ASTEER
PLANNING

Response to Consultation on the Cheshire East Local Plan Scoping Consultation

On behalf of Barratt David Wilson North West

August 2026

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Prepared By: Hope Bleasdale and Jon Power

Asteer Planning LLP, 3rd Floor, Calico, 53-55 Mosley Street, Manchester, M2 3HQ

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1 INTRODUCTION

1.1 Thank you for providing an opportunity to provide comments on the emerging Cheshire East Council (herein referred to as "CEC" or "the Council") Local Plan Scoping Consultation. As the first formal stage of engagement in the preparation of a new Local Plan for CEC, the Scoping Consultation seeks views on the scope and future content of a of the emerging Plan.

1.2 These representations have been prepared by Asteer Planning LLP ("Asteer"), on behalf of Barratt David Wilson Homes North West ("BDW"). They provide a response to the relevant sections of the Scoping Consultation and seek to inform CEC informing the emerging Local Plan spatial strategy and its approach to land allocations.

1.3 BDW's comments focus on Chapter 5: "The Scope of the New Local Plan", and provides comments on:

- The Local Plan Period;
- Vision and Objectives;
- Planning for Growth;
- Housing;
- Climate and Sustainability; and
- The Evidence Base.

1.4 It is acknowledged that the Scoping Consultation is not site-specific, and is not inviting call for sites submissions. However, for context, BDW has submitted various representations to previous Call for Sites consultations, in 2024 and earlier in 2026; which should be considered as the spatial strategy and approach to land allocations is progressed.

1.5 BDW would welcome ongoing engagement with the Council as the Scoping Consultation responses are considered and the preparation of a new Local Plan is progressed.

2 SCOPING CONSULTATION RESPONSES

2.1 BDW fully support the preparation of a new Local Plan for CEC, which is essential to be able to plan for the future needs of the Borough. Our comments seek ensure that a balanced spatial strategy is pursued, which ensures that the Borough's accessible settlements, particularly in the north of the Borough close to key regional employers, provide the homes required to meet the needs of CEC during the next Plan Period.

2.2 This section provides high level comments on the 'Scope of the New Local Plan', taking into account:

- The National Planning Policy Framework ("NPPF"), published on 17th August 2026; and
- Planning Practice Guidance ("PPG") on Plan-Making, last updated 27th November 2025.

Local Plan Period

2.3 CEC is proposing that the new Local Plan covers the period to 31st March 2045, which allows for a 15 year period with a modest buffer based on adoption expected in March 2029. Whilst this is in line with PPG for plan making and the new NPPF Policy PM2 (1)(b), which are framed as a minimum requirement, rather than a maximum. The NPPF recognises that *"Local plans can cover a longer time period where this would, for example, help support the delivery of longer-term infrastructure or strategic development"* (Policy PM2 (1) (b)).

2.4 BDW considers that the plan period should, as a minimum, extend to 2050. This would provide a more appropriate and resilient framework for planning for the Borough's longer-term growth, whilst allowing a reasonable degree of contingency should there be any slippage in the plan-making, examination or adoption process. Given the inherently long-term nature of strategic planning and the significant lead-in times associated with the delivery of housing, infrastructure and other strategic development, a longer plan period would enable CEC to take a more proactive and genuinely long-term approach to meeting the Borough's future development needs. In particular, it would provide greater certainty for the identification and delivery of strategic sites and the infrastructure required to support them.

2.5 Furthermore, a longer plan period would also assist in maintaining a robust pipeline of deliverable sites. This is particularly important where larger strategic sites may take several years to negotiate the planning, infrastructure and delivery stages; and where delivery rates may fluctuate over the course of the plan period. Providing for growth to 2050 would reduce the risk of the Council failing to be able to provide an adequate supply of land for housing and employment uses during the plan period, and would provide greater certainty to landowners, developers, infrastructure providers and the local community.

Creating a Vision and Objectives

2.6 BDW considers that the vision for the new Local Plan should provide a clear, positive and ambitious framework for how CEC will develop over the plan period and beyond. The new NPPF expressly requires the vision to have particular regard to meeting the identified development needs of the area in a sustainable manner (Policy PM2 (1)(a)(iv)). It also requires the vision to articulate how the area should change over the plan period, set aspirational aims and objectives which are underpinned by a realistic appreciation of what the plan can genuinely shape and deliver, and reflect longer-term expectations beyond the plan period where appropriate, including for large-scale development proposals.

