



Carden Group Representations:

Cheshire West and Chester

Issues and Options Consultation (Regulation 18)

August 2025

Land off Langdale Way, Frodsham

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I Introduction

1. These representations have been prepared by the Carden Group, in respect of the current 'Issues and Options' consultation as part of the new Cheshire West and Chester (CWaC) Local Plan.
2. We are a strategic land company that is committed to working closely with councils to create high-quality homes that enhance local communities, prioritising thoughtful design, sustainability, and long-term value that residents can take pride in.
3. As a major landowner, we are promoting land off Langdale Way in Frodsham for residential development. Part of this land has been identified as a potential growth option in the consultation document under reference FRO01. Further details regarding the site are provided in Chapter 10 of this document.

2 Plan Period and Neighbourhood Plans (Questions IN3-IN6)

Question IN 3: Do you have any comments or views on the proposed plan period for the new Local Plan?

4. The length of the Local Plan period is critical. While the Council proposes a 15-year plan period, in accordance with paragraph 22 of the NPPF, this must be measured from the anticipated date of adoption, not from the plan's base year. Given that adoption is unlikely before late 2027, or potentially early 2028, the plan period should extend to at least 2043 as a minimum.
5. Furthermore, paragraph 22 of the NPPF states:

“Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.”
6. This is particularly applicable to the emerging CWaC Local Plan, which includes several significant strategic growth locations. For example:
 - CH02: Chester East- Piper's Ash, with an estimated capacity of 4,316 dwellings, and
 - EP02: Ellesmere Port South, with an estimated capacity of 5,517 dwellings, and
 - WIN05: Winsford West- Hebden Green, with an estimated capacity of 6,376 dwellings.
7. According to Lichfields' Start to Finish (2024) report, large-scale sites of over 2,000 homes typically deliver an average of 150 dwellings per year. Even assuming two major housebuilders operate concurrently, potentially doubling delivery to 300 dwellings per year, the build-out period would still extend to over 20 years, particularly when accounting for a typical six-year lead-in time before the first completions, as also noted by Lichfields. This highlights the long-term nature of strategic site delivery and reinforces the need for a sufficiently long plan period.
8. In summary, to ensure the Local Plan provides at least 15 years of housing supply from the point of adoption, the Council should, as a minimum, plan for an 18-year period between 2025 to 2043. However, given the likely inclusion of several strategic sites, many of which will continue delivering housing well beyond 20 years, a 30-year plan

period (2025 to 2055) represents a more robust and appropriate approach. Extending the plan horizon allows for realistic, phased development of strategic sites, facilitates coordinated infrastructure planning, and helps maintain the relevance and deliverability of the Local Plan over the long term. This approach reduces the risk of policy gaps or early obsolescence.

Question IN 6: 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 connection tests, or design etc.

9. We strongly believe that strategic site allocations for housing should be made through the Local Plan process, rather than being deferred to Neighbourhood Plans. While Neighbourhood Plans (NPs) have a valuable role in meeting 'local' housing needs, shaping local policy and design codes, relying on them to identify and allocate these types of housing sites is likely to delay delivery significantly.
10. This is particularly important in the context of CWaC because the new Standard Method calculation increases the borough's housing need from 1,100 dwellings per annum (dpa), as set out in the adopted Local Plan, to 1,928 dpa – a 74% increase. Meeting this level of need will require an urgent and coordinated response, with larger allocations made in a timely, strategic, and deliverable manner. The Local Plan is the most effective and efficient mechanism to achieve this.
11. In contrast, Neighbourhood Plans are often slow to prepare and update. National Open Data published by the Department for Levelling Up, Housing and Communities (DLUHC) (now known as the Ministry of Housing, Communities & Local Government) shows that the average time taken to bring forward a Neighbourhood Plan from designation to referendum is around five years. Many designated areas never complete the process at all. Even among those that do, few make site allocations, particularly for larger-scale developments.
12. We recognise, however, that Neighbourhood Plans can still be a useful vehicle for delivering smaller-scale sites where communities wish to influence the form and location of local growth. This is consistent with the purpose of neighbourhood planning, which is to empower local people to shape development in their area. Smaller allocations can be identified in a way that reflects local character and infrastructure capacity. However, expecting Neighbourhood Plans to deliver larger, strategic sites would be unrealistic: such sites typically require cross-boundary coordination, significant infrastructure investment, and a timescale that far exceeds the capacity of most NP groups.

