

Planning Policy
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To Whom It May Concern

Bloor Homes: Land at Whitchurch Road, Chester – Site Specific Representations to the Cheshire West and Chester Local Plan Regulation 18 Issues and Options Consultation

Lichfields has been appointed to prepare representations on behalf of Bloor Homes [Bloor] to Cheshire West and Chester Council's [the Council] consultation on the Local Plan Regulation 18 Issues and Options [LPIO]. These representations are prepared in the context of Bloor's land interest at Whitchurch Road, Chester.

The emerging Cheshire West and Chester Local Plan will create a single local plan document that replaces all policies in the current Local Plan (Part One) and Local Plan (Part Two). The LPIO sets out a vision and framework to shape the future development of Cheshire West and Chester.

It is important to note at the outset that Bloor welcomes the progression of the Local Plan and acknowledges the Council's efforts in preparing LPIO document. It is essential that the Council adopts a Development Plan that aligns with national policy as soon as possible, to ensure that the appropriate levels of housing and economic growth are delivered in a sustainable manner to meet future needs.

Land at Whitchurch Road, Chester

Bloor has an interest in land at Whitchurch Road, Chester [the site]. 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.

The site does not fall within or adjacent to an Air Quality Management Area, is not located within a Conservation Area, and there are no listed buildings or scheduled ancient monuments within the site. The site falls entirely within Flood Zone 1, and whilst there are isolated areas of medium and high risk of surface water flooding towards the south of the site, these correspond with existing natural depressions in the land, natural conveyance routes and land drainage ditches where ponding is most likely to occur during extreme and prolonged rainfall events, and would not constrain the development of the site.

The site sits to the south of Whitchurch Road, and is bound to the east by the Mercure Chester Abbots Well Hotel and an area of woodland situated adjacent to A55 North Wales Expressway, to the west by allotments beyond which lies Boughton Heath Park and Ride and the A55 North Wales Expressway Spur, and to the south by agricultural land.

The site is positioned within a wider parcel of land enclosed by the A55 North Wales Expressway to the east and the Expressway spur to the west. Within this broadly triangular parcel of land is also located the Mercure Abbots Well Hotel, the Boughton Heath Park and Ride, the Boughton Heath Allotments, and the recently constructed Retirement Villages' development. There is also a further area of agricultural land, to the south of the site, which is located within this wider triangular parcel of land. The entire extent of this wider parcel of land is designated as Green Belt.

The site is under the control of Bloor, a national housebuilder with an established track record of delivery across Cheshire and the North West. Bloor has recently submitted an outline planning application for the development of up to 200 homes at Land at Whitchurch Road, Chester [the site] (Planning Portal ref. PP-14088479).

The illustrative masterplan submitted as part of the application is included at **Annex 1** of these representations and demonstrates the site's ability to accommodate a residential development of the quantum that is well related to the existing settlement. The proposals represent a high quality development and establish the parameters that will be brought forward to reserved matters. Full access details are provided as part of the application, with access taken from Whitchurch Road.

A detailed suite of technical documents has been submitted as part of the application pack and demonstrate the site's suitability for residential development. The documents demonstrate that there are no significant constraints that would prevent the development of the site and have informed the parameters set out in the application. An appropriate net gain in biodiversity is achievable as part of the proposals.

Bloor is in a position to submit a reserved matters application shortly after the grant of outline permission on the site, and the site is deliverable within the emerging plan period.

The site is included within the larger 'CH02' land parcel, identified as a growth option for housing within Map 5.4 of the LPIO, sitting in the southern portion of the larger parcel. Area ref. 'CH02' (Chester East – Piper's Ash) is noted to encompass 205.5 ha of land, with a housing estimate of 4,316 dwellings.

Grey Belt

Exceptional circumstances are considered to exist, justifying changes to Green Belt boundaries via this emerging Plan in order to meet the Borough's LHN in full. In accordance with Paragraph 148 of the Framework, where it is necessary to release land within the Green Belt for development, priority should be given first to previously developed land, followed by grey belt land that has not been previously developed, and finally to other Green Belt locations. It is considered that there is insufficient land available within the urban area or on allocated sites, therefore the Council must identify and release appropriate grey belt land to meet development needs.

Grey belt is defined at Annex 2 of the NPPF as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in Paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.