2.7 Against this background, the vision should place a clear emphasis on positively planning for and meeting CEC's identified housing, employment and infrastructure needs. This should provide a proactive framework for identifying where and how sustainable growth will be delivered, in the context the "broad locations for growth and regeneration" that have "the potential for significant new homes, jobs and other development" which will be identified through the Cheshire and Warrington Spatial Development Strategy ("SDS"), as required by the revised NPPF (Policy PM1b).

2.8 This is particularly important given that the emerging Local Plan is being prepared alongside the Cheshire and Warrington SDS. The Local Plan should therefore be prepared proactively and in a manner which both responds to and helps shape the emerging SDS, by identifying opportunities within Cheshire East which can make a positive contribution to meeting the area's wider development needs, rather than relying on the SDS to identify all strategic growth opportunities.

2.9 BDW considers that the vision should also recognise the importance of directing growth towards locations which are well-connected, well-related to existing settlements (in accordance with the emphasis placed on this in Policy S5 of the new NPPF) and capable of delivering wider social, economic and environmental benefits. This is particularly relevant to the growth in the north of the Borough, where development can support the vitality and long-term sustainability of existing settlements and improve the balance between homes and key employment generators in the north of the Borough (such as Alderley Park, the Cheshire Science Corridor, Manchester Airport and Manchester City Centre) – which should be balanced against the growth opportunities presented in the south of the Borough.

2.10 Overall BDW considers that the vision and objectives should be ambitious, proactive and delivery-focussed, recognising the scale of growth that Cheshire East will need to accommodate and the opportunities that this presents.

Planning for Growth

Identifying and Assessing Sites

2.11 BDW consider that the site identification and selection process should be informed by a clear, transparent and robust set of criteria, applied consistently and objectively to all sites and potential growth locations. The methodology should provide sufficient flexibility to recognise the different characteristics and opportunities presented by individual sites and settlements.

2.12 BDW considers that the assessment criteria should include:

- **Accessibility and connectivity,** including the site's accessibility by public transport, walking and cycling, its proximity to existing and planned transport infrastructure, and the potential to improve sustainable transport connections as part of development.

- **Access to services and facilities,** including proximity to schools, shops, healthcare, community facilities, employment opportunities and other services, together with the potential for development to improve access to or support the viability of existing facilities.

- **Relationship with existing settlements,** including the physical and functional relationship of the site with the settlement, opportunities for integration with the existing built form, and whether development would represent a logical extension to the settlement.

- **The potential to create sustainable patterns of development,** including whether the site can support a mix of uses, appropriate densities and a sustainable distribution of homes, employment, services, open space and community facilities.

- **Green Belt and Grey Belt considerations,** including the contribution made to the purposes of the Green Belt, and, where applicable, whether land constitutes Grey Belt.

- **Contribution to employment and economic growth,** including the site's relationship to key employment locations, existing commuting patterns and labour markets, and its potential to support a better alignment between housing and employment.

- **Deliverability,** including land availability, ownership, viability, likely delivery rates, site capacity, infrastructure requirements and any other factors which could affect the site's ability to contribute to housing delivery over the plan period.

- **Physical and environmental constraints,** including flood risk, drainage, ground conditions, ecology, contamination, air quality, noise and other physical constraints, together with the scope for mitigation.

- **Landscape and visual considerations,** including the site's landscape character, sensitivity and capacity to accommodate change, recognising that landscape impacts should be considered alongside the potential for good design and appropriate mitigation.

- **Green infrastructure and biodiversity enhancement opportunities,** including the potential to provide new or enhanced open space, play facilities, green corridors, walking and cycling routes, tree planting and other multifunctional green infrastructure.

- **Community benefits and place-making**, including the ability of development to deliver significant benefits for existing and future residents, support existing services and facilities, provide new community infrastructure and create well-designed, sustainable and inclusive places.

