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Our Ref: 2025-072

Cheshire East Council
Strategic Planning Team
Delamere House
Delamere Street
Crewe
CW1 2LL

1st September 2026

By email transmission only

Dear Sir / Madam,

Representation on behalf of Hallam Land Management Limited
Cheshire East Council New Local Plan Scoping Consultation
Land at Manor Farm, Alsager

NJL Consulting are instructed by their client, Hallam Land Management Limited ("Hallam"), to make a submission in response to Cheshire East Council's New Local Plan Scoping Consultation, which runs from 21st July 2026 to 1st September 2026. This representation is made in relation to Hallam's interest at land at Manor Farm, Alsager.

This follows from the submission of the Site through the Call for Sites exercise undertaken by Cheshire East Council in March 2026.

Given the early stage of the Local Plan, and the way in which topics are presented at a high level, the responses to the consultation have been organised by topics.

Local Plan Period (Para. 5.1)

It is noted that a 15-year plan period is proposed to support longer-term planning up to **March 2045**, a shorter plan period than the adopted 2017 Local Plan Strategy which extends from 2010 to 2030.

While NPPF Policy PM2 now enables Local Plans to cover 'no less' than 10 years from the point of adoption of the plan, we firmly believe that as a minimum the Local Plan period should run for a **minimum** of 15 years.

In the case of Cheshire East taking forward its next local plan, we consider that the plan period should be more ambitious and strategic in extending beyond this timeframe to a 20-year period for various reasons:

- The Borough's next phases of growth will also require large scale developments to extend existing settlements to meet future housing and economic needs.
- Policy PM2 (Local Plans) of the NPPF states 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*'. A shorter timeframe risks the emerging Local Plan diminishing or missing out on such opportunities for the Borough.
- The importance of the Local Plan having a strategic vision over the longer term, in our view up to 2050, is even more important in the context of the emerging Spatial

Development Strategy where under Policy PM1 (Spatial development strategies) of the NPPF it requires spatial strategies to cover a period of at least 25 years. The current approach would risk being out of step and alignment.

The assertion from the Council that, among other reasons, the 'requirement to review plans every five years supports a shorter timeframe' is not justification in itself given there is nothing within the new regulations on Plan-making to prohibit an authority taking such reviews over a 20-year period and ensuring the adopted Development Plan remains up to date.

Following the above, it is incumbent upon the Council under NPPF PM1 to include strategic sites within the emerging Local Plan to create greater confidence and long-term certainty over the Plan period to achieve longer term policy ambitions relating to growth and infrastructure. Such sites are defined in the NPPF as sites which would be implemented in multiple phases, have significant infrastructure requirements and require a masterplan. For residential led development, the NPPF definition notes strategic sites should 'typically' have capacity for at least 1,500 dwellings.

Given the above, we would strongly recommend that Cheshire East should be targeting a longer Plan period of 20 years.

Spatial Development Strategy (Paras. 3.17 – 3.18)

The consultation notes that the Cheshire East Local Plan is required to be in general conformity with the Spatial Strategy which will be prepared for the Cheshire and Warrington Combined Authority area, but that this should not delay the preparation of the Local Plan.

For the same reasons in response to the new Local Plan period, it is critical that the Local Plan is strategic enough in its own vision over the longer term, in our view up to 2050, to ensure better alignment with the emerging Spatial Development Strategy where under NPPF Policy PM1 (Spatial development strategies) they are required to cover a period of **at least 25 years**.

Given the emerging SDS will act as the spatial framework for investment across the sub region, it is imperative that the emerging Local Plan also considers and identifies long-term growth opportunities and strategic infrastructure priorities such that there is clear alignment between the Local Plan and the emerging SDS. The growth and development around the current Key Service Centres will inevitably form a core component to the strategic ambitions for the emerging Combined Authority (as a whole) and should therefore form a key part of the new Local Plan.

Vision & Objectives (Paras. 5.2 – 5.4)

In order to meet the Council's objective of being 'net zero' (carbon neutral) by 2045, any vision chosen will need to be clear in terms of how this step change is going to be met.

In particular, any vision will need to be set in the context of being able to identify projects and forms of development that can genuinely assist in achieving this objective whilst meeting the housing and employment needs across the Borough, which are diverse given the scale of the Borough.

In order to meet development needs up to 2050, we anticipate there will be a need to expand most existing towns and key settlements and consider the opportunity for new locations for growth in the context of deliverable sites that can offer more in the context of environmental and ecological enhancements.