13. The rapid nature of the Council's plan-making timescales are such that there will be insufficient time for a NP body to prepare a plan, as many of the strategic decisions about site selection will be made this time next year with the publication of the Regulation 19 plan.
14. Furthermore, relying on NPs to allocate housing introduces uncertainty for landowners, developers, and infrastructure providers. It creates inconsistency in strategic decision-making and increases the risk of delayed or insufficient housing supply.
15. In summary, given the urgency of delivering higher housing numbers, the documented delays in Neighbourhood Plan preparation, and the need for a coordinated approach to infrastructure and growth, we strongly recommend that all strategic housing site allocations be made through the Local Plan. Neighbourhood Plans should complement this by supporting smaller, community-driven allocations where appropriate, as well as influencing design and local policy. This approach will provide clarity, accelerate delivery, and help meet the Council's pressing housing needs in a plan-led, sustainable manner.

3 Vision (Question VI2)

Question VI 2: Should the vision include/establish a set of principles and priorities? Are these the right ones – do you have any other suggestions?

16. We welcome the Council's intention to set a positive, place-based vision for the future of Cheshire West and Chester, centred around sustainable growth, community wellbeing, and environmental protection. However, we believe the current vision omits a fundamental principle that is essential to the future prosperity and inclusivity of the borough: the need to plan positively for housing delivery in response to a national and local housing crisis.
17. Nationally, the UK continues to face a systemic housing shortage. Successive governments have failed to meet the national target of 300,000 homes per year. The Centre for Cities recently concluded that Britain has built 4.3 million too few homes over the last seven decades.
18. As a result, we request that the Council amend the vision to include a fifth principle, along the following lines:
 - Meeting Housing Needs – meeting the full, objectively assessed housing needs of all parts of the borough, including affordable, market, and specialist housing.

4 Objectives (Questions OBI-OB5)

Question OB 1: Please select the option which is the most appropriate approach for the new Local Plan:

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

19. We support Option A as the preferred framework for setting the strategic objectives of the new Local Plan. While Option B (Sustainability Appraisal objectives) plays an important role in testing the sustainability of policies, it is not suitable as the primary structure for the Local Plan's strategic objectives.

Question OB 3: Do you feel that the option of taking forward the current Local Plan objectives into the new Local Plan, as set out in Option A 'Take forward the current Local Plan objectives' above, is an appropriate approach?

20. Option A rightly places emphasis on key strategic priorities such as infrastructure provision (SO5), economic development (SO2), and transport (SO4), which are essential for attracting landowner and developer interest, enabling the planning and promotion of long-term strategic sites, and underpinning effective masterplanning and delivery. These objectives provide a robust framework to support the practical delivery of sustainable development.

Question OB 4: Do you think that objectives SO1, SO3, SO9, SO10 need to be amended if they are to be taken forward into the new Local Plan? Do you have any suggestions for how they should be amended?

21. First, SO1 should be updated to reflect changes in the settlement hierarchy. This involves the inclusion of Frodsham now being recognised as a market town. The settlement already functions as service hubs and are well placed to accommodate future growth. As such, SO1 should explicitly reference the settlement and the need to promote development.

22. Secondly, SO9 should also be revised to reflect the need for planned growth on the edges of market towns, particularly those referenced above, in addition to development around Chester and the larger towns of Ellesmere Port, Northwich, and Winsford.
23. Lastly, SO10 should be amended to acknowledge that, in light of the significantly increased housing requirement, the limited brownfield land supply, and the necessity of directing development to the most sustainable locations, the release of land from the North Cheshire Green Belt will be required.

Question OB 5: Do you feel that the option of using the Sustainability Appraisal objectives in the new Local Plan, as set out in Option B 'Use the Sustainability Appraisal objectives' above, is an appropriate approach?

24. Option B, while important for environmental protection and broader sustainability goals, does not place sufficient emphasis on housing delivery. This approach risks sidelining the urgent need to address the local housing crisis, especially given the significant increase in housing requirements for Cheshire West and Chester. Without a clear focus on facilitating the timely allocation and development of housing sites, Option B's objectives may hinder effective planning and slow the delivery of much-needed homes, undermining the Local Plan's ability to meet pressing community and market demands.

