

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

28 August 2025

Dear Sir or Madam,

## **CONSULTATION ON THE CHESHIRE WEST & CHESTER LOCAL PLAN ISSUES & OPTIONS (REG. 18 STAGE)**

CPRE (formerly the Campaign to Protect Rural England) Cheshire Branch welcomes the opportunity to participate in Cheshire West and Chester's Local Plan 'Issues and Options' consultation.

### **Who are we?**

CPRE is known as 'the countryside charity' because of its work towards achieving a thriving and beautiful countryside for everyone. However, as well as being a member of the Rural Coalition and the Wildlife and Countryside Link, we are also aligned to the 'Smart Growth Coalition' and with sustainable transport bodies. Promoting urban regeneration, sustainable and active travel and more environmentally friendly logistics are also big parts of our work, as are campaigning for affordable housing and against urban sprawl and for 'rooftop solar' and against fracking. Next year we will be celebrating our 100<sup>th</sup> birthday as an organisation. During the time we have existed, we have actively promoted many aspects of the modern planning system e.g. the formation of the Green Belt. With about 400 members in Cheshire (both individuals and organisations) we represent an important community voice in our local branch area.

### **What do we think about the emerging Cheshire West and Chester Local Plan?**

CPRE welcomes the fact that CWaC is reviewing its Local Plan, which will help ensure an up-to-date Plan coverage for the area. We also welcome many aspects of the emerging Plan. However, we also have a number of significant concerns and our comments (both supportive and otherwise) are set out in annex 1 to this letter.

In our response we set out a preference for option A ("retain the Green Belt"). This reflects the important role that the Green Belt should continue to play for example in preventing urban sprawl across the northern part of the Borough and protecting the historic setting of Chester. However, we have significant concerns (applicable to all 3 options) about the level of development which is proposed outside existing urban areas and the resultant harm that is likely to be caused, including to rural areas not protected by Green Belt. In our view every effort must be taken to meet needs for development in a way which protects and enhances the Borough's wonderful countryside.

We accept that the potential housing target of 1,914 dwellings per annum (28,710 over a 15-year Plan period) is derived from the Government's standard method for calculating housing need.

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However, CPRE's view both locally and nationally is that the standard method, due for example to its lack of linkage with evidenced household generation rates and the arbitrary nature of its underpinning formulae is seriously flawed. This is particularly the case in Boroughs such as CWaC where the standard method output is almost double the underlying rate of household formation, resulting in a bloated and unjustified housing target.

We also urge that in meeting development needs the most efficient use must be made of land and existing buildings, for example through the use of a "brownfield first" approach and use of appropriate development densities.

Our comments also range across a number of other important issues, on some of which CPRE nationally has prepared evidence documents and/or campaign materials. These include (for example) the need to:

- Protect and enhance the Borough's important rural and semi-rural landscapes and settlements;
- give greater protection to Best and Most Versatile agricultural land, so that this may continue to fully contribute to the rural economy and nation's food security;
- promote a sustainable transport system which minimises carbon emissions and links effectively with land use planning;
- Protect and enhance biodiversity, tree and hedgerow coverage in line with the emerging Cheshire and Warrington Local Nature Recovery Strategy;
- guide renewable energy proposals to the most sustainable locations and to focus solar power proposals onto existing buildings and previously developed land as a first preference;
- address the housing crisis in a more effective way, for example by ensuring that the size, tenure and type of housing provided (both affordable and market) are appropriate to local needs; and
- Ensure a clear and on-going link to the aspirations of local communities, for example as expressed via the Neighbourhood Plan process.

Further details of our views on these and other issues are set out in annex 1.

We trust this submission will receive due consideration.

Yours faithfully,

**JONATHAN CLARKE**

Chair of CPRE Cheshire Branch

## ANNEX 1 – CPRE CHESHIRE RESPONSE TO CWAC ISSUES AND OPTIONS

QUESTION	CPRE CHESHIRE RESPONSE
<b>INTRODUCTION</b>	
<b>IN 1</b> <b>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?</b>	<p>Whilst the brownfield land register is listed in the evidence base, this crucial data set does not appear to have been fully updated. It is essential that it is updated in full if the new Local Plan is to comply with the National Planning Policy Framework (NPPF) and with the Town and Country Planning (Brownfield Land Register) Regulations 2017.</p> <p>CPRE’s ‘State of brownfield report’ (published in 2022) showed that, nationally, over 1.2 million homes could be built over 23,000 sites covering more than 27,000 hectares of brownfield. Our estimate, based on the available evidence, was that the minimum brownfield housing capacity in the north west was 165,919 (<a href="https://www.cpre.org.uk/resources/state-of-brownfield-report-2022/">https://www.cpre.org.uk/resources/state-of-brownfield-report-2022/</a>).</p> <p>CPRE national has also developed a brownfield register toolkit to help local CPRE branches to interrogate local brownfield registers to ensure they are sufficiently comprehensive. CPRE Cheshire branch has recently recruited a brownfield volunteer and we will be keen to engage with the Council on this important issue as the Local Plan progresses through its next steps.</p>
<b>IN 2</b> <b>Do you have any comments on what the monitoring framework should include?</b>	<p>The monitoring framework should include air quality and river quality. This would be consistent with the CWaC Climate Energy Response Plan for 2025-30, which recognises ‘cleaner water’ and ‘improved air quality’ as key benefits/opportunities of acting on climate change (para. 2.3, page 5).</p>
<b>IN 3</b> <b>Do you have any comments or views on the proposed plan period for the new Local Plan?</b>	<p>It is appropriate that the new Local Plan should look ahead for 15 years. That said, in view of the fact that it is now mandatory for all Local Plans to be reviewed every five years, we assume the Plan may change if necessary, for example to address any changes of circumstances. Whilst the 5-year reviews may be challenging for local authorities to resource, and may lead to some reduced certainty, CPRE Cheshire is broadly happy with this approach.</p>

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<b>IN 4</b> Do you have any comments on the initial SA/SEA that accompanies the Local Plan Issues & Options?	<p>We commend the fact that the Sustainability Appraisal has been rural proofed and trust that the Local Plan itself will be also. Our main criticism would be around the very large number of local evidential reports that are “in preparation” and which therefore are not yet available for scrutiny and analysis.</p> <p>Regarding health, as paragraph 2.16 in the Sustainability Appraisal (page 73) points out <i>“The Ellesmere Port area policy approach (EP 2) is the only policy from the SA that scored negatively on impacts to health”</i>. The reasons for this are identified (the need to deal with hazardous installations) but there is no solid reassurance that this is likely to happen quickly.</p>
<b>IN 5</b> Do you have any comments on the HRA screening that accompanies the Local Plan Issues & Options?	<p>We note that 21 policies, growth areas and growth strategies have been screened in for further investigation under the Habitats Regulation Assessment and are left wondering when these further assessments will be available.</p>
<b>IN 6</b> Do you have any comments on what role Neighbourhood Plans should play in terms of meeting Cheshire West’s development needs and other suggested policy approaches for the new Local Plan? This could include things like meeting housing needs, local government tests or design, etc.	<p>Cheshire West and Chester Council is more familiar than many local authorities with what can be achieved through Neighbourhood Plans. Its Local Development Scheme (May 2025) lists 27 Neighbourhood Development Plans that have been supported at referendum or ‘made’ and 20 that are in preparation, including four which are revisions to previous plans. As neighbourhood planning has developed over the 14 years since being brought in by the Localism Act, the understanding of its potential has increased and so has the quality of the outputs.</p> <p>CPRE, along with the National Association of Local Councils (NALC) is very concerned about the removal of government funding for Neighbourhood Plans. We feel it is a decision at odds with the government’s expressed desire in the English Devolution and Community Engagement Bill to see more meaningful community involvement in decision-making in future. However, Neighbourhood Development Plans still stand as statutory documents alongside Local Plans and the community desires they represent must be taken account of, whether this be on housing need and distribution, building design, important open spaces and the countryside, landscape or climate change.</p>
<b><u>VISION</u></b>	

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<b>VI 1</b> Do you agree with the suggested approach towards the new Local Plan vision, as set out in V1 1 'Vision'? If not, please suggest how it could be amended.	We suggest the following addition to the opening paragraph: <i>"The vision for Cheshire West and Chester is for it to be a desirable, <b>healthy</b> and attractive place ....."</i> .
<b>VI 2</b> Should the vision include/establish a set of principles and priorities? Are these the right ones – do you have any other suggestions?	Yes, it is appropriate that a set of principles is included and we support the 4 principles identified.
<b>VI 3</b> 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?	Individual 'place' visions need to be different from the over-arching vision, and be defined in line with best practice e.g. the Design Council's 'Best Practice Guide to Place Visioning': <a href="https://people-places.net/best-practice-guide-to-place-visioning/">https://people-places.net/best-practice-guide-to-place-visioning/</a> .
OBJECTIVES	
<b>OB 1</b> Please select the option which is the most appropriate 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 – Use the Sustainability Appraisal objectives.
<b>OB 2</b> Do you have any alternative approaches/options that you would like to suggest?	No, we are happy with the Sustainability Appraisal objectives.
<b>OB 3</b> 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' is an appropriate approach?	This is not our preferred approach – see our answer to Issue OB1.
<b>OB 4</b> 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?	No, they do not need to be amended.
<b>OB 5</b> 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	It is comprehensive and appropriate.

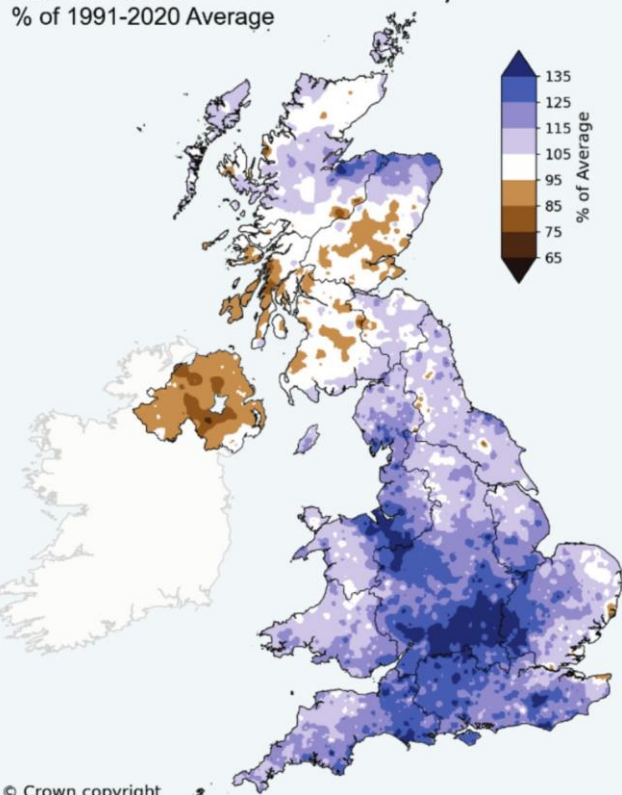
QUESTION	CPRE CHESHIRE RESPONSE
objectives' above, is an appropriate approach?	
OB 6 If you do not feel this is an appropriate approach, are there changes you would suggest?	N/A
<b>4) SUSTAINABLE DEVELOPMENT</b>	
SD 1 Do you agree with the suggested policy approach towards sustainable development as set out in SD 1 'Sustainable Development'? If not please suggest how it could be amended.	CPRE agrees with the suggested approach.
SD 2 Do you have any comments on how feasible district heat networks are? Should district heat networks be a requirement on strategic sites?	District heat networks can be very effective and successful. However, we are aware of an issue regarding consumer costs. There is apparently no regulation governing how much can be charged for the use of heat networks (they do not come within the purview of Ofgem) and this has led to extortionist pricing in some cases. This is an issue that needs to be addressed.
SD 3 Are there any other sustainable development issues or requirements that should be included in the new Local Plan?	<p>There is no specific commitment to protect important landscapes or environmental capital. Excavating minerals and aggregates needs to be kept to a minimum by the re-use of materials wherever possible and by the use of the latest technologies.</p> <p>We are pleased to see that "high grade agricultural land" is given protection under the third bullet of SD1 under "additional environmental and social requirements". However, it needs to be clarified what is meant by "high grade". Grades 1, 2 and 3a are recognised by Natural England as Best and Most Versatile (BMV) land. BMV land is a critical national resource, contributing to the nation's food security. However, research published by CPRE (see <a href="https://www.cpre.org.uk/news/uk-farmland-at-risk-under-system-using-1940s-data-new-report-reveals/">https://www.cpre.org.uk/news/uk-farmland-at-risk-under-system-using-1940s-data-new-report-reveals/</a>) shows that the ALC system has several significant problems that make it increasingly unreliable for modern decision-making. First, the system relies on outdated climate data collected between 1941 to 1980 and, therefore, does not take into account more recent climate change. More up-to-date measurements of temperature and rainfall would be likely to show a dramatic reduction in the amount of high-grade agricultural land available. This means that we may be overestimating the amount of high-grade farmland across the UK. <u>Given the national pressures on this crucial resource, we suggest that SD1 should be changed to (at the very least) give specific protection to land which is confirmed as being BMV.</u></p>
<b>5) SPATIAL STRATEGY</b>	