The site has therefore been considered against the relevant purposes of the Green Belt, in the context of the Planning Practice Guidance [PPG], an assessment against which is included in Table 1 below.

Table 1 Lichfields Assessment of the Site against purposes a, b and d

Green Belt Purpose	Assessment Against GB Purpose
(a) To check the unrestricted sprawl of large built up areas.	The site makes a weak contribution to purpose (a) , due to the presence of scattered development and existing road infrastructure to the north and the degree of containment provided by the A55. The A55 provides a durable definitive feature that separates the site from the wider landscape to the east, and would form a clear defensible boundary.
(b) To prevent neighbouring towns merging into one another.	The site makes no contribution to purpose (b) , as the site does not form part of a gap between Chester and the 'urban settlement' (town) of Ellesmere Port to the north. In addition, the site is situated to the west of Christleton, which is a village rather than a town, and experiences limited visual connectivity with the village as a result of the bridge and elevated form of the A55 dual carriageway and intervening vegetation preventing coalescence.
(d) To preserve the setting and special character of historic towns.	The site makes no contribution to purpose (d) , as whilst Chester is a historic town, the site is not located within or adjacent to the historic core of the city, and it does not form part of a key approach or gateway that contributes meaningfully to Chester’s historic setting. In addition, the site’s surrounding context is characterised by suburban development, transport corridors, and semi-urban fringe elements, therefore the site does not form part of the immediate or sensitive setting of Chester’s historic townscape.

Source: Green Belt Assessment, prepared by Fabrik.

From the above, it is evident that the site does not strongly contribute to any of the Green Belt purposes which are included in the grey belt definition.

From technical work undertaken to accompany the planning application submitted on the site, it is not considered that the site is subject to any Footnote 7 constraints that would provide a strong reason for restricting development.

The site therefore meets the criteria included within the definition of grey belt, and should therefore be considered for release from the Green Belt through the emerging Local Plan, providing the opportunity to contribute to the Council’s supply of housing land on a deliverable site with no significant constraints.

Local Plan Issues and Options

The following sections provides comments on the LPIO consultation document and should be read in the context of the land at Whitchurch Road, Chester.

Chapter 1: Introduction

The introductory section to the LPIO consultation document provides detail on the background to the consultation, the scope of the emerging Local Plan, the evidence base, the plan period, and next steps. In particular, it is noted in this section that the Council consider the appropriate plan period to be 15 years.

National planning policy specifies that strategic policies should look ahead over a minimum 15 year period from adoption to anticipate and respond to long-term requirements and opportunities. The adopted Local Development Scheme (May 2025) notes that adoption is expected in summer/autumn 2027, with a fifteen year period taking the Local Plan to 2042, Bloor considers that it would be appropriate for the Council to plan for a slightly longer period to 2045, allowing greater flexibility for any delays that are encountered during the plan making process and ensuring that the emerging Local Plan genuinely does anticipate and respond to long-term development needs.

Chapter 2: Vision

Proposed Approach VI 1: Vision

VI 1 sets out the proposed vision for Cheshire West and Chester, aspiring to be a desirable and attractive place to live, work, learn and visit. VI 1 also provides four overarching principles, namely tackling climate change, promoting wellbeing, providing infrastructure and protecting character.

Bloor supports the Council's overarching vision and the four principles by which this will be achieved. However, there is a lack of focus on new homes within this Plan. Given that the Council is seeking to establish the Borough as an attractive place to live, the delivery of new homes is fundamental to ensuring that housing provision is not only planned but also realised. As such, Bloor suggests that the overarching principles be amended to provide a more explicit focus on new homes in the Borough.

Chapter 5: Spatial Strategy

Proposed Approach SS 1: Housing needs

Policy SS1 states that the Council plans to deliver a minimum of 1,914 new homes per year over the plan period. For a 15-year plan, this equates to a total of 28,710 new homes assuming a 2025 start date. This minimum figure is based on the Council's Local Housing Need [LHN] as of December 2024, calculated using the revised stock-based methodology introduced alongside the December 2024 iteration of NPPF.

Bloor supports the Council's use of its LHN figure in the emerging Local Plan, as it enables proactive planning to meet housing needs. However, the 1,914-dwelling requirement is no longer reflective of the current LHN. Following the release of updated housing stock data and March 2025 affordability ratios, the Council's LHN now stands at 1,928 dwellings per year. Accordingly, the policy should reflect the most up-to-date LHN when the draft Local Plan is published as a minimum. Additional flexibility

should be built into this figure to reflect the adoption date of the plan, whilst also accommodating any delays that may arise during the plan-making process. Pursuing a 20 year plan period to 2045 would increase the requirement for new homes to over 38,000 dwellings, a more appropriate figure to ensure that needs are met.

