

Representations to Cheshire West and Chester Local Plan: Issues and Options (Regulation 18) Consultation

Land at Holmes Chapel Road, east of
Middlewich

August 2025

Turley

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Executive Summary

1. This representation to the Cheshire West and Chester (“CWAC”) Local Plan: Issues and Options (Regulation 18) Consultation (“the I&Os Document”) has been prepared on behalf of Harworth Group Plc (“Harworth”).
2. This document provides representations on those issues, options and policy direction of the I&Os Document that are of most relevance to Harworth. Representations are provided in the following sections of this document, with reference to the most applicable Consultation Question from the Council’s survey for ease of reference.
3. Through these representations Harworth provides a response to the questions raised and raises a number of comments as to the policy approach currently being proposed by the Council on a number of areas. In particular, the suggested approach towards Middlewich, as set out in MI 'Middlewich' given their land interests at Holmes Chapel Road, east of Middlewich.
4. Harworth is of the view that CWAC must positively plan for the long term growth of Middlewich within its boundary in order to sustain the Key Service Centres’ long-term growth. This would be achieved by the emerging Local Plan recognising that:
 - The housing and employment needs of Middlewich are likely, in the very least, to be the same order of, magnitude as were set out in the current Cheshire East Local Plan Strategy
 - This development need is unlikely to be met wholly on land within Cheshire East (CE) due to the opportunity for growth of Middlewich being severely constrained.
 - The policy approach for Middlewich, within the emerging CWAC Local Plan, must be framed in the context of the cross-boundary relationship between CWAC and CE and recognise the shared functional role of Middlewich and proactively identify opportunities to accommodate growth within its boundary.
 - Land to the east of Middlewich (in CWAC’s administrative boundary) has a fundamental role to play in planning for the delivering long-term growth of the Key Service Centre, and presents a significant strategic opportunity for both authorities to plan positively to meet the needs of Middlewich in full.
5. A standalone representation to the consultation, and Strategic Opportunities Brochure has been submitted by Harworth in respect of land at Holmes Chapel Road, east of Middlewich. These documents demonstrate the suitability, availability, and achievability of land within Harworth’s control to the east of Middlewich at Holmes Chapel Road, east of Middlewich. Ultimately, this land represents a significant sustainable opportunity to deliver new development - particularly for employment land - at the strategic scale required to meet the town’s anticipated level of growth over the new plan period given its role as a Key Service Centre and its strategic position on the M6 corridor.

6. Harworth would welcome further discussions with the Council (and Cheshire East Council) regarding the overarching and site-specific representations at an appropriate stage.

1. Introduction

- 1.0 This representation to the Cheshire West and Chester (“CWAC”) Local Plan: Issues and Options (Regulation 18) Consultation (“the I&Os Document”) has been prepared on behalf of Harworth Group Plc (“Harworth”).
- 1.1 This document provides representations on those issues, options and policy direction of the I&Os Document that are of most relevance to Harworth. Representations are provided in the following sections of this document, with reference to the most applicable Consultation Question from the Council’s survey for ease of reference.

Harworth

- 1.2 Harworth Group plc is a leading UK-based land and property regeneration company, specialising in the redevelopment of land to create sustainable communities and thriving business environments. With approximately 15,000 acres across 100 sites in the North of England and the Midlands, Harworth focuses on transforming former industrial, brownfield, and underutilised sites into vibrant residential, commercial, and industrial spaces.
- 1.3 Harworth is committed to delivering thousands of new homes and jobs, contributing to the economic growth of the regions it serves. Their expertise in sustainable development ensures that these places are designed with long-term environmental and community benefits in mind.

Overview of Representations

- 1.4 Whilst the Harworth welcomes and supports the progression of the draft Local Plan, these representations raise a number of points for consideration about the content of the I&Os Document policy approaches.
- 1.5 Harworth hopes that these comments will be considered by the CWAC in the development of the next stage of the emerging Local Plan.
- 1.6 Harworth has also submitted a standalone representation to the consultation which promotes land at Holmes Chapel Road, east of Middlewich for a specific allocation for employment and residential development in the new CWAC Local Plan.
- 1.7 Harworth would welcome further discussions with the Council (and Cheshire East Council) regarding the overarching and site-specific representations at an appropriate stage.

2. Overall Approach to the Draft Local Plan

Planning Reform

- 2.0 The preparation of the CWAC Local Plan comes at a critical time. Since the Government's election in July 2024, it has made clear that *"sustained economic growth is the only route to improving the prosperity of our country and the living standards of working people"*¹. It has stated that its 'central mission' is to 'restore economic growth' and it also aims to deliver the infrastructure that the country needs², *"including one and a half million homes over the next five years"*.
- 2.1 In line with these priorities, the Treasury has confirmed that: *"The government's housing targets, coupled with investment in supporting infrastructure, will remove barriers to economic growth"*³. The delivery of the mission to kickstart economic growth and *"rebuild Britain"* has been established through revisions to the NPPF in December 2024.
- 2.2 The revisions to the National Planning Policy Framework (NPPF) in December 2024 provide a policy framework to facilitate the Government's commitments to economic growth and to tackle the housing crisis. Alongside publication of the revised NPPF in December 2024, a revised standard method for calculating Local Housing Need (LHN) was also published.
- 2.3 This revised method ensures that housing needs are determined more accurately, taking into account factors such as population growth, household formation rates, and local housing market conditions. By aligning local housing targets with these updated calculations, the Government aims to meet its goal of delivering 300,000 new homes annually across the country. The revised NPPF now explicitly requires that Local Plans - such as CWAC's - accommodate at least the minimum number of homes needed to meet the calculated Local Housing Need (LHN). This ensures that housing development is not only sufficient but also strategically located to support sustainable growth.
- 2.4 With the objective of enabling economic growth, the revised NPPF continues to align with the preceding version in setting a clear expectation that *'planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt'*.
- 2.5 For economy and employment development the revised NPPF introduces a direct expectation that regard be given to the national Industrial Strategy in the development of planning policies⁴. It also expects policies to identify strategic sites for local and

¹ Proposed reforms to the National Planning Policy Framework and other changes to the planning system (MHCLG, August 2024)

² Speeches by the Chancellor, The Rt Hon Rachel Reeves MP, on 5/8 July 2024

³ 10 Year Infrastructure Strategy Working Paper – A Cross-Government Plan for Infrastructure, page 1 (HM Treasury, January 2025)

⁴ Paragraph 86 (a) of the 2024 NPPF

inward investment to match the strategy and to meet anticipated needs over the plan period⁵.

- 2.6 The revised NPPF also adds a direct reference to the ‘*modern economy*’ reflecting the Industrial Strategy, requiring planning policies to “...*pay particular regard to facilitating development to meet the needs of a modern economy, including by identifying suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, freight and logistics*”.
- 2.7 It also adds further clarification on the expectations of planning policies and decisions to ‘*recognise and address the specific locational requirements of different sectors*’, including storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation

Devolution

- 2.8 The new Labour Government has made clear its commitment to planning reform which includes a particular focus on strategic planning across local authority boundaries and further devolution to the regions. The Government has established the clear objective of having universal coverage of strategic plans during this Parliament⁶.
- 2.9 Cheshire and Warrington are currently undergoing a devolution process, which has been confirmed as part of the Government’s devolution priority programme. The three local authorities of CWAC, Cheshire East and Warrington are working together to establish a Mayoral Combined Authority, and a consultation⁷ seeking views on the proposal closed on 13 April 2025. The Mayoral Combined Authority for Cheshire and Warrington is expected to be established in time for the first mayoral election to take place in May 2027, subject to the Secretary of State deciding to proceed following review of the consultation responses, the government confirming funding and the necessary legislation being laid in Parliament.
- 2.10 If established, the Combined Authority would have a duty to produce a Spatial Development Strategy (SDS) for the Cheshire and Warrington area. This would likely overlap and replace (at least in part) any Local Plans which are in preparation or adopted by the three constituent authorities at that time (including the emerging CWAC Local Plan). It is acknowledged that a SDS will take several years to produce and therefore it is imperative that CWAC (alongside Cheshire East and Warrington) progress up-to-date Local Plans in place as soon as possible, in order to meet local needs. This is recognised at paragraph 1.10 of the I&Os Document.

⁵ Paragraph 86(b) introduces the following change from the 2023 iteration: *set criteria, and identify strategic sites...*

⁶ English Devolution White Paper: Power and partnership: Foundations for growth (MHCLG, 16 December 2024)

⁷ Cheshire and Warrington devolution consultation (MHCLG, February 2025)

3. Draft Local Plan Introduction (Chapter 1)

Evidence Base

Question IN 1

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

- 3.0 The I&Os Document confirms that CWAC intend to prepare additional evidence to support the emerging Local Plan, including a Housing Needs Assessment, Green Belt Study, Infrastructure Delivery Plan, Strategic Viability Assessment and Land Availability Assessment.
- 3.1 Paragraph 32 of the NPPF requires that the preparation of all policies should be underpinned by relevant and up-to-date evidence which is adequate and proportionate to justifying policies.
- 3.2 Harworth's view is that it is crucial that the Council ensures that the preparation of the emerging Local Plan, and associated planning policy is justified through robust up-to-date evidence. Accordingly, Harworth is of the view that the following additional evidence should be produced or updated to substantiate and justified policy proposals of the emerging Local Plan:
- Site Selection Paper (to understand the methodology used to assess sites for allocation in the emerging new Local Plan);
 - Places Background Paper (to understand the unique characteristics of a place, identify opportunities and challenges, and inform strategic decisions about land use and development);
 - A robust assessment of economic needs (including for a range of manufacturing and warehouse space);
 - Up-to date evidence of the availability of housing and employment land supply across the borough (to ensure that the plan is based on a robust understanding of local needs and can effectively address those needs through appropriate land use allocations and policies);
 - Brownfield Land Register (to identify previously developed land that is potentially suitable for housing development within CWAC);
 - Playing Pitch Strategy (to inform planning decisions and ensure adequate provision of sports facilities);
 - Public Open Space Assessment (to ensure adequate provision of green spaces); and,
 - Duty to Cooperate Statement (to demonstrate how strategic cross boundary matters have been dealt with through the preparation of a Local Plan).

Monitoring

Question IN 2

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

- 3.3 Harworth believes that the emerging Local Plan should include a well-defined, coherent, and robust monitoring framework. Through this framework CWAC should establish clear monitoring indicators for relevant policies to ensure and measure where or not the respective objectives and targets are being achieved. In the event that any policy objectives or targets are not being met, it is paramount that the framework is used to specify the reasons, outline the corrective actions to be taken, and establish an appropriate timeframe for addressing targets or objective failures. The framework should also specify the data sources to be used, and the reporting methods employed, and frequency of reporting.
- 3.4 Amongst other things, the framework should ensure the frequent monitoring of housing and employment delivery against the policy requirements of the emerging Local Plan.
- 3.5 The effective monitoring of housing delivery is critical to identify delays to housing delivery across CWAC and to take action to address under delivery as soon as possible. The Council will need to monitor the delivery of housing and publish progress against a published Housing Trajectory. Housing monitoring should be undertaken on a site-by-site basis.
- 3.6 Likewise, the monitoring of employment delivery is paramount to quickly address any delays in the development of employment land and the impacts on employment generation and associated benefits across CWAC. The Council should track progress against a published Employment Trajectory, with monitoring conducted on a site-by-site basis. This approach will ensure clear updates on the development of employment sites and the creation of new job opportunities, enabling timely action if any issues arise.

Plan Period

Question IN 3

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

- 3.7 The I&Os Document confirms that CWAC Council intends to plan for a period of 15 years.
- 3.8 Paragraph 22 of the NPPF states that strategic policies should look ahead over a minimum 15-year period from adoption and that where larger scale developments form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.
- 3.9 In order to ensure a robust approach to the emerging Local Plan, reflecting the likely timescales for preparation and accounting for a 15-year plan period post-adoption in line with the NPPF (paragraph 22), Harworth considers that the Council should, as a

minimum, be looking to prepare a new Local Plan that will look forward to at least 2045 to enable a 15-year plan period post-adoption. It is important to note in this regard that the adopted Local Plan applied a 20-year plan period. It may also be necessary for the Council to consider whether the scale of housing and employment need, and the strategic sites identified to meet this need, require the emerging Local Plan to extend over a longer period.

4. Vision (Chapter 2)

V1 Vision

Question VI 1

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

- 4.0 In accordance with paragraph 15 of the NPPF, Local Plans should provide a positive vision for the future of each area. Harworth considers that the emerging Local Plan should establish an ambitious yet realistic vision for the future of CWAC, explaining how the Council wishes to see the area grow and evolve up to the end of the Plan period.
- 4.1 A central aspect of this vision must be a clear commitment to meeting the current and future housing needs of CWAC. While the current draft vision highlights general sustainability, it does not adequately identify the need to address and deliver the diverse housing needs of the Borough. These needs should include a mix of market housing, family homes, affordable housing, homes for older people, and homes for first-time buyers. This will ensure that the area provides homes for all stages of life and supports the Borough's long-term demographic and economic growth.
- 4.2 Similarly, the vision should reflect a strong commitment to fostering economic growth throughout CWAC. Paragraph 81 of the NPPF stresses the importance of supporting sustainable economic growth, which is essential for building a competitive and resilient local economy. The vision should clearly outline how the Local Plan will contribute to strengthening the local economy, creating employment opportunities, supporting local businesses, and attracting investment.

