

Cheshire West and Chester Council
The Portal
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To Whom It May Concern

Christleton and Littleton Neighbourhood Plan: Regulation 16 Pre-Submission Consultation – Representations on behalf of Bloor Homes

This representation has been prepared by Lichfields on behalf of Bloor Homes (North West) [Bloor] in relation to the consultation on the Christleton and Littleton Neighbourhood Plan Regulation 16 Pre-Submission Consultation Draft Plan [CLNP].

The representation is made in the context of Bloor's land interest at Whitchurch Road, Chester [the site], which is the subject of an outline planning application for the development of up to 200 dwellings (LPA ref. 25/02656/OUT). Although the application site is adjacent to the Chester urban area, it falls within the Christleton and Littleton Neighbourhood Area.

Bloor welcomes the opportunity to engage with Christleton and Littleton Parish Councils [the Parish Councils] through the Neighbourhood Planning process, and whilst a number of the concerns raised in the response to the Regulation 14 consultation have been addressed in the Regulation 16 plan, a large number of concerns still exist with the content of parts of the document, which are set out in this representation.

Background Context

The Christleton and Littleton Neighbourhood Plan area was designated by Cheshire West and Chester Council [the Council] following a consultation period that ran from the 14th of December 2023 to the 1st of February 2024. The application, submitted under Regulation 5 of Neighbourhood Plan Regulations 2012, encompassed the areas covered by Christleton and Littleton Parish, aligning with the respective parish boundaries.

Following the area designation, the Parish Councils prepared a Parish Priority Statement outlining the needs and priorities for the neighbourhood plan area which was published in July 2025.

The Parish Councils subsequently consulted on the Regulation 14 Neighbourhood Plan under from 10th November to 22nd December 2025. Bloor submitted representations to this consultation, highlighting a

number of concerns with the CLNP relating to policies proposed, the overly restrictive Design Code requirements, the pursued housing requirement, and the timing of the CLNP.

This consultation is undertaken under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012, following which it is expected that the CLNP will be submitted for independent examination. Whilst it is appreciated that there is no opportunity for amendments to be made prior to examination, should the Neighbourhood Plan proceed to referendum post examination, an opportunity exists for the necessary amendments to be made to the CLNP. This would ensure that any Neighbourhood Plan that does go to referendum appropriately meets the needs of the local community and facilitates an appropriate quantum of development in a manner that is cognisant of the parishes' location and character.

Timing and Context of the Neighbourhood Plan

It must be reiterated that Cheshire West does not have an up-to-date development plan and is some time off from having a new Local Plan. Based on recent discussions with the Council, it is envisaged that the Council will prepare a Local Plan in line with the new style Local Plan system and adoption is not envisaged until 2029. The Neighbourhood Plan being prepared needs to have regard to the likely content of the emerging Local Plan, to national policy in particular the need to significantly boost the supply of housing land.

Changes to national planning policy have seen a significant increase in the local housing need for Cheshire West and Chester, which has increased from 534 to 1,929 dwellings per annum [dpa] (as of May 2026). Although the Council now envisaged preparing a new style Local Plan, it did consult upon a Reg. 18 Local Plan in 2025. Based on the spatial strategy set out in the Council's Reg. 18 Local Plan to accommodate the level of housing requirement in Cheshire West, it is inevitable that some development will be located on the edge of Chester in the Christleton and Littleton Neighbourhood Plan Area.

Progression of the Neighbourhood Plan should be paused until at least a time when there is a clear direction in terms of the future spatial strategy and development distribution aspirations of the new Local Plan are known. The Planning Practice Guidance [PPG] addresses this point and sets out that proactive engagement between the neighbourhood plan making body and the local authority is important to avoid disagreement and *minimise the risk of neighbourhood plan figures being superseded when new strategic policies are adopted*¹.

Planning Policy and Guidance

The most recent iteration of the National Planning Policy Framework [NPPF] was published in December 2024, with minor updates made in February 2025, and sets out at Paragraph 29 that:

“Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies”.

¹ PPG: Paragraph: 102, Reference ID: 41-102-20190509

The PPG² states that only a draft Neighbourhood Plan or Order that meets each of a set of basic conditions can be put to a referendum and be made. The basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. The relevant basic conditions are:

- 1 having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).
- 2 the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.
- 3 the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
- 4 the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.
- 5 prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).

