**Response to: Cheshire East Local Plan – Scoping Consultation**

**28 August 2026**
**Sent by email**

## Dear Sir/Madam

### Cheshire East Local Plan – Scoping Consultation

1. Thank you for consulting with the Home Builders Federation (HBF) on the Scoping Consultation for the Cheshire East Local Plan.

2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multinational PLCs, regional developers and small local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales, as well as a large proportion of newly built affordable housing.

3. The HBF would like to submit the following comments in relation to the content of the Scoping Consultation document.

## Changes to National Planning Policy and Plan-Making System

4. It is worth highlighting that following the enactment of the Town and Country Planning (Local Planning) (England) Regulations 2026, a new plan-making system is now in place, and it is under these regulations that the Council is bringing forward its Plan.

5. Alongside this, the Government has now published an updated National Planning Policy Framework (NPPF, 2026) against which the Local Plan will be assessed.

6. Policy PM2 sets out the broad requirements of Local Plans and in particular it highlights that they should set out a positive vision and spatial strategy which supports the delivery of the spatial development strategy for their area and should set out specific proposals for accommodating development needs and conserving and improving the environment at a local level.

## Plan Period

7. The Council's Scoping Consultation document outlines that the new Local Plan will have a plan period of 2029 – 2045. It is envisaged that the Local Plan will be adopted in March 2029 and therefore would have a 16-year plan period at that point in time. This is set against the minimum plan period outlined in the NPPF of 10 years from adoption (Policy PM2).

8. Policy PM2 of the NPPF also outlines that a longer plan period can be considered where this would, for example, help support the delivery of longer-term infrastructure or strategic development. The HBF considers that the Council should maintain a longer plan period for these reasons and also to provide certainty for the development industry to invest in the area. This also acts as a contingency in the event of slippages in timescales.

9. It is also worth noting that the current adopted Local Plan Strategy is now over 9 years old and as an authority, Cheshire East currently is not delivering a sufficient supply of new homes and by its own calculations cannot demonstrate a five year supply of deliverable housing land (currently 3.3 years over the period 2025/26 – 2029/30). The HBF therefore has concerns that by setting the beginning of the plan period at the point of adoption (2029), it ignores the current unmet need that is taking place in Cheshire East. As such, the HBF considers the Council should be setting an earlier start date to its plan period to seek to meet some of this existing shortfall. This should, as a minimum, be from the start of the preparation of the new Local Plan (2026) but consideration could be given to an earlier date.

## Creating a Vision and Objectives

10. The new Local Plan should include a positive approach to housing growth within its Vision and Objectives that should seek to meet the housing needs of current and future residents of Cheshire East in full over the plan period. This should, as a minimum, plan to meet the Council's Local Housing Need (LHN), defined by the Standard Method. For Cheshire East this is currently 2,530 dwellings per annum, although this will need monitoring and updating to take into account changes in housing stock and affordability data.

11. The HBF also requests that the Council fully examines whether there is a need for an uplift to the LHN because of requirements to provide a range and choice of sites, the need for flexibility, viability considerations, alignment of jobs and new homes, unmet need from neighbouring areas, and whether higher levels of market housing are required to secure an increase in the delivery of affordable housing (in line with Policy HO2 of the NPPF). The HBF expects all these aspects to be explored thoroughly through the Council's evidence base.

## Planning for Growth

### *Identifying and Assessing Sites*

12. The HBF does not comment on specific sites but considers that it is imperative that any Land Availability Assessment for housing is prepared in as comprehensive way as possible. This should include an examination of the emerging housing trajectory of the plan to ensure that the Council will be able to demonstrate a five-year supply of deliverable housing land upon adoption of the Local Plan and throughout the plan period. This will prevent issues of land supply being raised later in the plan-making process (e.g. at the Local Plan's examination). The assessment should also be informed by the accompanying Local Plan Viability Assessment to demonstrate those sites identified are in fact viable and deliverable.

