 1 – Location Plan



Site Designations

2.9 The Site is subject to the following designations, based on currently available data.

Table 1 – Site Designations

Designation Type	Commentary
Fluvial Flooding	The Site is entirely located within Flood Zone 1, indicating the lowest probability of flooding.
Pluvial Flooding	There is a very small area of surface water flooding risk within the Site. This is confined to the boundary and is unlikely to impact on developability.
Heritage Assets	In terms of built heritage, there are no listed buildings within the Site or immediately adjacent to it. The Site is not within a Conservation Area.
Landscape	The Site does not lie in a statutory designated landscape, such as National Park or National Landscape.
Ecology	The Site does not fall within a statutory designated area in terms of ecological value.
Tree Preservation Orders	There are no trees on or surrounding the Site that are protected under TPOs.
Public Rights of Way	There are no public rights of way that traverse the Site.

Site Context

2.10 The Site is located in a sustainable location in the north east of Neston. The Site is approximately 10km from the centre of Ellesmere Port, 25km from Chester City Centre and 11km from Birkenhead town centre.

2.11 In terms of local amenities and facilities, the Site is well located to take advantage of local services. Table 2 below identifies key facilities and respective walking distances.

Table 2 – Distance from the Site to Local Facilities

Type of Facility	Name of Facility	Walking / Cycling Distance
Primary School	Neston Primary School	2km
Secondary School	Neston High School	670m
Leisure Centre	Brio Neston	1km
Food Shop	Aldi	1.2km
Health Centre	Neston Surgery	1.6km
Pharmacy	Galen Pharmacy	1.3km
Park with Play Area	Ringway	500m
Bus Stop	Liverpool Road	130m
Train Station	Neston Train Station	1.2km

- 2.12 The bus stops on Liverpool Road provide services to the centre and south of Neston and also north to Birkenhead.
- 2.13 Neston Train Station provides frequent services south to Wrexham and north to Bidston. From Bidston, passengers can access high frequency Merseyrail services to key centres such as Birkenhead and Liverpool.

3. Representations on the CW&C Local Plan Issues & Options

3.1 This section of the Representations will set out Northern Trust's position in relation to the questions posed in the Issues and Options draft. Where appropriate, reference will be made to the supporting evidence published by the Council.

3.2 It should be noted that answers are only provided to questions pertinent to Northern Trust, its expertise and interests.

Introduction

IN1 - 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?

3.3 The New Local Plan must be based on up to date and robust evidence. The Issues and Options consultation document sets out the following list of additional evidence that is needed to support the new Plan:

- Retail and Town Centres Study (in preparation)
- Strategic Flood Risk Assessment (in preparation)
- Gypsy Traveller Accommodation Assessment (GTAA) (in preparation)
- Housing Needs Assessment (to be prepared)
- Green Belt Study (to be prepared)
- Infrastructure Delivery Plan (to be prepared)
- Strategic Viability Assessment (to be prepared)
- Transport Assessment (to be prepared)
- Land Availability Assessment (in preparation).

3.4 It is considered that the above list of additional evidence is sufficient to inform the policies of the new Local Plan. Savills is supportive of the production of a Housing Needs Assessment, Land Availability Assessment and Green Belt Study which will inform the policies that relate to housing delivery in the new Local Plan.

3.5 It is not considered that there is additional evidence that is required that is not already in preparation or due to be prepared that would be necessary to support the new Local Plan.

IN3 – Do you have any comments or views on the proposed plan period for the new Local Plan?

3.6 National policy requires that new Local Plans should set policies for 15 years following adoption, as a minimum. It is considered that the New Local Plan period for CW&C should cover a minimum of 20 years, due to the scale of strategic development that is required to meet the current and future needs of the borough and to reflect the ambitious housing delivery targets set by Government.

3.7 A plan period of 20 years would ensure that the Local Plan is able to set the strategic policies to meet the current and future needs of the borough.

3.8 As such it is proposed that the Local Plan period should be 2025 – 2045.

Vision

VI3 – 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?

- 3.9 CW&C is a large and diverse borough with distinct towns and settlements that each have specific development needs. As such, the Council's approach is supported which will establish concise visions for the key settlements, in addition to an overarching vision for the whole District.
- 3.10 Local visions for each of the larger settlements (Chester, Ellesmere Port, Northwich, Winsford, Frodsham, Neston and Parkgate) will help to ensure that the specific development objectives of each settlement can be met through the Local Plan policies, which will in turn inform development proposals.

Spatial Strategy

SS1 - Is there any reason for the Council not to plan for delivering a minimum of 1,914 new homes each year?

