Response to Consultation on the Cheshire East Local Plan Scoping Consultation

On behalf of PH Property Holdings Ltd

September 2026

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1 INTRODUCTION

1.1 Asteer Planning LLP ("Asteer"), on behalf of PH Property Holdings ("PH") welcomes the opportunity to comment on Cheshire East Council's ("CEC" or "the Council") Local Plan Scoping Consultation.

1.2 PH supports the preparation of a new Local Plan for Cheshire East, recognising the importance of having an up-to-date planning framework capable of responding effectively to the Borough's future needs. These representations respond to the relevant matters identified within the Scoping Consultation. In particular, they seek to assist the Council in developing an appropriate spatial strategy and establishing a robust approach to the identification and allocation of land through the emerging Local Plan.

1.3 PH representations are principally focused on Chapter 5, "The Scope of the New Local Plan", and address the following matters:

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

1.4 The comments have been informed by the relevant national planning policy and guidance, including:

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

1.5 PH acknowledges that the current Scoping Consultation focuses on the scope and content of the emerging Local Plan rather than the consideration of individual sites. Nevertheless, PH has previously made submissions to the Council's Call for Sites, which should be taken into account as the Council develops its preferred spatial strategy and considers the approach to future land allocations.

1.6 PH welcomes engagement with the Council as it considers responses to the Scoping Consultation and progresses with the preparation of the new Local Plan.

2 LOCAL PLAN PERIOD

2.1 The proposed timetable sets out that the new Local Plan covers the period to 31st March 2045, which allows for a 15 year period based on an anticipated adoption date of March 2029, with a small allowance for the plan-making process.

2.2 PH principal comment on the Local Plan period is that it should be extended to 2050, to allow for a more robust and adaptable framework for addressing the Borough's longer-term development requirements, whilst also providing contingency in the event of delays to plan preparation, examination or adoption; and to the large scale infrastructure requirements (and their lead-in times) associated with major strategic development). It is acknowledged that the 15 year period is consistent with the requirements of the PPG and the new NPPF, but it is emphasised in national policy that these requirements are established as a minimum plan period with the potential to extend beyond this where this would assist in supporting the delivery of longer-term infrastructure or strategic development (NPPF Policy PM2 (1)(b)).

2.3 An extended plan period would help to ensure that CEC maintains a sufficient and resilient supply of deliverable development sites throughout the lifetime of the plan. Planning for growth through to 2050 would reduce the likelihood of the Council encountering a shortfall in available land for housing and employment during the plan period. It would also provide increased certainty and confidence for landowners, developers, infrastructure providers and local communities in relation to the long-term development strategy for the Borough.

3 CREATING A VISION AND OBJECTIVES

3.1 PH considers that the new Local Plan should establish a clear and positive framework for accommodating growth both during and beyond the plan period. The NPPF (2026) specifically requires the Local Plan vision to have *"particular regard to meeting the identified development needs of an area in a sustainable manner in accordance with policy S1"* (Policy PM2 (1)(a)(iv)). Therefore, in accordance with this, the vision should be centred on meeting the Borough's development needs.

3.2 Given the parallel preparation of the Local Plan and Cheshire and Warrington Spatial Development Strategy ("SDS"), CEC should ensure that its Plan is proactive and complementary to the emerging sub-regional SDS. The Local Plan should not simply respond to locations identified through the SDS, but should also identify opportunities within Cheshire East that could contribute to meeting both local and wider development requirements.

3.3 Overall PH considers that the vision and objectives should be ambitious, proactive and focussed on delivery, providing a positive response to the scale of growth facing Cheshire East and ensuring that the Plan maximises the opportunities arising from that growth.

4 PLANNING FOR GROWTH

Identifying and Assessing Sites

4.1 PH supports the Council's intention to undertake a comprehensive and transparent assessment of potential development sites to ensure that sufficient land is identified to meet Cheshire East's housing and employment requirements. The site selection process should, however, be sufficiently flexible to consider the full range of opportunities available and should not unduly restrict the potential contribution of sites based on overly prescriptive criteria at an early stage.

