

MANNINGS LANE, CHESTER

AUGUST 2025

www.njlconsulting.co.uk

Signing off Sheet

Client: Miller Developments

Project: Mannings Lane, Chester

Document: Response to CW&C Issues and Options

Date: August 2025

Ref: 2020-041

Stage	Prepared By	Checked By	Date	Signed
1	AT	NL	26/08/2025	

Final

Authorised for and on behalf NJL Consulting

Nick Lee
Managing Director

This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party. Any such party relies on this report at their own risk.

© Report copyright of NJL Consulting

NJLConsulting
Planning+Development

Origin
6th Floor
70 Spring Gardens
Manchester
M2 2BQ

Contents

- 1. Introduction 1
- 2. Site Context..... 2
- 3. Response 4
- 4. Conclusions..... 21

1. Introduction

- 1.1 This Statement has been prepared in response to the Cheshire West and Chester Council ('the Council' & 'CW&C') Issues and Options Consultation (2025), in relation to our client's, Miller Developments ('the developer'), interest in Land at Mannings Lane, Chester ('the site').
- 1.2 This follows on from the Summary Update Report (NJL, ref: 2020-041) submitted to the Council in July 2025 and provides further information regarding the background to the site and confirms the position on various technical matters.
- 1.3 Overall, Miller Developments consider that several of the proposed options within the consultation document are positive and can enable the required levels of growth. It remains critical, however, that the Council's ambitious economic growth and housing need targets are fully aligned in order to deliver the most sustainable patterns of development, and we comment on the consultation on this basis.
- 1.4 These comments focus on Miller Developments' existing site on the east side of Chester, which sits within area CH02 identified within the Issues and Options Draft Spatial Strategy options (see extract below), but also cover wider policy proposals.

Map 5.4 Chester growth options

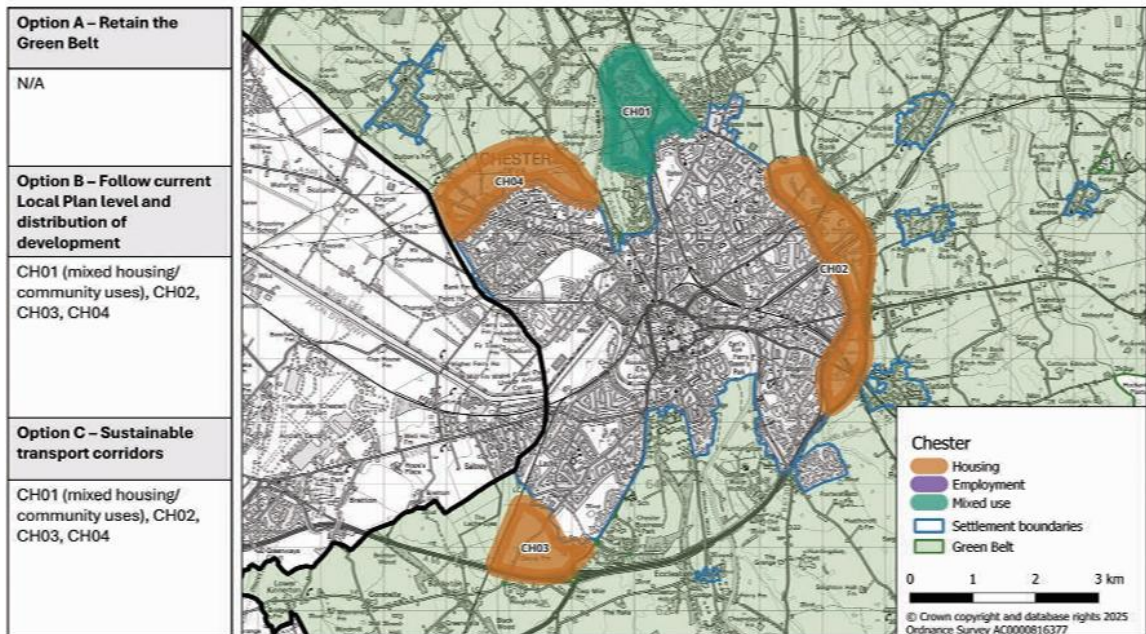


Figure 1 Extract of Chester Growth Options - Issues and Options Consultation

2. Site Context

- 2.1 The Miller Developments site presents a strategic opportunity for development, comprising an extensive fringe urban site to the east of Chester, off Hoole Road. The site is ideally located in a key gateway location with the junction of the A56/ M53 to the east, Mannings Lane to the north and Chester Millennium Greenway to the south. A variety of existing residential dwellings are located along the northern and western site boundaries.
- 2.2 The site itself comprises 66 acres to the south-east and north-west of Mannings Lane. The land to the south is approximately 44 acres of largely grazing land and is generally flat in topography. There is an existing allocation for a Park and Ride facility in the eastern corner of the site, with access via the A56. It is anticipated that additional access points will be achieved on Mannings Lane and/or A41.



Figure 2 Aerial Image of Site (red line not to scale)

- 2.3 To the north of Mannings Lane is approximately 22 acres of grazing land, adjacent to the Chester County Sports and Cricket Club to the south-west and north-west. The land is bound to the south-east and north-east by Mannings Lane and the M53.
- 2.4 The entire site is located in Flood Zone 1 and therefore at low risk of flooding. Two watercourses (identified as ditches/land drains) run through the central spine of the southern site from west to east, and then along the northern boundary adjacent to residential properties.
- 2.5 In terms of ecological value, no part of the site is allocated as designated habitat or of nature conservation importance. Five ponds are located within the southern site which

will require further surveying in order to identify the extent of any Great Crested Newt populations.

- 2.6 There are no Tree Preservation Orders on site, however strong hedgerow boundaries and mature tree cover are present. This provides ecological value to local wildlife and habitats as well as potential place-making opportunities through the retention of green infrastructure.
- 2.7 There are no listed buildings on the site, nor is it located in a Conservation Area. The closest heritage asset is the Grade II listed Hoole Hall, which is located approximately 350m to the south of the site; however, it is sufficiently screened by existing residential development and the intersection of the A55 such that the site's development will have little or no impact.
- 2.8 The ambition for the site is to deliver a high quality, sustainable residential development, incorporating 45% Affordable Homes (of a range of tenure types), supported by a new 'Active Living Zone and Hub', where non-car use, active travel and promotion of long-term active living for residents are at the heart of the development.

