

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

Planning Policy

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our reference NP007

your reference:

please ask for: Charlotte Aspinall

date: 12 June 2026

Dear Sir/Madam

Cheshire West and Chester comments on the Submission Draft Christleton and Littleton Neighbourhood Plan (2026-2042)

1. Introduction – Christleton and Littleton Neighbourhood Plan

- 1.1 The Council welcomes the opportunity to comment on the Neighbourhood Plan and acknowledges the hard work of the Neighbourhood Plan Steering Group and local residents.
- 1.2 The statutory tests (basic conditions) for neighbourhood plans, (as amended by the Levelling-up and Regeneration Act 2023 (LURA) and brought into force in March 2026), provide the framework for independent examination. These basic conditions include considerations such as the relationship with national policy and guidance, the contribution to sustainable development, the impact on overall housing delivery, and compliance with relevant environmental requirements. In addition to the basic conditions themselves, the LURA introduced new statutory requirements relating to plan content, to be considered alongside the basic conditions. In particular, neighbourhood plans must, so far as considered appropriate:
 - Be designed to contribute to the mitigation of, and adaptation to, climate change;
 - Take account of any Local Nature Recovery Strategy (LNRS) applicable to the area.
- 1.3 The Council's comments below are intended to be constructive and to assist the examination process by identifying matters where it is felt that the Neighbourhood Plan could be improved in terms of clarity, format and scope and to assist in ensuring



that it is robust and capable of effective implementation. Comments are included from other teams within the Council where relevant including the Mersey Forest.

2. Christleton and Littleton Neighbourhood Area

- 2.1 The Christleton and Littleton Neighbourhood Area was formally designated on 2 February 2024. The Neighbourhood Area aligns with the area covered by both Christleton and Littleton Parish Councils in their entirety.
- 2.2 The Christleton and Littleton Neighbourhood Area includes the settlement of Christleton and Littleton to the east of Chester. The A51 (Tarvin Road) runs through the north of the Neighbourhood Area and the A41 (Whitchurch Road) to the south. The Shropshire Union Canal also runs through the area to the south of Christleton.

3. Local Plan context for Christleton and Littleton Neighbourhood Area

- 3.1 The Local Plan for the borough of Cheshire West and Chester (established as a unitary authority in 2009) has been developed in two parts. The Local Plan (Part One) Strategic Policies was adopted in January 2015 and sets out the strategic framework for development and land use planning in the borough. It can be viewed at [Local Plan \(Part One\) Strategic Policies | Cheshire West Planning Policy](#)
- 3.2 The Local Plan (Part Two) Land Allocations and Detailed Policies was adopted on 18th July 2019. It can be viewed at: [Local Plan \(Part Two\) Land Allocations and Detailed Policies | Cheshire West Planning Policy](#).
- 3.3 The Christleton and Littleton Neighbourhood Plan (Submission Version April 2026) has regard to both the Local Plan (Part One) and Local Plan (Part Two)
- 3.4 The spatial strategy of the Local Plan (Part One) STRAT 1 and STRAT 2 is to direct new development primarily to the four main urban areas of Chester, Ellesmere Port, Northwich and Winsford. This will enable the best use of previously developed land and allow the integration of homes, jobs, services and facilities in the most accessible locations. A lesser amount of development is directed to the 10 key service centres, which are identified in policy STRAT 8. Smaller local service centres (which includes Christleton) are identified in the Local Plan (Part Two) policy R 1. Other villages including Littleton are countryside (STRAT 9). Both settlements lie within the Green Belt (STRAT 9).
- 3.5 Other Local Plan policies relevant to the Neighbourhood Plan include those relating to the natural, built and historic environment, design and open space (Part One SOC 5, SOC 6, ENV 2, ENV 3, ENV 4, ENV 5, ENV 6, SOC6, Part Two DM 35, DM36, DM37 and DM 44).
- 3.6 The Council provided comments on the pre-submission (Regulation 14) consultation in December 2025, which are attached as Appendix 1.

4. Detailed comments on the submission version of the Christleton and Littleton Neighbourhood Plan

Page number or policy	Comments
Maps	All OS maps including the Neighbourhood Plan Area map on page 3 require an OS licence number.
General comment Section 6.1	There are two policies numbered HN4, therefore the policies within this section will need renumbering.
Policy HN1 - Housing Need	General comment – the graphs have been inserted as images, so they appear blurred and the data isn't legible. The policy wording is a statement about the housing needs survey and not a land use planning policy. Strategic Housing comments: The Local Housing Needs Survey methodology has been approved by Strategic Housing, and it is agreed there is an unmet need for 15 Affordable Homes for local households. The survey did however identify significant demand from households on the Housing Register who may not have a local connection to the Neighbourhood Plan area but are seeking Affordable/Social rented accommodation there. It is recommended this demand for an additional 74 Affordable Rented homes is acknowledged on page 11 of the Plan.
Policy HN2 – Housing Density	The last sentence of the policy states that schemes that exceed the average density of 16dph or the maximum land area of a hectare should be refused. This requirement may prevent small developments – for example of one or two houses if they have relatively small gardens. This may prevent infill developments in some locations and could reduce opportunities for development of housing in the Neighbourhood Area. As such, this could conflict with the basic conditions. How has the density of 16dph been arrived at/evidenced? Does this conflict with the requirement in policy HN3 that 'all new development must achieve an efficient use of land? Likewise, does this requirement meet the basic condition of contributing to sustainable development'? If the existing village has a density range of 6-26 dwellings per hectare, are there parts of the village where higher densities would be suitable? The policy only applies to 'available and deliverable' sites – it is unclear how this would be assessed? The policy only applies to houses, not flats? Suggest 'a brownfield' or 'a greenfield' site needs adding. The policy refers to sites "immediately adjacent to the village". It must be clearly defined which 'village' this policy applies to. Is it just Christleton or does this include Littleton as well? Policy HN4 refers to 'Villages' in the context of rural exception sites).