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<p><b>SS 1</b>    <b>Is there any reason for the Council not to plan for delivering a minimum of 1,914 homes each year?</b></p>	<p>CPRE is aware that local authority minimum housing targets are imposed by central government and are based on a new standard calculation method (which CPRE believes is flawed). In the case of Cheshire West and Chester, their imposed target is now 1,914 homes per year – a total of 28,710 over a 15-year period as stated on page 22 of the consultation document – representing a 260% increase on previous housing growth plans. And, as also explained on page 22, the only way local authorities can hope to lower their housing requirements is if they can make successful, evidenced, arguments about land constraints, protected habitats, flood risk areas and/or the existence of National Parks.</p> <p>CPRE recognises the need to tackle the housing crisis but the new over-arching minimum housing figures imposed for CWaC and many other local authorities make little sense. A fundamental weakness of the Government’s standard method is that it lacks any basis in local demographic data. CPRE is currently looking at this issue nationally with a view to lobbying the Government further on it.</p> <p>In previous years a key “starting point” in identifying a housing target for local authorities has been to look at the household projections for each local authority, published periodically by the Office for National Statistics (ONS). Previous versions of the standard method have done this. Unfortunately, the latest available ONS household projections are still 2018 based, so very dated now. The projections for each district – set out in table 406 - also vary according to which Plan period is assumed, and other factors such as any past under-delivery may need to be taken into account. Despite these reservations however the household projections nevertheless have value as a “sense check” of the proposed target.</p> <p>If one assumes a Plan period of 2027-2042 for CWaC (15 years from CWaC Council’s albeit ambitious adoption date of 2027) the total projected household growth is 15,289 over a 15-year period, or <b>1,019 dwellings</b> on average per annum<sup>1</sup>.</p> <p><b>The current method therefore shows a level of increase (1,914 dwellings per annum) which is</b></p>

<sup>1</sup>The figure of 15,289 is derived by deducting the projected household total for 2027 (158,999) from that for 2042 (174,288) from table 406 available at <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/householdprojectionsforengland>.

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	<p><b>almost double that set out in the ONS projections. Despite the reservations about reliance on the projections (set out above) CPRE considers the standard method output of 1,914 dwellings per annum is likely to be excessive.</b></p> <p>It is also likely that the increased housing target, whilst being used by developers to justify planning permissions on unsuitable greenfield sites, will not actually increase delivery to the extent envisaged. This is due to the current shortage of materials and trained labour and as local authorities and housing associations are not in a financial position to be able to contribute much via direct provision to the type of housing needed. (We note that, in July, the MHCLG named 10 Councils which will be involved in co-designing a £5.5m programme to increase council-led housebuilding, but how this will work is still not clear and the scheme is far from being rolled out across the country). Meanwhile, commercial providers will only ever supply housing which makes them sufficient profit – and at a pace of their own choosing that does not swamp the market.</p> <p>In other words, CPRE fully comprehends the current complex situation and cannot see how the government’s aspiration to provide 1.5 million homes nationally in the period of this parliament is realistic. As far as CW&amp;C is concerned, we acknowledge that national policy substantially constrains the grounds on which the housing targets may be challenged. However, one factor that should be considered is the flood issue due to the rising sea level and increased rainfall and the low-lying nature of the vast majority of the Borough. The current flood risk areas (taking account of both riverine and surface water flooding as identified on the Government’s flood risk map at <a href="https://check-long-term-flood-risk.service.gov.uk/map">https://check-long-term-flood-risk.service.gov.uk/map</a>) are extensive. We would also point to the ‘State of the UK Climate Report for 2024’ which was released in July 2025 by the Met Office (see <a href="https://www.metoffice.gov.uk/about-us/news-and-media/media-centre/weather-and-climate-news/2025/annual-climate-stocktake-shows-weather-records-and-extremes-now-the-norm-in-uk-climate">https://www.metoffice.gov.uk/about-us/news-and-media/media-centre/weather-and-climate-news/2025/annual-climate-stocktake-shows-weather-records-and-extremes-now-the-norm-in-uk-climate</a> and <a href="https://rmets.onlinelibrary.wiley.com/doi/10.1002/joc.70010">https://rmets.onlinelibrary.wiley.com/doi/10.1002/joc.70010</a>). Whilst this just shows rainfall from one year (2024) it is indicative of the rapidly changing and unstable climate which is likely to increase flood risk in the future. See the image below lifted from figure 20 on page 22 of the report:</p>



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	<p><b>Met Office – issued 2024 Rainfall Amount</b>  % of 1991-2020 Average</p>  <p>© Crown copyright</p>
<b>SS 2</b> 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?	This is an almost impossible question for a consultee to answer without being in possession of far more information than is available in the public domain.
<b>SS 3</b> Is there any reason for the Council not to plan for delivering a minimum of 9.9 hectares of employment land each year?	Yes, there is. Even prior to Covid, there was a continuing rise in the amount of home working. During the pandemic, almost half of working adults (49%) reported having worked from home at some point. Since the lockdowns, percentages have fallen, but they are still high and – it is generally acknowledged – likely to remain so. According to the Office for National Statistics, more than a quarter of working adults in Great Britain (28%) were hybrid working between January and

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	March 2025 <sup>2</sup> . Clearly, it is totally inappropriate to continue to plan for previous percentages of land to be allocated for employment. Not only that, there are many under-used existing employment sites that could be partially or wholly turned over to housing or other uses.
<b>SS 4</b> Do you agree with the suggested policy approach towards the spatial strategy principles as set out in SS 3 'Spatial strategy principles'? If not, please suggest how it could be amended.	CPRE can support this policy with the exception of the last two paragraphs. National policies are already placing huge pressures on Green Belt and other countryside areas. There is no need to repeat them here as it will merely encourage more developer pressure to build on such areas. The last sentence should be dropped.
<b>SS 5</b> Do you agree with the suggested policy approach towards the settlement hierarchy as set out in SS 4 'Settlement hierarchy'? If not, please suggest how it could be amended.	We do agree with this policy.
<b>SS 6</b> Should all settlements have some level of development, regardless of whether they are identified in the settlement hierarchy?	It would be not only inappropriate but reckless to make a blanket policy along these lines. We would not support it. Suitable/sustainable development sites must be identified on an individual basis.
<b>SS 7</b> 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?	It would be helpful if they did, but they should be based on local community priorities.
<b>SS 8</b> Do you agree that, in smaller settlements, the character should be protected and developments should not exceed the capacity of existing services and infrastructure?	Yes, we agree.
<b>SS 9</b> Have circumstances changed since the adoption of the Local Plan (Part One) that would justify Green Belt release?	As planners at CW&C will be only too well aware, the government has introduced – through its more recent planning reforms – a new standard method for calculating housing need and the concept of 'Grey Belt'. We have already set out in response to earlier questions the deeply flawed nature of the standard method (QSS1) and the need to fully update the Council's

<sup>2</sup> <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/articles/whohasaccesstohybridworkingreatbritain/2025-06-11>

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	<p>brownfield register. We do not consider that the case for Green Belt release has been demonstrated.</p> <p>According to the current NPPF's definition, any Green Belt site, including previously developed or brownfield land, could be reclassified as Grey Belt, provided it can be shown to 'not strongly contribute' to three of the five Green Belt purposes. But, there are exceptions. These include sites with irreplaceable habitats or which are at risk of flooding. We have flagged up in our response to question Q. SS 1 the growing issue of flood risk in the Borough. This also needs to be taken into account in any decisions about reclassification of land to Grey Belt.</p>
<p><b>SS 10</b> Are there other considerations we should take account of in relation to future Green Belt policy?</p>	<p>Yes. The Council should be doing all it can to relieve the pressure on Green Belt, including tackling the number of empty homes and bringing forward brownfield land. According to government statistics, updated in March this year, Cheshire West and Chester had 2,510 empty homes in 2024 (<a href="https://www.gov.uk/government/statistics/council-taxbase-2024-in-england">https://www.gov.uk/government/statistics/council-taxbase-2024-in-england</a>) and, according to Action on Empty Homes, the number of long term empty homes in the borough is rising – up by 96 to 1,480 in 2024 from 1,384 in 2023 (<a href="https://www.actiononemptyhomes.org/facts-and-figures">https://www.actiononemptyhomes.org/facts-and-figures</a>). Also, CPRE research conducted in 2022 showed that there is space in England for 1.2 million homes on previously developed land (<a href="https://www.cpre.org.uk/resources/state-of-brownfield-report-2022/">https://www.cpre.org.uk/resources/state-of-brownfield-report-2022/</a>). It is absolutely essential, therefore, that CW&amp;C updates its brownfield register and that it carries out master planning exercises in all settlements of any size.</p>
<p><b>SS 11</b> Please select the option that is the most appropriate spatial strategy for Cheshire West and Chester:</p> <p>a. <u>Option A – Retain the Green Belt</u></p> <p>b. Option B – Follow current Local Plan level and distribution of development</p> <p>c. Option C – Sustainable transport corridors</p> <p>d. None of these.</p>	<p>Of the options presented we favour Option A - Retain the Green Belt. However, we have concerns even about this option due to its reliance on the flawed standard method for calculating housing need, and the resultant risk that further harmful development would occur in other important countryside areas which are not protected as Green Belt.</p>
<p><b>SS 12</b> Do you have any alternative spatial strategy options that you would like to suggest?</p>	<p>Cheshire West and Chester has a significant border with Liverpool City Region. It should explore whether that region can accept any of its housing allocation – in addition to lobbying the government to reduce its housing figures. See our response to Q. SS 1.</p>
<p><b>SS 13</b> Aside from those settlements identified in the spatial</p>	<p>The amount of development that CW&amp;C is being forced to contemplate due to the government's</p>

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<p>strategy options, should new housing or other development be allowed in other settlements? If so, specify what type of development., e.g. infill.</p>	<p>new housing targets is already too high and brings with it too many environmental implications. As much new development as possible should be carried out as infill and also there needs to be an allowance for windfalls. In addition, as pointed out in response to Q. SS 3, there will be areas currently allocated for employment use (existing and new ones) which could be turned over to housing due to the growth in home working. However, no further development should be allowed within the period of the new Local Plan over and above that which the Council is obliged to accept.</p>
<p><b>SS 14</b> Do you feel that Option A is an appropriate spatial strategy for the new Local Plan?</p>	<p>All options offered present difficult choices for different reasons. However, Green Belt principles must prevail if they are to mean anything at all.</p>
<p><b>SS15</b> If you do not feel that Option A is an appropriate spatial strategy option, are there any changes that you would suggest?</p>	<p>N/A</p>
<p><b>SS 16</b> Do you feel the Option B is an appropriate spatial strategy for the new Local Plan?</p>	<p>No</p>
<p><b>SS 17</b> If you do not feel that Option B is an appropriate spatial strategy option, could you suggest changes?</p>	<p>This would be our second-choice option because of the amount of Green Belt release that is proposed. But, if this option is chosen, we would again emphasise the need for an updated brownfield register and would ask that new land is designated as Green Belt to compensate for Green Belt lost.</p>
<p><b>SS 18</b> Do you feel that Option C is an appropriate spatial strategy for the new Local Plan?</p>	<p>No. This would be the least sustainable option because it would create urban sprawl along transport corridors and it would focus inappropriate development around some rural and semi-rural stations – all of which are in or abut Green Belt. CPRE are well aware the DfT has signalled that development around railway stations is appropriate – and, no doubt, there are many urban locations where it is – but there are numerous rural stations, especially those in Green Belt, where it is not appropriate.</p>
<p><b>SS 19</b> If you do not feel that Option C is an appropriate spatial strategy option, could you suggest changes?</p>	<p>There is no way this option could be made sustainable. It should not receive further consideration.</p>
<p><b>SS 20</b> Do you think that the potential ‘showstopper’ constraints identified are correct? Are there others?</p>	<p>They are not correct. Whilst we agree with the “showstoppers” which have been identified, we are concerned about the exclusion of Green Belt. ‘Landscapes’ are also not specifically mentioned (other than the Areas of Special County Value, the boundaries of which have yet to be defined in the new Local Plan) and there is an on-going need to review ‘areas of flood risk’ to take account of climate change. Also, we would like there to be a strong presumption against the loss</p>