The Need for New Homes

This response is made in the context of the national directive to increase housebuilding and the supply of housing land. A primary focus of the current Government is to stimulate the development of new homes up to a target figure of 1.5 million during the current Parliament, equivalent to 300,000 dwelling per annum. Updates were made to the NPPF in December 2024 as part of this national directive and to facilitate the necessary increase in housebuilding on a national scale.

Specifically, Paragraph 61 states that *“to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed... The overall aim should be to meet an area’s identified housing need, including with an appropriate mix of housing types for the local community”*.

As stated at Paragraph 62, in order to stimulate the supply of homes, strategic policies should be informed by a local housing need assessment that is conducted using the standard method. To this regard, the revisions to the standard method introduced in December 2024 alongside the NPPF resulted in a significant increase in local housing need [LHN] in the borough, which saw an increase of 262% to 1,929 dpa from the 532 dpa under the previous standard method, and is substantially greater than the Council’s adopted 1,100 dpa requirement.

As a result of the borough’s increase in LHN, the Council’s current housing land supply position demonstrates the issues on a local scale. The Council’s most recently published deliverable supply position is set out in its 2025 Housing Monitoring Update, which noted that at 1st April 2025, the Council has a total deliverable supply of 3,788 dwellings – equivalent to an immediate undersupply of 6,334 dwellings and five-year housing land supply position of just 1.89 years.

Notably, the Council’s supply at 1st April 2025 saw a 421 dwelling decrease in the deliverable supply since 1st April 2024, highlighting the worsening situation in the Borough and the need for additional

² PPG: Paragraph: 010, Reference ID: 41-065-20140306

housing land is to bolster the supply, and ultimately reduce this deficit. It should be noted that since the publication of this position, the increase in the Council's LHN has worsened this position to 1.87 years, with an immediate deficit of 6,339 homes.

It is therefore imperative that a Neighbourhood Plan is cognisant of both the national and Borough-wide situation, with regard to planning policy at both levels and the need for the Plan to contribute to the achievement of sustainable development within the area.

Overarching Issues

There are a number of overarching flaws and concerns with the Neighbourhood Plan in its current form that need to be addressed, both in terms of the current context of plan making in the Borough and more specifically in the contents included within the CLNP.

From the outset, it is clear that the prerogative of the emerging Neighbourhood Plan is seeking to restrict new development in the area, rather than proactively and positively planning for future growth. This is in direct conflict with the basic condition to contribute to the achievement of sustainable development. The Vision and Objectives of the Plan should seek to positively influence the growth of the settlement rather than plan for its contraction.

Furthermore, one of the objectives of the plan is to encourage young people to remain in the village including through the delivery of affordable 2 and 3 bedroom homes. It is unclear how the Neighbourhood Plan is proactively seeking to achieve this objective, given the restrictions placed on new development and lack of developable allocations identified within the Plan. The allocation of sites for residential development, sufficient in size to deliver the affordable housing needed in the Parishes is one of the easiest ways of delivering affordable homes for young people, which is evidently not appreciated by the Parish Councils.

Christleton and Littleton are affluent neighbourhoods and this significantly restricts the ability of young people and families from getting on the housing ladder, particularly where no affordable housing is being delivered. Despite their affluence, the Neighbourhood Plan does not acknowledge or set out anywhere the issues associated with the affordability of homes.

It should additionally be noted that the plan period is currently unclear. On the front page, the CLNP notes that it will take full effect from 2026 to 2042, however in the Glossary the Plan Period is defined as *'The period for which the Neighbourhood Plan will set policy for the NPA. This will be from the adoption of the plan from 2026 until 2030 by agreement between Combined Parishes and Cheshire West and Chester Council'*. This raises fundamental concerns, given it is not clear the timeframes for which the CLNP seeks to plan for, and speaks to the significance of issues within the Neighbourhood Plan.

Timing and Context of the draft Neighbourhood Plan

The Neighbourhood Plan seeks to cover the period for 2026 to 2030 or 2042, issues surrounding which are noted previously, either aligning with the remainder of the period for the adopted Cheshire West & Chester Local Plan or extending into the next Local Plan period. That being said, there is no acknowledgement within the CNLP that the Local Plan is out of date, which was confirmed the Director of Economy and Housing at the Council in a report to Cabinet for published on 15th January 2025. This

report set out that as a result of the increased LHN, the Council's adopted housing requirement would no longer be considered to be appropriate and requires updating.