	Does the density requirement apply just to sites adjacent to Christleton and Littleton or the whole of the Neighbourhood Area? The wider Neighbourhood Area (e.g. immediately to the east of the Chester built up area) will have a different local context than the villages themselves. The policy only applies to applications where housing density is a maximum of 16 dwellings per hectare. Not clear whether the last sentence applies to just housing schemes meeting the other requirements or all schemes.
Policy HN3 – Brownfield or Greenfield Development	This policy states that all new development must achieve efficient use of land. As with our comments on policy HN2 above, we would question whether an average density of 16 dwellings per hectare achieves an efficient use of land and meets the basic condition of contributing to sustainable development? Unclear how this policy would apply if the site was both greenfield AND brownfield? Suggest that more explanation of what ‘co-located’ means is given.
Policy HN4 – Rural exception sites (There are two policies HN4 – needs renumbering)	This policy is very general and doesn’t explain how it specifically relates to rural exception sites. It should provide more detail or refer to policy DM 25 in the Local Plan (Part Two). ‘Several houses’ needs defining – how many? This policy says ‘adjacent to the village’ – which village? Will the housing needs identified in the report presented at policy HN1 be met on rural exception sites?
Policy HN4 – Infill and backland housing	The wording of this policy is slightly confusing and it isn’t clear whether it aims to prevent all infill and backland housing. It also refers to ‘occasional spaces in the villages backland’ – it isn’t clear what that means. If the policy is intended to restrict infill development, this would conflict with the NPPF in relation to allowing limited infill in Green Belt villages. Reducing opportunities for development of housing in the Neighbourhood Area could also conflict with the basic conditions on housing delivery.
Policy HN5 – Repurposing of empty buildings	This policy refers to priority being given to conversion of properties to facilitate occupation. It isn’t clear whether this means residential use. Residential use may not be suitable in all locations – for example if a pub or shop was empty. Unclear what ‘priority’ means? Does this only apply where there are two applications, one for demolition and one for re-use?
Policy HDC1 – General Housing	This policy includes large amounts of descriptive text, which could be removed.

Policy HDC2 – green infrastructure	Unclear how this can be achieved in the context of the villages? For example, could an application for a single-storey extension strengthen wildlife corridors?
Policy HDC3 – Trees and Planting	Unclear what ‘mature tree’ means. Comments from The Mersey Forest: “We strongly support greater alignment between the Neighbourhood Plan and The Mersey Forest Plan and its accompanying Tree Atlas. We recommend setting local tree cover targets, aspiring to the 3:30:300 principle for trees in settlements, and targeting tree planting and enhancing green infrastructure, public spaces, and rights of way to benefit climate resilience, biodiversity, health, air quality and flood management. Please refer to The Mersey Forest Plan, Tree Atlas, and Local Nature Recovery Strategy to guide planting, habitat enhancement and to enable funding opportunities through planning and partnership working”. An online representation has been submitted with our full response to the consultation Plan.
Policy HDC4 – Biodiversity	Suggest this policy should specify that it relates to new/proposed homes.
Policy HDC5 – Water and drainage	Suggests this policy needs clarification that SuDs would not be appropriate for ALL new development.
Policy HDC7 – Public spaces	Question in what circumstances ‘must’ public spaces be provided? By whom?
Policy HDC 16 Minimum space standards	The reference to New Design Guidance is a Government consultation, launched in January 2026 and the outcome of this is still to be published. Whilst there is an indication that the terms ‘Liveability’ and ‘Built Form’ within the guidance may be considerations in the future, we do not know what the outcomes are. Policy HDC16 misinterprets the January 2026 draft Design and Placemaking PPG. References to “Liveability” and “Built Form” are qualitative design principles intended to guide good design outcomes, not prescribe mandatory internal floorspace standards. The draft guidance contains no requirement to exceed NDSS or adopt fixed minimum room sizes. Similarly, the policy applies the Mayor of London’s 2023 Housing Design Standards LPG outside the London context. These standards were developed to address London-specific issues including high-density flatted development, overcrowding pressures, limited private amenity space, home working, single-aspect homes, and reduced internal living quality. The standards are identified as “best practice” guidance, not mandatory national policy requirements, and are supported by London-specific evidence, viability assumptions, and strategic planning powers which do not automatically apply elsewhere.

