



# Cheshire West and Chester Local Plan 2025 – Issues and Options consultation

## Cheshire Wildlife Trust Response

### Introduction

#### Question IN 1

- While there is an existing Peatlands of Cheshire West and Chester document in the evidence base, there is none relating to natural and biodiversity assets within the borough. CWaC has spent the last year leading the development of the Local Nature Recovery Strategy (LNRS), which is the most comprehensive assessment and strategy relating to the natural environment that could possibly have been undertaken for the area. We question why this has not been included in the evidence base for this new local plan, and we expect it to be an integral document used to inform the development of the entirety of the new local plan so as to best embed the protection of the natural environment throughout.

#### Question IN 2

- The Monitoring Framework should set out how the monitoring of BNG will be undertaken to ensure that gains for nature that are promised by development are really delivered.

#### Question IN 5

- The Ellesmere Port section 4.16 on page 39 does not once mention allocation EP04, which is the biggest threat to the functionally linked land connected to the Mersey Estuary SPA/Ramsar of the four Ellesmere Port growth areas.

### Vision

#### Question VI 1

- We support the inclusion of “net increase to biodiversity” within the ‘tackling climate change’ bullet point. We would also encourage the following amendment: “adapting to and mitigating the effects of climate change, particularly through the use of nature-based solutions”.

## Objectives

### Question OB 1

- We are strongly in favour of Option B - Using the Sustainability Appraisal Objectives.

### Question OB 3

- We do not feel that the option of taking forward the current Local Plan objectives is an appropriate approach at all, as they do not mention biodiversity or the natural environment, and generally ignore other crucial sustainability principles such as tackling climate change and reducing waste.

### Question OB 4

- SO3 should incorporate nature-friendly farming initiatives if it is to be taken forward.
- SO10 should include the biodiversity value and natural assets of Cheshire West and Chester.

### Question OB 5

- The option of using the Sustainability Appraisal objectives in the new Local Plan is absolutely the appropriate approach as these incorporate much stronger wording around protecting and enhancing the natural environment including biodiversity and a general emphasis on sustainability.

## Sustainable Development

### Question SD 1

- We are in favour of the suggested policy approach towards sustainable development, particularly in the inclusion of “high quality, interconnected and multifunctional green and blue infrastructure [...] to enhance biodiversity” (4)
- We encourage the following addition to 6: “Schemes should minimise the risk of overheating and buildings must be able to withstand the impact of extreme conditions, such as from flooding and heat exposure, particularly through the use of nature-based solutions such as green roofs, tree planting and SUDS”.

## Spatial Strategy

### Question SS 24

- CH01 should be thoroughly assessed for priority habitat before being allocated for development as there are numerous pockets of deciduous woodland.

### Question SS 27

- Area EP04 is Floodplain Grazing Marsh priority habitat as well as functionally linked land to the Mersey Estuary SPA as well as being a Local Wildlife Site. The area should be restored to better condition grazing marsh instead of being built up further.

### Question SS 42

- FR001 is directly adjacent (in fact the orange boundary on map 5.10 suggests that it includes) the Hob Hey Ancient Woodland. We will assume the woodland would not be within the allocation because it is irreplaceable habitat and should not be destroyed under any condition. However, even housing adjacent to the woodland would have repercussions on it if impacts without mitigation for recreational pressures. We therefore recommend that the other growth areas be explored before this one in order to maintain a buffer between Hob Hey and housing development.

### Question SS 57

- TAR04 is on our potential LWS list and could be important habitat, potentially enough to be a designated site. The land should be surveyed and assessed before it is allocated for development.

## Ellemesmere Port

### Question EP 8

- Development should be constrained to areas that were previously developed. Further development on coastal and floodplain grazing marsh is unacceptable, as these areas of high distinctiveness priority habitat with natural restoration potential should be safeguarded for such.

## Winsford

### Question WI 1

- The first paragraph of the policy should include “improvements to biodiversity”.

### Question WI 2

- The key policies should include “improvements to wildlife and biodiversity”.

## Frodsham

### Question FR 1

- “managing the potential impact on designated sites” should be changed to “avoiding, mitigating and compensating for potential impacts on designated sites”.

## Neston and Parkgate

### Question NP 1

- “managing the potential impact on designated sites” should be changed to “avoiding, mitigating and compensating for potential impacts on designated sites”.

## Town Centres

### Question TC 1

- There is a lot of potential for using urban greening methods to make town centres more attractive and healthier for communities, including tree planting for shade, well-designed SUDS features for flood prevention, green roofs and walls for carbon capture and air quality, and maintaining parks and gardens for biodiversity and well-being.

