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Report on the Blacon Community Neighbourhood Plan 2025 – 2040

An Examination undertaken for Cheshire West & Chester Council with the support of the Blacon Neighbourhood Alliance on the October 2025 submission version of the Plan.

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Date of Report: 8 May 2026

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Main Findings - Executive Summary

From my examination of the Blacon Community Neighbourhood Plan and its supporting documentation, including the representations made, I have concluded that subject to the policy modifications set out in this report, the Plan meets the Basic Conditions.

I have also concluded that:

- the Plan has been prepared and submitted for examination by a qualifying body – Blacon Neighbourhood Alliance;
- the Plan has been prepared for an area properly designated – map on Page 2 of the Plan;
- the Plan specifies the period to which it is to take effect – 2025 - 2040; and
- the policies relate to the development and use of land for a designated neighbourhood area.

I recommend that the Plan, once modified, proceeds to referendum on the basis that it has met all the relevant legal requirements.

I have considered whether the referendum area should extend beyond the designated area to which the Plan relates and have concluded that it should not.

1. Introduction and Background

Blacon Community Neighbourhood Plan 2025 - 2040

- 1.1 Blacon is an unparished area to the northwest of Chester that lies within the administrative area of Cheshire West & Chester Council. The Blacon Community Neighbourhood Plan 2025 – 2040 has been prepared by the Blacon Neighbourhood Alliance which has the status of a neighbourhood forum. As well as the Plan, a complementary Neighbourhood Development Order (NDO) has been produced which I am examining separately.
- 1.2 The Plan states that the area was chosen to cover all the built-up area of Blacon, a small area of land off the Parkgate Road roundabout and the open land between Blacon and the commercial areas off Sealand Road. The western boundary of the Neighbourhood Area is part of the border between England and Wales. The city of Chester lies generally to the southeast.
- 1.3 Designation as a neighbourhood area by Cheshire West & Chester Council was granted on 22 August 2023. Since then, work has progressed under the auspices of a steering group with assistance being given by planning consultants. The resultant plan is comparatively short having a vision, four objectives and four policies. The policies address a sports and

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community hub building at Cairns Crescent (the subject of the NDO), community facilities, the Western Avenue local retail centre and Local Green Spaces.

The Independent Examiner

- 1.4 As the Plan has now reached the examination stage, I have been appointed as the examiner of the Blacon Community Neighbourhood Plan 2025 - 2040 by Cheshire West & Chester Council with the agreement of Blacon Neighbourhood Alliance.
- 1.5 I am a chartered town planner and former government Planning Inspector with over fifty years' experience. I have worked in both the public and the private sectors. I am an independent examiner and do not have an interest in any of the land that may be affected by the draft Plan.

The Scope of the Examination

- 1.6 As the independent examiner I am required to produce this report and recommend either:
- (a) that the neighbourhood plan is submitted to a referendum without changes; or
 - (b) that modifications are made and that the modified neighbourhood plan is submitted to a referendum; or
 - (c) that the neighbourhood plan does not proceed to a referendum on the basis that it does not meet the necessary legal requirements.
- 1.7 The scope of the examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) ("the 1990 Act"). The examiner must consider:
- Whether the plan meets the Basic Conditions;
 - Whether the plan complies with provisions under s.38A and s.38B of the Planning and Compulsory Purchase Act 2004 (as amended) ("the 2004 Act"). These are:
 - it has been prepared and submitted for examination by a qualifying body, for an area that has been properly designated by the local planning authority;
 - it sets out policies in relation to the development and use of land;
 - it specifies the period during which it has effect;
 - it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area;

- it does not include provisions and policies for “excluded development”¹;
 - it is designed to secure that the development and use of land in the neighbourhood area contribute to the mitigation of, and adaptation to, climate change²; and
 - it takes account of any local nature recovery strategy, under Section 104 of the Environment Act 2021, that relates to all or part of the neighbourhood area.³
- Whether the referendum boundary should be extended beyond the designated area should the plan proceed to referendum.
 - Such matters as prescribed in the Neighbourhood Planning (General) Regulations 2012 (as amended) (“the 2012 Regulations”).

1.8 I have considered only matters that fall within Paragraph 8(1) of Schedule 4B to the 1990 Act, with one exception. That is the requirement that the Plan is compatible with the Human Rights Convention.