Design Code (please also refer to the detailed comments made by the Council through the Regulation 14 consultation at Appendix 1 below).	Some sections of the code say, ‘development must...’, but it isn’t clear what types of development would be included. For example, Policy HDC2 states that ‘Development must strengthen existing wildlife corridors by creating green spaces and habitat that connect into the surrounding countryside’. That would be acceptable for a large housing scheme, but would be an unreasonable requirement for a development for a single dwelling, house extension or change of use from a shop to a hot food takeaway for example. It is suggested that the wording should be amended so it is clear what types of development are covered by each requirement (or what wouldn’t be covered). As raised in the Council’s Regulation 14 comments (below), it is considered that the ‘shoulds’ and ‘musts’ relating to materials and products (e.g. natural slate, specialist timber windows and cast iron) may be ambitious outside the Conservation Area, due to the relatively high costs. HDC8 – states that new developments must include squares, parks and greens. This does not align with the Cheshire West and Chester Open Space Study bandings of 10 or more dwellings triggering onsite open space provision. Policy HDC12 – The garage size requirements exceed those in the Council’s adopted parking standards for cars and other vehicles Supplementary Planning Document: Parking Standards - Updated February 2022. We would comment here that there may be a conflict with policy HN3 that ‘all new development must achieve an efficient use of land’? Likewise, does this requirement meet the basic condition of contributing to sustainable development’? Policy HDC14 states that ‘blocks should be between 50-100m long to create a permeable layout’. Suggest that it would be more appropriate to state a maximum of 100m to accommodate for a scenario where there are smaller sites providing only 2 or 3 dwellings for example? Suggest that the terminology used throughout the design code should be explained in the main glossary, or in a separate design code glossary. For example: door heads, string course, cornices etc. Policies HDC26 and HDC27 - this is a separate section on extensions and non-residential and mixed-use buildings. It is not clear whether this is the only part of the code that applies to extensions / non-residential developments. Could also refer here to the Council’s Supplementary Planning Document: House Extensions and Domestic Outbuildings: House Extensions and Domestic Outbuildings SPD (January 2021).pdf Policy HDC 26 – unclear what is meant by ‘extensions... should not be overlooked’? Also, ‘should not infringe on... privacy’ is very onerous
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	without qualification. Any new rear window could be considered to infringe on the privacy of a neighbouring rear garden in an oblique view. Policy HDC 27 - 'Non-residential and mixed-use buildings must have active frontages. The exception to this would be industrial or agricultural buildings outside the settlement boundary'. Suggest that there could be other exceptions – e.g. offices or other businesses that don't have regular visitors? Suggest that there is a lack of distinction between context analysis, design guidance, and true, quantitative code. This detracts from the latter. There is also a lack of clarity over which types of development many of the code sections apply to – e.g., a single-storey rear extension couldn't be expected to include SuDS. There is some repetition of the borough wide code, and this may be best to be omitted. Policy HDC28 – suggest clarification is given on what 'retrofit' means in a planning context. Policy HDG29 – 30 – suggest that the restriction on south facing roofslopes that face the street conflicts with Permitted Development rights and it is unsustainable to prevent solar panels. Policy HDC3 – <i>'Mature trees, hedgerows and ponds must be retained and could be used to anchor green spaces'</i> – Suggested that in some cases, existing trees, hedgerows or ponds are low-quality and their removal can be justified from a design perspective to allow for a better layout than would be possible if retained. Page 40 – Sustainability – is this intended to be a separate policy within a policy box?
Design Code	Comments by the Council's Strategic Waste Team: "the Waste department would like to stress the importance of all homes having space for adequate waste containers that ideally should be stored out of site on the curtilage of the property, avoiding steps for safe presentation of bins on collection day. The example provided in the proposals (top image of a terrace with steps in Tarporley on page 30) would require a separate rear space to store bins and level access to the property in the event the property occupants qualify for assisted waste collections in future. Residents would have to wheel their bins to a front of street collection point if they did not qualify for assistance. We would not advocate residents storing waste at the front of the property due to the steps".
Policy SUC 4 Biodiversity Buffer	"In line with national policy requirements, development must also deliver a Biodiversity Net Gain of 10%, within the Neighbourhood Plan area": The statutory BNG requirement is based on legislation, not policy. The national requirement does not have any locational restrictions and further evidence would be needed to support this. In terms of the CWAC Borough, DM44 supports up to 0% (no net loss) in the Borough and this

	would have to be built on with evidence to be developed more locally, to restrict developers to providing 10% BNG in the Neighbourhood Plan area, as this is a potential conflict with the statutory system. “The Statutory Biodiversity Metric requires that planning applications that include land within the site boundary that is within 10m of a canal or river are supported by an assessment of the baseline condition of the watercourse. Unless exemptions apply, in these circumstances, developers must deliver a minimum 10% net gain in watercourse biodiversity units.”: It is not clear why repeating some of the legislative guidance is required here?
Policy HWB1 Health and well-being	This policy is generally a copy of policy SOC 5 Health and well-being of the Local Plan (Part One). Suggest the first sentence needs rewording to clarify that all proposals may not necessarily be supported if they meet the health and wellbeing criteria of the policy.
Policy GG 1-5 Green Gaps	The new Local Plan and its supporting evidence base (including a Green Belt assessment) is currently in the early stages of preparation and therefore it is not yet known what the strategy for the new Local Plan and Green Belt will be. The Neighbourhood Plan Area adjoins the urban area of Chester that is currently identified as one of the areas where in line with the current Local Plan strategy most new development should be located. Whilst no decisions have been made on the new Local Plan strategy the Council is mindful these decisions have yet to be taken. As a general comment and as raised in the Council’s comments at Regulation 14, the Green Gaps must not undermine Local Plan flexibility or introduce blanket prohibitions that conflict with NPPF’s exceptions for development in Green Belt. Similarly, the Neighbourhood Plan must meet the new Basic Condition so as not to: <i>“result in the development plan for the area of the authority proposing that less housing is provided by means of development taking place in that area than if the neighbourhood development plan were not to be made”.</i> As the Green Gaps prevent housing development, due to their scale and location, they limit options for housing development in the area and could result in less housing taking place in the area than if the Neighbourhood Plan were not to be made. It is noted that the plan references that adjoining Parish Councils / Neighbourhood Plan areas would also be looking to extend the gaps to cover their areas (e.g. Policy GG3 – Land separating Littleton from Guilden Sutton).