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	<p>of Best and Most Versatile Agricultural land. The definition of BMV land should use in the first instance Natural England's ALC map (<a href="https://publications.naturalengland.org.uk/publication/144015?category=5954148537204736">https://publications.naturalengland.org.uk/publication/144015?category=5954148537204736</a>) but should also include intrusive site investigation for any potentially BMV sites being considered for development, in line with Natural England guidance.</p>
<p><b>SS 21</b> What information should we take into account when assessing sites for allocation in the Local Plan?</p>	<ul style="list-style-type: none"> <li>• An updated brownfield register</li> <li>• Green Belt, especially those pockets making a major or significant contribution to GB purposes</li> <li>• Areas of Special County Value</li> <li>• Natural England's NW Region agricultural land classification map (referenced in response to Q. SS 20) supported where necessary by on-site investigation.</li> <li>• Important historic &amp; landscape features, trails &amp; woodlands (Cheshire has less than 5% of tree cover)</li> <li>• Flood risk zones</li> <li>• Areas with poor air quality.</li> </ul>
<p><b>SS 22</b> 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?</p>	<p>CPRE urge the Council to produce master plans for all the significant settlements and to give Green Belt the status it deserves. See our response to Q. SS 20. However, if the Council does proceed with declassifying any Green Belt, it should newly classify the same area of land as Green Belt elsewhere.</p>
<p><b>SS 23</b> Which of the identified potential growth areas around Chester do you consider most suitable?</p>	<p>There should be no development on Green Belt or high-quality agricultural land.</p>
<p><b>SS 24</b> Do you have any further comments about any of the potential growth areas around Chester?</p>	<p>The city should not be allowed to sprawl into the countryside. Before developing potential 'growth' areas 'around' the city, areas in need of regeneration within it should be redeveloped.</p>
<p><b>SS 25</b> Are there any constraints, including infrastructure provision, that should be considered for Chester when developing the new Local Plan?</p>	<p>The surrounding Green Belt plus Grade Two agricultural land in the north west and to the south east. Any areas which are marked as grade 2 or 3 farmland on the Natural England map (and which therefore may be BMV – see our response to SS20) should be subject to detailed site survey (i.e. not just desk-based) carried out in accordance with Natural England guidance to</p>

QUESTION	CPRE CHESHIRE RESPONSE
	inform any decisions about future development.
<b>SS 26 Which of the identified potential growth areas around Ellesmere Port do you consider to be the most suitable?</b>	There should be no development on Green Belt or best quality agricultural land.
<b>SS 27 Do you have any further comments about any of the potential growth areas identified around Ellesmere Port?</b>	Before developing potential ‘growth’ areas ‘around’ Ellesmere Port, areas in need of regeneration within it should be redeveloped.
<b>SS 28 Are there any constraints, including infrastructure provision, that should be considered for Ellesmere Port when developing the new Local Plan?</b>	Green Belt and a sliver of Grade Two agricultural land immediately to the west of the built area. Any areas which are marked as grade 2 or 3 farmland on the Natural England map (and which therefore may be BMV – see our response to SS20) should be subject to detailed site survey (i.e. not just desk-based) carried out in accordance with Natural England guidance to inform any decisions about future development.
<b>SS 29 Which of the identified potential growth areas around Northwich do you consider to be the most suitable?</b>	There should be no development on Green Belt or best quality agricultural land.
<b>SS 30 Do you have any further comments about any of the potential growth areas identified around Northwich?</b>	The Northwich Neighbourhood Plan identified that there were significant areas of the town suitable for regeneration and where new development could be located on previously developed land ( <a href="https://www.northwichtowncouncil.gov.uk/northwich-neighbourhood-plan/">https://www.northwichtowncouncil.gov.uk/northwich-neighbourhood-plan/</a> ).
<b>SS 31 Are there any constraints, including infrastructure provision, that should be considered for Northwich when developing the new Local Plan?</b>	Green Belt and slivers of Grade Two agricultural land to the north west, west and south. Any areas which are marked as grade 2 or 3 farmland on the Natural England map (and which therefore may be BMV – see our response to SS20) should be subject to detailed site survey (i.e. not just desk-based) carried out in accordance with Natural England guidance to inform any decisions about future development.
<b>SS 32 Which of the identified potential growth areas around Winsford do you consider to be the most suitable?</b>	The adopted Winsford Neighbourhood Plan sets out where it is appropriate for development to go and it illustrates where the flood plain is ( <a href="https://winsford.gov.uk/policies/">https://winsford.gov.uk/policies/</a> ).
<b>SS 33 Do you have any further comments about any of the potential growth areas identified around Winsford?</b>	Before developing potential ‘growth’ areas ‘around’ Winsford, areas in need of regeneration within it should be redeveloped – and there should be no building on best quality agricultural land.

QUESTION	CPRE CHESHIRE RESPONSE
<b>SS 34</b> Are there any constraints, including infrastructure provision, that should be considered for Winsford when developing the new Local Plan?	<p>The flood plain and a small area of Grade Two agricultural land to the north east. Any areas which are marked as grade 2 or 3 farmland on the Natural England map (and which therefore may be BMV – see our response to SS20) should be subject to detailed site survey (i.e. not just desk-based) carried out in accordance with Natural England guidance to inform any decisions about future development.</p>
<b>SS 35</b> Which of the identified potential growth areas around Cuddington and Sandiway do you consider to be the most suitable?	<p>There should be no development on Green Belt and the Cuddington Neighbourhood Plan – which wants to see any development focused on previously developed land and infill sites – must be respected (<a href="https://cuddingtonandsandiwayonline.org/local-councils/76-neighbourhood-plan-reg15">https://cuddingtonandsandiwayonline.org/local-councils/76-neighbourhood-plan-reg15</a>).</p>
<b>SS 36</b> Do you have any further comments about the potential growth areas identified around Cuddington and Sandiway when developing the new Local Plan?	<p>The adopted Neighbourhood Plan emphasises that only small-scale development in stipulated areas should be permitted.</p>
<b>SS 37</b> Are there any constraints, including infrastructure provision, that should be considered for Cuddington and Sandiway?	<p>Green Belt. In addition, any areas which are marked as grade 2 or 3 farmland on the Natural England map (and which therefore may be BMV – see our response to SS20) should be subject to detailed site survey (i.e. not just desk-based) carried out in accordance with Natural England guidance to inform any decisions about future development.</p>
<b>SS 38</b> Which of the identified potential growth areas around Farndon do you consider to be the most suitable?	<p>The adopted Farndon Neighbourhood Plan does not allocate any specific development sites. It eschews small scale development and points out the extent of the recognised flood plain in the area (<a href="http://www.farndonparishcouncil.co.uk/?page_id=168">http://www.farndonparishcouncil.co.uk/?page_id=168</a>).</p>
<b>SS 39</b> Do you have any further comments about any of the potential growth areas around Farndon?	<p>There should be no building on the flood plain or on best quality agricultural land.</p>
<b>SS 40</b> Are there any constraints, including infrastructure provision, that should be considered for Farndon when developing the new Local Plan?	<p>The flood plain and a significant swathe of Grade Two agricultural land to the north west. Any areas which are marked as grade 2 or 3 farmland on the Natural England map (and which therefore may be BMV – see our response to SS20) should be subject to detailed site survey (i.e. not just desk-based) carried out in accordance with Natural England guidance to inform any decisions about future development.</p>

QUESTION	CPRE CHESHIRE RESPONSE
SS 41 Which of the identified potential growth areas around Frodsham do you consider to be the most suitable?	The Frodsham Neighbourhood Plan was only ‘made’ as recently as November last year and must be respected. Based on a masterplan developed by AECOM, it identifies six sites, within the settlement boundary, for development ( <a href="https://frodshamplan.org.uk/">https://frodshamplan.org.uk/</a> ).
SS 42 Do you have any further comments about any of the potential growth areas identified around Frodsham?	There should be no building on Green Belt or best quality farmland (e.g. the swathe of Grade Two agricultural land to the east and south east).
SS 43 Are there any constraints, including infrastructure provision, that should be considered for Frodsham when developing the new Local Plan?	Green Belt, Frodsham Marshes to the north, the Sandstone Ridge to the west and Grade Two agricultural land to the east. Any areas which are marked as grade 2 or 3 farmland on the Natural England map (and which therefore may be BMV – see our response to SS20) should be subject to detailed site survey (i.e. not just desk-based) carried out in accordance with Natural England guidance to inform any decisions about future development.
SS 44 Which of the identified potential growth areas around Helsby do you consider to be the most suitable?	The Helsby Neighbourhood Plan identified areas within the settlement boundary and also endorsed very limited development of affordable housing only in the Green Belt ( <a href="https://www.helsbyparishcouncil.gov.uk/the-council/helsby-neighbourhood-plan/">https://www.helsbyparishcouncil.gov.uk/the-council/helsby-neighbourhood-plan/</a> ).
SS 45 Do you have any further comments about any of the potential growth areas identified around Helsby?	There should be no development on Green Belt or on high grade agricultural land.
SS 46 Are there any constraints, including infrastructure provision, that should be considered for Helsby when developing the new Local Plan?	Green Belt, Helsby Marsh to the north and north west, Grade Two agricultural land to the north east, Helsby Hill and Harmers Wood to the south east and the Sandstone Trail to the east. Any areas which are marked as grade 2 or 3 farmland on the Natural England map (and which therefore may be BMV – see our response to SS20) should be subject to detailed site survey (i.e. not just desk-based) carried out in accordance with Natural England guidance to inform any decisions about future development.
SS 47 Which of the identified potential growth areas around Kelsall do you consider to be the most suitable?	Due cognisance should be given to the Kelsall and Willington Neighbourhood Plan which, amongst other things, defines an important gap between Kelsall and the hamlet of Willington. At the time the Neighbourhood Plan was written, the expectation was that there would be a need to plan for around 200 houses. The policies are aimed at coping with this level of allocation ( <a href="https://www.kelsall-pc.org.uk/planning/neighbourhood-plan.html">https://www.kelsall-pc.org.uk/planning/neighbourhood-plan.html</a> ).
SS 48 Do you have any further comments about any of the potential growth areas identified around Kelsall?	There should be no development on Green Belt or best quality agricultural land or in woodland.



