

Cheshire West & Chester Local Plan

Representations on Issues & Options

Land at Manor Farm and adjacent Land at the Rake & Pikel Pub, Christleton

Date of report: August 2025

PREPARED FOR



savills

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Document History

Issue	Date	Issued by	Comment
1.0	21.08.2025	JA	First Draft for Review
2.0	26.08.2025	JA	Draft for Client Review

1. Introduction

- 1.1 Savills (UK) Limited (Savills) is instructed by Northern Trust Land Limited (Northern Trust) to submit representations on the Issues and Options (Regulation 18) draft of the Cheshire West and Chester Council Local Plan (New Local Plan).
- 1.2 The current Local Plan for Cheshire West and Chester (CW&C) comprises 2 parts. Part 1 sets out the strategic policies, including the housing requirement, spatial strategy, and strategic designations. This was adopted in January 2015. Part 2 sets out land allocations and detailed development management policies. These are based on the strategic framework set by Part 1. Part 2 was adopted in July 2019.
- 1.3 The Council has resolved to begin the preparation of a New Local Plan which will, upon adoption, supersede both parts of the current Local Plan.
- 1.4 The Issues and Options draft represents the first publication on the New Local Plan and the first opportunities for interested parties to comment. It is supported by Background Papers on a number of settlements within the District as well as background data on settlements.
- 1.5 At the heart of the National Planning Policy Framework (NPPF) is the Presumption in Favour of Sustainable Development (Paragraph 11), which requires plans to meet the development needs of their area and sets out requirements for strategic policies.
- 1.6 These representations will focus on ensuring that the new Local Plan is drafted in accordance with the criterion set out in the NPPF and associated guidance within Planning Practice Guidance (PPG).
- 1.7 The interests of Northern Trust are set out in Section 2, however, for clarity it is seeking to promote approximately 12.4 hectares (30.7 acres) of land at Manor Farm and land adjacent at the Rake & Pikel Pub, Christleton ('the Site') for residential development. It is estimated that the site can accommodate in the region of 250 – 300 homes.
- 1.8 A Location Plan is provided at **Appendix A**, with a Development Framework plan at **Appendix B**. At **Appendix C** a Transport Note is appended from Curtins.
- 1.9 The representations will be structured as follows:
 - Section 2 – Background to Northern Trust and the Site
 - Section 3 – Representations on the CW&C Local Plan Issues & Options
 - Section 4 – Summary and Conclusions

2. Background to Northern Trust and the Site

Northern Trust

- 2.1 Northern Trust is a family-owned property investment and development company based in Lancashire. The company has a track record of working with Local Authorities to regenerate sites and promote strategic land for housing and commercial development.
- 2.2 Over the last two years, the strategic land arm of Northern Trust has secured planning permission for around 4,500 new homes. The company currently manages and controls more than 50 sites, with potential to bring forward more than 10,000 homes.
- 2.3 Northern Trust has an established record of working closely with landowners, developers, Councils and communities to deliver sustainable development in the UK.
- 2.4 In CW&C specifically, Northern Trust is promoting other land at Neston and Davenham for residential development. Representations are submitted separately in relation to those locations. This demonstrates Northern Trust's commitment to delivering homes to meet the identified needs for housing in the District.

The Site

- 2.5 This representation relates to approximately 12.4 hectares (30.7 acres) of land situated to the west of Christleton. The Site is indicated in yellow on Figure 1 below.

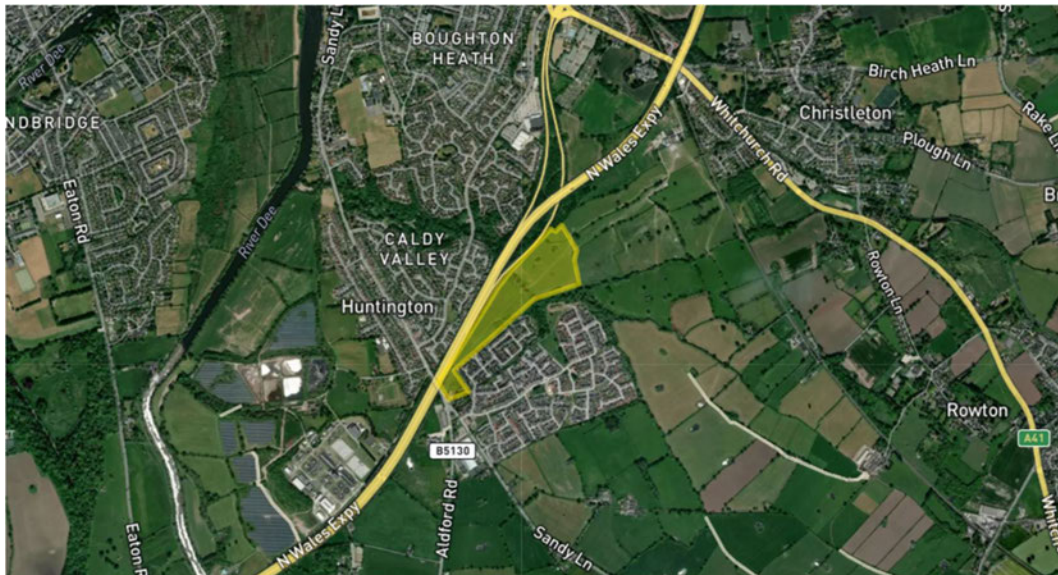


Figure 1 – Location Plan

- 2.6 The Site is bound to the north by the North Wales Expressway (A55) and slip road. To the south west, the Site is bound by Chester Road and a roundabout with Sandy Lane and Aldford Road. To the south the Site boundary is formed by the Caldly Brook and residential properties fronting

Crawford Close and Cheshires Way. The eastern boundary is hedgerows with further agricultural land beyond.

- 2.7 The Site is located approximately 1.5 km to the west of Christleton, a highly sought-after village located approximately 2 miles from Chester City Centre. The village benefits from various local services and amenities with excellent access to the A55 and A41, which provide convenient routes to North Wales and the wider national highway network.
- 2.8 The closest railway station is Chester which is situated approximately 2.66 km north west of the Site and provides direct services to Manchester, Crewe and London.
- 2.9 The Site includes the Rake & Pikel Pub and ancillary car park, which falls under the freehold ownership of Northern Trust. For reference, Northern Trust's ownership of the southern part of the Site is indicated in yellow in figure 2 below. Northern Trust has secured a long-term promotion agreement for the remainder of the land as identified in Figure 1 above.