Question VI 2

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

- 4.3 Harworth recognises that the proposed vision for CWAC correctly highlights essential principles, such as addressing climate change, enhancing wellbeing, ensuring adequate infrastructure, and safeguarding the character of the area. However, we believe that the vision would be strengthened by more explicitly incorporating a clear focus on meeting the housing and employment needs of the Borough.

Question VI 3

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

- 4.4 Yes, Harworth supports the proposed approach to establishing specific visions for key places within the Borough, provided that these visions align with the overall Spatial Strategy and Settlement Hierarchy.
- 4.5 However, the vision as presented in VI 1 fails to identify Middlewich as one of the places with an individual vision. It is noted that the six other places (Chester, Ellesmere

Port, Northwich, Winsford, Frodsham, and Neston and Parkgate) are specifically identified, and are subject to place based chapters with the I&Os document.

- 4.6 Chapter 12 recognises that the immediate relationship of Middlewich with CWAC, emphasising the need for continued close working and collaboration with Cheshire East Council (CEC) in relation to its future development needs and infrastructure, and seeks to take a pragmatic approach to avoid delays enabling land in CWAC to meet the future needs of Middlewich. It also recognises the concentration of existing and committed developments and infrastructure to the east of Middlewich, including Cheshire Fresh, Midpoint 18, Brooks Lane train station, and the Middlewich Eastern Bypass (“MEB”).
- 4.7 Harworth is of the view that the future plan will need to play an important and positive role in meeting the development needs of Middlewich, and as such, Middlewich should have an individual and detailed vision with the emerging Local Plan – beyond merely the identification of a co-operative role with Cheshire East.
- 4.8 In accordance with Paragraph 24 of the NPPF this approach will ensure the effective strategic planning across the local planning authorities’ boundaries and will play a vital and increasing role in how sustainable growth is delivered in and around Middlewich, by addressing key spatial issues including meeting housing needs, delivering strategic infrastructure and building economic and climate resilience.
- 4.9 Harworth’s considered views on the role of Middlewich are provided within Section 7 of this response.

5. Objectives (Chapter 3)

OB1 Objectives

Question OB 1

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

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

- 5.0 Harworth considers that whilst the Council may take inspiration from the objectives of the current Local Plan and the Sustainability Appraisal. However, objectives need to be specific to the emerging Local Plan and based on responding positively to national planning policy to grapple with the housing crisis and fostering economic growth and reflective of up-to-date evidence to respond to the specific issues and challenges facing CWAC. This will ensure that the emerging Local Plan objectives support the realisation of the vision. Harworth would seek some further evidence around the approach to the Options once further developed.

Question OB 2

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

- 5.1 N/A

Option A – Take forward the current Local Plan objectives

Question OB 3

Do you feel that the option of taking forward the current Local Plan objectives into the new Local Plan, as set out in [Option A 'Take forward the current Local Plan objectives'](#) above, is an appropriate approach?

- 5.2 Please refer to response to Question OB 1.

Question OB 4

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

- 5.3 Harworth agrees that these objectives are inconsistent with national planning policy and would need to be amended or removed if the Council opted to pursue Option A to establish the objectives for the emerging Local Plan. For example, SO3 and SO9 of the current Local Plan may not reflect the chosen spatial strategy for the emerging Local Plan and thus would be rendered redundant. Likewise, SO10 does not account for the potential need to amend the defined Green Belt boundaries to meet the authorities housing and employment requirements.

Option B – Use the Sustainability Appraisal objectives

Question OB 5

Do you feel that the option of using the Sustainability Appraisal objectives in the new Local Plan, as set out in [Option B 'Use the Sustainability Appraisal objectives'](#) above, is an appropriate approach?

5.4 Please refer to response to Question OB 1.

Question OB 6

If you do not feel this is an appropriate approach, are there any changes that you could suggest?

5.5 Please refer to response to Question OB 1.

6. Spatial Strategy (Chapter 5)

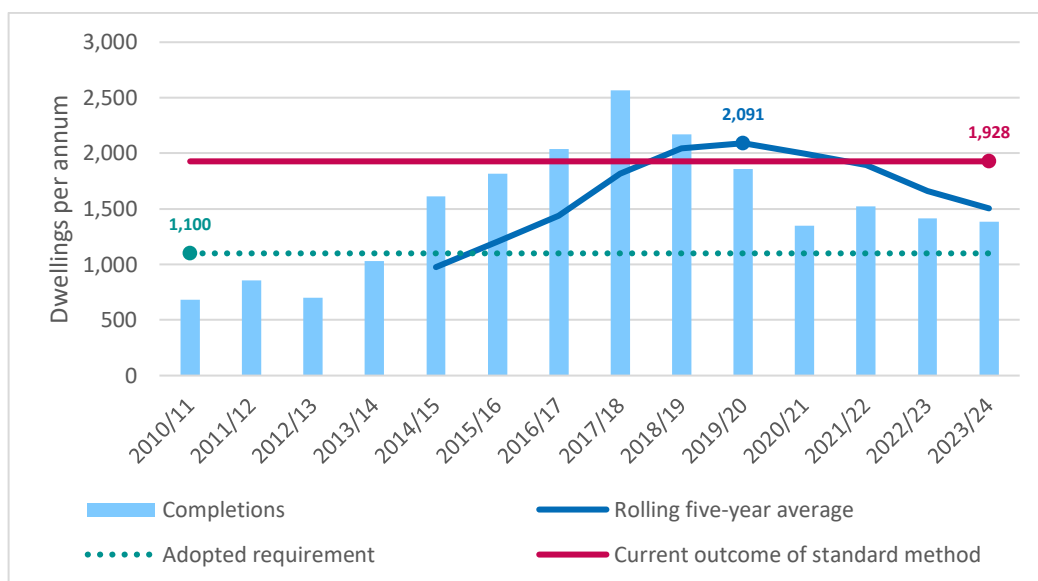
SS 1 Housing Needs

Question SS 1

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

- 6.0 Harworth acknowledges the recent update in the Government’s dwelling stock figures, which now sets the housing need for CWAC at a minimum of 1,928 dwellings per annum. This represents an increase of 14 dwellings per year, totalling 28,920 dwellings over a 15-year plan period. The Council is advised to keep the precise figure under review, as further affordability and housing stock data will become available before the Regulation 19 consultation scheduled for autumn 2026.
- 6.1 The outcome of the method is currently some **75% higher** than the existing housing requirement, adopted in Part One of the current Local Plan. While this has been comfortably surpassed during the plan period to date, it would still require a 29% boost in delivery, albeit not to unprecedented levels as up to 8% more homes have been consistently completed within five-year periods therein.

Figure 6.1: Benchmarking current outcome of standard method for CWAC



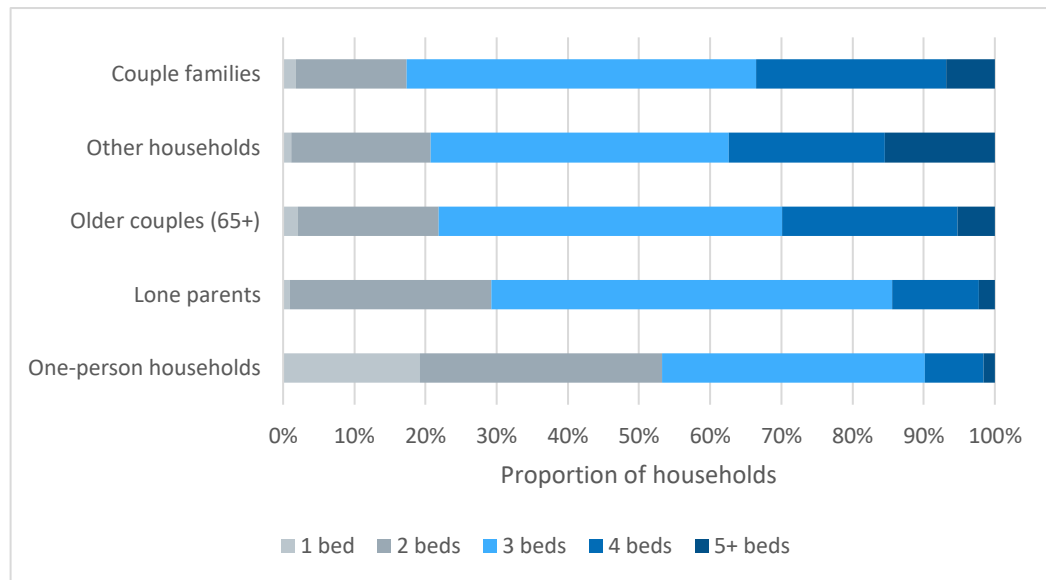
Source: Council monitoring; Turley analysis

- 6.2 In accordance with the NPPF, the standard method for assessing local housing need in England and the July 2024 Written Ministerial Statement – “Building the Homes we need” – this is the minimum housing need figure that should be considered in preparing the emerging Local Plan. Paragraph 69 of the NPPF recognises that the Council may also need to consider if it is appropriate to plan for a higher housing need

figure than the standard method indicates to reflect growth ambitions linked to economic development or infrastructure investment. It is recommended that this forms part of the scope for the Housing Needs Assessment (HNA) that is seemingly “to be prepared”.

6.3 Harworth believes that this evidence must be robust and comprehensive so as to ensure that the Local Plan effectively meets the housing needs of the Borough. It should use evidence from the 2021 Census to consider the type and size of housing required, acknowledging that in CWAC all but individuals living alone generally favour larger homes, with at least three bedrooms. Over a third of couples and unrelated adults – captured in the “other households” category shown below – have at least four bedrooms, with a number even having at least five.

Figure 6.2: Number of bedrooms by household type in CWAC (2021)



Source: Census 2021

6.4 Compared to the equivalent findings from the 2011 Census, the tendency to live in larger housing in CWAC has notably risen amongst virtually all groups, with lone parents being the only exception. It will clearly be important for any HNA to acknowledge and account for this trend, so that the Local Plan can respond by setting realistic expectations around mix and allocating suitable sites.

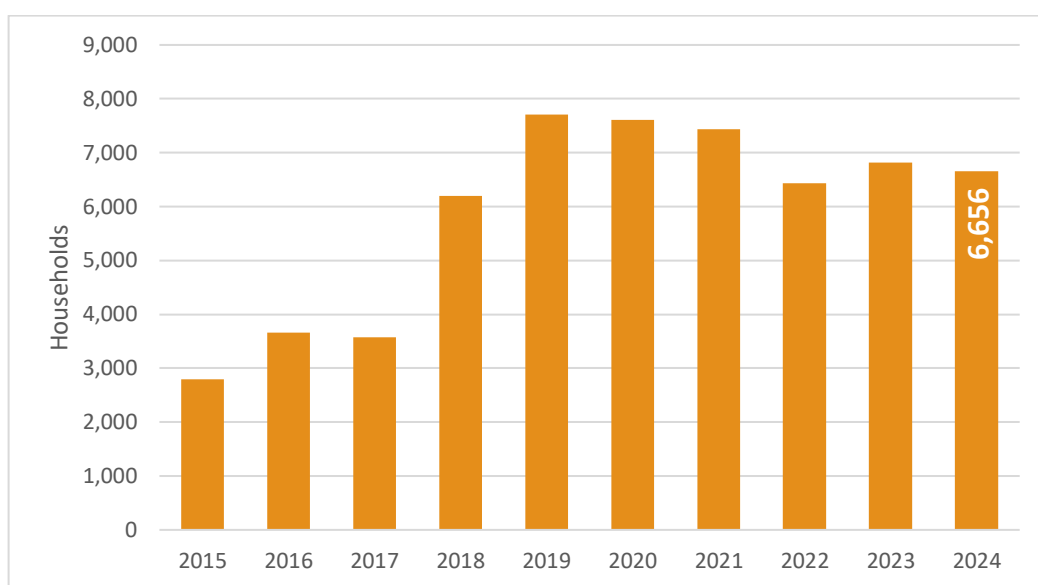
Table 6.1: Change in tendency to occupy larger housing in CWAC (2011-21)

	3+ beds		4+ beds		5+ beds	
	2011	2021	2011	2021	2011	2021
Couple families	82%	83%	32%	34%	7%	7%
Other households	76%	79%	33%	37%	13%	16%
Older couples (65+)	74%	78%	22%	30%	4%	5%

	3+ beds		4+ beds		5+ beds	
	2011	2021	2011	2021	2011	2021
Lone parents	71%	71%	15%	14%	3%	2%

6.5 The HNA should also consider the need for affordable housing, to replace what is believed to remain the latest such assessment completed over twelve years ago⁸. This should aim to tackle a persistently long waiting list, on which some 6,656 households were registered as of March 2024⁹.