- 3.11 The Issues and Options draft sets out that the Council's policy approach is to deliver a minimum of 1,914 new homes each year over the plan period, which would equate to 28,710 new homes.
- 3.12 Savills notes that the most recent local housing need figure for CW&C is actually 1,928 dpa, which brings the overall 15 year total to 28,920 homes. While is owing to the incorporation of the latest affordability ratios.
- 3.13 In response to question SS1, the new Local Plan should support the delivery of 1,928 homes per year as a minimum. The requirement for the new Local Plan to meet the standard method figure is clearly established in the NPPF and is the necessary approach that must be taken to ensure that the plan is consistent with national policy.
- 3.14 Emphasis is placed on the fact that the national policy requirement is for Local Plans to adopt the standard method figure **as a minimum**. Savills recommends that the Council should take an ambitious approach and aim to exceed the minimum housing delivery indicated by the standard method, in order to support sustainable growth.
- 3.15 National policy provides that in some cases, authorities will be able to justify a lower housing requirement than the standard method on the basis of local constraints on land and delivery (for example designations such as National Parks etc). Such circumstances do not exist in CW&C that would justify a reduced housing requirement. For example, there are no statutory National Parks in the borough.

SS2 - 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?

- 3.16 The NPPF is clear that authorities are required to set strategic policies to meet their housing need in full across the plan period. To support the Government's objective to significantly boost the supply of homes, it is important that 'a sufficient amount and variety of land can come forward where it is needed'.
- 3.17 Paragraph 70(b) of the NPPF states that to ensure land is allocated for housing in a way that boosts the supply of homes, plans should allocate 'a range of sites by size, type and location to meet the housing requirements of different groups in the community'.
- 3.18 A stepped housing requirement with reduced delivery in the early parts of the Plan period would, in effect, allow the Council to defer its full housing delivery to later phases of the Plan period. In areas

where there are existing acute housing shortages, such as Neston, this would prolong existing issues surrounding affordability and access to housing.

- 3.19 A stepped requirement would also ignore the opportunities for development sites that are immediately deliverable at the initial phases of the Plan period. Reduced targets in the early stages of the Plan period would risk slowing momentum, which conflicts with national housing objectives of boosting housing growth. As such, it is considered that the housing requirement should be clear and consistent throughout the Plan period, which would encourage market confidence and have a positive impact on overall housing delivery.
- 3.20 Finally, the adoption of a stepped requirement would mean that the New Local Plan would have a more limited contribution to the Government's stated aim of delivering 1.5 million homes during the current Parliament.
- 3.21 For these reasons, the New Local Plan should not utilise a stepped requirement.

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?

- 3.22 The Issues and Options consultation document sets out that the spatial strategy will follow the principle of directing new development and allocating land towards previously developed ('brownfield') sites within settlements first. It is acknowledged that previously developed sites within settlements are often sustainable locations to support new development, therefore consideration should be given to the allocation of reasonable previously developed sites..
- 3.23 However, it should be noted that not all brownfield land can be considered deliverable or reasonable alternatives to undeveloped sites. A detailed consideration of the deliverability and availability of each brownfield opportunity will be required to inform the urban capacity of the District.
- 3.24 The spatial strategy principles state that where there are not enough opportunities for redevelopment within urban areas and towns, the approach will be to direct development to the edge of existing settlements in locations with the best access to public transport, services and infrastructure, as the next best sustainable option. The document also states that depending on the settlement, this may require the release of land that is currently designated as Green Belt.
- 3.25 The principles of the spatial strategy as set out in the consultation document are broadly supported. It is a fundamental purpose of the Local Plan to ensure that the development needs of the District are met and that development is directed to the most appropriate and sustainable locations.
- 3.26 While a brownfield-first approach is supported and is consistent with national policy, the scale of development that is required in CW&C (i.e. at least 1,928 new homes per year), and the relative lack of appropriate previously developed sites, means it will be essential for development to be directed to other sites in sustainable locations on the edge of existing settlements. This will necessitate the release of land from the Green Belt.
- 3.27 It follows that the Council will need to provide evidence to demonstrate that exceptional circumstances exist to amend Green Belt boundaries. The NPPF states that such exceptional circumstances can include where an authority cannot meet its identified need for homes through reasonable non-Green Belt alternatives.

SS5 - 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?

- 3.28 The Issues and Options document proposes that the New Local Plan will set out a settlement hierarchy based on the status and role of each settlement. The proposed settlement hierarchy is as follows:

- City – Chester
- Main Towns – Ellesmere Port, Northwich, Winsford
- Market Towns – Neston and Parkgate, Frodsham
- Other Settlements

3.29 Savills agrees with the suggested settlement hierarchy as set out above. Chester is the only City within the borough and therefore performs a principle function and should be placed at the top of the settlement hierarchy.