Additionally, Bloor considers that a 10% buffer should be included to this figure, as recommended by the Local Plan Expert Group, to ensure sufficient flexibility, choice and competition in the market for land, which would require c. 42,000 dwellings be delivered over the 20 year period.

To accommodate this level of development, Chester should be seen as an ideal location for the development of a significant portion of the Borough's new housing, having been identified to accommodate almost a quarter of the Borough's residential development in the current plan period. Bloor considers that Chester, being the Borough's largest settlement with a range of facilities and services and strong transport connectivity, should as a minimum accommodate a similar proportion of residential development as in the adopted Local Plan.

Bloor does not support the use of a stepped housing requirement, as efforts should be made to meet the full annual need from the outset of the plan period. A stepped requirement in Cheshire West would be counterintuitive particularly given the immediate need for market and affordable homes in the authority coupled with the high annual delivery, which broadly aligns with the standard method requirement, over the past decade.

In light of the national housing shortage, an issue affecting both the Borough and the wider North West too, it would be inappropriate for the Council to delay immediate action by backloading the requirement. This is especially the case as there are numerous deliverable sites, such as Whitchurch Road, being promoted for development which can meet needs in the early years of the plan period. Therefore, Bloor recommends that a fixed annual requirement be adopted to ensure timely delivery of the necessary number of homes.

Proposed Approach SS 3: Spatial strategy principles

Policy SS3 states that the spatial strategy will prioritise directing new development and land allocations towards previously developed sites within settlements. Where necessary, development will then be directed to the edges of existing settlements, particularly in locations with good access to public transport, services, and infrastructure, which may require the release of Green Belt land.

Bloor supports this approach, recognising the importance of bringing underutilised urban sites back into active use, while also acknowledging the need for greenfield development on the edge of settlements. However, Bloor is keen to ensure that the strategy does not result in an over-reliance on urban and brownfield sites, given the potential viability challenges and the limited range of development types that such sites can accommodate. In particular, it should be noted that the Council's own Land Availability Assessment (Stage One) report suggests that there is only capacity for c. 5,000 dwellings on previously developed land without planning permission, including undeveloped Local Plan allocations, within the main urban areas and Key Service Centres, well below the minimum number of dwellings required in the plan period and only enough to accommodate c. 2.5 years of new homes based on the Council's LHN. It is also important to note that some settlements within the Borough, such as Chester, have a constrained supply of urban and brownfield land. Therefore, the spatial strategy should

reflect the varied characteristics of the Borough and incorporate sufficient flexibility to respond to local circumstances.

Proposed Approach SS 4: Settlement Hierarchy

Policy SS4 outlines that the new Local Plan will establish a settlement hierarchy based on each settlement's role in providing infrastructure and services to its population and surrounding hinterland. The proposed hierarchy includes the following:

- 1 Chester (city)
- 2 Ellesmere Port (main town)
- 3 Northwich (main town)
- 4 Winsford (main town)
- 5 Neston and Parkgate (market town)
- 6 Frodsham (market town)

Bloor supports Chester's position at the top of the hierarchy, reflecting its large population and the breadth of services and facilities it offers. Chester presents a clear opportunity to accommodate a proportionate level of development and is the logical choice for the top-tier settlement. Ellesmere Port, Northwich, and Winsford each play an important role within the Borough and support Chester in its role as the largest settlement.

Proposed Approach SS 5: Spatial Strategy Options

Policy SS5 outlines three growth options for the distribution of development across the Borough:

- a Option A – Retain the Green Belt
- b Option B – Follow current Local Plan level and distribution of development
- c Option C – Sustainable transport corridors

Option A focuses housing development in areas outside the Green Belt, such as south of Northwich, southwest of Winsford, and around settlements like Tarporley, Tattenhall, Malpas, and Farndon. This option would retain the Green Belt and would not result in any release through the new Local Plan.

Option B proposes continuing the approach set out in the existing Local Plan, with large urban extensions around Chester, Ellesmere Port, Northwich, and Winsford, and limited development in smaller settlements. This option includes the release of Green Belt land to accommodate approximately 11,000 dwellings.