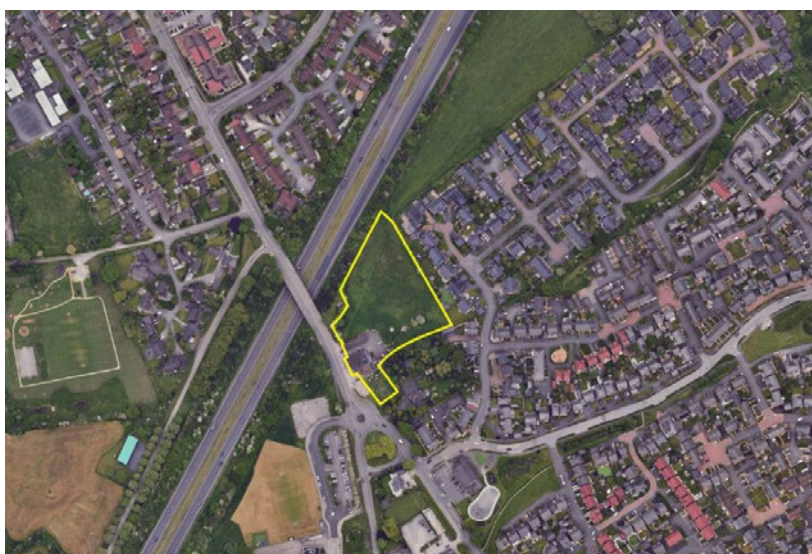


Figure 2 – Adjacent land in the ownership of Northern Trust

- 2.10 To facilitate development of the Site, the Rake & Pikel Pub will remain in situ with access provided via land to the north of the Pub. This will require the demolition of a small outbuilding adjacent to the Pub, however the Pub itself as well as the car park would remain largely unaffected.
- 2.11 Technical due diligence work has been undertaken by specialist highway engineers to demonstrate that an appropriate access for the Site can be achieved using land adjacent of the Pub.
- 2.12 Northern Trust is aware that land to immediately to the east of the Site (part of the Manor Farm landholding) is also being promoted separately as an opportunity for strategic residential development to the South East of Chester.
- 2.13 For clarity, this representation is submitted in relation to the land identified in Figure 1, over which Northern Trust has control. However, Northern Trust is working collaboratively with the adjacent landowner at Manor Farm and as such, proposals can come forward either independently, or as part of a comprehensive masterplan for the wider area.
- 2.14 Accordingly, the Site could be allocated in its own right as part of the new Local Plan, or it could form part of a larger allocation that includes the entire Manor Farm landholding.

- 2.15 In any event, residential development would come forward at this location that is connected to its surroundings and sympathetic to the local characteristics.
- 2.16 For clarity, the Site can come forward independently and does not rely on any additional land to be delivered.
- 2.17 As described above, access to the Site will be provided from the South, using land adjacent to the existing Pub, which will be largely unaffected, save for the removal of an outbuilding.

Site Designations

- 2.18 The Site is subject to the following designations, identified using currently available data.

Table 1 – Site Designations

Designation Type	Commentary
Pluvial Flooding	The Site is located entirely within Flood Zone 1, indicating the lowest risk of flooding from rivers and seas.
Fluvial Flooding	There are some minor pockets of low surface water flood risk along Caldry Brook and to the south of the Site.
Heritage Assets	There are no listed buildings or structures located at the Site or adjacent to it and the Site is not within or adjacent to a Conservation Area.
Landscape	There are no statutory landscape designations present at the Site.
Ecology	There are no statutory ecological designations present at the Site. It is noted that a non-statutory Local Wildlife Site designation covers part of the Site.
Tree Preservation Orders	There is a group Tree Preservation Order (ref: 13/00010/ORD) covering the woodland area in the middle of the Site.
Public Rights of Way	Two Public Rights of Way (Huntingdon FP7 and Christleton FP20) run along the Site boundary to the south and east.

Site Context

- 2.19 The character of the area to the immediate south of the Site is residential, including the recent residential development off Sandy Lane. The existing settlement of Huntington is located to the north of the Site, beyond the North Wales Expressway, giving a predominantly residential character.
- 2.20 The topography of the Site is fairly level apart from the valley formed by Caldry Brook, which runs in an east-west direction across the width of the Site.
- 2.21 The Site is located within the North Cheshire Green Belt, designated under Policy STRAT 9 ('Green Belt and Countryside') of the Local Plan (Part One). A Green Belt assessment is provided below.

Local Wildlife Site

- 2.22 Part of the Site falls within a Local Wildlife Site (LWS) designated area.
- 2.23 The LWS is designated under policy ENV4 of the Local Plan and is therefore a non-statutory designation. The extent of the LWS is identified hatched in green on the plan provided at Figure 3 below.



Figure 3 – Local Wildlife Site Designation

- 2.24 The LWS includes land surrounding the Caldly Brook watercourse where it enters the Site under the A55. It also includes a large part of a field to the immediate southwest of Caldly Brook.
- 2.25 Given the extent of the landholding, future masterplanning will seek to retain as much of the LWS as possible. If any parts of the LWS are to be relocated to facilitate development, the proposals will include a comprehensive mitigation scheme on adjacent land.
- 2.26 Northern Trust is committed to undertaking a full grassland survey in due course to establish the ecological quality of the LWS.
- 2.27 It should also be noted that at present, the LWS is not maintained or managed. As part of the proposals, a detailed management strategy will be prepared which will include the LWS in a full scheme of long-term maintenance and management, offering enhancements to the grassland.

Planning History

- 2.28 In terms of planning applications, there have been no relevant planning applications submitted at the Site in the last five years according to the Council's public access system.
- 2.29 The land has been submitted previously in response to the 2021 'Call for Sites'. The submission included an area of land including the entire Manor Farm Site, as well as adjacent land as identified in Figure 2.
- 2.30 The Site was given the reference EC Site 29 'Land at Manor Farm, Christleton'. It was described in the submission as being 167 acres of land in agricultural use in multiple ownership (known). The proposed use of the site was housing. The ownership of the site is actually within a single family and is under the control of Northern Trust.
- 2.31 An outline of the area previously promoted through the call for sites 2021 is shown in Figure 4 below.

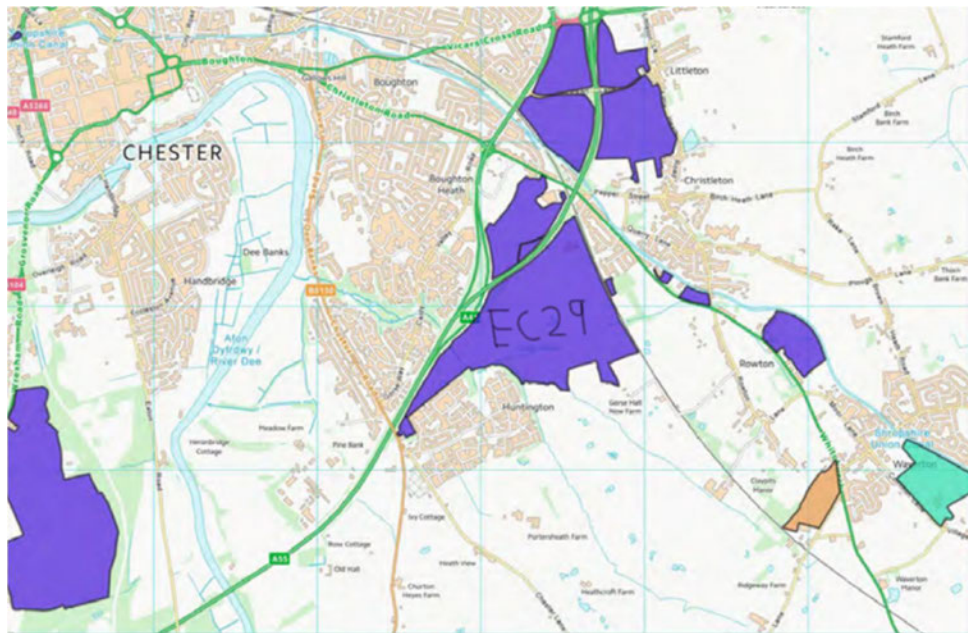


Figure 4 - Extract of Map A0: site suggestions by proposed use (Local Plan Conversation, 2021)

Green Belt Assessment

- 2.32 When identifying land to meet the local requirement for homes, paragraph 147 of the NPPF sets out that local authorities should demonstrate that they have examined fully *‘all other reasonable options for meeting its identified need for development’* before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries. Exceptional circumstances can include where an authority cannot meet its identified need for homes through other means.
- 2.33 It is considered that the Council is unable to meet its housing need on suitable land outside of the Green Belt and as such, exceptional circumstances exist to justify the release of land from the Green Belt.

