

1 February 2019

Delivered by email

Gill Smith
Planning Policy
Cheshire West and Chester Council
4 Civic Way
Ellesmere Port
CH65 0BE

Dear Gill,

**CHESHIRE WEST AND CHESTER LOCAL PLAN (PART TWO) LAND ALLOCATIONS AND DETAILED POLICIES –
SCHEDULE OF MAIN MODIFICATIONS**

THIS IS PROTOS LLP (PEEL GROUP) (REPRESENTOR ID: 1150673)

We write on behalf of our client, Peel Environmental Limited (“PEL”). PEL is the landowner of Protos (formerly known as Ince Park) and adjacent land, and is a subsidiary of the Peel Group - a leading regeneration, infrastructure, and real estate company in the UK.

This letter sets out PEL’s representations in response to the *Local Plan (Part Two) Land Allocations and Detailed Policies - Schedule of Main Modifications* (January 2019) (“SoMM”).

PEL has participated in all stages of the preparation of the emerging Local Plan (Part Two) Land Allocations and Detailed Policies (“LP2”), in particular it submitted representations to the pre-submission public consultations and it participated at the Examination in Public (EiP) in September 2018 submitting responses to Matters 2, 5, 7, 9 and 17 and appearing at hearing sessions.

The proposed Main Modification 16 (MM16) sets out an amendment to draft Policy EP 6 (Ince Park). PEL welcomes and supports this modification, which responds positively and specifically to PEL’s representations that are reiterated in Matter Statement 9 (see paragraphs 1.32 to 1.36).

The proposed MM16 will now introduce a positive policy framework that will protect the biodiversity value of the consented ecological and landscape mitigation areas, but will allow changes to these areas where the developer provides alternative provision. This modification is consistent with national policy and it will ensure that the policy will not overburden future development and act as potential barrier to investment.

Despite this, PEL is very disappointed and highly concerned that the Council has not proposed to modify LP2 to allocate the Land to the East of Protos (“LEOP”) for employment purposes.

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PEL has engaged with every stage of the emerging LP2 and has presented a clear, compelling and evidence based case to demonstrate the allocation of the LEOP for employment development. The Representations Report – Land East of Protos (January 2018) (see Annex 1) articulates this case and a summary of the key points are set out below:

- The LEOP is a long-standing industrial allocation in successive Local Plans and it would be a serious retrograde step to remove it from the Council's employment land supply;
- The failure to allocate the LEOP for employment development means the LP2 is inconsistent with the objectives of the Core Strategy that promote economic growth and inward investment, and the thrust of national planning policy (as expressed in the National Planning Policy Framework) which makes clear that the planning system should proactively contribute to economic growth to achieve sustainable development.
- The LEOP represents a unique opportunity within the borough and sub-region, including in attracting large-scale inward investment. The removal of the LEOP from the identified supply will dilute its breadth and leave it qualitatively deficient;
- PEL has submitted sufficient environmental information to demonstrate that LEOP is suitable and capable of delivering a significant scale of development;
- There is no barrier to the development of the LEOP within the Plan period. However, if the land is not allocated in the LP2, then the likelihood of it being developed is effectively removed and the inward investment opportunity lost for a generation;
- By failing to cater for employment development including inward investment opportunities which the LEOP can uniquely accommodate and attract, the borough will lose out on significant socio-economic benefits (these are set out in full at Annex 1, page 24)

We trust that the information provided within this letter will be considered by the Council and the Inspector, and we welcome the opportunity to further promote the LEOP for future development.

Please do not hesitate to contact either Stephen Bell or myself should you have any queries relating to our comments.

Yours sincerely



Peter Rowe

Associate Director