	This policy prevents housing development only – would other types of development be restricted in a green gap?
Policy HE1 – Christleton Conservation Area	Suggest that the requirements within this policy should also align with national and Local Plan policy for development within Conservation Areas.
Policy HE3 – The Battle of Rowton Heath	Introduces the concept of ‘damage’ which is not aligned with national or local heritage policy.
Policy LGS 1-11 – Local Green Spaces	The second paragraph refers to the criteria the green spaces have been assessed against. This doesn’t need to form part of the policy.
Section 6.7 Incidental Green Spaces	Suggest there should be a definition of incidental greenspaces within the glossary as it currently isn’t clear what they are. Clarification required as to whether policy SOC6 of the Local Plan (Part One) would apply to them. Suggest including a definition of what a pocket park is in the glossary.
Policy CF2 – new or improved community facilities	Unclear how the how the ‘expressed needs of community’ can be demonstrated?
Policy CF4 – Community facilities not permitted	Whilst the Council recognises the intention behind Policy CF4 to protect residential amenity and local character, particularly in relation to noise, disturbance, and anti-social impacts associated with certain uses, as currently drafted this policy is overly restrictive. National planning policy requires that neighbourhood plans support sustainable growth and avoid placing unjustified limitations on appropriate development. A categorical ban on specific use classes or business types risks conflicting with the requirement to support a diverse local economy. The policy does not sufficiently demonstrate that these uses would be unacceptable in all circumstances across the neighbourhood area.
Policy PROW2	Policy PROW 2 can only be deemed to be aspirational as it is on private land and the landowners would have to consent to having the route upgraded from a footpath to a Bridleway. The path is currently through agricultural fields, and the surface is grass, any change to the surface to make it all weather would not be in keeping with the surrounding area. There is not enough detail provided to comment on reinstating the footpath from the Canal to the A41. It is not known if this refers to an existing PROW that need to be maintained or is it a permissive path?

Policy CWT 2	“Enhancement of wildlife corridors may be facilitated by opportunities arising through the planning process (e.g. BNG or other ecological compensation via Section 106 Agreements or Planning Conditions),”: The statutory BNG regime does not involve the Council securing levies for BNG.
	Comments from the Council’s Strategic Transport Officer: 4. Vision: Mention of presumption in favour of sustainable development as “limited by the highways network” needs to be aligned to the approach set out in NPPF, as noted elsewhere in the plan. Highways impacts alone do not limit the presumption in favour of sustainable development, especially where appropriate mitigation is proposed. • Policy HDC3 - “one semi-mature tree must be planted per dwelling” – suggested that this is too broad-brush, not taking into account existing trees, available space or impacts on the broader sustainable design of the development. Would recommend this is revised to “wherever possible, at least one semi-mature tree should be planted per dwelling”. • HDC12 (car ownership) we would encourage inclusion of the latest car ownership rate statistics. Car ownership in Christleton and Huntington ward is 1.6 cars per household, according to the 2021 Census.
Policy LV1 - Landscape	Local Views General comment: the map on page 71 is poor quality and at a scale which is difficult to see the detail and location of the footpaths. A map number and title and a reference to the relevant supporting policy would also be helpful. Whilst the intention of this policy to protect locally important views, vistas and skylines is supported, the requirement for development to “enhance” views and skylines maybe considered overly onerous. National policy generally seeks to conserve and, where appropriate, enhance valued landscapes, rather than requiring enhancement in all cases. It would also be beneficial if the identified views included additional information to explain the view, the value of the view, the character, heritage, and sensitivities of the view and why they are important. This should also include information such as where the viewpoint is experienced from i.e. Public Footpaths etc.

	Suggest that Part 1 of the Council's Landscape Strategy good design principles (refer to p 9-14) is referenced here as well as the "General Design Guidance Principles for New Development" and "Checklist for Applicants". Reference to the CWaC Landscape Strategy 2026 is also suggested here: Open countryside surrounding Christleton and Littleton is located within: • Landscape Character Type: LCT 9: Cheshire Plain West • Landscape Character Area LCA 9d: Saughall to Waverton Plain. The documents offer guidance on: - Key Landscape Characteristics - Key Landscape Sensitivities , Qualities and Value - CWaC Local Plan policies with an influence on the character of LCA 9d: Saughall to Waverton Plain - Forces for Landscape Change - Overall Landscape Management Strategy for LCA 9d: Saughall to Waverton Plain - Landscape and Built Development Guidelines
Policy INF1 – Sewerage and Drainage	The wording of this policy should be amended as it currently states: "New development will only be supported where "there is insufficient capacity in the local sewerage system -" The wording doesn't currently make sense. It could also be interpreted as requiring refusal of any applications for a substantial number of houses, even if wastewater treatment capacity is proposed to be improved in future to meet any demand and therefore in that sense is overly restrictive and could conflict with the basic condition of restricting housing delivery.

I hope these comments are of assistance in the examination of the Christleton and Littleton Neighbourhood Plan.