Option C also involves Green Belt release, but with a more balanced distribution, with modest development around major settlements and increased development in smaller settlements with rail stations or along bus corridors. Green Belt release in this instance would accommodate in excess of 12,000 dwellings.

Bloor is broadly supportive of both Option B and Option C, as they allow development to be directed to the most sustainable locations within the borough. It would be illogical to avoid such locations solely to protect the Green Belt, particularly when national policy provides a clear framework for its release.

Additionally, much of the northern part of the Borough is constrained by Green Belt. This includes the land around Chester. Allowing Green Belt release in these sustainable locations ensures that new homes are positioned close to essential services and amenities. Avoiding Green Belt release would lead to an over-reliance on smaller settlements in the south of the Borough, which often lack the same level of infrastructure and sustainability credentials. While these settlements should accommodate a proportionate level of growth, directing the majority of development to them would not represent a sustainable spatial strategy.

Bloor would additionally like to highlight the latter paragraphs of SS 5, noting the findings of the Inspector's report on the examination of the adopted Local Plan (Part One) which concluded that additional release of Green Belt land around Chester would have a significant adverse effect on the purposes of including land within the Green Belt including to the historic setting, and that the amended Green Belt boundary proposed was capable of enduring and would not need to be altered at the end of the plan period (2030). To this regard, the Inspector's report was published in 2014 and considered the adopted Local Plan in a vastly different policy context, and against an objectively assessed need for housing well below the current LHN. It would be inappropriate to draw out the conclusions from this report and apply this to the emerging Local Plan given the currently incomparable context.

Looking to the site itself, the Cheshire West and Chester Stage One Green Belt Study, prepared in 2013 as part of the evidence base for adopted Local Plan (Part One), noted that in regard to wider 25ha study area four (Land South of Whitchurch Road), the triangular land parcel in which the site sits, there were no views in to or out of the city due to the land's topography, and that the landscape and setting is fragmented within the parcel in relation to this Green Belt purpose (d).

The Cheshire West and Chester Stage Two Green Belt Study (2013) similarly noted that whilst the removal of this parcel would impact on the area's ability to maintain the remaining gap between Chester and Christleton and affect its role in helping to define the setting and special character of the historic city, current land use patterns have already compromised the gap between the city and the village to some degree and the new boundary following removal from the Green Belt would not reduce the distance between the city and Christleton. The argument that the release of this area in particular from the Green Belt would significantly impact the historic setting of Chester therefore does not appear to be substantiated, especially given the additional guidance on assessing the contribution land makes to the Green Belt purposes provided in the PPG (Paragraph: 005 Reference ID: 64-005-20250225).

Of particular note, since the preparation of the Stage One and Two Green Belt Study, a retirement village has come forward in the northwest of the parcel on the site of the former Beechmoor Garden Centre, allowed at appeal in 2019 (ref. APP/A0665/W/18/3203413), further urbanising the wider parcel.

Bloor therefore considers that it is inappropriate for the Council to rely on the conclusions of the Inspector's report here, which are not entirely reflective of the area specific assessments undertaken to inform the adopted Local Plan. Avoiding the release of Green Belt sites in Chester on the findings of an

Inspector's report published almost 11 years prior to this consultation would be entirely illogical, particularly given efforts to direct development to the most sustainable locations.

Looking to the final paragraph of SS 5, which recognises that there may be other approaches that could be taken outside of the three suggested options, Bloor would like to reiterate the importance of locating development in the most sustainable locations, regardless of Green Belt designation particularly given the existence of national policy mechanisms that allow for appropriate Green Belt release. Pursuing an option that avoids such release should not be considered appropriate given the nature of the Borough's existing patterns of development.

Bloor therefore recommends that the Council proceed with either Option B or Option C as the preferred spatial strategy for the new Local Plan.

Chester Growth Options

The LPIO identifies four potential growth options for Chester, three of which are for housing and one for mixed use:

- 1 'CH01': Chester North – Upton Triangle: Mixed Use, 2,359 dwellings;
- 2 'CH02': Chester East – Piper's Ash: Housing, 4,316 dwellings;
- 3 'CH03': Chester South – Wrexham Road: Housing, 2,164 dwellings; and,
- 4 'CH04': Chester North – North of Blacon: Housing, 3,141 dwellings.