5 Spatial Strategy (Questions SS1-SS41)

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

25. We welcome the Council's acknowledgment of the need to meet the housing requirement identified by the Government's standard method. However, we strongly urge the Council to plan for a housing requirement above the 1,928 dwellings per annum (dpa) baseline figure (based on the latest May 2025 affordability ratios). This position is entirely consistent with the NPPF which makes clear at paragraph 11(b) that the standard method provides only a minimum starting point for assessing housing need. Planning for a higher figure is not only justified by national policy but essential to delivering a robust Local Plan.
26. In the case of Cheshire West and Chester, there is clear and compelling evidence that a higher figure can be delivered sustainably. For example, according to the Council's latest 2025 Housing Land Monitor report, between 2014/15 and 2024/25, annual completions have consistently exceeded the 1,100 dpa housing target, peaking at 2,542 dwellings in 2017/18. Over this 11-year period, the Council has over-delivered by more than 9,000 dwellings against the adopted Local Plan target, evidencing both market appetite and delivery capability.
27. In light of the evidence, we recommend that the Local Plan sets a housing requirement of at least 2,200 dwellings per annum. This represents a modest uplift of around 15% above the standard method figure, which is substantially lower than the average over-delivery of 54% the borough has achieved since 2014. This proposed figure is both realistic and deliverable, based on the area's consistent track record of strong housing delivery. Setting a higher requirement not only reflects market capacity but ensures the Local Plan remains robust, responsive to change, and capable of supporting long-term economic growth and housing affordability.

Question SS 2: Do you think the Council should consider a stepped housing requirement that plans for a lower level of housing delivery earlier in the plan period?

28. The Council should not adopt a stepped housing requirement in the new Local Plan. Delaying delivery in the early year's risks failing to address urgent housing needs and affordability challenges. The NPPF makes clear that the standard method figure is a minimum starting point and that local plans should aim to meet housing needs as soon as possible. In Cheshire West and Chester, there is no justification for a stepped approach, as the borough has a strong track record of delivery, frequently exceeding the current adopted LP target. A stepped trajectory would unnecessarily delay much-

needed homes, complicate delivery, and reduce certainty. Instead, the Council should maintain a consistent annual requirement from the outset to reflect market capacity, ensure timely delivery, and support the objectives of the NPPF.

29. There is no justification for a stepped housing delivery as the Council has consistently delivered about the local plan housing requirements, and a level in excess of the proposed housing requirement.

Question SS 4: Do you agree with the suggested policy approach towards the spatial strategy principles, as set out in SS 3 'Spatial strategy principles' above? If not, please suggest how it could be amended?

30. We broadly support the principle of prioritising previously developed (brownfield) land within existing settlements. However, we must stress that the scale of available brownfield land is wholly insufficient to meet the district's housing needs over the plan period.
31. According to the most recent Brownfield Land Register (2021), only 96 hectares of brownfield land across the borough remain without planning permission. Based on typical brownfield densities in the UK, estimated by the CPRE State of Brownfield 2022 report at approximately 70 dwellings per hectare, this equates to a theoretical capacity for around 6,720 dwellings. However, this figure should be treated with caution. The Brownfield Land Register does not account for a range of site-specific constraints that frequently affect deliverability. These include flood risk, contamination, heritage restrictions, ecological value, and site access issues. In addition, many brownfield plots are in fragmented ownership or face significant viability challenges due to abnormal development costs. As such, the actual number of dwellings that can be delivered from these sites is likely to be substantially lower. A realistic assumption must apply a discount to reflect these limitations, reducing the notional 6,720 dwelling figure to a far more modest and deliverable total.
32. Moreover, the most recent 2025 Housing Land Monitor Summary Report identifies a supply of 6,407 dwellings when assessed against the housing requirement.
33. Given this context, and the need to deliver a minimum of 34,000 homes (1,914 dpa over an 18-year plan period) we urge a more balanced and realistic policy approach that acknowledges the essential role of greenfield, and specifically Green Belt, sites in delivering sustainable housing growth. Indeed, some of the most sustainable settlements in the district, including Chester, Ellesmere Port, Northwich, Neston, and Frodsham, are entirely constrained by Green Belt boundaries. Without carefully considered Green Belt release, these settlements will not be able to accommodate proportionate growth, despite their strong service base, connectivity, and employment opportunities.
34. We therefore recommend that Policy SS3 be amended to include the following:

- A clear recognition that, while brownfield sites are to be prioritised, their capacity is inherently limited and are insufficient to meet the Council's full housing needs.
 - An explicit commitment to the release of greenfield sites, including within the Green Belt, where they contribute to the delivery of sustainable, well-planned urban extensions, particularly in the most sustainable settlements.
35. Overall, a sound spatial strategy must be evidence-led, and the current housing land supply and brownfield positions clearly demonstrate the need to release greenfield and Green Belt land.

Question SS 6: Should all settlements have some level of development, regardless of whether they are identified in the settlement hierarchy?

36. Yes, all settlements should have some level of development, even if they are not identified in the settlement hierarchy. This supports the NPPF's objective of promoting sustainable development in rural areas by allowing small-scale growth that helps maintain village vitality, supports local services, and meets local housing needs.
37. However, the vast majority of housing growth should be directed to settlements identified as Local Service Centres and above, as these have the infrastructure, services, and transport links needed to accommodate development sustainably, in line with NPPF paragraphs 79 and 105.

Question SS 8: Do you agree that in smaller settlements, the character should be protected, and development should not exceed the capacity of existing services and infrastructure?

38. Although protecting the character of smaller settlements is important, we also recognise that new development can help fund upgrades to infrastructure and services, enabling settlements to grow in a balanced and resilient way.
39. Therefore, while the principle of protecting character and infrastructure capacity is sound, we encourage a flexible, proactive approach that recognises development as a catalyst for positive change in smaller settlements.

Question SS 9: Have circumstances changed since the adoption of the Local Plan (Part One), that would now justify Green Belt release?

40. Yes, circumstances have changed significantly since the adoption of the Local Plan (Part One), particularly in relation to housing need. The introduction of the Government's standard method for calculating housing need has dramatically increased the

requirement for new homes within Cheshire West and Chester by over 70% compared to previous figures.

41. The new spatial strategy identifies Chester, Ellesmere Port, Northwich, Frodsham, Neston and Parkgate as the key settlements expected to deliver the majority of the housing growth. Under the previous plan, these areas were assigned 14,750 dwellings, equivalent to around 67% of the overall 22,000-home requirement. However, if the Council adopts, as stated earlier and what we consider to be the bare minimum housing target of 34,000 homes over the plan period, in line with the uplifted standard method, then these key settlements would need to accommodate approximately 22,780 homes.
42. In this context, reliance solely on brownfield land is no longer viable. The most recent Brownfield Land Register (published in 2021) identified a capacity of only 6,720 dwellings on sites without planning permission, across the entire borough. Given that this data is now over four years old, and many of these sites are likely to have been developed or found unviable, the actual deliverable brownfield capacity is likely to be significantly lower.
43. As such, Green Belt release has become both justified and necessary. A further material change in circumstances is reflected in the latest version of the National Planning Policy Framework (NPPF), which introduces the concept of 'Grey Belt' in paragraph 148. This refers to land within the Green Belt that does not strongly contribute to any of the purposes (a), (b), or (d) set out in paragraph 143 of the NPPF. This updated guidance provides clear scope for local planning authorities to identify and release such land where necessary to meet identified development needs.
44. Taken together, the significant uplift in housing need, the limited capacity of brownfield land, and the strong likelihood that the existing spatial distribution strategy will be largely retained all point to a clear and compelling set of changed circumstances. These factors justify the need for a strategic review of Green Belt boundaries as part of the emerging Local Plan. In this context, the targeted release of 'Grey Belt' land, which makes a limited contribution to the Green Belt purposes provides a sustainable, deliverable, and policy-aligned solution to meeting the borough's housing needs.

Question SS 10: Are there any other considerations that we should take account of in relation to future Green Belt policy?