3.30 Neston and Parkgate is included in the third tier of the proposed settlement hierarchy, categorised as a 'market town' along with Frodsham. This categorisation demonstrates the realistic opportunity for Neston to make a significant contribution to overall housing delivery in CW&C. Neston's inclusion in the settlement hierarchy above other smaller settlements highlights that it is a sustainable settlement that can accommodate proportional housing growth. As such, its inclusion as a market town in the settlement hierarchy is supported.

3.31 The consultation document sets out that the New Local Plan will include individual place-based policies for each settlement which will set out the vision, core features, key issues and clear strategy for what development will take place in each settlement. The place-based policy is supported in principle as this will add clarity in terms of the expectations of the Council for each of the larger settlement areas.

SS9 - Have circumstances changed since the adoption of the Local Plan (Part One), that would now justify Green Belt release?

3.32 The Local Plan (Part One) was adopted in January 2015, which is more than 10 years ago. Since that time, national policy in relation to Green Belt has changed substantially. The most recent version of the NPPF requires local authorities to make plans to meet their local housing need (standard method figure) in full. This requirement stems from the Government's commitment to significantly bolster the delivery of homes and speed up planning in order to deliver 1.5 million new homes over the next Parliament.

3.33 In order to deliver sufficient homes in CW&C to meet its housing requirement and ensure a sustainable pattern of development, some parts of the Green Belt will need to be released for development. This is because the Council will not be able to deliver its housing requirement solely on previously developed sites or other sustainable sites that are available and deliverable, without releasing some Green Belt sites to alleviate the acute need for housing. Particularly if it is focussing on the most sustainable settlements towards the top of the settlement hierarchy.

3.34 Currently, approximately 42% of the borough is designated as Green Belt, which is substantially higher than the national average of 12.6%. This also tends to be focussed around the most sustainable settlements such as Chester, Ellesmere Port, and Northwich.

3.35 While, in accordance with the proposed spatial strategy principles, development should firstly be directed to previously developed land and existing settlements, the release of Green Belt land will be necessary to accommodate sufficient growth in the District whilst ensuring a sustainable pattern of development.

SS10 - Are there any other considerations that we should take account of in relation to future Green Belt policy?

3.36 The New Local Plan should adopt a flexible approach that is consistent with national policy where it relates to Green Belt.

3.37 The Council is required by the NPPF to review its Green Belt boundaries where it is unable to meet its local housing need in full using other appropriate sites. As such, the New Local Plan should

incorporate sustainable development opportunities to deliver homes in sustainable locations that are within the Green Belt.

- 3.38 The Site at Liverpool Road, Neston should be allocated for housing since it is in a sustainable location and can deliver homes in the early stages of the New Plan period.

SS11 - 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

- 3.39 The most appropriate spatial strategies for CW&C are Options B and C above. For the reasons outlined above, namely to ensure the Local Plan is ambitious and plans to deliver sufficient housing, Option A should be discounted, as retaining the current Green Belt extent would restrict realistic opportunities to deliver sustainable development in appropriate locations in the borough.

- 3.40 In order to deliver at least 1,928 new homes per year, the Council will need to assess land that is currently within the Green Belt for its potential to deliver sustainable residential development.

- 3.41 While Savills recognises the prioritisation of previously developed land for housing development, there is not a sufficient supply of available previously developed land in urban areas that is capable of accommodating the housing requirement.

SS14 - Do you feel that Option A is an appropriate spatial strategy for the new Local Plan?

- 3.42 Option A is not considered to be an appropriate spatial strategy for the New Local Plan. The reason being is that the Council is required to meet its local housing requirement in full (being 1,928 homes per annum) as a minimum and in order to fulfil its role in setting strategic policies to meet this requirement, the New Local Plan will be required to allocate sufficient land for housing development.

- 3.43 It is considered that Option A would restrict opportunities for sustainable residential development on the edge of existing settlements that are currently within the Green Belt. It is problematic as it would serve to restrict the growth of some of the most sustainable settlements and result in a pattern of development that is less sustainable.

- 3.44 There is not a sufficient supply of reasonable previously developed land that is suitable and available for housing in CW&C and as such, Green Belt sites must be assessed for their contribution to housing delivery, in accordance with the NPPF.

SS16 - Do you feel that Option B is an appropriate spatial strategy for the new Local Plan?

- 3.45 Option B follows the existing Local Plan strategy and settlement hierarchy which is set out in Policy STRAT 2 of the Local Plan (Part One). That policy locates most new development in or on the edge of 'main urban areas' and an appropriate proportion of new development on smaller settlements which have adequate services, facilities and transport connections.