3. Response

Spatial Strategy

SS 1 - IS THERE ANY REASON FOR THE COUNCIL NOT TO DELIVER THE 1,914 DPA REQUIRED?

- 3.1 The revised Standard Method calculation, which resulted in the 1,914 dpa requirement, was designed to provide a **minimum** housing need figure in order to address the national shortfall in the supply of homes, and to support and enable growth in local areas.
- 3.2 Whilst it is possible for this number to be reduced in constrained locations, where exceptional circumstances can be justified, we do not believe that such justification exists in Cheshire West and Chester. This is demonstrated within the Issues and Options consultation report, which has identified a number of different options for delivering the required minimum figure.
- 3.3 Cheshire West and Chester's Housing Strategy 2025-2035 states that there are 6,735 applicants registered on the housing waiting list. Furthermore, the Economic Needs Assessment shows a significant and steady growth in Employment within the assessment period (up to 2045).
- 3.4 The evidence base clearly demonstrates that significant housing is needed, and as such the standard method should be the starting point for delivery. The shortfall in supply is chronic and needs to be addressed through emerging Local Plan.
- 3.5 Furthermore, the PPG states how a range of circumstances may justify the determination of housing need which exceeds the standard method minimum, and that an assessment of need which establishes a figure which is higher than the standard method minimum will be considered sound if it "*adequately reflects current and future demographic trends and market signals.*"
- 3.6 It is therefore important to consider whether any factors justify an increase in the Standard Method minimum when determining housing need but at the very least, there is no reason as to why the Council should drop below the identified dwellings per year as set out.

SS 2 - DO YOU THINK THE COUNCIL SHOULD CONSIDER A STEPPED HOUSING REQUIREMENT THAT PLANS FOR LOWER LEVEL OF HOUSING DELIVERY EARLIER IN THE PLAN PERIOD?

- 3.7 A stepped approach, as detailed within paragraph 12 of the Planning Practice Guidance ('PPG') for Housing Supply and Delivery, may be considered in relation to a significant change, or for strategic sites requiring a phased approach.
- 3.8 The revised housing requirement represents an 800-dwelling increase, which may be seen as significant; however, CW&C reported in their latest Housing Monitoring Report (2024-2025) that in the last three years completions were as follows.

Year	2022-2023	2023-2024	2024-2025	Total
Number of homes required	567	532	504	1,603
Net annual completions	1,401	1,366	1,215	3,982

- 3.9 It is clear that as a Council, CW&C have been performing well against their previous requirement and delivering homes significantly higher year on year. As such, the revised target of 1,914 as set out in SS 1 should not be a significant jump in what the Council can provide.
- 3.10 As set out through the following questions, whilst one spatial option is to deliver homes through larger strategic sites that could see slower or phased delivery whereby a stepped housing requirement could be suitable, we are of the view that this option should **not** be the preferred route. This would not allow for the for a distribution that suits identified needs throughout the borough.
- 3.11 Whilst the Council has been performing well against previous targets, the Council can currently only demonstrate a 2.09 year supply of housing land, and the evidence base has demonstrated a clear shortfall in homes. There is a clear need for immediate delivery of new housing, and for the Council to identify suitable sites for immediate delivery to rebalance the revised housing need as well as sites to meet this position throughout the emerging Local Plan period.
- 3.12 The PPG states that stepped housing requirements must be appropriately evidenced, and "*not seek to unnecessarily delay meeting identified development needs*". We do not believe that such evidence exists, in that suitable sites for the supply of housing can be identified for delivery throughout the plan period, without the reliance on larger/strategic sites.
- 3.13 As such, we do not believe it appropriate to consider a stepped housing requirement.

SS 4 - DO YOU AGREE WITH THE SUGGESTED POLICY APPROACH TOWARD THE SPATIAL STRATEGY PRINCIPLES, AS SET OUT IN SS3 'SPATIAL STRATEGY PRINCIPLES' ABOVE? IF NOT, PLEASE SUGGEST HOW IT COULD BE AMENDED?

- 3.14 The spatial strategy principles set out to firstly direct new development and allocate land toward previously developed sites in settlements. Where this is not sufficient, to develop on the edge of existing settlements in locations with the best access to public transport and existing services and infrastructure.
- 3.15 The principles also note that, depending on the settlement, this may require release of Green Belt land.
- 3.16 We agree that previously developed land may be first allocated if the sites are demonstrated as deliverable; however, given the limited brownfield capacity in CW&C, it is clear that greenfield sites will need to be brought forward in and around settlements in order to meet the minimum housing requirement.
- 3.17 Furthermore, previously developed land frequently comes with constraints such as existing buildings and contaminated land which can cause lengthy delays in the delivery of housing. In order to ensure a continuous supply of housing, it will be necessary to enable suitable greenfield sites to come forward alongside previously developed land. In order to facilitate this, we would agree with the release of suitable sites within the Green Belt.
- 3.18 As such, SS3 should be amended to reflect the need for urban extensions in order to meet the housing requirement. This may be reworded to "where additional land is required to meet the housing requirement, the approach will be to develop on the edge...".

SS 5 - DO YOU AGREE WITH THE SUGGESTED POLICY APPROACH TOWARD THE SETTLEMENT HIERARCHY, AS SET OUT IN SS 4 'SETTLEMENT HIERARCHY' ABOVE? IF NOT, PLEASE SUGGEST HOW IT COULD BE AMENDED.