Figure 6.3: Households on the waiting list in CWAC (2015-24)



Source: MHCLG

- 6.6 A viability assessment should also be conducted to determine what types of homes are financially deliverable in CWAC, particularly regarding the provision of affordable homes and other housing demands. Both this and the HNA should be made available for future consultation to ensure transparency and allow stakeholders to provide input on how the housing needs of the Borough can be best addressed.
- 6.7 The emerging Local Plan must also ensure that there is a sufficient supply of deliverable and developable land to both meet CWAC’s housing requirement and deliver the types of homes needed. This will not only help deliver the necessary homes each year but also ensure that the Council maintains a 5-year housing land supply and meets the Housing Delivery Test. Additionally, Harworth strongly recommends that the Local Plan allocates more sites than the minimum required to meet the housing target, creating a buffer to address any potential under-delivery from certain sites and to provide flexibility within the housing market. This approach would align with the NPPF’s

⁸ Cheshire West and Chester 2013 Strategic Housing Market Assessment (Arc4)

⁹ Table 600: number of households on local authority housing registers (waiting lists) by district, England, from 1987 (MHCLG)

requirement for the Local Plan to be positively prepared and would help ensure flexibility, choice, and resilience in the housing market.

- 6.8 In summary, Harworth recognises the need for the Local Plan to plan for a minimum of 1,928 new homes per year, as this complies with the NPPF and reflects the updated housing need. However, Harworth is of the view that this should be kept under review given that underlying datasets will be updated again before the next consultation. To ensure the plan's success, we recommend comprehensive evidence gathering on housing needs and viability, along with the allocation of additional sites to provide flexibility in meeting housing needs and addressing any future shortfalls. This approach will support the long-term development of CWAC, meeting housing demands while supporting economic growth and sustainable development.

Question SS 2

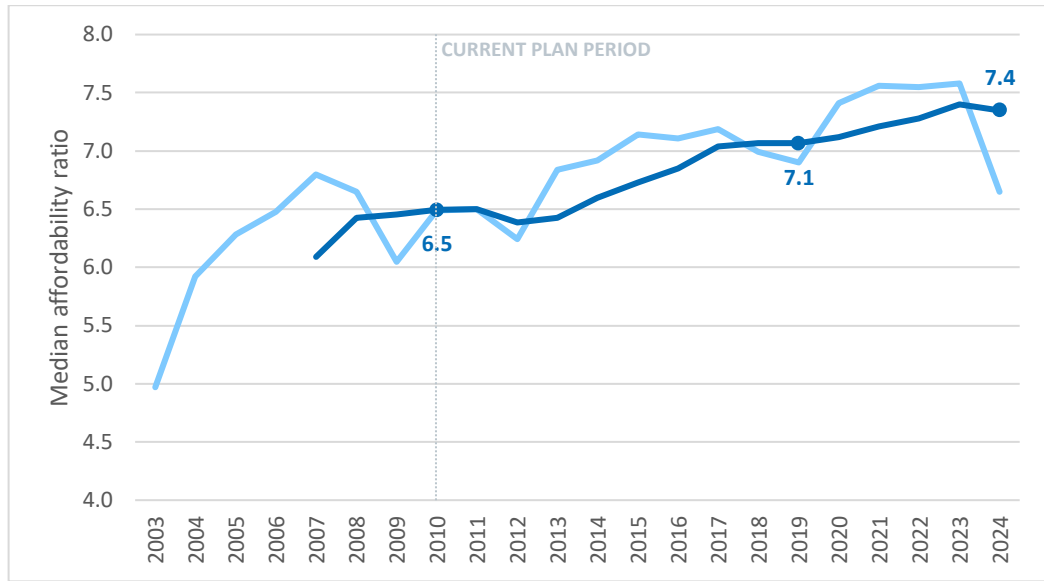
Do you think the Council should consider a stepped housing requirement that plans for a lower level of housing delivery earlier in the plan period?

- 6.9 At this stage of the plan preparation and in the absence of a confirmed Spatial Strategy (including the scale of individual site allocations), Harworth does not believe that the Council should consider a stepped housing requirement.
- 6.10 While a stepped approach may be appropriate in certain circumstances, we argue that it could potentially delay the delivery of housing later in the plan period, by which point the failure to fully meet housing needs in the interim is likely to have brought adverse consequences. Housing affordability, relative to median earnings, has worsened over the current plan period even with an average of 1,500 homes having been provided annually¹⁰. There are already signs that slowing delivery since the peak of 2019 – shown at the earlier Figure 6.1 – has had an adverse impact on affordability, when calculating a rolling five-year average to smooth what the Government itself acknowledges as volatility year-to-year¹¹.

¹⁰ House price to workplace-based earnings ratio (ONS, March 2025)

¹¹ Government response to the proposed reforms to the National Planning Policy Framework and other changes to the planning system consultation (February 2025)

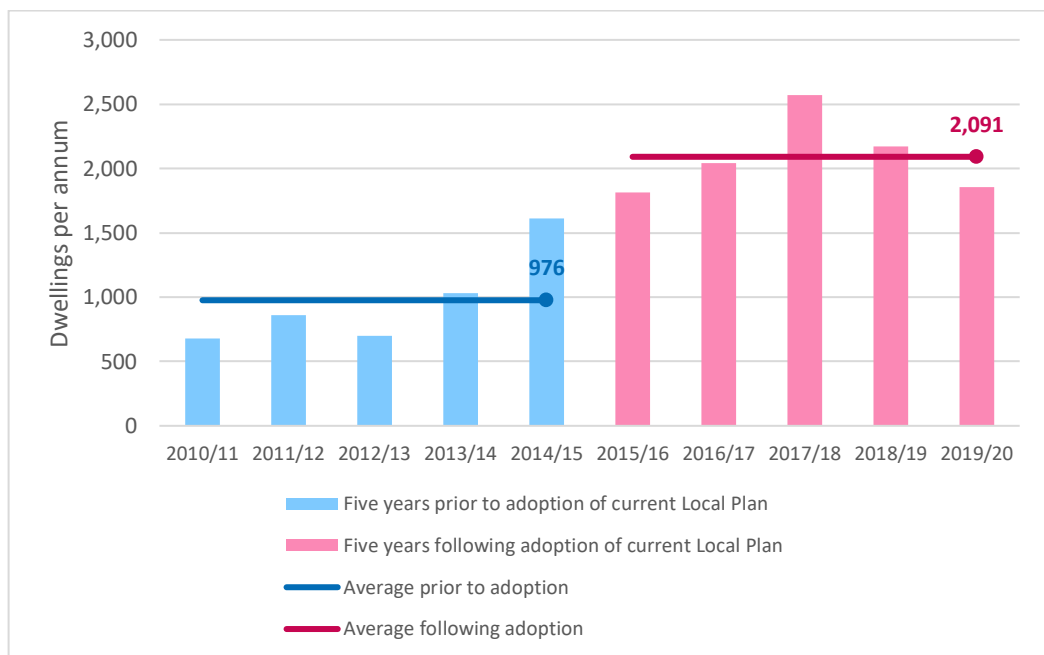
Figure 6.3: Affordability of housing in CWAC (2003-24)



Source: ONS

- 6.11 To avoid making the situation worse, Harworth strongly recommends that the Council plans to meet the annual housing requirement of 1,928 dwellings from the outset, ensuring that housing delivery is spread consistently throughout the plan period.
- 6.12 By committing to the full housing need from the outset, the Council can generate momentum in housing development, in a similar way to how the adoption of the current Local Plan in January 2015 helped to more than double housing delivery over the subsequent five years, compared to the prior five.

Figure 6.4: Homes delivered prior to and following adoption of current Local Plan



Source: Council monitoring; Turley analysis

- 6.13 Such a commitment would also support economic growth and ensure that the required infrastructure is in place to accommodate new development. This approach better aligns with the principles of the NPPF, which emphasises the need for local plans to be positively prepared and ensure that sufficient land is available to meet housing needs.

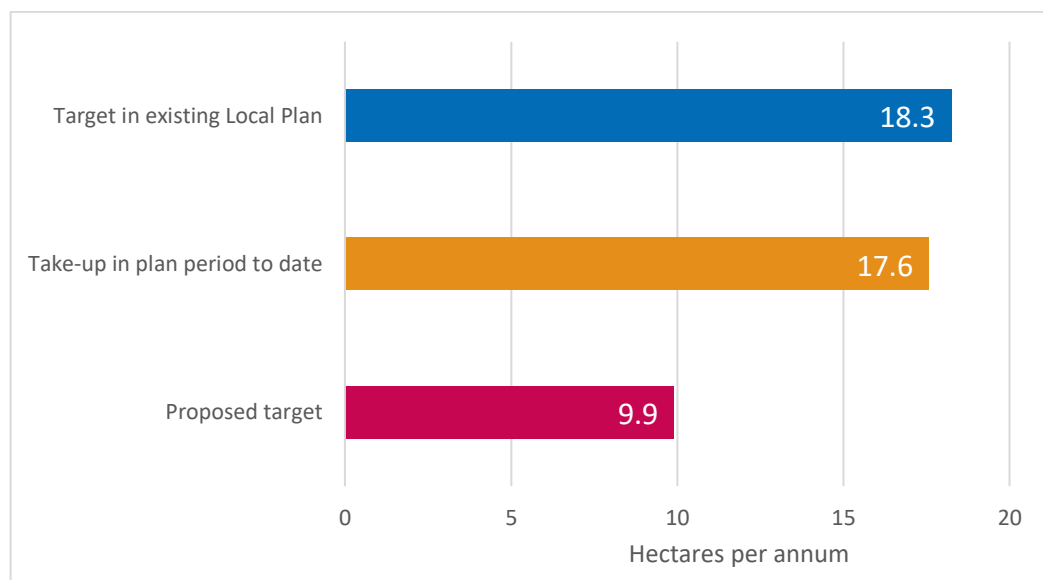
SS 2 Employment Needs

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?

- 6.14 While acknowledged to only be a minimum, Harworth is concerned that a target of 9.9 hectares per annum – or 198 hectares overall – would be substantially lower than the equivalent target of the existing Local Plan where Policy STRAT 2 sought to deliver at least 365 hectares of employment land over a comparable period of twenty years, this being some 84% higher at an average of 18.3 hectares per annum. Downgrading this target to the level proposed would be particularly surprising where some 17.6 hectares has reportedly been taken up annually over the plan period to date, giving assurance that the current target is broadly reflective of expressed demand over recent years¹². The comparative strength of this demand is equally acknowledged in the Economic Development Needs Assessment (EDNA) where it recognises that the Cheshire market for industrial and warehouse premises ‘ranks in the top half of CoStar’s 54 industrial markets across the UK. It is one of the most expensive industrial markets outside London and the South East.’¹³

Figure 6.5: Benchmarking proposed employment land target



¹² Cheshire West and Chester Economic Development Needs Assessment (March 2025) paragraph 8.20

¹³ *Ibid*, paragraph 5.40

Source: Turley analysis

- 6.15 The disparity between recent take-up and the proposed target is even more surprising where the intention is believed to have been for the latter to be largely based on the former. The EDNA that recommended the proposed target uses different approaches for offices and industrial land, but it is the latter that generates most (98%) of the reported need with the study suggesting that this has been “*based on the past take up of floorspace, adjusted for a limited number of developments which are not expected to be repeated*”¹⁴.
- 6.16 Harworth remains to be convinced that it is necessary to remove schemes when extrapolating the past trend, since there is always a prospect of comparable developments coming forwards even if – as here – those responsible for the specific investments have no plans for further expansion themselves¹⁵. That said, the removal of three supposedly exceptional developments does not explain the clear disconnect between past take-up and the proposed target, as it moderates the past trend by only 13% when the proposed target is some 44% lower¹⁶.
- 6.17 It also cannot be explained by differences in the respective trend periods, as both appear to have been based on take-up over the period from 2010 to 2024¹⁷.
- 6.18 If the Council persists with the proposed target, even as an absolute minimum, there must be a clear explanation as to why it is so much lower than the recent trend on which it supposedly based. There is otherwise a significant risk that the future need for employment land in CWAC will be underestimated, potentially obscuring a need to identify additional sites where it could be claimed that the existing supply of employment sites – capturing permissions plus existing allocations – would be sufficient to meet the implied need, at least in a basic quantitative sense¹⁸.

