

1 Summary

This is an objection to Planning Application **25/02656/OUT**, submitted on **26 August 2025**, proposing up to **200 dwellings**, public open space, landscaping, and associated infrastructure at **Whitchurch Road, Christleton, Chester** pa.cheshirewestandchester.gov.uk.

We believe the application should be refused because:

1. The land **does not meet the new Government tests for ‘Grey Belt’** - the applicant attempts to make the case that the land is Grey Belt, but the parcel does, in fact make a strong contribution to the purposes of the Green Belt (confirmed by previous assessments and local plan processes). It strongly contributes to green belt purposes a, and d – either of which would mean that the site is not ‘Grey Belt.’
2. The site is currently designated as **Green Belt** - the proposal is therefore by definition **inappropriate development**. The application would lead to harm to the Green Belt that is not clearly outweighed by public benefits. The development is contrary to national and local Green Belt policies. The Planning Statement supplied by the applicant does not make the case for the ‘Very Special Circumstances’ that might make this development acceptable in planning terms, and **no VSC apply in this case**.
3. **The application is premature** - the replacement local plan is currently subject to a Rule 18 consultation. Key strategic option A is ‘Retain Green Belt.’ Approval of this application would clearly prejudice the adoption of this option and render the Council’s deliberations redundant. If CWaC find the proposals are premature then it is entitled to refuse the applications as a primary consideration and there is no need to go on and undertake a planning balance exercise, even though we believe this balance is negative.
4. **Highways - the single access point is inadequate and dangerous** - the A41 south is the only ‘no height’ restriction trunk road connected from Chester south along the A5115 and from Holyhead and North Wales via the Hamburger junction and south along the A41 to Shrewsbury and on to the Midlands. It is therefore heavily used for abnormally high and wide loads. The Hamburger junction inadequate design restricts the A41 18,000/day traffic flow and creates a continuous queue of vehicles a mile long from Waverton to the Hamburger junction at peak and school arrival and departure times. The existing 200 houses along this section of the A41 already find it impossible to access and leave the continuous queue. **The further 200 houses proposed in this development would have just one proposed access directly on and off the A41. This one access point will not work as it would be blocked off by traffic queues several times a day. The right and left turns for vehicles out of the development, the pedestrian and cycling access across the A41 via a toucan crossing and the Toll Bar Road cut through traffic trying to carve a way through cycling and walking schoolchildren on the shared user path will create frustration, confusion, angry motorists, a disproportionate increase in A41 queue lengths schoolchildren accident injury risk. The development does not conform to the Council’s highway standards and the proposed location of this single access point and a toucan crossing so close the Toll Bar Road entry and exit is dangerous.**
5. **Safety of schoolchildren** - more than half of the Christleton High School children live in the direction of Great Boughton or Huntington and need to use the A41 shared user path to cycle or walk to school. Cycling School children are only a few feet away from fast moving HGVs travelling south on the A41 roadway. Cycling children regularly stray

or fall into the road and one child, close to the single access point to the proposed development, incurred life changing injuries. **A large proportion of Great Boughton and Huntington school children are fearful of this necessary route they have to take to school.** The single access point and the additional toucan crossing increase the complexity of vehicle, cycling and pedestrian movements and the accident injury risks to schoolchildren. **The applicant has not taken into account that the entire complement of over 1600 schoolchildren and staff of the High School and Primary school have to travel to and from the High School and Primary School, twice a day, along heavily congested, gridlocked and polluted roadways, with inadequate footpaths, over a 25 minute period – to put this into perspective this rate is equivalent to the population of Chester over a 24 hour period.**

6. The **location** form and inadequate vehicular, cycling and walking access, across a traffic queue, to and from the development will create a community that is car dependent and isolated from adjacent communities and services and is therefore **unsustainable**.
7. The development will result in the loss of ten hectares of the **best and most versatile agricultural land**.
8. **Air quality** - NO₂ and PM_{2.5} pollution on the A41 is worse than most of the area within the designated Chester AQMA. The proposed junction required to accommodate the vehicles on and off the development will have a detrimental impact on air quality, leading directly to chronic respiratory, asthma, heart, and birth defects.
9. **Housing need** – Christleton Parish Council has carried out a housing needs survey which has revealed a need for only 15 dwellings locally as the Parish is surrounded by inadequate Highways infrastructure. The proposed 200 houses should be located where there is anticipated growth in employment and safe and multiple access points to the development

2 Grey Belt

The Planning Statement from the applicant argues that the site is 'Grey Belt.' It also provides a Green Belt 'assessment' and suggests that the site is Grey Belt. But this is just special pleading from a developer that wishes to develop their land. The local authority should seek independent review of this evidence. To be Grey Belt, NPPF states 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 applicant suggests that the site '*makes a weak contribution to purpose (a), due to the presence of scattered development and existing road infrastructure to the north and the degree of containment provided by the A55. The A55 provides a durable definitive feature that separates the site from the wider landscape to the east and would form a clear defensible boundary.*'

Our assessment of the site is that it is currently undeveloped agricultural land which creates a clear buffer between the urban area and wider countryside. Sprawl is defined in the planning guidance as land which '*if developed, (would) result in an incongruous pattern of development ...*'. The proposed development would be incongruous.

