



**TOWN AND COUNTRY PLANNING ACT
1990 (AS AMENDED)**

**REPRESENTATIONS IN RESPONSE TO
CHRISTLETON AND LITTLETON
NEIGHBOURHOOD PLAN
REGULATION 16 CONSULTATION**

JUNE 2026

OUR REF: HAN10440/2

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INTRODUCTION

- 1.1 This statement provides representations on behalf of Brampton Strategic Land and R and C Handley in response to the Christleton and Littleton Neighbourhood Plan Regulation 16 consultation document ('the Neighbourhood Plan').
- 1.2 Representations are set out below in response to specific draft policies in the Neighbourhood Plan.

RESPONSE TO NEIGHBOURHOOD PLAN POLICIES

Policy HN1 – Housing Need

- 1.3 The supporting text to draft policy HN1 states that new housing must be limited to the local needs of residents. Draft policy HN1 sets out that a local survey undertaken identified a need for 12 homes, plus 3 applicants on the housing register with a local connection.
- 1.4 Under national planning policy, at the local planning authority-wide level local, housing need is required to be calculated via the standard method. This figure represents the minimum number of homes that are required to be planned for across a local planning authority's area through a Local Plan. As set out in national planning guidance, the standard method applies a formula incorporating the baseline housing stock for the borough, adjusted upwards to reflect local affordability issues. The current standard method figure for Cheshire West and Chester is 1,914 dwellings per annum. Cheshire West and Chester Council is therefore required under national policy to provide for a supply of sites to meet this housing figure, including an appropriate mix of housing types.
- 1.5 The basic conditions to be met at examination for a neighbourhood plan to proceed to referendum are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990. These include basic condition (a) to have regard to national policies and advice and basic condition (e) requiring that neighbourhood plans be in conformity with the strategic policies for the area and should not promote less development or undermine those strategic policies.
- 1.6 Under the heading '*What does having regard to national policy mean?*' the government's guidance for neighbourhood plans states "*A neighbourhood plan or Order must not constrain the delivery of important national policy objectives. The National Planning Policy Framework is the main document setting out the government's planning policies for England and how these are expected to be applied.*" (Planning Practice Guidance paragraph: 41-069)
- 1.7 Neighbourhood plans must therefore plan positively for housing and support strategic policies. As such it would be appropriate for the neighbourhood plan to include a policy to suggest housing will be supported in the Christleton and Littleton area where it meets the needs identified in the local survey or to identify suitable sites. As currently drafted however policy HN1 and the accompanying text instead seek to apply a limit to housing delivery in the neighbourhood plan area. We strongly object to this approach. It would run wholly contrary to the Government's objective set out in National Planning Policy Framework (NPPF) paragraph

61 of “*significantly boosting the supply of homes*” and seeks to constrain delivery under the LPA’s strategic policies that are required under national policy to ensure that “*a sufficient amount and variety of land can come forward where it is needed*”.

- 1.8 In terms of the current Cheshire West development plan, it therefore undermines Local Plan Part 1 policy STRAT 2, which requires at least 22,000 new dwellings across the Borough over the period of 2010 to 2030. It also seeks to constrain any successor policy in the emerging Local Plan, which will need to meet the significantly greater requirement of the standard method figure.
- 1.9 To meet basic conditions (a) and (c), draft policy HN1 should therefore be revised to remove the proposed limit housing delivery in the neighbourhood plan area.

Policy HN2 – Housing Density

- 1.10 Draft policy HN2 states “*Any new housing must reflect the existing local context and should provide no more than 16 new houses on any one available and deliverable brownfield or greenfield of less than 1 hectare site immediately adjacent to the village with an average density of 16 dwellings per hectare (dph) to complement the existing villages housing density range of 6 to 26 dph. Schemes that exceed the average density of 16dph or the maximum land area of a hectare should be refused*”.
- 1.11 As noted above, the basic conditions to be met at examination for a neighbourhood plan to proceed to referendum include basic condition (a) to have regard to national policies and advice. As currently drafted policy HN2 is highly prescriptive with the inclusion of a maximum density of 16 dwellings per hectare
- 1.12 This fails to reflect National Planning Policy Framework (NPPF) paragraphs 129 and 130 as 16 dwellings per hectare is a very low density. Paragraph 129 states “*Planning policies and decisions should support development that makes efficient use of land*”. At the present time the local planning authority is unable to demonstrate a 5 year housing land supply and NPPF paragraph 130 makes clear “*Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances: (a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination . . .*”. Paragraph 130 continues: “*(c) local planning authorities should refuse applications which they consider fail to make efficient use of land*”.
- 1.13 Draft policy HN2 also proposes a 1-hectare ceiling to the size of new housing sites. This restrictive approach would also run counter to the national policy imperative to increase local housing supply. As NPPF paragraph 77 sets out “*The supply of large numbers of new homes can often be best achieved through planning for larger scale development*”. NPPF paragraph 77 goes on to say this may include “*significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities*”. Neighbourhood plans must support strategic policies and plan positively for