- 3.19 The proposed settlement hierarchy sets out the key settlements as Chester (City), Ellesmere Port (Main Town), Northwich (Main Town), Winsford (Main Town), Neston and Parkgate (Market Town) and Frodsham (Market Town). Each of these settlements will have individual place-based policies within the emerging Local Plan.
- 3.20 Additional settlements are also identified as able to meet the day-to-day needs of residents and those in surrounding areas. Beyond this, the hierarchy notes that smaller settlements could acceptably accommodate infill development and small previously developed sites.
- 3.21 We agree with the proposed settlement hierarchy. Chester is clearly the most sustainable location, and as such should accommodate the most growth in order to meet the needs of local residents. This is also reflective of the current and proposed ambitions for Chester as a Sub-Regional City.
- 3.22 Furthermore, the Council has identified Chester as a key location for significant economic growth, both within the emerging Local Plan proposals, and within existing policy. The One City Plan for Chester, which was last updated by CW&C in 2024, sets out a key theme as 'Business Friendly, Economy and Skills'. Within this, the Council has committed to attracting inward investment by focussing on growth opportunities, marketing the city as a place for business and to become a thriving city.
- 3.23 In order to achieve the economic ambitions for Chester, significant additional housing will be required. The Local Plan must accommodate additional housing to Chester to account for the economic skew within the city.

SS 9 - HAVE CIRCUMSTANCES CHANGED SINCE THE ADOPTION OF THE LOCAL PLAN (PART ONE), THAT WOULD NOW JUSTIFY GREEN BELT RELEASE?

- 3.24 The NPPF outlines the process for review under paragraph 145, noting that the boundaries should only be altered where "*exceptional circumstances are fully evidenced and justified through the preparation or updating of plans*". The NPPF goes on to note that exceptional circumstances include where LPA's cannot meet its identified need for homes, commercial or other development through other means.
- 3.25 Whilst the Council has previously been able to meet its housing need, the identified requirement of 1,914dpa represents an exceptional circumstance; particularly in light of the Council being currently only able to demonstrate a 2.09 Year Housing Land Supply, well below the 5-year supply required by national policy. As such, circumstances have changed to justify Green Belt release.
- 3.26 We believe that, subject to a formal Green Belt Review, a number of sites can be identified that are suitable for release around Chester in order to meet the identified housing requirement. In particular, the Miller Developments site at Mannings Lane is suitable due to the clear and defensible boundary formed by the A55 North Wales Expressway to the east, connections to Hoole and opportunities for sustainable travel.

SS 10 - ARE THERE ANY OTHER CONSIDERATIONS WE SHOULD ACCOUNT FOR IN RELATION TO FUTURE GREEN BELT POLICY?

- 3.27 Whilst it is expected that, through a review of the Green Belt and limited release, appropriate land can be identified within the emerging Local Plan to meet the revised housing requirement, it is expected that additional sites will be required as some

identified sites may not come forward in the plan period. A site's location within the Green Belt should not preclude development, in particular where sites meet Grey Belt definitions and or can demonstrate connections to sustainable travel. Within the Chester context, the Chester Millenium Greenway is a key sustainable transport corridor that should be considered.

- 3.28 As such, we would expect policy DM19 to be retained within the emerging Local Plan, with specific reference to Grey Belt added, in accordance with the revised NPPF.

SS 11 - PLEASE SELECT THE OPTION WHICH IS THE MOST APPROPRIATE SPATIAL STRATEGY FOR CHESHIRE WEST AND CHESTER:

- **Option A - Retain the Green Belt**
- **Option B - Follow the current LP level and distribution of development**
- **Option C - Sustainable Transport corridors**
- **None of these**

- 3.29 The detail of each option is discussed in more detail below, under option specific questions, however at present, we support none of the presented options in their current form.

- 3.30 Miller Developments believe that subject to the detailed amends, Option B is the best option, however, the sustainable principle of option C is supported and would be the next preferred option.

SS 12 - DO YOU HAVE ANY ALTERNATIVE SPATIAL STRATEGY OPTIONS THAT YOU WOULD LIKE TO SUGGEST?

- 3.31 The spatial strategy must accommodate the minimum housing requirement as established by the standard method and enable immediate growth to address the shortfall in homes within the council area. In accordance with the Spatial Strategy Principles, the strategy should direct development to the most sustainable areas, both within and on the edge of settlements.

- 3.32 From a review of all options, an adaptation of Options B & C, with a greater focus on overall sustainability to include the presence/provision of local services and through matching housing growth with economic growth would be the most appropriate approach.

- 3.33 By doing so, this alternative approach would:

- Prioritise brownfield and urban regeneration sites where available.
- Direct growth to main settlements (Chester, Ellesmere Port, Northwich, Winsford) but avoid an over reliance on a few very large urban extensions. Chester should be considered for a greater amount to align with economic ambitions.
- Allow smaller, proportionate growth in Local Service Centres and rural settlements to sustain schools, shops, and services.

- 3.34 The benefits of an alternative proposition would be as follows:

- Deliverable: it would avoid an over-reliance on a few large, infrastructure-heavy urban extensions that could delay.

- Sustainable: it would support travel by train and bus, reduces car dependency, and strengthen smaller communities whereby development supports improved infrastructure.
- Balanced: by doing so it would allow growth to be distributed fairly across the key places, towns, villages, and the rural area.
- Defensible: it still allows for targeted Green Belt release where contributions to the Green Belt purposes to not strongly contribute.

3.35 Overall, the key to this approach would be to spread growth across multiple settlements which reduces risk and ensures flexibility if some sites don't come forward as planned. This approach would enable settlements targeted for greater economic growth to sustainably meet increased housing requirements.

SS 14 - DO YOU FEEL THAT OPTION A IS AN APPROPRIATE SPATIAL STRATEGY FOR THE NEW LOCAL PLAN?

3.36 For Housing Development, Option A includes:

- Major development in and to the south of Northwich of just over 5,000 homes.
- Significant urban extensions to the south/west of Winsford of more than 11,000 homes.
- Growth around places that are not located within the Green Belt, such as Tarporley, Tattenhall, Malpas and Farndon.
- More limited development to the south/east of Tarvin, Kelsall and Cuddington & Sandiway on sites that are not in the Green Belt.

3.37 Option A is unsuitable for a number of reasons. Firstly, the option is reliant on Major Urban Extensions for over 55% of its housing requirement. Major Urban Extensions require considerable infrastructure and typically take upwards of 15 years to deliver. The delivery of homes would therefore likely not occur, at least entirely, within the plan period. This would put the Council at risk of a significant shortfall of delivery.