¹⁴ *Ibid*, paragraph 8.64

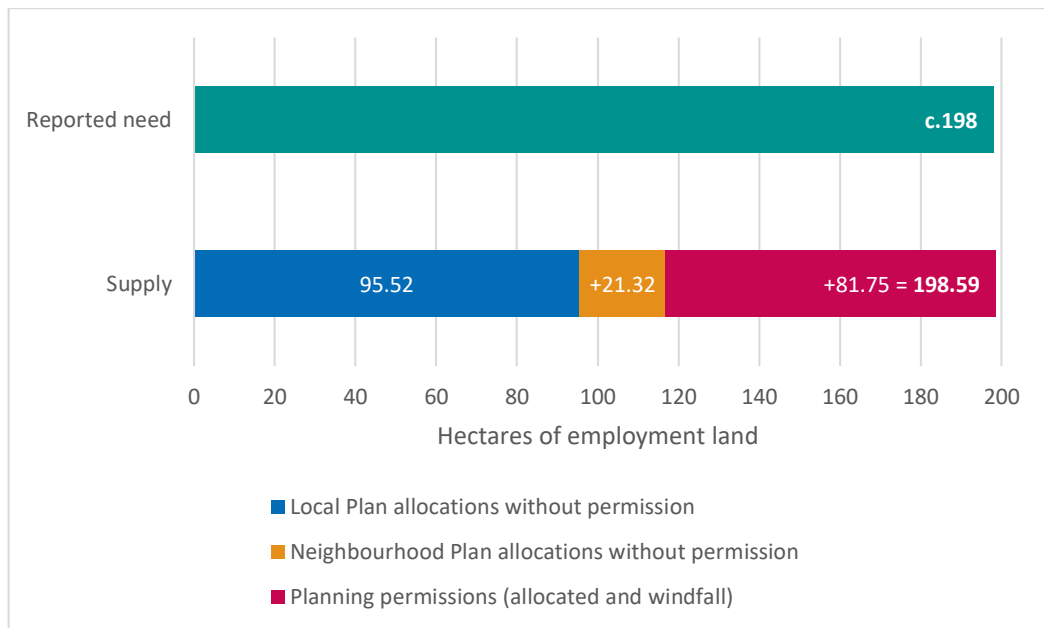
¹⁵ *Ibid*, Table 8.9

¹⁶ *Ibid*, Table 8.8 and Table 8.10

¹⁷ *Ibid*, paragraph 8.20 and Table 8.10

¹⁸ Land Availability Assessment Stage One (2025) Table 4.18

Figure 6.6: Existing employment land supply vs. proposed target



Source: CWAC Council; Turley analysis

6.19 The Council is also encouraged to consider qualitative factors, so as to ensure that its proposed employment sites are of the requisite size and in suitable locations. This is highlighted in the EDNA which recommends that: ‘Large scale inward investment sites [defined as larger sites of at least 5 ha for the extension of existing large sites, and a minimum of 10 ha for new sites, but more frequently 25 ha and significantly above] should make up a minimum of 40% of the future total but it would be preferable for this to be closer to 60% reflecting trends towards large units for both inward investment and strategic distribution.’¹⁹

6.20 The published evidence does not appear to have reported the locations of the sites captured within its stated existing supply, but it is possible to calculate their average size given that the quantum of sites has also been specified. This indicates that the average site in the existing supply is only 2.5 hectares in size, with consents and Neighbourhood Plan allocations being smaller still (1.9ha) and even Local Plan allocations averaging only 3.8 hectares. While it is acknowledged that larger sites could feature in the supply, this does indicate a potential shortage of larger employment sites which could be rectified through new allocations.

Table 6.2: Average size of sites in existing employment land supply (April 2025)

	No.	Area (ha)	Average size (ha)
Local Plan allocations without permission	25	95.52	3.8

¹⁹ Cheshire West and Chester Economic Development Needs Assessment (March 2025) paragraph 1.4

	No.	Area (ha)	Average size (ha)
Neighbourhood Plan allocations without permission	11	21.32	1.9
Planning permissions (allocated and windfall)	42	81.75	1.9
Existing employment land supply	78	198.59	2.5

Source: CWAC Council

- 6.21 As referenced above, the location of proposed allocations must also be a key consideration. This recognises the locational requirements of occupiers, notably for industrial and warehouse premises where this constitutes most of the forecast demand. The EDNA is clear to stress in reflecting on analysis of CoStar market data that: *‘Cheshire (including East and West) is well connected by the M6, M62 and M56 motorways and is, as such, a key warehouse and distribution hub.’*²⁰ With regards the location of historic development (take-up) the EDNA affirms the importance of the strategic road corridors, observing that: *‘While the M62 and M56 corridor towns of Warrington, Widnes, and Ellesmere Port have seen the lion’s share of recent construction activity, further south Crewe and Middlewich have seen considerable big-box construction.’*²¹
- 6.22 The provision of additional ‘strategic’ employment sites on the strategic road network as part of the draft Plan’s provision for employment land must therefore be a key consideration. Where the EDNA recognises low vacancy and a concentration of deals in Winsford²², reflecting access to the M6 the identification of additional land benefiting from closer access to the motorway network around Middlewich must be positively planned for. This is explicitly recognised within the EDNA where in referencing rising demand for storage and distribution (B8) in Winsford reference is made to stakeholder insights identifying that *‘B8 uses may be better suited to Middlewich (Cheshire East) which is located closer to J18 of the M6.’*²³ In acknowledging the location of this demand it is critical that the Council ensures through the updating of its evidence base that full consideration is given to comparable evidence in CE with reference to the ongoing demand for employment land in Middlewich.

SS 3 Spatial Strategy Principles

Question SS 4

Do you agree with the suggested policy approach towards the spatial strategy principles, as set out in [SS 3 ‘Spatial strategy principles’](#) above? If not please suggest how it could be amended?

- 6.23 The Council’s proposed spatial strategy aims to direct new development primarily towards previously developed sites within established settlements. Should these sites fail to meet the identified development need, the strategy then proposes extending

²⁰ Cheshire West and Chester Economic Development Needs Assessment (March 2025) paragraph 5.36

²¹ *Ibid*, paragraph 5.39

²² *Ibid*, paragraphs 5.56 and 5.57

²³ *Ibid*, paragraph 6.35

development to the edge of existing settlements, prioritising locations with optimal access to public transport, existing services, and infrastructure. In certain circumstances, this may necessitate the release of Green Belt land.

- 6.24 While Harworth recognises the Council’s strategic approach of focusing first on brownfield sites and areas with existing infrastructure, the evidence demonstrates that this is insufficient to meet the identified development needs over the plan period. At present the Council’s housing land monitoring data evidence confirms that the borough has only 1.89 years of housing land supply against the calculated need under the standard method. This recognises that there is currently only a deliverable five-year housing land supply of 3,788 net dwellings. In total the same data identifies a total supply of 11,568 homes, the majority of which is made up of development plan sites and sites identified through the Brownfield Land Register and Land Availability Assessment. This supply evidently falls short of the minimum need of circa 29,000 homes over the future plan period referenced above.
- 6.25 Similarly, in the context of the planned provision for employment land as we identify in the response to SS3, whilst Harworth have concerns that the proposed provision for a minimum of 9.9 hectares of employment land each year presents a significant risk of under-estimating the full future need for employment land in CWAC it is apparent that new sites will be required to be identified to respond to occupier and locational requirements and demand. Specifically, this responds to the recommendation in the ENA that large scale investment sites (a minimum of 10 ha for new sites but more commonly 25 ha and above) make up a minimum of 40% of the total supply but preferably closer to 60%. It proceeds to recommend that in planning for the identified needs for industrial / warehousing that: *‘In reality this may mean a switch from PDL, available through the last plan period, to greater levels of greenfield provision.’*²⁴
- 6.26 As the demand for both housing and employment spaces increases, it will be crucial for the Local Plan to establish a spatial strategy that appropriately plans to accommodate the full spectrum of the borough’s development needs and in our view, appropriately plan to meet development needs of Middlewich. This recognises the current scale of the settlement and its recent growth as well as its unique locational attributes with strong access to the M6 and therefore the strategic road network.
- 6.27 Harworth is, therefore, of the view that the emerging Local Plan Spatial Strategy needs to adopt an approach that foster sustainable development through the identification of land and sites the edge of existing settlements, prioritising locations with optimal access to public transport, existing services, and infrastructure. Working with CEC, this will need to include Middlewich.
- 6.28 Paragraph 146 of the NPPF confirms that the exceptional circumstance to justify Green Belt release includes where an authority cannot meet its identified need for homes, commercial or other development through other means. Harworth is of the view that some level of Green Belt release will be required to meet the identified need to meet

²⁴ Cheshire West and Chester Economic Development Needs Assessment (March 2025) paragraph 1.4

the identified housing demand and to provide sufficient land for employment use in appropriate locations.

- 6.29 Through doing so Harworth recognises, to justify Green Belt release, the Council must provide robust evidence demonstrating that all other options for meeting housing and employment land needs have been exhausted. As such, we strongly support the need for an updated and comprehensive Green Belt Assessment, which should be aligned with the latest NPPF guidance.
- 6.30 The Council may also want to ensure that they consider sites that could be made sustainable, or may contribute to improving the sustainability of an existing settlement, as well as sites that are currently considered sustainable as part of their Land Availability Assessment.

SS 4 Settlement Hierarchy

Question SS 5

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

- 6.31 The emerging Local Plan should set out a logical settlement hierarchy which meets all of CWAC's housing needs and addresses all areas of the housing market, with a range of sites proposed for allocation.
- 6.32 The current spatial strategy in the adopted Local Plan distributes the majority of development to the larger settlements in the Borough of Chester, Ellesmere Port and Northwich. The I&Os Document proposes to add Winsford, Neston & Parkgate, and Frodsham to this list, with a smaller proportion of growth identified in Key Service Centres (to include Farndon and Malpas) and other Local Centres (to include Christleton) which have a level of facilities and services to meet the needs of residents and surrounding areas.
- 6.33 Harworth recognises that the settlement hierarchy should be the main focus for development.
- 6.34 However, the spatial strategy will need to also recognise and positively plan for the need to directly meet the development needs of Middlewich as the ability of CE to accommodate the scale of growth required to meet both the housing and employment needs of the town and fulfil its role in supporting economic growth and regeneration across Mid Cheshire is severely constrained (as demonstrated in Section 7 of this representation). Therefore, land adjacent to Middlewich, within CWAC, is strategically and sustainably located adjacent to the existing settlement and has a fundamental role to play in meeting the future development needs and infrastructure of the settlement.
- 6.35 Harworth also considers that there is a need to deliver higher levels of growth in the smaller settlements in the Borough, as well as in sustainable locations on the edge of existing settlements, prioritising locations with optimal access to public transport, existing services, and infrastructure. Whilst the spatial strategy in the adopted Local Plan only distributes a limited number of homes to these settlements. Harworth is of

the view that the emerging Local Plan should maximise the opportunity to facilitate sustainable development around other key settlements and as well as in strategically sustainable location. This approach would ensure that development is directed to support settlement vitality.

Question SS 6

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

6.36 Please refer to response to Question SS 5.

SS 5 Spatial Strategy Options

Question SS 9

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

6.37 Yes. There have been significant changes since adoption of the current Local Plan that would now justify Green Belt release; including planning reforms and updated national policy. This has been recognised by the Council in their decision to prepare a new Local Plan.

6.38 The emerging Local Plan should be cognisant of the significant change in circumstances and should adopt a spatial strategy that facilitates the release of Green Belt where the authority cannot meet its identified need for homes, commercial or other development through other means – as per the exceptional circumstances defined in Paragraph 146 of the NPPF.

Question SS 10

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

6.39 N/A

Question SS 11

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

- *Option A - Retain the Green Belt*
- *Option B - Follow current Local Plan level and distribution of development*
- *Option C - Sustainable transport corridors*
- *None of these*

6.40 Harworth notes that while the Council suggests each of the three growth options could accommodate at least 29,000 dwellings - potentially meeting the minimum housing needs over a 15-year period according to the standard method - further evidence is needed to substantiate whether this is realistically achievable.

- 6.41 Moreover, any of the growth options must also align with the Council’s commitment to delivering 149 hectares of employment land, as outlined in the Economic Needs Assessment. This figure is critical for ensuring that sufficient land is available to support job creation, economic development, and local businesses. However, the ability to meet both housing and employment land requirements within the chosen spatial strategy will depend on a more robust assessment of the land supply and infrastructure readiness across the Borough.
- 6.42 At this stage, Harworth does not deem it appropriate or feasible to determine which of the proposed spatial strategy options is most suitable, as further evidence is required to evidence that CWAC claim that all three options can meet the identified need is realistically achievable. This includes detailed studies into the availability of land for development, infrastructure capacity, and the suitability of different areas to support the anticipated growth.
- 6.43 Notwithstanding that, Harworth believes that any approach that does not involve a level of Green Belt release is unlikely to be appropriate. Such an approach is unlikely to adequately address local housing and employment needs within the Borough, and could result in an unsustainable spatial strategy.
- 6.44 Ultimately Harworth urges the Council to ensure that whichever spatial strategy is chosen provides sufficient housing and employment sites to meet the needs housing and employment needs for the borough and that of Middlewich.

Question SS 12

Do you have any alternative spatial strategy options that you would like to suggest?

- 6.45 N/A

Question SS 13

Aside from those settlements identified in the spatial strategy options, should new housing or other development be allowed in other settlements? If so, please specify what type of development? For example, infill etc?

- 6.46 Yes, development should be supported in all settlements to enable sustainable development and growth, meeting all local housing needs and addressing local employment needs. It should also support development in sustainable locations on the edge of existing settlements.

Option A – Retain the Green Belt

Question SS 14

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

- 6.47 Please refer to response to Question SS 11.

Question SS 15

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

6.48 Please refer to response to Question SS 11.

Option B – Follow current Local Plan level and distribution of development

Question SS 16

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

6.49 Please refer to response to Question SS 11.

Question SS 17

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

6.50 Please refer to response to Question SS 11.

Option C – Sustainable transport corridors

Question SS 18

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

6.51 Please refer to response to Question SS 11.

Question SS 19

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

6.52 Please refer to response to Question SS 11.

Potential growth areas

Question SS 20

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

6.53 Harworth considers that the Council’s proposed ‘showstopper’ constraints are not considered to be appropriate or reasonable.

6.54 Many of the identified ‘showstopper’ constraints are not fundamentally prohibitive to development and should not therefore be used as a means of restricting sites from consideration in the Local Plan process.