- 3.46 The Issues and Options consultation document makes clear that a key difference between the adopted Local Plan (Part One) and the New Local Plan is that the current supply of previously developed land that can accommodate new development is much more limited, meaning larger areas of Green Belt and/or sites designated as Countryside are likely to be needed. The explanatory text on Option B explains that, while a proportion of development can be accommodated within

existing settlements, *'much of the new development under this option would need to be located within the Green Belt and/or Countryside'*.

- 3.47 The approach set out under Option B is an appropriate spatial strategy that is entirely consistent with national policy and seeks to bring the adopted Local Plan policy up to date in respect of the spatial strategy. Option B would ensure that new development is directed to the most sustainable and logical locations in the District, which follows the established strategy in the adopted Local Plan (Part One).

SS18 - Do you feel that Option C is an appropriate spatial strategy for the new Local Plan?

- 3.48 Option C seeks to direct residential development to settlements that are served by the rail network and main bus route corridors. This strategy maximises opportunities for sustainable travel choices and could support further improvements to existing public transport services through development.
- 3.49 This Option would require land to be released from the Green Belt in locations that are well-connected by existing transport corridors.
- 3.50 Option C is a logical approach to the spatial strategy that aims to take advantage of existing settlements that are on the railway network or bus routes, as such the Option is considered to be appropriate for the New Local Plan.
- 3.51 However, the extent of development should still be guided by the level of day to day services that are available in the settlements. In that sense the strategy pursued should be a mix of options B and C.

SS21 - What information should we take into account when assessing sites for allocation in the new Local Plan?

- 3.52 At Paragraph 72, the NPPF makes clear that planning policies should identify *'a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability'*. To ensure the New Local Plan is consistent with the NPPF, it is critical that the Council takes into consideration the availability, suitability and economic viability of proposed housing allocation sites.
- 3.53 In terms of availability, the Council should consider the ownership of proposed sites and whether sites can feasibly come forward within the Plan period. In the case of the Site at Liverpool road, Neston, the land is clearly available, since it is under the control of Northern Trust. As such, there are no land assembly or ownership constraints that could pose a delay to development of the land. It is in Northern Trust's interest to secure planning permission and implement the development as soon as possible, should the Site benefit from a residential allocation in the New Local Plan.
- 3.54 In terms of suitability, it is important for the Council to consider the sustainability of proposed allocation sites, in accordance with its policy approach at Policy TA 1. This includes assessing existing provision of public transport services and proximity to settlements and local centres. Locations that are detached from existing settlements or poorly connected to public transport are not sustainable, and therefore are unlikely to be suitable for residential development within the new Plan period.
- 3.55 The Site at Neston is in a sustainable location nearby to existing community facilities and public transport. The Site is appropriate for housing since it is directly adjacent to the existing settlement edge of Neston
- 3.56 When assessing sites for potential allocations, it will be important for the Council to ensure that allocated sites can realistically be delivered within the Plan period. As such, factors affecting deliverability of potential housing sites will be a key consideration, so technical constraints, such as ecology, flood risk and topography should all be taken into account when the Council assesses sites for potential allocations.

SS53 - Which of the identified potential growth areas around Neston and Parkgate do you consider to be the most suitable?

- 3.57 In response to question SS53 above, the potential growth area that is considered to be most suitable is NEP02, which is a mixed use growth area identified to the north east of Neston. This growth area includes land that is being promoted by Northern Trust for residential development, off Liverpool Road.
- 3.58 NEP02 is in a highly sustainable location on the edge of the existing settlement of Neston. The area is served by existing rail and bus public transport networks. It follows that development within this growth area can be sustainable and make a significant contribution to the housing development needs of the District.
- 3.59 For this reason, NEP02 should be considered ahead of other potential growth areas in Neston and Parkgate.
- 3.60 For clarity the Northern Trust land is highly suitable for residential development owing to its proximity to Liverpool Road and other residential development. In this sense this land should comprise the residential element of a mixed use allocation.

SS54 - Do you have any further comments about any of the potential growth areas identified around Neston and Parkgate?

- 3.61 All of the potential growth areas that the Council has identified around Neston and Parkgate are within the Green Belt. As such, none of the growth areas would be consistent with Option A of the spatial strategy which seeks to retain the current Green Belt boundaries.
- 3.62 This is a clear indication that the development needs of Neston and Parkgate can only be addressed if sites that are in the Green Belt are considered for release. On this basis, the Council should first consider the more sustainable sites in the Green Belt that are located nearby to existing facilities and services and that are served by existing public transport options.
- 3.63 Potential growth area NEP02 is a highly sustainable location that could deliver development that is proportionate to the needs of Neston. As such, it should be considered as a priority location for growth and development.