4.2 The emerging land availability assessment methodology should assess sites against the established principles of suitability, availability and deliverability, alongside their contribution to the Council's wider spatial strategy and sustainability objectives. In particular, PH considers that the following matters should inform the assessment and subsequent site selection process:

Green Belt and grey belt

4.3 Where sites are located within the Green Belt, the assessment should be undertaken in accordance with the 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. Given the scale of CEC's housing requirement and current housing land supply position, it is considered that a significant quantum of grey belt land will need to be identified.

Location and relationship to settlements

4.4 The location of a site should be a fundamental consideration, with greater weight given to sites that are well related to existing settlements, particularly those that can form logical extensions to established urban areas and benefit from existing services, facilities, employment opportunities and infrastructure. This should be underpinned by a balanced spatial approach to growth across the Borough, which supports growth in principal settlements in both the north and south of the Borough; as well as in Local Service Centres (such as Prestbury) and smaller settlements (such as Peover, Higher Poynton and Henbury) where proportionate growth is required to support future vitality.

Sustainability and accessibility

4.5 Site selection should have regard to the principles of sustainable development and should consider the extent to which sites can be served by, and provide convenient access to, public transport, walking and cycling networks. The availability of local services, facilities

and employment opportunities should also be considered; including where existing services could be improved.

Deliverability and infrastructure

4.6 The methodology should give consideration to land ownership, market attractiveness, infrastructure requirements, planning constraints, and the likely timescales for delivery..

4.7 The assessment should recognise that Policy HO6 requires Planning for a diverse mix of sites and states (with our emphasis in **bold**):

1. ***"To support the provision of a diverse mix of sites, local plans should****:*

   a) ***Allocate land to accommodate at least 10% of the housing requirement on site no larger than one hectare, and a further 10% of sites between one and two and half hectares, unless there are strong reasons why these targets cannot be achieved****; and*

   b) ***Allocate sites which will support and enhance the vitality or rural communities and enable villages to grow and thrive, especially where this will support local services****".*

4.8 PH also considers it important that the methodology allows sites to be considered comparatively, rather than relying on an absolute scoring system. A site with some constraints may represent a more sustainable and deliverable development opportunity than an unconstrained site in a less accessible area. The Council should therefore retain sufficient flexibility to apply professional judgement and consider the overall planning merits of individual sites – and fully consider any information submitted by promoters that supports site assessment.

4.9 The assessment should also recognise the need for a robust and continuous supply of land throughout the plan period. This is particularly important given the varying delivery rates associated with different sites. Sites should therefore be assessed against both their ability to contribute towards short- and medium-term requirements and their potential role in meeting longer-term growth needs.

4.10 Finally, PH supports the Council's intention to provide further opportunities to submit new sites and update existing submissions as the Plan progresses. The methodology should be published in sufficient detail to enable landowners and promoters to understand how sites have been assessed and, where appropriate, to provide additional evidence to address identified constraints. This will help ensure that the eventual site allocation

process is transparent, evidence-led and capable of identifying the most sustainable and deliverable locations for growth.

Green Belt

4.11 PH welcomes CEC's intention to undertake a comprehensive review of the Green Belt across the Borough. Given the level of development that the new Local Plan will need to accommodate, it is essential that the assessment provides a robust and impartial understanding of the role and function of Green Belt land, including the identification of areas that meet the NPPF definition of Grey Belt (Annex 2).

4.12 The outcomes of the Green Belt review should be considered alongside the Council's housing and employment needs, the emerging spatial strategy and the sustainability and deliverability of individual sites. This should include consideration of the relationship between potential Green Belt release and existing settlements, accessibility to services and facilities, transport connections and opportunities to create sustainable patterns of development.

Settlement Hierarchy

4.13 PH supports CEC undertaking an up-to-date review of the settlement hierarchy to help guide the distribution of growth across Cheshire East. The hierarchy should, however, provide sufficient flexibility to recognise the different roles and capacities of individual settlements and should be closely aligned with the principles of sustainable development.