6.55 Through the preparation of the emerging Local Plan, Harworth is of the view that it is entirely appropriate and feasible for the Council to reconsider existing local planning policy designations, such as Local Green Spaces, Key Settlement Gaps, Strategic Open Space and Areas of Special County Value, subject to appropriate assessments and evidence being produced, to enable land to be proposed for development.

6.56 Furthermore, matters such as designated heritage assets, designated habitat sites, SSSI’s, irreplaceable habitats and flood risk are not explicitly prohibitive to new development occurring and can be appropriately mitigated, managed, or accommodated into new development as appropriate.

- 6.57 Harworth believes that the Council should produce a Local Plan which can deliver against its housing and employment requirement. To do this it is important that a strategy is put in place which provides a sufficient range of allocated sites to provide enough outlets to enable delivery to be maintained at the required levels throughout the Local Plan period.

Question SS 21

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

- 6.58 Please refer to response to Question IN 1.
- 6.59 Harworth's view is that it is crucial that the Council ensures that the preparation of the emerging Local Plan, and associated planning policies and allocations are justified through robust up-to-date evidence.

Question SS 22

Do you have any other comments or suggestions you wish to make about our approach to identifying potential growth areas or allocations in the new Local Plan?

- 6.60 As identified Harworth are of the view that in establishing a spatial strategy for the emerging Local Plan that CWAC should adopt an approach that focuses development around the most sustainable settlements in the Borough as well as around the most sustainable transport corridors to meet its development needs.
- 6.61 In this response Harworth acknowledges the Council's identification that a pragmatic approach should be taken to meet the future needs of Middlewich on land within CWAC. However, any future plan will need to go further than pragmatism; it will need to positively plan for and allocate land around Middlewich to meet the settlements development needs for the plan period.
- 6.62 This location offers a unique opportunity in the context of CWAC authority area to deliver residential and employment development in sustainable locations with direct integration to edge of the existing settlement including the existing residential area and the employment and industrial locations of the Cheshire Fresh site, and the existing Mid-Point 18.
- 6.63 By virtue of its relationship to Middlewich, development in this location also prioritises access to public transport, existing services, and infrastructure making it an entirely suitable residential growth opportunity.
- 6.64 This location also maximises the only site within CWAC that benefits from a strategic relationship with the adjacent to the M6, via the A54 (Holmes Chapel Road and Junction 18). This location also benefits from immediate connectivity to the Government approach Middlewich Eastern Bypass ("MEB") proposal which is situated to west and south within the Cheshire East authority area.
- 6.65 The MEB proposal will deliver a new two-way single carriageway road, connecting a new roundabout off Pochin Way to a new roundabout junction with the A533 Booth Lane to the south. The bypass seeks to ease traffic pressure within the centre of

Middlewich and increase safety and contribute to the delivery of housing and employment sites in Middlewich. Subject to Cheshire East's acceptance of revised costs work on the bypass is anticipated to commence in Spring 2026.

- 6.66 The unique location means that land adjacent to Middlewich is capable of accommodating sustainable residential and economic growth.
- 6.67 Identification of this land as either a potential growth areas or allocation(s) would enable CWAC to meet its own housing and economic growth needs while supporting cross-boundary infrastructure investment and the wider regeneration objectives for Mid Cheshire. A proactive approach to development in this location will ensure sustainable, connected development that delivers maximum benefit to both Cheshire West and Cheshire East.
- 6.68 The appropriateness of this location is emphasised when accounting for the advancement of a spatial strategy that seeks to focus development around the most sustainable settlements in the Borough as well as around sustainable transport corridors.
- 6.69 Section 7 below provides Harworth's further views on the role of Middlewich has to play in the emerging Local Plan, and meeting the development needs.

7. Middlewich (Chapter 12)

M1 Middlewich

Question MI 1

Do you agree with the suggested policy approach towards Middlewich, as set out in MI 'Middlewich' above? If not please suggest how it could be amended?

- 7.0 The emerging Local Plan seeks to continue close working and collaboration with Cheshire East ('CE') in relation to the future development needs and infrastructure of Middlewich. This is considered of considerable importance where the updated evidence published to date, namely the EDNA, affirms important cross-boundary relationships with regards the movement of labour. In the context of planning for sub-area functional economic market areas, for example, it recommends that it will *'be important for the Council to continue to liaise with neighbouring Authorities on strategic planning matters and to ensure that suitable employment opportunities are planned for in unison.'*²⁵
- 7.1 Harworth welcomes the identification of Middlewich within the emerging Local Plan and this intent, where it is recognised that its economic relationships span both authorities.
- 7.2 However, Harworth is of the view that the suggested policy approach, in its current form, is insufficient as it fails to recognise the significance and importance of the opportunity that exists in this location to proactively plan to meet the development needs of both CWAC and CE for Middlewich.
- 7.3 The I&O Document recognises that there are different timelines for local plan preparation (with the CWAC Local Plan currently ahead of preparation of a new plan for CE) and seek to understand how the future needs of Middlewich be met.
- 7.4 Nonetheless, the future policy should positively respond to the development needs of Middlewich and must be framed in the context of the cross-boundary relationship between CWAC and CE, and the ability of both authorities to plan positively for the town's long-term growth in the emerging Local Plan.
- 7.5 To do so, it is first necessary to understand the scale of development sought in Middlewich through the adopted Cheshire East Local Plan and that is likely to be sought for CE's emerging Local Plan.
- 7.6 CE's adopted Local Plan Strategy ('LPS') (2010 – 2030) (July 2017) makes provision for a minimum of 380 ha of employment land for business, general industrial, and storage and distribution uses, and 36,000 homes to meet the full, objectively assessed needs for the borough²⁶.

²⁵ Cheshire West and Chester Economic Development Needs Assessment (March 2025) paragraph 2.58

²⁶ Policy PG 1 Overall Development Strategy

- 7.7 For Middlewich, a defined Key Service Centre²⁷, the LPS identified that it is expected to accommodate the plans largest quantum of employment land within a Settlement (75ha), as well as 1,950 new homes over the plan period. The LPS recognises that the development identified for Middlewich is of a scale, location and nature that has the greatest potential to generate economic growth and support the vitality and viability of the centre.
- 7.8 To deliver this quantum of development the LPS allocates four strategic sites in and around Middlewich:
- LPS 42 – Glebe Farm – identified for the delivery of 525 homes.
 - LPS 43 – Brooks Lane – identified for a mixed-use development comprising of 200 homes, leisure and community facilities, and retail facilities.
 - LPS 44 – Midpoint 18 – Phased delivery of 70ha of employment land within an undeveloped area of 121ha. The remaining 50ha is identified will be released for employment purposes when required.
 - LPS 45 – Warmingham Lane – identified for around 235 dwellings.
- 7.9 Within CE’s Site Allocations Development Plan Document (‘SADPD’) a further five sites are allocated for employment and residential developments (which the Settlement boundary). This includes:
- MID 1- East and West of Croxton Lane (50 dwellings).
 - MID 2 – Centurion Way (75 dwellings).
 - EMP 1 – Ma6nitude, Middlewich (contained within LPS 44).
 - EMP 2.6 - New Farm, Middlewich (7.83 ha for B2/B8 uses) (it does however no count as contributing to the employment requirement as it is a redevelopment site and is not new employment land).
 - EMP 2.8 - Land at British Salt, Middlewich (7.05 ha for B2/B8 uses).
- 7.10 CE Council’s latest Annual Monitoring Report (‘AMR’) 2023/24 confirms that as of 31st March 2024 a total of 21.30 ha of employment land has been taken up in Middlewich. This constitutes the largest amount of take-up of any of the key service centres and is second only to Crewe (36.06 ha)²⁸.
- 7.11 Most of this take-up was concentrated in Midpoint 18, located to the east of the settlement and near the border with CWAC. It is further noted that this site alone has a further 111.27 ha of committed land. This affirms the proven scale of demand for employment land within Middlewich and assuming that the remaining commitment is

²⁷ Policy PG 2 Settlement Hierarchy

²⁸ Cheshire East Annual Monitoring Report 2023/24, Tables 13.6 and 13.7

built out in a reasonable time will significantly exceed the amount of land expected to be delivered in the plan period within the town (75 ha).

- 7.12 With respect of housing provision, the AMR identifies a comparatively positive story with regards to delivery within Middlewich. It identifies that completions and commitments to 31st March 2024 comprise of 844 dwellings and 853 dwellings respectively, and totalling 1,697 dwellings. The total quantum of residential development completed and committed within the plan period to 31st March 2024 equates to 121 dwellings per annum (over the 14-year period 2010 – 2014). LPS Table 8.4 forecast that residential dwellings will be delivered in Middlewich at an average of 98 dwellings over the plan period. This again affirms that the town is expected to deliver strongly against the Plan's expected level of delivery (1,950 dwellings), whilst recognising that there are a number of years remaining until the end of the plan period.
- 7.13 On the basis of CE's adopted LPS development needs for Middlewich, evidence demonstrates and indicates that the anticipated figures of Policy PG1 over the plan period can be expected to be exceeded.**
- 7.14 Therefore, both CWAC and CEC should continue to plan, as a minimum, for the same scale of development identified as was set out in the CE adopted Local Plan for Middlewich. The level of growth experienced within the current plan period is reflective of the established role of Middlewich as a Key Service Centre and its strategic position on the M6 corridor.
- 7.15 Maintaining this scale of development throughout the emerging Plan period is essential to meeting both the housing and employment needs of the town, supporting the delivery of the Government-approved Middlewich Eastern Bypass, and ensuring that Middlewich can continue to play its full role in supporting economic growth and regeneration across Mid Cheshire.
- 7.16 Any reduction in the planned scale of development could risk undermining the town's long-term sustainability, its infrastructure-led growth potential, and the opportunity to secure new and more skilled employment opportunities in this strategically important location.
- 7.17 The ability of CE to accommodate the identified scale of growth for Middlewich is, however, severely constrained. The current spatial distribution of strategic allocations places most of the employment land to the east of the town, with expansion only possible to the south of Midpoint 18 or east into CWAC. The AMR indicates that within this site only circa 25 ha remains without permission²⁹. To the north, there is very limited available land within CE's administrative boundary capable of delivering new residential development. To the west, land within CE's administrative boundary is limited and further constrained by insufficient infrastructure capacity to support development of a strategic scale.
- 7.18 As a result, Middlewich has very limited opportunities to grow sustainably within Cheshire East's boundary. **This makes expansion into land immediately east of**

²⁹ Cheshire East Annual Monitoring Report 2023/24, Table 13.7

Middlewich, within CWAC, one of the only realistic options to deliver new development - particularly for employment land - at the strategic scale required to meet the town's anticipated level of growth over the new plan period given its role as a Key Service Centre and its strategic position on the M6 corridor.

7.19 In this context, it is essential that the emerging Local Plan recognises the shared functional role of Middlewich and proactively identifies opportunities to accommodate growth within its boundary. The land immediately east of Middlewich, lying within CWAC, represents a unique opportunity to define a strategic growth area and/or residential and employment allocations. The suitability of which is evidenced within Harworth's standalone representation to the I&O Document which promotes land at Holmes Chapel Road, east of Middlewich as an allocation for employment and residential development in the new CWAC Local Plan.

7.20 Development in this location would:

- Help meet development needs for Middlewich, especially the significant requirement for employment land, in a location directly integrated with the Key Service Centres established employment and industrial area (Mid-Point 18 (CE Allocation LPS 44) and Cheshire Fresh and associated infrastructure.
- Deliver development in a strategic location that maximises its locational advantages and proximity to the M6 corridor (as the only site in CWAC that benefits from such a location), the A54, and the Government-approved Middlewich Eastern Bypass, ensuring that growth is infrastructure-led and sustainable.
- Contributes to CWAC's own housing and economic growth objectives, making use of land adjacent to an identified Key Service Centre in CE that is not subject to Green Belt constraints.
- Supports long-term economic transformation, enabling the delivery of new and more skilled jobs across a range of employment sectors, encouraging inward investment, and sustaining the vitality and vibrancy of Middlewich as a whole.

Question MI 2

What issues should be considered through the Cheshire West and Chester Local Plan to ensure the future needs of Middlewich are properly considered?

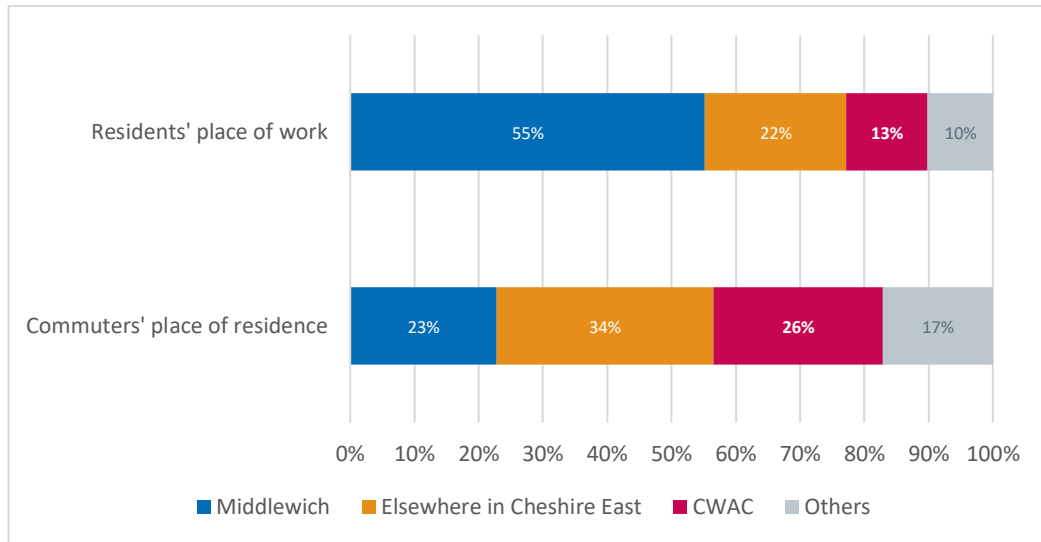
7.21 Harworth's response to Question MI 1 demonstrates that the future development needs of Middlewich and must be framed in the context of the cross-boundary relationship between CWAC and CE, and the ability of both authorities to plan positively for the town's long-term growth in the emerging Local Plan.