housing. There is no support in national planning policy to reject planning applications for housing sites above 1 hectare and we therefore strongly object to the proposed approach in draft policy HN2. It would undermine housing delivery in accordance with Local Plan Part 1 policy STRAT 2, which requires at least 22,000 new dwellings across the Borough over the period of 2010 to 2030.

- 1.14 Draft policy HN2 therefore does not meet basic condition (a) to have regard to national policies and advice contained in guidance issued by the Secretary of State. The proposed maximum density and site size for housing developments should both be deleted from policy HN2.

Policy HDC1 - General Housing Design Code

- 1.15 Draft policy HDC 1 states *“Development proposals for all new housing in the plan area must accord with the required scale of housing development”*. There is no definition of the required scale of housing development in the policy, nor any cross reference to other policies. As set out above however, draft policy HN1 and the accompanying text propose a maximum level of housing to be delivered in the neighbourhood plan area and draft policy HN2 a proposes site size for housing developments and are therefore assumed to represent the neighbourhood plan’s proposed position on the scale of housing development.
- 1.16 As set out in more detail above, this approach in draft policy HN1 and HN2 is in clear conflict with national planning policy and would fail to meet basic conditions (a) and (c) and we therefore strongly object to the proposed text *“Development proposals for all new housing in the plan area must accord with the required scale of housing development”* in draft policy HDC1.
- 1.17 The reference to the scale of development should therefore be deleted from policy HDC1.
- 1.18 Policy HDC1 also says *“Development proposals for all new housing in the plan area must accord with . . .the new Design Guidance published by GOV.UK January 2026”* This is understood to be a reference to the Design and Placemaking Planning Practice Guidance (PPG) which was consulted upon from 21 January 2026 to 10 March 2026. This is a consultation on a section of the PPG intended to support Chapter 14 of the proposed new NPPF (consulted upon from 16 December 2025 to 10 March 2026). At the point the new NPPF and updated PPG are put in place by the government they will stand on their own.

Policies HDC3 – HDC29

- 1.19 Policies HDC3 – HDC29 are a series of policies providing design guidance. Whilst we consider they cover appropriate issues for a neighbourhood plan, in a number of places the phrasing of these policies is excessively prescriptive.
- 1.20 For example, draft policy **HDC3 - Trees and Planting** states that *‘Mature trees and hedgerows must be retained’*. It is noted that Page 14 of the NDP explains *“Where policies are designated as a MUST, these are deemed to be essential and non-negotiable. Any proposals that do not meet these requirements will not be approved”*.