Yours faithfully

Charlotte Aspinall

Senior Planning Officer, Planning Policy Team

Attached:

- Appendix 1 – Council's response from pre-submission (Regulation 14) consultation
- Cheshire West and Chester Part 1 Landscape Strategy good design principles.
- Cheshire West and Chester - Landscape and Built Development Guidelines

Appendix 1 – Council’s response from pre-submission (Regulation 14) consultation:

CWAC Comments – Draft Christleton and Littleton Neighbourhood Plan – December 2025

Section/Policy	Comments
Front cover	Please include the plan period on the front cover. This is a requirement when the Plan is examined.
Plan period	“This NP will take full effect from the date on which it is made until the end of the next local plan period 2027-2042” It should be noted that the Plan period for the new Local Plan has not yet been set and therefore may not follow the same period as stated above.
General comments	On 16 December 2025, the UK government published a consultation on proposed updates to the National Planning Policy Framework (NPPF). This consultation aims to introduce significant reforms to the planning system, including: • A permanent presumption in favour of suitable development, which will apply to all development proposals within settlements unless specific conditions are met. • The introduction of a new "medium" category for sites, which will facilitate the development of smaller plots. • Changes to biodiversity net gain regulations, with exemptions for smaller sites. • The integration of National Development Management Policies (NDMPs) into the NPPF, intended to streamline the planning processes. The consultation is open until 10 March 2026 and can be viewed via the following link: National Planning Policy Framework: proposed reforms and other changes to the planning system - GOV.UK The policies throughout the neighbourhood plan should be clearly named and distinguished from the supporting text/justification text by using a policy box and the policies should be listed (with a policy number and name) in the contents page. There are several policies throughout the document that are not written as land use policies or are copies of the Local Plan policies. Policies in a Neighbourhood Plan should not repeat Local Plan or national policy/guidance. The Locality guidance includes the following guidance for writing planning policies which might be helpful: “Policies should be written to give substance to the plan’s aims and vision and help local planning authorities make decisions on planning applications in the neighbourhood area. Each policy should include a statement of purpose, a summary of relevant evidence and clear planning rationale (the thinking behind the policy), and the wording of the policy itself. The convention is for the policy itself to be in bold text. Policies may also be accompanied by explanatory text or by

	more detailed guidance to help make their interpretation clear. This will help to ensure the policies are applied as intended when they were written” NP Roadmap online full (5).pdf The use of the orange text boxes throughout the document is inconsistent and confusing. Some include policy justification text and some include selected paragraphs that are contextual text.
Section 6 Policy H1 - Scale of Housing Development	General comment – the graphs have been inserted as images, so they appear blurry and the data isn’t legible.
	There is currently no distinction between the policies that are relevant and appropriate for the two villages in the Neighbourhood Area; Christleton (which is a local service centre) and Littleton (which is countryside). This comment extends to the rest of the Plan and should be considered throughout.
	As the new Local Plan and its supporting evidence base is currently in the early stages of preparation it is not yet known what the strategy for the future growth of Chester and smaller settlements within or adjoining the Green Belt will be. It is therefore suggested that we discuss the proposed housing cap of 6 units before you submit your Neighbourhood Plan. In the meantime, we have the following general comments on your proposed policy approach: The policy sets a cap for developments of up to 6 units – is this based on density of the village(s), character etc? Further information should be provided to justify the figure chosen. The policy refers to brownfield or greenfield sites immediately adjacent to the settlement (for a maximum of 6 new houses, presumably allowing market housing). Sites adjacent to a settlement would be subject to Local Plan (Part One) policy SOC 2 and would be classed as a rural exception site which the NP also refers to in policy H1 using the same criteria. It is suggested that the absolute unit cap within policy H1 could be replaced with a criteria-based policy to guide housing development in the Neighbourhood Area e.g. character, access, infrastructure. Compliance with NPPF - Introducing a fixed cap may conflict with the NPPF requirement to plan positively for growth and maintain flexibility. Implementation - Clarify whether proposals exceeding 6 units would be automatically refused. If so, provide a clear rationale for why developments of 7 or more units would be inappropriate.

	- Consider whether the cap supports efficient use of land and meets the need for smaller homes. Larger applications on the edge-of-settlement are likely; the policy must therefore be defensible if refusals for such developments are to be refused. Consistency - Page 11 states that developments of 6 homes or more must include communal spaces (e.g., squares, parks, greens). This contradicts the housing cap of 6 units. The relationship between the policy requirements and the Design Code should be resolved. Infill Development The Local Plan definition of infill development is the ‘filling of a small gap, up to two dwellings, in an otherwise built-up frontage in a recognised settlement’. Does the policy mean that all backland proposals should be refused? Rural Exception Sites As above, the draft wording introduces a numerical threshold (6 units) without clear evidence or justification. This could conflict with the NPPF requirement to plan positively for growth and maintain flexibility. Overall, the housing policies should be written as land-use policies, not descriptive text, and avoid duplicating Local Plan or national guidance. Clear policy boxes with concise wording will help ensure conformity and usability during the development management process.
6.2 Housing Design	This section needs a land use policy relating to the design code e.g. “To ensure all new development within the Neighbourhood Area reflects local character, promotes high-quality design, and contributes to creating sustainable, attractive places, development proposals must
Design Code	As drafted, the full design code is included within the NP. As such, it isn’t clear which parts of the design code are policies and which are explanations. This would make it more difficult for applicants to understand the importance of the code and for colleagues in the Development Management team to use the code to require design amendments to schemes or recommend refusal of schemes if necessary. It is suggested that the design code is attached as an appendix to the NP instead and a policy is included within the Plan to refer to the design code. The policy could be worded in a similar way to the one within the Dunham on the Hill and Hapsford NP, which states: “Policy DHH 4 – Dunham and Hapsford Design Code Development proposals must have regard to the design guidance and must comply with the design coding of the Dunham

and Hapsford Design Guide & Code as appended, as a separate document, to the Neighbourhood Plan.”

