

Cheshire East Local Plan Scoping Consultation Response

September 2026

On behalf of Cillarda Group (Holmes Chapel) Ltd
[Redacted]

Increase in Housing Requirements

CEC must ensure it can meet its identified housing needs in full through a realistic and deliverable strategy.

Policy S1 of the NPPF 2026 requires development plans to plan positively for future growth and change and, as a minimum, to seek to meet the development needs of their area. In the absence of an adopted Spatial Development Strategy, this means providing for objectively assessed housing needs, supporting infrastructure and other uses, subject to the limited circumstances identified in national policy. The revised standard method requirement will require the Council to plan positively for a much more significant level of housing growth than previously planned for. The Local Plan should therefore identify a genuinely deliverable and resilient portfolio of locations capable of delivering substantial numbers of homes alongside supporting infrastructure, community facilities and environmental enhancements. This should include appropriate Open Countryside and sustainable settlement-edge locations. Policy HO2 also makes clear that housing requirement figures should reflect the extent to which identified needs can be accommodated over the plan period as a minimum and may appropriately be higher where necessary to reflect wider growth ambitions.

Spatial Development Strategy

It is acknowledged Cheshire East is now part of the Cheshire and Warrington Combined Authority area and will be required to prepare a Spatial Development Strategy (SDS) for Cheshire and Warrington. This is welcomed and presents a positive opportunity for sustainable development in CEC and across the sub-region. Policy PM1 of the NPPF 2026 requires an SDS to set a positive vision for future growth and change at a sub-regional scale and to provide a clear spatial framework for investment and growth. It is further welcomed that the Council acknowledges national policy is clear that local plan preparation should not be delayed.

The Spatial Development Strategy should provide a positive and deliverable framework for meeting the sub-region's development needs and, under Policy PM1, should plan across a period of at least 25 years. Its role is strategic: it should identify the broad distribution and broad locations for growth, while the Local Plan remains the appropriate mechanism for detailed site allocations and locally specific policy. The emerging SDS

should therefore not become a reason for delaying the Cheshire East Local Plan or deferring assessment of sustainable individual sites. Where an SDS housing requirement is subsequently established, Policy HO2 provides that the figure should not be retested through Local Plan preparation unless there has been a significant change in circumstances affecting the overall requirement or its distribution. In the meantime, the Local Plan should progress the evidence, site-selection and allocation work necessary to deliver a positive and resilient strategy.

Supplementary Planning Documents including Design Guide

Cilldara Group (Holmes Chapel) Ltd supports the objective of securing high-quality and locally distinctive development. However, the Council should establish its principal design expectations through a strategic design framework prepared as an integral part of the Local Plan, rather than deferring significant policy requirements to subsequent supplementary guidance.

This is particularly important where design requirements affect density, developable area, housing typologies, parking, landscaping, materials or other matters with cost and viability implications. Establishing these expectations through the Local Plan process would allow them to be tested through whole-plan viability assessment, thereby providing greater certainty that allocated sites can deliver the quantum of development assumed by the Plan.

Any strategic framework should set clear principles while retaining sufficient flexibility for site-specific masterplanning and design codes to respond to local character, site circumstances, market requirements and changing methods of construction over the lifetime of the Plan. Early engagement with housebuilders, landowners and other delivery partners should form part of its preparation. The Council should also have particular regard to Policy PM6 of the NPPF 2026, which requires development plans to avoid policies that duplicate, substantively restate or are inconsistent with national policies for decision-making.

Plan Period

Cilldara Group (Holmes Chapel) Ltd considers that the Council should give careful consideration to whether a plan period longer than the national minimum would provide a more effective long-term strategy. Policy PM2 of the NPPF 2026 requires Local Plans to set out their spatial strategy, minimum development provision, allocations and broad locations for growth for a period of no less than 10 years from adoption. Importantly, national policy expressly allows Local Plans to cover a longer period where this would, for example, support the delivery of longer-term infrastructure or strategic development.

Accordingly, the five-year review mechanism should not be treated as a substitute for selecting an appropriately long planning horizon at the outset. Reviews ensure policies remain effective and up to date; they do not remove the need to plan comprehensively for growth, infrastructure investment and strategic development over a period which reflects local circumstances.