QUESTION	CPRE CHESHIRE RESPONSE
<b>SS 49</b> Are there any constraints, including infrastructure provision, that should be considered for Kelsall when developing the new Local Plan?	<p>Green Belt, Delamere Forest, the Sandstone Trail and Eddisbury Hill to the east and Grade Two agricultural land to the west and south. Any areas which are marked as grade 2 or 3 farmland on the Natural England map (and which therefore may be BMV – see our response to SS20) should be subject to detailed site survey (i.e. not just desk-based) carried out in accordance with Natural England guidance to inform any decisions about future development.</p>
<b>SS 50</b> Which of the identified potential growth area around Malpas do you consider to be the most suitable?	<p>Malpas has an existing Neighbourhood Plan (covering Malpas and Overton) and is well advanced in producing a revision to it, having produced a consultation statement in June this year. Both must be taken fully into consideration (<a href="https://www.malpasparishcouncil.org.uk/neighbourhood-plan.html">https://www.malpasparishcouncil.org.uk/neighbourhood-plan.html</a>).</p>
<b>SS 51</b> Do you have any further comments about any of the potential growth areas identified around Malpas?	<p>There should be no building on best grade agricultural land.</p>
<b>SS 52</b> Are there any constraints, including infrastructure provision, that should be considered for Malpas when developing the new Local Plan?	<p>The Sandstone Ridge and Roman road on which Malpas sits and the Sandstone Trail to the east and the Bishop Bennet Way that runs west-east across the south of the settlement. Also, the significant areas of Grade Two agricultural land to the west, north west, north and north east and Cholmondeley Castle and its historic parkland and gardens to the north east. Any areas which are marked as grade 2 or 3 farmland on the Natural England map (and which therefore may be BMV – see our response to SS20) should be subject to detailed site survey (i.e. not just desk-based) carried out in accordance with Natural England guidance to inform any decisions about future development.</p>
<b>SS 53</b> Which of the identified potential growth areas around Neston and Parkgate do you consider to be the most suitable?	<p>Neston and Parkgate are closely defined by the Green Belt and the Dee Estuary and the Neston Neighbourhood Plan relies heavily on that fact, only condoning Green Belt development where special circumstances can be proved and preferably only for affordable housing (<a href="https://neston.org.uk/council/neighbourhood-plan/">https://neston.org.uk/council/neighbourhood-plan/</a>).</p>
<b>SS 54</b> Do you have any further comments about any of the potential growth areas identified around Neston and Parkgate?	<p>There should be no development in Green Belt.</p>
<b>SS 55</b> Are there any constraints, including infrastructure provision, that should be considered for Neston and	<p>The Green Belt, the salt marshes of the Dee Estuary and the Sandstone Ridge that Neston sits on.</p>

QUESTION	CPRE CHESHIRE RESPONSE
<b>Parkgate when developing the new Local Plan?</b>	In addition, any areas which are marked as grade 2 or 3 farmland on the Natural England map (and which therefore may be BMV – see our response to SS20) should be subject to detailed site survey (i.e. not just desk-based) carried out in accordance with Natural England guidance to inform any decisions about future development.
<b>SS 56 Which of the identified potential growth areas around Tarporley do you consider to be the most suitable?</b>	The Tarporley Neighbourhood Plan, the boundaries for which were revised last year, should be fully taken into account ( <a href="https://www.tarporley.org.uk/tarporley-parish-council/neighbourhood-plan/">https://www.tarporley.org.uk/tarporley-parish-council/neighbourhood-plan/</a> ).
<b>SS 57 Do you have any further comments about any of the potential growth areas around Tarporley?</b>	There should be no building on high grade agricultural land.
<b>SS 58 Are there any constraints, including infrastructure provision, that should be considered for Tarporley when developing the new Local Plan?</b>	The southern Sandstone Ridge and Sandstone Trail to the west and Grade Two agricultural land to the north east and east. Any areas which are marked as grade 2 or 3 farmland on the Natural England map (and which therefore may be BMV – see our response to SS20) should be subject to detailed site survey (i.e. not just desk-based) carried out in accordance with Natural England guidance to inform any decisions about future development.
<b>SS 59 Which of the identified potential growth areas around Tarvin do you consider to be the most suitable?</b>	The Tarvin Neighbourhood Plan must be taken into consideration. It only condones infill development within the settlement ( <a href="https://tarvinpc.tarvinonline.org/your-parish/neighbourhood-plan.html">https://tarvinpc.tarvinonline.org/your-parish/neighbourhood-plan.html</a> ).
<b>SS 60 Do you have any further comments about any of the potential growth areas around Tarvin?</b>	There should be no building on Green Belt or high-grade agricultural land. The housing allocations proposed are on Green Belt and the mixed-use allocation adjoins it.
<b>SS 61 Are there any constraints, including infrastructure provision, that should be considered for Tarvin when developing the new Local Plan?</b>	Green Belt to north west and west and significant swathes of Grade Two agricultural land to the north west, north east and south. Any areas which are marked as grade 2 or 3 farmland on the Natural England map (and which therefore may be BMV – see our response to SS20) should be subject to detailed site survey (i.e. not just desk-based) carried out in accordance with Natural England guidance to inform any decisions about future development.
<b>SS 62 Which of the identified potential growth areas around Tattenhall do you consider to be the most suitable?</b>	The Tattenhall Neighbourhood Plan, currently being renewed, must be taken account of. It supports small scale development ( <a href="https://tattenhallpc.co.uk/the-parish-council/the-">https://tattenhallpc.co.uk/the-parish-council/the-</a>

QUESTION	CPRE CHESHIRE RESPONSE
	<u>neighbourhood-plan/</u> ).
<b>SS 63</b> Do you have any further comments about any of the potential growth areas identified around Tattenhall?	There should be no building on best grade agricultural land.
<b>SS 64</b> Are there any constraints, including infrastructure provision, that should be considered for Tattenhall when developing the new Local Plan?	Grade Two agricultural land to the south west and the Sandstone Trail and Peckforton Hills to the east. Any areas which are marked as grade 2 or 3 farmland on the Natural England map (and which therefore may be BMV – see our response to SS20) should be subject to detailed site survey (i.e. not just desk-based) carried out in accordance with Natural England guidance to inform any decisions about future development.
<b>SS 65</b> Which of the identified potential growth areas around Acton Bridge station do you consider to be the most sustainable?	The area around Acton Bridge station is Green Belt. The area should not be built up.
<b>SS 66</b> Do you have any further comments about any of the potential growth areas identified around Acton Bridge station?	Green Belt should not be built on.
<b>SS 67</b> Are there any constraints, including infrastructure provision, that should be considered for the area around Acton Bridge station when developing the new Local Plan?	Green Belt – and the allocated sites would almost connect up with and double the size of Weaverham.
<b>SS 68</b> Which of the identified potential growth areas around Capenhurst station do you consider to be the most suitable?	Capenhurst station is in Green Belt. The area should not be built up.
<b>SS 69</b> Do you have any further comments about any of the potential growth areas identified around Capenhurst station?	Green Belt should not be built on.
<b>SS 70</b> Are there any constraints, including infrastructure provision, that should be considered for the area around Capenhurst station when developing the new Local Plan?	Green Belt and also the North Cheshire Way cuts through the site. Any areas which are marked as grade 2 or 3 farmland on the Natural England map (and which therefore may be BMV – see our response to SS20) should be subject to detailed site survey (i.e. not just desk-based) carried out in accordance with Natural England guidance to inform any decisions about future development.

QUESTION	CPRE CHESHIRE RESPONSE
<b>SS 71</b> Which of the identified growth areas around Delamere station do you consider to be the most suitable?	Delamere station is in Green Belt and, even more importantly, it is situated in the heart of Delamere Forest, Cheshire's largest woodland. The area around it should not be compromised with inappropriate development.
<b>SS 72</b> Do you have any further comments about any of the potential growth areas identified around Delamere station?	Green Belt should not be built on and the rural setting of this award-winning station should not be compromised. This is the least sustainable of all the development proposals based around rural rail stations. Apart from which, it would undoubtedly compromise the attractiveness of the area and therefore affect the tourist economy.
<b>SS 73</b> Are there any constraints, including infrastructure provision, that should be considered for the area around Delamere station when developing the new Local Plan?	Green Belt and Delamere Forest (managed by the Forestry Commission) which is a haven for wildlife. It should also be recognised that, according to the Wildlife Trust, Cheshire is one of the least wooded areas in the country. And, according to CW&C's own Tree and Woodland Strategy, the woodland cover across the borough is 4% - well below the national average of 10%. CW&C cannot afford to lose any. Any areas which are marked as grade 2 or 3 farmland on the Natural England map (and which therefore may be BMV – see our response to SS20) should be subject to detailed site survey (i.e. not just desk-based) carried out in accordance with Natural England guidance to inform any decisions about future development.
<b>SS 74</b> Which of the identified potential growth areas around Elton station do you consider to be the most suitable?	Elton station is in Green Belt. The area around it should not be built up.
<b>SS 75</b> Do you have any further comments about any of the potential growth areas identified around Elton station?	Green Belt should not be built on.
<b>SS 76</b> Are there any constraints, including infrastructure provision, that should be considered for the area around Elton station when developing the new Local Plan?	Green Belt and Ince Marshes. Any areas which are marked as grade 2 or 3 farmland on the Natural England map (and which therefore may be BMV – see our response to SS20) should be subject to detailed site survey (i.e. not just desk-based) carried out in accordance with Natural England guidance to inform any decisions about future development.
<b>SS 77</b> Which of the identified potential growth areas around Hooton station do you consider to be the most suitable?	Hooton station is in Green Belt. The area around it should not be built up, especially as the rest of the Ellesmere Port area is so heavily developed and industrialised. Ellesmere Port desperately needs to retain what little open green space it has.
<b>SS 78</b> Do you have any further comments about any of the potential growth areas identified around Hooton station?	Green Belt should not be built on. Also, this development proposal would effectively join up the settlements of Willaston and Hooton.

QUESTION	CPRE CHESHIRE RESPONSE
<b>SS 79</b> Are there any constraints, including infrastructure provision, that should be considered for the area around Hooton station when developing the new Local Plan?	Green Belt and the proximity of the flood plain.
<b>SS 80</b> Which of the identified potential growth areas around Lostock Gralam station do you consider to be the most suitable?	Green Belt abuts Lostock Gralam station to the north. The area should not be built up.
<b>SS 81</b> Do you have any further comments about any of the potential growth areas identified around Lostock Gralam station?	Green Belt should not be built on.
<b>SS 82</b> Are there any constraints, including infrastructure provision, that should be considered for the area around Lostock Gralam station when developing the new Local Plan?	Green Belt. Any areas which are marked as grade 2 or 3 farmland on the Natural England map (and which therefore may be BMV – see our response to SS20) should be subject to detailed site survey (i.e. not just desk-based) carried out in accordance with Natural England guidance to inform any decisions about future development.
<b>SS 83</b> Which of the identified potential growth areas around Mouldsworth station do you consider the most suitable?	Mouldsworth station is in Green Belt. The area around it should not be built up.
<b>SS 84</b> Do you have any further comments about any of the potential growth areas identified around Mouldsworth station?	Green Belt should not be built on.
<b>SS 85</b> Are there any constraints, including infrastructure provision, that should be considered for the area around Mouldsworth station when developing the new Local Plan?	Green Belt. Any areas which are marked as grade 2 or 3 farmland on the Natural England map (and which therefore may be BMV – see our response to SS20) should be subject to detailed site survey (i.e. not just desk-based) carried out in accordance with Natural England guidance to inform any decisions about future development.
<b>6) CHESTER</b>	
<b>CH 1</b> Do you agree with the suggested policy approach towards Chester as set out in CH1 Chester? If not please suggest how it could be amended.	<p>CPRE opposed the allocation of Chester Business Park and opposed its extension – because of its Green Belt setting outside of the city confines. That point made, the business park exists and therefore the site needs to be made best use of. Part of it could potentially be re-allocated for other purposes.</p> <p>We also agree with the suggestion that part of Chester Business Quarter could/should be</p>

QUESTION	CPRE CHESHIRE RESPONSE
	<p>allocated for apartment accommodation. It would be an excellent way of fulfilling housing targets.</p> <p>We do not support the suggestion of a fifth park and ride site – at Hoole or anywhere else. There are many negative aspects from P &amp; R schemes including the fact that they can create extra traffic movements. People living between them and town/city centres often drive out to the sites to obtain free parking and take advantage of free or cheap trips into the urban centres. It is also not uncommon for motorists to drive around from one site to another if the first one or two they encounter are full. In addition, the P and R sites often lead to the diminution of commercial bus services which cannot compete with the free or cheap services that run regularly between the sites and the city centres.</p> <p>Meanwhile there are further impacts on local air quality, soils (from run-off), character and landscape (more often than not, P &amp; Rs are constructed on green spaces/ Green Belt). Park-and-ride is far from the solution to town centre congestion it was originally claimed to be. It is far more environmentally friendly to have universal good quality public transport services that encourage people to do their whole journey without using private cars, not just the last few miles.</p> <p>We also do not support “a relief road for the west of the city” (page 84, second bullet on the page), an idea which has been mooted for a long time. Quite apart from the fact that providing more road space merely encourages more trips by car and only provides short term relief, in this case it would involve constructing a new bridge over the Dee and building on a flood plain. It would also involve taking yet more Green Belt. It makes little sense to focus effort and spending in this direction rather than on providing reliable low-carbon public transport and high-quality active travel networks when there is such a desperate need to tackle the climate crisis.</p>
<b>CH 2</b> Do you have any comments on the suggested allocations/ sites?	We approve of the Chester City Gateway plan. There does not appear to be a detailed plan yet for the Dale Barracks site but we would approve, in principle, the idea of it being used primarily for housing.
<b>CH 3</b> Do you have any views on how the aspirations of the One City Plan and Chester Gateway Regeneration Framework should be reflected through the new Local	We can wholeheartedly endorse the promise in the Foreword to the One City Plan by the leader of CW&C, to “ <i>use the United Nations Sustainable Development Goals</i> ”. We also note that, when