13. It is noted that amongst the Council's priorities for the Local Plan is the promotion of brownfield development. Whilst the HBF supports the use of brownfield land, it is considered that, to meet the needs of Cheshire East in full, it is also likely that greenfield sites and suitable land within the Green Belt will need to be identified and allocated. Therefore, when identifying and assessing sites, the Council should be seeking options from all sources (brownfield land, greenfield land, as well as examining Green Belt sites) with the main driver being the overall sustainability and deliverability of the site rather than its status.

### *Green Belt*

14. The HBF supports that the Council is undertaking a borough-wide Green Belt Assessment which will identify grey belt land and help inform any future decisions on potential Green Belt release.

15. As outlined in our response to the section above, in order for Cheshire East to meet its housing needs in full over the plan period, it is highly likely that the Council will need to consider the release of Green Belt land and so undertaking the Green Belt Assessment at this point in the Local Plan's preparation is entirely appropriate. This approach to considering Green Belt release is consistent with the NPPF, where it is clear that exceptional circumstances to examine Green Belt boundaries can include instances where an authority cannot meet its identified need for homes solely on land which is not in the Green Belt and having examined previously developed land and optimising site densities (Policy GB3 of the NPPF).

*Strategic Green Gap*

16. In a similar manner to the approach to Green Belt, the Council should also undertake an assessment of its Strategic Green Gap to establish whether there are any opportunities to identify land for new homes within it in a way that would not fundamentally undermine its role.

*Settlement Hierarchy*

17. The HBF supports the establishment of a settlement hierarchy in Cheshire East, as this can help shape and inform the Council's spatial strategy. The HBF also agrees that the existing settlement hierarchy should be reviewed to establish its effectiveness for the new plan period.

18. Within the Scoping Consultation document, the Council mentions in undertaking this review, it will consider provision of services and facilities, population, jobs, sustainable transport, retail provision and settlement form. The HBF would request that alongside looking at existing facilities, that the Council should also assess settlements based on their future capacity to accommodate further development. This can be done by analysing how future development may be able to enhance the role, function and sustainability of these settlements through improved infrastructure provision and helping to underpin and attract new services and facilities in specific towns and villages.

*Spatial Distribution*

19. The HBF considers that the Council is correct in identifying that a range of factors will influence the distribution of development put forward in the Local Plan. In relation to housing in particular, this should be driven by ensuring the needs of the whole of Cheshire East can be met in full, taking into account specific site and area constraints and the need to secure sustainable patterns of development. This should also be informed and based upon the settlement hierarchy that has been established.

20. Consequently, the HBF agrees with the Council that this will likely result in the need to pursue a range of options including further development within existing settlements, edge of settlement growth, large scale urban extensions and new settlements. In this respect, the HBF would emphasise that the Council should avoid being wedded to any one single option and instead consider a variety of options used in combination.

*Development in Settlements and Development in the Countryside*

21. The way in which development proposals within and outside of settlements should be determined is covered in Policies S4 and S5 of the NPPF and as such, the Council will not need to replicate these in the Local Plan.

22. Nevertheless, the Council will still need to determine what should be classified as 'in settlements' and what should be classified as 'countryside'. In examining this, the HBF considers that the Council should avoid the use of overly restrictive settlement boundaries/development limits which could hamper and stymie future growth options in key settlements over the plan period. For this

reason, the Council should recognise that sites which are adjacent to and well-related to existing settlements may also be sustainable options for growth and meeting housing needs. Therefore, having a more flexible approach to settlement boundaries/development limits will assist boosting windfall development and introduce additional flexibility into the Council's future housing supply.

## Housing

23. The HBF supports the Council in undertaking a Housing Needs Assessment (HNA) and considers that this is a key part of the evidence base of the new Local Plan. It will be important that in translating its outputs into policies, that a degree of flexibility is maintained. We detail this further below.

