

Question IN 1 Do you agree that this is the right evidence. Is there further evidence that you think will be required?

Great Boughton Parish Council believe that Cheshire West and Chester Council (CWaC) should prepare a **comprehensive urban capacity study** that would identify brownfield land in the urban areas and opportunities for intensification, particularly in areas with good public transport or the potential to provide good walking and cycling to reduce the need for travel, and regenerate left-behind urban communities in CWaC where life expectancies are 10 years less in deprived areas of the Borough rather than areas surrounded by green belt. Our evidence for this is:

- We know standard LPA brownfield registers are almost all out of date and of little use in identifying either developable or deliverable housing sites.
 - In 2022 the CPRE ['State of brownfield report'](#) showed that over 1.2 million homes could be built over 23,000 sites nationally covering more than 27,000 hectares of brownfield, including a minimum of 165,919 dwellings in the north west. This evidence suggests that there is a lot of extra developable brownfield land that has not yet been identified in the CWaC area.
 - Local communities in the Chester Green Belt Alliance have started the process of identifying additional housing land using the CPRE brownfield register toolkit. It is expected to demonstrate additional sites. We are keen to, and expect that CWaC will engage with us in this exercise.
 - Wirral MBC has just adopted a local plan without the need to allocate Green Belt or greenfields for development, and with a high degree of political consensus.
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Question IN 3 Do you have any comments or views on the proposed plan period?

Great Boughton Parish Council agree that 15 years is a reasonable period. Any more would increase pressure to allocate greenfield or Green Belt sites. These would inevitably be developed first, and use of brownfield land and urban regeneration would stall. It is almost impossible to see what economic or social factors will apply more than ten years ahead, so while significant strategic issues can be guessed at, it is not sensible to make tactical allocation decisions more than 15 years ahead.

Question IN 4 Do you have any comments on the initial SA/SEA

The Sustainability Appraisal rates current active travel accessibility is poor in some urban areas (Northwich, etc.) which downplays their potential to create sustainable communities should walking and cycling conditions be improved. Also, the SA appears to regard a bus service of 1ph as 'frequent'. These anomalies lead to some odd results in defining sustainable communities suitable for development. We do not accept the conclusions of the SA about the sustainability of the three strategic options – it fudges issues and does not come to a firm conclusion. It is non-sensical to suggest that the BAU option (B) is comparable in sustainability terms with Option A.

For the avoidance of doubt the A41, A51 and A56 do not have the capacity or the capacity to be configured to cope with the additional traffic and access points required. PM2.5 represents the next major 'buried health problem' following asbestos and smoking with residents' health already compromised by the presence of particles throughout their bodies. The suggestions that firstly either electric cars which are heavier and cause more road damage, and that increase PM2.5 particles from brakes and tyres, or that secondly bus use will solve the congestion, queueing and cut through traffic is misleading and will not meet the legal obligations on the Council to ensure that local air quality meets statutory standards.

Question IN 6 What role Neighbourhood Plans should play to meet development needs

Neighbourhood Plans provide an opportunity to commission a local housing needs study which operates at a detailed level using local knowledge and expertise and can identify housing needs for residents and those with a local connection as well as identify site that are acceptable to the local community. Christleton and Littleton

PC has just done this through their Neighbourhood Plan process. Once the level of genuine local need has been determined, the local community can allocate sites to meet this need through the NP process. We note that national funding for NPs has ceased, and this means that CWaC will need to allocate resources should it be intended that NPs play a significant role.

Where existing NPs have been adopted or are at an advanced stage, then there should be a strong presumption that the policies and allocation are incorporated in the new local plan.

Question SS 9 Have circumstances changed since the adoption of the Local Plan (Part One), that would now justify Green Belt release?

No. Part One included a detailed examination of Green Belt boundaries around Chester and concluded that the extent of the Green Belt was justified (apart from the release of one site - land at Wrexham Road) and that all parcels of land in the current Green Belt contribute to the purposes of the Green Belt. **This assessment remains valid.** While Government planning policy has evolved and new housing figures proposed, the thrust of the planning system is still heavily tilted towards urban regeneration and countryside protection. We believe that the additional housing to meet specific identified local need, and limited by highway capacity can be provided in existing communities to improve the quality of life and regenerate those communities.

Question SS 11 Which option which is the most appropriate spatial strategy:

Option A - Retain the Green Belt.

Question SS 14 Do you feel that Option A is an appropriate spatial strategy?

Yes. Chester Green Belt Alliance welcomes the Council's commitment to consultation and planning for sustainable growth. We support the value of the Green Belt in retaining the separate identity of villages to the east of Chester, environmental quality, heritage, community character and preserving the setting of the historic City of Chester as well as encouraging urban regeneration in some of the boroughs less favoured urban areas where life expectancy is around ten years less than the rural villages.