SS55 - Are there any constraints, including infrastructure provision, that should be considered for Neston and Parkgate when developing the new Local Plan?

- 3.64 There are no known constraints, including those concerning infrastructure provision that should be considered for Neston and Parkgate when developing the New Local Plan.
- 3.65 It is noted that residential development can bring various social, environmental and economic benefits, including for infrastructure.
- 3.66 The Council is encouraged to be ambitious and plan to meet its housing needs in full within the Plan period, in accordance with the NPPF.
- 3.67 Section 106 agreements, as well as CIL contributions, will ensure that sufficient financial contributions will be made to the expansion of existing facilities, or provision of new ones, should they be required to make development acceptable in planning terms.

Neston and Parkgate

NE 1 - Do you agree with the suggested policy approach towards Neston and Parkgate, as set out in NP 1 'Neston and Parkgate' above? If not please suggest how it could be amended?

- 3.68 At section NP 1 of the Issues and Options consultation document, the policy approach for the New Local Plan is set out. The document states that Neston and Parkgate will be identified as a market town in the New Local Plan settlement hierarchy.
- 3.69 The New Local Plan will also set out the location of new development around the town, which may require the release of Green Belt land.
- 3.70 In terms of its proposed position on the Settlement Hierarchy, Neston will be categorised as a market town, which sits on the third tier of the hierarchy along with Frodsham. The top tier of the hierarchy is Chester (City) followed by Ellesmere Port, Northwich and Winsford as 'Main towns' on the second tier. As a market town, Neston and Parkgate sits above other settlements of Cuddington and Sandiway, Farndon, Helsby, Kelsall, Malpas, Tarporley, Tarvin and Tattenhall.
- 3.71 Savills is supportive of the broad policy approach set out for Neston and Parkgate, particularly where the policy wording aims to provide a mix of new homes, especially affordable market and social housing for young people, students, families, starter homes and smaller properties to enable downsizing and meeting the needs of older residents.
- 3.72 The policy approach will be generally reflective of the objectives of the Neston Neighbourhood Plan, which is also supported.

Transport and Accessibility

TA1 - Do you agree with the suggested policy approach towards transport and accessibility, as set out above in TA 1 'Transport and accessibility'? If not please suggest how it could be amended?

- 3.73 The Issues and Options consultation draft sets out that the Councils overall approach to transport is to minimise the need for travel, particularly by single-occupancy cars and vans, by locating development so it is accessible to local services and facilities by a range of transport modes. The draft document sets out a sustainable transport hierarchy, which is as follows:
- People walking or wheeling
 - People cycling or riding
 - People using public Transport
 - People driving ultra-low emission and shared vehicles
 - Delivery and logistics in internal combustion engine vehicles
 - People driving other private motor vehicles.
- 3.74 In terms of new development, the draft Local Plan document sets out that new development will be encourages in more sustainable locations. This means that developments should maximise opportunities for people to be able to meet day-to-day needs within a reasonable (10 minute/ 800 metre) walking distance of their homes, as well as being able to travel outside of their settlements by a range of sustainable transport choices.
- 3.75 In response to question TA 1, the Council's suggested policy approach towards transport and accessibility is broadly supported. The element of the draft policy that encourages new development in sustainable locations that benefit from existing connections to sustainable transport modes is particularly supported, since these locations can make a significant contribution to sustainable development.
- 3.76 The land at Liverpool Road, Neston is in a highly sustainable location that is consistent with the key principles of the draft policy TA 1. It is in a location where everyday services and facilities can be reached on foot or by cycle and is nearby to a bus stop which is served by the 487 local bus service that provides direct connections to Birkenhead.

Infrastructure and Developer Contributions

ID1 - Do you agree with the suggested policy approach towards infrastructure and developer contributions, as set out above in ID 1 'Infrastructure and developer contributions'? If not please suggest how it could be amended.

3.77 The NPPF states at Paragraph 35 that Plans should set out the contributions expected from development. At the same paragraph, the NPPF makes clear that such policies should not undermine the deliverability of the plan.

3.78 Savills broadly supports the proposed infrastructure and developer contributions policy under section ID1. However, the issues and options draft states that the policy approach will clarify that where infrastructure is needed to sustain a new development, off-site contributions may not be acceptable, and this approach is questioned. It is considered that this approach could fail to take due consideration of smaller sites that are constrained and therefore may not be able to deliver necessary infrastructure on-site. In these circumstances, off site contributions are a way of mitigating the impacts of development through financial contributions, established under a legal agreement tied to a planning permission.

ID2 - Should developer contributions only apply to major developments? How should 'major development' be defined?

