



Representations:
Cheshire West &
Chester Council
Regulation 18
Consultation

Land on the East side of London Road,
Davenham

Tesni Properties Limited
August 2025

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1 INTRODUCTION

1.1.1. Tesni Properties Limited is a privately owned company based in Mold, Flintshire. Traditionally from a land promotion background the organisation has extensive experience and expertise in nationwide strategic land, as well as evidence of a diverse portfolio of commercial and residential developments within Cheshire, Shropshire and Telford & Wrekin. Tesni seek to be proactive and actively contribute to the preparation of the development plan, making the appropriate representations throughout the Local Plan process.

1.2 OVERVIEW

1.2.1. These representations have been prepared by Tesni Properties Limited (hereafter referred to as Tesni), alongside Mrs.S. Ganczarski and Mr. R. Leigh, in response to Cheshire West and Chester Council's (CW&C) Regulation 18 Local Plan Issues and Options consultation and the associated evidence base.

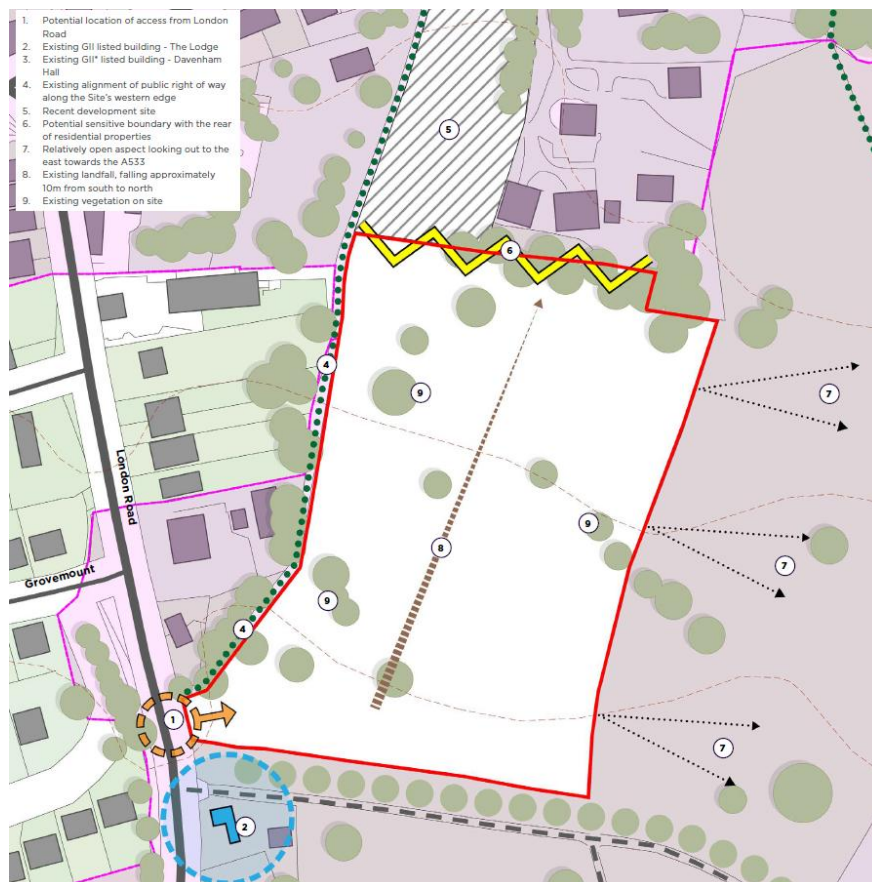


Image One: Key Considerations Plan (Ref: P21_079_004; Carter Jonas, 2021)

- 1.2.2. More specifically the following comments are made in the context of Tesni Properties' land interest at Land to the East of London Road, Davenham. A 3 hectare site located within a contained parcel of land that is adjacent to the settlement boundary.