The Basic Conditions

- 1.9 The “Basic Conditions” are set out in Paragraph 8(2) of Schedule 4B to the 1990 Act. In order to meet the Basic Conditions, the neighbourhood plan must:
- have regard to national policies and advice contained in guidance issued by the Secretary of State;
 - contribute to the achievement of sustainable development;
 - not result in the development plan for the area of the authority proposing that less housing is provided by means of development taking place in that area than if the neighbourhood development plan were not to be made⁴;

¹ The meaning of ‘excluded development’ is set out in s.61K of the 1990 Act.

² This additional requirement was commenced on 25 March 2026 by virtue of *The Levelling-up and Regeneration Act 2023 (Commencement No. 11 and Saving and Transitional Provisions) Regulations 2026*, which brought into force Section 98 of the Levelling-up and Regeneration Act 2023.

³ See footnote above.

⁴ This Basic Condition applies from 25 March 2026 by virtue of *The Levelling-up and Regeneration Act 2023 (Commencement No. 11 and Saving and Transitional Provisions) Regulations 2026*, which brought into force Section 99 of the Levelling-up and Regeneration Act 2023. This replaces the former Basic Condition which required a neighbourhood plan to be in general conformity with the strategic policies of the development plan for the area.

- be compatible with, and not breach, assimilated obligations⁵; and
- meet prescribed conditions and comply with prescribed matters.

1.10 Regulation 32 of the 2012 Regulations prescribes a further Basic Condition for a neighbourhood plan. This requires that the making of the Neighbourhood Development Plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.⁶

2. Approach to the Examination

Planning Policy Context

- 2.1 The Development Plan for this part of Cheshire West & Chester Council is the Local Plan (Part 1) Strategic Policies, adopted in January 2015, and the Local Plan (Part 2) Land Allocations and Detailed Policies, adopted on 18 July 2019.
- 2.2 Planning policy for England is set out principally in the National Planning Policy Framework (NPPF). The Planning Practice Guidance (PPG) offers guidance on how this policy should be implemented.

Submitted Documents

- 2.3 I have considered all policy, guidance and other reference documents I consider relevant to the examination, including those submitted which comprise:
- the draft Blacon Community Neighbourhood Plan 2025 - 2040, October 2025;
 - a map which identifies the area to which the proposed Neighbourhood Development Plan relates;
 - the Consultation Statement, October 2025;
 - the Basic Conditions Statement, October 2025;
 - Blacon Green Spaces, October 2025;
 - all the representations that have been made in accordance with the Regulation 16 consultation;
 - the Strategic Environmental Assessment (SEA), Habitats Regulations Assessment (HRA) and Marine Plan Screening Determination, November 2025, prepared by Cheshire West & Chester Council;
 - the request for additional clarification sought in my letter dated 19 February 2026, and the responses from Cheshire West & Chester

⁵ See: The Retained EU Law (Revocation and Reform) Act 2023 (Consequential Amendment) Regulations 2023, which replaced the previous reference to 'EU' obligations.

⁶ This revised Basic Condition came into force on 28 December 2018 through the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018.

Council dated 3 March 2026 and from the Blacon Neighbourhood Alliance of 12 March 2026; and

- the responses to my letter of 16 March 2026 concerning the revisions to the legal compliance and Basic Conditions requirements from Cheshire West & Chester Council, from the Blacon Community Alliance and from four other parties who took the opportunity to comment.⁷

Site Visit

- 2.4 I made an unaccompanied site visit to the Neighbourhood Plan Area on 22 March 2026 to familiarise myself with it and visit relevant sites and areas referenced in the Plan and evidential documents.

Written Representations with or without Public Hearing

- 2.5 This examination has been dealt with by written representations. I considered hearing sessions to be unnecessary as the consultation responses clearly articulated the objections to the Plan and presented arguments for and against the Plan's suitability to proceed to a referendum.

Modifications

- 2.6 Where necessary, I have recommended modifications to the Plan (**PMs**) in this report in order that it meets the Basic Conditions and other legal requirements. For ease of reference, I have listed these modifications separately in the Appendix.