45. Yes. A key consideration is the need for long-term strategic planning, particularly in light of the scale and nature of development likely to be required, including large strategic sites that will likely extend well beyond the current plan period.
46. Even if the Council is not minded adopting a longer plan period to 2055, as we have suggested is appropriate given the scale of need and lead-in times for strategic sites, it should, at the very least, release suitable Green Belt land now and safeguard it for

development beyond the likely end of the plan period in 2043. This approach is both pragmatic and firmly supported by national policy.

47. The NPPF (paragraph 145) is clear in this regard. It states: *‘Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period’*.
48. This policy exists precisely to ensure that long-term needs can be met in a planned, controlled, and sustainable manner, avoiding the need for piecemeal or reactive Green Belt releases in future Local Plan reviews. It is especially relevant in authorities like Cheshire West and Chester, where the scale of uplifted housing need, coupled with the potential reliance on strategic-scale development, means that a significant proportion of new homes will not be delivered until well beyond 2043.
49. Failure to safeguard land now would risk artificially constraining the long-term growth of settlements, even where lower-performing or “Grey Belt” land is available and suitable for eventual development. It would also undermine the clarity and certainty that both communities and the development industry require for effective infrastructure and investment planning.
50. In summary, even if the Local Plan period is not extended to 2055, the Council should identify and release appropriate Green Belt sites now, not only to meet immediate needs but also to safeguard land for the longer term. This is an approach explicitly supported by national policy, and it reflects good plan-making practice.

Question SS 11: Please select the option which is the most appropriate spatial strategy for Cheshire West and Chester:

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

Question SS 12: Do you have any alternative spatial strategy options that you would like to suggest?

51. While we broadly support Option B, which focuses growth in and around the largest settlements, we believe this approach should be refined in light of the proposed amendments to the settlement hierarchy.
52. Notably, the elevation of Frodsham to Market Town status, justifies the settlement receiving a greater proportion of growth than those identified as Key Service Centres.

53. These towns serve important sub-regional roles, offer a strong base of services and infrastructure, and are well-placed to accommodate additional development sustainably. As such, they should be prioritised for growth ahead of smaller, less well-connected settlements.
54. Moreover, irrespective of which housing requirement or spatial option is chosen by the Council, it is our view that Frodsham could support up to 3,000 dwellings as set out by the Council in Option C and that this is the target the Council should seek to maintain for the settlement through the next draft iteration of the plan. No evidence has been provided to suggest that this level of growth cannot be sustainably accommodated under all options.
55. We therefore broadly support a modified Option B approach, where growth is focused on the most sustainable settlements in the borough, including not just the principal urban areas, but also the Market Towns that demonstrate strong service provision and development potential. This approach also ensures alignment with NPPF which states that 'Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes'. This emphasises the importance of focusing growth where it can be best supported and integrated.

Question SS 14: Do you feel that Option A is an appropriate spatial strategy for the new Local Plan?

56. We do not support Option A, as it would preclude any significant development in the borough's largest and most sustainable settlements - Chester, Ellesmere Port, Northwich, Neston, Parkgate, and Frodsham- all of which are tightly constrained by Green Belt designations.
57. As outlined in our response to Question SS9, the latest Brownfield Land Register (2021) demonstrates that there is an insufficient supply of available and deliverable brownfield sites within these settlements to accommodate the level of housing and economic growth required over the plan period. Relying solely on these limited brownfield opportunities is not a realistic or deliverable strategy.
58. The National Planning Policy Framework (NPPF, December 2024) is clear at paragraph 11a that:

"All plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas); and adapt to its effects."

59. Without a Green Belt review, the Council cannot sustainably align growth with infrastructure in its most accessible and well-served urban areas. This would result in development being directed to less appropriate, more rural locations, which is inconsistent with the NPPF's strategic objectives.
60. Accordingly, a spatial strategy that fails to review the Green Belt is not compliant with national policy - particularly where it blocks sustainable growth in key settlements.
61. We therefore strongly urge the Council to undertake a full Green Belt review as part of its spatial strategy to ensure the Local Plan is effective, positively prepared, justified, and consistent with national policy, as required by paragraph 36 of the NPPF.

Question SS 16: Do you feel that Option B is an appropriate spatial strategy for the new Local Plan?