1.3 PLANNING POLICY BACKGROUND

- 1.3.1. The documents that make up the current adopted development plan for CW&C are as follows:
- Local Plan (Part One) Strategic Policies – adopted on 29th January 2015;
 - Local Plan (Part Two) Land Allocations and Detailed Policies – adopted on 18th July 2019.
- 1.3.2. As outlined above, the current Local Plan is structured in two parts. The Part One Plan, adopted in 2015, covers the period 2010–2030. This establishes the overall vision, strategic objectives, spatial strategy and strategic planning policies for the borough. This includes setting the overall housing requirement, the distribution of new housing land, the identification of strategic sites, and amendments to the Green Belt – all of which are defined as strategic matters.
- 1.3.3. The Part Two Plan, adopted in 2019, provides the more detailed policies and land allocations required to deliver the overarching strategy set in Part One. It is structured around a series of area-specific policies (CH1 to M8), which include land allocations and policies for the development of land within the settlement areas identified in Part One. It also includes Development Management policies (DM1 to DM55), which set out the criteria against which planning applications for new development are assessed. Following the adoption of Part Two, all policies from the former district and county Local Plans were deleted and replaced either by a policy within the Cheshire West and Chester Local Plan (Parts One and Two), or by the National Planning Policy Framework (NPPF).
- 1.3.4. This two-part plan structure has provided a framework for growth to date, but it is now becoming out-of-date. With the end date of 2030 approaching, and in light of revised national policy and updated housing requirements. Tesni is supportive of the Council's proposal to commence work on a new single Local Plan. This creates an important opportunity to reassess how housing and employment growth is distributed, and to consider the role of smaller rural settlements in delivering sustainable and deliverable growth.
- 1.3.5. The regulation 18 consultation seeks views on the emerging options to accommodate 29,000 homes and 150 hectares of employment land over the plan period. This represents a step

change in delivery compared with the adopted plan and underlines the need for a flexible and responsive strategy that draws on a broad range of locations and settlement types.

- 1.3.6. The consultation identifies a minimum housing need of 1,914 dwellings per annum, derived from the Government's Standard Method for assessing local housing need. While the Standard Method provides a consistent baseline across England, the Planning Practice Guidance (PPG) makes clear that this figure should be treated as the starting point, not the final requirement. Local planning authorities are expected to consider whether the baseline should be increased to take account of economic growth aspirations, market signals, affordability pressures, and unmet needs arising from neighbouring authorities.
- 1.3.7. In the case of Cheshire West and Chester, there are compelling reasons to plan for a housing requirement above the Standard Method baseline. Affordability ratios in the borough remain high, particularly in rural and semi-rural areas, where younger households face increasing barriers to home ownership. Delivering a higher level of housing growth would help to address these affordability challenges by boosting supply and increasing the range and mix of homes available.
- 1.3.8. The Council also has ambitious economic growth objectives linked to strategic infrastructure projects, including investment in Chester, Ellesmere Port, and the Cheshire Science Corridor. These initiatives will attract and retain a skilled workforce, but only if sufficient housing is provided in the right locations. Planning to meet only the minimum baseline risks constraining the borough's economic potential.
- 1.3.9. Furthermore, the Council should recognise the importance of housing delivery trajectories when setting its requirement. A plan that is too heavily dependent on large, complex sites will struggle to maintain a rolling five-year supply, creating exposure to speculative development. To safeguard against this risk, the housing requirement should be set at a level that allows a broad mix of sites — including small and medium-sized allocations in rural settlements such as No Mans Heath — to come forward alongside the larger strategic sites. This diversified approach will not only support delivery but will also strengthen the Council's ability to demonstrate a sound plan at examination.

1.4 GROWTH OPTIONS

- 1.4.1. Three broad options have been presented by CW&C within this regulation 18 consultation. While these scenarios explore different distributions of growth, they share a common emphasis on directing the majority of development to the main towns and service centres. Whilst this

proposal evidently comes with its advantages, it is essential that the plan also recognises the role of smaller settlements in contributing to housing delivery. Over-reliance on large strategic sites or heavily constrained urban areas risks undermining the Council's ability to maintain a deliverable five-year housing land supply, which is a key test of soundness under national policy.

1.4.2. Each of the three potential spatial distribution strategies have been tested through the Sustainability Appraisal process and provides a useful starting point for debate. However, it is important that the Council maintains flexibility and does not commit too rigidly to any single option at this early stage. A hybrid strategy, which combines the benefits of each option while addressing their respective shortcomings, will be required to ensure the new Local Plan is positively prepared, justified, effective, and consistent with national policy.