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<p><b>Plan?</b></p>	<p>the plan was revised following extensive consultations “<i>Sustainability emerged as an overarching theme</i>” and we welcome the resulting commitment for the Council to prioritise the three pillars of sustainability. Also, as we subscribe to the aims of the Smart Growth Coalition, which include focusing development on urban areas, we can endorse the Council’s promise to continue to invest in regeneration schemes.</p> <p>The Chester Gateway Scheme appears to be primarily about regeneration in favour of providing affordable accommodation and sustainable travel options, primarily for younger people. This we can also wholeheartedly support.</p>
<p><b>CH 4 Are there any infrastructure requirements required to support the suggested policy approach set out in CH 1 Chester?</b></p>	<p>We are not in a position to comment knowledgeably on this but would hope that where housing allocations are made, attention is given to ensuring the adequate provision for health and educational needs is made as well as sustainable transport options.</p>
<p><b>CH 5 Should the approach to public car parks and parking requirements in the city centre and surrounding area be amended to support new development?</b></p>	<p>CPRE does not advocate substantial parking provision because it encourages the use of the car. We advocate instead a sustainable transport hierarchy. See annex 2 to this submission and our transport policy on the national website: <a href="https://www.cpre.org.uk/resources/cpre-transport-policy/">https://www.cpre.org.uk/resources/cpre-transport-policy/</a>.</p>
<p><b>CH 6 Should the new Local Plan continue to allocate Chester Business Quarter for high quality office uses? If not, how can new office development in Chester be provided?</b></p>	<p>See our detailed answer to Q. SS 3 which charts the rise of home working. The demand for office space is falling. Some of the Chester Business Quarter should be allocated for apartments.</p>
<p><b>CH 7 Do you agree with the approach to Chester Business Park?</b></p>	<p>We agree that it would not be sustainable to allow housing on this site because, unless people happened to work on the site, they would have to travel (by car) to work and all would have to travel for all other needs in any event.</p>
<p><b>CH 8 Should there be a more flexible approach to uses supported within Chester Business Park?</b></p>	<p>Yes.</p>
<p><b>CH 9 Is the current policy approach to the University of Chester in current Local Plan (Part Two) policy CH4 still appropriate?</b></p>	<p>The policy appears to stand the test of time. That said, we wonder whether Chester Business Park might be a suitable location for the university’s business faculty.</p>

QUESTION	CPRE CHESHIRE RESPONSE
<p><b>CH 10</b> Should the policy approach in relation to protecting the historic importance of Chester, including the setting of the city and strategic open space, archaeology, Chester conservation area, key views, landmarks and gateways and historic skyline remain unchanged?</p>	<p>The policy is still relevant. We would point to the examiner's report into the current Local Plan (Part 1), referenced at the end of proposed policy SS 5. This policy summarises the examiner's conclusion: <i>"that additional release of Green Belt around Chester would have a significant adverse effect on the purposes of including land within the Green Belt, including the historic setting, and that the amended Green Belt boundary proposed was capable of enduring and would not need to be altered at the end of the plan period (2030)"</i>.</p>
<p><b>7) ELLESMERE PORT</b></p>	
<p><b>EP 1</b> Do you agree with the suggested policy approach towards Ellesmere Port as set out in EP 1 Ellesmere Port? If not, please suggest how it could be amended.</p>	<p>We support the majority of this policy but not the suggestion that Green Belt boundaries may be amended (under the side heading of 'Urenco and Capenhurst Technology Park').</p>
<p><b>EP 2</b> Do you have any comments on the use of previously developed land within Ellesmere Port?</p>	<p>CPRE totally supports making maximum use of previously developed land because land is a finite resource.</p>
<p><b>EP 3</b> Do you agree with the suggested policy approach towards Origin – Stanlow and Thornton Science Park as set out in EP 2 'Origin - Stanlow and Thornton Science Park'? If not, suggest how it could be amended.</p>	<p>Yes, we support this.</p>
<p><b>EP 4</b> Do you have any comments on the use of previously developed land within Origin – Stanlow and Thornton Science Park?</p>	<p>Yes, we support this.</p>
<p><b>EP 5</b> Do you agree with the suggested policy approach towards Origin – Protos as set out in EP 3 'Origin – Protos'? If not please suggest how it could be amended.</p>	<p>Yes, we support this.</p>
<p><b>EP 6</b> Do you agree with safeguarding Origin – Protos for resource recovery and waste, reducing carbon emissions and sustainable energy generation?</p>	<p>Yes.</p>



QUESTION	CPRE CHESHIRE RESPONSE
<b>EP 7</b> Do you agree with safeguarding the level of consented waste capacity on specific plots at Origin – Protos (see also section 29 ‘Managing waste’)?	Yes.
<b>EP 8</b> Do you have any comments on the use of previously developed land within Origin – Protos?	We are taking at face value everything that is said about this area as we have no on-the-ground experience of it.
<b>8) NORTHWICH</b>	
<b>NO 1</b> Do you agree with the suggested policy approach towards Northwich as set out in NO 1 ‘Northwich’? If not, please suggest how it could be amended.	Yes
<b>NO 2</b> Do you have any comments on the suggested key allocations/ sites?	CPRE does not believe that a sustainable way forward is to plan for ever more and ever bigger logistics and warehousing centres. There are alternatives including smaller centres with appropriate sustainable localised deliveries. We therefore do not support the plans for Gadbrook Park which would draw even more polluting HGVs along the A556 and other corridors. Some of the existing Gadbrook area and the planned expansion of it should be reallocated for housing.
<b>NO 3</b> Do you have any views on how the aspirations of the Northwich Town Centre Development Framework should be reflected through the new Local Plan?	CPRE are in favour of urban regeneration. This should remain the key focus in order to take pressure off the Green Belt.
<b>NO 4</b> Are there any infrastructure requirements required to support the suggested policy approach?	If part of the Gadbrook site and/or the south west extension to it were turned over to residential use, there would need to be appropriate educational and health support facilities and possibly also a local retail centre as well as leisure areas.
<b>NO 5</b> Should the settlements that make up the wider Northwich urban area be retained?	Yes.
<b>NO 6</b> Should the policy approach to protecting the local historic character of the town centre and the surrounding area remain unchanged?	It seems apposite.
<b>NO 7</b> Do you agree with the suggested policy approach towards Gadbrook Park as set out in NO 2 ‘Gadbrook	No. As indicated in response to Q.NO 2 and Q.NO4, we do not believe that Northwich is a sustainable location for a sizeable logistics and warehouse distribution operation. In any event,

QUESTION	CPRE CHESHIRE RESPONSE
<b>Park’?</b>	we note that the existing Gadbrook site has many vacancies.
<b>NO8 Should there be a more flexible approach to uses supported within Gadbrook Park?</b>	Yes. It would be more logical for an appropriate area of the existing site and part or all of the proposed extension to it to be re-dedicated to residential use to help accommodate the extra housing allocation that Cheshire West and Chester has found itself having to cope with as a result of imposed government targets.
<b>9) WINSFORD</b>	
<b>WI 1 Do you agree with the suggested policy approach towards Winsford as set out in W1 ‘Winsford’? If not, please suggest how it could be amended.</b>	We welcome the focus on regenerating the town centre, improved accessibility to the railway station and to The Flashes and the River Weaver. Potential proposals for other sites beyond the key allocations listed are subject to our comments about the overall Spatial Strategy and housing target.
<b>WI 2 Do you have any comments on the suggested allocations/ sites?</b>	No
<b>WI 3 Do you have any views on how the aspirations of the Winsford Development Framework should be reflected through the new Local Plan?</b>	Regenerating the town centre core of Winsford should be central to the policy for Winsford.
<b>WI 4 Are there any infrastructure requirements required to support the suggested policy approach?</b>	No comments.
<b>WI 5 Do you agree with the suggested policy approach towards Winsford Industrial Estate as set out in WI 2 ‘Winsford Industrial Estate’? If not, please suggest how it could be amended.</b>	We have concerns about the continued growth of road-based logistics in the additional growth areas around the east and north of Winsford Industrial estate. Any growth in road-based logistics must be kept to a minimum in the interests of reducing road movements and carbon emissions and based on regional and sub-regional needs assessments taking account for example of the scope for demand management and modal shift to rail based movement.
<b>10) FRODSHAM</b>	
<b>FR 1 Do you agree with the suggested policy approach towards Frodsham as set out in FR 1. If not, please suggest how it could be amended.</b>	We support the identification of Frodsham as a market town in the settlement hierarchy and the need to protect the appearance, setting and character of the Frodsham Hills Area of Special County Value. Any proposals for Green Belt release should be resisted in line with our earlier comments about the Spatial Strategy. The reference to protecting the nearby habitats sites alongside the Mersey should be strengthened to reflect their international importance and the need to protect important supporting habitat in nearby areas e.g. feeding areas for wintering

QUESTION	CPRE CHESHIRE RESPONSE
	birds.
<b>11) NESTON AND PARKGATE</b>	
<b>NE 1</b> Do you agree with the suggested policy approach towards Neston and Parkgate as set out in NP 1 'Neston and Parkgate'?	We support the identification of Neston and Parkgate as a market town in the settlement hierarchy and the need to protect the appearance, setting and character of the Dee Coastal Area of Special County Value. Any proposals for Green Belt release should be resisted in line with our earlier comments about the Spatial Strategy. The reference to protecting the nearby habitats sites alongside the Mersey and Dee should be strengthened to reflect their international importance and the need to protect important supporting habitat in nearby areas e.g. feeding areas for wintering birds.
<b>NE 2</b> What should be the policy approach for Leahurst which meets Leahurst's needs and provides positive links with Neston and Parkgate?	The policy for Leahurst should ensure that development does not harm the openness and purposes of the surrounding Green Belt.
<b>12) MIDDLEWICH</b>	
<b>MI 1</b> Do you agree with the suggested policy approach towards Middlewich as set out in MI 1 'Middlewich'? If not, please suggest how it could be amended.	It needs to be clearer what is meant by "pragmatic approach" to meeting development needs. Given the cross-boundary issues identified, any proposals for future development affecting Middlewich must be informed by wholistic evidence spanning the 2 authority areas. In future, the anticipated Cheshire and Warrington Mayoral authority will also play a role in addressing cross boundary issues such as this.
<b>MI 2</b> What issues should be considered through the Cheshire West and Chester Local Plan to ensure the future needs of Middlewich are properly considered.	See our answer to Q MI2 above.
<b>MI 3</b> With the Cheshire West and Chester Local Plans currently on different timelines, how can any potential future needs for Middlewich be met?	Through cooperation between the 2 authorities, for example on relevant evidence base.
<b>MI 4</b> Could land be safeguarded to be released for development	Only if justified by relevant evidence.
<b>MI 5</b> 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?	We have concerns about the sites suggested which would encroach onto countryside areas, and in a random and unplanned fashion looking at the range of different sites put forward.
<b>13) GREEN BELT AND COUNTRYSIDE</b>	

QUESTION	CPRE CHESHIRE RESPONSE
<b>GB 1</b> Do you agree with the suggested policy approach towards Green Belt and countryside as set out in GB 1 'Green Belt and countryside'? If not, please suggest how it could be amended.	<p>As set out in our response to Q SS11, our favoured strategic option is option A to “retain the Green Belt”. However, irrespective of which spatial option is chosen and due in large part to the Government’s flawed standard methodology for calculating housing needs and policies on “grey belt” there is a significant risk that harmful development will nevertheless come forward in both Green Belt and other countryside areas. The policies for protecting the Green Belt and other countryside areas therefore need to be as strong as possible. We strongly agree that “rural character” should be protected for its own sake and there should be a strong link here to the policies on landscape.</p>
<b>GB 2</b> Should there be a separate policy for countryside and Green Belt areas?	<p>It doesn’t really matter. What matters is the policy content – see our response to Q GB 1 above.</p>
<b>GB 3</b> Are any other uses appropriate in the countryside that should be reflected in the policy?	<p>It is not very clear what other uses the Council has in mind here. If it is to cover for example equestrian uses (currently covered by another policy) or indeed any other forms of development this should be subject to criteria governing the scale and impact on the landscape, light pollution, vehicular traffic generation etc.</p>
<b>GB 4</b> Should the policy limit redevelopment to that of the same use and other policy compliant redevelopment?	<p>This question is not very clear. Redevelopment of existing rural buildings for other uses (eg small scale employment uses) can be appropriate but again this is subject to its visual, noise and other impacts e.g. on the viability of farm holdings.</p>
<b>GB 5</b> How else can rural buildings/ rural character be protected to prevent new development harming the intrinsic character through ‘urbanising’ the countryside?	<p>No comments.</p>
<b><u>14) TRANSPORT AND ACCESSIBILITY</u></b>	
<b>TA 1</b> Do you agree with the suggested policy approach towards transport and accessibility as set out in TA 1 'Transport and accessibility'? If not, please suggest how it could be amended.	<p>We strongly agree with the need to locate new development where it is accessible by a range of transport modes and support the sustainable transport hierarchy, which is similar to CPRE’s own version – see annex 2 to our comments. The hierarchy in the Plan should however include (at its top) avoiding the need to travel at all for example through improved digital connectivity. In addition, whilst it is fine to say “new development will be encouraged in more sustainable locations” it should be made clearer that development which is not in such locations will be refused. There should be clarity about the criteria that development will be expected to satisfy to meet this requirement e.g. through the setting of maximum safe walking and cycling distances to</p>