3. Procedural Compliance and Human Rights

Qualifying Body and Neighbourhood Plan Area

- 3.1 The Blacon Community Neighbourhood Plan has been prepared and submitted for examination by a qualifying body, which is the Blacon Neighbourhood Alliance. Both the Neighbourhood Area and Neighbourhood Forum were designated by Cheshire West & Chester Council on 22 August 2023.
- 3.2 It is the only Neighbourhood Plan for the Blacon Neighbourhood Area and does not relate to land outside the designated Neighbourhood Plan Area.

⁷ View documents at:

[https://planningpolicy.cheshirewestandchester.gov.uk/neighbourhood-planning/blacon-
np](https://planningpolicy.cheshirewestandchester.gov.uk/neighbourhood-planning/blacon-
np)

Plan Period

- 3.3 The Plan specifies clearly the period to which it is to take effect, which is from 2025 – 2040.

Neighbourhood Plan Preparation and Consultation

- 3.4 Details of both the Neighbourhood Plan and Order preparation, and consultation, are set out in the Alliance’s Consultation Statement dated October 2025. As noted above, the designation of Blacon as a neighbourhood area was approved by Cheshire West & Chester Council on 22 August 2023, along with the designation of Blacon Neighbourhood Alliance as a neighbourhood forum. The Plan and Order process was then progressed by a working group, meeting monthly over a period of two years and assisted by planning consultants.
- 3.5 A wide range of consultation and engagement techniques have been involved. Early on in the process, in November 2023, a young people’s survey was launched. This was followed, in 2024, by a major community-wide online survey with publicity through letters and emails, leaflets and posters. A stall was manned at the Blacon Festival and a stakeholder workshop and community information event also held.
- 3.6 Formal consultation under Regulation 14 took place between 25 March 2025 and 5 May 2025. The period was subsequently extended until 22 July 2025 because of an error in notifying some of the statutory consultees. Some 72 responses were received from the local community, statutory consultees and various other organisations, split evenly between representations on the Neighbourhood Plan and those relating to the Neighbourhood Development Order.⁸
- 3.7 The majority of the representations from the community were supportive of the proposals. Details of persons and bodies consulted are detailed in Section 4 of the Consultation Statement. Section 4, together with various appendices, also gives an explanation and illustration of how consultation took place. A summary of the main issues and concerns that were raised is contained in Section 5 of the Consultation Statement and in Appendix 8. A description of how the representations were considered and addressed is also set out in Section 5 and in Appendix 8.
- 3.8 Regulation 16 consultation on the Neighbourhood Development Order was undertaken by Cheshire West & Chester Council between 11 December 2025 and 30 January 2026. 13 responses were received, in combination commenting on the Neighbourhood Plan and Neighbourhood Development Order.

⁸ See paragraph 1.1 above.

- 3.9 During the examination, changes were made to the legal compliance requirements and Basic Conditions, applying from 25 March 2026.⁹ In order to provide an opportunity for the Blacon Community Alliance, Cheshire West & Chester Council and any other interested parties to comment, the local planning authority contacted those who had made representations at the Regulation 16 stage.
- 3.10 A two-week period was advertised by Cheshire West & Chester Council on its website inviting further comments, focused only on the legislative changes. Six responses were received, including those from Cheshire West & Chester Council and the Blacon Community Alliance. I have taken these into account in my assessment.
- 3.11 I am satisfied that, at both the Regulation 14 and the Regulation 16 stages, the consultation process met the legal requirements and there has been procedural compliance. Regard has been paid to the advice on plan preparation and engagement in the PPG.

Development and Use of Land

- 3.12 The Plan sets out policies in relation to the development and use of land in accordance with Section 38A of the 2004 Act and does not exceed the appropriate scope of a neighbourhood plan.¹⁰

Excluded Development

- 3.13 The Plan does not include provisions and policies for “excluded development”.

Local Nature Recovery Strategy

- 3.14 The Blacon Neighbourhood Alliance considers¹¹ that the Neighbourhood Plan is consistent with the new Cheshire Local Nature Recovery Strategy (Section 104 of the Environment Act 2021). Cheshire West & Chester Council does not have any further comments in this regard. From my assessment, I am not aware of any direct conflict with the strategy.

Climate Change

- 3.15 Having regard to the responses received to my letter of 16 March 2026, I am satisfied that, overall, the Plan policies do not conflict with the aims of securing development which contributes to the mitigation of, and adaptation to, climate change.