All four options are identified in growth Options B and C. No growth options identified for Chester correlate with spatial strategy Option A, noting the Green Belt designation of land around Chester.

Bloor considers that the broad location 'CH02' represents the most suitable potential growth area for Chester, owing to its strong relationship with the existing settlement. The wider parcel benefits from strategic road connections public transport link into to Chester City Centre and its extensive range of facilities. The scale and location of this option offer the opportunity to accommodate a significant proportion of Chester's growth without resulting in excessive urban sprawl.

While the other identified growth options may present opportunities for expansion, Bloor considers that these would result in a more noticeable change to the settlement boundary and patterns of development that are less well integrated with the existing urban form compared to 'CH02'.

Bloor therefore recommends that the Council proceed with 'CH02' as the preferred growth option for Chester, ensuring the delivery of the new homes the city needs in a sustainable and well-connected location.

Chapter 6: Chester

Proposed Approach CH 1: Chester

Policy CH1 proposes to build on Chester's cultural and heritage assets, leveraging its strengths as a compact, well-connected centre surrounded by accessible neighbourhoods. The strategy focuses on sustainable travel, placemaking, urban living, office space, and enhancing the vibrancy of the city centre.

The proposed approach retains the content of existing policies STRAT 3 (Chester), CH1 (Chester settlement area), CH4 (University of Chester), CH5 (Chester conservation areas), and CH6 (Chester key views, landmarks, gateways, and historic skyline). However, policies relating to parking will be amended to encourage new residential and other uses within the city centre.

Bloor supports the inclusion of a place-based policy for Chester, recognising its role as the primary settlement within the Borough. However, there is concern that the policy does not place sufficient emphasis on the role of residential development to meet the City's needs. The policy should explicitly support the delivery of new homes in Chester, through a combination of urban infill and edge-of-settlement suburban development. This is essential to maintaining Chester's status as a key regional centre and ensuring its continued vitality and sustainability.

Chapter 14: Transport and Accessibility

Proposed Approach TA 1: Transport and accessibility

Policy TA1 sets out an overarching approach to minimise the need for travel by locating development where it is accessible to local services and facilities via a range of transport modes. This is guided by a vision-led strategy and a sustainable transport hierarchy. The policy specifies that new development should maximise opportunities for residents to meet their day-to-day needs within a reasonable walking distance (10 minutes or 800 metres) of their homes, while also enabling travel beyond their settlements through a variety of sustainable transport options.

In relation to parking, TA1 proposes a flexible approach to parking standards that reflects the varying levels of non-car connectivity across the Borough and allows for future changes in connectivity.

Bloor supports the principles set out in TA1, particularly the emphasis on sustainably located development with access to services and multiple transport modes. In this regard, the site is located adjacent to the primary settlement of Chester, with a significant range of services and facilities with the city, and numerous transport options from the site. Regular bus services are available from Whitchurch Road and Boughton Heath Park and Ride, and the Shropshire Union Canal provides a direct pedestrian and cycle link separate from vehicles into Chester City Centre (National Cycle Network route 45), consistent with the principles of TA1.

With regard to parking standards, Bloor supports the flexible approach outlined in TA1 and the consideration of future connectivity needs. However, Bloor requests that sufficient flexibility is maintained by avoiding the imposition of restrictive maximum parking standards across the Borough.

Chapter 19: Housing

Proposed Approach HO 1: Mix and type of housing in new developments and specialist housing

Policy HO1 outlines that the new approach to housing types and mix will be informed by a forthcoming Housing Needs Assessment [HNA]. This assessment will underpin specific policy requirements, including percentage splits for housing mix, provision of plots for self-build and custom homebuilding, and measures to meet the needs of an ageing population and residents with disabilities.

Bloor supports the Council's intention to deliver an appropriate mix of housing to meet the needs of the wider community. However, it is essential that this policy is applied with flexibility to ensure that individual sites can respond to market conditions. Certain locations may be better suited to a housing mix that differs from the recommendations of the HNA particularly in a location such as Chester where the majority of the units coming forward in the urban area are likely to be smaller apartment type developments. A rigid application of percentage-based requirements would not reflect the diverse local conditions across the Borough. Therefore, if specific percentage targets are pursued, Bloor recommends that these be expressed as ranges, with additional wording included to allow for flexible interpretation where justified.