The Council has subsequently committed to preparing a new Local Plan, and undertook initial consultation on the Issues and Options (Regulation 18) for its new Local Plan from 4th July – 29th August 2025. The Issues and Options consultation document presented three spatial options to form the basis of the emerging Local Plan, namely:

- **Option A:** Retain Green Belt, avoiding the direction of new development to the Green Belt in the north of the Borough.
- **Option B:** Follow current Local Plan distribution by applying the same proportion of housing in the same areas as delivered under the last Local Plan.
- **Option C:** Focus on sustainable transport corridors, building houses where there are good existing transport links.

It should be noted that land within the Christleton and Littleton Parishes was identified as a potential growth option for Chester under both Option B and Option C of the consultation document.

It is understood that the Council is yet to determine the spatial option that will be pursued in the emerging Local Plan. The Council has now committed to preparing a new Local Plan under The Town and Country Planning (Local Planning) (England) Regulations 2026, and as such further initial consultation is expected, however it is still considered the options presented in the Regulation 18 Consultation speak to the Council's direction for the next Plan Period.

In this context, the role of Neighbourhood Plans is pertinent, specified as to support the delivery of strategic policies at NPPF Paragraph 133. The PPG confirms that where a Neighbourhood Plan is brought forward before an up-to-date local plan is in place, the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in, the emerging neighbourhood plan and the emerging local plan, with appropriate regard to national policy and guidance³.

It is currently unclear whether any discussions have been undertaken between the Council and the Parish Councils to ensure that the Neighbourhood Plan is consistent with a future Local Plan for Cheshire West. As such, until the appropriate spatial strategy is selected by the Council, work should be paused on the Neighbourhood Plan. If work continues, it could be completely abortive and result in the Neighbourhood Plan being out of date very shortly after it is made.

Assessment of the Draft Neighbourhood Plan

This section of the presentation provides an analysis of the proposed Neighbourhood Plan policies, and recommend amendments where appropriate to ensure the basic conditions are met.

³ PPG: Paragraph: 009, Reference ID: 41-009-20190509

Policy HN1: Housing Need

Policy HN1 (Housing Need) states that *‘the housing needs survey identified a need for 12 houses plus 3 applicants on the housing register who have a local connection with Christleton and Littleton.’*

It is unclear from the Policy wording whether the Parish Councils are seeking to establish a minimum or maximum quantum of development within this policy, however the approach to calculating its housing need is flawed and wholly inconsistent with the approach they should be taking in accordance with the NPPF.

The Housing Needs Survey noted in this policy was undertaken by Cheshire Community Action on behalf of the Parish Councils, with a survey distributed to local residents, and review of demand from the affordable housing register. This is a very limited way of determining housing need and wholly flawed. The Housing Needs Survey looks forward for the five year period from March 2024 (to March 2029), which does not align with the pursued CLNP period to 2030 or 2042.

NPPF Paragraph 69 confirms that *‘Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period.... Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.’*

Paragraph 70 subsequently notes that *‘Where it is not possible to provide a requirement figure for a neighbourhood area, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body’.*

The approach taken by the Council to calculate its own needs rather than request a figure from the Local Planning Authority is inconsistent with the above and fundamentally flawed in the context of national planning policy. Procedurally, the Parish Councils should have approached the Council and requested a housing need figure to plan for, rather than taking the restrictive approach and artificially decreasing need in the Neighbourhood Plan area. This is in direct conflict with the basic condition requirement for national policy compliance.

Furthermore, the Parish Councils are claiming a total need of 15 dwellings, on the basis that 12 responses to the survey indicated a need for affordable housing, and that just three applicants on the housing register were noted to currently live in the area, as detailed within the Housing Needs Survey Report. This sits well below the 77 households registered for affordable rent in Christleton alone, and holds no regard for those that are currently unable to reside in the area due to an insufficient supply of affordable housing. Given that the Parish Councils’ own evidence⁴ indicated that median house prices in the Christleton and Huntingdon sit at 48.8% greater than the median for the Borough, it is considered inappropriate for the Parish Councils to take a restrictive view on the affordable need for the area.

⁴ Christleton and Littleton Housing Needs Report (Cheshire Community Action, June 2024) – utilising ONS Data for year ending December 2022

There is similarly no consideration for the need for market housing in the Parishes, in spite of the 37 respondents that identified that they would like to purchase a market home in the area over the next five years. The CLNP should plan to meet both the affordable and market needs for the area.