Some sections of the code say ‘development must...’, but it isn’t clear what types of development would be included. For example, on page 9 it states that ‘Development must strengthen existing wildlife corridors by creating green spaces and habitat that connect into the surrounding countryside’. That would be acceptable for a large housing scheme, but would be an unreasonable requirement for a development for a single dwelling, house extension or change of use from a shop to a hot food takeaway for example. The wording should be amended so it is clear what types of development are covered by each requirement (or what wouldn’t be covered). Some sections refer to new developments of 6 homes or more -are there other sections this would apply to?

On page 11 it states ‘New developments of 6 homes or more must include squares, parks and greens or other communal gathering spaces that encourage neighbourly interactions and community uses’. Should this be ‘squares, parks and/or greens’ – as a development wouldn’t necessarily be expected to provide all three types?

It would be helpful if it could be made clearer which parts of the design code section are the ‘codes’ and which are just examples of positive design. The code parts could go in boxes; but would need to be differentiated from policies. This would make it easier to identify what needs to be complied with.

On page 15 it states that car parking on existing and new developments must provide ‘garages designed to reflect the architectural style of the house they serve’. This makes it sound as though garages have to be provided in all developments, which we assume wouldn’t be necessary. It also refers to car parking on existing developments – how would these requirements be implemented on existing developments?

On page 15 it states that garages should be a minimum of 3 x 6.5m (single) or 5 x 6.5m (double) in size. This is different to the requirement in the parking standards Supplementary Planning Document of 3.3 x 6m (single) and 5 x 6m (double). Policy T5 in the Local Plan (Part Two) is a strategic policy and refers to the need for parking facilities to have regard to the Council’s latest adopted parking standards for cars and other vehicles. As such, the current wording of the design code isn’t in general conformity with the strategic policies contained in the development plan. If the wording was changed to ‘could’ rather than ‘must’, then it may be considered to be in general conformity.

On page 17 it states that ‘blocks should be between 50-100m long to create a permeable layout’. Would it be better to say a maximum of 100m? Would a block less than 50m be acceptable? If not, what would happen on small sites providing only 2 or 3 dwellings for example?

The table on page 18 is confusing and needs more explanation. What does '1b' and '1p' mean (bedroom / person)? For 1b on the first row it says 39/37, then 43/41 – what is the GIA and what is storage? Is the information in blue the new requirement? Are you asking for the best practice example?

On page 19 it states that the building frontage should be continuous and uniform. This suggests the buildings need to be in a terrace, with no gaps. If that's incorrect, then this should be explained more clearly. If it just means that buildings should all face in the same direction, this could just be stated. What happens on a corner? Does a property need two main frontages?

The terminology used throughout the design code should be explained in the main glossary, or in a separate design code glossary if it becomes an appendix to the main NP. For example: door heads, string course, cornices etc.

Page 27 – the text 'Affordable housing is disbursed through a development in Poundbury, Dorset' is repeated before and after the diagram.

On page 28 there is a separate section on extensions and one on non-residential and mixed-use buildings. Is this the only part of the code that applies to extensions / non-residential developments, or would others also apply? Could refer here to the Council's Supplementary Planning Document: House Extensions and Domestic Outbuildings: [House Extensions and Domestic Outbuildings SPD \(January 2021\).pdf](#)

On page 28 it states 'Non-residential and mixed-use buildings must have active frontages. The exception to this would be industrial or agricultural buildings outside the settlement boundary'. Would there be other exceptions – e.g. offices or other businesses that don't have regular visitors?

There is a lack of distinction between context analysis, design guidance, and true, quantitative code. This detracts from the latter. There is also a lack of clarity over which types of development many of the code sections apply to – e.g., a single-storey rear extension couldn't be expected to include SuDS. There is some repetition of the borough wide code, and this may be best to be omitted - the value of settlement specific codes is that they can help to make development reflect local nuance.

Mature trees, hedgerows and ponds must be retained and could be used to anchor green spaces. In some cases, existing trees, hedgerows or ponds are low-quality and their removal can be justified from a design perspective to allow for a better layout than would be possible if retained.

New developments of 6 homes or more must include squares, parks and greens or other communal gathering spaces that encourage neighbourly