3.79 Developer contributions should only apply to major developments. It is suggested that the definition of 'major development' should be consistent with the definition given in the NPPF, as this will aid clarity and consistency between local and national policy.

3.80 The NPPF explicitly states that for housing, major development relates to development where two or more homes will be provided, or the Site has an area of 0.5 hectares or more.

ID3 - Do you agree that developers/ operators should pay the full cost of infrastructure required to deliver their sites?

3.81 In the case of housing development, financial contributions can be secured by S106 agreements in order to enable the provision of new site specific infrastructure, or upgrade existing site specific infrastructure, required to make development acceptable in planning terms.

3.82 These contributions are supplemented by CIL contributions towards non-site specific infrastructure.

3.83 In this sense, developers already pay the full cost of the infrastructure required to deliver new homes.

ID4 - In the event of viability being an issue how could the new Local Plan prioritise the provision of infrastructure across the borough and/ or on a settlement-by-settlement basis?

3.84 It is considered that site specific infrastructure that is essential for delivery should be prioritised. This may require a reduction in affordable housing contributions, or flexibility in affordable tenure mix, to enable this to happen.

Housing

HO1 - 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?

3.85 The Issues and Options draft document states that the new policy approach will provide detailed requirements for various types and proportions of housing. It is important that the New Local Plan is not overly restrictive as it must allow flexibility to enable sites to come forward that can deliver a range of house sizes in different proportions that reflect both need and market demand.

- 3.86 Until the Housing Needs Assessment is updated, comments cannot be made in relation to the housing mix policy details. In terms of specialist and accessible housing (M4(2) / M4(3) the proportion of homes that meet these standards should reflect the evidence. This is not likely to require that all homes meet these standards as a blanket requirement

HO2 - Should the housing mix and type and specialist housing be delivered through a percentage policy approach that sets requirements for each category of housing?

- 3.87 As mentioned above, it is important that the policy approach to housing mix taken in the new Local Plan provides for a mix of different types and sized of housing to come forward to meet the diverse housing needs of the District. It is appropriate that the housing mix policy should be informed by an up to date Housing Needs Assessment. Until that Assessment is complete, comments on the details of the policy cannot be made.

- 3.88 A percentage policy approach would appear to be a logical approach. However, such percentages would need to be reflective of a robust evidence base.

- 3.89 It should be noted however that policies in the New Local Plan must take a flexible approach that takes into consideration site-specific factors. There should be flexibility built into the policy to not restrict housing development from coming forward where sites can make an important contribution to the overall housing delivery in the Borough.

HO4 - 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?

- 3.90 The draft Issues and Options document sets out the policy approach to be taken in the New Local Plan in relation to affordable housing at section HO2. The approach will reflect the government's requirement for housing development in the Green Belt to provide at least 50% affordable housing, whether land has been released from the Green Belt through a housing allocation, or an application.

- 3.91 Affordable housing will be required on all sites of 10 or more dwellings part from in designated rural areas, where the threshold will be three or more dwellings.

- 3.92 The general policy approach towards securing affordable housing is supported in principle. As above, it is important that the detailed policy includes sufficient flexibility and takes into consideration site specific factors, such as ground contamination, that could impact viability.

- 3.93 The Council should take a pragmatic approach that enables a sufficient supply of affordable housing to come forward as part of housing developments, while taking into account the potential for viability challenges on some sites which may influence the provision of affordable housing.

- 3.94 This is particularly the case in terms of affordable housing tenures with an increased percentage of affordable home ownership and intermediate tenures, particularly where the golden rules in relation to Green Belt release apply.

Health and Wellbeing

HW1 - Do you agree with the suggested policy approach towards health and wellbeing, as set out in HW1 'Health and wellbeing' above? If not, please suggest how it could be amended?

- 3.95 High quality developments can make a positive impact on health and wellbeing. Likewise, development proposals that are poor quality can give rise to adverse impacts on health and quality of life.

- 3.96 The Issues and Options draft sets out the Council's policy approach to health and wellbeing and confirmed that where it is considered likely that a proposal will result in significant environmental

effects during the construction phase, a Construction Environmental Management Plan (CEMP) will be required.

- 3.97 The document states that proposals should aim to promote access to green space across the borough that widen and strengthen the boroughs cultural, sport, recreation and leisure offer.
- 3.98 The Council's approach to health and wellbeing is supported. The proposals for residential development at Chester Road, Kelsall will create wide-ranging benefits for health and wellbeing and the application will be supported by a Health Impact Statement.

HW3 - Should we consider reviewing the separation distances between facing windows of main habitable rooms, as set out in current Local Plan (Part Two) policy DM 2 Impact on residential amenity, and include them in a policy in the new Local Plan?