Green Belt Release Hierarchy

- 2.34 Where it is necessary to release land from the Green Belt for development, the NPPF (at paragraph 148) sets a hierarchy for how Green Belt land should be assessed. The hierarchy is as follows:
 - Previously developed land
 - Grey belt (which is not previously developed)
 - Other Green Belt locations
- 2.35 The same paragraph outlines that when reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site’s location is appropriate.
- 2.36 Savills consider that the Site meets the definition of grey belt and should therefore be considered to be released from the Green Belt on the ‘second tier’ of the hierarchy, before other Green Belt sites are assessed.

Grey Belt Definition

- 2.37 The NPPF defines grey belt 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'.

2.38 As grey belt land, the Site should be given priority to be considered for release from the Green Belt ahead of other locations in the Green Belt that do not qualify as grey belt.

Meeting the Grey Belt Definition

2.39 There are two key tests outlined in the NPPF that should be applied when assessing whether a site meets the definition of grey belt. These are:

1. Does the site 'strongly contribute' to purposes a, b and d of the Green Belt?
2. Do any of the 'Footnote 7' designations present a strong reason for restricting development?

2.40 The two tests are discussed in turn below.

1) The Green Belt Purposes Test

2.41 In the first instance, the performance of the Site is assessed against purposes a, b and d of the Green Belt as stated at paragraph 143 of the NPPF. Table 2 below assesses the site against the 3 relevant purposes of the Green Belt.

Table 2 – Assessment of the Site against Relevant Green Belt Purposes

Green Belt Purpose	Purpose Wording	Site Performance	Commentary
A	To check the unrestricted sprawl of large built-up areas.	None	The Site is located between the North Wales Expressway and an existing residential settlement. As such, development of the Site would not lead to any real or perceived sprawl of large built-up areas.
B	To prevent neighbouring towns merging into one another.	None	While the Site is located between two residential areas, development of the Site would not result in two neighbouring towns merging into one another. The A55 to the north of the Site provides a natural defensible barrier to the merging of settlements.
D	To preserve the setting and special character of historic towns.	None	The Site is to the southeast of Chester, which is a historic City. Chester's status as a City means purpose 'D' does not apply, since it relates to towns only. Likewise, Christleton is a village and therefore purpose 'D' cannot be applied. As such, development of the Site would not affect the special character of any historic town.

2.42 As demonstrated in Table 2 above, the Site does not make a strong contribution to any of the relevant purposes of the Green Belt.

2) *The 'Footnote 7' Test*

- 2.43 Once it is established that the Site meets the grey belt definition in terms of the Green Belt purposes (a, b and d), the next stage in assessing whether a site could qualify as grey belt is whether any of the 'Footnote 7' exclusions apply and would result in a strong reason for restricting development.
- 2.44 Table 3 below lists all of the Footnote 7 designations and confirms that none of these apply to the Site.

Table 3 – NPPF Footnote 7 Designations

Footnote 7 Designation	Commentary
Special Protection Areas, Special Areas of Conservation, Ramsar Sites	There are no Special Protection Areas, Special Areas of Conservation or Ramsar Sites located within the Site or adjacent to it.
Sites of Special Scientific Interest	The Site is not located in proximity to a SSSI.
Local Green Space	The Site is not designated as a Local Green Space.
National Landscape	The Site is not located within or nearby to a National Landscape.
National Park (or within Broads Authority)	The Site is not located within or nearby to a National Park and is not within the Broads Authority.
Heritage Coast	The Site is not located near to a designated Heritage Coast, or any coastline.
Irreplaceable Habitats	There are no known irreplaceable habitats at the Site.
Designated Heritage Asset (and assets of archaeological interest)	There are no designated Heritage Assets at the Site.
Area at risk of flooding or coastal change	The Site is located entirely within Flood Zone 1, which indicates the lowest risk of flooding from rivers and the sea. Furthermore, there is no real world flood risk from surface water.

The 'Golden Rules'

- 2.45 Where land is released from the Green Belt for housing, the NPPF requires (at paragraph 156) that specific contributions (known as 'Golden Rules') should apply. The golden rules relate to higher contributions for affordable housing, improvements to infrastructure and provision of green spaces than would be required for land that is not in the Green Belt.
- 2.46 Development of the Site would constitute the release of land from the Green Belt and therefore the golden rules would apply.
- 2.47 All of the golden rules could be met in the development of the Site, including a minimum of 50% affordable housing, subject to the policy of the New Local Plan, proportion and significant contributions to green spaces and infrastructure. The affordable housing provision would also be subject to viability tests, in accordance with the NPPF.
- 2.48 As part of the development of the Site, sufficient open space will be incorporated as part of a holistic masterplan.

Summary

- 2.49 Our strong view is that the Council is required to release land from the Green Belt in order to ensure a sufficient supply of deliverable housing land is available to meet its housing need in full within the Plan period.
- 2.50 The Site is a logical location for housing in an area that is already predominantly residential in nature.
- 2.51 Since, in our view, the land qualifies as grey belt and is in a sustainable location, it should be given priority by the Council in terms of its release from the Green Belt. This is in accordance with the hierarchy as established in the NPPF.
- 2.52 Development of the Site would meet all of the required Golden Rules, including a significant proportion of affordable housing and the provision of open green space.

Development Framework

- 2.53 In support of this representation, a development framework plan has been prepared to illustrate the opportunities for residential-led development at the Site. It is estimated that the site can accommodate in the region of 250 – 300 homes.
- 2.54 The development framework plan is included in this document at **Appendix B**.
- 2.55 The Framework Plan shows that the Rake & Pikel pub will be retained, with main access to the Site provided via Sandy Lane and links to the wider masterplan to the North. A technical note on access/highways, from Curtins, is included at **Appendix C**.
- 2.56 The Plan retains existing hedgerows and trees wherever possible as well as the Local Wildlife Site.
- 2.57 A cycleway is proposed throughout the centre of the Site which will provide an important active travel corridor and a recreational facility.

3. Representations on the CW&C Local Plan Issues & Options

3.1 This section of the Representations will set out Northern Trust's position in relation to the questions posed in the Issues and Options draft. Where appropriate, reference will be made to the supporting evidence published by the Council.

3.2 It should be noted that answers are only provided to questions pertinent to Northern Trust, its expertise and interests. Questions that are not considered to be relevant are omitted.

Introduction

IN1 - 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?

3.3 The New Local Plan must be based on up to date and robust evidence. The Issues and Options consultation document sets out the following list of additional evidence that is needed to support the new Plan:

- Retail and Town Centres Study (in preparation)
- Strategic Flood Risk Assessment (in preparation)
- Gypsy Traveller Accommodation Assessment (GTAA) (in preparation)
- Housing Needs Assessment (to be prepared)
- Green Belt Study (to be prepared)
- Infrastructure Delivery Plan (to be prepared)
- Strategic Viability Assessment (to be prepared)
- Transport Assessment (to be prepared)
- Land Availability Assessment (in preparation).

3.4 The above list of additional evidence is sufficient to inform the policies of the new Local Plan. Savills is supportive of the production of a Housing Needs Assessment, Land Availability Assessment and Green Belt Study which will inform the policies that relate to housing delivery in the new Local Plan.

3.5 It is not considered that there is additional evidence that is required that is not already in preparation or due to be prepared that would be necessary to support the new Local Plan.

IN3 – Do you have any comments or views on the proposed plan period for the new Local Plan?