	<i>interactions and community use. These spaces will strengthen the calm, rural character of Christleton and Littleton.</i> 6 is a very low (and possibly unrealistic) threshold to trigger public space within a development, and in the case of some sites it may not be appropriate. For example, should a terrace of 6 dwellings on an infill plot in the centre of the village necessarily have public space within the red line? <i>All developments of over 10 homes must include safe, well-overlooked routes for walking, wheeling and cycling.</i> Does this mean 'multiple' routes? There is also a lack of clarity over the definition of 'route'. As currently worded, a scheme could be a cul-de-sac with one way in and out for all modes and it would accord with the policy. The 'shoulds' relating to materials (e.g. natural slate and cast iron RWGs) may be ambitious outside the Conservation Area, due to the relatively high costs.
Between p28-29	There is a page with the consultation questionnaire and QR code between these pages in error.
6.3 The Shropshire Union Canal	Policy SUC 1 – it needs to be made explicit that this policy relates to development proposals adjacent to waterways and not just 'general development' as the title suggests.
Policy SUC 1 General Development	The policy wording is a copy of Policy DM 38 - Waterways and mooring facilities in the Local Plan (Part Two) and relates to borough wide waterways and therefore not relevant to the neighbourhood plan area. This policy should be re-written to make it locally specific or deleted.
Policy SUC 2 Heritage	It should be made clear in the policy title that it relates to heritage assets along the canal and is different from the heritage policies within section 6.8 of the Neighbourhood Plan. Land use policy wording is needed and should be made explicit within a policy box. The paragraph "Any development should safeguard the heritage value of the local Canal Conservation Areas and Listed Structures, and protect the historic significance of the canal corridor" could be used as policy text.
Policy SUC 3 Ecology	It should be made clear in the title that this policy only relates to ecology of the water course. Again, this needs to be written as a land use policy to make the requirements locally specific and should not repeat national or local planning policy/guidance. The Council's BNG requirements are set out in the following guidance: Biodiversity net gain requirements Cheshire West Planning Policy DM44 (Part 1) (Para 16.13) – this reference should be Local Plan (Part 2), para 16.3)

Policy SUC 5 Health and well-being	This policy is a copy of policy SOC 5 Health and well-being of the Local Plan (Part One). The policy should be re-written to make it locally specific or deleted as the Neighbourhood Plan should not repeat national/local policy and guidance.
Policy SUC 6 Green Infrastructure	This 'policy' currently includes a definition of green/blue infrastructure and the benefits of the Shropshire Union canal and needs to be written as a land use policy. Comments by the Council's Green Infrastructure Officer: Suggest there should be a definition of incidental greenspaces within the glossary as it currently isn't clear what they are. Would policy SOC6 of the Local Plan (Part One) apply to them? Where is LGS11 on the open space map page 35? Has it been omitted or is it just very small and not obvious on the map? Part of Chester Rugby Club appears within the NP boundary map, (right hand side of Hare Lane) does this need referencing to protect from development? Similarly, part of Vicars Cross golf course is shown within the Neighbourhood Plan boundary. Does this also need referencing to protect it from any potential future redevelopment? Is there a definition of what a pocket park is and include in glossary? Page 11, references 6 homes will include a square, greens or parks. This does not align with open space study bandings of 10 or more dwellings triggering onsite open space provision. This sentence will need amending to reflect design guidance for a green, so it's clear that 6 houses do not trigger onsite park provision.
Policy SUC7 Moorings	The policy wording is a copy of Policy DM 38 - Waterways and mooring facilities in the Local Plan (Part Two) therefore this policy should be re-written to make it locally specific or deleted. Justification to SUC7 should read DM38 (not DM37). Part of the justification reads as though it is a policy.
Policy GG 1-5 Green Gaps	The new Local Plan and its supporting evidence base (including a Green Belt assessment) is currently in the early stages of preparation and therefore it is not yet known what the strategy for the new Local Plan and Green Belt will be. It is therefore suggested that we discuss the designation of the proposed 'green gaps' within the Neighbourhood Plan further before your Plan is submitted. As a general comment at this stage the Green Gaps must not undermine Local Plan flexibility or introduce blanket prohibitions that conflict with NPPF's exceptions for development in Green Belt.

	The Examiner might consider that the proposed Green Gap designations in the Neighbourhood Plan repeat Green Belt purposes and may therefore been seen as unnecessary, overly restrictive and therefore not justified. Evidence Requirement: Designations need robust justification (landscape character, settlement separation studies). Without this, the Examiner may conclude they fail the basic conditions. Policy Wording: Must be written as land-use policies, not descriptive text.
Section 6.5 & 6.6 Local Green Space and Incidental Open Space	These sections require a policy relating to the Local Green Space and incidental open space designations. For example: “The following sites are designated as Local Green Spaces, in line with NPPF paragraphs 106 - 108 and Local Green Space guidance in PPG. Inappropriate development will not be permitted in Local Green Space except in very special circumstances”.
Section 6.7 Conservation corridors and wildlife reserve	Section header typo – ‘corridor’ should read corridor. Is it intended that there will be a land use policy associated with conservation assets (C1-C4) that are described in this section? Comments from the Council’s Principal Natural Environment Officer: General: • It is not clear why tributaries to back Brook are not included in the Wildlife Corridor mapping? • As a large area of the rare priority habitat “Coastal Floodplain Grazing Marsh”, has been identified in the plan area, it may be advisable to have a policy covering this? • It is appreciated that wildlife is also mentioned through green space policies as well.
Heritage	Comments from the Cheshire Archaeology Planning Advisory Service (advice note attached) The authors of the Plan make clear that heritage is an issue which has been a key concern during its compilation. This is confirmed in the Introduction, where Bullet Point 6 notes that heritage was identified as one of the Plan’s key priorities during stakeholder engagement events. This interest is also reflected in Section 2 of the Plan, where a history of the settlements and landscape within the Plan area is given. Heritage is considered in more detail in Section 6.8 of the Plan, which includes two policies: HE1 concerning the Christleton Conservation Area and HE2 concerning the re-use of historic buildings. These policies are both concerned with the historic built environment, an area that the authority’s conservation officers will be able to advise on. This emphasis on the historic built environment is also reflected in two reports which have been prepared in support of the Neighbourhood Plan: the Christleton Heritage