3.38 This is particularly relevant to the proposed 11,000+ homes to the south/west of Winsford. The existing Local Plan, alongside the Winsford Neighbourhood Plan, allocated land to the south/east of Winsford for 1,000 new dwellings, to be known as the Station Quarter. Of this allocation, just 215 homes have been approved, with the final homes still to be complete. As such, it is unlikely that Winsford would deliver the proposed additional MUE, as it is significantly behind in the delivery of Station Quarter.

3.39 Furthermore, Major Urban Extensions within Northwich and Winsford would not appropriately address the housing need for Chester, nor does it support Chester as a sub-regional city. Option A allocates just 1,500-3,000 dwellings to Chester, despite naming Chester as a focus for office development and areas for development within existing employment areas and identifying Chester at the top of the Settlement Hierarchy.

3.40 The underdevelopment of housing within Chester would undermine the economic growth ambitions and could also encourage unsustainable patterns of travel. Significant housing development should be directed to Chester to support the economic profile of the city.

3.41 Option A is therefore inappropriate due to the poor distribution across the district and the over reliance on long-term strategic extensions.

SS 15 - IF YOU DO NOT FEEL THAT OPTION A IS AN APPROPRIATE SPATIAL STRATEGY OPTION, ARE THERE ANY CHANGES YOU COULD SUGGEST?

- 3.42 Option A should be discarded as an option for the Local Plan. The MUE could be safeguarded for the next plan period, or allocated in addition to the housing figures required.

SS 16 - DO YOU FEEL OPTION B IS AN APPROPRIATE SPATIAL STRATEGY FOR THE NEW LOCAL PLAN?

- 3.43 For Housing Development, Option B includes:
- Large urban extensions around: Chester, Ellesmere Port, Northwich and Winsford.
 - Total Green Belt release of sites to deliver 11,000 homes.
 - Relatively limited development in Cuddington and Sandiway, Farndon, Frodsham, Helsby, Kelsall, Malpas, Neston and Parkgate, Tarporley, Tarvin and Tattenhall of 3,000 homes in total.
 - 2,500 homes across the rest of the rural area, including both Green Belt and non-Green Belt land.

- 3.44 The allocation of development within and around Chester is supported and should be developed further; however, the overall distribution should be considered to account for small and medium urban extensions in these areas, in order to enable faster delivery and ensure a range of housing is available to meet the needs of Chester's communities.

SS 17 - IF YOU DO NOT FEEL THAT OPTION B IS AN APPROPRIATE SPATIAL STRATEGY OPTION, ARE THERE ANY CHANGES THAT YOU COULD SUGGEST?

- 3.45 Whilst we believe Option B could be appropriate, an increase in the housing number for Chester is required to account for the significant economic growth proposed within the city.

SS 18 - DO YOU FEEL THAT OPTION C IS AN APPROPRIATE SPATIAL STRATEGY FOR THE NEW LOCAL PLAN?

- 3.46 For Housing Development this option includes:
- A wider distribution pattern of development
 - More modest urban extensions around Chester, Ellesmere Port, Northwich and Winsford.
 - Smaller settlements with a rail station, such as Cuddington & Sandiway, Helsby, Frodsham and Neston and Parkgate would take a bigger role in accommodating development.
 - Total Green Belt release of sites to deliver 12,000 homes.
 - Potential for further development in rural area and in places along bus corridors including: Farndon, Malpas, Tarporley, Tarvin and Tattenhall.
 - Potential for enhanced role around rural rail stations including; Acton Bridge, Capenhurst, Delamere, Elton, Hooton, Lostock Gralam and Mouldsworth.
- 3.47 Option C provides a strong basis for a spatial strategy, at settlements served by strong transport infrastructure (e.g. Chester and its suburban areas including Hoole). This is

supported as it reduces car dependency and provides access to sustainable travel with Chester/Hoole benefiting from a railway station, bus connections, and strategic access via the A41/M53.

- 3.48 However, Option C currently fails to identify sufficient land to support an appropriate amount of growth for Chester, in accordance with the Settlement Hierarchy and economic ambitions.
- 3.49 Furthermore, the sites identified for development around rural rail stations fail to fully consider the principles of sustainable development; many of the locations would be unsuitable for housing due to a lack of services and facilities.
- 3.50 As such, Option C is not an appropriate spatial strategy in its current form. We would advocate on an alternative approach utilising the same principles but drawing in an element of Option B whereby the strategy establishes a greater distribution level but is also where it is most logical and appropriate.

SS 19 - IF YOU DO NOT FEEL THAT OPTION C IS AN APPROPRIATE SPATIAL STRATEGY OPTION, ARE THERE ANY CHANGES THAT YOU COULD SUGGEST?

- 3.51 Option C should be reviewed to further consider appropriate locations well connected to the principal settlements identified within the Settlement Hierarchy by bus, as well as train. As part of this exercise, settlements should also be assessed against the local services and facilities available, and the opportunity for genuinely sustainable alternatives such as encouraging active travel (cycling and walking).
- 3.52 Furthermore, additional development must be allocated to Chester, through a series of modest urban extensions and individual sites to meet the housing needs of the city.

SS 20 - DO YOU THINK THE POTENTIAL 'SHOWSTOPPER' CONSTRAINTS IDENTIFIED ABOVE, ARE CORRECT OR ARE THERE ANY OTHERS THAT WE SHOULD CONSIDER?

- 3.53 The proposed constraints are as follows:
- Local Green Spaces
 - Designated habitats sites
 - SSSIs
 - Irreplaceable habitats
 - Designated heritage assets
 - Key settlement gaps
 - Areas of Special County Value
 - Strategic open space
 - Areas of Flood Risk
 - Significant hazard zones
- 3.54 The proposed constraints do not necessarily need to be seen as 'showstoppers' to development, however it is clear that an absence of these constraints would mean a site should given preferred status for development.

SS 21 - WHAT INFORMATION SHOULD WE TAKE INTO ACCOUNT WHEN ASSESSING SITES FOR ALLOCATION IN THE NEW LOCAL PLAN?

- 3.55 Sites should be assessed on the following information, alongside the constraints listed above;
- Connectivity – locally and to principal settlements via sustainable, in particular active travel, travel modes.
 - Density – what is achievable on site?
 - Services and facilities – Is the site well located to local amenities, such as shops, schools etc?
 - Leisure and Sports – access to leisure and sports facilities within the vicinity of the site.