3.6 National policy requires that new Local Plans should set policies for 15 years following adoption, as a minimum. It is considered that the New Local Plan period for CW&C should cover a minimum of 20 years, due to the scale of strategic development that is required to meet the current and future needs of the borough and to reflect the ambitious housing delivery targets set by Government.

3.7 A plan period of 20 years would ensure that the Local Plan is able to set the strategic policies to meet the current and future needs of the borough.

3.8 As such, the Local Plan period should be 2025 – 2045.

Vision

VI3 – 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?

- 3.9 CW&C is a large and diverse borough with distinct towns and settlements that each have specific development needs. As such, the Council's approach is supported which will establish concise visions for the key settlements, in addition to an overarching vision for the whole District.
- 3.10 Local visions for each of the larger settlements (Chester, Ellesmere Port, Northwich, Winsford, Frodsham, Neston and Parkgate) will help to ensure that the specific development objectives of each settlement can be met through the Local Plan policies, which will in turn inform development proposals.

Spatial Strategy

SS1 - Is there any reason for the Council not to plan for delivering a minimum of 1,914 new homes each year?

- 3.11 The Issues and Options draft sets out that the Council's policy approach is to deliver a minimum of 1,914 new homes each year over the plan period, which would equate to 28,710 new homes.
- 3.12 It is noted that the most recent local housing need figure for CW&C is actually 1,928 dpa, which brings the overall 15 year total to 28,920 homes.
- 3.13 In response to question SS1, the new Local Plan should support the delivery of 1,928 homes per year as a minimum. The requirement for the new Local Plan to meet the standard method figure is clearly established in the NPPF and is the necessary approach that must be taken to ensure that the plan is consistent with national policy.
- 3.14 Emphasis is placed on the fact that the national policy requirement is for Local Plans to adopt the standard method figure **as a minimum**. Savills recommends that the Council should take an ambitious approach and aim to exceed the minimum housing delivery indicated by the standard method, in order to support sustainable growth.
- 3.15 National policy provides that in some cases, authorities will be able to justify a lower housing requirement than the standard method on the basis of local constraints on land and delivery (for example designations such as National Parks etc). Such circumstances do not exist in CW&C that would justify a reduced housing requirement. For example, there are no statutory National Parks in the borough.

SS2 - Do you think the Council should consider a stepped housing requirement that plans for a lower level of housing delivery earlier in the plan period?

- 3.16 The NPPF is clear that authorities are required to set strategic policies to meet their housing need in full across the plan period. To support the Government's objective to significantly boost the supply of homes, it is important that 'a sufficient amount and variety of land can come forward where it is needed'.
- 3.17 Paragraph 70(b) of the NPPF states that to ensure land is allocated for housing in a way that boosts the supply of homes, plans should allocate 'a range of sites by size, type and location to meet the housing requirements of different groups in the community'.
- 3.18 A stepped housing requirement with reduced delivery in the early parts of the Plan period would, in effect, allow the Council to defer its full housing delivery to later phases of the Plan period. In areas

where there are existing acute housing shortages, such as Chester, this would prolong existing issues surrounding access to housing.

- 3.19 A stepped requirement would also ignore the opportunities for development sites that are immediately deliverable at the initial phases of the Plan period. Reduced targets in the early stages of the Plan period would risk slowing momentum, which conflicts with national housing objectives of boosting housing growth. As such, it is considered that the housing requirement should be clear and consistent throughout the Plan period, which would encourage market confidence and have a positive impact on overall housing delivery.
- 3.20 Finally, the adoption of a stepped requirement would mean that the New Local Plan would have a more limited contribution to the Government's stated aim of delivering 1.5 million homes during the current Parliament.
- 3.21 For these reasons, the New Local Plan should not utilise a stepped requirement.

SS 4 - Do you agree with the suggested policy approach towards the spatial strategy principles, as set out in SS 3 'Spatial strategy principles' above? If not please suggest how it could be amended?

- 3.22 The Issues and Options consultation document sets out that the spatial strategy will follow the principle of directing new development and allocating land towards previously developed ('brownfield') sites within settlements first. It is acknowledged that previously developed sites within settlements are often the most sustainable locations to support new development, therefore development should be directed to these locations in the first instance.
- 3.23 However, it should be noted that not all brownfield land can be considered deliverable or reasonable alternatives to undeveloped sites. A detailed consideration of the deliverability and availability of each brownfield opportunity will be required to inform the urban capacity of the District.
- 3.24 The spatial strategy principles state that where there are not enough opportunities for redevelopment within urban areas and towns, the approach will be to direct development to the edge of existing settlements in locations with the best access to public transport, services and infrastructure, as the next best sustainable option. The document also states that depending on the settlement, this may require the release of land that is currently designated as Green Belt.
- 3.25 The principles of the spatial strategy as set out in the consultation document are broadly supported. It is a fundamental purpose of the Local Plan to ensure that the development needs of the District are met and that development is directed to the most appropriate and sustainable locations.
- 3.26 While a brownfield-first approach is supported and is consistent with national policy, the scale of development that is required in CW&C (i.e. at least 1,928 new homes per year), and the relative lack of appropriate previously developed sites, means it will be essential for development to be directed to other sites in sustainable locations on the edge of existing settlements. This will necessitate the release of land from the Green Belt.

SS5 - Do you agree with the suggested policy approach towards the settlement hierarchy, as set out in SS 4 'Settlement hierarchy' above? If not please suggest how it could be amended?

- 3.27 The Issues and Options document proposes that the New Local Plan will set out a settlement hierarchy based on the status and role of each settlement. The proposed settlement hierarchy is as follows:
- City – Chester
 - Main Towns – Ellesmere Port, Northwich, Winsford
 - Market Towns – Neston and Parkgate, Frodsham

- 3.28 Savills agrees with the suggested settlement hierarchy as set out above. Chester is the only City within the borough and therefore performs a principle function and should be placed at the top of the settlement hierarchy.
- 3.29 Chester was allocated the largest amount of housing in the current Local Plan. It therefore follows that it will see a greater proportion of housing attributed to it in the New Local Plan. To sustain Chester's status as a principle City in the District, it should be attributed the highest proportion of housing of any settlement in the Borough which will contribute to continued sustainable growth.
- 3.30 Notwithstanding its position at the top of the proposed settlement hierarchy, Chester is arguably the most constrained of the settlements on the hierarchy, partly owing to the surrounding Green Belt as well as the Welsh border to the west and area of flood risk to the north. Accordingly, any settlement extensions, will likely need to be directed to the south, south east and south west of Chester. This includes the Site, which would make a significant contribution to the housing requirement in Chester in a logical location
- 3.31 The consultation document sets out that the New Local Plan will include individual place-based policies for each settlement which will set out the vision, core features, key issues and clear strategy for what development will take place in each settlement. The placed-based policy is supported in principle as this will add clarity in terms of the expectations of the Council for each settlement area.
- SS11 - Please select the option which is the most appropriate spatial strategy for Cheshire West and Chester:*
- 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*
- d. None of these*
- 3.32 The most appropriate spatial strategies for CW&C are Options B and C above. To ensure the Local Plan is ambitious and plans to deliver sufficient housing, in accordance with national policy, Option A should be discounted, as retaining the current Green Belt would restrict realistic opportunities to deliver sustainable development in appropriate locations in the Borough.
- 3.33 In order to deliver at least 1,928 new homes per year, the Council will need to assess land that is currently within the Green Belt for its potential to deliver sustainable residential development.
- 3.34 While the prioritisation of previously developed land for housing development is acknowledged, the Council cannot identify a sufficient supply of available and suitable previously developed land in urban areas that is capable of accommodating the housing requirement. As such, land in the Green Belt must be considered in order to ensure CW&C addresses its local housing need within the Plan period.
- SS14 - Do you feel that Option A is an appropriate spatial strategy for the new Local Plan?*
- 3.35 Option A is not considered to be an appropriate spatial strategy for the New Local Plan. The reason being is that the Council is required to meet its local housing requirement in full (being 1,928 homes per annum) as a minimum, and in order to fulfil its role in setting strategic policies to meet this requirement, the New Local Plan will be required to allocate sufficient land for housing development.
- 3.36 It is considered that Option A would restrict opportunities for sustainable residential development on the edge of existing settlements that are currently within the Green Belt. It is problematic as it would serve to restrict the growth of some of the most sustainable settlements and result in a pattern of development that is less sustainable.