Applicant assertion for GB purpose (a)	Our assessment
<i>presence of scattered development and existing road infrastructure to the north</i>	There is no scattered development to the north. While the area between the A41 and the railway is fully developed, there is no

	development north and east of the railway and this is open agricultural land. The development site itself has no development. The adjacent Hotel is a use specifically related to nearby major roads.
<i>degree of containment provided by the A55. The A55 provides a durable definitive feature that separates the site from the wider landscape to the east and would form a clear defensible boundary.'</i>	The A41 already provides a ' <i>durable definitive feature</i> ' between the urban area of Chester and the wider agricultural area – and this barrier should be respected. If the A41 cannot provide a defensible barrier to the sprawl of Chester (which by definition it doesn't if this application is approved), there is no reason to suggest that the A55 would provide any sort of barrier to contain the sprawl of the urban area of Chester.

Our conclusion is that the site contributes **strongly** to Green Belt purpose (a) as it clearly contains the outward sprawl of the built-up area of Chester. The A41 is a strong, logical, defensible barrier to the spread of further development into the countryside.

b) to prevent neighbouring towns merging into one another; The site is in a strategic gap that stops the villages such as Chistleton merging into Great Boughton and the wider Chester urban area. The applicant suggests '*the site does not form part of a gap between Chester and the 'urban settlement' (town) of Ellesmere Port to the north. In addition, the site is situated to the west of Christleton, which is a village rather than a town, and experiences limited visual connectivity with the village because of the bridge and elevated form of the A55 dual carriageway and intervening vegetation preventing coalescence*'.

Applicant assertion for GB purpose (b)	Our assessment
<i>as the site does not form part of a gap between Chester and the 'urban settlement' (town) of Ellesmere Port to the north</i>	This is a straw man – no one suggests that the site separates Chester from Ellesmere Port
<i>Christleton, is a village rather than a town</i>	Agreed
<i>(the development site) experiences limited visual connectivity with the village (Christleton) because of the bridge and elevated form of the A55 dual carriageway ...preventing coalescence'.</i>	The site is part of the parish of Christleton and is associated with the village. It is clearly the last remaining area of open land between Christleton, and the urban area of Chester and development would result in complete merger of the currently separate village and Chester. The A55 and bridge will not 'prevent coalescence' – the two settlements will be physically joined.
<i>intervening vegetation preventing coalescence</i>	It is not understood what the applicant means by this. There is no 'vegetation' preventing coalescence, and vegetation and proposed landscaping is not permanent anyway so could not prevent coalescence.

Our conclusion is that the site makes **little contribution** to Green Belt purpose (b) although it does play a significant role in separating Christleton from the built-up area of Chester and maintaining its separate identity as a village.

d) to preserve the setting and special character of historic towns. This criterion is clearly applicable to the Chester Green Belt and indeed preserving the setting and special character of Chester was a primary reason for its designation.

The applicant asserts that *'The site makes no contribution to purpose (d), as whilst Chester is a historic town, the site is not located within or adjacent to the historic core of the city, and it does not form part of a key approach or gateway that contributes meaningfully to Chester's historic setting. In addition, the site's surrounding context is characterised by suburban development, transport corridors, and semi-urban fringe elements, therefore the site does not form part of the immediate or sensitive setting of Chester's historic townscape.'*

In English planning policy land **does not** have to be close to the city centre to be considered important for preserving its historic setting. Instead, it refers to any land that plays a role in:

- Maintaining visual separation between historic urban areas and nearby development.
- Protecting views or approaches into the town (even from a distance).
- Preserving the landscape context or historic layout of a town (such as parks, historic farmland, or village settings – including Christleton).
- Preventing urban sprawl that might encroach on areas important to the character of a historic place.

Outlying villages such as Christleton that have a separate identity and that historically formed part of a town's setting are also relevant, even if they are not near the centre. This is the case here, as Christleton, Littleton and other villages are part of the setting of the historic city.