Growth Options - Chester

SS 23 - WHICH OF THE IDENTIFIED POTENTIAL GROWTH AREAS AROUND CHESTER DO YOU CONSIDER TO BE THE MOST SUITABLE?

- **CH01 - mixed use around Moston**
 - **CH02 - housing in A41/A55 sandwich**
 - **CH03 - housing south of Lache**
 - **CH04 - housing north of Blacon**
- 3.56 We believe CH02 is the most appropriate location for growth around Chester, with particular reference to the site at Mannings Lane.
- 3.57 CH02 is located to the east of Hoole, Vicars Cross and Boughton Heath, and is contained by the A55 North Wales Expressway and A41 Ring Road to the east, south and west. Duttons Lane to the north forms the boundary of the parcel. The parcel is entirely within Flood Zone 1 and beyond existing houses that could be retained, is predominantly greenfield.
- 3.58 The parcel can be considered in two parts, with the A51 dissecting the parcel. To the north, the parcel would form a natural extension of Hoole and Vicars Cross, strengthening the defensible boundary of the green belt whilst maintaining the separation of Guilden Sutton and Littleton.
- 3.59 The northern parcel is well connected to Chester and land is allocated within this parcel for a future Park and Ride by the A56, which would further increase the sustainability of the area. Furthermore, within the parcel, the Mannings Lane site is the only site proposed for potential Green Belt release which could achieve a direct connection to the Millenium Greenway, a key active travel route.
- 3.60 The early development of the northern parcel, in particular the Mannings Lane site, could also improve connectivity to the wider CH02 site.
- 3.61 To the south, the parcel is further dissected to by the A41, with residential development along this channel connecting to Christleton to the east. The site would form an extension to Boughton Heath, extending the existing development.
- 3.62 CH02 is also sustainably located close to the railway station (2-2.5km) and the highways network (A41 & M53), providing the most sustainable transport options.

- 3.63 CH02 is therefore the most sustainable parcel, and would, where carefully divided into suitable sites, enable the delivery of modest urban extensions within the plan period and beyond.
- 3.64 CH01 is proposed for a mixed-use allocation, including the redevelopment of the Dale Barracks following its scheduled closure in 2029. The site would take a substantial amount of time to come forward due to the existing development present, and relies on the Barracks closure, which has been delayed a number of times since it was first announced in 2019.
- 3.65 Furthermore, CH01 is bordered to the north and west by the Shropshire Union Canal, with a footpath running along this boundary, creating an attractive and open walking route through the countryside, which would be adversely impacted by development along this route.
- 3.66 Significant areas of the site along this boundary are within Flood Zones 2 & 3, significantly reducing the developable area of this parcel. The site is also dissected by the railway line, further constraining the developable area due to noise and amenity impacts.
- 3.67 As such, CH01 is not considered wholly appropriate for development.
- 3.68 CH03 is proposed for housing to the south the Lache, and is contained by the railway line, A55 (North Wales Expressway) and Wrexham Road. East of the site is Chester Business Park.
- 3.69 The land to the west of Lache Lane, which runs north-south through the site, is almost entirely within Flood Zones 2 & 3, again significantly reducing the developable area. Furthermore, centrally within the site is areas approved as an Ecological Mitigation Area under 17/02444/FUL, to be maintained for a minimum of 25 years. As such, this land will not be available within the plan period and further reduces the developable area.
- 3.70 CH03 therefore does not, on its own, propose sufficient land to address Chester's housing needs.
- 3.71 CH04 is proposed to the northern edge of Blacon, north-west of the City Centre. The site bound to the east by the A540 and the west by the (administrative) boundary to Wales, with a large tree belt following this boundary. To the north, is land forming the Hynet Carbon Dioxide Pipeline, beyond which is Saughull Village. As such, the parcel is contained physically to the east, south and west.
- 3.72 The parcel is less constrained than CH01 and CH03, however there is no physical boundary to restrict the sprawl of development to the north. The parcel is also constrained by a couple of listed buildings, including Crabwall Manor.
- 3.73 We do believe CH04 is a reasonable location for development, however significant analysis would be required to protect the parcel from urban sprawl. Furthermore, the parcel is not, in isolation, sufficient to address Chester's housing needs.
- SS 24 - DO YOU HAVE ANY FURTHER COMMENTS ABOUT ANY OF THE POTENTIAL GROWTH AREAS IDENTIFIED AROUND CHESTER?**
- 3.74 Given the housing requirement and ambitions of growth for Chester, it is likely that more than one urban extension site is needed to come forward, particularly in considering the constraints identified for parcels CH01, CH03 and CH04.

- 3.75 CH02 provides the most appropriate option to encourage sustainable growth and increase active travel routes into and around Chester.

SS 25 - ARE THERE ANY CONSTRAINTS, INCLUDING INFRASTRUCTURE PROVISION, THAT SHOULD BE CONSIDERED FOR CHESTER WHEN DEVELOPING THE NEW LOCAL PLAN?

- 3.76 Specific considerations to the proposed growth areas have been set out in previous responses, in regards of constraints and individual expansion options. The strength of proposed Green Belt boundaries should be carefully considered, to ensure any growth does not encourage urban sprawl, and should increase the defensible boundaries of the settlement.
- 3.77 Provision of and access to the transport network, particularly with regards to sustainable transport options (cycleway, rail, bus), should also be prioritised in determining the areas of growth.

Green Belt

GB 1 - DO YOU AGREE WITH THE SUGGESTED POLICY APPROACH TOWARDS GREEN BELT AND THE COUNTRYSIDE, AS SET OUT IN GB1 'GREEN BELT AND COUNTRYSIDE' ABOVE? IF NOT, PLEASE SUGGEST HOW IT COULD BE AMENDED.