Large strategic sites, either located in sustainable locations with good access to local services and public transport or of a scale where new services and facilities can be provided near new homes, offer an obvious solution. Indeed, sites where the landholdings can accommodate

physical development alongside the delivery of new habitats, public open space and ultimately net environmental gains that will contribute to the Council's net zero aspirations should be positively considered alongside obvious infill sites within existing urban areas.

Increase in Housing Requirements (Paras. 3.3 – 3.7)

The consultation document identifies that in accordance with National planning policy, Local Planning Authorities are expected to use the standard method figure (2,530dpa) as a starting point when deciding the housing requirements for the local plan. It is also acknowledged that as a starting point the Loal Housing Need figure could be higher, for example 'if it was necessary to meet the needs of neighbouring areas or to support economic growth ambitions or infrastructure investment'.

We fully agree with this sentiment and would urge the Council not to downplay the economic growth opportunities for Cheshire East over the long term given it is uniquely placed to capitalise, on a strategic level, on the National Government devolution agenda, the emerging Cheshire and Warrington Combined Authority, and future thinking and delivery of the proposed Northern Powerhouse Rail.

We would also note, as per comments in response to paragraphs 5.33-5.35 on affordable housing, that the Council should ensure the strategic housing requirement is ambitious enough to achieve the required level of affordable housing in the Plan period. This is a key policy requirement noting the ongoing affordability pressures in the Borough (something which is acknowledged by the Council in Para. 5.33 of the Scoping Consultation Document).

Whilst no specific housing requirement is identified at this stage, it is right that the Council uses the Local Housing Need figure (currently at 2,530dpa) derived from the standard method as the starting point and very minimum for determining the housing requirement in the Local Plan.

Affordable Housing (Paras. 5.33 to 5.35)

The consultation notes that whilst Cheshire East asserts that the delivery of affordable housing has been strong, housing affordability remains a significant challenge in Cheshire East. The latest affordability index for Cheshire East from the March 2026 ONS data release confirms the average household earnings ratio to house price ratio at 7.6 in 2025. This compares to an affordability ratio of 7.4 at the start of the plan period in 2010[1].

While the Council have been able to evidence 'strong' affordable housing compared to the adopted Local Plan Strategy requirement, the remaining affordability pressures firmly indicate that the adopted plan failed in delivering an appropriately ambitious target for affordable housing delivery in the first instance. We would strongly recommend that any updated evidence base, and subsequent policy requirements on affordable housing provision takes this important context fully into account, with the new Local Plan providing the Council with an opportunity to be ambitious to address and remedy this key local issue.

Whilst too early to define what the affordable housing requirement might be at this stage of the Local Plan process (such a process also being the subject of proper viability testing), the evidence would indicate that a more ambitious overall housing requirement could be required to facilitate the step change in affordable housing numbers and address the identified significant challenge of affordability within the Borough.

An updated Housing Needs Assessment is set to be prepared as part of the evidence base, which we fully support.

[1] Office for National Statistics (ONS), released 26 March 2026, ONS website, statistical bulletin, Housing affordability in England and Wales: 2025 – Figure 2 Housing affordability ratio, earnings, and house sales prices by local authority district, England and Wales, 1997 to 2025

Settlement Hierarchy (Paras. 5.20 - 5.23) & Spatial Distribution (Paras. 5.24 - 5.26)

The Scoping Consultation notes that whilst there is no specific requirement in national policy to set a settlement hierarchy, it is a very common approach to do so. For Cheshire East, it is stated that establishing a settlement hierarchy will form an integral part of the future planning strategy to inform the spatial distribution of development, and the approach to site allocations. It is further noted that the evidence base is being updated to inform a review of the settlement hierarchy. This approach is fully supported.

The Scoping Consultation rightly acknowledges that the Local Plan will need to consider a range of options in the distribution of development including opportunities for edge of settlement growth and large-scale urban extensions. This is supported by Policy HO4 (Land for strategic site development) in the NPPF which requires a development plan to identify suitable locations for strategic sites for housing-led development such as significant extensions to existing settlements.

The emerging evidence base is currently being prepared, and therefore whilst not seeking to prejudge the spatial distribution, it is clear that Key Service Centres should continue to perform an important role in meeting the increased housing needs of Cheshire East as within the adopted Local Plan Strategy. Key Service Centres have been integral to achieving the delivery of the Borough's growth through the plan period and more crucially since 2017 reflecting the capability of the settlements to suitably accommodate growth and which in turn supports the vitality and viability of existing facilities and services. Key Service Centres have delivered 48% of housing completions over the Plan period, greater than any other location in the Borough's adopted spatial strategy (Principal Towns – 30%; Local Service Centres – 11%; Other Villages and Rural Areas – 11%)[2].