### *Affordable Housing*

24. For the new Local Plan to be effective, it will need to be clear on the quantum of affordable housing required across different areas of Cheshire East. This will need to be based on an assessment of need from the HNA but also ensure that the requirement is not set at a level which would undermine the deliverability of the Plan (see Policy PM12 of the NPPF). As such, the Council's viability work will also need to assess the appropriate level of affordable housing, taking into account other planning obligations and planning policy costs.

25. It is also anticipated that the HNA will provide an analysis of the types of housing tenure that will be required from development. However, any tenure requirement included in the Local Plan should be flexible in nature to take into account site specific circumstances, characteristics and viability, as well as local requirements of Registered Providers. It will also need to be cognisant of the fact that tenure requirements may shift over the plan period and so any policy will need to be able to react to changing circumstances in the future.

### *Housing Mix*

26. Whilst it is anticipated that the HNA will assess the need for different sizes and types of dwellings to inform the policies of the Local Plan, in a similar way to matters relating to housing tenure, it is important that any recommendations are not translated into policy in an inflexible and rigid way and that the Local Plan should recognise that other site-specific factors will also influence the types of homes that can be accommodated on a site. This includes the site's location and character, market and commercial considerations, as well as matters of viability.

### *Housing for Older People and Specialist Accommodation*

27. Any requirement for specialist housing should be based on robust evidence (see Policy HO1 of the NPPF). Where need is identified, the HBF considers that positively worded policies can be introduced that can encourage such specialist housing where sites and operators are identified. If the Council opts to identify specific sites and allocate them, given that these types of development are highly specialised and have specific operator requirements, then it is imperative that this is done in conjunction with a specific developer or operator so as to avoid allocating sites which the sector simply does not want or cannot deliver.

28. The HBF would recommend avoiding apportioning areas of general needs housing sites to accommodate specialist housing. The operational and locational requirements for specialist housing are very specific and often are not the same as that for general needs housing and without a specific operator on board, there is a significant risk that the site becomes undeliverable. Furthermore, as viability considerations for specialist housing are different to general needs housing, apportioning

an area of a general needs housing site for specialist housing also risks the overall site becoming unviable.

### *Self-build and Custom-build Housing*

29. To help inform the approach to self and custom build housing, the Council will need to assess the need in Cheshire East in line with the requirements set out in the Planning Practice Guidance (PPG, Reference ID: 57-018-20210208).

30. The HBF considers that unless significant demand can be demonstrated, then the Council should not need to identify specific sites for self and custom build homes or require serviced plots on larger market housing sites. Rather the Local Plan should instead seek to create a positively worded policy that can encourage self and custom build housing where such demand is demonstrated. This will also take into account that such demand may not be evenly spread across the authority.

### *Housing Diversification and Providing for Small and Medium Sized Sites*

31. The HBF considers that it is important that the Council identifies and allocates a wide range of housing sites that are different sizes and are in different locations.

32. This includes larger sites which can deliver a significant portion of the area's housing need and do so in a sustainable and holistic manner. Many of the HBF's members who are active in Cheshire East have experience in developing strategic sites and the HBF would encourage the Council to engage with these house builders at an early stage to ensure that any associated policies are shaped in a way to ensure site deliverability.

33. Alongside larger strategic sites, the Council should also identify and allocate smaller sized sites as well (in line with the requirements in Policy HO6 of the NPPF). Whilst larger sites can contribute significantly to meeting the Council's needs over the plan period, such sites often have longer lead-in times and usually require a notable amount of infrastructure to be installed prior to new homes being delivered.

34. By identifying and allocating smaller sites, this allows delivery of homes in the earlier part of the plan period as often such sites have much shorter lead-in times. This will help even out the Council's housing trajectory and avoid housing land supply issues early on in the plan period prior to large strategic sites delivering units.

35. Smaller sites will also ensure a more diverse housing market in Cheshire East, ensuring more choice and competition. To this end, it is important that the Council not only identifies such sites but also ensures that they are allocated. Whilst the Council has highlighted that this would present a challenge for them, the reason why it is needed is that often small and medium house builders struggle to secure developer finance, with banks often needing to assess in detail the risk of lending to such businesses. Having a site allocated provides much more certainty that development can come forward on a site and so assists small and medium builders in obtaining funding.