4.14 PH supports an approach whereby a spatial strategy should recognise the important role of Local Service Centres and other rural locations. Appropriate levels of growth should be directed towards these settlements where it is sustainable, suitably located, and proportionate to the scale and function of the settlement. This should include development that is well related to existing built-up areas, makes effective use of existing infrastructure and services, and can help to maintain the vitality and viability of local communities.

4.15 A balanced spatial strategy which allows appropriately scaled growth in Local Service Centres (such as Prestbury) and smaller settlements (such as Peover, Higher Poynton and Henbury) would provide greater flexibility, support local services and facilities, and contribute to meeting housing needs in locations where there are established communities.

4.16 Therefore, PH considers that the emerging spatial strategy should pursue a balanced spatial approach, making provision for a meaningful and appropriate level of growth in

Local Service Centres and other rural locations where this can be demonstrated to be sustainable and logically located. This would provide a more resilient and balanced settlement pattern and ensure that the benefits and opportunities associated with growth are appropriately distributed across Cheshire East.

Spatial Distribution

4.17 PH supports a spatial strategy that considers a range of locations and development forms to achieve a balanced and sustainable distribution of growth across the borough. This should be informed by housing and employment needs, infrastructure capacity, settlement function, accessibility, commuting patterns and the sustainability of existing settlements.

4.18 PH considers that edge of settlement growth should also be considered to support the vitality and sustainability of existing settlements by strengthening the use of local services and facilities and, where appropriate, providing the critical mass to support new or enhanced infrastructure.

4.19 Overall, growth should be directed to locations that provide sustainable access to jobs, services and facilities, support existing settlements and make effective use of infrastructure. There should be a proportionate level of growth across Local Service Local Service Centres (such as Prestbury) and smaller settlements (such as Peover, Higher Poynton and Henbury) .

5 HOUSING

Housing Need

5.1 PH considers that overall housing need is missing from the range of principal housing issues that have been identified for consideration through the Local Plan. CEC have a significantly higher housing need in the emerging Local Plan of 2,424 dwellings per annum ("dpa") compared to the adopted figure of 1,800 dpa, which will be a principal challenge for the Local Plan to address.

5.2 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.

5.3 PH 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

5.4 PH supports that CEC have identified Affordable Housing as a principal issue for consideration through the new Local Plan. However, PH considers that this is intrinsically linked to the point above regarding meeting overall housing needs. Affordable housing is principally delivered through market-led residential development, so 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

5.5 PH supports the opportunity identified by CEC to review and update the housing mix policies within the emerging Local Plan. PH considers that a flexible approach should be implemented, which enables development to respond to local needs rather than having a broad brush approach across the Borough. A flexible policy approach should reflect local

circumstances across the borough, respond to market demands, and remain flexible to changes such as demographic change throughout the Plan period.

6 CLIMATE CHANGE ADAPTATION

6.1 PH 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.

6.2 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.

6.3 PH emphasises that the allocation of viable and deliverable sites is fundamental to achieving the Local Plan's environmental objectives – as without a sufficient supply of sites capable of coming forward, the ability to deliver innovative, low carbon homes at scale will be constrained.

7 EVIDENCE BASE

7.1 PH 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, PH 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.

8 SUMMARY AND CONCLUSIONS

8.1 The new Local Plan represents an important opportunity to shape the long-term future of Cheshire East. PH considers that the Plan should adopt a positive approach to growth, ensuring sufficient housing is delivered to meet the Borough's identified needs, improve affordability and support economic prosperity over the next 20 years.

8.2 A balanced spatial strategy will be essential to delivering sustainable growth across Cheshire East. This should include a focus on the Borough's Local Service Centres (such as Prestbury) and smaller settlements (such as Peover, Higher Poynton and Henbury) where is can support sustainable patters of movement. Distributing growth in this way would support the vitality and long-term sustainability of communities across the Borough, ensuring that settlements of different sizes can benefit from investment, new infrastructure and increased local spending. The distribution of growth should also reflect established employment patterns, access to jobs and services, and evidence of where people want and are likely to live, helping to align new housing with both existing communities and the Borough's wider economic needs.

8.3 PH welcomes the opportunity to continue engaging with CEC on these representations and the specific sites promoted, with further discussions able to be facilitated by Asteer.