- 1.21 This approach lacks sufficient flexibility, for example trees or hedgerows on a site may be in poor condition or be an unsuitable non-native species. In such circumstances replacement may be preferable. In certain cases mitigation to off-set loss could also be acceptable. We note that the equivalent policy in Local Plan Part 2, Policy DM 45 refers to integrating 'significant' and 'healthy' trees and hedgerows and, where loss is justified, replacement planting at a ratio of at least two new trees for each tree lost.
- 1.22 Similarly, policy **HDC 9 The Street Network** says "*Cul-de-sacs must be avoided unless they include through routes (filtered permeability) for walking or cycling*". Whilst we agree permeability on foot and by bicycle is supported by good practice and guidance regarding design, there will not always be scope for through routes for walking or cycling, such as where a site backs onto existing development or a feature such as a railway line for example. The Neighbourhood Plan explains on page 14 that where the word '*should*' is used, this means "*whenever possible unless there are specific reasons for not doing so . . . evidence must be presented to justify why not*". We object to the use of the word 'must' in policy HDC9 and consider 'should' is more appropriate phrasing.
- 1.23 Another policy with excessively rigid phrasing is **Policy HDC28 - Passivhaus standards: Advanced Environmental Design**. This says that "*New buildings and retrofit development in Christleton and Littleton must achieve exceptional energy efficiency in line with Passivhaus Standards*". This approach would exceed Building Regulations requirements and, without undertaking a viability assessment to demonstrate that housing would be deliverable, is not appropriate. We note NPPF paragraph 135 provides a list of design-related considerations and states that planning policies and decisions 'should' ensure that developments deliver these. The consultation makes clear this means plans will not be expected to set higher standards for energy efficiency than those within building regulations. The equivalent policy in Local Plan Part 2 is less prescriptive in its wording and states "*Innovative sustainable design solutions for energy efficiency and low carbon energy generation and use over and above Building Regulations and/or National Housing Standards will be supported*". Furthermore, the government consulted on a new version of the up to 10 March 2026 and the draft text says plans will not be expected to set higher standards for energy efficiency than those within building regulations.
- 1.24 There are a number of other examples in draft policies HDC3 – HDC29 where the use of the word '*must*' creates an excessively inflexible approach. In accordance with basic condition ref. (e) we therefore consider the wording of policies HDC3 – HDC29 should be reviewed to allow for greater flexibility in design.

Policies GG1-GG5 - Green Gaps

- 1.25 NPPF paragraph 13 makes clear '*Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies*'. NPPF paragraphs 20 - 23 set out the Local Plan requirements for strategic policies. In respect of non-strategic policies, the NPPF makes clear '*Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies*'. (paragraph 30).

- 1.26 The function of draft policies GG1-5 is stated in the supporting text to be to '*prevent settlements from merging into one another*'. Policies GG1-GG5 propose an additional Neighbourhood Plan-level designation in locations that are Green Belt and therefore already protected by national policy and local plan policy in that regard. Neighbourhood plans must support strategic policies and avoid Local Plan policy duplication. Policies for the protection of the Green Belt are strategic policies and a matter for the LPA's own development plan review. As such, rather than an approach directing development that falls outside the scope of strategic policies as envisaged in NPPF paragraph 13, policies GG1-5 duplicate and potentially conflict with the strategic policies.
- 1.27 For a neighbourhood plan to proceed to referendum the basic conditions must be met. Condition (e) requires general conformity with the strategic policies contained in the development plan for the area. This involves consideration of: "*(i) whether the neighbourhood plan policy or development proposal supports and upholds the general principle that the strategic policy is concerned with; (ii) the degree, if any, of conflict between the draft neighbourhood plan policy or development proposal and the strategic policy; (iii) whether the draft neighbourhood plan policy or development proposal provides an additional level of detail and/or a distinct local approach to that set out in the strategic policy without undermining that policy; (iv) the rationale for the approach taken in the draft neighbourhood plan or Order and the evidence to justify that approach*' (PPG paragraph: reference 41-074). We submit that policies GG1-GG5 seek to duplicate the policies contained in the development plan for the area and potentially constrain or conflict with these.
- 1.28 In accordance with basic condition (e) policies GG1-GG5 should be deleted from the NP.

Policy GG1 - Land separating Christleton from Great Boughton and Huntington

- 1.29 Notwithstanding that we consider that the Green Gaps policy as a whole should be deleted, we object to GG1 specifically. In this regard our representations refer in particular to land at Manor Farm, Christleton, Chester, the part of proposed GG1 south of the A55 and west of the railway line. This area is identified in the Council's Land Availability Assessment as site ref. 1439 'Land at Manor Farm, Christleton'. A location plan is included at Appendix 1. Brampton Strategic Land have an interest in this land (hereafter referred to as 'the Manor Farm site') and representations on behalf of the landowner were submitted in response to the Cheshire West and Chester Local Plan Issues and Options consultation in August 2025.
- 1.30 The Manor Farm site has Christleton village to the northeast, the Chester-Crewe railway line to the east, the A55 and the existing residential areas of Huntington and Great Boughton to the west, and housing at Saighton Camp to the south. We consider the Manor Farm site to provide the opportunity for a significant new development, providing high-quality housing, employment land, community facilities, and potentially a local centre, set within an attractive landscape framework. We consider it offers an excellent opportunity that can readily deliver sustainable housing development and make a substantial contribution to meeting the District's local housing need. This area has therefore been promoted as a proposed mixed-use land allocation for the Local Plan.

