

Our Ref: KN/AJ/CWaC_Reg18

29 August 2025

Planning,
Cheshire West and Chester Council,
The Portal,
Wellington Road,
Ellesmere Port,
CH65 0BA

via email

Dear Sir/Madam,

**RE: Cheshire West & Chester Reg 18 Local Plan Issues and Options Consultation
August 2025**

Submission on behalf of Muller Property Group

These representations have been prepared by Walsingham Planning on behalf of Muller Property Group and relate to the consultation on the Regulation 18 Local Plan Issues and Options Consultation.

Question VI 1

Do you agree with the suggested approach towards the new Local Plan vision, as set out in VII 'Vision' above? If not please suggest how it could be amended?

The vision should include an aim to provide a sufficient supply of homes to meet the minimum housing needs of its residents as one of its key priorities

Question VI 2

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

We agree with the majority of the principles and priorities set out in Policy VII. However, Cheshire West and Chester is currently facing a significant shortfall in housing numbers and, as detailed later in the consultation draft, is facing a significant increase in the number of new homes that will have to be delivered over the next plan period. We believe therefore that including housing delivery as a key Priority is an essential element of the Vision for the emerging plan and must be included in Policy VII.

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?



This approach is supported, however it should be expanded to include further settlements, including some of the larger villages in the rural areas. This would be consistent with the strategy approaches detailed later in the consultation, particularly Option B which would see sustainable and accessible villages in rural areas take relatively significant housing numbers.

Question OB 1

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

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

Option B is preferable as it allows for development to be more evenly distributed across the authority. The current Local Plan objectives focus development primarily towards Chester, Ellesmere Port, Northwich and Winsford. While there is some logic to this approach, it should be noted that Chester and Ellesmere Port and to a large degree Northwich are all heavily constrained by the Green Belt, hampering their ability to deliver significant housing numbers without significant Green Belt release. Clearly, Winsford, on the other hand, is already equipped to support unconstrained housing growth.

Question SD 1

Do you agree with the suggested policy approach towards sustainable development, as set out in [SD 1 'Sustainable development'](#) above? If not please suggest how it could be amended?

Mitigating Climate change, point 1 should be amended to include a viability / practicality mechanism. It would be detrimental to the delivery of some sites to require low carbon design, embodied carbon and energy consumption measures where not viable or feasible.

Point 2 states “Strategic sites should be connected to a district heat network. Where this is not currently feasible, new homes should be built with the necessary infrastructure in place to enable such connections to be easily integrated in the future.” A viability / practicality mechanism should be incorporated into this. It may be too onerous for some sites to deliver such infrastructure, particularly where there is no prospect of the district heat source coming forward in the future.

Question SS 1

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

No. The Council should provide for at least the required minimum number of homes over the plan period.

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?

Whilst there is some logic to this in that it may reduce the initial backlog, it is unclear if the Council will be able to deliver the commensurately much greater numbers of housing later in the plan period. Should a stepped approach be deployed, the PPG states that it is necessary to identify the stepped requirement in strategic housing policy, and to set out evidence to support this approach, and not seek to unnecessarily delay meeting identified development needs.



Indeed, CWaC has already been exceeding its housing target on an annual basis since 2015. The Housing Delivery Test shows that completions stood at 276% of the residual local plan housing requirement over the last 3 years: 1,281 (2022), 1,530 (2023) and 1,399 (2024). The Local Planning Authority therefore has been planning positively for growth and has the momentum to achieve the increased Local Housing Need (LHN) early on in the new plan period. This has seen CWaC already ramping up towards the new LHN, before it was even published in late 2024.

Walsingham and our client therefore consider that a lower stepped housing requirement is not appropriate in the early stages of the plan period.

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?

Spatial Strategy Principles (SS3) suggests a strategy of brownfield within the built up area first, and allowing edge of settlement development where options within the built up area have been exhausted- including the release of Green Belt land where needed.

“The spatial strategy will follow the principle of directing new development and allocating land, towards previously developed sites within settlements first, as they are the most sustainable locations with best access to services and facilities...”

Where there are not enough planning permissions and opportunities for redevelopment within urban areas and towns, the approach will be to develop on the edge of existing settlements in locations with the best access to public transport and existing services and infrastructure, as the next best sustainable option”

The principle of utilising brownfield land effectively is accepted. However, giving primacy to brownfield land within the built up area has the potential to delay permissions, as edge of settlement applications may have to wait for PDL opportunities to be exhausted before they are considered favourably.