QUESTION	CPRE CHESHIRE RESPONSE
	<p>shops, public transport and other community facilities.</p> <p>We support in principle the safeguarding of disused railway lines, sidings and stations for future transport use and also strongly support the need to extend and improve local footpath and cycle networks, including greenways, canal towpaths and public rights of way.</p> <p>We note that the Council intends to take a “flexible approach” when reviewing its Parking Standards SPD which “adapts to the varying levels of non-car connectivity across the borough”. We are cautious about what this may mean in practice as parking standards need to be carefully calibrated to ensure that they do not encourage or facilitate further car dependency.</p>
<b>TA 2</b> Should we include a policy which takes a hierarchical approach in terms of prioritising transport infrastructure?	<p>Yes. The approach to transport infrastructure provision should be designed to ensure that there is an on-going shift towards more sustainable forms of transport (e.g. walking, cycling and public transport) in line with CPRE’s transport hierarchy – see annex 2 to these comments.</p>
<b>TA 3</b> Are there any schemes listed in TA 2 ‘Key local transport infrastructure priorities’ that should be retained, modified or deleted?	<p>Yes. The reintroduction of passenger services on the Sandbach Northwich line, all the schemes listed under T3 “railway stations” and T4 “railway corridors” should be retained. The road schemes listed should be dropped unless there is a critical road safety case to be made for them.</p> <p>We support in principle the safeguarding of land for a new station at Gadbrook Park. Whilst we have concerns about the future expansion of employment uses here, a new station would also help provide access to the existing site.</p> <p>CPRE Cheshire also strongly supports the retention and further improvement of the 12 recreational routes listed under DM37 “recreational routeways” (Shropshire Union Canal, Delamere Loop, Sandstone Trail etc.).</p>
<b>TA 4</b> Are there any other transport schemes that should be included?	<p>No</p>
<b>15) INFRASTRUCTURE AND DEVELOPER CONTRIBUTIONS</b>	
<b>ID 1</b> Do you agree with the suggested policy approach towards infrastructure and developer contributions, as set out in ID 1 ‘Infrastructure and developer contributions’? If not, please suggest how it could be	<p>Yes. We support for example the inclusion of contributions towards educational needs and also greater protections for rural community infrastructure e.g. village halls and community centres.</p>

QUESTION		CPRE CHESHIRE RESPONSE
	amended.	
ID 2	Should developer contributions only apply to major developments? How should 'major development' be defined?	No. There may be situations for example in smaller rural communities where most individual development proposals are of a smaller scale but where there is a cumulative need to fund associated infrastructure needs e.g. school places.
ID 3	Do you agree that developers/ operators should pay the full cost of infrastructure required to deliver their sites?	Yes, to a degree which is proportional to the scale and requirements generated by the development.
ID 4	In the event of viability being an issue, how could the new Local Plan prioritise the provision of infrastructure across the borough and/or on a settlement-by-settlement basis?	There is no easy answer to this. The policy should recognise however that local infrastructure priorities will vary from settlement to settlement.
<b>16) ECONOMIC GROWTH, EMPLOYMENT AND ENTERPRISE</b>		
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'? If not, please suggest how it could be amended.	No, the policy should be more supportive of proposals to redevelop disused employment land for housing. Former industrial sites can form a valuable source of brownfield land to help meet housing needs, which can thereby help reduce pressure for housing in the countryside. The 4 bullet points under the heading "protection of employment land and premises" should therefore be redrafted to follow a more balanced approach, in which the relative benefits of bringing a site forward for housing can be weighed against those of keeping it for employment use. The last of the 4 bullets in particular seems to set a stricter test for redevelopment proposals than is set out in the National Planning Policy Framework (para. 127).
EG 2	Do you agree these are the key strategic employment locations that need to be protected? Are there any others to be added?	We do not support the proposals relating to Gadbrook Business Park. See our comments on Q NO2.
EG 3	Should established employment areas, to meet a range of sizes and types of business/industry needs, be designated on the policies map? If so, should this include the full range of areas identified in the Employment Areas Survey 2024?	We do not object to existing employment areas being designated, so long as there is sufficient flexibility over proposals for redevelopment where appropriate for housing – see our comments on Q EG1.
EG 4	Should the policy approach safeguard out of town office locations for office use or take a more flexible approach?	Offices should preferably be located in town centres where they can be accessed by a choice of sustainable transport and contribute to town centre vitality. We do not support safeguarding of out-of-town offices as a more flexible approach should be followed, allowing redevelopment for

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	other uses e.g. housing where this brings greater planning benefits.
<b>EG 5</b> Do you agree with the suggested policy approach towards the protection of employment land or premises?	No – see our comments in relation to Q EG1.
<b>EG 6</b> Do you agree with the suggested policy approach towards local labour and skills?	Yes.
<b>17) TOWN CENTRES</b>	
<b>TC 1</b> Do you agree with the suggested policy approach towards town centres as set out in TC 1 ‘Town Centres’? If not, please suggest how it could be amended.	In broad terms, yes. We support the diversification of uses within town and district centres to help ensure their future viability, provided that important local shopping and other services are still provided. Such diversification can include more housing (often at higher densities), to relieve pressure for housing development on greenfield sites. The policy should recognise the important function that individual village shops can play in rural communities, as important community assets which help avoid the need for people to travel by car to buy everyday items.
<b>TC 2</b> Do you agree with requiring consideration of previously developed sites within the catchment of the proposal, or available and suitable sites that have a main town centre use permission as part of the sequential test?	Yes
<b>TC 3</b> Do you agree with retaining the centre hierarchy?	Yes
<b>TC 4</b> Do you agree with our suggested approach to small scale rural development?	Yes
<b>18) VISITOR ECONOMY</b>	
<b>VE 1</b> Do you agree with the suggested policy approach towards the visitor economy as set out in VE 1 ‘Visitor Economy’? If not, please suggest how it could be amended.	In broad terms, yes. However, there should be a stronger approach to controlling the landscape and other impacts that visitor attractions can have. All visitor attractions (including any revisions to the existing sites listed in the policy – Chester Zoo, Oulton Park – as well as any new attractions) should be located and designed to avoid or minimise harm to the landscape, light pollution, biodiversity, traffic generation etc.
<b>VE 2</b> Do you agree with aligning the policy approach for the visitor economy, tourism, and leisure with the suggested approach for town centres in TC1 ‘Town centres’?	Yes

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<b>VE 3</b> Do you agree with the suggested policy approach towards rural tourism and leisure, including visitor accommodation policies (caravans and campaign sites) in the country?	See our response to Q VE1.
<b>VE 4</b> Should a site-specific policy be considered for any other significant visitor attractions? Please provide your reasons.	No comments.
<b>VE 5</b> Does the suggested policy approach support a prosperous rural economy whilst maintaining the character of the countryside?	See our response to Q VE1.
<b>19) HOUSING</b>	
<b>HO 1</b> 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'? If not, please suggest how it could be amended.	<p>In broad terms, yes. CPRE agrees that the mix and type of housing must be informed by a housing needs assessment. However, the policy must be robustly drafted to ensure that the mix of house sizes provided reflects the mix that is needed, and to avoid any tendency for developers to skew delivery towards the larger dwelling types, which tend to be built at lower, more "land hungry" densities.</p> <p>Information from the 2021 Census indicates that 68.8% of households in England were living in under-occupied dwellings (with one or more spare bedrooms)<sup>3</sup>. Whilst a degree of under-occupation can be expected given people's expectations of having spare bedrooms to accommodate guests etc., there are likely to be many households e.g. people in their 70s and 80s who may be struggling to cope in a large family home where the occupier would like to move into a smaller dwelling. Allowing for this down-sizing will help address social care needs as well as free up existing larger housing for families which need it. This is of interest to CPRE as it would facilitate more efficient use of the existing housing stock and hence reduce pressures for yet more housing estates in countryside areas.</p> <p>For these reasons, we support the provision of specialist accommodation for the elderly provided this is in accessible areas close to a range of facilities.</p>
<b>HO 2</b> Should the housing mix and type and specialist housing be delivered through a percentage policy	Yes.

<sup>3</sup> See <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/articles/overcrowdingandunderoccupancybyhouseholdcharacteristicsenglandandwales/census2021>



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approach that sets requirements for each category of housing?	
<b>HO 3</b> Do you agree with the approach to student accommodation and should additional consideration be given to the University of Liverpool Leahurst campus?	We support the provision of student accommodation in suitable locations, as this can help free up existing housing to meet more general housing needs. Any proposals affecting the Leahurst campus would need to be considered in the light of their impact on the surrounding area.
<b>HO 4</b> Do you agree with the suggested policy approach towards delivering affordable housing as set out in HO 2 ‘Delivering affordable housing’? If not, please suggest how it could be amended?	We broadly support the approach, but consider that it needs to be sharpened to fully address affordable housing needs. Research by CPRE nationally has stressed the depth of the crisis of housing affordability faced by people living in rural areas – see for example <a href="https://www.cpre.org.uk/explainer/our-rural-affordable-housing-campaign-explained/">https://www.cpre.org.uk/explainer/our-rural-affordable-housing-campaign-explained/</a> . One of the problems relates to the need to specify more clearly what is meant by “affordable”. The definition in annex 2 of the NPPF includes a wide range of categories including for example housing that is delivered at up to 80% of market rates, which will still be unaffordable for many people. For this reason, policy approach HO2 should specify minimum amounts of the different types of affordable housing needed, which will be likely to include “social rent”, which is more tightly defined. A minimum level of social rented housing is likely to be required, linked to the housing needs assessment.
<b>HO 5</b> Do you have any views on thresholds for affordable housing in relation to applying a lower threshold for designated rural areas and what approach could be taken to parts of the borough not subject to designation?	Yes. We agree that a lower threshold of three or more dwellings should be applied in designated rural areas. The areas which are designated should be reviewed if relevant evidence e.g. the proposed housing needs assessment justifies this.
<b>HO 6</b> Do you agree with the suggested policy approach for residential development proposals as set out in HO 3 ‘Proposals for residential development’? If not, please suggest how it could be amended.	Yes
<b>HO 7</b> Are Local Plan (Part Two) policies DM 19, DM 21 and DM 222 working effectively, remain relevant, or are all issues covered by current national policy and guidance?	Yes, in principle we support the retention of these policies.
<b>HO 8</b> Within this policy approach (or elsewhere) should the new Local Plan set out more detail on what development is appropriate in the Green Belt with	Yes

QUESTION	CPRE CHESHIRE RESPONSE
respect to, for example, house extensions, what is small scale/subordinate (not increasing the size of a dwelling by more than 30%) etc?	
<b>HO 9</b> Are there any local/borough specific issues e.g. intensification of garden development, infill or back-land development, change of use to garages to residential, that justify additional/continuation of policy?	Possibly, we recommend that the Council considers all made and emerging neighbourhood plans to pick up any specific local issues in their area, and for areas without a neighbourhood plan to be reviewed to identify the need for locally specific policy of this type.
<b>HO 10</b> Should living over shops be included in a new/amended policy?	Yes. Appropriately designed proposals for living over the shop can provide a valuable addition to housing supply and also improving the levels of activity and hence viability of town, district and local centres.
<b>HO 11</b> Do you agree with the suggested policy approach towards essential rural workers dwellings as set out in HO 4 'Essential rural workers dwellings'? If not, please suggest how it could be amended.	Yes. However, we would welcome strengthening of Policy DM25 clause 5 to make it clearer that over-sized dwellings which are much larger than the functional requirement will not be allowed.
<b>HO12</b> How can it be ensured that if the use ceases the property can meet affordable housing needs?	Through conditions and/or section 106 agreements.
<b>HO 13</b> Would it be useful for elements of the Council's Rural Workers Dwellings – Advice Note to be added to the policy approach? Please specify which elements.	This advice note should at the very least be retained (and specifically referred to in the policy) to enable adequate control over this type of development.
<b>HO 14</b> If a policy for community-led housing is required, what should it include and do you agree that the Local Plan should not increase the maximum size limit for these developments as set out in national guidance?	No comments.
<b>HO 15</b> Do you agree with the suggested policy approach towards rural exception sites as set out in HO 5 'Rural exception sites'? If not, please suggest how it could be amended.	Yes. We support the need for schemes to be generally modest in scale, in keeping with the form and character of the settlement and in line with a robust housing needs assessment. We would also stress the need for such schemes to be developed in close consultation with any relevant local Parish and/or Town Council.
<b>HO 16</b> Should the policy approach to rural exception sites continue to apply to all identified smaller settlements or just those in more remote areas of the borough?	We cannot see why it would not apply to all smaller settlements, but subject to criteria such as those we identify in our answer to Q HO15.