Furthermore, the Housing Needs Survey returned just a 24% response rate, therefore this need is not a representative outcome for the entire Neighbourhood Plan area. Should the responses be taken as a sample, this should be proportioned to reflect the entire population of the area, rather than just the 24% currently represented.

It is also considered that the Parish Council's approach to housing need is inappropriate in the context of the Government's ambitions to stimulate house building on a national level. The Housing Need Report on which this draft policy is based was published in June 2024 prior to the publication of the December 2024 NPPF and makes no acknowledgement of the need for new homes in sustainable locations nor the stock based approach that is now considered to be the foundation for calculating LHN.

As such, Bloor considers that the Housing Need Survey is not representative of the actual housing need in the area and the aspirations of national policy on positively addressing the current housing crisis. Therefore, it should not be relied on to justify the contents of Policy HN1.

Policy HN1 should therefore be removed from the CLNP prior to proceeding to referendum, to ensure compliance with national policy and meet this basic condition.

Policy HN2: Housing Density

Policy HN2 (Housing Density) requires new housing development to reflect the existing local context and notes a maximum of 16 new homes for sites of less than one hectare, with an average density of 16 dwellings per hectare [dph]. The policy states that schemes that exceed the average density of 16dph or the maximum land area of a hectare should be refused.

The first fundamental issue associated with Policy HN2 is the maximum density of 16dph it seeks to establish. At the core of the NPPF is the requirement to make an effective use of land (Chapter 11), with opportunities to achieve appropriate densities central to this requirement. Paragraph 129 in particular notes that '*Planning policies and decisions should support development that makes efficient use of land*', part of which includes the desirability of maintaining an area's prevailing character and setting. The CLNP confirms that densities in the area range from 6dph to 26dph, therefore it is unclear why 16dph has been selected as a maximum figure given densities above this maximum would remain in keeping with the prevailing character of the area.

Furthermore, Paragraph 130 confirms that '*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*'. Given the significant deficiency in the Council's housing supply, which sits at just 1.89 years⁵, it is clear that the provisions of Paragraph 130 are appropriate, and the Parish Councils should avoid low density development.

⁵ Cheshire West and Chester Housing Land Monitor Summary Report 2025

It is therefore considered that this Policy fails to meet the basic condition relating to the requirement for the Neighbourhood Plan to have regard to national policies and advice contained in guidance issued by the Secretary of State.

The second fundamental issue associated with Policy HN2 is the arbitrary restriction of new development to a maximum of 16 dwellings in any one scheme through the employment of a maximum site size, with no evidence as to why schemes that achieve a dwelling yield in excess of this should be restricted. The artificial cap on the number of units being delivered will not contribute towards sustainable development in the Parishes, nor will this aid in meeting the actual needs existing in the Parishes and across the Borough rather than the artificial need stated by the Parish Councils.

There is a clear emphasis from the Government to facilitate the development of new homes, which is evident in changes made to the NPPF, and the Written Ministerial Statement '*Building the homes we need*⁶ made on 12th December 2024 further highlights the need to facilitate additional residential development. The Government itself considers the situation that has arisen to be an '*acute and entrenched housing crisis*' which cannot be solved through the restriction of development to below unjustified thresholds.

Paragraph 30 of the NPPF specifically notes that neighbourhood plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies. At this time, when it is currently unclear whether the emerging strategic policies will be seeking to direct development to Christleton and Littleton, the restriction of development to the level proposed under Policy HN2 threatens to undermine the emerging Local Plan and the Council's efforts to meet its housing need in a plan-led manner, directly in conflict with national planning policy.

Policy HN2 must therefore seek to facilitate rather than unjustifiably restrict the delivery of the much needed homes in the Borough. Given the Parishes' highly sustainable location, directly adjacent to the largest and most sustainable settlement in the Borough, the Parish Councils should not be seeking to bring forward a plan with the primary intention of restricting new development. Bloor considers that the cap on density and site size, which in combination arbitrarily restrict development quantum's, must be removed and greater flexibility included within the policy to accommodate the development that is genuinely required in Christleton and Littleton.

This policy should therefore be amended to remove the artificial density and site size caps prior to the Neighbourhood Plan proceeding to referendum.