Given the scale of housing growth which Cheshire East will need to accommodate, the lead-in times associated with strategic infrastructure and larger housing sites, and the emerging Cheshire and Warrington SDS with its minimum 25-year strategic horizon, there

is a strong case for a Local Plan period longer than the minimum 10 years where this would improve certainty and delivery. The proposed 15-year period is capable of complying with national policy, but the Council should demonstrate that it is sufficiently long to plan effectively for the full infrastructure and development implications of the strategy and to provide a robust supply of development opportunities throughout the Plan Period.

Planning for Growth

The new Local Plan should plan positively for growth in accordance with Policy S1 of the NPPF 2026 and provide sufficient flexibility to ensure that identified housing needs can be met throughout the plan period. The strategy should be based on realistic assumptions regarding site delivery, infrastructure and market capacity, and should avoid relying on an overly constrained or marginal supply of land. Policy HO3 requires Local Plans to identify a sufficient supply and mix of sites to meet or exceed the housing requirement over the plan period; the Council should therefore build resilience into the strategy rather than plan only to the minimum numerical requirement.

A sufficient range and choice of deliverable and developable sites should be identified across the Borough, including appropriate contingency and flexibility to respond to changing circumstances. This will help to maintain housing delivery, support investment in infrastructure and services, and reduce the risk that the Plan becomes out of date because individual allocations do not progress at the rate anticipated.

Cildara Group has consistently promoted land to the south of Middlewich Road, Holmes Chapel during previous Local Plan consultation stages and a substantial body of technical work already exists which has indicated the Site is capable of early delivery. The new Local Plan process should give appropriate weight and consideration of such sites when considering the deliverability and resilience of available housing land.

Settlement Hierarchy

The settlement hierarchy should be informed by up-to-date evidence of the role and function of settlements, including access to services, employment, public transport and infrastructure. It should provide a framework for directing growth, but should not operate as a rigid ceiling on development where a settlement is capable of accommodating additional sustainable growth.

The Council should consider the capacity of settlements to support new housing and the opportunities for development to sustain local services, facilities and public transport. The hierarchy should therefore be capable of reflecting differences in sustainability and development potential within and between settlements, rather than relying solely on historic classifications.

Where settlements are well located, have an established range of services and facilities, and can accommodate growth without unacceptable impacts, the Local Plan should allow an appropriate scale of development to contribute towards meeting the Borough's housing requirement.

Holmes Chapel is a strong example of why the hierarchy should be applied with sufficient flexibility. It is identified in the adopted Local Plan Strategy as a Local Service Centre and

previous representations described it as one of the larger and more sustainable settlements within that tier, with access to a range of services and facilities comparable in some respects to higher-order centres. Its location close to Junction 18 of the M6 and its connections via the A50 and A54 reinforce its strategic accessibility. Holmes Chapel also benefits from excellent rail connections to Manchester and Crewe which provide greater opportunity to access numerous regional cities and London. The new evidence base should therefore assess the actual role, function and capacity of Holmes Chapel rather than assuming that its historic tier should determine the scale of future growth. In light of Policies S2 and S5 of the NPPF 2026, the Council should also assess opportunities associated with well-connected stations and the relationship of potential sites to Holmes Chapel station. National policy defines reasonable walking distance for these purposes as around 800 metres, or around a 10-minute walk where route conditions, topography or physical barriers make distance alone an inappropriate measure; this should be tested through the evidence base rather than assumed.

Spatial Distribution

The spatial distribution of development should be based on a transparent assessment of sustainability, housing need, infrastructure capacity, deliverability and market considerations. It should ensure that growth is distributed across the Borough in a manner which supports sustainable communities and provides a realistic range and choice of housing sites.