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<b>HO 17</b> Should market housing still be allowed through the policy on rural exception schemes?	Only where this is clearly justified by robust and independent viability evidence, kept to a minimum level and where the overall benefits of the scheme clearly over-ride any planning harm.
<b>HO 18</b> Do you agree with the suggested policy approach towards Houses in Multiple Occupation as set out in HO 6 ‘Houses in Multiple Occupation’? If not, please suggest how it could be amended.	No comment.
<b>20) GYPSY AND TRAVELLER AND TRAVELLING SHOWPERSONS ACCOMMODATION</b>	
<b>GT 1</b> Do you agree with the suggested policy approach towards Gypsy and Traveller and Travelling Showpersons accommodation as set out in GT 1 ‘Gypsy and Traveller and Travelling Showpersons accommodation’? If not, please suggest how it could be amended.	Yes
<b>GT 2</b> If sufficient sites cannot be identified in settlements, should the new Local Plan prioritise non-Green Belt/ grey belt locations?	Yes. Gypsy and traveller sites should not be allowed in the Green Belt (including “grey belt”).
<b>GT 3</b> Given the small scale of traveller sites, should sustainability tests be reduced so sites can be located away from identified settlements?	No.
<b>GT 4</b> Should pitches/plots be required on large scale residential/housing sites or allocations?	Potentially, as such sites are likely to be more suitable than provision in the open countryside or Green Belt.
<b>GT 5</b> If required as part of allocations or through policy, is the threshold of four pitches for every 500 dwellings appropriate?	This should be considered in the light of the GT need assessment which is yet to be published.
<b>GT 6</b> In relation to policy criteria for guiding the allocation of sites, are there any locally specific issues that should be included in a policy?	Not that we are aware of.
<b>GT 7</b> Are there any areas of land you would like to put forward for allocation as a Traveller site? If yes,	No

QUESTION	CPRE CHESHIRE RESPONSE
please provide details.	
<b><u>21) HEALTH AND WELLBEING</u></b>	
<b>HW 1</b> Do you agree with the suggested policy approach towards health and wellbeing as set out in HW 1 'Health and wellbeing'? If not, please suggest how it could be amended.	In broad terms yes. The policy should specifically reference the health benefits of having access to the countryside, for example through public rights of way and bridleways and of having access to nature, in line with the emerging Cheshire and Warrington Local Nature Recovery Strategy.
<b>HW 2</b> Do you have any thoughts on the threshold of the health impact assessment requirement?	No
<b>HW 3</b> Should we consider reviewing the separation distances between facing windows of main habitable rooms as set out in current Local Plan (Part Two) policy DM 2 Impact on residential amenity and include them in a policy in the new Local Plan?	No comment.
<b>HW 4</b> What is an appropriate quantity of outdoor amenity space to be provided in new developments? What approach should we apply to apartments/flats?	No comment.
<b>HW 5</b> Would it be useful for elements of the Council's Hot food takeaway guidance note 2023 to be added to the policy approach? Please specify which elements.	No comment.
<b><u>22) OPEN SPACE, SPORT, RECREATION AND COMMUNITY FACILITIES</u></b>	
<b>OS 1</b> Do you agree with the suggested policy approach towards open space, sport and recreation as set out in OAS 1 'Open space, sport and recreation'? If not, please suggest how it could be amended.	Yes. We strongly support for example the need to protect and enhance the network of recreational routes in the countryside, and for strategic routes to be included on the Policies Map.
<b>OS 2</b> Are the current thresholds for developer contributions for open space and playing pitches suitable or do you have any comments or suggestions for what they should be?	No comment.
<b>OS 3</b> Is the current evidence sufficient or does it require updating (Open Space Study and Playing Pitch Strategy)?	The Open Space Study (2016-2030) is now somewhat dated and is likely to require reviewing for example to ensure that the standards within it remain up-to-date.
<b>OS 4</b> Should the policy approach be more flexible in the order provision of open space in new developments?	No comment.

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If yes, do you have any suggestions how this could be achieved?	
<b>OS 5</b> Do you agree with the suggested policy approach towards cultural and community facilities as set out in OS 2 'Cultural and community facilities'? If not, please suggest how it could be amended.	Yes.
<b><u>23) FLOOD RISK AND WATER MANAGEMENT</u></b>	
<b>FW 1</b> Do you agree with the suggested policy approach towards flood risk and water management as set out in FW 1 'Flood risk and water management'? If not, please suggest how it could be amended.	Yes, subject to our point about Q FW4 below.
<b>FW 2</b> Should the SuDs element of the suggested policy approach include a requirement for nature-based solutions to maximise multifunctional benefits?	Yes
<b>FW 3</b> Should new areas of flood storage be identified and designated?	Yes, if justified by the emerging flood risk evidence.
<b>FW 4</b> How should the new Local Plan address any potential future impacts on water quality, supply or waste water infrastructure?	In some parts of the country (e.g. the Wye Valley) CPRE branches have become increasingly concerned about the impact of concentrations of intensive farming e.g. poultry units on the river catchment water quality. This is due to run off of ammonia, phosphates etc. both from the sites and from associated waste management measures. The policy should aim to address this risk in the relevant river catchments in CWaC, and also any impacts that could arise for the internationally important habitats in and around the Dee and Mersey Estuaries.
<b><u>24) LANDSCAPE</u></b>	
<b>LA 1</b> Do you agree with the suggested policy approach towards landscape as set out in LA1 'Landscape'? If not, please suggest how it could be amended.	We broadly support this policy approach subject to the points raised below on Qs LA2 to LA5.
<b>LA 2</b> Should the key settlement gaps currently defined in Local Plan (Part Two) policy GBC 3 be reviewed? Could they be expanded and/or should new key settlement gaps be identified in the Green Belt or other areas to help protect the character of settlements?	<p>Yes. Policy GBC 3 at present lists a very selective range of areas as key settlement gaps. It is likely that other areas would also benefit from this designation eg between Moulton and Winsford or Winsford and Middlewich.</p> <p>Key settlement gaps within the Green Belt should also be identified. This is particularly important given the role of settlement gap policy in the context of the Government's policy on grey belt.</p>

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	<p>Whilst CPRE Cheshire fundamentally disagrees with Government policy towards “grey belt”, having clearly defined strategic gaps between towns (for the purpose of applying paragraph 143b) and other relevant parts of the NPPF) may go some way to limiting the damage caused.</p> <p>A further important point is that Green Belt policy (paragraph 143b of the NPPF) only relates to gaps between “towns”. There are likely to be parts of the Borough’s Green Belt which separate smaller settlements from each other, or which separate a town from a smaller settlement, where it is nevertheless important to maintain separation from a landscape/townscape point of view.</p> <p>The policy should make it clear that cumulative effects of smaller scale developments (which do not individually close or fill a gap) will also be considered.</p>
<b>LA 3</b> In advance of any formal designation of national landscape, how should the Local Plan deal with it?	CPRE Cheshire was disappointed to learn in summer 2025 that Natural England has decided to pause work on the potential National Landscape designation. Whilst this decision is regrettable the policy approach needs to be updated to reflect this reality.
<b>LA 4</b> Do you agree with the suggested policy approach towards landscape as set out in LA 2 ‘Areas of Special County Value’? If not, please suggest how it could be amended.	Yes. We strongly support the retention of ASCVs as set out in LA2. The decision to pause work on the National Landscape designation means that it is even more important that effective local designations are in place, covering both the Cheshire Sandstone Ridge and other areas of landscape value.
<b>LA 5</b> Should the Areas of Special County Value currently defined in Local Plan (Part Two) policy GBC 2 be reviewed and updated?	Only if there is clear evidence e.g. in a recent landscape character appraisal to justify this.
<b><u>25) GREEN INFRASTRUCTURE, BIODIVERSITY AND GEODIVERSITY</u></b>	
<b>GI 1</b> Do you agree with the suggested policy approach toward green infrastructure, biodiversity and geodiversity as set out in GI 1 ‘Green infrastructure, biodiversity and geodiversity’? If not, please suggest how it could be amended.	<p>Yes we broadly support the approach. We strongly support the references to the Local Nature Recovery Strategy and the need to protect and enhance green infrastructure e.g. trees, hedgerows, peatland, greenspaces etc.</p> <p>The policy should make it clear that proposals leading to the loss of best and most versatile agricultural land will not be permitted where areas of lower grade land are available, either on a single site or split into smaller sites. Even then any planning benefits from the proposal would need to be weighed against the harm resulting from the loss of the farmland. Any areas which</p>

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	are marked as grade 1, 2 or 3 farm land on the Natural England map (and which therefore may be BMV – see our response to SS20) should be subject to detailed site survey (i.e. not just desk-based) carried out in accordance with Natural England guidance to inform any decisions about future development.
<b>GI 2</b> Should new development contribute to woodland in Cheshire West and Chester? Is a 2.1 ratio enough for a tree replacement policy?	Yes. However, the 2.1 ratio is too low given the risks of planting failure. How could replacing a mature tree with 2 saplings possibly replace the biodiversity that has been destroyed? The impact on nature, climate cooling and pollinators should be assessed in every case and the right level of mitigation applied. It can take 20 years for a tree to grow to the point of sequestering carbon to any extent. We therefore suggest mitigation with appropriate new trees and/or areas of woodland for the size of the development and a truly independent ecological assessment.
<b>GI 3</b> Should new Local Plan policy go above the 10% mandatory biodiversity net gain set nationally?	Yes, although viability evidence may be needed and any resultant benefits balanced against any planning harms e.g. to the delivery of affordable housing contributions.
<b>GI 4</b> What could the new Local Plan do to support the Mersey Forest?	By ensuring development is consistent with the objectives of the Mersey Forest Plan, protecting existing tree coverage and requiring new and/or replacement planting.
<b>GI 5</b> Should functionally linked land be covered in the new Local Plan?	Yes.
<b><u>26) HISTORIC ENVIRONMENT</u></b>	
<b>HI 1</b> Do you agree with the suggested policy approach towards the historic environment as set out in HE 1 ‘Historic environment’? If not, please suggest how it could be amended.	Yes.
<b><u>27) DESIGN AND SUSTAINABLE CONSTRUCTION</u></b>	
<b>DS 1</b> Do you agree with the suggested policy approach towards high quality design as set out in DS 1 ‘High quality design’? If not, please suggest how it might be amended.	In broad terms, yes – subject to the points on DS 2 etc. below.
<b>DS 2</b> If the Council produces a borough-wide Design Code, should this form part of the new Local Plan?	It would probably be more practicable to have it as a free-standing document, referred to in the Local Plan, but which could be more easily updated.
<b>DS 3</b> What should the Council’s approach be to the	The Area of Special Control should be kept. However, on the subject of advertisements CPRE

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<b>designated Areas of Special Control of Advertisements?</b>	Cheshire has made complaints to CWaC and Cheshire East Councils about the rash of unsightly adverts on lorry trailers and similar structures parked in fields alongside the M6. This form of advertisement is unacceptable and should be specifically discouraged either in this or another policy.
<b>DS 4 Do you agree with the suggested policy approach towards sustainable construction as set out in DS 2 ‘Sustainable construction’? If not, please suggest how it could be amended.</b>	CPRE is pleased to note the Government’s intention to require provision of solar panels on new homes in its Future Homes Standard. A cross reference to this and/or equivalent provision should be made in Policy DS2.
<b>DS 5 Do you think that the new Local Plan should adopt the National Design Guide energy hierarchy – or is there an alternative?</b>	Yes
<b>DS 6 Do you think that the new Local Plan should set a higher local standard beyond the building regulations requirements to achieve net zero carbon in all new developments?</b>	Yes, subject to balancing against other requirements where viability is an issue eg affordable housing.
<b>DS 7 Do you have any comments on the suggested policy requirements: 1. Energy efficiency, 2. Efficient fossil-free and renewable energy supply, 3. Carbon/energy offsetting, 4. Embodied carbon or 5. Water efficiency – the type and size of development they should apply to or the targets that should be met?</b>	No. We support these policy requirements.
<b>DS 8 Do you think that the new Local Plan policy should offer an alternative route to compliance if the development achieves a recognisable industry standard/ certification?</b>	No comment
<b>DS 9 Do you have any comments on the type and size of development that the alternative compliance should apply to, or any alternative suggestions for the level and type of certification that could be required. For example, BREEAM Carbon Standard, RIBA 2020 Climate Challenge of UK Net Zero Carbon Buildings Standard?</b>	No comment
<b>DS 10 Do you agree with the suggested policy approach towards climate change adaptation as set out in</b>	Yes, we agree with the approach.



