Turley

1st September 2026

By email only
E: localplan@cheshireeast.gov.uk

Cheshire East Council (Strategic Planning Team)
Delamere House
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Crewe
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Dear Sir/Madam

REPRESENTATIONS TO THE CHESHIRE EAST LOCAL PLAN SCOPING CONSULTATION ON BEHALF OF CASTLE GREEN HOMES

On behalf of our client, Castle Green Homes, we are pleased to enclose representations to the Cheshire East Local Plan Scoping Consultation. Castle Green Homes is currently and has historically been involved in the promotion and delivery of residential development within Cheshire East and it is in this context that these representations are made.

The representations focus on the general direction and scope of the emerging Local Plan. However, for context, Castle Green Homes are currently promoting land off Hassall Road in Alsager which is considered extremely well-placed to contribute towards meeting development needs in the Borough and support the aims of the emerging Local Plan. Castle Green Homes submitted land off Hassall Road, Alsager to the March 2026 Call for Sites exercise (ref: 342). This submission confirmed that the land is available, suitable, achievable and therefore deliverable for residential development (circa 60-70 dwellings). For ease of reference a site boundary and Illustrative Masterplan is contained in Annex 1.

RESPONSE TO SCOPING CONSULTATION

Context for the New Local Plan (Section 3 of the Consultation Document)

Increase in Housing Requirement

Most notably in December 2024**,** and on numerous occasions since then, the Government has identified planning reform as a central mechanism for addressing both the housing crisis and wider economic recovery and growth. The **previous** National Planning Policy Framework (NPPF), published in December 2024, reflected this ambition through articulating the national objective to significantly increase housing delivery, with the new standard method for assessing local housing need forming the *minimum* starting point for plan-making. This is underpinned by a

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national ambition to achieve a combined annual housing delivery target of 370,000 homes. This new standard method has been carried through into the recently revised NPPF, published in August 2026.

This policy direction is integral to the Government's wider "Plan for Change", which includes a commitment to deliver 1.5 million new homes nationally during this Parliament. Planning reform is identified as a critical enabler of this objective, with the NPPF supporting not only new housing but also the economic, physical and social infrastructure necessary for sustainable growth.

These reforms are explicitly framed as necessary to address what the Government describes as a **chronic and long-standing housing shortfall** and support increased economic growth through a more positively prepared and delivery-focused planning system.

The revised NPPF retains the long-established presumption in favour of sustainable development, reinforcing the expectation that local planning authorities should plan positively to meet the identified development needs within their areas through their Local Plans and decision-making processes.

As set out in the Scoping Consultation, the current local housing need figure for Cheshire East is 2,530 dwellings per annum (dpa). This should be treated as a minimum starting point for the emerging Local Plan. This is significantly higher than the adopted housing requirement of 1,800 dpa set out in the CELPS (2017). The emerging Local Plan will therefore need to plan for this materially higher level of housing growth and ensure that sufficient land is allocated to maintain delivery across the full plan period. In this regard, it is unlikely that brownfield opportunities alone will be sufficient to meet long-term development needs. The Plan therefore needs to proactively consider greenfield, grey belt and Green Belt release where necessary as part of a positively prepared strategy for growth. Maintaining a sufficient pipeline of deliverable and developable sites of varying scale and location will be important to support resilience and flexibility in housing delivery over the plan period.

In this context, Castle Green Homes considers that the emerging Local Plan must respond proactively to the materially changed national policy context by planning positively for sustainable growth. This must include:

- Delivering a level of growth that responds positively to updated national policy objectives. In line with the NPPF[1], the new Local Plan should provide for the housing need figure identified by the standard method as a minimum. The preparation of the Local Plan should explore whether the overall housing requirement should be higher than the standard method need figure, in light of the Council's growth ambitions and to reflect planned economic and infrastructure investment in the Borough.[2] The Council should also consider that delivering higher levels of market housing would increase the level of affordable housing delivery achievable, allow unmet need from neighbouring areas to be met, and mean a range of sites can be identified ensuring flexibility in delivery over the plan period.
- Ensuring the evidence base informing the Local Plan fully recognises the diverse characteristics, roles and opportunities of the different parts of Cheshire East such that the spatial strategy in the Local Plan promotes a balanced pattern of growth to support these varying needs and ensure sustainable and inclusive growth across the Borough.