1.4.3. **Option A: Protecting the Green Belt**

This option seeks to minimise Green Belt release by directing the majority of new housing and employment growth to settlements outside the Green Belt, notably Winsford, Northwich, and other non-Green-Belt towns. It also places greater emphasis on expansion within Rural Service Centres. While this approach is consistent with national policy in terms of safeguarding Green Belt land, it creates significant risks. It places undue pressure on a limited number of urban locations, many of which are already contending with regeneration challenges and infrastructure constraints. Relying too heavily on brownfield and regeneration sites can create uncertainty around delivery rates, especially where land assembly, remediation, or market demand issues are complex. From a Tesni perspective, Option A does not provide the necessary flexibility or diversity of supply to maintain a robust five-year housing land supply across the plan period.

1.4.4. **Option B: Continuation of the Current Approach**

Option B broadly reflects the adopted spatial strategy, distributing growth across Chester, Ellesmere Port, Winsford, Northwich, and the network of Key Service Centres. Under this scenario, around 11,000 homes would be delivered through Green Belt release. This approach offers a more balanced distribution of growth compared to Option A, aligning new homes with employment opportunities and existing transport networks. It also reduces over-reliance on regeneration sites, recognising the contribution that strategic Green Belt releases can make to overall supply. However, the risk with Option B is that too much emphasis is placed on large strategic sites, which typically require long lead-in times, substantial infrastructure investment, and complex phasing arrangements. This can undermine delivery in the early years of the plan period. To make this option effective, it should be complemented by smaller-scale allocations in

a wider range of settlements, ensuring that housing can come forward quickly and steadily throughout the borough.

1.4.5. Option C: Transport Corridor Growth

This option seeks to concentrate development along established and emerging sustainable transport corridors, particularly rail and bus routes. More than 12,000 homes would be delivered through Green Belt release to support this option. In principle, aligning growth with public transport infrastructure is consistent with the objectives of the National Planning Policy Framework and reflects broader sustainability goals, including reducing car dependency and promoting compact development. However, the deliverability of this option is contingent on significant transport investment being secured and delivered in a timely manner. If these improvements are delayed or scaled back, the housing trajectory could falter. Furthermore, focusing growth so narrowly along transport corridors risks neglecting the role of smaller settlements which, although not served by high-frequency public transport, are still sustainable and capable of delivering early housing supply

1.4.6. Individually, each of the three spatial options identified in the Regulation 18 consultation has clear limitations. A more effective and deliverable strategy would combine their positive elements: focusing growth towards the main towns and sustainable transport corridors, while also enabling proportionate expansion at smaller, well-connected settlements. This hybrid approach would diversify the land supply, provide greater resilience against delivery risks, and ensure flexibility across the plan period.

1.4.7. The proposed allocation east of Davenham (NOR06) is well placed to contribute to such a strategy. The site represents a logical and defensible extension to the existing settlement, adjoining established residential areas and benefitting from excellent accessibility to the A556 corridor, nearby public transport routes, and wider strategic connections. Davenham also has access to a range of local services including shops, schools, and community facilities, with Northwich town centre providing higher-order services less than two miles away.

1.4.8. Allocating NOR06 would deliver a scale of development that is proportionate to the settlement and capable of supporting local services, improving housing choice, and strengthening sustainable transport connectivity. The site can come forward early in the plan period, supported by deliverable infrastructure and a clear trajectory. Importantly, development can be sensitively designed to respect the village's character and integrate high-quality green infrastructure, ensuring that growth enhances rather than detracts from local distinctiveness.

- 1.4.9. From a strategic perspective, the allocation of NOR06 complements larger urban extensions by providing a steady, deliverable supply of homes in a location with strong sustainability credentials. Its inclusion reduces reliance on a small number of major sites, enhances flexibility, and strengthens the Council's ability to demonstrate a rolling five-year housing land supply. It also supports the delivery of infrastructure-led growth in line with national policy, with phased development ensuring that impacts on local services and highways can be managed effectively.
- 1.4.10. In preparing the new Local Plan, the Council should adopt a balanced hybrid strategy that combines significant growth in larger towns and along transport corridors with proportionate development in sustainable settlements such as Davenham. The NOR06 site provides a clear opportunity to deliver this vision, supporting housing needs in full, boosting local services, and contributing towards a plan that is positively prepared, justified, effective, and consistent with the National Planning Policy Framework.