⁹ See paragraphs 1.7 – 1.9 above and the associated footnotes.

¹⁰ See s.38B(A1) and s.38B(2C)(a) of the 2004 Act.

¹¹ Email dated 24 March 2026.

Human Rights

3.16 The Blacon Community Alliance is satisfied that the Plan does not breach Human Rights (within the meaning of the Human Rights Act 1998). From my independent assessment, I see no reason to disagree.

4. Compliance with the Basic Conditions

Assimilated Obligations

- 4.1 The Neighbourhood Plan was screened for Strategic Environmental Assessment (SEA) by Cheshire West & Chester Council, which found that it was unnecessary to undertake SEA. Having read the Strategic Environmental Assessment Screening Determination, I support this conclusion.
- 4.2 The Blacon Community Neighbourhood Plan was further screened for Habitats Regulations Assessment (HRA), which also was not triggered. The site is not in close proximity to a European designated nature site. In an email dated 11 December 2025, Natural England agreed with this conclusion. From my independent assessment of this matter, I have no reason to disagree.

Main Issues

- 4.3 Having regard to the Blacon Community Neighbourhood Plan, the consultation responses and other evidence, and the site visit, I consider that there are four main issues relating to the Basic Conditions for this examination. These concern:
- Sports and Community Hub Building
 - Community Facilities
 - Western Avenue Local Retail Centre
 - Local Green Spaces
- 4.4 Before I deal with the main issues, I have a few observations to make with regard to the representations. First, the Blacon Community Neighbourhood Plan should be seen in the context of the wider planning system. This includes the Local Plan as well as the NPPF and PPG. It is not necessary to repeat, in the Neighbourhood Plan, matters that are quite adequately dealt with elsewhere.¹² Having said that, there may be scope to give emphasis to matters particularly relevant in the context of Blacon.

¹² See NPPF Paragraph 16 f).

- 4.5 Secondly, the Neighbourhood Plan does not have to deal with each and every topic raised through the consultation. In this regard, the content of the Neighbourhood Plan and the scope of the policies is largely at the discretion of the qualifying body, albeit informed by the consultation process and the requirements set by the Basic Conditions.
- 4.6 Thirdly, my central task is to judge whether the Neighbourhood Plan satisfies the Basic Conditions. Many of the representations do not demonstrate or indicate a failure to meet those conditions or other legal requirements. Similarly, many of the suggested additions and improvements are not necessary when judged against the Basic Conditions, notwithstanding their potential utility.
- 4.7 The following section of my report sets out modifications that are necessary in order to meet the Basic Conditions. Some of the proposed modifications are factual corrections.¹³ Others are necessary in order to have closer regard to national policies and advice. In particular, plans should be succinct and contain policies that are clearly written and unambiguous.¹⁴ A decision maker should be able to apply them consistently and with confidence when determining planning applications. In addition, the policies should be supported by appropriate evidence.¹⁵

Issue 1 – Sports and Community Hub Building

- 4.8 Policy BLACON1 offers specific support to the provision of a sports and community hub building at Cairns Crescent, Blacon. This begs the question of whether the proposal is acceptable in principle, bearing in mind measures to safeguard against the loss of playing fields, to ensure the provision of sustainable drainage and to ensure the safety and free flow of traffic as a result of adequate parking provision.
- 4.9 Cheshire West & Chester Council has strategic policies which cover all these matters. Whilst general conformity with such strategic policies is no longer a Basic Condition, the matters are, nevertheless, important issues and I have considered them accordingly.
- 4.10 As a general principal, I agree that the loss of playing fields should be avoided. Given the provisions of Policy BLACON1, read in conjunction with the detail provided in the Neighbourhood Development Order, it is clear that an area of playing field would be lost to the proposed hub development. Cheshire West & Chester Council is concerned about what would be a net loss of playing field land including the loss of a five-a-side-type football pitch (said to be in poor condition and not well-used throughout the year¹⁶).

¹³ Modifications for the purpose of correcting errors is provided for in Paragraph 10(3)(e) of Schedule 4B to the 1990 Act.

¹⁴ NPPF, Paragraphs 15 and 16 d).