Applicant assertion for GB purpose (d)	Our assessment
<i>whilst Chester is a historic town, the site is not located within or adjacent to the historic core of the city,</i>	Land does not have to be near the centre of a historic city to be important for preserving its historic setting.
<i>and it does not form part of a key approach or gateway that contributes meaningfully to Chester's historic setting.</i>	Land does not have to be part of a key approach or gateway. The applicant's Green Belt assessment has simply got this wrong.
<i>The site's surrounding context is characterised by suburban development, transport corridors, and semi-urban fringe elements, therefore the site does not form part of the immediate or sensitive setting of Chester's historic townscape'</i>	Again, this is irrelevant to the role of the site in protecting the setting of Chester as an historic city.

Our conclusion is that the site contributes **strongly** to Green Belt purpose (d) as it clearly preserves the setting and special character of historic Chester.

NPPF 155b also requires that there should be a *'demonstrable unmet need for the type of development proposed'*. While we accept that there is a need for additional housing development in the CWaC area, and indeed housing would be welcomed in urban areas of the

borough that need regeneration, for there to be a ‘demonstrable unmet need’ requires the applicant to show that there are no available sites that are not Green Belt. They have not conducted this exercise.

Our conclusion is that the site does not meet the terms of NPPF155b as the applicant has not shown ‘*demonstrable unmet need for the type of development proposed*’.

NPPF 143/155	Summary of contribution	Does it meet the Grey Belt Criteria?
a) to check the unrestricted sprawl of large built-up areas	The development results in an incongruous pattern of development, allowing Chester to sprawl with unrestricted, low-density development.	No
b) to prevent neighbouring towns merging into one another	The development reduces a strategic gap between settlements, but Christleton is a village rather than a town.	Yes
d) to preserve the setting and special character of historic towns	The site clearly protects the setting of Chester and protects its character from low-density peripheral developments.	No
Demonstrable unmet need for the type of development proposed (155)	No evidence that Green Belt land needed rather than a brownfield or existing designated site.	No

Grey Belt policy is new and evolving as experience and case law develops. So far, the approach to what is or is not Grey Belt has been inconsistent among planning authorities and Inspectors, so individual decisions should be treated with caution and not as precedent. In this case the site comprehensively fails to meet the criteria for Grey Belt.

3 Green Belt

The current Local Plan (Part One) establishes a spatial strategy that directs significant development toward towns and larger villages, to protect the intrinsic character and setting of smaller settlements. Growth should reflect sustainable locations with adequate infrastructure and services. Part Two sets out allocations consistent with that approach; however, this site is not allocated for development of any sort but is designated as Green Belt and lies outside defined development limits. It would result in unplanned expansion into a rural edge area where infrastructure and services are insufficient. Although the borough faces housing pressure, this is a peripheral location where any residential development will inevitably be car dependent. Both Parts One and Two emphasise sustainable transport corridors and well-integrated development.

The test for development of Green Belt land is ‘Very Special Circumstances’ (VSC). This is long established as an extremely high bar, and any alleged lack of housing land supply is not

sufficient on its own to justify VSC. Set against this in the planning balance are the merging of Chistleton and Chester, traffic congestion and danger, air pollution, the landscape harm, and the loss of best and most versatile agricultural land.

The only possible conclusion once the local planning authority has decided that the land is not Grey Belt is that normal Green Belt policies apply, that there are no VSC and that the application should be refused.

4 Prematurity Relative to Local Plan Review

The Council is preparing a consolidated Local Plan, combining Part One and Part Two. The Regulation 18 “Issues & Options” consultation ran from to 29 August 2025 and the Parishes presenting this objection have provided a representation to the consultation. It identifies an Option A as ‘Retain Green Belt’ which envisages regeneration in urban areas and on brownfield land and no additional Green Belt development. By allowing development on a large and strategy area of Green Belt, approval of 25/02656/OUT would **clearly prejudice the adoption of Option A** and render the consultation redundant. Premature approval would pre-empt decisions on sustainable patterns of development.

In addition, the **Christleton & Littleton Neighbourhood Plan** area has been designated, and the plan is actively being developed. Having submitted a Parish Priority Statement, the plan is ready for Regulation 14 public consultation. The current planning application would run counter to this plan which seeks to avoid additional residential development.

When considering prematurity, NPPF suggests that a local plan should be ‘at an advanced stage’ but does not define this precisely, so it is interpreted through policy and case law and the judgment of individual local planning authorities. Prematurity was a decisive factor in the recent refusal at appeal of the Leverhulme Estates applications on the Wirral where approval was denied as it would be prejudicial to the adoption of a local plan that avoided Green Belt development. The new Wirral Local Plan has been adopted, which shows that in a borough with even greater constraints than CWaC, that it is possible to provide a healthy land supply and regenerate urban areas without the need to develop Green Belt land.

While we know that prematurity should be used sparingly, granting permission would prejudice the plan-making process, particularly as Strategic Option ‘A’ is ‘Protect Green Belt’.