Policy HN3: Brownfield or Greenfield Development

Policy HN3 (Brownfield or Greenfield Development) notes that new development should not be co-located with other new housing developments unless there are demonstrable sustainable benefits from doing so. The policy also confirms that all new development must achieve efficient use of land having regard to the prevailing character of the area, and must be the result of a robust design-led approach having regard to the policies contained within this plan and the requirements contained within the Design Code.

⁶ Building the homes we need - Statement made on 12th December 2024 – Matthew Pennycook, Minister of state for Housing and Planning (Statement UIN HCWS308)

It is interpreted that the restriction on new housing developments coming forward on adjacent sites seeks to prevent larger sites being divided and coming forward in smaller phases. To this regard, similar concerns exist to those surrounding Policy HN2. The wording of this policy again seeks to artificially cap new developments to a maximum of 16 dwellings, unless sustainability benefits of adjacent sites coming forward are demonstrated sufficient to overcome this restriction.

In the context of housing need both at a local and national level, this restriction on residential development is inappropriate, and does not meet the basic conditions relating to national and local policy conformity, and contribution to sustainable development. This policy should therefore be reworded to remove this reference prior to proceeding to referendum.

Housing Design Code

The CLNP provides a prescriptive Design Code for new development within the Neighbourhood Plan area. It is significant to note that the Design Code cannot introduce additional policy requirements which are in conflict with policies within the adopted Development Plan and should not introduce overly prescriptive design requirements.

Furthermore, given that the Council is currently preparing a borough wide Design Code which is expected to be released imminently, concern exists that the proposed CLNP Design Code could give rise to conflict with the Council's emerging code. Specific Design Code Policies are discussed in turn, as relevant.

Policy HDC1: General Housing Design Code

Policy HDC1 (General Housing Design Code) seeks to establish that new housing developments in the plan area must accord with the required scale of housing development and both the Christleton and Littleton Design Code and the new Design Guidance published by GOV.UK January 2026 'to raise the bar for new build development'.

It is inferred that the Design Guidance published by GOV.UK is the Design and Placemaking Planning Practice Guidance, which was consulted on from 21st January to 10th March 2026. To this regard, it is not appropriate for the CLNP to refer to national guidance that is the subject of consultation and has not been formally published. To ensure this policy meets the basic conditions relating to national policy/guidance, the policy should be reworded to more generally refer to the Planning Practice Guidance.

Furthermore, the policy wording referring 'required scale of development' is clearly ambiguous and does not directly relate to any identified needs. Should the policy be referring to the need identified at Policy HN1, this would be inappropriate for the reasons discussed previously. The policy should therefore be updated to remove this reference prior to the CLNP proceeding to referendum.

Policy HDC3: Trees and Planting

Policy HDC3 (Trees and Planting) seeks to establish a requirement whereby mature trees, hedgerows and ponds must be retained, and the provision of one semi-mature tree to be planted for each new dwelling constructed. Prescriptive species lists for new hedgerows and trees and similarly provided.

Whilst Bloor supports efforts to retain hedgerow, trees and ponds, appreciation must be held for necessary removal of such features to deliver new development. Local Plan Part 2 Policy DM45 (Trees, woodland and hedgerows) makes allowances for where integration is not possible, and requires replacement planting for trees at a two to one ratio for each tree lost. Similar provisions are essential in the Neighbourhood Plan to ensure that such a policy does not preclude new development.

Furthermore, the prescriptive list of accepted species is unnecessarily rigid, and more flexible recommendations of species would be more appropriate particularly when factoring in other considerations such as BNG.

This policy should therefore be amended to more accurately reflect local planning policy and remove onerous and inflexible requirements prior to the Neighbourhood Plan proceeding to referendum.

Policy HDC4: Biodiversity

Policy HDC4 (Biodiversity) seeks to introduce a requirement for 50% of new dwellings to include either a bird/bat box, tiles or bee bricks.

Whilst the emphasis on integrating new developments with such species is supported, the requirement that this must be included in development is inflexible and does not allow for consideration of site-specific characteristics and viability impacts, therefore flexibility should be provided in applying such standards.

Embedding flexibility within the policy wording would ensure that this policy does not place an undue burden on the developers of new homes, therefore this policy should be amended as such.

Policy HDC12: Garage location and size

Policy HDC12 (Garage location and size) seeks to enforce internal minimum space standards for new garages of 3.5m by 7.0m (single) or 6.0m by 7.0m (double).