The detailed boundary of the Green Belt around Chester was defined in 1983 in the Greater Chester Local Plan. For 40 years, it has been under intense pressure from developers at every stage of the planning process. The last examination (Local Plan Part One) concluded that further Green Belt release around Chester would have "a significant adverse effect on the purposes of including land within the Green Belt."

The Chester Green Belt provides a valuable escape from city life, mental health benefits and opportunities for outdoor recreation opportunities. Green Belt is the single best understood planning policy which retains almost universal support (apart from people who would make profits out of its development). Green Belt also contributes to the borough's quality of life and attractiveness for residents and businesses. Cheshire West and Chester benefits economically from its rural character and proximity to green space, which underpin tourism, recreation, and wellbeing. Put simply, without the Green Belt, Chester and Cheshire would not be the Chester and Cheshire we know and love today.

We are concerned that the Council may select a 'hybrid' option of 'A' plus elements of the other options. To be clear, this would NOT be 'Option A' and **Great Boughton Parish Council is completely opposed to a compromise that would actually mean significant development in the Green Belt.**

Question SS 16 Do you feel that Option B is an appropriate spatial strategy?

No. Option B might appear familiar, but this should not be mistaken for sustainability. Continuing the current distribution pattern requires release of Green Belt for around 11,000 homes and would repeat the weaknesses of the existing spatial strategy without responding to new environmental, economic, and demographic realities including the climate crisis.

Option B entrenches a development pattern that disproportionately targets peripheral sites, often on high-value agricultural or biodiverse land, rather than focusing on the regeneration potential within the urban area. By doing so, it misses the opportunity to reinvest in struggling town centres and risks accelerating their decline. For example, under-occupied retail areas in Ellesmere Port and vacant industrial estates in Winsford could be developed as compact, sustainable communities that avoid car-dependence. Otherwise, they will continue to struggle.

Option B weakens the borough's ability to defend against speculative applications. Once a precedent for Green Belt release is established, it becomes harder to resist further encroachment. The incremental erosion of Green Belt is often the result.

From a climate change perspective, Option B's pattern of dispersed development results in higher car dependency. Most peripheral sites listed in option B lack frequent public transport and are too far from employment hubs to support walking or cycling as primary modes. For instance, the service on the Mid-Cheshire Line is painfully slow and infrequent and of little use in journeys east towards Greater Manchester and the Airport. Chester station is poorly located with respect to the City centre. This undermines the Council's carbon reduction targets and increases congestion on radial road routes into Chester, Ellesmere Port, and Northwich.

This is particularly acute to the east of Chester with systemic congestion on the A41/51, air quality that fails WHO standards, no rail stations and no prospect that bus routes will be given meaningful priority. The conditions on these roads are uniformly hostile to walking or cycling.

Option B also spreads limited developer contributions thinly across multiple areas, resulting in "half-measures" for schools, GP surgeries, and road capacity improvements rather than fully funded facilities. This leaves communities with enduring service gaps and undermines public support for new development.

Economically, the option risks creating new dormitory suburbs without adequate local employment, retail or social provision. Jobs tend to remain concentrated in larger centres or industrial zones, forcing new residents to commute long distances and adding pressure to transport networks. The Sustainability Appraisal does not sufficiently address these issues.

Finally, Option B does little to address the borough's brownfield land supply challenge. By relying heavily on peripheral release, it reduces the incentive for developers to tackle more complex urban regeneration projects. This is contrary to both national guidance and the Council's own ambitions for revitalised, vibrant town centres.

Question SS 18 Do you feel that Option C is an appropriate spatial strategy?

No. Option C sounds progressive—linking growth to sustainable transport—but in practice it represents the most aggressive Green Belt release of all three options, over 12,000 homes. This undermines the very sustainability it claims to promote.

The logic of Option C assumes that building along rail or bus corridors will automatically reduce car dependency. In reality, many proposed sites along these corridors are still distant from stations, lack safe walking and cycling routes, and have limited public transport frequency especially outside peak hours. Without guaranteed and sustained investment in service improvements, such developments risk becoming car-dependent despite their "corridor" label.

The scale and dispersal of development under Option C is also problematic. By spreading growth across multiple settlements, it dilutes the capacity to fund and deliver infrastructure upgrades. Large-scale growth in fewer locations allows economies of scale in infrastructure provision; corridor-based dispersal does not. Communities along these corridors could experience population growth without service improvements, undermining social cohesion.

Option C risks "ribbon development" along transport routes, leading to gradual merging of distinct settlements. This directly contravenes one of the core purposes of Green Belt: preventing neighbouring towns and villages

from coalescing. The visual and landscape impacts of linear sprawl can be particularly severe, eroding rural character over long distances.