4 Highway issues

On 19 September National Highways placed a holding direction to prevent approval of the application before 4 November. They raised several fundamental concerns about the evidence provided by the applicant including:

- Whether background traffic studies and levels were accurate.
- The need to include traffic growth, and to extend the assessment beyond the very limited date of 2030.
- Doubts that the assessment included all planned developments (cumulative effects)
- Doubts that the traffic data used for junction assessments reflect neutral conditions, considering monthly variation and neutral weekdays.
- Concerns about safety and the nature and location of incidents that have killed and seriously injured people.

Placing a holding direction is not routine and is only used by NH where there are significant defects in the information provided with an application.

Residents have a detailed knowledge of traffic conditions in the area that often does not come up in formal transport assessments but nevertheless reduce the quality of life for people living and working in the area. These include:

- Traffic already queues on the west side of the A41 for a mile from Waverton to the hamburger junction.
- Waves of school children cycling and walking, on a shared user path narrowed by residents parking, several abreast only 1m away from fast moving traffic on the east side of the A41 from the hamburger towards Waverton.
- PM2.5 pollution is at 10 times guidelines levels at peak times which equates to 2 times average guideline levels. NO2 levels that exceed average guideline levels and are worse than 77% of measurements inside the Chester AQMA.
- There are regular serious injuries caused by vehicles. A cyclist recently fell into the road on the east side of the A41 in front of a fast-moving HGV, resulting in a life changing injury.
- Traffic trying to avoid the queues on the east side of the A41 and the A41 ring road cut through Toll Bar road crossing the path of waves of schoolchildren cycling and walking on the shared user path
- The new access involves a second toucan crossing, less than 100m from an existing toucan crossing, highways markings and a road centre refuge to accommodate traffic turning into and out of the development, adjacent to stationary and fast moving A41 traffic cutting through Toll Bar traffic across the path of cycling and walking schoolchildren. The complexity created by stationary and fast moving cars on the A41, vehicles cutting through Toll Bar road, vehicles accessing and leaving the development, waves of schoolchildren cycling and walking across and along the A41 will generate unacceptable complexity and accident injury risks for the hundreds of school children trying to travel safely to and from school.
- Finally this single access point, off a long distant Highways route south, will be forced to accommodate the hundreds of movements in and out of the development required to enable the 200 houses to be built. The accident injury risk to road vehicles drivers, residents and especially to schoolchildren over several years will be unacceptable.

A Chartered Highway Engineer compiled the following section. The proposed development conflicts with Policy STRAT 10 of the Adopted Local Plan (Part One) for the following reasons:

1. The section of the A41 where the site access is proposed is a key walking and cycling route for 200-300 children from Great Boughton and Huntington travelling to and from Christleton High School / Christleton Primary school over two periods of 20-25 minutes each day. These movements of vulnerable Non-Motorised Users (NMUs) occur in waves and often with groups of children walking abreast (for example, see Google Streetview). The footway part of the segregated foot / cycleway on the northern side of the A41 is also regularly parked within, forcing these vulnerable NMUs into the cycleway part of the share path, and occasionally causing them (particularly when in groups) to step or sometimes fall into the A41 carriageway, which is extremely well-trafficked. There are children who have been struck by passing vehicles in this way, including one example of

a child (still at the school) being permanently disabled. The addition of a new access and the intensification in development-related traffic in this vicinity could therefore compound these current road safety concerns and shortfalls.

2. The existing road safety record, available on Crashmap, only extends to the end of 2023. Nonetheless, it indicates that there has been a cluster of accidents in the immediate vicinity of the site access, including three slight severity and two serious severity accidents at either side of the proposed access to the site, in the most-recently available 5-year period.
3. The proposed site access junction would introduce new confusing conflict points, and an unusually arranged Toucan crossing would dissect the ghost island right turn (GIRT) markings, at a location which provides direct frontage access to residential properties and is close to other junctions.
4. The 42m visibility splay from the proposed site access overlaps slightly with the visibility splay from the adjacent Mercure Hotel access to the east. In other words, a vehicle leaving the hotel would partially block the view of oncoming traffic for a vehicle waiting to egress the proposed site access. This is a safety concern.
5. Whilst the A41 is a de-trunked road under the control of CWaC, it is a locally strategic road through the County. It serves as a key route for HGVs (according to 2024 DfT data, 6.7% of A41 traffic is composed of HGVs / buses /coaches) and provides the shortest A Road route between Chester and south Cheshire / Shropshire and beyond. It still has the characteristics of a trunk road. The proposed site access arrangement has therefore been assessed against the robust highway design standards within the Design Manual for Roads and Bridges (DMRB) – “*CD123 Geometric design of at-grade priority and signal-controlled junctions*”.
6. A checklist of how the design compares to the relevant sections of DMRB demonstrates that there are shortfalls in the design relating to: -
 - The selected junction type (GIRT) being outside of the traffic flow range of Figure 2.3.1 of CD123.
 - The hatch taper lengths of the junction and asymmetric nature of the hatching; and
 - Inadequate deceleration length within the ghost island.
7. Transport Assessment (TA) review
 - i) The TA does not include the raw traffic survey data. This should include queue count data, given the extensive queues and slow-moving traffic regularly observed along the A41 and elsewhere.
 - ii) The TA presents a synthesized forecast of flows to and from Toll Bar Road, due to the fact this junction was not originally surveyed but was then requested to be assessed within the TA study area by CWaCC during pre-application discussions. However, the synthesized forecast traffic flows to and from Toll Bar Road, set out in the Traffic Figures in the TA, look to be incredibly low. Moreover, they do not seem to consider that, according to observations by residents, Toll Bar Road serves as a rat-run for southbound traffic on the A41 Ring Road to avoid the A41 / A5115 / Caldys Valley Road / North Wales Expressway gyratory junction. See also below for further commentary on the Toll Bar Road modelling results.