1 NPPF (2026) Policy HO1
2 NPPF (2026) Policy HO2

- Maintaining flexibility within the development strategy to respond to changing needs and economic circumstances.
- Undertaking a robust and evidence-led assessment of greenfield, grey belt and Green Belt opportunities.
- Allocating a range of deliverable, suitable and developable sites capable of contributing across the full plan period.

Spatial Development Strategy

The establishment of new combined authorities, including Cheshire and Warrington Combined Authority and the preparation of a 'Spatial Development Strategy' (SDS) for Cheshire and Warrington, is also expected to increase the focus on coordinated approaches to housing, infrastructure and economic growth at a sub-regional level.

Whilst Castle Green Homes is supportive of the production of this regional level of plan-making and the opportunities it will help to realise for the area, it is essential that the local authorities do not delay the preparation of Local Plans to await the progress of the SDS'. Government guidance unequivocally prioritises the timely production of Local Plans. Castle Green Homes is therefore highly supportive of the recognition in the Consultation Document that the preparation of the Cheshire East Local Plan will not be delayed to await the SDS.

National decision-making policies

Development management policies will need to be consistent with the national decision-making policies contained in the new NPPF. It will be important these do not replicate policies elsewhere or apply standards over and above national standards (such as Future Homes Standards and building regulations). Castle Green Homes welcome the recognition of this in the Consultation Document.

Scope of the New Local Plan (Section 5 of the Consultation Document)

Local Plan Period

Castle Green Homes notes the proposed Local Plan period is 15 years to 31 March 2045. It is acknowledged that, since the publication of the Scoping Consultation, the revised NPPF (August 2026) has reduced the minimum Local Plan Period from 15 to 10 years. However, the scale of the housing requirement for Cheshire East necessitates a comprehensive and long-term assessment of development opportunities across the Borough and the strategic identification of the most appropriate locations for growth. This approach is essential to ensure that future development is sustainable, deliverable and supported by the necessary infrastructure. This is supported by Policy PM2 of the NPPF which states *"local plans can cover a longer time period where this would, for example, help support the delivery of longer-term infrastructure or strategic development."*

In this context, Castle Green Homes supports the Council's proposed 15-year plan period as a minimum. A 15 year plan period allows for the masterplanning and phasing of larger, more strategic sites. A shorter plan period would risk limiting the Council's ability to take a long-term strategic approach to growth, infrastructure investment and place-making, and would reduce certainty for communities, infrastructure providers and the development industry in planning for the Borough's future needs.

Whilst 15 years should be regarded as the minimum plan period, Castle Green Homes considers that the Council should remain open to adopting a longer plan period, particularly where this would facilitate an earlier plan start date. The Council currently proposes a plan period commencing on adoption in 2029; however, this risks failing to adequately address housing needs arising in the intervening years. This concern is reinforced by the Council's acknowledged shortfall in five-year housing land supply, which currently stands at 3.3 years for the period 2025/26 to 2029/30. By extending the overall plan period and adopting an earlier base date, the Local Plan could both respond more effectively to existing and emerging unmet housing needs and retain a forward-looking strategy extending to 2045.

Planning for Growth

Identifying and assessing sites

Castle Green Homes welcome the apparent intention for the Council to consult on the methodology for identifying and assessing appropriate sites for allocation (the 'land availability assessment methodology'). Whilst it is important that the methodology assesses the existing 'baseline' characteristics and constraints of a site, it should also provide sufficient flexibility to consider how the characteristics, context and therefore suitability of a site may be influenced and enhanced through specific development proposals and planned changes to the wider area in the future. This could include for example contributions towards improved public transport, the implementation of landscape enhancement measures or the provision of community facilities as part of a development which may change the conclusion of an assessment when compared with an assessment of purely the existing 'baseline'. This approach would enable a more positive, forward-thinking assessment of development opportunities, recognising the role that development can play in addressing existing constraints and creating sustainable places.