7.22 Failing to do so risks undermining the town's long-term sustainability, its infrastructure-led growth potential, and the opportunity to secure new and more skilled employment opportunities in this strategically important location.

7.23 In affirming the importance of cross-boundary planning in this regard consideration has been given to current commuting patterns, drawing on the results of the 2021 Census. Figure 7.1 shows that where there is a strong level of containment of residents working

within the town and a further 22% working elsewhere in Cheshire, it is notable that as many as 13% – or roughly one in eight – travelled to work in CWAC. CWAC also supplied labour to fill over a quarter (26%) of all jobs based at workplaces in Middlewich, proving that the town has an important economic relationship not only with parts of Cheshire East but also CWAC.

Figure 7.1: Commuting Patterns in Middlewich (2021)

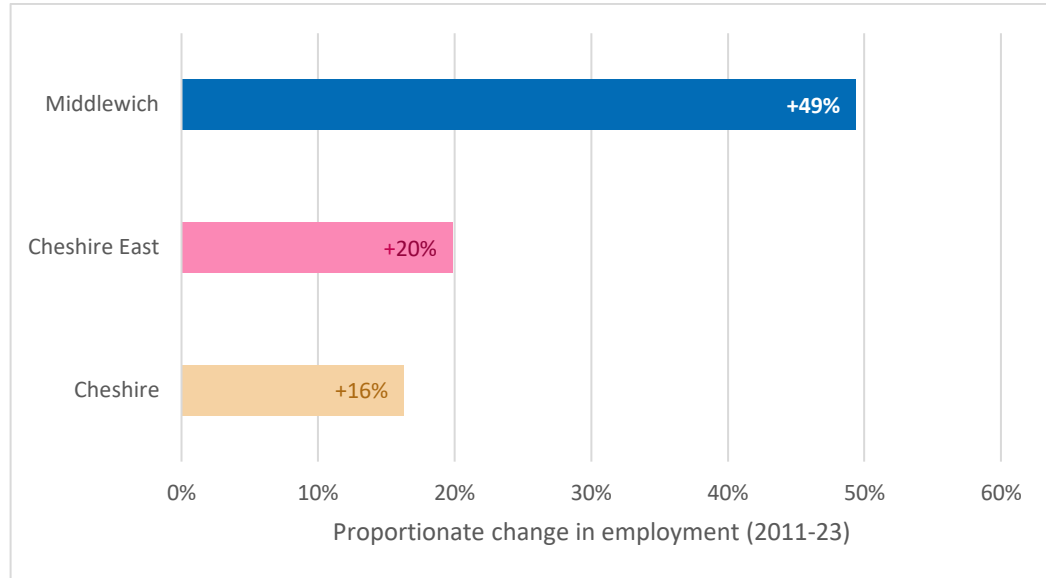


Source: Census 2021

- 7.24 Therefore, the key issues that CWAC should address to ensure the future needs of Middlewich are properly considered through the emerging Local Plan include:
- The scale of development sought that is likely to be sought for CE’s emerging Local Plan for Middlewich;
 - The ability of CE to accommodate the identified scale of growth for Middlewich given that available land within CE is inherently limited; and,
 - The role that land within CWAC has to play in securing the future prosperity of Middlewich by virtue of its proximity to the M6 corridor and the ability to maximise the opportunities for new and more skilled jobs across a range of employment types.
- 7.25 To start informing consideration of the above, analysis has been undertaken of a series of key indicators to understand the importance of sustaining the growth of Middlewich.
- 7.26 Looking first at the town’s capacity to accommodate new employment opportunities, recognising the take-up of land referenced above, Figure 7.2 highlights the strong performance achieved over the last ten years of available data when benchmarked against Cheshire East and Cheshire. This shows that the number of jobs has increased

by almost half (49%) since 2011, comfortably outpacing the growth seen over the same period across both Cheshire East and Cheshire more widely³⁰.

Figure 7.2: Change in Employment (2011-23)



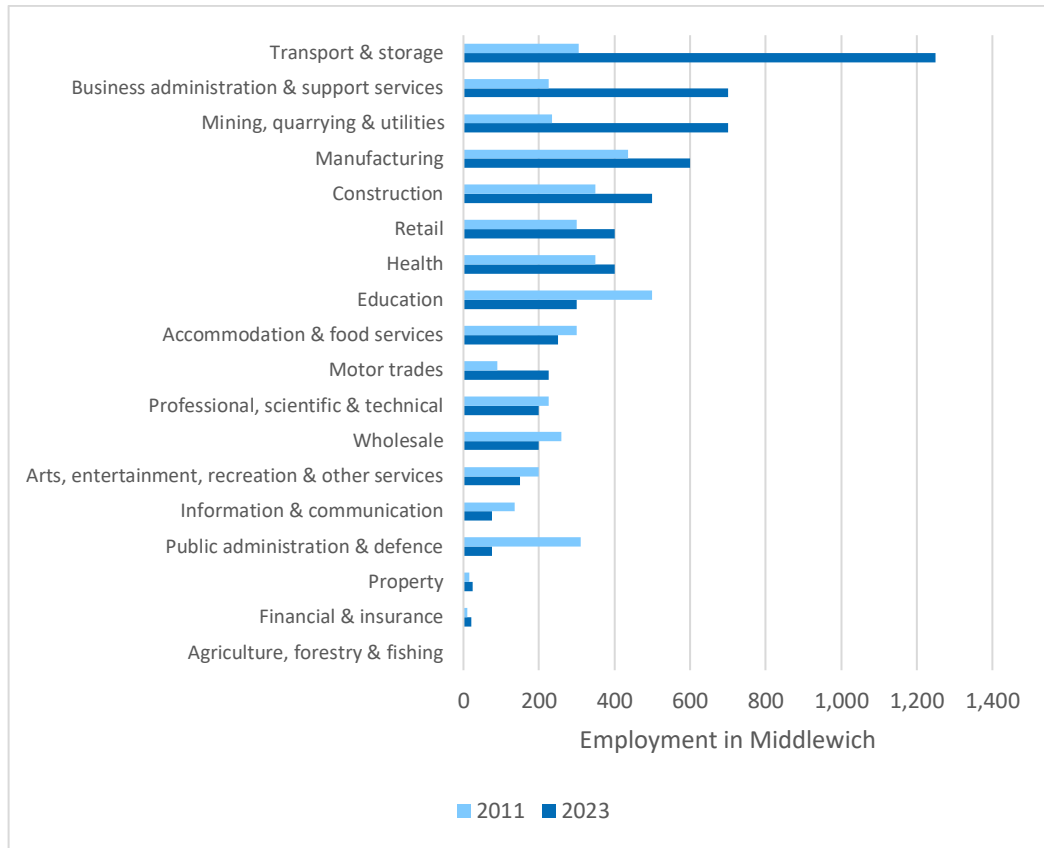
Source: BRES; Turley analysis

7.27 Further investigation suggests that over half of the jobs created in Middlewich since 2011 have been in the transport and storage sector, indicating that the town has a growing specialism in logistics which has enabled the creation of some 945 jobs³¹.

Figure 7.3: Change in Employment in Middlewich by Sector (2011-23)

³⁰ ONS (2024) Business Register and Employment Survey

³¹ *Ibid*

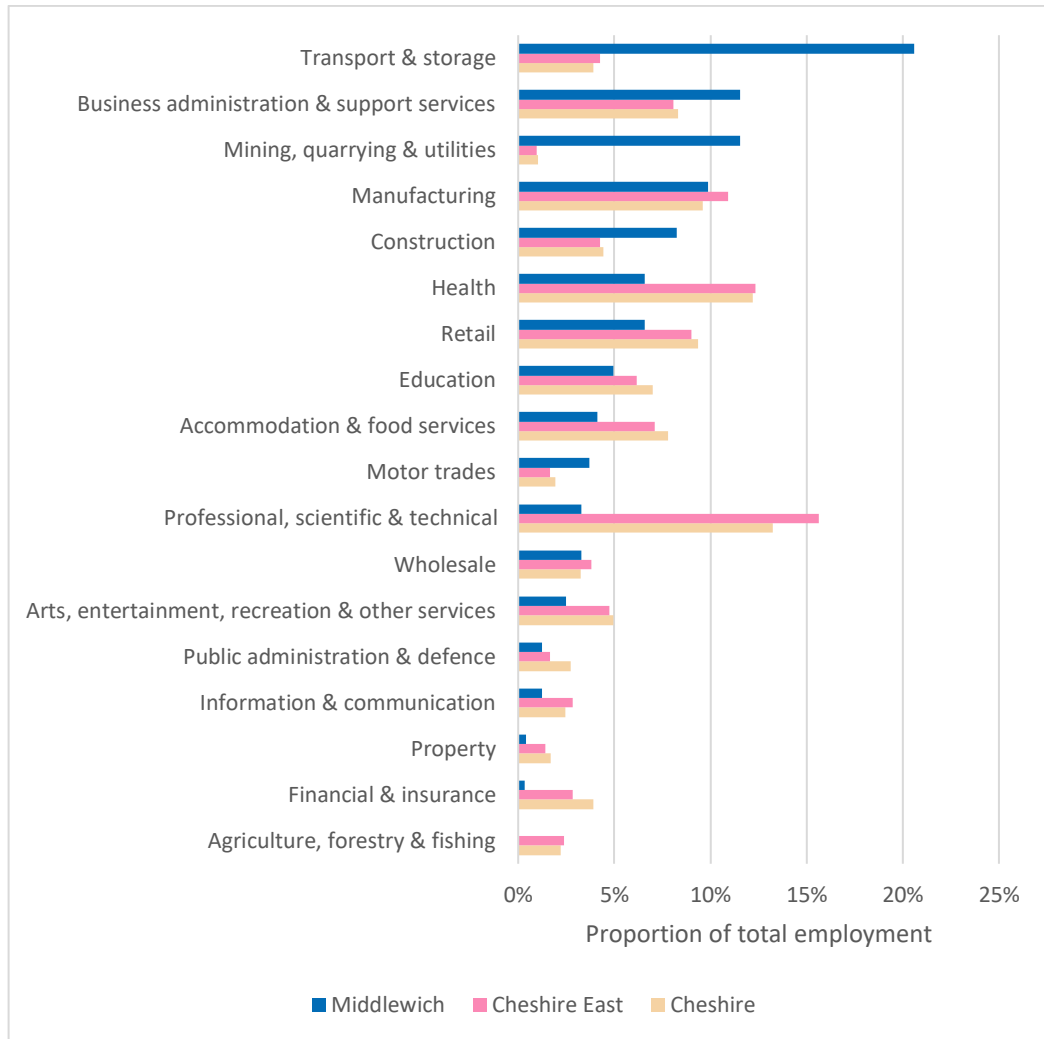


Source: BRES; Turley analysis

7.28 Following recent growth, the transport and storage sector is now responsible for more than a fifth of all jobs in Middlewich, far higher than the equivalent figures for both Cheshire East (4%) and Cheshire as a whole³² (4%). The town can also be seen to have particular strengths in business administration and support services, as well as mining, quarrying and utilities.