62. As stated in response to Question SS 12, we broadly support the principle of Option B's settlement hierarchy, which aligns with NPPF paragraph 77 by focusing development in the most sustainable locations with good access to jobs, services, and public transport. However, it is important to note that in the current Local Plan, the distribution of housing across the settlement tiers ultimately reflected residual need at the point of adoption, rather than an initial strategic target. By that stage, a significant proportion of the overall requirement had already been permitted in the Key Service Centres, which artificially reduced the scale of allocations in those locations. It is essential that the new Local Plan avoids repeating this approach and instead bases its distribution on the actual capacity and sustainability of each settlement tier from the outset.
63. This is further evidenced by virtue of the fact that the Part 2 Local Plan made no allocations for development to meet the needs of the KSCs.
64. In light of this, while we agree with Option B's general settlement hierarchy, we believe the proposed housing numbers are insufficient to meet identified needs. As outlined in our earlier response to Policy SS4, the Local Plan should plan for at least 34,000 dwellings over the plan period, consistent with NPPF paragraph 16, to ensure the plan is positively prepared and meets needs in full. Within Option B, this would require redistributing growth to fully utilise the capacity of the Borough's most sustainable locations, avoiding over-reliance on windfall or urban intensification, which is unlikely to be deliverable at scale.

Question SS 17: If you do not feel that Option B is an appropriate spatial strategy option, are there any changes that you could suggest?

65. If the Council intends to follow a spatial strategy similar to that used in the current Local Plan, it is important to remember that the housing numbers allocated to different settlement tiers last time were not an initial policy target but instead reflected the

residual need remaining by the time the plan reached adoption. This was because a substantial amount of the overall housing requirement had already been permitted in the Key Service Centres earlier in the plan period, meaning that the Local Plan allocations in those locations were significantly reduced.

66. In determining an appropriate distribution for this plan period, the Council should also take account of the findings of the Rural Regeneration Strategy and Action Plan (September 2011), which concluded:

“Based on this analysis it would seem reasonable to conclude that growth of between 11% and 13% in the number of dwellings and households in the rural area is the minimum necessary to address the challenges identified. It is reasonable to add some contingency to this figure – to account for exacerbation of trends and to provide some slippage. A growth target of 15%, which equates to 8,000 new homes, is therefore considered to be appropriate.”

67. This evidence demonstrates that a meaningful proportion of growth in what were at the time considered rural areas but now include the proposed Market Towns and Key Service Centres, is essential to maintaining rural vitality, supporting services and employment, and addressing identified challenges. The existing local plan allocated only one third of the need for 8,000 homes. Rural housing needs were not met by the existing local plan strategy.
68. A distribution strategy should therefore ensure that allocations are not artificially constrained by relying on historic residual figures but instead reflect the full potential and sustainability of each settlement tier in delivering the overall housing requirement.

Question SS 18: Do you feel that Option C is an appropriate spatial strategy for the new Local Plan?

69. While we support the principle of directing development to sustainable settlements with transport hubs, this must approach must have regard to the inherent sustainability of the existing settlement.
70. Therefore, we do not support Option C as a viable spatial strategy as set out in the Regulation 18 for several reasons, foremost being the assumption that proximity to travel corridors, such as train stations, do not make these locations suitable for substantial housing growth. While access to these types of transport links is important, it does not guarantee the sustainability or deliverability of large-scale development. Many of the proposed locations, such as Delamere, currently lack essential infrastructure and services. Significant time and investment would be required to create the necessary facilities to support new communities, including schools, shops, healthcare provision such as GP surgeries, and adequate local employment opportunities. Without these critical services, these locations would fail to meet the wider sustainability objectives

outlined in the NPPF, which emphasise the importance of delivering development in places that provide access to a range of services and facilities, not just transport links. Moreover, developing in such isolated locations risks placing excessive reliance on private car use for day-to-day needs, undermining environmental and social sustainability goals. Therefore, selecting sites based solely on their proximity to travel corridors overlooks the broader requirements of creating balanced, self-sufficient communities, and this approach is unlikely to deliver the sustainable growth needed in the Borough.

Question SS 41: Which of the identified potential growth areas around Frodsham do you consider to be the most suitable?