Whilst the Councils' justification notes increasing vehicles sizes, garage dimensions are already prescribed at a Borough wide level within the Parking Standards Supplementary Planning Document [SPD], most recently updated February 2022. Local Plan Part 1 Policy STRAT 10 (Transport and Accessibility) provides the policy basis by which the Council's Parking Standards SPD is enforced.

The SPD recommends internal dimensions for a single garage of 3.3m by 6m, and notes the standard dimension for a single garage is 3 x 6m and for a double garage is 5 x 6m, well below the requirements pursued by the CLNP.

Given that such requirements are already established at a Borough level, it is not appropriate for increased requirements to be pursued within the Neighbourhood Plan, therefore this Policy should be updated to refer back to the Council's Parking Standards SPD, ensuring that the basic condition requiring Local Plan conformity is met.

Policy HDC16: Minimum Space Standards

Policy HDC16 (Minimum Space Standards) seeks to enforce internal minimum space standards that align with the Housing Design Standards London Plan Guidance, at a level in excess of the Nationally Described Space Standard [NDSS].

Bloor supports the Parish Councils' intention for new development to provide dwellings with sufficient internal space, however this is the purpose of the NDSS on a national scale, and there is no justification provided for the use of London Plan guidance in this instance. The requirement goes beyond adopted development plan policy that requires new development to meet the applicable nationally described standards (Local Plan Part 1 Policy ENV6: High quality design and sustainable construction), and therefore there has been no consideration for the viability impacts of pursuing this standard at this time.

This policy in its current form would not meet the basic condition relating to local planning policy conformity given its introduction of additional and excessive requirements, and as such this policy must be updated to reflect NDSS requirements as per the adopted Development Plan.

Policy HDC19: Roofs

Policy HC19 (Roofs) introduces slope and material requirements for roofs in the Neighbourhood Plan area; in particular, the policy notes that roof heights must vary subtly, pitches be between 40 and 45 degrees, and be made of either natural Welsh, Lakes slate or traditional clay ridge tiles. No concrete tiles are permitted in Christleton under the policy.

Whilst it is appreciated that such requirements seek to ensure the new development is of a high quality, the material and design requirements go beyond the level of detail set out in adopted planning policy. There has therefore been no consideration of testing of viability implications that arising from such requirements.

As such, and to ensure conformity with emerging Borough-wide design guidance, flexibility should be detailed within the policy wording.

Policy HDC21: Windows, doors and porches

Policy HDC21 (Windows, doors and porches) establishes a requirement for windows to be timber sash or casement with glazing bars, and for stone or brick surrounds to be utilised to reinforce character.

Again, it is appreciated that whilst such requirements seek to achieve high quality development, these requirements go well beyond the level of detail included in the Development Plan, and there has been no testing of viability implications that arising from such requirements. The inflexible approach to these requirements risks precluding development, and is overly prescriptive.

This policy should therefore be amended to include greater flexibility, ensuring conformity with local planning policy and removing the potential for conflict with emerging Borough-wide design guidance.

Policy HDC28: Passivhaus standards: advanced environmental design

Policy HDC28 (Passivhaus standards: advanced environmental design) seeks to introduce a requirement for new buildings to achieve exceptional energy efficiency in line with Passivhaus Standards, setting specific targets that relate to u-values, airtightness, glazing specifications, and insulation.

Bloor is supportive of the Parish Councils' efforts to ensure that new development achieves high levels of energy efficiency, however such requirements must not place an onerous burden on developers. To this regard, there is no consideration as to the viability impacts on new development that would arise from this excessive standard being applied, which goes beyond the adopted policy requirements for the Borough and the Building Regulations requirements.

Additionally, such requirements are already established under Local Plan Part 1 Policy ENV 6 (High quality design and sustainable construction), which notes new development should incorporate energy efficiency measures and meet applicable nationally described standards for design and construction, and Local Plan Part 2 Policy DM 4 (Sustainable construction), which confirms that sustainable design solutions for energy efficiency and low carbon energy use over Building Regulations and/or National Housing Standards will be supported.

Policy HDC28 should therefore be revised to allow for flexibility in energy standards and specifications and should refer back to the appropriate Building Regulations standards, both to ensure such specifications do not preclude new development and to ensure that policy remains consistent with national regulations.

Policy HDG31: Solar photovoltaics (PV)

Policy HDG31 (Solar photovoltaics) seeks to introduce a mandatory requirement for solar panels or tiles on new buildings, which sit flush with the roof plane.