- iii) There is no indication that the technical assumptions within the Scoping Notes in Appendix E of the TA were acceptable to CWaC or National Highways (including those on the committed development allowances and the journey to work trip distribution assumptions). No correspondence between Curtins and CWaCC / NH is presented within the TA, as would normally be expected.
- iv) The response to problem 2.4.1 of the Road Safety Audit (to reduce the hatched markings west of the Toucan crossing) could easily have an undesirable side-effect of inducing right-turning drivers to enter the area that would otherwise be hatched, to the detriment of road safety. It would appear to drivers, as the tapered entry to the GIRT which would be confusing and dangerous.
- v) The PICADY capacity assessment results for the A41 / site access / Toll Bar Road staggered crossroads suggest that, whilst the queuing and ratio of flow-to-capacity (RFC) values are within acceptable parameters (although the underlying flows for Toll Bar Road should be reviewed, see above points), the amount of forecast delay for vehicles attempting to turn out of the minor arms, particularly Toll Bar Road, is very high, rising to 142 seconds (2.5 minutes) in the AM peak and 92 seconds (1.5 minutes) in the PM peak. This is consistent with the typical everyday experience of residents attempting to egress their driveways and other minor arm junctions along this section of the A41. This level of delay will lead to driver frustration, could lead to vehicles inappropriately seeking to push out into insufficient gaps, which then results in a safety issue. For example, Warwickshire County Council Highways deem that any junction minor arm that has an average emergence delay of over 30 seconds per vehicle as inherently unsafe. PICADY software itself sets a default threshold of 36 seconds as the point at which delay performance is deemed to be below an acceptable level. It is for this reason that the raw PICADY assessment printouts in Appendix F of the TA indicate a level of service (LOS) of 'F' for Toll Bar Road (arm D), out of a possible range of A to F (i.e. the lowest LOS that is possible). In plain language terms, the junction has tipped over the edge of a capacity cliff and is expected to get worse.
- vi) This, together with the 18,000+ AADT figure for the A41, the regularly observed long queues, the observations of residents, and Google Traffic data (see below), all strongly point towards the A41 road link being over-saturated in the peak periods, with very little gap acceptance. Most two-way single carriageway roads will tend to result in low gap acceptance for any priority-controlled side-junctions where two-way peak hour flows reach the 1,900-2,100 level. Low gap acceptance means that traffic waiting at any minor side-arm junctions will struggle to find the requisite gaps to emerge onto the major road.
- vii) Google Traffic suggests that there are slow moving queues past the site access. For example, on a typical Wednesday, it suggests that a queue extend from the North Wales Expressway junction all the way past the site access from 12.55pm to 17.15 pm. This is corroborated by observational data collected by residents nearby which demonstrates that stationary or slow-moving sliver queues regularly extend from the North Wales Expressway up and beyond the junctions to Waverton to the south-east (over a mile away). These observations, taken during the summer holidays when traffic flows are lighter, are attached.

- viii) The modelling does not seem to include an allowance for this, or for the effect of the proposed Toucan crossing that is an inherent part of the proposed design. For example, the number of times in the peak hour the crossing might be used, for the platooning effect (eastbound) and queuing effect (westbound) this will have on A41 traffic flow. This is a significant shortfall.
- ix) Note that this review has not extended to examining the LINSIG results or merge / diverge assessments of the other junctions within the TA study area in any detail. The LINSIG result printouts are not complete and do not include, for example, the phasing or junction diagrams, along with other key information that would be required for a proper audit. Nonetheless, there are user-entered saturation flows of 1,900 for some of the lanes on one junction model, including turning lanes, but with saturation flows derived from the geometric inputs on another junction model. These inconsistencies should be queried.
8. The development features up to 200 dwellings with only a single point of access, serving a c.600m long spine road 6m wide. The means of access is non-reserved matter of the application. No emergency access strategy appears to have been put forward, which includes what would happen if the main spine road were blocked.