Environmental impacts would be extensive. It would exacerbate flood risk, fragment wildlife habitats, and permanently develop high-value agricultural land compromise.

Economically, Option C risks undermining town centre regeneration. If new housing is concentrated along corridors but outside main centres, residents may commute out of the borough entirely, increasing car commuting, reducing local spending and weakening urban areas in the borough.

Lastly, the viability of Option C depends on aligning housing delivery with significant public transport, cycling and walking investment – something that rarely happens. The result could be isolated developments poorly served by sustainable travel options, effectively locking in car dependency for decades.

Overall option C presents high environmental costs, questionable transport benefits, and serious risks to community and landscape integrity. It is the least defensible option when measured against the Council's sustainability and climate objectives.

Question SS 22 Do you have any other comments or suggestions you wish to make about our approach to identifying potential growth areas or allocations

The draft plan does not suggest an approach to Grey Belt. Landowners and developers will always make the self-serving case that their piece of land is Grey Belt and therefore should be allocated for development. For plan-making, the point about Grey Belt is that authorities must release it first in sequence before they release non-grey Green Belt land. If land is Grey Belt, it does not mean that it must be removed from Green Belt or that it should be allocated for development – just that if needed it should be in the first tranche to be considered.

We are confident that firstly, there is sufficient brownfield and other land in urban areas, and potential for urban regeneration and intensification that means that any release of Green Belt (whether Grey or not) is unnecessary. Identifying this supply may require additional work from CWaC and local communities, including using the CPRE Brownfield Toolkit which has successfully been used nationally in many local areas to identify significant areas of brownfield land additional to that which the LPA had already identified. It is also clear from the recently adopted Wirral Local Plan (in an adjacent local authority that has significant and restrictive Green Belt) that this strategy is feasible and defensible at a local plan inquiry. This approach is also more sustainable than the current CWaC approach and directly addresses the significant economic and social inequalities in the borough by directing development and investment to areas that need it.

Question SS 23 Which of the identified potential growth areas around Chester do you consider to be the most suitable?

Great Boughton Parish Council does not think any of the identified potential growth areas around Chester are suitable. They all suffer from the flaws we have identified in our answer to SS 24.

Question SS 24 Do you have any further comments about any of the potential growth areas identified around Chester?

CH02. This site should not be removed from the Green Belt or allocated for development.

Landowners and developers all want to make the case that their piece of land is Grey Belt and therefore should be allocated for development. As suggested in our answer to SS 22, for plan-making, the point about Grey Belt is that authorities must release it *first* in sequence before they release non-grey Green Belt land. It does not mean either that if land is Grey Belt then it must be removed from Green Belt or that it should be allocated for development.

There is sufficient brownfield and other land in urban areas, and potential for urban regeneration and intensification that means that any release of Green Belt is unnecessary. This may require additional work from

CWaC and local communities, including using the CPRE Brownfield Toolkit which has successfully been used to identify significant areas of brownfield land additional to that which the LPA had already identified. It is also clear from the recently adopted Wirral Local Plan (in an adjacent local authority that has significant and restrictive Green Belt) that this strategy is feasible and defensible at a local plan inquiry. It is also sustainable and addresses the significant inequalities in the borough.

CH02 fails to meet the NPPF definition of Grey Belt. CH02 is an area between the dual carriageway A41 and the Motorway standard A55(T). The built-up area of Chester is hard-up against the western edge, but CH02 itself is remarkably like the rural area to the east. CH02 is primarily agricultural with wide views softened by trees and hedges. There is little built development. To be Grey Belt, the land must '*not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143.*'.

a) to check the unrestricted sprawl of large built-up areas The A41 has proved to be a durable barrier to the sprawl of urban Chester (a small, compact cathedral city in a rural hinterland), for four decades. CH02 has remained rural and prevented the spread of suburbia. Without it, sprawl would have already overwhelmed villages such as Christleton and Littleton, Guilden Sutton, Rowton, Waverton and Pipers Ash. This means that by definition, **CH02 contributes strongly to purpose (a).**

No doubt developers will claim that the A55(T) would form a new barrier to outward sprawl. However, this would be logical nonsense – if the A41 is not able to form a durable barrier (which it would not by definition, if CH02 is allocated for development), then clearly the A55(T) would not form a durable barrier either. Exactly the same logic could be applied to other land – for instance between the A55(T) and Christleton village.