- 1.31 In addition we note the Neighbourhood Plan includes a series of bullet points to accompany GG1. We have reproduced these below, with comments on each:

“• provides access to open countryside for all three Parishes”.

The Manor Farm land is agricultural land in private ownership. The only lawful access is the public footpath which runs from north east to south west across the Manor Farm site.

“• provides Public Rights of Way (PROW) access between the Parishes”

Where the Manor Farm land is brought forward for development, the public footpath could be retained in its current alignment and set within a landscaped corridor of open space.

“• Christleton and Littleton do not need the large number of proposed houses possible on GG1”. This statement should be deleted. The basic conditions for a neighbourhood plan as set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 include having regard to national policies and advice. Cheshire West and Chester Council is required under national planning policy to identify a sufficient supply of housing land to meet identified housing need. This process is a requirement at the local planning authority level and the objectively assessed local need figure to be met is currently 1,914 homes per annum (28,914 over the proposed 15-year plan period).

It is evident that only a limited part of local housing need can be met within the existing capacity of urban areas and greenfield sites are expected to be required. The Local Plan consultation document of July 2025 sets out that *“the sites on previously developed land without planning permission, including undeveloped Local Plan allocations, within the main urban areas and Key Service Centres, with a potential capacity of just over 5,000 homes. However, this figure is likely to reduce once a detailed assessment of the constraints, development potential and availability and achievability is carried out”*. (page 23, paragraph 2).

As such it is not appropriate to suggest there is an absence of “need” for homes on GG1 and it is evident greenfield sites located on the edge of existing settlements will necessarily form part of the Local Plan’s spatial strategy. As set out above, we consider the land at Manor Farm offers a suitable location for a high-quality development of significant scale.

“• GG1 checks the unrestricted sprawl of large built-up areas and preserves the setting and special character of Chester – proposed developments in GG1 are therefore not grey belt”.

The Local Plan settlement hierarchy set out identifies Chester as a “City” at the top of the hierarchy. It contains 24% of the population of the Borough as a whole and it is the main centre in the plan area. National policy (NPPF paragraph 110) says *“Significant development should be focused on locations which are or can be made sustainable”* and, as a result of Chester’s role in respect of employment, culture, retail, leisure, and education, it is the most sustainable location for a significant proportion of new development.

Land all around the edge of Chester is however in the Green Belt. Whether or not certain parts of this would be judged to meet the national policy definition of ‘Grey Belt’, NPPF paragraphs 145 and 146 make clear preparation of Local Plans should consider the need for any changes to Green Belt boundaries and the required ‘exceptional circumstances’ to remove land will exist

“where an authority cannot meet its identified need for homes”. The process required to justify changes to Green Belt boundaries is then set out in paragraphs 147 – 149.

“• the single point access points offered by any development on and off an already capacity limited A41 trunk road south in the midst the main cycling and walking route to the schools and complex vehicular movements on and off any developments, adjacent properties and adjacent roads and junctions is completely unacceptable. Peak A41 vehicular flows will coincide with stationary traffic north, fast moving traffic south and waves of children cycling and walking to and from the High School and Primary School. Any proposed developments will increase an already unacceptable serious injury risk to schoolchildren”.

Access and transport considerations of development on the Manor Farm site will be assessed in connection with emerging proposals here and the evidence then considered as part of determination of any planning application. It is however noted that there are various access options in respect of the Manor Farm site. The representations in response to the Cheshire West and Chester Local Plan Issues and Options consultation were accompanied by a transport report from a specialist consultancy. This proposed a primary vehicular access to the north, via a signal-controlled junction on the A41 at White Lane, Christleton, connecting to a widened bridge over the railway line, with a secondary vehicular access point to the B5130 at Chester Road, Huntington. The report noted the scope for an additional vehicular access point connecting to the A55 via the west-bound access slip road is subject to further investigation.