- 3.37 There is not a sufficient supply of reasonable previously developed land that is suitable and available for housing in CW&C and as such, Green Belt sites must be assessed for their contribution to housing delivery, in accordance with the NPPF.

SS16 - Do you feel that Option B is an appropriate spatial strategy for the new Local Plan?

- 3.38 Option B follows the existing Local Plan strategy and settlement hierarchy which is set out in Policy STRAT 2 of the Local Plan (Part One). That policy locates most new development in or on the edge of 'main urban areas' and an appropriate proportion of new development on smaller settlements which have adequate services, facilities and transport connections.

- 3.39 The Issues and Options consultation document makes clear that a key difference between the adopted Local Plan (Part One) and the New Local Plan is that the current supply of previously developed land that can accommodate new development is much more limited, meaning larger areas of Green Belt and/or sites designated as Countryside are likely to be needed. The explanatory text on Option B explains that, while a proportion of development can be accommodated within existing settlements, '*much of the new development under this option would need to be located within the Green Belt and/or Countryside*'.

- 3.40 The approach set out under Option B is an appropriate spatial strategy that is entirely consistent with national policy and seeks to bring the adopted Local Plan policy up to date in respect of the spatial strategy. Option B would ensure that new development is directed to the most sustainable and logical locations in the District, which follows the established strategy in the adopted Local Plan (Part One).

SS18 - Do you feel that Option C is an appropriate spatial strategy for the new Local Plan?

- 3.41 Option C seeks to direct residential development to settlements that are served by the rail network and main bus route corridors. This strategy maximises opportunities for sustainable travel choices and could support further improvements to existing public transport services through development.

- 3.42 This Option would require land to be released from the Green Belt in locations that are well-connected by existing transport corridors.

- 3.43 Option C is a logical approach to the spatial strategy that aims to take advantage of existing settlements that are on the railway network or bus routes, as such the Option is considered to be appropriate for the New Local Plan. Strategic-scale Green Belt release around Chester should be considered under this Option.

- 3.44 However, the extent of development should still be guided by the level of day to day services that are available in the settlements.

SS21 - What information should we take into account when assessing sites for allocation in the new Local Plan?

- 3.45 At Paragraph 72, the NPPF makes clear that planning policies should identify '*a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability*'. To ensure the New Local Plan is consistent with the NPPF, it is critical that the Council takes into consideration the availability, suitability and economic viability of proposed housing allocation sites.

- 3.46 In terms of availability, the Council should consider the ownership of proposed sites and whether sites can feasibly come forward within the Plan period. In the case of the Site at Manor Farm, Christleton, the land is clearly available, since it is under the control of Northern Trust. As such, there are no land assembly or ownership constraints that could pose a delay to development of the land. It is in Northern Trust's interest to secure planning permission and implement the development as soon as possible, should the Site benefit from a residential allocation in the New Local Plan.

3.47 In terms of suitability, it is important for the Council to consider the sustainability of proposed allocation sites, in accordance with its policy approach at Policy TA 1. This includes assessing existing provision of public transport services and proximity to settlements and local centres. Locations that are detached from existing settlements or poorly connected to public transport are not sustainable, and therefore are unlikely to be suitable for residential development within the new Plan period.

3.48 The Site at Manor Farm, Christleton is in a sustainable location in close proximity to Chester and the desirable village of Christleton. The Site is a sustainable location that is suitable for residential development and would make a significant contribution to meeting the identified need for a variety of housing in CW&C.

3.49 When assessing sites for potential allocations, it will be important for the Council to ensure that allocated sites can realistically be delivered within the Plan period. As such, factors affecting deliverability of potential housing sites will be a key consideration, so technical constraints, such as ecology, flood risk and topography should all be taken into account when the Council assesses sites for potential allocations.

SS23 – Which of the identified potential growth areas around Chester do you consider to be the most suitable?

3.50 Map 5.4 of the Issues and Options document identified four potential growth areas around Chester. All four of the growth areas are within the current Green Belt. CH01 is beyond the north of Chester and is identified as an opportunity for mixed use development. CH02 is a strip of land along the eastern side of Chester's settlement boundary and is identified for housing development. CH03 and CH04 are located beyond the south east and north east of the settlement boundary respectively and are both identified for housing growth.

SS24 – Do you have any further comments about any of the potential growth areas identified around Chester?

3.51 It is considered that potential growth area CH02 should be expanded to include land to its south, namely land at Manor Farm, Christleton and the Site.

3.52 The land at Manor Farm is an excellent opportunity adjacent to the potential growth area CH02 and Christleton that can readily deliver sustainable housing development and make a substantial contribution to meeting the District's local housing need.

3.53 The Site would make a logical extension to the potential growth area, where it meets the existing settlement boundary surrounding the residential development off Sandy Lane, known as Saughton. The Manor Farm land is in a highly sought after location nearby to the village of Christleton. As such, it is a prime location for residential development that would be in keeping with the local vernacular and predominantly residential surroundings.

SS25 – Are there any constraints, including infrastructure provision, that should be considered for Chester when developing the new Local Plan?

3.54 There are no known constraints, including those related to the provision of infrastructure that would provide an insurmountable constraint to development of land at Manor Farm. The Site is demonstrably deliverable and can deliver a substantial number of homes that are required around Chester.

3.55 There are no other constraints pertinent to the Site at Manor Farm that could not be adequately addressed through the planning application process.

Chester

CH1 – 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?

- 3.56 The policy approach towards Chester is set out at section CH1 of the Issues and Options Draft. The suggested policy approach will reflect the One City Plan to recognise the uniqueness of the City and the opportunity to build on its cultural and heritage offer. The policy approach will support Chester’s role as a sub-regional centre.
- 3.57 Savills is broadly supportive of the policy approach towards supporting the opportunities for growth in Chester. Chester is a principle town in the District and accordingly, it should be attributed with the highest proportion of housing delivery, as it has done for the current Local Plan.
- 3.58 A fundamental role of the New Local Plan is to ensure sufficient land is identified in the District to meet the local housing need in full within the Plan period. There is significant opportunity to support sustainable growth in Chester by facilitating sustainable residential development and this opportunity should be reflected in the New Plan.

CH2 – Do you have any comments on the suggested allocations/sites above?

- 3.59 Land at Manor Farm, Christleton is promoted for inclusion in the New Local Plan as an allocation for housing. As described above, the Site is in a highly sustainable location nearby to the village of Christleton and close to existing transport links with frequent services to Chester.
- 3.60 The Site is available for development and there are no insurmountable constraints to development. As such, the Site can make a substantial contribution to addressing the local housing need.

CH4 – Are there any infrastructure requirements required to support the suggested policy approach set out in CH1 ‘Chester’ above?

- 3.61 As part of the development of the Site, necessary infrastructure that is required to serve the residential development will be delivered, such as access, drainage and other utilities.
- 3.62 There are no other known infrastructure requirements required to support the suggested policy approach to Chester.