The applicants consideration of the flawed Hamburger junction and the A41 capacity limitations, traffic queueing, junction capacity analysis, single point access to the proposed development and the complexity of traffic, cycling and pedestrian movements along, across and at junctions is woefully inadequate and demonstrates a lack of understanding of the importance of

- this trunk road to Wales and the entire North West
- this critical route to school for around half of the children accessing the Christleton High School and Primary school

5 Safety of schoolchildren

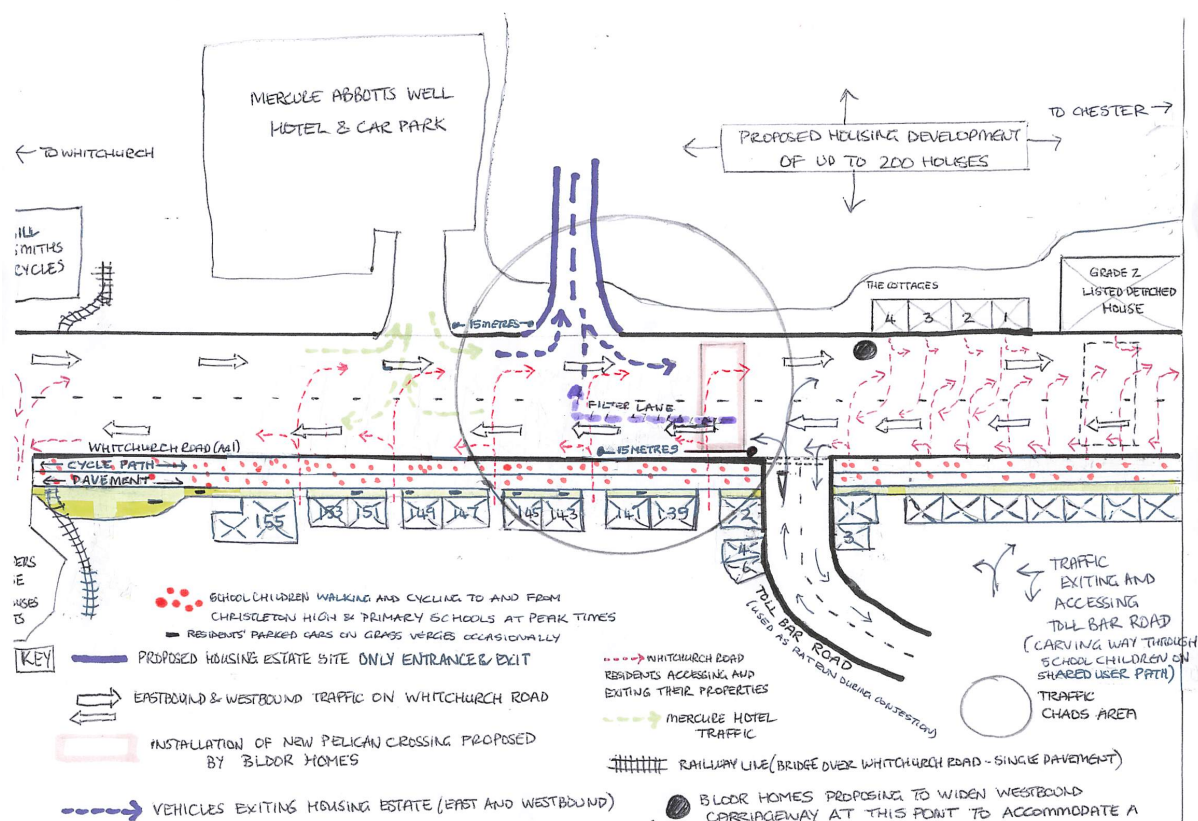
The Parish Council and the High School carried out a Travel Survey in 2021 which was forwarded to CWaC at the time. A copy of the responses can again be provided.

Around a half of the children are from Great Boughton and Huntington

Over a third of all children feel that their routes to school are unsafe and dangerous

The most significant cause is the risk of negotiating the A41 shared user path

The following diagram displays the location of the share user path and the risks adjacent to fast moving traffic south and the vehicles cutting across the shared user path to access and exit Toll Bar Road



The single point access off an already capacity limited A41 trunk road south in the midst the main cycling and walking route to the schools is dangerous. The peak A41 vehicular flows will coincide with stationary traffic north, fast moving traffic south and waves of children cycling and walking to and from the High School and Primary School. The proposed development will increase an already unacceptable serious injury risk to schoolchildren.