- **The potential for comprehensive and strategic development,** including whether a site can form part of a wider strategic growth location and whether development at an appropriate scale could deliver infrastructure, services, affordable housing, open space and other benefits which may not be achievable through smaller sites.

2.13 As stated previously, BDW has submitted various representations to previous Call for Sites consultations, in 2024 and earlier in 2026; and respectfully request that these are considered as the site assessment process is undertaken.

Green Belt

2.14 BDW supports CEC's proposal to undertake a borough-wide Green Belt assessment to identify Grey Belt land and to inform future decisions regarding the potential release of Green Belt land. Given the scale of housing needs that the new Local Plan is required to address, it is important that the Council undertakes a comprehensive and objective assessment of Green Belt land to ensure that all reasonable opportunities for sustainable development are identified.

2.15 BDW also supports CEC's intention to refer to and apply national Green Belt policy in the emerging Local Plan. The assessment should be undertaken in accordance with the new NPPF (Policies GB1 to GB8 and Annex E) and in particular, should clearly identify land that falls within the definition of Grey Belt to ensure that such land is properly considered through the wider site selection process. The findings of the Green Belt assessment should be considered alongside the emerging housing and employment requirements and the full range of reasonable spatial strategy options.

Strategic Green Gap

2.16 BDW recommends that the future approach to potential Strategic Green Gaps has regard to the contribution that land makes to the purposes of designated Green Gaps. Sites which do not make a meaningful contribution to maintaining the separation and distinct identity of settlements, or which only make a limited contribution to the purposes of the

Green Gap, should not be treated as presenting the same level of constraint as land which makes a substantive contribution. The site selection process should therefore assess the actual function and contribution of the land to the purposes of the Green Gap, rather than applying a blanket approach based solely on its designation.

2.17 BDW therefore recommends that any future Strategic Green Gap approach should clearly identify the contribution made by individual parcels of land, maintaining sufficient flexibility to distinguish between areas which are fundamental to maintaining settlement separation. Where sites do not make a meaningful contribution to the Green Gap, they should be removed from this designation as part of the emerging Local Plan.

Settlement Hierarchy

2.18 BDW supports CEC's intention to collect evidence to inform a review of the settlement hierarchy in the new plan. The settlement hierarchy should be based on the current and future role and function of settlements, with consideration of the range, scale and accessibility of services and facilities, proximity to employment opportunities, public transport connectivity, relationship with surrounding settlements, housing and employment markets and the potential for settlements to accommodate sustainable growth.

2.19 BDW considers that the settlement hierarchy and spatial strategy should recognise that principal settlements are generally best placed to accommodate significant levels of sustainable growth due to their scale, range of services and facilities, employment opportunities, infrastructure and transport connections. Directing an appropriate proportion of growth towards these settlements can help support and enhance existing services and infrastructure, improve connectivity and reduce the need to travel, whilst also strengthening their role as sustainable centres. The evidence base should therefore identify the capacity and potential of principal settlements to accommodate growth, including opportunities for larger-scale development and the infrastructure required to support it, and this should be a key consideration in determining the future spatial distribution of development.

2.20 Along with growth in principal settlements, BDW emphasise that where a settlement has the capacity to accommodate sustainable growth and development can support its services, facilities, infrastructure and connectivity, this should be recognised within the

settlement hierarchy and spatial strategy – and an elevation of settlements that can accommodate large scale growth and infrastructure should be considered.

2.21 The assessment should also have regard to the functional relationships between settlements, including commuting patterns, travel-to-work areas, transport connections and shared services and facilities. This is particularly important in assessing settlements which may have a strong functional relationship with larger employment and service centres despite having a smaller population or a lower position within the existing settlement hierarchy.

2.22 Therefore, BDW supports CEC preparing an evidence-led settlement hierarchy which recognises future potential, which can provide a framework for directing growth towards settlements where development can be accommodated sustainably and can contribute positively to their long-term vitality and resilience.

Spatial Distribution

2.23 BDW supports the recognition that the Local Plan will need to consider a range of locations and development forms in determining the most appropriate distribution of growth across the Borough. BDW considers that the spatial strategy should provide for a balanced and sustainable distribution of development across the Borough, based on a robust assessment of housing and employment needs, infrastructure capacity, settlement function, accessibility, commuting patterns and the potential for development to support the long-term sustainability of existing settlements.