Transport and Accessibility

TA1 - Do you agree with the suggested policy approach towards transport and accessibility, as set out above in TA 1 ‘Transport and accessibility’? If not please suggest how it could be amended?

- 3.63 The Issues and Options consultation draft sets out that the Councils overall approach to transport is to minimise the need for travel, particularly by single-occupancy cars and vans, by locating development so it is accessible to local services and facilities by a range of transport modes. The draft document sets out a sustainable transport hierarchy, which is as follows:
- People walking or wheeling
 - People cycling or riding
 - People using public Transport
 - People driving ultra-low emission and shared vehicles
 - Delivery and logistics in internal combustion engine vehicles
 - People driving other private motor vehicles.
- 3.64 In terms of new development, the draft Local Plan document sets out that new development will be encourages in more sustainable locations. This means that developments should maximise opportunities for people to be able to meet day-to-day needs within a reasonable (10 minute/ 800 metre) walking distance of their homes, as well as being able to travel outside of their settlements by a range of sustainable transport choices.

- 3.65 In response to question TA 1, the Council's suggested policy approach towards transport and accessibility is broadly supported. The element of the draft policy that encourages new development in sustainable locations that benefit from existing connections to sustainable transport modes is particularly supported, since these locations can make a significant contribution to sustainable development.
- 3.66 The land at Manor Farm, Christleton is in a sustainable location that is consistent with the key principles of the draft policy TA 1.

Infrastructure and Developer Contributions

ID1 - Do you agree with the suggested policy approach towards infrastructure and developer contributions, as set out above in ID 1 'Infrastructure and developer contributions'? If not please suggest how it could be amended.

- 3.67 The NPPF states at Paragraph 35 that Plans should set out the contributions expected from development. At the same paragraph, the NPPF makes clear that such policies should not undermine the deliverability of the plan.
- 3.68 Savills broadly supports the proposed infrastructure and developer contributions policy under section ID1. However, the Issues and Options draft states that the policy approach will clarify that where infrastructure is needed to sustain a new development, off-site contributions may not be acceptable. This approach is questioned as it could fail to take due consideration of smaller sites that are constrained and therefore may not be able to deliver necessary infrastructure on-site. In these circumstances, off site contributions are a way of mitigating the impacts of development through financial contributions, established under a legal agreement tied to a planning permission.

ID2 - Should developer contributions only apply to major developments? How should 'major development' be defined?

- 3.69 Developer contributions should only apply to major developments. It is suggested that the definition of 'major development' should be consistent with the definition given in the NPPF, as this will aid clarity and consistency between local and national policy.
- 3.70 The NPPF explicitly states that for housing, major development relates to development where ten or more homes will be provided, or the Site has an area of 0.5 hectares or more.

ID3 - Do you agree that developers/ operators should pay the full cost of infrastructure required to deliver their sites?

- 3.71 In the case of housing development, financial contributions can be secured by Section 106 agreements in order to enable to provision of new site specific infrastructure, or upgrade existing site specific infrastructure, required to make development acceptable in planning terms.
- 3.72 These contributions are supplemented by CIL contributions towards non-site specific infrastructure. In this sense, housebuilders already pay the full cost of the infrastructure required to deliver new homes.

ID4 - In the event of viability being an issue how could the new Local Plan prioritise the provision of infrastructure across the borough and/ or on a settlement-by-settlement basis?

- 3.73 It is considered that site specific infrastructure that is essential for delivery should be prioritised. This may require a reduction in affordable housing contributions, or flexibility in affordable tenure mix, to enable this to happen.

Housing

HO1 - Do you agree with the suggested policy approach towards mix and type and specialist housing in new developments, as set out in HO 1 'Mix and type of housing in new developments and specialist housing' above? If not please suggest how it could be amended?

3.74 The Issues and Options draft document states that the new policy approach will provide detailed requirements for various types and proportions of housing. It is important that the New Local Plan is not overly restrictive as it must allow flexibility to enable sites to come forward that can deliver a range of house sizes in different proportions that reflect both need and market demand.

3.75 Until the Housing Needs Assessment is updated, comments cannot be made in relation to the housing mix policy details. In terms of specialist and accessible housing (M4(2) / M4(3) the proportion of homes that meet these standards should reflect the evidence. This is not likely to require that all homes meet these standards as a blanket requirement

HO2 - Should the housing mix and type and specialist housing be delivered through a percentage policy approach that sets requirements for each category of housing?

3.76 It is important that the policy approach to housing mix taken in the New Local Plan provides for a mix of different types and sizes of housing to come forward to meet the diverse housing needs of the District. It is appropriate that the housing mix policy should be informed by an up to date Housing Needs Assessment. Until that Assessment is complete, comments on the details of the policy cannot be made.

3.77 A percentage policy approach would appear to be a logical approach. However, such percentages would need to be reflective of a robust evidence base.

3.78 It should be noted however that policies in the New Local Plan must take a flexible approach that takes into consideration site-specific factors. There should be flexibility built into the policy to not restrict housing development from coming forward where sites can make an important contribution to the overall housing delivery in the Borough.

HO4 - Do you agree with the suggested policy approach towards delivering affordable housing, as set out in HO 2 'Delivering affordable housing' above? If not please suggest how it could be amended?

3.79 The draft Issues and Options document sets out the policy approach to be taken in the New Local Plan in relation to affordable housing at section HO2. The approach will reflect the government's requirement for housing development in the Green Belt to provide at least 50% affordable housing, whether land has been released from the Green Belt through a housing allocation, or an application.

3.80 Affordable housing will be required on all sites of 10 or more dwellings apart from in designated rural areas, where the threshold will be three or more dwellings.

3.81 The general policy approach towards securing affordable housing is supported in principle. As above, it is important that the detailed policy includes sufficient flexibility and takes into consideration site specific factors, such as ground contamination, that could impact viability.

3.82 The Council should take a pragmatic approach that enables a sufficient supply of affordable housing to come forward as part of housing developments, while taking into account the potential for viability challenges on some sites which may influence the provision of affordable housing.

3.83 This is particularly the case in terms of affordable housing tenures with an increased percentage of affordable home ownership and intermediate tenures, particularly where the golden rules in relation to Green Belt release apply.

Health and Wellbeing

HW1 - Do you agree with the suggested policy approach towards health and wellbeing, as set out in HW1 'Health and wellbeing' above? If not, please suggest how it could be amended?

- 3.84 High quality developments can make a positive impact on health and wellbeing. Likewise, developments that are poor quality can give rise to adverse impacts on health and quality of life.
- 3.85 The Issues and Options draft sets out the Council's policy approach to health and wellbeing and confirms that where it is considered likely that a proposal will result in significant environmental effects during the construction phase, a Construction Environmental Management Plan (CEMP) will be required.
- 3.86 The document states that proposals should aim to promote access to green space across the borough that widen and strengthen the boroughs cultural, sport, recreation and leisure offer.
- 3.87 The Council's approach to health and wellbeing is supported.

HW3 - 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?

- 3.88 In response to question HW3, while the importance of providing high quality residential amenity is supported, it is important that any policy that prescribes separation distances allows flexibility to consider site-specific factors.
- 3.89 Rigid design standards, such as separation distances, can limit site capacity and reduce density. Local variations in separation distance policies also create uncertainty and inconsistency for developers.
- 3.90 As such, any design policy, including those related to separation distances should include flexibility to ensure development is context-specific while ensuring a high standard of residential amenity.

HW4 - What is an appropriate quantity of outdoor amenity space to be provided in new developments? What approach should we apply to apartments/flats?