	Assessment and Non-Listed Heritage Assets. The latter does include a number of heritage assets which might be termed archaeological such as the Abbot's Well and a number of historic lanes, but, as with the proposed policies, both reports are largely concerned with the historic built environment. This emphasis is entirely appropriate as the content of the plan is a matter for the authors but it may be noted the Plan area contains numerous archaeological heritage assets ranging from the prehistoric to the post-medieval period, including a number of Roman practice camps to the south of the A51, which are designated as Scheduled Monuments. Should the authors of the Plan wish to include more information on this aspect of the historic environment, the Archaeology Planning Advisory Service (APAS) will be able to provide more information from the Cheshire Historic Environment Record which may be consulted via this email address: hbsmradmin@cheshirewestandchester.gov.uk
Policy CF1 Existing community facilities and assets	The policy wording should be clearly distinguished from the explanatory text using a policy text box.
LE1 - Supporting Homeworking	The policy is currently written as though there would be a change of use of properties to small businesses rather than residents working from home. There is not a separate planning use class for homeworking, so it is unclear how this policy would be implemented. Criteria could be included in the design or new housing policies or could consider a policy on live-work units if this is what it relates to? There are different processes for advertisement consent/signage. Could consider including the broadband points into policy LE3.
LE2 - Supporting small scale business development	The policy wording should be clearly distinguished from the explanatory text using a policy text box.
Policy CWT 1	The policy wording should be clearly distinguished from the explanatory text using a policy text box. Policy CWT 1 Any development adjacent or in close proximity to these areas must incorporate substantial mitigation to minimise the residual effects on wildlife while also seeking to enhance the overall condition of habitats in order to achieve a measurable net-gain for biodiversity. It is not clear what "close proximity" would mean, so this would need further definition.

	Justification Biodiversity net gain will become increasingly important during the lifetime of this plan and where Biodiversity Net gain is levied within the plan area consideration should be given first to investing in local projects that benefit the local area. It is unclear why the justification for this policy only relates to biodiversity net gain, when some of the measures are not elements measured by biodiversity net gain. Although ideal, there is no mechanism for using BNG “levies” (it is assumed this means off-site BNG units?). Possibly “any BNG investment should be directed towards wildlife corridors” as an alternative? BNG Investment is again mentioned in Policy CWT2 below, so this may need consolidating? Possibly a more general justification for biodiversity enhancement in CWT 1 would be more appropriate, using NPPF or LPP2 DM44 reasoning.
Policy CWT 2	The policy wording should be clearly distinguished from the explanatory text using a policy text box. Policy CWT 2 Enhancement of the corridor may be facilitated by opportunities arising through the planning process (e.g. BNG or other ecological compensation via Section 106 Agreements or Planning Conditions), through government incentives (such as agri-environment schemes) or through the aspirations of the local community working with local businesses and landowners. It is not clear which “corridor” this refers to?
6.14 Local Views Landscape Quality, Countryside and Open Views	The policy wording should be clearly distinguished from the explanatory text using a policy text box.
	Comments from the Council’s Strategic Transport Officer: Mention of presumption in favour of sustainable development as “limited by the highways network” needs to be aligned to the approach set out in NPPF, as noted elsewhere in the plan. Highways impacts alone do not limit the presumption in favour of sustainable development, especially where appropriate mitigation is proposed. Welcome the inclusion of a design code, which aligns well with emerging proposals for a Borough wide Design Code being brought forward by Cheshire West and Chester Council. There are a couple of detailed refinements which I’d encourage the Parish to consider: • “one semi-mature tree must be planted per dwelling” – this seems like too broad-brush a rule, not taking into account existing trees, available space or impacts on the broader sustainable design of

	the development. Would recommend this is revised to “wherever possible, at least one semi-mature tree should be planted per dwelling”. • “All developments of over 10 homes must include safe, well-overlooked routes for walking, wheeling and cycling”. This size threshold seems too low if the intention is to require traffic-free or segregated cycle routes. A new route might not be needed through a small quiet development of 11 homes - using the street might be more sensible. We would recommend a broader policy along the lines of “All new streets should include footways, and developments should enable safe, well-overlooked walking, wheeling and cycling connectivity to everyday local destinations”. • “Car parking on existing and all new developments in the plan area must provide... Garages designed to reflect the architectural style of the house they serve”. Could be read to imply that every house needs to include a garage. Suggest this is reworded to “Where provided, garages should be designed to reflect...” • There are high levels of car ownership within the plan area” – rather than simply referring to high, we would encourage inclusion of the latest car ownership rate statistics. Car ownership in Christleton and Huntington ward is 1.6 cars per household, according to the 2021 Census. Where Policy GG1 notes highways impacts (e.g. increased demand for pedestrian crossing of the A41), it would be better aligned to the NPPF to note these issues would arise if development was brought forward without appropriate mitigation.
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Comments received from Active Cheshire (these comments are for information only and are not associated with the comments from CWaC officers above):

“I’ve reviewed the Christleton and Littleton draft Neighbourhood Plan and supportive of the approach being taken. In particular, the Plan appears to embed movement, walking and cycling, access to green and blue spaces, and inclusive design principles as part of its wider approach to sustainable development. From a high-level perspective, this aligns well with national policy and the strategic policies within the development plan, and I do not have any substantive comments to raise at this stage”.