¹⁵ PPG Reference ID: 41-041-20140306.

¹⁶ See the Community Alliance's answers of 12 March 2026 to my questions.

- 4.11 I can see that almost half of one of two full-sized football pitches would be lost to the built development. However, through a reorganisation of the available space, it would still be possible to provide two full-sized pitches. In addition, five-a-side-type football could be accommodated within the hub although it is not intended to be a like-for-like replacement.
- 4.12 A wider consideration is whether the benefits of the proposal would clearly outweigh any loss. This is reflected in the NPPF at Paragraph 104 c). In this regard, I am aware of widespread public support for a project which I can see would be a major asset to the local community. Bearing in mind also the relatively small loss of playing fields, the opportunities provided by the hub building itself and the clear overall public benefit, I find that the proposal is acceptable in this regard.
- 4.13 In terms of sustainable drainage (SuDS and foul water drainage), the Alliance has commented as follows:
- The Feasibility Study identified the flood risks associated with the land and indicated there is no obvious reason why a satisfactory sustainable drainage system and foul water system cannot be delivered. The precise arrangements will be determined once the business plan and detailed building specification have been agreed as part of discharging Condition 5.¹⁷*
- 4.14 For my part, I appreciate that the precise arrangements can only be determined once the hub design has been progressed. However, from what I have seen and read, I see no reason why acceptable arrangements cannot be brought forward.
- 4.15 As to car parking, Cheshire West & Chester Council has stated:
- Based on the information provided, it would appear that 64 parking spaces could potentially be provided on the site, and this could be sufficient for a development of this type in this location. Any overspill would be likely to be for small periods and unlikely to generate a level of harm which would amount to a conflict with local and national policy. However, as set out above - it is difficult to be certain on this due to the lack of certainty about the proposed development, uses and proposed level of parking provision.¹⁸*
- 4.16 In my experience, I would not expect the levels of generated traffic to cause unacceptable problems on the local highway network. In terms of car parking, I accept that the proposed provision is below the maximum number that is indicated in the Council's car parking standards. However, for the most part, I can envisage that there is unlikely to be a serious clash between the timing of football matches and peak use of the hub building for other purposes.

¹⁷ See the Community Alliance's answers of 12 March 2026 to my questions.

¹⁸ See response dated 3 March 2026 to my questions.

- 4.17 In addition, I note the site's excellent location relative to the community and the opportunities for walking to the facilities. All in all, I have no overriding concerns regarding on-site car parking.
- 4.18 As to the detailed provisions in Policy BLACON1, there is one matter that needs to be addressed. The second bullet point of the policy refers to changing rooms "that meet the required standards". In this regard, it is not clear what are the required standards. For the applicant, it needs to be clear where those standards are to be found.
- 4.19 In the response of the Neighbourhood Alliance to my questions¹⁹, I have been referred to the NDO and suggested Condition 7. This simply refers to "Football Foundation standards". A link to a specific document is required and is the subject of proposed modification **PM1**.

Issue 2 – Community Facilities

- 4.20 Policy BLACON2 concerns community facilities. These are listed in the policy and shown (but not numbered) on the Policies Map. For anyone unfamiliar with the area, it is not easy to identify which facility is which. For clarity, the community facilities on the Policies Map should be numbered in accordance with the numbering of the facilities in the policy. Proposed modification **PM2** refers.

Issue 3 – Western Avenue Local Retail Centre

- 4.21 The Western Avenue Local Retail Centre is the subject of Policy BLACON3. The centre is described in the policy and in the supporting text. However, it is necessary to refer to the Policies Map for an appreciation of the area to which the policy would apply. Cross-reference to the Policies Map should be included within the policy, for clarity (proposed modification **PM3**).
- 4.22 The supporting text, at Paragraph 3.16, makes reference to Local Plan Policy DM15 as a relevant policy. Policy STRAT11 is also relevant and, as such, has been included within the proposed modification.

Issue 4 – Local Green Spaces

- 4.23 As in Policy BLACON2, the Local Green Spaces to which Policy BLACON4 refers are listed in the policy and shown (but not numbered) on the Policies Map. For anyone unfamiliar with the area, it is not easy to identify which site is which. For clarity, the Local Green Spaces on the Policies Map should be numbered in accordance with the numbering of the sites in the policy.
- 4.24 Information in support of the Local Green Spaces is set out in Appendix A of the Plan. However, there is an error relating to the descriptions of Site

¹⁹ Email of 12 March 2025.