The preparation of the 'Land Availability Assessment' must involve a robust assessment of the anticipated housing trajectory to ensure that a five year supply of deliverable housing sites will be in place from the point of adoption and through the plan period.

Castle Green Homes would urge the Council to consult on the methodology in advance of undertaking the site assessments themselves. Concern is raised that that intention appears to be to consult on the 'land availability assessment methodology' alongside the identification of sites and initial assessments at the same time at the 'plan content and evidence' consultation. Given sites would have already been through the sifting method process at this stage, this would seem too late to allow for meaningful consultation on the methodology itself.

Green Belt

Castle Green Homes welcome the recognition in the Consultation Document that there are likely to be insufficient brownfield sites in the Borough to accommodate development needs over the plan period. Whilst the intention to undertake a Green Belt Assessment is supported, Castle Green Homes also reiterate the requirement established in national policy that before Green Belt land is released for development, local planning authorities should assess whether sufficient suitable sites can be identified outside of the Green Belt.[3]

In the context of Alsager, Green Belt surrounds the settlement to its east. Before exceptional circumstances might exist to justify whether any of this Green Belt land should be released from development, a robust assessment must first be undertaken of whether any of the non-Green Belt, greenfield land to the west of Alsager is suitable.

[3] NPPF (2026) Policy GB3

Land off Hassall Road, adjacent to the north-west of the existing settlement boundary of Alsager represents a sustainable, logical development opportunity well-placed to meet some of Alsager's needs on non-Green Belt land. Castle Green Homes are actively promoting the site and have undertaken due diligence which demonstrates that the land is available, suitable, achievable and therefore deliverable for residential development (circa 60-70 dwellings). Castle Green Homes promoted the Site through the March 2026 Call for Sites exercise (ref: 342). For ease of reference, a site boundary and illustrative masterplan showing how the Site could come forward is now contained in Annex 1. Land off Hassall Road is approximately 2.5 hectares. It is therefore a relatively small site which could deliver early on in the plan period without a requirement for substantial new infrastructure provision. It is imperative that the Local Plan allocates a range of sites, both small medium and large, to ensure choice and flexibility in delivery and avoid over-reliance on a number of large sites. This need to plan for a diverse mix of sites is explicitly recognised in the NPPF.[4]

Settlement Hierarchy

Castle Green Homes would support the establishment of a settlement hierarchy to help guide the strategy and spatial distribution within the Local Plan. The settlement hierarchy should be reviewed as part of the plan preparation process. This review should take account not only of existing facilities and transport connections within a settlement, but the scope for future growth, facilities and connections to alter the role of a settlement within the hierarchy over time.

Alsager is identified as a 'Key Service Centre' within the adopted CELPS (2017). It should continue to be recognised as one of the most sustainable settlements in the Borough in the new Local Plan Settlement Hierarchy.

As recognised in the evidence base[5] informing the CELPS (2017), Alsager has a broad range of community facilities and services, it contains over 3% of the total population and number of households and over 2% of the total jobs in Cheshire East. Alsager is recognised as having a distinct retail role and frequent train and bus services with a number of routes and destinations. It is strategically located within the southern part of the borough, adjacent to Junction 16 of the M6, enabling strong transport connections to Crewe, Newcastle-under-Lyme and the wider sub-regional area.

As an inherently sustainable settlement, Alsager should be expected to accommodate a significant proportion of the development needs in the south of the Borough over the plan period.

Spatial Distribution

The Consultation Document notes that a range of factors will influence the distribution of development, including housing demand and availability, infrastructure capacity and constraints, environmental considerations and the market attractiveness of locations. This is welcomed.