Whilst Bloor supports onsite energy generation, particularly through the inclusion of solar photovoltaic [PV] panels, the mandatory requirement places an onerous burden on developers. PV panels are not a mandatory requirement in the Building Regulations at this time, therefore should not be introduced in Neighbourhood Planning Policy.

Additionally, support for onsite energy generation is provided by Local Plan Part 1 Policy ENV 6 (High quality design and sustainable construction), which notes new development should provide for renewable energy generation without being overly prescriptive. This is supported by Local Plan Part 2 Policy DM 4 (Sustainable construction), which provides support for low carbon energy generation.

As such, this Policy should be amended to confirm that PV panels could be utilised, rather than the mandatory requirement, and refer back to the appropriate Building Regulations, ensuring conformity with both local policy and national directives to meet the basic conditions. This would similarly ensure that the CLNP policy remains consistent with national regulations.

Policies GG1-5 - Green Gaps

The CLNP seeks to introduce a number of green gaps within the Neighbourhood Plan area, and notes that the Green Gaps must not be developed unless very special circumstances can be demonstrated or

where development supports its role and function. The Green Gaps are noted to prevent housing developments, reinforce the protection provided by the Green Belt, prevent settlements from merging into one another, and provide access to open countryside.

The CLNP notes that failure to retain the green gaps will erode the physical gap required to maintain the integrity of each settlement, adversely affect the visual character of the landscape, significantly affect the undeveloped character of the green gaps, and lead to coalescence of the settlements.

Policy GG1: Land separating Christleton from Great Boughton and Huntington

A significant portion of land to the south of the A41 Whitchurch Road is identified as a Green Gap under Policy GG1 (Land separating Christleton from Great Boughton and Huntington). The extent to which this green gap achieves the purpose of such policy as identified above is questionable, however. The land proposed to be included as a Green Gap is already identified as Green Belt and the addition of another policy designation is unnecessary and achieves very little.

Significant coalescence has already occurred to the north of this Green Gap, and built form is present between the A55 North Wales Expressway and A55 Spur in the form of a number of residential dwellings, the Mercure Hotel, and recently constructed older people's accommodation. A significant portion of land to the south-east of the A41 has also been developed and therefore does not demonstrate the characteristics of a Green Gap.

Whilst it is appreciated that land to the east and south of the A55 North Wales Expressway does retain some features that the Parish Councils consider to be representative of a Green Gap, it is not considered that Bloor's land interest at Whitchurch Road functions in this manner.

Within this policy and the supporting text surrounding it, Bloor's Whitchurch Road site is identified as the land behind the Mercure Hotel. The CLNP notes that the proposed development is not required, and that the road infrastructure does not support a development of this site with access taken from Whitchurch Road.

To this regard, there is no consideration of the actual need for additional development land to come forward within the Borough to accommodate its LHN. Owing to the site's identification as a potential growth option for Chester in the Regulation 18 Issues and Options Local Plan consultation, it is evident that the Council do not agree with the Parish Councils' assessment of the site.

Furthermore, the Transport Assessment submitted as part of the application confirms that the access from Whitchurch Road is suitable for a development of this quantum, and the nature of the local highway network can accommodate a development of the scale proposed.

The submitted Air Quality Assessment additionally confirms that there are no issues relating to pollutants on the A41 that would be significantly worsened by the proposed development. The Air Quality Report cited dates from 2020 and relies on outdated baseline conditions, therefore does not appreciate improvements local air quality since its preparation, and includes incorrect references to air quality limits and standards. The report additionally relies on handheld PM2.5 monitors, which have no technical weight in decision-making, and the analysis within compares instantaneous spot readings with annual mean objectives, which is a flawed and which is potentially misleading approach. As such, the comments made relating to air quality are inappropriate and unfounded.

Policy GG1 must therefore be revised to remove land the land to the rear of the Mercure Hotel, bounded by the A41 Whitchurch Road, A55 North Wales Expressway, and A55 North Wales Expressway Spur, as the designation of this area as a Green Gap does not conform with local planning policy, national planning policy directives relating to 'grey belt' and the need for new homes, and contribution to sustainable development.

Policy INF1: Sewerage and Drainage

Policy INF1 (Sewerage and Drainage) notes that proposals for new development must be refused, and must not be occupied, until Welsh Water have provided additional wastewater treatment capacity.