b) to prevent neighbouring towns merging into one another; The site is in a strategic gap that stops the discrete villages to the east of Chester merging with the Chester urban area. While the NPPF does not provide a strict definition of 'town', they are seen as distinct built-up areas whose physical and cultural boundaries merit special protection – which is the case with the distinctive and attractive villages to the east of Chester. For instance, if CH02 was built up, then Chester would merge with Christleton along the A41, and the village would no longer be separate. This also applies to other communities such as Guilden Sutton, Rowton, Waverton and Pipers Ash. Overall CH02 makes a **moderate/strong contribution to purpose (b).**

d) to preserve the setting and special character of historic towns. Protecting the setting of the cathedral city of Chester was a key consideration in the original designation in 1983 and has remained so ever since. CH02 is the nearest Green Belt and just 2km from the cathedral and city walls, so again, almost by definition **CH02 contributes strongly to purpose (d).**

If CH02 contributed strongly to any one of NPPF143 (a), (b), or (d) it would not be considered Grey Belt. But it contributes strongly to both (a) and (d) so is therefore not Grey Belt. The conclusion is that even if release of Green Belt land was justified overall (which we do not think it is), that in terms of plan-making, CH02 should not be considered.

There are a number of other factors that make CH02 unsuitable for development.

Traffic congestion

- Traffic is already a serious issue with extreme congestion and queues of 0.5 mile common on the A41 and A51. Residents often feel like prisoners in their own homes.
- When one of the frequent incidents occur, Google Maps will inevitably route drivers through the villages resulting in further gridlock. This is not accounted for in standard traffic assessment, but it has a real impact on the quality of life for residents.
- CH02 is proposed for 35 dwellings per hectare (dph), which would lead to the standard low-density sprawl favoured by the major speculative house-builders. As well as being wasteful of land, here is no recent development in Cheshire where this density has led to either sustainable bus route, or to provision of high-quality walking and cycling routes.

- Rows of identikit houses from spec-builders would all have several cars which would lead to further car dependency, worse air quality and more congestion
- It is unlikely that suitable additional transport infrastructure could be provided. There is no room for a dedicated public transport link (such as a continuous busway) and it is almost no possibility that an attractive, convenient cycle or pedestrian link could be provided. Mickle Trafford and Guilden Sutton Villages were subjected to significant house building in the 1970/80s but those developments were not accompanied by highway network improvements.
- There is very limited space to provide additional capacity for cars, and none to provide priority for buses, cyclists or pedestrians. [Transport for New Homes research in 2025](#) found that building in locations comparable to CH02 will inevitably lead to a car-dependent community with few local facilities. TfNH studied 20 new greenfield housing developments across England. Nearly all were **designed around the car**, not sustainable transport. Often residents had to drive for nearly every journey. Residential development on CH02 is not compatible with other stated CWaC local plan objectives.
- Although the A56 does not see the same volume of traffic buildup as the A41 and A51 there are numerous rat runs, the most significant being Station Lane in Mickle Trafford which joins with Guilden Sutton Lane leading to the A41 and Wicker Lane leading to the A55. At the outer extent of CH02 Mannings Lane is speed restricted in part and single carriageway for much of its length and wholly unsuitable for additional traffic.

Local Air quality

- Air pollution is already a serious problem in the A41/51 corridors, with limits regularly breaching WHO guidelines. This will inevitably result in avoidable early deaths, and an increase in asthma, Chronic respiratory disease, heart disease and birth defects.
- The [Air Quality Report and other evidence](#) for the Christleton and Littleton Neighbourhood Plan showed that levels of pollution near the A41 and through Christleton Village centre to the A51 is comparable to larger urban locations like Bolton, Bournemouth, Leicester, Edinburgh, Manchester, Newcastle, Liverpool, and Bristol. A wide range of respiratory and cardiovascular chronic conditions result from traffic already in the area.
- The Highways network surrounding and through the centre of Christleton are stretched to breaking point with unacceptable serious and life changing accident injury rates from the traffic and congestion as well as oxides of nitrogen and PM2.5 exposure to residents, visitors, schoolchildren and the elderly.
- About 4 million people die globally each year as result of outdoor exposure to particulate air pollution. 520,000 excess European deaths a year were attributed to air pollution in 2017. In the UK 40,000 deaths a year are attributed to air. These are mainly due to exposure to nitrogen dioxide (NO₂) and fine particles (PM 2.5), including those from tyres and disc brakes which means electric vehicles are not a solution. Also, the additional weight means more road damage
- It is unrealistic to expect new residential areas at a low 35dph density to generate sustainable bus services attractive enough to achieve mode shift from cars, and there are no known locations where this has been successful.

Question 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?*

The overall approach is correct, although it is not sufficiently ambitious. There is a high potential for urban intensification to provide a greater density of dwellings that in turn would create walkable areas with good levels of amenities and standard of living. This would be more sustainable and avoid the need to develop greenfield sites outside the current city boundaries. Some communities, for example near the centre of Chester already display these characteristics and could be transferred to other areas.

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The lack of ambition shows up in the assumed residential densities – 35dph for CH02 is far too low to provide enough local users for either decent local facilities or high-quality public transport to Chester and other destinations.