- 3.99 In response to question HW3, while the importance of providing high quality residential amenity is supported, it is important that any policy that prescribes separation distances allows flexibility to consider site-specific factors.
- 3.100 Rigid design standards, such as separation distances, can limit site capacity and reduce density. Local variations in separation distance policies also create uncertainty and inconsistency for developers.
- 3.101 As such, any design policy, including those related to separation distances should include flexibility to ensure development is context-specific while ensuring a high standard of residential amenity.

HW4 - What is an appropriate quantity of outdoor amenity space to be provided in new developments? What approach should we apply to apartments/flats?

- 3.102 The New Local Plan should set out a recommended quantity for outdoor amenity space to be provided in new developments. However it is important that the relevant policy takes due consideration of other existing and future outdoor amenity spaces that are accessible.
- 3.103 The open space policy should be flexible to allow constrained sites that are suitable for housing to come forward and contribute to open space via contributions or off site provisions.

Open Space, Sport, Recreation and Community Facilities

OS1 - 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?

- 3.104 The Issues and Options consultation document sets out the Council's policy approach to open space, sport and recreation. The broad approach will aim to protect, manage and enhance existing open spaces and facilities. This policy approach is broadly supported and is consistent with the NPPF.
- 3.105 The draft policy text states that open space provision in new developments should be sought in the following order: on site, off-site, as a financial contribution. It is important that any policy takes into account new development on sites that cannot accommodate open space provision onsite, and in these circumstances, off-site provision or financial contributions are reasonable alternatives.
- 3.106 In terms of recreational routeways, the draft policy wording states that proposals that enhance public access and the recreation value of the recreational routeway network will be supported. Savills support this element of the policy and that the routeway network will be identified on the policies map. However it will be important that the routeway policy is applied in a flexible manner insofar that it does not prohibit sustainable residential development from being delivered.

OS2 - Are the current thresholds for developer contributions for open space and playing pitches suitable, or do you have any comments or suggestions for what they should be?

- 3.107 The thresholds for developer contributions for open space are detailed in the CW&C Council Developer Contributions Technical Guidance Note. That document sets out the onsite and financial contributions required for 'amenity greenspace', 'play children', play youth', 'allotment', 'parks and recreation' depending on the proposed number of residential units.
- 3.108 For proposed developments of 10 or fewer units, no contributions are due, which is an appropriate policy approach. For proposed developments of more than 10 units, there are various onsite and off-site requirements depending on the size of the proposals.
- 3.109 The broad approach is supported, however it is important that the policy is applied with sufficient flexibility to enable homes to come forward in sustainable locations. The importance of providing physical and financial contributions to open recreational spaces is acknowledged, however the scale of housing need in CW&C is such that the policy must take a pragmatic approach and prioritise sustainable housing delivery.

OS3 - Is the current evidence sufficient or does it require updating (Open Space Study and Playing Pitch Strategy)?

- 3.110 The Council's Playing Pitch Strategy (PPS) was originally produced in 2021 and has since been updated in February 2025. A PPS is said to have a lifespan of three years, although this can be increased if it is kept up to date. Since it has been updated earlier this year, the PPS does not currently require an update, however it should be reviewed annually to ensure it is accurate.

Landscape

LA1 - 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?

- 3.111 The consultation document sets out at LA 1 that policies should protect and wherever possible enhance landscape character and local distinctiveness.
- 3.112 Savills agrees with this policy approach.

LS2 - 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?

- 3.113 In response to question LS2 above, the key settlement gaps should be reviewed in light of the current local housing need, which is a minimum of 1,928 new homes per year. As discussed above, for the Council to make sufficient land available to deliver the required homes, some land will need to be released from the Green Belt. This may also include land that is currently defined in Local Plan (Part Two) Policy GBC 3 as a key settlement gap.
- 3.114 On the basis that the Council is required to make enough land available to meet its local housing need in full within the Plan period, the key settlement gaps should be reviewed to ensure the policy does not restrict sustainable residential development from coming forward. This approach would be consistent with the NPPF where it requires local authorities to meet local housing needs in full and to review Green Belt boundaries where necessary.

Green Infrastructure, Biodiversity, and Geodiversity

GI2 - Should new development contribute to woodland in Cheshire West and Chester? 5. Is a 2:1 ratio enough for a tree replacement policy?

3.115 At GI 1, the Issues and Options consultation document sets out the policy approach towards Green Infrastructure, Biodiversity and Geodiversity. In response to the tree planting ratio specifically, the 2:1 proposed ratio is appropriate and would significantly increase the overall number of trees in the District. An increased requirement for tree replacement would place a substantial cost on developers which can reduce developer confidence and in turn the rate of development.