- 3.91 The New Local Plan should set out a recommended quantity for outdoor amenity space, however it is important that the relevant policy takes due consideration of other existing and future outdoor amenity spaces that are accessible.
- 3.92 Any proposed policy should therefore take into account existing parks, playgrounds and other open spaces nearby to new developments, which can provide an important source of outdoor amenity space.

Open Space, Sport, Recreation and Community Facilities

OS1 - Do you agree with the suggested policy approach towards 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?

- 3.93 The Issues and Options consultation document sets out the Council's policy approach to open space, sport and recreation. The broad approach aims to protect, manage and enhance existing open spaces and facilities. This policy approach is broadly supported and is consistent with the NPPF.
- 3.94 The draft policy text states that open space provision in new developments should be sought in the following order: on site, off-site, as a financial contribution. It is important that any policy takes into

account new development on sites that cannot accommodate open space provision onsite, and in these circumstances, off-site provision or financial contributions are reasonable alternatives.

- 3.95 In terms of recreational routeways, the draft policy wording states that proposals that enhance public access and the recreation value of the recreational routeway network will be supported. Savills support this element of the policy and that the routeway network will be identified on the policies map. However it will be important that the routeway policy is applied in a flexible manner insofar that it does not prohibit sustainable residential development from being delivered.

OS2 - Are the current thresholds for developer contributions for open space and playing pitches suitable, or do you have any comments or suggestions for what they should be?

- 3.96 The thresholds for developer contributions for open space are detailed in the CW&C Council Developer Contributions Technical Guidance Note. That document sets out the onsite and financial contributions required for 'amenity greenspace', 'play children', play youth', 'allotment', 'parks and recreation' depending on the proposed number of residential units.

- 3.97 For proposed developments of 10 or fewer units, no contributions are due, which is an appropriate policy approach. For proposed developments of more than 10 units, there are various onsite and off-site requirements depending on the size of the proposals.

- 3.98 The broad approach is supported, however it is important that the policy is applied with sufficient flexibility to enable homes to come forward in sustainable locations. The importance of providing physical and financial contributions to open recreational spaces is acknowledged, however the scale of housing need in CW&C is such that the policy must take a pragmatic approach and prioritise sustainable housing delivery.

OS3 - Is the current evidence sufficient or does it require updating (Open Space Study and Playing Pitch Strategy)?

- 3.99 The Council's Playing Pitch Strategy (PPS) was originally produced in 2021 and has since been updated in February 2025. A PPS is said to have a lifespan of three years, although this can be increased if it is kept up to date. Since it has been updated earlier this year, the PPS does not currently require an update, however it should be reviewed annually to ensure it is accurate.

Landscape

LA1 - Do you agree with the suggested policy approach towards landscape, as set out in LA 1 'Landscape' above? If not please suggest how it could be amended?

- 3.100 The consultation document sets out at LA 1 that policies should protect and wherever possible enhance landscape character and local distinctiveness.

- 3.101 Savills agrees with this policy approach.

LS2 - Should the key settlement gaps currently defined in Local Plan (Part Two) policy GBC 3 be reviewed? Could they be expanded, and/or should new key settlement gaps be identified in the Green Belt, or other areas to help protect the character of settlements?

- 3.102 In response to question LS2 above, the key settlement gaps should be reviewed in light of the current local housing need, which is a minimum of 1,928 new homes per year. As discussed above, for the Council to make sufficient land available to deliver the required homes, some land will need to be released from the Green Belt. This may also include land that is currently defined in Local Plan (Part Two) Policy GBC 3 as a key settlement gap.

- 3.103 On the basis that the Council is required to make enough land available to meet its local housing need in full within the Plan period, the key settlement gaps should be reviewed to ensure the policy

does not restrict sustainable residential development from coming forward. This approach would be consistent with the NPPF where it requires local authorities to meet local housing needs in full and to review Green Belt boundaries where necessary.

Green Infrastructure, Biodiversity, and Geodiversity

GI2 - Should new development contribute to woodland in Cheshire West and Chester? 5. Is a 2:1 ratio enough for a tree replacement policy?

- 3.104 At GI 1, the Issues and Options consultation document sets out the policy approach towards Green Infrastructure, Biodiversity and Geodiversity. In response to the tree planting ratio specifically, the 2:1 proposed ratio is appropriate and would significantly increase the overall number of trees in the District. An increased requirement for tree replacement would place a substantial cost on developers which can reduce developer confidence and in turn the rate of development.
- 3.105 There should be flexibility built into this policy to ensure that if there are site specific reasons why a large number of trees need to be removed, this can be accommodated without an unrealistic replacement programme.

GI3 - Should new Local Plan policy go above the 10% mandatory biodiversity net gain set nationally?

- 3.106 The mandatory requirement for certain developments to deliver a minimum 10% net gain in biodiversity is provided by the Environment Act 2021.
- 3.107 Savills consider that the New Local Plan should reflect the 10% requirement and not increase the requirement beyond this. It should be noted that the statutory requirement is for a minimum of 10% net gain to be provided as such, depending on the site specific constraints, viability and other factors, the legislation is designed to set the 10% as a minimum.
- 3.108 If the Local Plan adopted a policy requirement above the 10% mandatory requirement, this could risk reducing the number of homes that can be delivered, since an additional cost would be placed on developers, which could impact the viability of potential housing developments. The viability assessment supporting the New Local Plan would have to consider the financial implications of this.
- 3.109 The New Local Plan should reflect the national mandatory requirement of a minimum of 10% net gain.

Design and Sustainable Construction

DS1 - Do you agree with the suggested policy approach towards high quality design, as set out in DS1 'High quality design' above? If not please suggest how it could be amended?

- 3.110 At DS 1, the Issues and Options Consultation document sets out that the New Local Plan will promote sustainable, high quality design and construction.
- 3.111 Savills broadly supports the approach to design policy, particularly in relation to making the best use of high quality materials and reducing the opportunity for crime and disorder, and the fear of crime.
- 3.112 While the broad policy approach is supported, the New Local Plan should ensure that policies relating to design are flexible and take into account site characteristics.
- 3.113 With regards to Nationally Described Space Standards (NDSS) it should be noted that these can only be introduced where there is a clear need and the introduction of the Standards would not impact development viability. The Council will need to demonstrate robust justifiable evidence to introduce the NDSS.

- 3.114 It should also be noted that well-designed homes that are below NDSS provide high quality, functional homes, which are appropriate for various budgets. Smaller dwellings play a valuable role in meeting specific needs for both open market and affordable home ownership housing.

DS2 - If the Council produces a borough-wide Design Code, should this form part of the new Local Plan?

- 3.115 In response to question DS2, if the Council produces a borough-wide Design Code, this should inform the New Local Plan so that design policies are consistent and evidence-based.

- 3.116 Design policy that is clear and consistent and informed by a borough-wide Design Code will help inform development proposals for major development and will add clarity to what is expected of developments in terms of design. This will in turn increase developer confidence, which will have a positive influence on development.

DS6 - Do you think that the new Local Plan should set a higher local standard beyond the building regulations requirements to achieve net zero carbon in all new developments?

- 3.117 Northern Trust acknowledges the importance of advancing energy efficiency through a nationally consistent set of standards and a timetable that is universally understood and technically feasible. This aligns with the Written Ministerial Statement of December 2023 (WMS), which states that the Government does not expect plan-makers to set local energy efficiency standards for buildings that exceed current or planned building regulations.