The strategy should not become over-reliant on a small number of large strategic allocations or on an assumption that windfall development will continue to make up any shortfall. A more robust approach is to plan for a genuine margin of flexibility, including a range of smaller and medium-sized deliverable sites in sustainable settlements. This would provide resilience where major sites are delayed, improve market choice and help maintain a consistent trajectory of housing delivery across the plan period. This approach is reinforced by Policy HO6 of the NPPF 2026, which requires Local Plans, unless there are strong reasons otherwise, to allocate land accommodating at least 10% of the housing requirement on sites no larger than one hectare and a further 10% on sites between one and two-and-a-half hectares.

A balanced portfolio of sites across different settlements and market areas will provide greater resilience and help maintain housing delivery throughout the plan period. Policy HO6 also requires Local Plans to allocate sites which support and enhance the vitality of rural communities and enable villages to grow and thrive, especially where this will support local services. This reinforces the need for the spatial strategy to consider sustainable growth opportunities across Cheshire East rather than concentrating delivery in a small number of locations or site types.

Where sustainable opportunities exist at settlement edges, including land currently within the open countryside where release is justified through the plan-making process, these should be assessed consistently alongside brownfield and non-Green Belt alternatives including open countryside locations.

Green Gaps and Settlement Gaps

The approach to Green Gaps and any other policies intended to maintain separation between settlements should be reviewed against Policy S2 of the NPPF 2026. National policy now provides that designations and associated policies safeguarding gaps between settlements should be used only where necessary to maintain the separate identities of settlements and their physical separation, should be no larger than needed to achieve that aim, and should not apply to land in the Green Belt.

The new Local Plan should therefore undertake an evidence-based review of existing Green Gap boundaries rather than automatically rolling forward historic designations. Land should not remain subject to a restrictive gap designation simply because it falls within a wider historic area where development of the particular parcel would not materially undermine settlement identity or physical separation. The review should form part of the site-selection and sustainability appraisal process and should identify whether sustainable development opportunities can be accommodated while retaining the essential function of any justified gap.

Development in Settlements

Policy should support appropriate development within settlements and at sustainable settlement edges where it can be integrated with the existing built form and supported by necessary infrastructure. Settlement boundaries which include open countryside should be reviewed as part of the Local Plan rather than treated as fixed limits based on historic patterns of development.

Development within and adjacent to settlements can make efficient use of existing services and infrastructure, support local shops and facilities and provide opportunities for walking, cycling and public transport. The scale and form of development should respond to local character and site circumstances while making effective use of land.

The Local Plan should provide sufficient flexibility to accommodate windfall, infill, redevelopment and planned settlement-edge growth where proposals are sustainable and do not give rise to unacceptable environmental or infrastructure impacts. This should also apply to open countryside locations where often sites are highly sustainable and well related to the existing settlement.

In this context, land to the south of Middlewich Road should be considered as part of any review of the Holmes Chapel settlement boundary. The site presents a logical extension to the settlement along Middlewich Road, noting the influence of existing and permitted residential development in the locality.

Development in the Open Countryside

The emerging evidence base for the new Local Plan should include an up to date Settlement and Infill Boundaries Review which properly assesses all land adjacent to existing settlements.

The assessment should be transparent, consistent and up to date, and should specifically identify land which falls within the open countryside.

Policies for the open countryside should protect valued landscapes and environmental assets while recognising that countryside policy should not operate as an absolute or undifferentiated constraint on sustainable growth. The NPPF 2026 draws a clear distinction between development within settlements and development outside them. Although Policy S5 is a national decision-making policy rather than a site-allocation policy, it is nevertheless important context for plan preparation because it expressly recognises circumstances in which residential and mixed-use development outside settlements can be acceptable, including development within reasonable walking distance of a well-connected station and development addressing an evidenced unmet need where it is physically well-related to an existing settlement and of a scale capable of being supported by existing or proposed infrastructure. The Local Plan evidence base should therefore distinguish genuinely isolated countryside development from sustainable settlement-edge opportunities.

Where land outside existing settlement boundaries is required to meet identified development needs, the Local Plan should assess opportunities through the site selection and sustainability appraisal process on their merits. Particular consideration should be given to sites that can form logical extensions to settlements, make use of existing or planned infrastructure and establish clear, defensible long-term boundaries. Policy S2 requires the spatial strategy itself to identify settlement boundaries and sites allocated to meet identified housing and other needs. Existing countryside boundaries should therefore be reviewed through the new Plan rather than treated as fixed constraints inherited from the previous strategy.