6 Sustainability and car dependency

The Climate Change Committee's 2022 Report to Parliament notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 77 and 110 prescribing that significant development should offer a genuine choice of transport modes, and prioritising sustainable transport. Paragraphs 109 and 115 require that appropriate opportunities to promote walking, cycling and public transport should be taken up as part of a visioned approach. The development is car-focussed and does not accord with this required approach. The developers own trip generation matrix shows that very few journeys are expected to be made either walking, cycling or public transport.

Walking and cycling: The layout with a single 600m spine road and a single access means that anyone walking, cycling, or using public transport will have to share the same access and road as general traffic, with no segregated facilities. Walking to existing facilities involves a route along major, polluted and congested roads, and in any case, there are none within the 'desirable' 500m walk distance apart from the Mercure Hotel which will be of limited interest to residents.

The TA uses standard CIHT walk distances, but these do not consider the deterrent of having to use the A41 with heavy traffic and then crossing hostile road junctions. While pedestrians and cyclists could theoretically use the traffic-free Canal to get to the city centre, it is still necessary to travel up to 800m to access it, and then it provides an indirect, inconvenient routes with awkward unsafe onward access points to city centre destinations.

Buses: The site is only served by the hourly service 41 with no Sunday Service. The main destination is the city centre, and other potential destinations are inaccessible, including the rail station.

Trains: The rail station is 4km from the centre of the site. It is just not credible that '*multi-modal journeys by bus and train could become a 'genuine choice' for future residents.*

The developer (TA8.18) suggests that '*A service frequency enhancement for the no.41 bus which links to Chester Railway Station could also be provided if deemed necessary by CWaC Highways*'. This suggests a lack of confidence that an hourly service (with no service on Sunday) is a reasonable level of service. We suggest that **an improvement of this sort would be essential** – to bring the service up to two buses per hour all day, including on Sunday should the development go ahead.

Cycling and walking routes across the Hamburger junction are only an acceptable risk to competent and experienced cyclists – only some adults and children qualify. The thought that bus use can have any impact on the A41 traffic and queueing is frankly ridiculous. Hence continued car and HGV use of the A41 will ensure that the road remains gridlocked and any substantial developments, like this planning proposal with access on and off the A41, are not sustainable.

7 Agricultural Land

The development will lead to the loss of 10ha of grade 2 (very good) and 3a (good quality) farmland. This is 'best and most versatile' agricultural land. The applicants' statement suggests that '*this must be considered in the surrounding context. There are vast areas of high-quality agricultural land across the borough.*' Of course, the amount of farmland available elsewhere is completely irrelevant.

The loss of 10ha of the best and most versatile farmland is an absolute loss and must be weighed in the planning balance against the development.

8 Air Quality

The applicant has provided an Air Quality Assessment (AQA) which concludes that the impacts of the proposed development on NO₂, PM₁₀, and PM_{2.5} concentrations are negligible on all receptors. We do not agree with the conclusions, which do not consider several factors.

The A41 carries more than 18,000 vehicles a day and queues for around a mile from the Hamburg junction to Waverton several times twice a day. The NO₂ and PM_{2.5} on this section of road is worse than 77% of the Chester AQMA which stops the other side of the hamburger Junction.

The regular stops and starts in the traffic flow from vehicular access to and from the development will increase A41 queue lengths and stationary traffic and reduce average vehicles speeds. This will increase Nox and particulate pollution from engines. The additional stopping

and starting will increase particulates from brakes and engine parts. This is now a significant source of particulates and is also produced by hybrid and electric cars.

Christleton and Littleton Parish Councils have an Air Quality Working Group. Their latest report shows that CWaC fixed monitor measurements exceed the WHO and UK limit for NO₂ of 40ug/m³ in 3 out of five consecutive years on the A41 and for two consecutive years on the A51. It monitored air quality from the A51 through the centre of Christleton to the A41 using a handheld Plume device which measures NO₂, PM₁₀ and 2.5. This indicated that that PM₁₀ and PM_{2.5} concentrations are multiples of the guideline levels at peak times.

Independent evidence shows that:

DEFRA – 6.9-8.3mg/m³ – average 7.6mg/m³

IMPERIAL COLLEGE – 9.3-10.3mg/m³ – average 9.8mg/m³

WHO LIMIT 5mg/m³

For every 1mg/m³ increase in PM_{2.5} the risk of heart failure rises by 7% and stroke risk rose by 3%. So, for an average exposure of 9mg/m³ there is a 28% increase in heart failure risk and a 12% increase in stroke risk.