There will unanswerably be a requirement for significant additional growth within the Key Service Centres, and the Council should be looking for those opportunities in those Key Service Centre locations which can respond to national and local policy requirements and strategic ambitions, where they can best deliver sustainable, integrated growth around the urban area.

Directing significant housing growth to edge of settlement locations as part of a sustainable urban extension of the settlement is wholly appropriate in aligning with the long-term ambition for growth, in locations that are unconstrained by environmental designations (Green Belt and Green Gap), whilst maintaining an appropriate settlement hierarchy.

As a starting point, the Council should also undertake an update of the settlement studies which covered all the settlements within the hierarchy, including the Key Service Centres through the preparation of the Site Allocations and Development Policies Document (SADPD). The purpose of these studies was to inform the SADPD in relation to the site selection process, retail planning, and the consideration of settlement boundaries. The settlement reports were prepared in 2020, and therefore an update to this evidence base should establish the scope for growth within settlement boundaries, the constraints facing each settlement, and determine what changes have taken place linked to the growth that they have accommodated not only to assess how settlements have been enhanced but also how any infrastructure or community facility needs have fallen behind.

We would suggest that the Council also needs to look at the potential of the Key Service Centres in context of sites that are put forward and what these sites might be able to deliver or offer in terms of additional services that would support increased levels of sustainable access and growth within the settlement and further improve the sustainability of that settlement in a joined-up manner. This will therefore provide a sound basis (in terms of evidence base) to determine the most appropriate, and least constrained locations to direct future development.

Alsager in particular is strategically well positioned to be a key contributor to promoting

[2] Cheshire East Annual Monitoring Report 2024/25: Figure 11.6

sustainable patterns of growth to underpin the Council's future Local Plan strategy given its excellent connectivity and links to surrounding key employment areas and sub regional hubs of Crewe and Stoke on Trent.

Conclusion

These representations have been prepared on behalf of Hallam Land Management Limited in response to Cheshire East Council's New Local Plan Scoping Consultation, which runs from 21st July 2026 to 1st September 2026. Hallam have previously engaged with the Council through the emerging plan-making process having submitted representations to the March 2026 Call for Sites exercise in relation to their interests at land at Manor View, Alsager.

These representations have been structured accordingly in response to the direct topics presented in the Scoping Consultation document. In summary, Hallam are in broad agreement on the proposed scope of the emerging Local Plan and engagement strategy for this initial stage, and would wish to note the following key points which, in our view, are particularly important for the emerging Local Plan to have regard to:

- Notwithstanding the emerging Spatial Development Strategy, the Local Plan needs to establish a vision and policy framework that is of a strategic nature in its own right. In our view this should involve a 20 year plan period up to 2050 to better align with the Council's strategic priorities around net-zero, as well the emerging Spatial Development Strategy which will be prepared for the combined authority area over a 25 year period.

- Utilise the standard method figure (currently 2,530dpa) to calculate Local Housing Need as a **starting point** and as the minimum to determine the housing requirements of the Local Plan – the Council are correct in acknowledging that wider growth and infrastructure ambitions may well result in an increase to this requirement;

- The Council should fully consider the housing and economic growth opportunities through the formation of the housing requirement to capitalise on the devolution agenda, the emerging Combined Authority, and proposed infrastructure delivery;

- The Council should consider the allocation of strategic urban extensions, to support the Council's wider growth ambitions, including in the current Key Service Centres which have been integral to achieving the delivery of the Borough's growth through the plan period;

- In seeking to remedy the acknowledged affordability challenges in the Borough, the new Local Plan should consider how the overall housing requirement can facilitate the required step change in affordable housing delivery, balanced this with other evidence around affordable housing needs and viability.

- The Local Plan evidence base should appropriately address cross boundary issues and include updated settlement studies to determine the most appropriate, and least constrained locations to direct future development which is an important context given the emerging Spatial Development Strategy and the formation of the Combined Authority;

- The Council should consider the potential of each existing settlement in context of sites that are put forward and what these sites might be able to deliver or offer in terms of additional services that would support increased levels of sustainable access and growth within the settlement.

We trust these representations are considered as part of the Local Plan preparation and we welcome the opportunity to discuss any of the content (both in regards to the suggested allocation, or general comments regarding the Scoping Consultation) to assist Cheshire East in

producing a sound Local Plan.

Yours sincerely,



Elliott Bullock
Senior Associate Director
On behalf of NJL Consulting