Furthermore, viability testing of the proposed housing mix policy will be necessary as part of the emerging Local Plan particularly given the high CIL charge in Cheshire West and Chester. This testing should be completed in advance of the Regulation 19 version of the Plan to ensure that the policy is deliverable and does not undermine the viability of development. Additionally, it is unclear whether Cheshire West and Chester will be undertaking a review of the adopted CIL Charging Schedule as part of this process, therefore Bloor would welcome clarity on this matter.

Proposed Approach HO 2: Delivering affordable housing

Policy HO2 proposes to set a percentage requirement for affordable housing across the Borough, with the potential for this to vary by sub-area. It is noted that a minimum of 50% affordable housing will be required on Green Belt sites, and that the policy will specify the types of affordable housing to be delivered. Additionally, Policy HO2 proposes that affordable housing will be required on all sites of 10 or more dwellings, with the threshold reduced to three or more dwellings in designated rural areas.

Bloor supports the inclusion of affordable housing in new developments and agrees that a threshold of 10+ dwellings is appropriate for triggering this requirement. Bloor also supports the potential for sub-area variation, ensuring that affordable housing provision reflects local market conditions and housing needs across the Borough.

Viability testing of the proposed affordable housing requirements will be essential and must be undertaken as part of the emerging Local Plan, ahead of the publication of the Regulation 19 version.

Proposed Approach HO 3: Proposals for residential development

HO 3 proposes to retain existing Policy DM 19 (Proposals for residential development), which provides the requirements for residential developments within identified settlements, the countryside, and the Green Belt.

Bloor supports the proposed retention of Policy DM 19 on the basis that the flexibility that allows for development within the Green Belt to align with the provisions in the NPPF are retained, ensuring that local policy regarding development in the Green Belt does not become out of date or unreflective of national policy.

Bloor does however request that specific references to the development of 'grey belt' land are made within the updated policy, ensuring that it is clear that development of such land is appropriate for residential development, subject to requirements of NPPF Paragraph 155 being applied.

Chapter 25: Green Infrastructure, Biodiversity and Geodiversity

Proposed Approach GI 1: Green infrastructure, biodiversity and geodiversity

GI 1 proposes to create a single policy relevant to green infrastructure, biodiversity and nature, with considerations on biodiversity net gain, tree replacement rates, and agricultural land. Bloor supports the streamlining of the numerous existing policies into one appropriate policy to cover this.

It is not considered appropriate for the Council to require a biodiversity net gain above the necessary 10% as set out under the Environment Act, however. The PPG noted that plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified (Paragraph: 006 Reference ID: 74-006-20240214).

To justify such policies, evidence will need to be provided as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development, which has not been considered at this time. Without sufficient justification, pursuing an increased requirement would not align with the appropriate guidance, and may render development across the Borough unviable, particularly in areas where the market is less strong.

Conclusion

The site represents an ideal opportunity to deliver up to 200 new homes, including affordable homes and publicly accessible green spaces to be delivered in the early stages of the plan period. The site is identified under growth options B and C set out in SS 5 (Spatial Strategy Options). Furthermore, the site was considered under the Cheshire West and Chester Stage One Land Availability Assessment (2025) and found to be suitable for residential development.

The site is controlled by Bloor, available and suitable for residential development. Bloor has submitted an outline application in relation to a residential development at the site (Planning Portal ref. PP-14088479), and has undertaken substantial technical work to demonstrate the site's suitability for a residential development. The technical work undertaken to support the planning application submission has not identified any designations or constraints that would prevent residential development coming forward on the site. The site therefore clearly meets the definition of developable.

For the reasons set out in this letter, land at Whitchurch Road, Chester should be allocated for residential development in any future version of the Cheshire West and Chester Local Plan, providing a suitable opportunity for the creation of a new sustainability community in Chester. Given the extent of new housing that the Council must provide for in this emerging Local Plan, the site provides an ideal opportunity for residential development in a sustainable location that aligns with two of the Council's spatial strategy options.

We trust that these representations will be fully considered in the formulation of the emerging Local Plan and would be grateful if you could keep us informed as to the details of the next stage of consultation.

LICHFIELDS

Yours faithfully



John Hellon

Planner

BA (Hons) MCD



Annex 1: Illustrative Masterplan

REV.	DESCRIPTION	APP.	DATE
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

J:\D3339 Land East of Chester, Chester\04 Graphics\MR - Masterplan