2 DAVENHAM

2.1 BACKGROUND

- 2.1.1. Davenham comprises a large village of approximately 3,000 people and is located to the south of the larger settlement of Northwich.
- 2.1.2. Davenham includes a central core which provides a full range of facilities including shops, petrol station, post office, takeaways, restaurants and pubs. The village also includes sports clubs, a primary school and places of worship.
- 2.1.3. There are also several bus routes which provide regular services to Northwich, Winsford, Sandbach and Crewe. The town of Northwich is located on the opposite side of the A556 and provides an even greater range of facilities including access to rail services to major cities.

2.2 POLICY APPROACH TO NORTHWHICH AND DAVENHAM

- 2.2.1. Policy STRAT 5 of the Local Plan Part One identifies, for the purposes of plan-making, that Davenham is defined as comprising part of the town of Northwich, along with Anderton, Barnton, Hartford, Lostock Gralam, Lower Marston, Lower Wincham, Rudheath and Weaverham. Policy STRAT 2 confirms that Northwich comprises one of the four major settlements in the Borough where the majority of new development will be directed.
- 2.2.2. Policy STRAT 5 identifies that Northwich will provide a key focus for development in the east of the borough and will provide at least 4,300 new dwellings within the plan period up to 2030.
- 2.2.3. Policy STRAT 5 also confirms that the North Cheshire Green Belt runs along the northern edge of Northwich and that this is to be maintained. It is also identified that the character and individuality of the settlements that form the wider built-up area of Northwich is to be safeguarded.
- 2.2.4. Tesni acknowledges that Davenham is inextricably linked to the town of Northwich, and if the Local Plan is to be reviewed, they would support the continued inclusion of the outer lying settlements within the context of 'Wider Northwich'. Tesni would also support the continued focus of development around Northwich, and its identification as one of the four principal settlements in the Borough.

2.3 CONSTRAINTS AROUND NORTHWICH

- 2.3.1. It is evident from studying the adopted Policies Map that there are significant constraints present around Northwich and the surrounding villages. These have been indicated on the appended Constraints Plan and are summarised below.
- 2.3.2. As noted within Policy STRAT 5, the North Cheshire Green Belt is located to the north of the settlement and is tightly wrapped around the boundary of Northwich and several neighbouring villages including Weaverham, Hartford, Maston and Lostock Gralam. At present, Exceptional Circumstances have not been demonstrated to realign the Green Belt and Tesni would therefore support maintaining the Green Belt boundary in this location. This is particularly the case given that there are likely to be sustainable locations for new development outside of the Green Belt to the south of Northwich.
- 2.3.3. There are also environmental constraints to development in this location. These include the presence of the River Weaver and the River Dane which meet in the centre of Northwich. To the south of the settlement, the two rivers flow within relatively steep sided valleys which present constraints in regard to flooding and landscape impact.
- 2.3.4. Policy GBC 3 of the Local Plan Part Two identifies several Key Strategic Gaps in this location, several of which acknowledge the importance of the keeping villages separate, as well as the presence of the Dane Valley. Davenham is particularly impacted by these settlement gaps, with three identified to the north, northeast and west of the village. The aim of this policy is to safeguard the character and individuality of the settlements that form the wider built up area of Northwich.
- 2.3.5. Policy DM 32 and paragraph 13.36 highlights the issue of instability of land across mid-Cheshire, particularly around Northwich and Marston. This is largely due to historic rock salt mining and brine extraction and means that areas may be at risk of subsidence. Tesni are of the view that this matter should be a major consideration in the identification of sites around Northwich. It is also the case that there are large areas of contaminated land, some of which are currently in use, on the outskirts of Northwich. Tesni is of the view that the viability of delivering for housing should be investigated thoroughly prior to identifying housing allocations in these areas.