PDL is unlikely to deliver the quantum of new homes required, is often complex, and may require significant remediation before the site can be delivered, all affecting the timeliness and viability of delivery. See for example 21/05070/OUT, an outline planning permission for 1,550 dwellings on the former Winnington Works site, Northwich, which was validated in December 2021 and has yet to be granted permission, despite being an allocated site.

We believe that, in order to deliver the requisite number of homes over the plan period, the Council should adopt a pragmatic approach and direct new development and allocate land on brownfield sites where feasible and viable, alongside sustainable development on the edge of settlements. The policy text could be reworded:

*Where there **are limited feasible or viable** planning permissions and opportunities for redevelopment within urban areas and towns, the approach will be to develop on the edge of existing settlements in locations with **good** access to public transport and existing services and infrastructure, **or where these can be provided or improved**, as the next best sustainable option”*

In any event, pdl / brownfield usually comes to the market as windfall development, without the need for an allocation to enable its delivery, unless it is a very large redundant site, such as Winnington, mentioned above, where an allocation assists with a coherent masterplan strategy. Unlike most



unallocated greenfield sites, pdl does not require a lack of five year supply or a Development Plan policy vacuum for it to come forward through the planning system.

To ensure a secure pipeline of housing sites can continue to house the growing population, it is recommended that further greenfield sites are allocated, so that CWaC can continue to benefit from the significant boost in housing numbers which emerges from both brownfield windfall sites *and* edge-of-settlement allocations, which would not otherwise be delivered outside of a plan-led system.

Question SS 5

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

We agree in principle to the settlement hierarchy suggested. It largely follows the sustainable development objectives outline in VII. In particular, Winsford being a Tier 2 “Main Town” is supported, as it has excellent transport links and existing infrastructure, and is entirely unconstrained by Green Belt, in contrast to the other Main Towns of Northwich, Ellesmere Port and the city of Chester. All of these are heavily constrained by the Green Belt, albeit only to the north of Northwich, whereas to the south, Northwich’s growth appears to have almost reached its natural limit at the strong defensible boundary posed by the A556.

The settlements with a level of facilities and services that meet the day-to-day needs of their residents and those living in surrounding areas are also supported for growth. It should be made clear in a future settlement hierarchy, once finalised, that these settlements are capable of supporting moderate development in terms of housing, owing to the level of services present and their transport links to the surrounding area.

Question SS 6

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

Yes. Smaller settlements should have proportional levels of development- affordability is often a significant issue in smaller villages, with many younger families and rural workers unable to afford to own a home in the settlement they grew up or work in. Small scale allocations and windfall development at least proportionate to their natural growth needs should be supported in these locations, particularly where they provide affordable housing.

Question SS 7

Do you think the new Local Plan should contain place-based policies for smaller settlements such as: Cuddington and Sandiway; Farndon; Helsby; Kelsall; Malpas; Tarporley; Tattenhall; and Tarvin?

Yes. In particular, site allocations should be made in these settlements in order to guide development to the most appropriate locations, and to ensure that a proportional level of development in these settlements is planned for.

Question SS 8

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

Development should not exceed the capacity of existing services and infrastructure, unless new services and infrastructure are proposed to be delivered through new development.



Question SS 9

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

Cheshire West housing land supply has been significantly revised, and the council now face a current lack of supply, and a significant target to be achieved through the next Local Plan. With many key settlements heavily constrained by Green Belt, eg. Chester, some Green Belt release may be necessary.

Planning authorities should review and alter their Green Belt boundaries where necessary as part of the plan making process- as set out in national policy and the PPG. As part of this process, authorities should also identify land that could be considered grey belt but, most importantly, prioritise housing land for release that is not constrained by Green Belt, a national designation which continues to successfully serve its original purposes since the 1950s.

Question SS 11

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

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

We believe that Option A is the most appropriate, as it preserves the Green Belt, particularly around Chester and Ellesmere Port.

The NPPF states that the Green Belt serves five purposes:

- (a) to check the unrestricted sprawl of large built-up areas;*
- (b) to prevent neighbouring towns merging into one another;*
- (c) to assist in safeguarding the countryside from encroachment;*
- (d) to preserve the setting and special character of historic towns; and*
- (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

In retaining the current Green Belt boundaries, the setting of Chester- a well known historic town- can be preserved.

Chester and Ellesmere Port are within relatively close proximity to each other, and the land between them is designated Green Belt, serving a key purpose as identified by NPPF paragraph 143(b)- preventing neighbouring towns from merging.