Pollution levels along the A41 through Christleton Village centre to the A51 are comparable to those in major urban areas such as Bolton, Bournemouth, Leicester, Edinburgh, Manchester, Newcastle, Liverpool, and Bristol.

Pollution from construction traffic is also a concern. Site preparation and building could last 3-4 years, a significant period during which air quality will be affected. The only access for construction traffic is from the A41 opposite the Toll Bar Road junction and the cut through traffic flows into a traffic queue, will materially increase NO₂ and PM_{2.5} pollution.

If this development is approved, there will be an increase in NO₂ and PM_{2.5} fine particle pollution which will continue to affect the lungs and cardiovascular systems of children and vulnerable adults in Christleton and Littleton, increasing the risk of strokes, heart disease, lung cancer, asthma, and respiratory infections.

9 Housing need

Christleton Parish Council commissioned Community action to carry out the following Housing Needs Survey which is summarised below – a copy is already lodged with CWaC

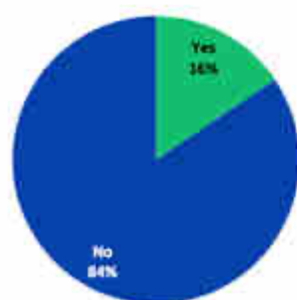
The table below shows a summary of the overall results to the survey.

Survey Summary	Total Number	% of Households
Total surveys distributed	1,283	100%
Total surveys returned	310	24%
Total needing homes in Christleton and Littleton Parishes	64	5%
Total demand for affordable housing from the survey	12	1%

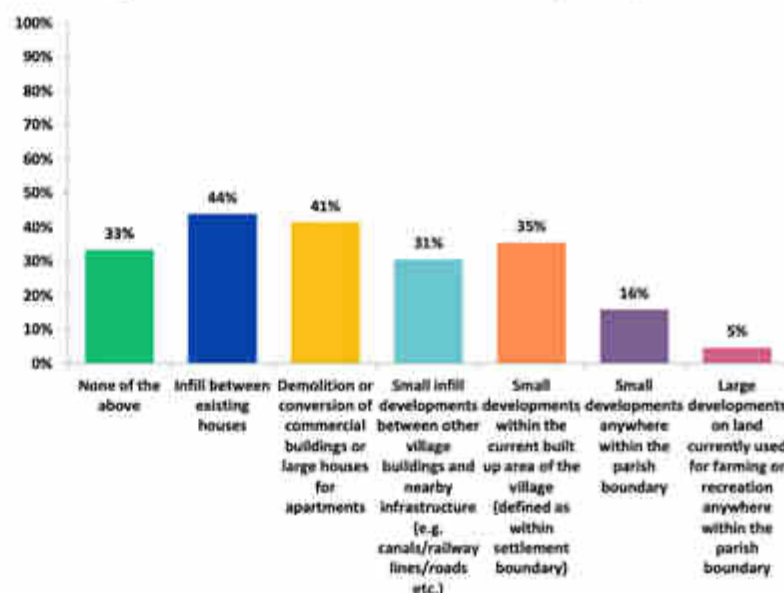
Property Type	Affordable housing need		Estimated supply		Shortfall (-) / Surplus (+)
	Housing register need (2023)	Christleton and Littleton Survey – demand for affordable tenures (March 2024)	Pipeline planning permissions – affordable units	Re-lets of existing stock (annual average)	Housing register and survey needs minus estimated supply
1 Bed	36	1	4	1	-32
2 Bed	23	7	4	2	-24
3 Bed	13	2	1	<1	-13
4+ Bed	5	2	1	0	-6
Total	77	12	10	4	-75

The limitations of the current highways network and the damaging air quality effects on the health of residents (Appendix 2) led the Parish Council to conclude that new housing should be limited to the local needs of residents. There is no growth anticipated in local employment. As only 3 of those on the housing register have a local connection the housing need on the date of the survey was only 12+3 = 15 houses. The proposed development is not required

Q26: Are you in favour of new housing being built in the Christleton and Littleton Green Belt?



Q27: If new housing is to be built in the Christleton and Littleton Green Belt, which of the following locations do you believe are acceptable?



10 Conclusion and Recommendation

In summary, the application for up to 200 dwellings at Land at Whitchurch Road, Christleton fundamentally contravenes current national guidance and adopted local plan policies for Green and Grey Belt, traffic, safety of schoolchildren, sustainability, and environmental protection. In addition, with the borough currently undergoing a Local Plan review, granting permission now would risk undermining the plan-making process and public trust in spatial decision-making. This development should be located where there is a growth in employment or a regeneration requirement. We request an opportunity to address the planning committee at the determination of this application – please could you record this request and advise the appropriate registration

CHRISTLETON PARISH COUNCIL