### *Housing Standards*

36. In the Scoping Consultation document, the Council has committed to exploring whether it should be adopting enhanced standards in relation to:

    - Accessible and adaptable dwellings (Under part M4(2) and M4(3) of the building regulations).
    - Increased water efficiency standards.
    - Nationally Described Space Standards (NDSS)

37. It should be noted that Policy HO5 of the NPPF now requires that no less than 40% of homes on major developments should be delivered to M4(2) standards. Nevertheless, in all instances the Council will need to justify anything over and above this requirement with reference to the relevant tests outlined in the PPG, as well as exploring the viability implications of introducing these standards.

38. Whilst it is understood that standards such as NDSS and accessible dwellings are already found in the existing development plan for Cheshire East, it will still be necessary to review the effectiveness of these policies and establish whether there is still justification for their inclusion and any associated thresholds.

## Transport and Infrastructure

39. The Scoping Consultation document correctly outlines that the approach to transport should be vision-led and seek to promote sustainable travel options. In this regard, where there are opportunities, the Local Plan should seek to promote sustainable transport initiatives and there is clearly potential to provide a strategy which encourages growth where it can support sustainable patterns of development. Nevertheless, it should be acknowledged that the right balance needs to be struck between the shift towards sustainable modes of travel and recognising that for some people the use of private car will remain an essential part of their ability to move around the area and in particular in the more rural areas of Cheshire East.

40. In relation to infrastructure more generally, the Council will need to produce an Infrastructure Delivery Plan (IDP). It is worth highlighting that the development identified in the Local Plan can only be required to mitigate its own impact and cannot be required to address existing deficiencies in infrastructure or services. It is therefore essential for the IDP to clearly show the existing and known deficiencies in the current infrastructure, before reaching any conclusion on the cumulative effects of new development, and any contribution that is needed from new development to mitigate any additional individual and/or cumulative impacts.

41. Therefore, whilst it is appreciated that an IDP is a 'live' document that needs to be updated throughout the plan period, the HBF would nevertheless seek that for the preparation of the Local Plan that it provides as comprehensive list and cost of infrastructure as possible. This is so that it can feed into the Local Plan Viability Assessment and therefore provide an accurate picture of how this may impact on the delivery of development.

## Natural Environment

42. The HBF agrees that the new Local Plan will play an important role in protecting and enhancing the natural environment. It should be noted that many of the requirements in relation to ecology and biodiversity are already enshrined in national legislation, policy and guidance (such as Biodiversity Net Gain, BNG) and this includes the draft NPPF. Consequently, the HBF considers that, as planning policies should not replicate existing national policies (see Policy PM6 of the NPPF), the Council should focus on policies which assist in translating these requirements to a local level to help applicants address the mandatory ecological and biodiversity requirements for their developments.

43. The HBF notes that the Cheshire and Warrington Local Nature Recovery Strategy (LNRS) has now been published. The LNRS will likely play an important role in ensuring development in the Local Plan can contribute towards conserving and enhancing the natural environment and, following recent legislative changes, will also assist in achieving BNG.

## Health and Wellbeing

*Active Travel*

44. The HBF agrees with the benefits of incorporating active travel within new development. Nevertheless, the ability to incorporate the infrastructure that supports active travel (such as those outlined in the Government's Local Transport Note 1/20) will depend on a site's location and its capacity to safely and feasibly incorporate such features. This means whilst it can be encouraged, the Council should stop short of mandating it on all sites as it may not be appropriate in all cases.

## Climate Change

45. The HBF agrees that the Local Plan can play a key role in tackling climate change. However, it considers that the policies of the Local Plan should align with the Government's overall net zero strategy and the national standards that it has set to achieve this policy goal. This is because these standards are universally understood and technically implementable.