- 3.118 The WMS clearly indicates that any planning policies proposing local energy efficiency standards for buildings that go beyond current or planned building regulations should be rejected at examination if they lack a well-reasoned and robustly costed rationale. This rationale must ensure that development remains viable and considers the impact on housing supply and affordability in accordance with the NPPF. Additionally, any extra requirements should be expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER), calculated using a specified version of the Standard Assessment Procedure (SAP).

- 3.119 Therefore, if the Council wishes to pursue this policy, it should use the TER and ensure that they have a well-reasoned and robustly costed rationale that fully considers viability and the potential impact of the policy on housing supply and affordability.

4. Summary and Conclusion

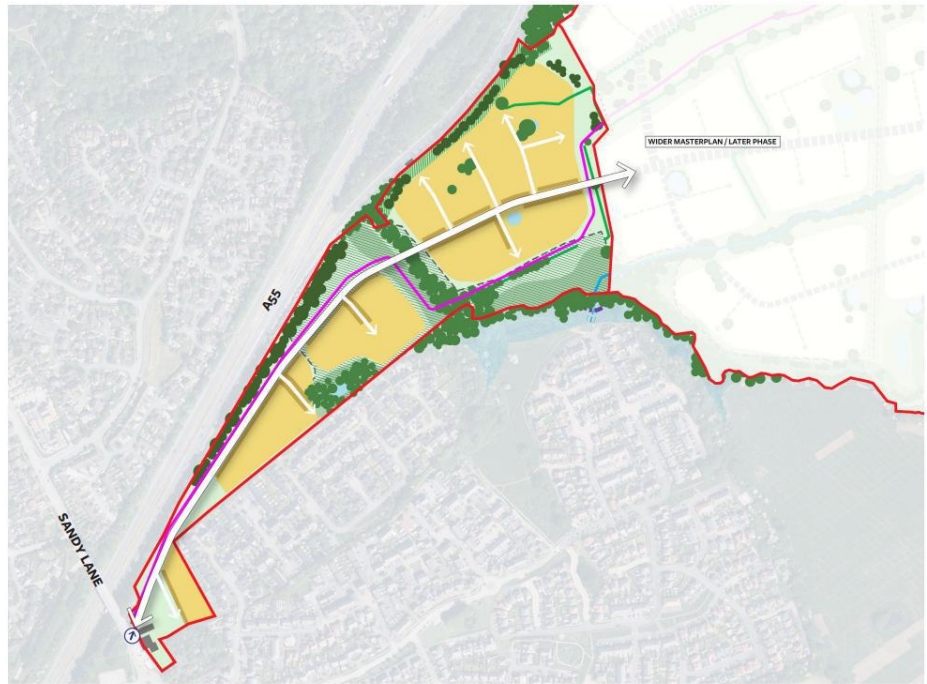
- 4.1 Savills is instructed by Northern Trust to make representations on the Issues and Options draft of the New Local Plan for Cheshire West and Chester.
- 4.2 Northern Trust has interests at Manor Farm, Christleton, which it is promoting to be allocated for housing in the New Local Plan. These representations make reference to this land in order to illustrate wider points in relation to the production of the new Local Plan.
- 4.3 Northern Trust is supportive of the Council's decision to prepare a new Local Plan and welcomes the opportunity to engage with this, and future consultations.
- 4.4 In general the Council is encouraged to be ambitious. This is both in terms of addressing the current housing crisis and moving towards carbon neutrality.
- 4.5 In terms of housing specifically, much of this is dependent on ensuring the right requirement, apportioning this housing to the right general locations, and ensuring that the most sustainable sites are allocated for delivery. These representations have stated a suitable course for the new Local Plan to follow.
- 4.6 Land at Manor Farm and land adjacent Rake & Pikel presents an excellent opportunity to deliver homes that are much-needed in this part of the District, in proximity to Chester and Christleton. The Site is a logical location for residential development and is demonstrably deliverable within the New Plan period. It is estimated that the site can deliver in the region of 250 – 300 homes.
- 4.7 The Site could come forward independently, since it has its own access via adjacent land to the south that is under the ownership of Northern Trust. The Site could also be delivered as part of a wider allocation that includes adjacent land to the east, at Manor Farm.
- 4.8 The Site presents an excellent opportunity to make a significant contribution to delivering housing that is needed in the District and as such, it should be included in the New Local Plan as a housing allocation.

Appendix A - Location Plan



Appendix B - Development Framework

- KEY**
- RESIDENTIAL PARCELS
 - MAIN ACCESS
 - LOCAL WILDLIFE SITE
 - TREES
 - CYCLEWAY
 - MAIN FRONTAGE
 - BUFFER PLANTING
 - HEDGEROWS
 - EXISTING BUILDINGS



DRAFT DEVELOPMENT FRAMEWORK
MANOR FARM

CLIENT: Northern Trust DRAWN: EJ CHECKED: TR APPROVED: MK
DATE: 28/08/25 DRAWING NO: UG_3256_URB_DFP_DRW_01

Appendix C - Transport Note

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Our Ref: Rake&Pikel-CUR-XX-XX-T-TP-00001-P01

28 August 2025

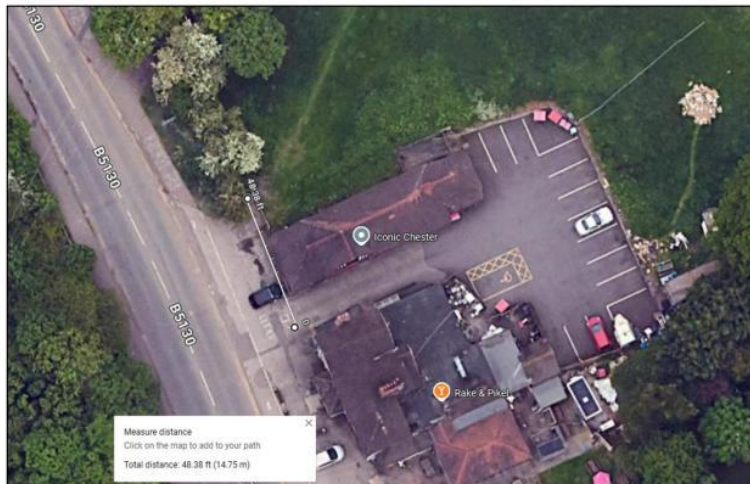
Land adjacent the Rake & Pikel, Chester, CH3 6BS

Initial Highways Desktop Review

Introduction

Following initial discussions with Northern Trust, Curtins have undertaken an initial desktop review with regards to a potential site located to the south of Chester – noted as land adjacent the Rake and Pikel, Chester, CH3 6BS.

Site ownership extends from the north of the pub building towards the existing substation; this provides in the region of 15m site frontage to achieve access. This would require demolition of the existing outbuilding within the yellow line and would facilitate a cross section of 3m shared footway/cycleway, 6m carriageway and 2m footway (11m total).



The existing car park to the rear of the Rake and Pikel would be accessed via the new access road and would provide an improved access when compared to the existing situation.

Along the site frontage, the B5130 includes a shared footway/cycleway on the eastern side which runs towards Chester in the north and continues south before it terminates near the junction with Artillery Road.

Curtins have also reviewed the CWAC interactive mapping for Public Rights of Way (PRoW) which notes that 'Huntingdon FP7' runs along the proposed location for access and through the site itself.

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This will be a key consideration for detailed masterplanning stage; the retention and realignment of the PRow would be the preferred option.



Dependent upon how many homes the site can ultimately accommodate, a secondary/emergency access may be required. This could potentially be accommodated via a section of land within the housing estate to the south (off Crawford Close) which abuts the Site and could deliver an emergency access.



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