2.24 BDW considers that the spatial strategy should continue to place particular emphasis on directing a significant proportion of future growth towards the Borough's principal settlements. These settlements are generally the most sustainable locations for accommodating growth, given their scale, range of services and facilities, employment opportunities, transport connections and existing infrastructure. The spatial strategy should therefore ensure that the potential of principal settlements to accommodate both incremental and larger-scale sustainable growth is fully recognised when determining the overall distribution of housing and employment development across the Borough.

2.25 BDW considers that particular regard should be given to the north of the Borough as part of this balanced approach. The northern part of Cheshire East has strong functional and economic relationships with Greater Manchester and the northern Cheshire employment

arc, including significant levels of commuting to Manchester and surrounding employment locations. The spatial strategy should therefore recognise these existing travel-to-work patterns when considering where future housing growth should be located.

2.26 Furthermore, access to rail services should be an important consideration in the distribution of growth. The revised NPPF places increased emphasis on directing development towards locations which are well-connected by public transport, and in particular railway stations (Policy S5). This approach is particularly relevant to locations in the north of the Borough which have established rail connections to Manchester, which is a significant employment location in the Borough. The Council should consider the potential for growth in such locations to support the wider objectives of reducing car dependency, increasing sustainable travel, improving access to employment and making more effective use of existing transport infrastructure.

2.27 The spatial strategy should also consider the potential for development to strengthen existing settlements and supporting the long-term vitality and sustainability by increasing the population using local services and facilities, and where appropriate, providing the critical mass necessary to support new or enhanced infrastructure and community facilities.

2.28 BDW considers that this is particularly important when assessing potential strategic urban extensions. Larger-scale development can provide opportunities to deliver infrastructure and place-making benefits which may not be achievable through dispersed smaller sites, including new schools and community facilities, affordable housing, sustainable transport improvements, accessible green space, biodiversity enhancements and improvements to existing infrastructure.

2.29 Overall, BDW considers that the spatial strategy should seek to locate development where people can access jobs, services and facilities sustainably, whilst supporting the long-term vitality of existing settlements and making effective use of existing and planned infrastructure. A balanced distribution of growth, including an appropriate level of growth in the north of CEC and particularly in locations with strong rail connectivity and links to Manchester's employment market and key employment nodes in the north, would make an important contribution towards achieving these objectives.

Housing

Housing Need

2.30 The most up-to-date Local Housing Need figure for CEC is 2,424 dwellings per annum ("dpa") which is significantly higher than the adopted figure of 1,800 dpa (and more than double the previous Local Housing Need of 977 dpa). Therefore, the emerging Local Plan will have to accommodate a significantly increased housing requirement whilst ensuring that sufficient deliverable sites are allocated to maintain a robust housing land supply and delivery throughout the plan period.

2.31 The importance of identifying a robust supply of housing is reinforced by the Council's Housing Monitoring Update which confirms that CEC cannot currently demonstrate a five year housing land supply, with a 3.3 year supply. This highlights the need for the emerging Local Plan to provide a resilient and flexible portfolio of allocations capable of maintaining a demonstrable five-year housing land supply on adoption and throughout the lifetime of the Plan. Doing so will provide greater certainty for communities, developers and infrastructure providers, whilst reducing; the reliance on, and effects from, the unplanned nature of speculative planning applications arising from an insufficient supply of housing land.

2.32 Overall, BDW supports CEC undertaking an up-to-date Housing Needs Assessment to identify the key housing issues that the Local Plan will need to address, and planning positively for meeting housing needs with a balanced portfolio of allocations including both strategic urban extensions and smaller, sustainable sites, to ensure that housing delivery is resilient and responsive throughout the Plan period.

Affordable Housing

2.33 Alongside the overall housing requirement, addressing affordable housing needs represents one of the Borough's most significant challenges. As part of the evidence base for the current Local Plan, the Issues Paper identified that the median house price affordability ratio in the Borough was 8.14, increasing from 5.8 in the five years between 2018 and 2023. The Strategic Housing Market Assessment ("SHMA") Update (2013) identified an annual net shortfall of 1,401 affordable homes, which represents a significant proportion of the housing needs for the Borough.