71. The growth area identified as FRO01, on the eastern edge of Frodsham, is in our view the most suitable of the three potential options. This is primarily due to its high level of accessibility. For example from the centre of the site, all three primary schools in Frodsham, Manor House, St Luke's, and Frodsham CofE, are all located within one mile, offering shorter walking distances than the other 2 identified growth areas. The site is also less than a mile from key town-centre services, including the train station and Morrisons supermarket.
72. The site also provides the greatest opportunity to strengthen connections to a wide range of existing community assets, including Top Park Playground, the Community Orchard, and Hob Hey Wood. These assets would themselves be enhanced through the delivery of an integrated open space network.
73. From a Green Belt perspective, FRO01 also represents one of the more logical green belt release opportunities, as it is naturally bounded to the east by Hob Hey Wood. By contrast, development of the full extent of FRO03 would significantly reduce the separation between Frodsham and neighbouring Helsby, increasing the risk of coalescence between the two settlements.

6 Green Belt and countryside (Questions GB1-GB2)

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

74. While the protection of the borough's countryside is important, it is essential that policy decisions are underpinned by a robust and up-to-date evidence base, rather than seeking to preserve rural character for its own sake. The intrinsic character and beauty of the countryside should be assessed objectively, and opportunities for sustainable development should be considered where they do not compromise significant environmental or landscape assets.

Question GB 2: Should there be a separate policy for countryside and Green Belt areas?

75. Policy STRAT9 in adopted Local Plan combines (and in fact conflates) Green Belt and countryside policy. This confuses the appropriate policy tests for two different policy areas.
76. Policy STRAT9 creates a planning paradox whereby if a small village was located within the Green Belt (and washed over because it has no settlement boundary), development would be acceptable in principle because it could amount to limited infilling in a village and/or redevelopment of previously developed land. This approach is consistent with the approach in paragraph 150, 154e and 154g of the Framework. The Framework does not say that settlements in the Green Belt must have a settlement boundary – this a different approach from the previous guidance in PPG2.
77. However, STRAT9 does not permit development in small villages in the open countryside which do not have settlement boundaries (but which would be washed over if in the Green Belt). Instead, it treats them as countryside. This approach is far too simplistic. There are many small villages in CWaC which are clearly not countryside and where development should be permissible as infill or appropriate scale development.
78. Consequently, STRAT9 is more restrictive towards development in the countryside and rural communities than development in the Green Belt. Development in the Green Belt is also capable of compliance with the development plan through the demonstration of very special circumstances – a policy test not allowed for in the countryside.

79. The new local plan should treat countryside and Green Belt separately and should allow for appropriate development in or on the edge of villages outside the Green Belt.

7 Housing (Question HO2)

Question HO 2: Should the housing mix and type and specialist housing be delivered through a percentage policy approach that sets requirements for each category of housing?

80. Carden support the principle of delivering a mixture of housing types, tenures and specialist housing to meet the diverse needs of the community. However, we consider that applying a rigid percentage-based requirement across all sites is overly prescriptive and could give rise to significant viability challenge
81. Instead, we believe a more flexible, evidence-led approach is consistent with both local needs and national policy. The National Planning Policy Framework (NPPF, paragraph 61) requires local authorities to *“it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”* Importantly, the NPPF does not prescribe fixed percentages but requires responsiveness to locally specific circumstances.
82. Local demographic evidence within the Council’s Places background paper (published 2024) illustrates why a one-size-fits-all percentage approach is inappropriate. For example, over 20% of the population of Malpas is aged over 70, compared to only 13% in Ellesmere Port. This demonstrates significant variation in housing need across the district. A flexible policy approach will ensure that housing delivery is locally responsive, aligns with the latest evidence, and produces housing that is genuinely in demand.
83. This flexibility also helps to support deliverability. Overly prescriptive policies risk constraining development, creating mismatches between local demand and supply, and undermining viability. The NPPF (paragraph 35) requires plans to ensure that policies relating to affordable housing do ‘not undermine the deliverability of the plan’. A non-prescriptive approach, guided by up-to-date housing needs evidence, ensures that new housing contributes positively to local markets without jeopardising site viability.
84. In summary, while we fully support the objective of securing a wide choice of high-quality homes and specialist housing, this should be achieved through a flexible, evidence-based policy framework rather than rigid percentage requirements. This approach is more consistent with the NPPF and will better reflect the varying needs of communities across the borough.