2.4 LAND EAST OF LONDON ROAD, DAVENHAM

- 2.4.1. This section outlines the land within our client's control and confirms that the site represents a sustainable and suitable location for residential development. The site was previously considered within the HELAA (2017) and assessed as suitable, available, and achievable.
- 2.4.2. The site extends to approximately 3 hectares (7.4 acres) of level land, immediately adjoining the settlement boundary, as shown on the Considerations Plan (Image One). It lies to the rear of properties fronting London Road and south of housing accessed via Church Street. To the south sits Davenham Hall Nursing Home, a Grade II* Listed Building, with its driveway forming the southern boundary of the site.
- 2.4.3. The land benefits from a frontage of around 35m onto London Road, from which vehicular access can be achieved. While trees line this frontage, access can be delivered with the retention of most higher-quality specimens. A footpath already runs along the site frontage, providing safe pedestrian links to village amenities.
- 2.4.4. The site lies within the Davenham Conservation Area, which covers the village core and the surroundings of Davenham Hall. Although CW&C has not published a written appraisal, the Davenham and Whatcroft Neighbourhood Plan (para 5.3.1) notes:
- “b. The conservation area around the setting of Davenham Hall is principally meadow interspersed with mature trees that surround the historic building. The area is designated open countryside and is bounded naturally by Davenham Village to the north and west and the bypass to the east. The natural beauty of this area is valued by the local community and is further protected through an Article 4 Direction (Town and Country Planning (General Permitted Development) Order 1995) to remove permitted agricultural rights.”*
- 2.4.5. A nearby development to the north, also within the Conservation Area, delivered 20 new dwellings and was approved on appeal. The Inspector found that replacing a frontage Leylandii hedge with street-facing dwellings improved the character of the Conservation Area. The scheme was considered to have no harmful effect on Davenham Hall or its parkland, retained key mature trees, and provided an overall environmental benefit through landscaping.
- 2.4.6. A Concept Plan (Image Two) has been prepared for the site, reflecting these principles and demonstrating how development can be delivered while respecting the Conservation Area's heritage value.



Image Two: Concept Plan (Ref: P21_079_005; Carter Jonas, 2021)

2.4.7. The site falls entirely within Flood Zone 1 and has no other known constraints that would preclude its development.

2.4.8. A major benefit of the scheme is the delivery of affordable housing. The provision of up to 40–45 homes, with 30% affordable, would make a valuable social contribution by supporting a strong, vibrant, and healthy community.

2.4.9. Tesni is committed to working with local stakeholders to ensure the scheme responds to village needs and helps deliver appropriate community facilities.

2.5 SUMMARY

2.5.1. There are significant benefits associated with the proposal including the delivery of market and affordable housing. Tesni are keen to engage with stakeholders in the local community to

understand how the development may best support the needs of the village and provide facilities which are potentially in demand.

- 2.5.2. The promoted site comprises 3 hectares of land adjoining the settlement boundary of Davenham. It has been previously identified as suitable, available, and achievable for residential development.
- 2.5.3. The land has no significant constraints, lying within Flood Zone 1, and offers capacity for 40–45 new homes, including 30% affordable housing. Tesni intends to work with the local community to ensure the development supports local needs and contributes positively to the village.

3 CONCLUSIONS

- 3.1.1. The Council's housing requirement should be set above the Standard Method baseline of 1,914 dwellings per annum, to properly reflect economic growth ambitions, address affordability pressures, and ensure resilience in delivery.
- 3.1.2. None of the three spatial options is sufficient on its own. A hybrid strategy that combines elements of each approach, while also distributing growth to smaller sustainable settlements, will provide greater flexibility and robustness.
- 3.1.3. Over-reliance on large, strategic Green Belt releases risks slow delivery and housing land supply vulnerability. Smaller sites in other settlements can come forward quickly and help to maintain a rolling five-year supply.
- 3.1.4. Davenham is well placed to accommodate the proposed level of growth, supporting local services, broadening housing choice, and contributing to the borough's overall housing trajectory. As a consequence, Tesni is supportive of the Council's proposal to put forward this location as a draft allocation.
- 3.1.5. By ensuring a diverse supply of sites — large and small, urban and rural — the new Local Plan will be more positively prepared, justified, and effective, giving confidence at examination and providing certainty for local communities and developers alike.