2.34 A lack of housing will result in further constraints on supply and increasing house prices, restricting the ability of first-time buyers to enter the market and further exacerbating the demographic disparities. This inability to accommodate for a working-age population results in a lack of support for the local economy and a decline of local services and facilities, as well as limiting the pool of available staff for local employers.

2.35 As affordable housing is principally delivered through market-led residential development, the Plan will need to allocate a sufficient number of viable housing sites capable of delivering affordable homes alongside market housing.

Housing Mix and Standards

2.36 BDW supports the opportunity identified by CEC to review and update the housing mix policies within the emerging Local Plan. BDW considers that a flexible approach should be implemented, which enables development to respond to local needs rather than having a 'one-size-fits-all' approach across the Borough. BDW considers that a flexible policy approach to housing mix will enable sites to be brought forward that:

- Reflect local circumstances in different parts of the Borough;
- Respond to market demand when sites are brought forward for development; and
- Enable changes in population, preference or demographics to be taken into account throughout the Plan period.

2.37 As part of this, BDW recommends that the new Local Plan should supersede and update the Cheshire East Borough Residential Design Guide SPD which was adopted in 2017.

Climate Change Adaptation

2.38 BDW supports CEC's ambition to ensure that new development is resilient to the impacts of climate change and incorporates measures such as passive design, natural ventilation, sustainable drainage, climate-resilient landscaping, water efficiency and renewable / low-carbon technologies.

2.39 However, the Local Plan should recognise that the ability to deliver these measures is intrinsically linked to the viability and deliverability. Requirements should therefore be proportionate, clearly evidenced through a whole-plan viability assessment and should be sufficiently flexible to respond to site-specific circumstances.

2.40 BDW is committed to building energy-efficient homes, using thermally efficient insulation and argon-filled double glazing as standard. BDW have showcased their latest technology and construction methods for building zero carbon homes through the Zed House in Manchester and have committed that all their homes will be zero carbon by 2030.

2.41 Therefore, BDW considers that the Local Plan should create the conditions to enable the delivery of high-quality, energy-efficient and climate-resilient homes, at scale. Allocating viable and deliverable sites is fundamental to achieving the Local Plan's environmental objectives: without a sufficient supply of sites capable of coming forward, the ability to deliver innovative low-carbon homes at scale will be further constrained.

Evidence Base

2.42 BDW supports the Council's intention to develop a comprehensive and up-to-date evidence base to underpin the new Local Plan. In addition to those identified, BDW suggests that the Council also identifies the following key evidence base documents:

- **Green Belt Assessment** – (the need for an up-to-date assessment is identified in the Green Belt section above so assume it's omission in the list is a mistake) an up-to-date assessment should be undertaken to inform the strategic review of Green Belt land and ensure that site selection is based on current evidence and the latest NPPF.

- **Open Space Assessment** – a comprehensive and current assessment of open space provision, quality, accessibility and deficiencies should inform decisions on the protection of existing open space and the provision required through new development.

- **Landscape Character Assessment/Appraisal** – an updated assessment should reflect current landscape character, sensitivity and capacity to accommodate development and should be used consistently in site assessment and the spatial strategy.

3 SUMMARY AND CONCLUSIONS

3.1 In summary, BDW considers that the new Local Plan provides a generational opportunity to plan for the future of Cheshire East and should adopt a pro-growth approach to deliver homes to address the significant housing needs of the Borough, alleviate affordability issues and support economic growth during the next 20 years.

3.2 It is critical that CEC pursue a balanced approach to allocating a range of sites, including strategic urban extensions and smaller sustainable sites, to address the full range of housing needs and underpin a robust housing supply. This should include an apportionment of growth to the northern settlements of the Borough, where the need for housing and the affordability crisis is acute, and where new residents will support the economic growth of the Borough's northern employment arc. There should also be a particular focus on locations with access to rail stations, in line with the policies presented in the recently revised NPPF, and particularly where they have the capacity for significant growth.

3.3 BDW would welcome engagement with the Council on these representations or on the sites specifically, and this can be arranged by Asteer.