## Health and Wellbeing

### Question HW 1

- We propose the following amendment: “Proposals should also aim to promote high quality access to green spaces across the borough that will support opportunities to widen and strengthen the borough's biodiversity, cultural, sport, recreation and leisure offer”.

## Open Space

### Question OS 1

- We support the inclusion of biodiversity and green corridors in the protection of open spaces. We would encourage further protection/designation of open spaces on the basis of biodiversity where it is of high value.
- We also encourage policy wording that supports new open and green spaces that are designed specifically with biodiversity enhancements in mind.

### Question OS 3

- The Local Nature Recovery Strategy for Cheshire and Warrington should be in the evidence base for open space as opposed to being relegated to a 'key issue'. The purpose of the strategy is to inform development, green infrastructure, and open space, and therefore local plan policy regarding these topics.

### Question OS 4

- We support the use of the hierarchy to encourage developers to provide open space onsite, offsite, and then as a financial contribution. We would further encourage the policy for open space as part of new developments to explicitly tie into biodiversity net gain requirements.

## Flood Risk and Water Management

### Question FW 1

- We suggest that the wording of the “water quality, supply and treatment” be changed slightly in order to leave no room for development to negatively impact water quality; any deterioration to water quality is unacceptable. It should therefore read: “development proposals do not cause deterioration to water quality or have an unacceptable impact on water quantity”.

### Question FW 2

- We support the requirement for nature-based solutions to maximise multifunctional benefits.

### Question FW 3

- Degraded wetland habitats (such as peat, floodplains, etc) should be prioritised for nature-based solutions related to flooding and should be prevented from being built on. The Local Nature Recovery Strategy should be a good tool for identifying and designating these areas. This can then have additional biodiversity benefits if they are done with wildlife in mind.

## Green Infrastructure, biodiversity and geodiversity

### Question GI 1

- “3. Continue to protect protected/priority species and habitats and geodiversity”
- “1. Hedgerows - The new policy will require that all external edges of all new development have native species-rich hedgerows as part of a comprehensive

landscape scheme, this would be secured with an agreement specifying type/species and nature of hedgerow”

- The Biodiversity section should include an additional policy section for “priority species” where additional mitigation/compensation, separate to BNG, would be required if development impacts areas used by priority species. Currently, BNG does not take into account species, and they have little protection against displacement from development.
- The Biodiversity section should also include another policy section for “priority habitats”, requiring developments to retain and enhance those features within the development; this can be done through the creation of the open space in the development.

### Question GI 3

- We **extremely strongly** support the Local Plan going above the 10% mandatory biodiversity net gain requirement. Research by Kent Wildlife Trust has shown that 20% BNG does not materially affect the viability of developments, but that it can make a big difference to nature’s recovery. [Viability-Assessment-of-Biodiversity-Net-Gain-in-Kent-June-2022.pdf](#)

### Question GI 5

- Functionally linked land should absolutely be protected in the Local Plan as they have little protection elsewhere in legislation. Many internationally important species of birds count of the functionally linked land at Fordsham, Heslby and Ince Marshes for example, and it is currently being taken over by development without enough consideration for the wildlife that depend on the area for the Mersey Estuary Ramsar/SAC/SPA site.

## Design and Sustainable Construction

### Question DS 1

- We request that an additional bullet point be added to DS1 which would be something to the effect of “contribute to nature’s recovery” or “incorporate features to enhance wildlife and biodiversity”
- High quality design should also incorporate a policy to encourage developers to consider and incorporate natural features (biodiversity, geodiversity, etc) in the earliest stages of their designs. This would require developers to follow the mitigation hierarchy more closely (particularly avoiding in the first instance) instead of waiting until they’ve designed the scheme to take the existing features into account. This masterplan approach is extremely important to creating comprehensive and cohesive developments and should be reflected in the local plan.

## Energy

### Question EN 1

- There is no mention of biodiversity and very little of negative impacts on the natural environment in policy EN1. Because NSIPs are not yet bound by Biodiversity Net Gain, we expect the Local Plan to set out how energy infrastructure projects can positively contribute to biodiversity and nature's recovery.

## Minerals Supply and Safeguarding

### Question MS 3

- The policy does not refer to biodiversity at all, which can easily be impacted by minerals development as they destroy the soil and habitats present.

### Question MS 6

- This policy can be a good opportunity to encourage minerals, oil and gas developments to restore the land to better biodiversity and create opportunities for larger scale nature recovery. This approach has been followed for quarries across the country (including Crown Farm in Cheshire West), which were restored to nature reserve-level wildlife sites to the great benefit of nature and local communities. This should be explicitly encouraged in the policy.