46. Over recent years the HBF has worked collaboratively with the Government and other bodies to ensure future homes are as energy efficient as possible to help address climate change. To this end, the Future Homes Standard (with its associated implementation period) was published in March 2026. The WMS that was published alongside the Future Homes Standard (reference: UIN HCWS1445) clearly states:

*"Implementing these standards marks a pivotal step for the sector in our pursuit of net zero. It sets out a clear route towards delivering homes and buildings that are prepared for the future in their enhanced energy efficiency, low carbon heating, and improved protection against overheating. This approach supports the transition to a cleaner, greener built environment, ensuring new homes are 'zero carbon ready' and resilient to the impacts of climate change."*

47. This demonstrates the ambitions of the Government concerning the move towards net zero and this is what should be reflected in the Local Plan.

48. It is also noted that the Scoping Consultation document mentions other associated areas which can help tackle climate change including electric vehicle charging infrastructure, digital infrastructure and embodied carbon.

49. The Council will be aware that matters relating to electric vehicle charging and broadband are already covered by Parts R and S of the building regulations and so will not need to be replicated in the Local Plan (see Policy PM6 and PM13 of the NPPF). With regards to embodied carbon, the HBF considers that measures to address this in construction clearly has merit, however the Government has yet to provide a national standard for measuring and benchmarking this that can apply across all local planning authorities, so that a consistent approach can be followed. As a result of this, the HBF considers that whilst considering embodied carbon could be promoted in the Local Plan, the Council should stop short of requiring a detailed assessment at this time.

## Design

50. The HBF considers that in setting design policies in the new Local Plan, the Council should set the broad parameters of what it considers to be good design for Cheshire East in the policy (aligned to the NPPF and other national guidance) but seek to avoid overly detailed policies, as the specific design of a site will need to be informed by an individual analysis of its constraints and opportunities. The Council should therefore seek to resist a 'one size fits all' approach to design

and whilst previous examples of good design in Cheshire East can be noted, it may not be possible, practical, viable or desirable to simply replicate that on other sites.

51. The HBF agrees with the Council that Design Codes could prove to be a useful tool in setting out clear design expectations for an area or site and ensure a cohesive and coherent design is achieved (as per Policy DP2 of the NPPF). However, the Council should avoid setting Design Codes over too wide an area (such as authority-wide) as this can either lead to homogenisation of design and a loss of local vernacular and character or create a document which is excessively complicated and difficult to implement. Similarly, the Council will need to ensure any Design Codes produced have enough flexibility so that they can address and adapt to changes throughout the lifetime of the development of the area in question and not seek to impose certain design solutions that could stymie innovation.

52. The Council also mentions in the Scoping Consultation document that it is considering the production of a Supplementary Plan or a Design Framework in the Local Plan to establish clear placemaking expectations for new development. Irrespective of which option is chosen, the HBF considers it is important that a consistent approach to design is maintained which takes into account individual site constraints and opportunities and where there are future changes put forward, that any additional costs that may occur from those changes are accurately reflected in the Local Plan Viability Assessment.

## Local Plan Evidence Base

53. The Local Plan Evidence Base listed by the Council appears comprehensive in nature. Of equal importance however is the timing of when these documents are produced. The HBF recommends key documents such as the HNA, Land Availability Assessment, Viability Assessment and IDP are frontloaded as early as possible as these will be vital in shaping how the housing policies of the Local Plan are formulated.

54. More generally, it is important that all these documents are kept up to date throughout the preparation of the Local Plan and any changes to one of these documents is then reflected in the others, so as to create a consistent and coherent evidence base.

## Monitoring

55. The HBF also considers that a dedicated section relating to the monitoring of the policies of the Local Plan is required. This should explain how the plan will be monitored, with the policies, objectives, indicators, triggers and possible actions identified. The HBF recommends that the Council provides details as to how the plan will actually be monitored and identifies when, why and how actions will be taken to address any issues identified.

## Future Engagement

56. We trust that the Council will find these comments useful as it progresses its new Local Plan. We would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

57. The HBF would like to be kept informed of all forthcoming consultations on the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Best regards

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