Figure 7.4: Share of Employment by Sector (2023)

³² *Ibid*



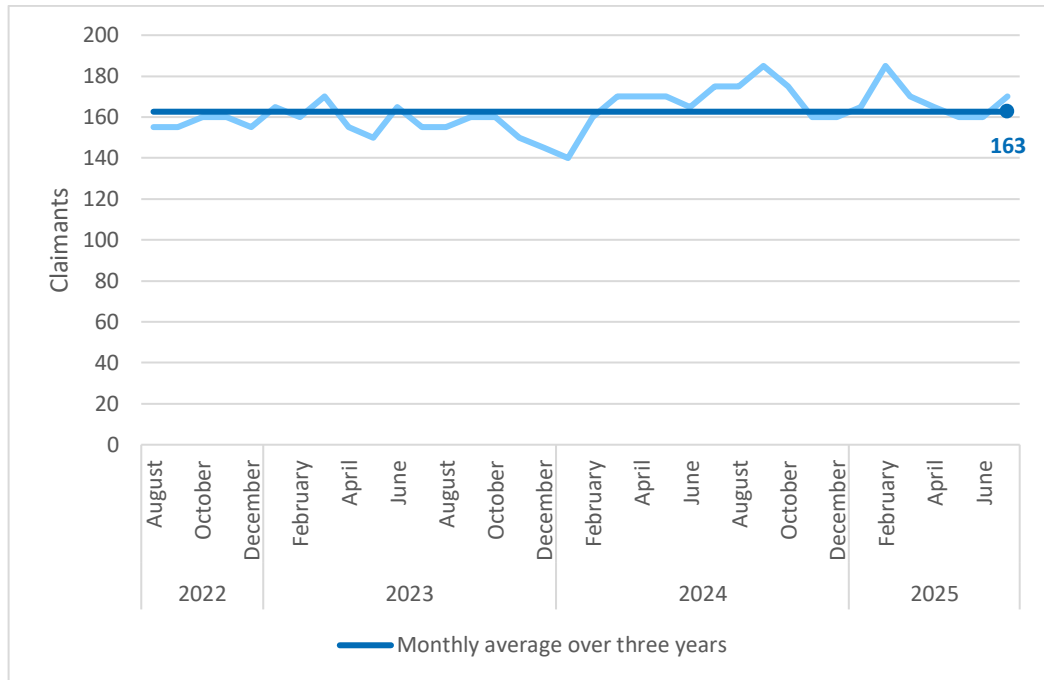
Source: BRES; Turley analysis

7.29 New and existing businesses will likely need to recruit if the town is to build upon this increasingly promising foundation and maximise the opportunities brought by its specialisms. There has though tended to be only a limited pool of latent labour available, with an average of only around 165 people being out of work each month over the last three years³³. This equates to only 1.4% of the adult population (16+) estimated prior to this period, lower than the equivalent figures for Cheshire East (1.7%) and Cheshire (1.8%) in a sign that the local labour market is relatively tight³⁴.

Figure 7.5: Claimant Count in Middlewich (2022-25)

³³ ONS (July 2025) Claimant count by sex and age

³⁴ ONS (2024) Population estimates – small area (2021 based) by single year of age – England and Wales

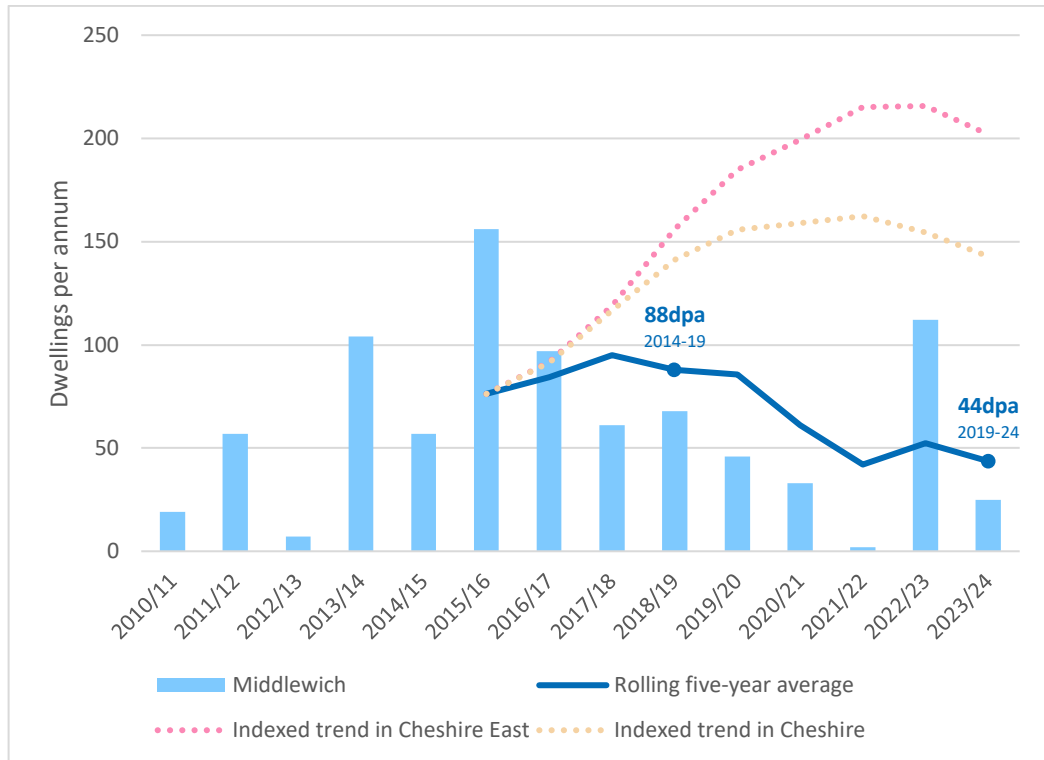


Source: ONS

7.30 The accommodation of a future labour-force will be dependent in large part on the parallel provision of housing. As referenced above the town has seen strong historic delivery affirming a **sustained and strong demand for housing**. Figure 7.6, however, shows that **the pace of development is markedly slowing**, with an average of only 44 homes having been completed annually over the last five reported years (2019-24). This is only half as many as were completed in the five years prior. Such a pronounced slowing contrasts with the trend throughout Cheshire and particularly in Cheshire East, where average delivery rates have respectively increased by 1% and 29%³⁵.

Figure 7.6: Housing Delivery in Middlewich (2010-24)

³⁵ An average of 2,552 homes per annum have reportedly been completed throughout Cheshire East since 2019, some 29% more than in the five years prior (1,971dpa). Circa 4,057 homes have been completed annually throughout Cheshire since 2019, compared to 4,013 in the five years prior



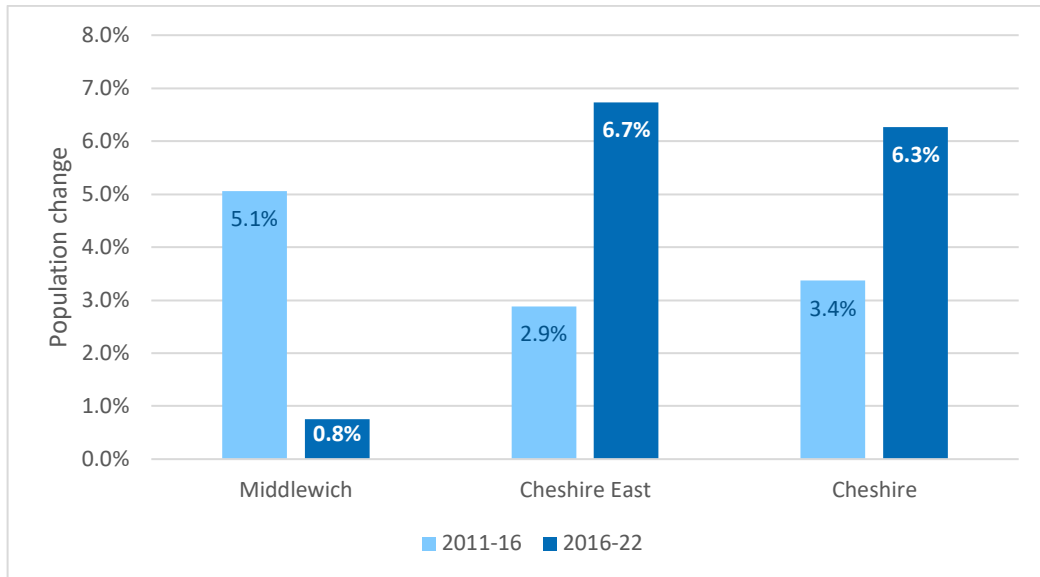
Source: Council monitoring; Turley analysis

7.31 The importance of ensuring a pipeline of sites to enable a return to stronger rates of delivery is important where it appears that the recent slowdown has had an impact on the town’s demographic profile. Official estimates from the Office for National Statistics³⁶ (ONS) – available up to 2022 – suggest that Middlewich saw relatively strong population growth as housing delivery rose in the years to 2016, surpassing that seen both in Cheshire East and across the whole of Cheshire³⁷. This does though now appear to have stalled, with **the population reported to have since grown by less than a fifth** as much in direct contrast to the acceleration seen more widely.

Figure 7.7: Comparing Population Change (2011-22)

³⁶ ONS (2024) Population estimates – small area (2021 based) by single year of age – England and Wales

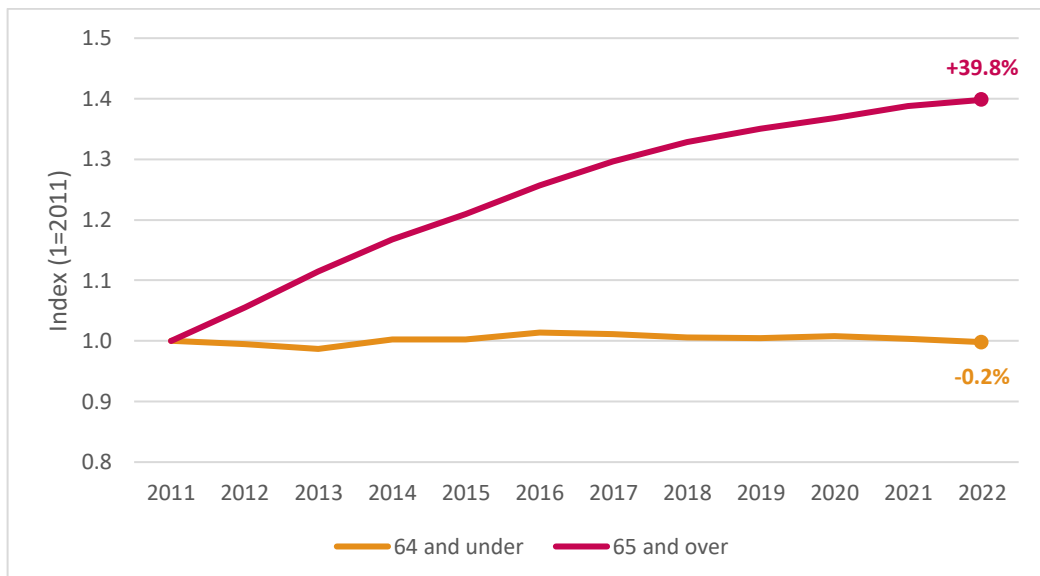
³⁷ ONS (2025) Population estimates – local authority based by single year of age



Source: ONS

7.32 This has meant that only the older population of Middlewich, aged 65 and above, has grown since 2011. The population has otherwise been relatively stable and indeed slightly shrunk. This profile presents a **challenge for sustaining the town’s local economy and sustainably supporting the generation of new employment opportunities** which, as identified above in the context of commitments on existing employment land, would be expected to be sustained.

Figure 7.8: Indexed Population Change by Age Cohort (2011-22)

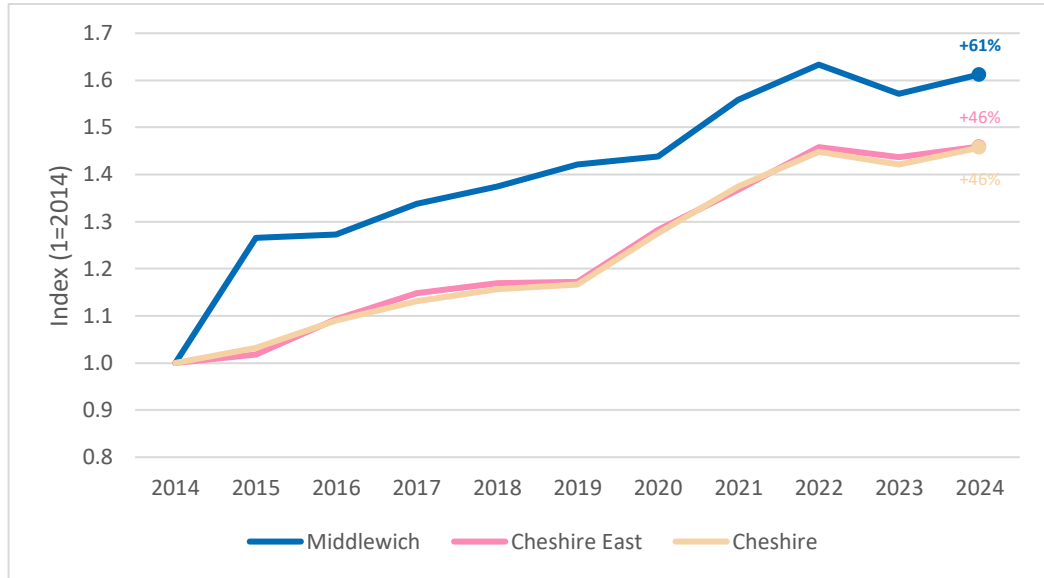


Source: ONS

7.33 Another adverse consequence of a slowdown in delivery appears to be a **rising cost of housing**. This recognises that the average cost of purchasing a home in Middlewich has

risen by some 61% over the last reported decade³⁸ (2014-24). Prices have thus grown over a third faster than in Cheshire East or Cheshire as a whole (both 46%).