- 3.78 The approach to the Green Belt and Countryside proposed is supported, insofar as the inclusion of policy and/or guidance around the approach to Grey Belt land.
- 3.79 The Grey Belt is an important part of the Labour Government's strategy to deliver 1.5 million homes in 5 years. The Grey Belt should be carefully considered and should enable the delivery of land not just previously developed, but also greenfield sites that no longer serve the purposes of the Green Belt, as detailed within the NPPF.
- 3.80 However, STRAT 9 is unnecessarily restrictive, and should be amended to reflect the approach within DM 19 and the NPPF, in order to enable appropriate development to meet identified housing need, and regenerate previously developed land.
- 3.81 The NPPF sets out clear requirements for land within the Green Belt and should be adhered to within any forthcoming policy.

Other Relevant Questions

Introduction

IN 1 - DO YOU AGREE THAT THIS IS THE RIGHT EVIDENCE THAT WE NEED TO INFORM THE NEW LOCAL PLAN? IS THERE FURTHER EVIDENCE THAT YOU THINK WILL BE REQUIRED?

- 3.82 We agree with the evidence base proposed, however there is a clear need for the evidence base to include an up-to-date Open Space Assessment, to support Policy OS 1.
- 3.83 Furthermore, we would expect that the Green Belt Study to be prepared include a parcel-by-parcel assessment of land around Chester, establishing the sites contribution to the Green Belt in accordance with the purposes as defined within paragraph 143 of the NPPF. Each assessment should also consider constraints and opportunities of each parcel, such as capacity, sustainable transport and ecological designations.

IN 3 - DO YOU HAVE ANY COMMENTS OR VIEWS ON THE PROPOSED PLAN PERIOD FOR THE NEW LOCAL PLAN?

- 3.84 The proposed plan period of 15 years is supported, assuming this is 15 years from adoption; however, in order to appropriately plan for housing delivery within this period and longer term aims, further consideration is required.
- 3.85 We have previously commented that the proposed options for growth, in particular option A, proposes growth through major extensions, which would not be suitable for delivery with the plan period due to significant infrastructure required, particularly in the case of Winsford.

Vision

V 2 - SHOULD THE VISION INCLUDE/ESTABLISH A SET OF PRINCIPLES AND PRIORITIES? ARE THESE THE RIGHT ONES – DO YOU HAVE ANY OTHER SUGGESTIONS?

- 3.86 VI 1 proposes the following principles:
- Tackling Climate Change: adapting to and mitigating against the effects of climate change and achieving a net increase in biodiversity.
 - Promoting Wellbeing: enabling all to enjoy safe and healthy lifestyles with a good quality of life.
 - Providing Infrastructure: Ensuring the provision of appropriate infrastructure in suitable locations to make Cheshire West and Chester a good place to live.
 - Protecting Character: protecting the special character of the Cheshire countryside and its villages.
- 3.87 The proposed principles align with National policy, and we would agree with their inclusion within the Local Plan. However, in addition to the proposed principles, we believe it is necessary to include the delivery of housing as a priority.
- 3.88 The provision of dwellings is fundamental to the Local Plan; the NPPF describes the purpose of plans to be "*a framework for meeting housing needs and addressing other economic, social and environmental priorities*". It is evident therefore that the Local Plan's primary purpose is to ensure the delivery of housing in accordance with housing need.
- 3.89 As such, we would propose that a principle is required to ensure the delivery of housing, in appropriate locations, in order to meet local housing need, complement and support economic growth and enable local residents a choice in housing.

VI 3 - DO YOU AGREE WITH THE APPROACH OF ESTABLISHING CONCISE VISIONS FOR THE KEY PLACES IDENTIFIED IN THE NEW LOCAL PLAN? OR DO YOU HAVE AN ALTERNATIVE SUGGESTION?

- 3.90 VI 1 proposes to establish individual visions for the following places:
- Chester
 - Ellesmere Port
 - Northwich

- Winsford
- Frodsham
- Neston & Parkgate

- 3.91 We agree with the approach to establishing independent visions for each of the key places.
- 3.92 With regards to Chester, it is necessary to establish a vision in accordance with the One City Plan, as well as the specific housing and economic requirements as/to be established within the evidence base. Aligning housing growth with economic ambition and Chester's role as a key service provider within Cheshire West and Chester is critical to sustainable development.
- 3.93 We would expect that this vision includes details in relation to urban expansion, as determined through the proposed growth areas within the Spatial Strategy.

Objectives

OB 1 - PLEASE SELECT THE OPTION WHICH IS THE MOST APPROPRIATE APPROACH FOR THE NEW LOCAL PLAN?

- **Option A - Take forward current Local Plan objectives**
- **Option B - Use the Sustainability Appraisal objectives**
- **Neither of these**

- 3.94 Option B is most appropriate, as the Sustainability Appraisal (SA). has considered the impacts of the existing Local Plan objectives against the proposed sustainability objectives. Whilst some overlap is expected, it is clear that a number of objectives within Option A do not positively align with the SA. Therefore, Option B is favoured.
- 3.95 The SA objectives more accurately reflect the current environmental and political climate with regards to climate change, sustainable transport and provision of housing.

OB 5 - DO YOU FEEL THAT THE OPTION OF USING OF THE SUSTAINABILITY APPRAISAL OBJECTIVES IN THE NEW LOCAL PLAN, AS SET OUT IN OPTION B 'USE OF THE SUSTAINABILITY APPRAISAL OBJECTIVES' ABOVE, IS AN APPROPRIATE APPROACH?

- 3.96 Yes, the Sustainability Appraisal objectives should form the basis of objectives for the emerging Local Plan, in particular, we would support the inclusion of objective 15 (provision of housing) and 22 (Sustainable transport).

Chester

CH 1 - DO YOU AGREE WITH THE SUGGESTED POLICY APPROACH TOWARDS CHESTER, AS SET OUT IN CH 1 'CHESTER' ABOVE? IF NOT, PLEASE SUGGEST HOW IT COULD BE AMENDED?

- 3.97 Yes, we strongly agree with the approach, in particular the retention of the transport and infrastructure priorities as improvements to the A56 Hoole Road Corridor, and the allocation of land for a new park and ride site.

CH 2 - DO YOU HAVE ANY COMMENTS ON SUGGESTED ALLOCATIONS/SITES SET OUT ABOVE?