6 (Cranleigh Crescent Green Space) and Site 7 (Graham Road Playing Field). The Blacon Neighbourhood Alliance has supplied replacement text.²⁰ This should be substituted for the related text in the Plan.

- 4.25 With regard to the proposed Local Green Space 12 (Kipling Road), Cheshire West & Chester Council has commented that the site is part of the neighbouring school site and is not publicly accessible at the current time. In this regard, I saw that the site is opposite St Theresa's Catholic Primary School but is not accessible to the general public. However, this is not a prerequisite of designation. The PPG indicates that land could be considered for designation, even if there is no public access.²¹
- 4.26 In other respects, the site is close to the community that it serves, local in character and not an extensive tract of land. More particularly, I can see that the site would be valued as a significant potential community asset. In this regard, as with all the other proposed designations, I am happy that the requirements set out in Paragraph 107 of the NPPF would be met. I am also content that all the sites would be capable of enduring beyond the end of the Plan period (Paragraph 106 of the NPPF). However, other amendments to the policy are necessary as set out in proposed modification **PM4**.

Other Matters

- 4.27 All policy areas have been considered in the foregoing discussion. With the modifications that I have recommended, the Plan would meet the Basic Conditions. Other minor changes (that do not affect the Basic Conditions), including those suggested by Cheshire West & Chester Council as well as consequential amendments, corrections and up-dates, could be made prior to the referendum at the Council and Neighbourhood Alliance's discretion.²²

5. Conclusions

Summary

- 5.1 The Blacon Community Neighbourhood Plan has been duly prepared in compliance with the procedural requirements. My examination has investigated whether the Plan meets the Basic Conditions and other legal requirements for neighbourhood plans. I have had regard for all the responses made following consultation on the Neighbourhood Plan and the evidence documents submitted with it.

²⁰ See the Community Alliance's answers of 12 March 2026 to my questions.

²¹ PPG, Paragraph Reference ID: 37-017-20140306.

²² PPG Reference ID: 41-106-20190509.

- 5.2 I have made recommendations to modify a number of policies and text to ensure the Plan meets the Basic Conditions and other legal requirements. I recommend that the Plan, once modified, proceeds to referendum.

The Referendum and its Area

- 5.3 I have considered whether or not the referendum area should be extended beyond the designated area to which the Plan relates. The Blacon Community Neighbourhood Plan as modified has no policy or proposals which I consider significant enough to have an impact beyond the designated Neighbourhood Plan boundary, requiring the referendum to extend to areas beyond the Plan boundary. I recommend that the boundary for the purposes of any future referendum on the Plan should be the boundary of the designated Neighbourhood Plan Area.

Overview

- 5.4 It is evident that a considerable amount of time and effort has been devoted to the development and production of this Plan and I congratulate those who have been involved. The Plan should prove to be a useful tool for future planning and change in Blacon over the coming years.

Andrew S Freeman

Examiner

Appendix: Modifications

Proposed modification number (PM)	Page no/ other reference	Modification
PM1	Page 8	In the second bullet point of Policy BLACON1, replace “required standards” with “the standards of the Football Foundation”; and provide a link to those standards.
PM2	Page 11	On the Policies Map, number the Community Facilities in accordance with the numbering of the facilities in Policy BLACON2.
PM3	Page 12	At the commencement of Policy BLACON3, add “As shown on the Policies Map”. In Paragraph 3.16, after the first sentence, insert “Local Plan Policy STRAT11 is also relevant.”.
PM4	Page 12	In regard to Policy BLACON4, show the numbering of the Local Green Spaces on the Policies Map. In Appendix A, in regard to Site 6 (Cranleigh Crescent Green Space) and Site 7 (Graham Road Playing Field), substitute the text supplied by the Alliance in its answers of 12 March 2026 to my questions. ²³

²³ https://planningpolicy.cheshirewestandchester.gov.uk/sites/planningpolicy-cheshirewestandchester/files/2026-03/BNA%20Combined%20Response%20to%20Examiner%20Questions_March%202026_Redacted.pdf