In relation to wastewater treatment capacity, sewerage undertakers have a statutory duty under Section 94(1) of the Water Industry Act 1991 to ensure effective drainage and sewerage systems. This duty includes:

- a to provide, improve and extend such a system of public sewers (whether inside its area or elsewhere) and so to cleanse and maintain those sewers and any lateral drains which belong to or vest in the undertaker as to ensure that that area is and continues to be effectually drained; and*
- b to make provision for the emptying of those sewers and such further provision (whether inside its area or elsewhere) as is necessary from time to time for effectually dealing, by means of sewage disposal works or otherwise, with the contents of those sewers.'*

This duty is confirmed to be enforceable by the Secretary of State, or with the consent of or in accordance with a general authorisation given by the Secretary of State.

Furthermore, Section 106 of the Water Industry Act 1991 confirms that landowners have a right under to connect and discharge foul water into public sewers, and that an undertaker may only refuse a connection where that the mode of construction or condition of the drain or sewer:

- a 'does not satisfy the standards reasonably required by the undertaker; or*
- b is such that the making of the communication would be prejudicial to the undertaker's sewerage system'*

No scope of refusal for connection is made on the basis of capacity.

In light of the above, it is wholly inappropriate for the Parish Councils to seek to preclude new development due to sewage capacity. Furthermore, relevant conditions can be attached to any permission for development relating to foul water treatment capacity, hereby rendering this policy redundant from a planning perspective.

This policy should therefore be amended to refer to the need for conditions to delay development until enhancements to the sewerage network have been made by the sewerage undertaker, rather than for outright refusal, given the rights established in the Water Industry Act 1991.

Land at Whitchurch Road

As previously noted, Bloor has an interest in land at Whitchurch Road, Chester, and this representation has been made in the context of this land interest. The site is located on the eastern edge of Great

Boughton, approximately 2.5km east of Chester City Centre, and comprises c.10 hectares of greenfield land currently which is currently in agricultural use.

An outline application for the development of up to 200 dwellings at the site, alongside areas of public open space, was submitted to the Council in August 2025 and is currently pending determination (LPA ref. 25/02656/OUT). Discussions have been undertaken with Christleton Parish Council relating to this proposed development, to which it was highlighted in previous representations that the site offered an ideal opportunity to allocate land to meet its needs.

The Parish Councils have not chosen to allocate this site, in spite of its sustainable location and qualification as grey belt under the NPPF definition, but instead to seek to restrict its development and that of other sites in the area.

Summary and Conclusion

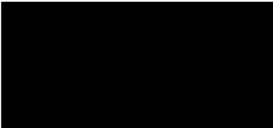
Bloor supports the efforts of the Parish Councils in preparing a Neighbourhood Plan for the Christleton and Littleton Parishes, however the Neighbourhood Plan should seek to facilitate the new development needed in the area.

The timing of the CLNP is inappropriate given the limited progress made by Cheshire West and Chester Council in relation to the new Local Plan, and conformity with the new Local Plan is not yet clear, therefore the CLNP should not proceed to referendum until the spatial strategy for the Borough has been selected as a minimum.

Notwithstanding the timing issues relating to the Local Plan, should progress with the CLNP continue, the amendments set out in this representation should be made as a minimum prior to referendum to ensure basic conditions are met.

We trust that these representations will be fully considered and its content are clear; if you have any questions on the content of this letter, please do not hesitate to contact me.

Yours faithfully

A black rectangular box used to redact the signature of John Hellon.

John Hellon
Planner
BA (Hons) MCD



Annex 1: Illustrative Masterplan

06	Update to masterplan	AB	20.11.25
05	Update to masterplan	AB	20.08.25
04	Update to masterplan	AB	25.07.25
03	Update to Redline	AB	16.06.25
02	Update to masterplan	AB	13.06.25
01	Update to masterplan	AB	29.05.25

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- 1

Primary access connecting to A41 Whitchurch Road
- 2

Arrival green around setting of existing trees
- 3

Central parkland
- 4

Woodland buffer
- 5

Existing woodland group
- 6

Village green with children's play
- 7

Green Corridor
- 8

Abbots Well pond
- 9

Wetland area created to support surface water drainage function
- 10

New high quality homes fronting Whitchurch Road
- 11

New high quality homes overlooking central parkland
- 12

New rural inspired homes
- 13

Potential link to adjoining land