“• Christleton and Littleton Parish Councils have an Air Quality Working Group. Their latest report shows that CWaC fixed monitor measurements exceed the WHO limit for NO2 and the handheld plume measurements show that the NO2 and PM2.5 are many times the WHO limits at A41 peak times. Further traffic on the A41 will make it impossible to meet the earlier DEFRA targets just announced”.

The air quality impacts of development on the Manor Farm site will be assessed in connection with emerging proposals here and the evidence then considered as part of determination of any planning application.

“• the Battle of Rowton Heath was centred on an area bounded by the Shropshire Union Canal and Rowton Lane but the wider skirmishes occurred over this and a wider area” .

Heritage impacts would be assessed in connection with any emerging proposals and considered as part of the determination of any planning application.

1.32 In addition, it is noted that Page 48 of the Neighbourhood Plan contains a further series of bullet points headed ‘*Manor Farm site in GG1*’. It is assumed this text, which is not part of draft Policy GG1-5 Green Gaps, is supporting text which seeks to provide context as explanatory memorandum to be read together with the actual policy. It is also assumed that this explanatory text refers to the area identified in the Council’s Land Availability Assessment as site ref. 1439 ‘Land at Manor Farm, Christleton’ and shown on the location plan at Appendix 1 (i.e ‘the Manor Farm site’). Brampton Strategic Land have an interest in this land and therefore wish to make the following points.

1.33 The vision for the land at Manor Farm is a new sustainable neighbourhood comprising a range of housing, employment land, community facilities and a local centre, active travel routes

through extensive open space, play areas, tree planting, wildlife areas and a green buffer to the south / the wider countryside. The proposals for the Site are under development and will be subject to review as technical assessments are completed, with an evolving masterplan guiding delivery of a high-quality development.

- 1.34 Guidance issued by the Government – “Neighbourhood Planning” contains the following text under the heading, “*How should the policies in a neighbourhood plan be drafted*”:- “*A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise **and supported by appropriate evidence**. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.*” (Paragraph: 041 Reference ID: 41-041-20140306 Revision date: 06 03 2014) (our emphasis).
- 1.35 Matters are referred to in the list of points on page 48 that relate to the proposals at Manor Farm (ie land within GG1) and comprise location of schools, road safety/capacity and heritage impacts. These matters would be assessed in connection with emerging proposals on the Manor Farm site and the evidence then considered as part of determination of any planning application. It is not appropriate to seek to legislate against specific development proposals in explanatory text with a series of unsubstantiated statements in circumstances where explanatory text of this nature should inform and support the actual policy which is proposed by reference to appropriate evidence. Furthermore a number of bullet points (i.e. 1 – where reference is made to the term “*planning inducement*” and 6 – where reference is made to “*legal advice*”, “*planning and inducement*” and “*breaches of planning law*”) contain emotive language and unsubstantiated facts which those with an interest in the site in question (ie the Manor Farm site in GG1) have had no opportunity to formally address and comment upon including with regard to the inclusion of such text in the neighbourhood plan. We therefore request this section is deleted from the neighbourhood plan.
- 1.36 The basic conditions for a neighbourhood plan as set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 require general conformity with the strategic policies contained in the development plan for the area and the potential for development in this area will be considered via the development plan process. We therefore object to GG1 and request that it is deleted.

Policy CF4 - Community facilities not permitted

- 1.37 This proposed policy fails to plan positively for new development and is highly prescriptive. NPPF paragraph 30 requires “*Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies*”. Draft policy CF4 however seeks to prohibit forms of development/local facilities, without any justification based on evidence.
- 1.38 Matters such as noise or traffic impacts arising from development are addressed in other planning policies. They would be assessed in connection with emerging proposals and

evidence of impacts arising then considered as part of determination of any planning application.

- 1.39 Policy CF4 should therefore be deleted from the NDP.

CONCLUSION

- 1.40 We therefore respectfully request that the Neighbourhood Plan and its draft policies are amended as set out above.
- 1.41 Brampton Strategic Land and the landowners (R and C Handley) would like to take an active part in the Neighbourhood Plan preparation and to be kept informed of further stages. Should the Council wish to discuss these representations or require further information, please feel free to contact Knights and we would be pleased to assist.

Knights plc

June 2026

**Appendix 1 – Site location
plan, land at Manor Farm,
Christleton**

Key

Site Boundary