The Middlewich Road site illustrates the importance of this approach. Although the land is designated as Open Countryside, the Holmes Chapel Settlement Report (ED33) published in 2020 outlined that the Site had not been 'sifted out' as unsuitable for development. The Site lies immediately adjacent to Holmes Chapel and has direct access from the A54. The new Local Plan should therefore assess the Site afresh against up-to-date sustainability, landscape, infrastructure, housing-need and deliverability evidence, rather than treating the existing Open Countryside designation as determinative. Its relationship to the settlement is also directly relevant to the locational principles now reflected in the NPPF 2026 and should be assessed transparently through the Plan's evidence base.

Affordable Housing

Cildara Group (Holmes Chapel) Ltd welcomes the recognition that housing affordability remains a significant challenge across Cheshire East and that housing needs and affordability vary considerably across the borough. While affordable housing delivery since 2010 has been strong, exceeding the Local Plan Strategy requirement does not necessarily mean that current or future needs are being met, particularly for lower-income households and in rural communities where the supply of affordable homes can be especially limited.

The new Local Plan should recognise the important role that suitable development in Open Countryside locations can play in meeting these needs. Such locations can often provide more viable opportunities to deliver affordable housing, particularly where land values and development circumstances allow a greater proportion of affordable homes to be secured while maintaining a deliverable scheme.

The Plan should therefore provide sufficient flexibility for suitable Open Countryside and rural sites to come forward where they can demonstrably meet identified local housing needs, rather than relying predominantly on development within higher-value or more constrained settlements. This should be supported by robust, locally specific evidence on housing need, tenure and development viability.

Housing Mix

Cilldara Group (Holmes Chapel) Ltd supports the preparation of an up-to-date Borough-wide Housing Needs Assessment to inform the new Local Plan. However, the assessment should provide an evidence base rather than establish a rigid requirement for the precise mix of homes to be provided on every residential site.

The appropriate housing mix will vary across Cheshire East according to local housing needs, demographic characteristics, existing housing stock, site characteristics, market demand and the nature and location of the development proposed. Any policy should therefore expressly allow Borough-wide evidence to be applied flexibly at site level, taking account of up-to-date local need and demand, market conditions, site characteristics, development viability and the objective of creating mixed and balanced communities.

This flexibility will also allow developments to respond to changing demographic and market circumstances during the lifetime of the Plan, rather than applying a fixed housing mix derived from evidence which may become increasingly dated.

Housing Standards

Cilldara Group (Holmes Chapel) Ltd supports the delivery of high-quality, energy-efficient homes. However, requirements relating to the technical construction and performance of new homes should remain aligned with national policy and Building Regulations.

The Local Plan should avoid locally specific technical standards which duplicate or conflict with national requirements. However, Policy PM13 of the NPPF 2026 expressly allows certain quantitative standards where the policy tests are met. In relation to energy efficiency, any standard going beyond current or proposed Building Regulations must have a clear and robustly costed rationale demonstrating that it will not adversely affect development viability and deliverability. Any such standard should also be expressed in the form required by national policy. The correct approach is therefore not to rule out enhanced local standards in principle, but to require the Council to demonstrate that any proposed standard is necessary, proportionate, appropriately formulated and viable.

Additional local standards can create duplication and uncertainty, increase development costs and affect housing affordability and delivery. Any requirements proposed through the Local Plan should therefore comply fully with Policy PM13 and be robustly evidenced and reflected cumulatively in the whole-plan viability assessment, alongside affordable housing, infrastructure, biodiversity and other policy obligations. The Plan should also avoid policies which duplicate, substantively restate or conflict with national decision-making policy, consistent with Policy PM6.

Climate Change Adaptation

Cilldara Group (Holmes Chapel) Ltd supports the objective of addressing climate change and ensuring that new development is resilient to future conditions. The Local Plan should focus on matters that are properly addressed through spatial planning, including sustainable locations, green infrastructure, flood risk, landscape, biodiversity and the design of resilient places.