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DS3 'Climate adaptation'. If not, please suggest how it could be amended.	
<b>28) ENERGY</b>	
<b>EN 1</b> Do you agree with the suggested policy approach towards energy set out in En 1 'Energy supplies and energy related developments'? If not, please suggest how it could be amended.	We broadly support the policy. CPRE recognises the potential benefits of low carbon energy development but is concerned about the potential impact of ground mounted solar schemes and wind power projects on the landscape and stock of high-quality agricultural land in the Borough. It is vital that the policy clauses related to these matters are robust and link effectively with other policies e.g. on landscape protection, Areas of Special County Value, and protection of Best and Most Versatile Agricultural land.
<b>EN 2</b> How can food production be protected by ensuring the continued viability of farm holdings?	The impact on farm viability must be assessed and given significant weight in the consideration of planning applications.
<b>EN 3</b> Do you agree with the suggested policy approach towards energy as set out in EN 2 'Wind energy'? If not, please suggest how it could be amended.	We broadly support the policy. See our concerns about wind development under our response to Q EN1. It is vital that wind energy developments of anything greater than the smallest scale should be directed away from sensitive landscapes, particularly given the visual prominence of some of these landscapes (e.g. along the Sandstone Ridge) and the high levels of intervisibility with surrounding areas.
<b>EN 4</b> Do you agree with the suggested policy approach towards energy as set out in EN 3 'Solar energy'? If not, please suggest how it could be amended.	We broadly support the policy, subject to our concerns about ground mounted solar farm development under our response to Q EN1. It is vital that "solar farm" developments of anything greater than the smallest scale should be directed away from sensitive landscapes, particularly given the visual prominence of some of these landscapes (e.g. along the Sandstone Ridge) and the high levels of intervisibility with surrounding areas. CPRE nationally has been promoting a "rooftop revolution" in which solar panels are located as a first preference on rooftops rather than taking up valuable farmland (see further details at <a href="https://www.cpre.org.uk/rooftop-solar/">https://www.cpre.org.uk/rooftop-solar/</a> ). The CWaC Local Plan should develop its policies in line with this campaign.
<b>EN 5</b> Do you agree with the suggested approach towards energy as set out in EN4 'Sustainable energy and heat'? If not, please suggest how it could be amended.	Yes, we support this policy.
<b>EN 6</b> Do you agree with the suggested policy approach towards energy as set out in EN 5 'Low carbon fuel and carbon capture'? If not, please suggest how it	Yes, we support this policy.

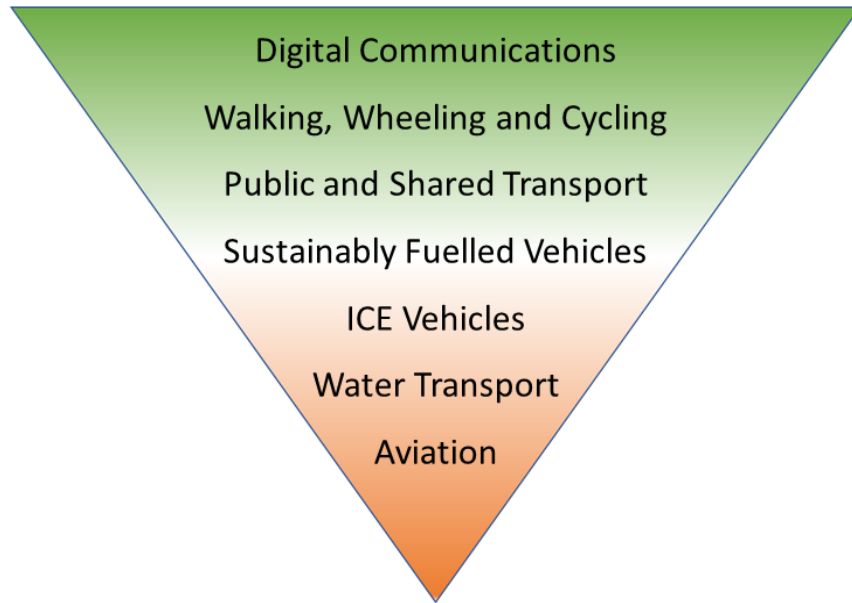
QUESTION	CPRE CHESHIRE RESPONSE
could be amended.	
<b>29) MANAGING WASTE</b>	
<b>MW 1</b> Do you agree with the suggested policy approach towards managing waste as set out on MW 1 'Managing Waste'? If not, please suggest how it can be amended.	Yes. We support the waste hierarchy which encourages as a first priority the minimisation of waste, followed by re-use and recycling over and above disposal.
<b>MW 2</b> The Waste Needs Assessment (2023) identifies that there is sufficient waste management capacity in existing sites and sites with planning permission to meet projected requirements up to 2045 (apart from landfill). However, we are not proposing to limit waste management development or prevent future developments due to lack of 'need' as there will be waste flows between authority areas. And new proposals for waste development would be assessed on their own merits against the criteria identified above. Do you agree with this approach? Please provide reasons for your answer.	No comment.
<b>MW 3</b> We do not currently have an operational landfill site within Cheshire West and we are not proposing to allocate a site for landfill. Do you agree with this approach? Please give reasons for your answer.	We welcome the decision not to allocate a site for landfill. Landfill represents one of the least sustainable ways to manage waste and can effectively sterilise the potential of sites for any future more environmentally sustainable use.
<b>MW 4</b> It is proposed that, at Protos, only existing built waste uses, sites under construction for waste uses and individual plots with extant planning permission for waste uses will be safeguarded for waste use. On other remaining plots at Protos, waste uses would be acceptable, as would development associated with reducing carbon emissions or sustainable energy generation (as set out in suggested policy approach EP 3 – 'Origin – Protos'). This is different to the policy approach in the current Local Plan which safeguards the whole of Protos for waste uses. Do you agree	No comment.

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with this approach? Please explain your answer.	
<b>30) MINERALS SUPPLY AND SAFEGUARDING</b>	
<b>MS 1</b> Do you agree with the suggested policy approach towards minerals supply as set out in MS 1 'Minerals supply'? If not, please suggest how it could be amended.	The expansion of existing sites or provision of new sites can have significant effects on the Cheshire countryside. They should only be contemplated where there is a clear regional need, all impacts have been properly mitigated and there is a clear restoration and aftercare plan in place.
<b>MS 2</b> If you are aware of other sites that may be suitable for minerals development, please provide details.	N/A
<b>MS 3</b> Do you agree with the suggested policy approach towards proposals for minerals development as set out in MS 2 'Proposals for minerals development'? If not, please suggest how it could be amended.	See our comment in relation to Q MS1
<b>MS 4</b> Do you agree with the suggested policy approach towards minerals safeguarding as set out in MS 3 'Safeguarding'. If not, please suggest how it could be amended.	It is important that minerals safeguarding should not unnecessarily prevent more beneficial development from taking place e.g. potentially housing development on sustainable brownfield sites.
<b>MS 5</b> Do you agree with the policy approach towards oil and gas developments as set out in MS 4 'Oil and gas developments'? If not, please suggest how it could be amended.	We broadly support the criteria which are set out. However, it is critical that the eventual policy is robustly worded to prevent such proposals harming the Cheshire countryside. We also note the policy does not currently address the wider impacts of the use of the oil and gas which is extracted on net zero ambitions. It has been established in recent case law that proposals which require a formal Environmental Impact Assessment must address these wider impacts (see <a href="https://friendsoftheearth.uk/climate/supreme-court-judgment-horse-hill-oil">https://friendsoftheearth.uk/climate/supreme-court-judgment-horse-hill-oil</a> ).
<b>MS 6</b> Do you agree with the suggested policy approach towards minerals restoration as set out in MS 5 'Restoration'? If not, please suggest how it could be amended.	In broad terms, yes. Restoration and aftercare should be a requirement of any proposals for minerals extraction or infrastructure.
<b>31) MISCELLANEOUS</b>	
<b>MISC 1</b> Do you agree with the suggested policy approach towards safeguarded areas around aerodromes as set out in MISC 1 'Safeguarded areas around aerodromes'? If not, please suggest how it could be amended.	No comment.
<b>MISC 2</b> Do you agree with the suggested policy approach	No comment.

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towards Jodrell Bank consultation zone as set out in MISC 2 'Jodrell Bank'? If not, please suggest how it could be amended.	
<b>MISC 3</b> Do you agree with the suggested policy approach towards waterways and mooring facilities as set out in MISC 5 'Waterways and mooring facilities'?	Yes.
<b>MISC 4</b> Do you think that the new Local Plan should have an individual policy for meeting the outstanding housing requirement in Tattenhall that takes forward the content of current Local Plan (part two) policy R 2? Or could policy R2 be deleted?	This should be a matter for consultation with local stakeholders e.g. the Parish Council.
<b>MISC 5</b> Do you think that the new Local Plan should have an individual policy for employment land provision in the rural area that takes forward the content of current Local Plan (Part Two) policy R3? Or could policy R 3 potentially be deleted?	No comment.
<b>MISC 6</b> Do you think that the new Local Plan should have an individual policy for new agricultural and forestry buildings that takes forward the content of current Local Plan (Part Two) policy DM 6? Or could policy DM 6 potentially be deleted?	It can be deleted provided adequate criteria are set in other policies eg concerning landscape, Green Belt and open countryside.
<b>MISC 7</b> Do you think that the new Local Plan should have an individual policy for the rural diversification of land-based businesses that takes forward the content of current Local Plan (Part Two) policy DM7? Or could policy DM 7 potentially be deleted?	It can be deleted provided adequate criteria are set in other policies.
<b>MISC 8</b> Do you think that the new Local Plan should have an individual policy for equestrian development that	It can be deleted provided adequate criteria are set in other policies e.g. concerning landscape protection, Green Belt and open countryside. Light pollution can also be a big issue caused by

QUESTION	CPRE CHESHIRE RESPONSE
<p>takes forward the content of current Local Plan (Part Two) policy DM 8? Or could policy DM 8 potentially be deleted?</p>	<p>outdoor riding exercise areas etc. and must be covered (both in relation to equestrian development and more generally) by other policies.</p>
<p><b>MISC 9</b> Do you think that the new Local Plan should have an individual policy for shopfronts that takes forward the content of current Local Plan (Part Two) policy DM 16? Or could policy DM 16 potentially be deleted?</p>	<p>It can be deleted provided adequate criteria are set in other policies.</p>
<p><b>MISC 10</b> Do you think that the new Local Plan should have an individual policy for advertisements that takes forward the content of current Local Plan (Part Two) policy DM 7? Or could policy DM 17 potentially be deleted?</p>	<p>It can be deleted provided adequate criteria are set in other policies. CPRE Cheshire is concerned about the impact of advertisements on the countryside and it is important that if covered under other policies it is given sufficient prominence e.g. with its own sub-heading and link effectively with national policy.</p> <p>NB It is also imperative that the Council adequately enforce against advertisements which cause harm to amenity or safety, such as the current rash of horrible lorry trailer advertisements alongside the M6.</p>

## ANNEX 2: CPRE'S SUSTAINABLE TRANSPORT HIERARCHY



CPRE's transport policy, which includes a full explanation of its support for this hierarchy, is available here: <https://www.cpre.org.uk/resources/cpre-transport-policy/>