3.98 CH 2 refers to the following sites:

- Dale Barracks
- Chester Gateway
- Chester Business Quarter
- Northgate Phase 2
- Chester Business Park
- Chester West Employment Park and Sealand Industrial Estate

3.99 We agree with the approach to updating employment allocations to support additional growth within Chester. This should be balanced with suitable housing allocations and urban extensions, such as allocation of the Mannings Lane site detailed within this report.

CH 5 - SHOULD THE APPROACH TO PUBLIC CAR PARKS AND PARKING REQUIREMENTS IN THE CITY CENTRE AND SURROUNDING AREA BE AMENDED TO SUPPORT NEW DEVELOPMENT?

3.100 Parking standards should be amended for locations in and around Chester's urban core to reflect the presence of sustainable transport options, including the Millennium Greenway, rail and bus connections available within and around the city. Reduced standards should be, at minimum, encouraged where development can demonstrate sustainable connections, however flexibility should be provided to account for different types of parking requirements across housing types.

3.101 This will encourage sustainable travel, reduce car trip and congestion, and enable more efficient use of land.

Transport

TA 3 - ARE THERE ANY SCHEMES LISTED ABOVE IN TA 2 'KEY LOCAL TRANSPORT INFRASTRUCTURE PRIORITIES' THAT SHOULD BE RETAINED, MODIFIED OR DELETED?

3.102 TA 2 includes the T 2 A56 Hoole Road Corridor, which confirms the route for the corridor, and allocates land for a 5th park and ride site at the junction of the M53/A56.

3.103 The Corridor runs along the southeastern boundary of the Site, with the park and ride site located within the Site to the northeast. The corridor and park and ride site should be retained.

3.104 Early proposals for the Mannings Lane site allow for the continued allocation of the park and ride, and/or other transport hub solutions in this location should they be deemed more feasible. The proposals would also provide links from the Millennium Greenway to the County Sports Club to the northwest of the site.

3.105 As such T 2 should be retained within the emerging Local Plan, with flexibility over size and transport service provision.

Developer Contributions

ID 2 - SHOULD DEVELOPER CONTRIBUTIONS ONLY APPLY TO 'MAJOR DEVELOPMENTS'? HOW SHOULD THEY BE DEFINED?

- 3.106 No, contributions should not be limited to major developments. It would be expected that contributions would be calculated on a case-by-case basis with regard to a) the scale of development and b) the expected impact.
- 3.107 It is expected that some smaller developments are likely to impact infrastructure and services, and the cost of this should not fall to major developments, which will already be contributing to infrastructure as necessary.

ID 3 - DO YOU AGREE THAT DEVELOPERS SHOULD PAY THE FULL COST OF INFRASTRUCTURE REQUIRED TO DELIVER THEIR SITES?

- 3.108 No, we do not agree. Where infrastructure is required to deliver a site, but will provide infrastructure not exclusive to the scheme, a contribution commensurate of the impact of the new development on such infrastructure should be required, rather than the full cost.

Housing

HO 1 - DO YOU AGREE WITH THE SUGGESTED POLICY APPROACH TOWARDS MIX AND TYPE AND SPECIALIST HOUSING IN NEW DEVELOPMENTS, AS SET OUT IN HO1 'MIX AND TYPE OF HOUSING IN NEW DEVELOPMENTS AND SPECIALIST HOUSING' ABOVE? IF NOT, PLEASE SUGGEST HOW IT COULD BE AMENDED?

- 3.109 It is agreed that new development should be based on the most up-to date housing needs evidence, this being the Housing Needs Assessment to be prepared or any later version. The policy should also enable flexibility where local evidence and market knowledge demonstrates an alternative mix/type requirement.
- 3.110 Policies for older persons and specialist housing, including the optional technical housing standards, should be based on evidence of need and tested for viability.
- 3.111 Through including such wording, the policy is able to adapt to changing housing needs and further ensure the correct housing mix and type is applied to new developments.

HO 2 - SHOULD THE HOUSING MIX AND TYPE AND SPECIALIST HOUSING BE DELIVERED THROUGH A PERCENTAGE POLICY APPROACH THAT SETS REQUIREMENTS FOR EACH CATEGORY OF HOUSING?

- 3.112 No, the policy should not apply explicit percentages, as this would conflict with the flexible approach described and justified under HO 1. However, a range of percentages (e.g. 5-10%) would provide developers with clear expectations whilst allowing for development to account for individual site needs and constraints.
- 3.113 Should a percentage approach be adopted, it is likely that the Council will be forced to accommodate departures from policy in order to enable the necessary development in line with local housing needs. A flexible approach also requiring consideration against the Housing Needs Assessment (or any such later document) would enable sites to more accurately meet local market demands and respond to updated assessments in real time.

HO 6 - DO YOU AGREE WITH THE SUGGESTED POLICY APPROACH FOR RESIDENTIAL DEVELOPMENT PROPOSALS, AS SET OUT IN HO 3 'PROPOSALS FOR RESIDENTIAL DEVELOPMENT' ABOVE? IF NOT, PLEASE SUGGEST HOW IT COULD BE AMENDED?

- 3.114 Yes, we agree with the proposed approach to residential development, in particular the retention of DM19. It may be useful to amend the policy in order to account for the 'Golden Rules' as set out by the NPPF in relation to development in the grey belt.
- 3.115 The amount of affordable housing a scheme can provide depends on the overall viability of a project and a flexible approach is needed to take account of the circumstances of individual schemes. The approach should be justified by up-to-date evidence of need and viability tested as deliverability should not be compromised by over ambitious requirements.
- 3.116 The Council should identify the areas where affordable housing is most needed and take a flexible approach where need is greatest to ensure delivery is achieved wherever feasible.

Health and Wellbeing

HW 3 - SHOULD WE CONSIDER REVIEWING THE SEPARATION DISTANCES BETWEEN FACING WINDOWS OF MAIN HABITABLE ROOMS, AS SET OUT IN CURRENT LOCAL PLAN (PART TWO) POLICY DM 2 IMPACT ON RESIDENTIAL AMENITY, AND INCLUDE THEM IN A POLICY IN THE NEW LOCAL PLAN?

- 3.117 Whilst we recognise the importance of separation distances in order to protect residential amenity and prevent overlooking, we believe that this would better be served as part of a design guide or supplementary guidance document (SPD).
- 3.118 An SPD would enable the LPA to review appropriate separation distances across a range of locations and types of development, in order to respond to individual needs across the district.