Detailed technical requirements relating to the construction and energy performance of new homes should be framed consistently with the national regulatory and planning policy framework. Where the Council proposes energy-efficiency standards above current or proposed Building Regulations, Policy PM13 of the NPPF 2026 requires a clear and robustly costed rationale demonstrating that there will be no adverse impact on viability and deliverability. Locally specific requirements should therefore be justified by evidence and tested as part of the cumulative whole-plan viability assessment. The Plan should focus its climate-change strategy on matters properly addressed through spatial planning while ensuring any optional technical standards comply with the specific national policy tests.

Jodrell Bank World Heritage Site

Cilldara Group (Holmes Chapel) Ltd recognises the international scientific, historic and heritage importance of Jodrell Bank Observatory, including its Outstanding Universal Value as a World Heritage Site, and supports proportionate and evidence-based measures to safeguard its significance, setting and continued operational effectiveness. This approach is consistent with the NPPF 2026, which provides strong protection for designated heritage assets and, through Policy HE8, requires development affecting a World Heritage Site to pay particular regard to its significance and Outstanding Universal Value, including any contribution made by its setting or buffer zone. However, the geographical extent of the Jodrell Bank consultation area, buffer zone and wider setting encompasses a substantial part of Cheshire East, including established settlements and locations which may otherwise represent sustainable and appropriate opportunities for future growth.

The Council's acknowledgement that further Jodrell Bank Observatory Evidence will be published at subsequent stages of Local Plan preparation is therefore welcomed. This evidence will be important in ensuring that decisions regarding the spatial strategy and the identification of housing and employment allocations are based on a robust and transparent understanding of the nature, geographical extent and significance of potential effects on the Observatory.

In particular, the buffer or consultation zone should not be applied rigidly or treated, in practice, as an exclusion zone within which otherwise sustainable development is presumed to be unacceptable and currently acts as an effective moratorium against development in the Holmes Chapel area. Such an approach would risk unnecessarily constraining sustainable patterns of growth and could have the unintended consequence of directing development towards less sustainable locations. Instead, potential development should be considered on its individual and cumulative effects, having regard to its location, scale and nature, the sensitivity of the Observatory to the particular effects

identified, and the ability for those effects to be avoided or appropriately mitigated through design and other measures.

This is directly relevant to land south of Middlewich Road, which lies towards the periphery of the Jodrell Bank Radio Telescope Consultation Zone. Its location within the consultation zone should not, in itself, establish that the site is unsuitable for development or preclude its consideration as a potential allocation. Rather, the Local Plan evidence base should establish whether development at this location would be capable of giving rise to a material effect on the operational effectiveness or significance of the Observatory and, if so, whether that effect can be satisfactorily addressed through appropriate design and mitigation.

Greater certainty and transparency are therefore required regarding the technical evidence and methodology used to assess potential radio-frequency interference, including the relationship between distance and potential effects; the types, scales and characteristics of development most likely to generate interference; the approach to assessing cumulative effects; and the design, construction and mitigation measures capable of avoiding or reducing effects to acceptable levels.

Where technically possible, the Council should work with Jodrell Bank Observatory and relevant stakeholders to establish and publish clear assessment criteria, development parameters and recognised mitigation measures as part of the Local Plan evidence base. This would enable potential effects to be identified and addressed proactively through site selection and masterplanning, rather than the consultation zone operating as an uncertain or potentially disproportionate constraint at either the plan-making or planning application stage.

Accordingly, the emerging Local Plan should adopt an evidence-led, proportionate and effects-based approach which both affords appropriate protection to Jodrell Bank Observatory and enables sustainable development to come forward where it can be demonstrated that the significance and operational effectiveness of the Observatory would be safeguarded. Policy HE8 of the NPPF 2026 expressly requires assessment of potential cumulative impacts on the significance and attributes of Outstanding Universal Value, while also recognising that not all elements of a World Heritage Site will necessarily contribute to that significance or Outstanding Universal Value. The forthcoming evidence should therefore inform, rather than pre-empt, decisions on the suitability of individual sites within the wider consultation area and should establish clearly which effects, attributes and mitigation measures are relevant to particular locations.