3.116 There should be flexibility built into this policy to ensure that if there are site specific reasons why a large number of trees need to be removed, this can be accommodated without an unrealistic replacement programme.

GI3 - Should new Local Plan policy go above the 10% mandatory biodiversity net gain set nationally?

3.117 The mandatory requirement for certain developments to deliver a minimum 10% net gain in biodiversity is provided by the Environment Act 2021.

3.118 Savills consider that the New Local Plan should reflect the 10% requirement and not increase the requirement beyond this. It should be noted that the statutory requirement is for a minimum of 10% net gain to be provided as such, depending on the site specific constraints, viability and other factors, the legislation is designed to set the 10% as a minimum.

3.119 If the Local Plan adopted a policy requirement above the 10% mandatory requirement, this could risk reducing the number of homes that can be delivered, since an additional cost would be placed on developers, which could impact the viability of potential housing developments. The viability assessment supporting the New Local Plan would have to consider the financial implications of this.

3.120 The New Local Plan should reflect the national mandatory requirement of a minimum of 10% net gain.

Design and Sustainable Construction

DS1 - Do you agree with the suggested policy approach towards high quality design, as set out in DS1 'High quality design' above? If not please suggest how it could be amended?

3.121 At DS 1, the Issues and Options Consultation document sets out that the New Local Plan will promote sustainable, high quality design and construction.

3.122 Savills broadly supports the approach to design policy, particularly in relation to making the best use of high quality materials and reducing the opportunity for crime and disorder, and the fear of crime.

3.123 While the broad policy approach is supported, the New Local Plan should ensure that policies relating to design are flexible and take into account site characteristics.

3.124 With regards to Nationally Described Space Standards (NDSS) it should be noted that these can only be introduced where there is a clear need and the introduction of the Standards would not impact development viability. The Council will need to demonstrate robust justifiable evidence to introduce the NDSS.

3.125 It should also be noted that well-designed homes that are below NDSS provide high quality, functional homes, which are appropriate for various budgets. Smaller dwellings play a valuable role in meeting specific needs for both open market and affordable home ownership housing.

DS2 - If the Council produces a borough-wide Design Code, should this form part of the new Local Plan?

3.126 In response to question DS2, if the Council produces a borough-wide Design Code, this should inform the New Local Plan so that design policies are consistent and evidence-based.

- 3.127 Design policy that is clear and consistent and informed by a borough-wide Design Code will help inform development proposals for major development and will add clarity to what is expected of developments in terms of design. This will in turn increase developer confidence, which will have a positive influence on development.

DS6 - Do you think that the new Local Plan should set a higher local standard beyond the building regulations requirements to achieve net zero carbon in all new developments?

- 3.128 Northern Trust acknowledges the importance of advancing energy efficiency through a nationally consistent set of standards and a timetable that is universally understood and technically feasible. This aligns with the Written Ministerial Statement of December 2023 (WMS), which states that the Government does not expect plan-makers to set local energy efficiency standards for buildings that exceed current or planned building regulations.
- 3.129 The WMS clearly indicates that any planning policies proposing local energy efficiency standards for buildings that go beyond current or planned building regulations should be rejected at examination if they lack a well-reasoned and robustly costed rationale. This rationale must ensure that development remains viable and considers the impact on housing supply and affordability in accordance with the NPPF. Additionally, any extra requirements should be expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER), calculated using a specified version of the Standard Assessment Procedure (SAP).
- 3.130 Therefore, if the Council wishes to pursue this policy, it should use the TER and ensure that they have a well-reasoned and robustly costed rationale that fully considers viability and the potential impact of the policy on housing supply and affordability.

4. Summary and Conclusion

- 4.1 Savills is instructed by Northern Trust to make representations on the Issues and Options draft of the New Local Plan for Cheshire West and Chester.
- 4.2 Northern Trust has an interest in Land at Liverpool Road in Neston, which it is promoting to be included in the New Local Plan as an allocation for housing. These representations make reference to this land in order to illustrate wider points in relation to the production of the new Local Plan.
- 4.3 Northern Trust is supportive of the Council's decision to prepare a new Local Plan and welcomes the opportunity to engage with this, and future consultations.
- 4.4 In general the Council is encouraged to be ambitious. This is both in terms of addressing the current housing crisis and moving towards carbon neutrality.
- 4.5 In terms of housing specifically, much of this is dependent on ensuring the right requirement, apportioning this housing to the right general locations, and ensuring that the most sustainable sites are allocated for delivery. These representations have stated a suitable course for the new Local Plan to follow.
- 4.6 Land at Liverpool Road, Neston represents an excellent opportunity to deliver market and affordable housing in a highly sustainable location in the District.

Appendix A Location Plan



Contact

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Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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