Figure 7.9: Indexed Change in Average Price Paid (2014-24)



Source: Land Registry

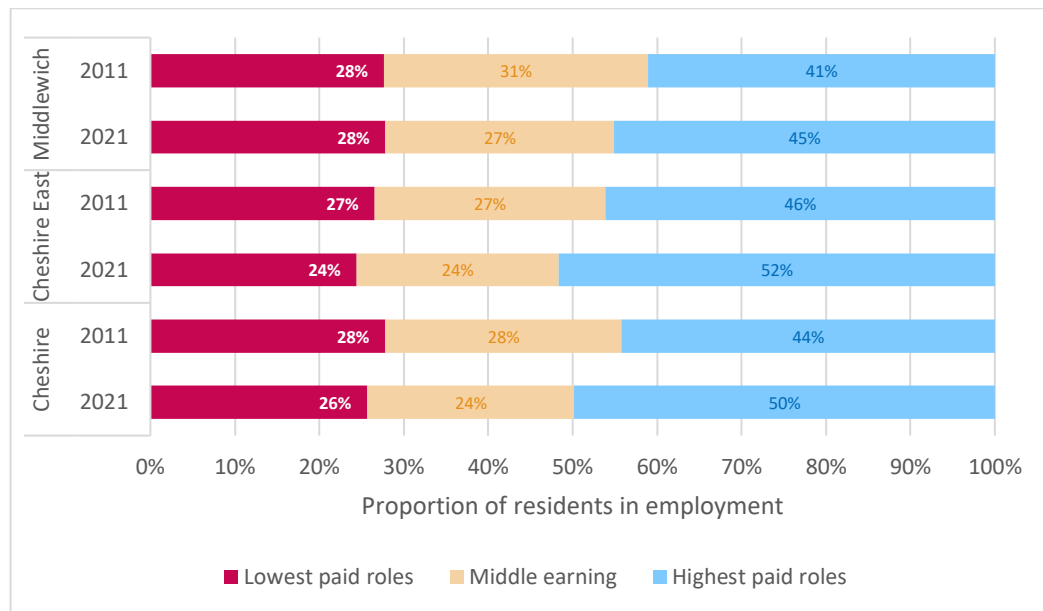
- 7.34 A continuation of this trend could jeopardise the town’s proven ability to offer more affordable housing to those working in roles that tend to be the lowest paid, at least at the regional level for which this insight is available³⁹. While increasingly few such individuals appear able to afford the cost of living in Cheshire East, or indeed anywhere in Cheshire, Middlewich has so far managed to sustain a position whereby 28% of residents work in lower-paid occupations, both in 2011 and 2021⁴⁰.

³⁸ Land Registry (2025) Price paid data, allocated to Middlewich based on the postcodes that fall within the ward

³⁹ ONS (2024) Earnings and hours worked, region by occupation by two-digit SOC: ASHE Table 3

⁴⁰ The lowest paid roles in the North West – based on the Standard Occupational Classification (SOC) – are elementary occupations; sales and customer service occupations; and caring, leisure and other service occupations. The highest paid roles are managers, directors, and senior officials; professional occupations; and associate professional and technical occupations

Figure 7.10: Comparing Residents' Occupations by Earnings (2021)



Source: Census 2021

- 7.35 The initial analysis presented above provides a compelling picture of the key issues facing Middlewich to which the Plan must respond and plan positively.

Question MI 3

With the Cheshire West and Chester and Cheshire East Local Plans currently on different timelines, how can any potential future needs for Middlewich be met?

- 7.36 Even though CE and CWAC plans are on different timelines, it is still feasible for CWAC to proactively and positively plan to meet the future development needs of Middlewich by safeguarding and allocating land east of the settlement.
- 7.37 As highlighted in response to MI 1, the policy should align with the functional cross-boundary connectivity of land within CWAC with Middlewich and recognise that the housing, employment, and infrastructure needs cannot be planned for in isolation.
- 7.38 MI 1 also demonstrates that the development needs of Middlewich is unlikely to be able to be met on land within the CE. Therefore, land within CWAC has a role to play in accommodating Middlewich’s needs irrespective of the independent Local Plan timescales and the emerging Local Plan must explicitly acknowledge and plan for the role it has to play.
- 7.39 In accordance with Paragraph 24 of the NPPF effective strategic planning across Local Planning Authority (LPA) boundaries has a vital and increasing role in how sustainable growth is delivered. Through the duty to cooperate LPAs are able to address key spatial issues including meeting housing needs, delivering strategic infrastructure, and building economic resilience on strategic matters that cross administrative boundaries – such as is the case with meeting the development needs of Middlewich.

- 7.40 Despite being on different trajectories for the preparation of their respective emerging Local Plans both CWAC and CE, the NPPF⁴¹ establishes a need for the LPAs to collaborate to identify the relevant strategic matters which they need to address in their plans.
- 7.41 The establishment of an effective cross boundary approach will be an integral part of the production of a positively prepared and justified policy approach to meeting the development needs of Middlewich on land within CWAC that cannot be met wholly within the CE plan area in accordance with NPPF Paragraph 11b.
- 7.42 On this particular matter CWAC and CE should make sure that their plan policies for Middlewich align as closely as possible given the strategic relationship that exists.
- 7.43 The NPPF is also clear⁴² that in order to demonstrate effective and on-going joint working, CWAC and CE should prepare and maintain a statement of common ground ('SoCG') documenting how the cross-boundary matters affecting Middlewich are being addressed. As plan-making advances the SoCG should be made available.
- 7.44 This approach would ensure that cross-boundary needs of Middlewich can be met in full, and that the strategic opportunity at Middlewich to plan for long-term growth in the emerging CWAC Local Plan is not lost due to misaligned plan development.

Question MI 4

Could land be safeguarded to be released for development, if a need was established through the Cheshire East Local Plan?

- 7.45 In the event that land within CWAC is not allocated to meet the identified needs of Middlewich, then land could be safeguarded to provide flexibility to meet Middlewich's identified and emerging development needs.
- 7.46 Albeit, as has been evidenced through responses to MI, MI 2, and MI 3 it is highly unlikely that the anticipated scale of development needs of Middlewich can be accommodated entirely within CE's boundary, particularly in relation to employment land. Therefore, land should be allocated for development during the plan period, and not safeguarded to meet longer-term development needs stretching well beyond the plan period.
- 7.47 The allocation of land within CWAC would demonstrate a proactive and committed approach to addressing the likely unmet development needs of Middlewich within CE's emerging Local Plan. It would also secure wider benefits for CWAC in terms of housing delivery, employment growth, and infrastructure investment.

Question MI 5

What approach should be taken to the 'Cheshire Fresh' site and do you have any comments on other land put forward for future allocation around Middlewich?

⁴¹ NPPF, Paragraph 25

⁴² NPPF, Paragraph 28

- 7.48 Harworth has submitted a standalone representation to the Regulation 18 Consultation which promotes land at Holmes Chapel Road, east of Middlewich as an allocation for employment and residential development in the new CWAC Local Plan.
- 7.49 For the reasons set out in the standalone representation, and as detailed in response to Question SS22, MI 1 there is a compelling case for CWAC to identify this broad location as a potential growth option, or allocated land for both residential and employment development.

8. Green Belt and Countryside (Chapter 13)

GB1 Green Belt and countryside

Question GB 1

Do you agree with the suggested policy approach towards Green Belt and countryside, as set out in GB 1 'Green Belt and countryside' above? If not please suggest how it could be amended.

- 8.0 The new Local Plan must reflect the latest national policy context with respect to Green Belt, as set out in the revised NPPF (December 2024) and updated Green Belt PPG (February 2025). This includes the introduction of grey belt land and the role this has to play in delivering housing (and employment) growth. The policy should also have due regard to the emerging Green Belt review evidence (once completed). The Council should consult on its proposed methodology and approach for the Green Belt Assessment as soon as possible and prior to the work being undertaken.
- 8.1 The countryside boundaries will need to be amended to reflect the spatial strategy, revised settlement boundaries and site allocations to meet housing (and employment) needs as identified in the emerging Local Plan.

9. Infrastructure and developer contributions (Chapter 15)

ID 1 Infrastructure and developer contributions

Question ID 1

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.

- 9.0 Paragraph 35 of the NPPF makes clear that Local Plans should set out the contributions expected from development and that such policies should not undermine the deliverability of the Local Plan. To ensure it is deliverable, the emerging Local Plan should be supported by a Viability Appraisal which demonstrates that the infrastructure needed to support the amount of new development proposed is viable. It will also be important to ensure that any increase in viability pressures do not place too high a burden on developer contributions which may serve to undermine the deliverability of the emerging Local Plan policies and the associated Infrastructure Development Plan (IDP) (once produced).
- 9.1 Development can only be required to mitigate its own impact and cannot be required to address existing deficiencies in infrastructure or services. It is therefore essential for the IDP to clearly show the existing and known deficiencies in current infrastructure provision, before reaching any conclusion on the cumulative effects of new development, and any contribution that is needed from new development to mitigate any additional individual and/or cumulative impacts.

Question ID 2

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

- 9.2 No. All development should contribute to infrastructure provision required to enable its delivery, in a proportionate way (subject to viability).
- 9.3 Major development should be defined in accordance with the definition established in the NPPF (Glossary) to ensure consistency with other policy requirements: *“For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m² or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015”*.

Question ID 3

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

- 9.4 No. The funding of infrastructure requirements should be determined on a case-by-case basis, informed by the Local Plan IDP, reflecting the scale of development which

would benefit from that investment. Where infrastructure is required to support multiple sites, possibly delivered in phases, with different developers/applicants, this should be shared by all parties. Similarly, infrastructure delivered by development may also have wider benefits associated with Council / others strategic priorities, which could benefit from funding streams available to the Council / others but not the developer / applicant.

10. Employment Growth, Employment and Enterprise (Chapter 16)

EG 1 Economic growth, employment, and enterprise

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?

- 10.0 Harworth supports the policy's broad goals of promoting sustainable economic growth; however, we believe the Council should adopt a more ambitious stance towards employment development. To support long-term prosperity, we advocate for an expanded provision of employment land, particularly for emerging sectors like digital, technology, and knowledge-based industries as well as B2 (General Industrial) and B8 (Storage and Distribution) uses support economic growth and employment opportunities. The policy should incorporate a flexible, diverse approach to land use, accommodating both large-scale industrial requirements and small-scale business hubs. We encourage a review of current allocations to ensure an adequate supply of employment space and the identification of a sufficient supply of employment land to enable the borough to stay competitive, attract inward investment, and support local business growth.

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?

- 10.1 The strategic locations identified (e.g., Chester Business Park, Gadbrook Business Park, and Cheshire Oaks Business Park) are well-established and critical for the area's economic development. However, it may be beneficial to consider additional locations, particularly those on the periphery of key growth areas, where demand for larger-scale industrial and logistical operations are already in operation and where the intensification of use is likely to increase for example, on land within the CWAC authority area that abuts the establish employment location of Midpoint 18 in Middlewich.

11. Housing (Chapter 19)

HO 1 Mix and type of housing in new developments and specialist housing

Question HO 1

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

- 11.0 Harworth is supportive of the approach to providing a range and choice of homes to meet the needs of the local area, and agrees that the emerging Local Plan should encourage a mix of house types, sizes, and tenures to be delivered, helping to ensure choice for homebuyers. However, Harworth believes that any policy must be applied flexibly and not be overly prescriptive, in order to prevent housing delivery from being compromised or stalled. Policies of the emerging Local Plan should also make an allowance for changes in market demand. Any housing mix policy should also allow regard to be had to the scale of the site, not being rigidly prescriptive in the mix provided if this is not the most suitable approach allowing for site constraints and having regard to the potential impact of housing mix on viability. There should not be a need for the developer / applicant to provide significant amounts of additional evidence to justify the proposed housing mix.
- 11.1 Harworth notes that the Council suggest that if justified by evidence a new policy will be brought into require Nationally Described Space Standards (NDSS). UK Government has made clear that the NDSS are intended to be optional and should only be introduced where there is a clear need for them and they retain development viability. The evidence required to justify NDSS policies is set out within Planning Practice Guidance, which includes evidencing need, viability, and timing.
- 11.2 If the Government expected all properties to be built to NDSS then it would have made these standards mandatory not optional.
- 11.3 Should CWAC progress a new policy requiring compliance with NDSS there is a need for appropriate and robust evidence to justify its inclusion.

Question HO 2

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

- 11.4 No. As per response to Question HO 2, any housing mix policy should not be overtly prescriptive. A percentage based policy approach is considered to be overly restrictive and would fail to allow for changes in market conditions and site specific considerations. Such an approach would not be positively prepared, justified, or effective.

HO 2 Delivering affordable housing

Question HO 4

Do you agree with the suggested policy approach towards delivering affordable housing, as set out in [HO 2 'Delivering affordable housing'](#) above? If not, please suggest how it could be amended?

- 11.5 Harworth notes that the proposed policy suggests that affordable housing will be required on all sites of 10 or more dwellings but in designated rural areas it will be three or more dwellings.
- 11.6 Harworth considers that it is appropriate for the Council to plan for the affordable needs of its community, and to ensure that it does this in line with the requirements in paragraph 35 and 64-66 of the NPPF. This should ensure that any affordable housing requirements are clearly set out, are evidenced as viable through a Viability Appraisal, and that flexibility is provided within the policy where viability may be an issue.

HO 3 Proposals for residential development

Question HO 6

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

- 11.7 Existing Local Plan (Part Two) Policy DM19 relates to proposals for residential development on land not allocated for development, including those within identified settlements, the countryside, and the Green Belt. This policy should be reviewed to ensure it aligns with the latest NPPF.

Question HO 7

Are Local Plan (Part Two) policies DM 19, DM21 and DM 22 working effectively; remain relevant; or are all issues covered by current national policy and guidance?

- 11.8 Refer to response to Question HO 6.

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