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?

Infill and proportionally scaled brownfield and greenfield development should be supported in settlements not identified in the hierarchy, particularly where they provide a proportion of affordable housing or housing for rural workers and to meet, as a minimum, the natural growth needs of existing residents and their families.



Question SS 14

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

This approach is supported and considered to be the most appropriate option. In focussing development around Winsford, significant housing delivery can be achieved without releasing significant Green Belt land for allocation / development. Settlements not within the Green Belt would also see moderate growth through this strategy and this too is supported.

Question SS 18

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

We believe Growth Option C to be an appropriate option, subject to some modification. This would achieve a more distributed growth pattern throughout the district and leverage the excellent transport links of smaller settlements.

If this policy were to be improved, it should be through the reduction in Green Belt release around Chester and Ellesmere Port, and through an increase in the number of homes delivered in the non-Green Belt settlements of Cuddington and Sandiway, particularly in close proximity to Cuddington railway station; Farndon; Kelsall; Malpas; Tarporley; Tarvin; and Tattenhall. We would suggest increasing the number of houses allocated to these settlements from the ~500 units shown on Map 5.3, to a range of 500-1,000 units, particularly given their inherent sustainability and good public transport links to Chester and Northwich.

Question SS 32

Which of the identified potential growth areas around Winsford do you consider to be the most suitable?

Our client, Muller Property Services Limited has land interests within Winsford, namely within the WIN04 growth area. We are promoting approximately 32 hectares of land for up to 1,000 new dwellings, open space and associated infrastructure.

The Muller interest in particular extends to a total of 79.8 acres (approximately 32.2 hectares), and is broadly level, with the exception of an area across the centre of the site. Firwood Brook runs through the centre of the site, forming a small heavily wooded valley affecting the topography of its immediate surroundings.

Winsford Town Centre is approximately 1 mile to the north of the site and is accessible via public transport through a bus that runs from a stop adjacent to Swanlow Park Cemetery. This is an hourly service and runs to the town centre, providing access to shopping and recreational facilities, as well as rail access to the wider area. This bus route ultimately provides a service between Northwich to the north and Crewe to the south, the latter of which is a regional rail hub.

WIN04 should be considered one of the most suitable growth areas in Cheshire West and Chester, as it is unconstrained by current policy designations, and is not within the Green Belt. Should the growth area be allocated, this would represent a deliverable and sustainable allocation that could be delivered early in the plan period and in further substantial phases as the plan period progresses.

The site was partially assessed in the 2025 CWAC Land Availability Assessment Stage One as site no. 1968 (Swanlow Lane, Winsford). While this assessment only considered a small section of the wider area that forms WIN04 (approx. 8.4 ha.), the assessment considered that the site had suitable residential potential with a capacity for around 220 houses over a net developable area of 6.3 ha.



Question SS 50

Which of the identified potential growth areas around Malpas do you consider to be the most suitable?

MAL01 presents the most logical extension to Malpas, matching the pattern of development already present. The growth area has strong boundaries in the form of Chester Road and the unnamed lane to the east. The site has been assessed in the Council's Land Availability Assessment stage 1 report (published in 2025) which identifies the site under reference: 1700 and indicates that it has "suitable residential potential".

Muller Property Group have land interests within this potential growth location and are seeking to promote a residential scheme of suitable size for Malpas - approximately 130 units over a site measuring approximately 4.3 hectares.

The site is currently within a STRAT 9 designation (Countryside) and development largely restricted to those suitable for rural areas. Unlike similar sites on the Malpas boundary however, MAL01 is not within a natural environment restoration area (Policy DM44, Local Plan Part 2), potentially making delivery more straightforward.

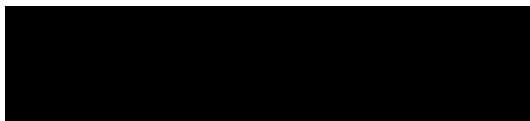
The allocation of MAL01 would provide a sustainable and deliverable site that follows the current development pattern. It would be suitable as an allocation under either of the suggested Spatial Strategies.

Question WI 2

Do you have any comments on the suggested allocations/sites?

Land covered by Potential Growth Area WIN04 should be included within the policy approach as a key allocation. The site is included within all three growth options for Winsford and is a highly sustainable site with residential potential for up to 1,000 homes.

Yours faithfully,



Alex Jones

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Enc.

Site Location Plan- Swanlow Lane, Winsford

Site Location Plan- Chester Road, Malpas