8 Landscape (Question LA3)

Question LA 3: In advance of any formal designation of national landscape, how should the Local Plan deal with it?

85. Recent reports indicate that the bid to have the Cheshire Sandstone Ridge recognised as a National Landscape (Area of Outstanding Natural Beauty) has been temporarily suspended. According to Natural England, this pause is linked to reductions in government funding. As a result, there is currently no requirement for planning policy to consider this designation.

9 Green infrastructure, biodiversity and geodiversity (Questions GI1 and GI3)

Question GI 1: Do you agree with the suggested policy approach towards green infrastructure, biodiversity and geodiversity, as set out in GI 1 'Green infrastructure, biodiversity and geodiversity' above? If not, please suggest how it could be amended?

86. We support the principle of enhancing tree cover and green infrastructure, but the proposed blanket requirement to achieve 16% tree cover in every ward is neither justified nor consistent with national policy.
87. The Issues and Options paper states that the 16% target comes from the Local Nature Recovery Strategy (LNRS), but this strategy is still only in draft form. Relying on an emerging document that has not yet been finalised or tested is unsound. Furthermore, the LNRS does not explain how this figure was calculated or why it should apply uniformly across all wards, regardless of their differing circumstances.
88. The NPPF does encourage tree planting, but in a balanced and site-specific way. Paragraph 136 states that applicants and local planning authorities should work with highways and tree officers to ensure “the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.” This clearly points to an individualised approach rather than a blanket percentage. Imposing arbitrary targets risk requiring tree planting in unsuitable locations, which could create practical conflicts and undermine good design.
89. Adding excessive numbers of trees without regard to site-specific circumstances could also pose viability issues, particularly on constrained or higher-density sites where developable land is limited. A more flexible policy, proportionate to the scale and character of each site and supported by clear evidence, would be more consistent with national policy. This would still achieve meaningful increases in tree planting while avoiding unfair burdens on development and ensuring housing and employment delivery remains viable.

Question GI 3: Should new Local Plan policy go above the 10% mandatory biodiversity net gain set nationally?

90. No. Although some sites may be capable of achieving more than the mandatory 10% Biodiversity Net Gain, it would not be reasonable or justified to impose a higher blanket standard over and above the nationally prescribed requirement. Any additional provision should be considered on a case-by-case basis, reflecting the specific

circumstances of the site. Where developments are able to exceed the 10% requirement, this can be taken into account as part of the overall planning balance when individual applications are assessed.

10 Land off Langdale Way, Frodsham

The Site

91. The site extends to approximately 85 acres (see Figure 1 below), with Carden Group holding a substantial interest in the land. It comprises a mix of arable fields and grassland pasture, enclosed by a network of hedgerows and scattered trees. The topography gently slopes eastward, descending towards the Weaver Valley.

The Proposals

92. Carden Group has instructed a number of technical studies of the site which include:
- Master planning and landscape
 - Access and transport study
 - Utilities appraisal
 - Drainage and flood risk assessment
93. These studies have not identified any fundamental or insurmountable constraints which prevent the land being brought forward for development.



Figure 1: Site outline

94. Moreover, these studies have informed the preliminary master planning work (see Appendix I) which shows that key elements of any planning application could include:

- Pedestrian, cycle and vehicular access off Langdale Way and Bradley Lane.
- Connections to community assets outside of the site boundary including, Top Park Playground, Community Orchard and Hob Hey Wood will be enhanced as part of an integrated open space network.
- Incorporating and enhancing the existing Rights of Way through the site and seek to provide opportunities for greater access from the eastern settlement edge of Frodsham to the wider countryside through Eddisbury Way.
- Connections to local amenities and potential new facilities on site.
- A mix of formal and informal play spaces that foster a vibrant, family-friendly environment.

II Summary

95. In summary, Carden Group considers that a Local Plan should direct growth towards the most sustainable locations and recognise Frodsham's strategic function as a market town situated within a highly accessible transport corridor.
96. We are confident that our land to the east of Frodsham is ideally placed to assist the Council in meeting its housing needs. The detailed technical work undertaken in support of the site confirms that no fundamental or irresolvable constraints exist which would prevent its successful delivery.

Appendix I: Frodsham Vision Document (attached to email submission)