HW 4 - WHAT IS AN APPROPRIATE QUANTITY OF OUTDOOR AMENITY SPACE TO BE PROVIDED IN NEW DEVELOPMENT? WHAT APPROACH SHOULD WE APPLY TO APARTMENTS/FLATS?

- 3.119 It is essential that new developments, particularly major developments, provide an appropriate level outdoor amenity space, or public open space. As with HW 3, this is something that could be progressed in detail within an outdoor amenity and open space SPD, establishing thresholds, requirements and exceptions for outdoor amenity and open space within new developments.
- 3.120 This may include garden sizes, POS thresholds and play requirements.

Open Space

OS 1 - DO YOU AGREE WITH THE SUGGESTED POLICY APPROACH TOWARD OPEN SPACE, SPORT AND RECREATION, AS SET OUT IN OS 1 'OPEN SPACE, SPORT AND RECREATION' ABOVE? IF NOT, PLEASE SUGGEST HOW IT COULD BE AMENDED?

- 3.121 The proposed approach requires major residential development to include provision of open space, sport and recreation in accordance with current policy DM35, and for contributions to be required for playing pitches based on additional demand.
- 3.122 The policy will also follow a space hierarchy of: on-site, off-site, financial contribution.

- 3.123 We agree with the policy approach to protect, manage and enhance open spaces, sport and recreational facilities, and agree with the spatial hierarchy. However, protection must be balanced with meeting housing needs. Releasing carefully chosen Green Belt land along the urban edge of Chester, such as at the Mannings Lane site, provides an opportunity to secure new and enhanced open space and recreation provision as part of a comprehensive development and provide more direct access to sport and recreation facilities to the benefit of the wider area.
- 3.124 However, the required provisions (in line with DM35) must be reviewed and updated in accordance with a new Open Space Assessment. The most recent assessment was undertaken in 2016, covering the period to 2030. As such, the assessment does not reflect the current position, and the emerging plan will extend well over the current period.
- 3.125 As such, the evidence base should be updated, and policy requirements reflected.

OS 3 - IS THE CURRENT EVIDENCE SUFFICIENT OR DOES IT REQUIRE UPDATING (OPEN SPACE STUDY AND PLAYING PITCH STRATEGY)?

- 3.126 As previously noted, the Open Space Study requires updating to inform the required provision of open space for new development. This approach is set out under NPPF Paragraph 103 whereby it is clearly set out that Planning policies should be based on robust and **up to date** (NJL Emphasis) assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from these assessments should then be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.
- 3.127 The Playing Pitch Strategy was updated in February 2025 and as such is considered appropriate to inform the emerging Local Plan.

Green Infrastructure

GI 1 - DO YOU AGREE WITH THE SUGGESTED POLICY APPROACH TOWARDS GREEN INFRASTRUCTURE, BIODIVERSITY AND GEODIVERSITY, AS SET OUT IN GI 1 'GREEN INFRASTRUCTURE, BIODIVERSITY AND GEODIVERSITY' ABOVE? IF NOT, PLEASE SUGGEST HOW IT COULD BE AMENDED?

- 3.128 The proposed approach is supported, in so far as it would protect and enhance green infrastructure, biodiversity and geodiversity.
- 3.129 However, the LNRS proposed Hedgerow section should include 'where possible' with regards to external hedgerow. Hedgerow boundaries may not be appropriate for a number of reasons, and so the policy must be designed to allow for flexibility where necessary.

GI 2 - SHOULD NEW DEVELOPMENT CONTRIBUTE TO WOODLAND IN CHESHIRE WEST AND CHESTER? IS A 2:1 TREE REPLACEMENT RATIO ENOUGH FOR A TREE REPLACEMENT POLICY?

- 3.130 The ambition to increase tree cover within the district is supported, and where sites form part of woodland, it is reasonable to require developments to contribute to the maintenance/enhancement elsewhere if this is to be lost.
- 3.131 The 2:1 tree replacement policy is supported as a reasonable and realistic measure.

GI 3 - SHOULD NEW LOCAL PLAN POLICY GO ABOVE THE 10% MANDATORY BIODIVERSITY NET GAIN SET NATIONALLY?

- 3.132 The Environment Bill set out to require a 10% net gain as a significant benefit to the protection and enhancement of development sites and where not possible on site, land banks across the country.
- 3.133 Achieving a 10% net gain requires significant investment as well as land to deliver required habitat units. An uplift from this baseline figure will result in further development requiring expensive off-site units, which could impact on viability and other essential developer contributions (such as affordable housing) will be lost.
- 3.134 As such, the 10% net gain should not be exceeded.

4. Conclusions

- 4.1 These representations, submitted on behalf of Miller Developments, comment primarily on the suitability of the suggested growth areas associated with their site of Mannings Lane, Chester. Comments are provided specific to other key themes within the Issues & Options document.
- 4.2 In summary, we feel the emerging Plan must consider the following:
- Ensuring the housing distribution correlates with need and is not distributed unevenly.
 - The emerging Local Plan should look to provide more than the minimum housing need to ensure growth potential is maximised within CW&C.
 - Employment growth is met in full within each Local Authority area.
 - The two key themes of employment growth and housing are considered in conjunction to ensure economic growth is not restricted and that housing is provided to accommodate growth expected.
 - In consideration of the above, suitable housing allocations should be provided particular emphasis must be placed on providing more homes in Chester due to the large housing need.
- 4.3 Therefore, the Council must ensure suitable housing sites are allocated to help meet the growth expected in this area of CW&C, with the site which is the basis of this representation as one potential example.
- 4.4 The Mannings Lane site is sustainably located and no technical constraints exist to prevent delivery of the site. It is suitable for housing and is in line with the growth strategy of CW&C.
- 4.5 We trust this document is considered as part of the Local Plan preparation and we welcome the opportunity to discuss any of the content within this representation note (both in regard to the suggested growth areas, or general comments regarding the Issues & Options document) to help CW&C produce a sound Local Plan.

This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party. Any such party relies on this report at their own risk.

© Report copyright of NJL Consulting

www.njlconsulting.co.uk