Castle Green Homes agree that the emerging Local Plan is likely to need to consider a range of options in the distribution of development in order identify the most appropriate and sustainable strategy to accommodate the scale of development required. The ultimate spatial strategy will need to include a combination of options including development within existing settlements, edge of settlement growth, large-scale urban extensions and/or new settlements.

Cheshire East is a diverse Borough and the emerging Local Plan and its evidence base should recognise from the start the differing characteristics, function and housing market geographies of its varying areas and communities. In particular, the north of the Borough has close connections to the Greater Manchester conurbation and economy and has a different social and economic profile from the south of the Borough which is centred on Crewe, Nantwich and the surrounding rural areas. Alsager is part of this South Cheshire area, but it also has strong ties to the employment and housing market in North Staffordshire and Stoke-on-Trent.

It is vital that the settlement hierarchy and spatial distribution of development in the Local Plan recognises and reflects the different characteristics, functions and challenges of the different parts of the Borough and does not seek to over-concentrate growth or economic investment in one part of the Borough at the expense of meeting the needs in another.

Development in Settlements and in the Countryside

As set out elsewhere, the recognition in the Scoping Document that the Local Plan will need to consider development outside of the currently defined settlement boundaries is welcomed.

Castle Green Homes note that future development proposals will be considered under Policies S4 and S5 of the Revised NPPF (2026) depending on whether they are considered 'within' or 'outside' of settlements. To avoid establishing an overly restrictive long-term framework for what could otherwise be considered sustainable development over the plan period, Castle Green Homes suggest the Council takes a more flexible approach to defining settlements / development limits that allows for windfall developments that meet relevant criteria as to their suitability and sustainability to come forward.

Housing

Affordable Housing

It is essential that the affordable housing policy is underpinned by a robust plan-wide viability assessment, and that it is set at a level that does not undermine the deliverability of the Plan. The intention to prepare a viability assessment to inform the plan is supported, and Castle Green Homes welcome the opportunity to comment on this at an early stage in the plan-making process.

The policy should take a flexible approach to requirements for affordable housing tenure. This is to allow for site specific characteristics, viability considerations, but also crucially in recognition of the requirements of Registered Providers and the fact these factors and the evidence of need may change over the plan period.

Housing mix

Castle Green Homes would welcome an approach to housing mix policy in the emerging Local Plan which, rather than seeking to prescribe a housing mix at Plan level, maintains flexibility and recognises that precise mix should be agreed with the Local Planning Authority and determined on a site-by-site basis with regard to evidence, site location, density requirements, site and surrounding area characteristics and viability.

Housing standards

Castle Green Homes would support policy aspirations that new residential development must be high quality, inclusive, sustainable and contribute to the creation of successful and resilient communities.

The Consultation Document sets out how the Council is exploring the introduction of enhanced standards in relation to accessible and adaptable dwellings, increased water efficiency standards and Nationally Described Space Standards (NDSS). Whilst Castle Green Homes does not object to this in principle, it is essential that the requirements set in the policies are justified by robust evidence as to their need and deliverability. The decisions about appropriate thresholds and standards must have regard to the viability implications of imposing enhanced standards through the local plan viability assessment.

4 NPPF (2026) Policy HO6

5 Cheshire East – Determining the Settlement Hierarchy (November 2010)

Design

Castle Green Homes is supportive of the central objective of creating well-designed sustainable places. The Consultation Document considers options to implement design coding. Castle Green Homes would not support a highly prescriptive borough-wide design code or borough-wide policy setting out design parameters. Cheshire East is too diverse for a single code or set of design parameters to effectively guide strategic urban extensions, village growth, employment locations, transit-oriented development and rural communities.

It is essential that any policies relating to design incorporate sufficient flexibility to account for site-specific characteristics and context and the range of development required to meet diverse needs across the Borough. Any design policies should be tested through the viability assessment underpinning the Local Plan to ensure that their cumulative financial impacts do not undermine development viability or deliverability.

Local Plan Evidence Base

The proposed body of evidence due to be carried out to inform the new Local Plan is noted and welcomed. Castle Green Homes would welcome the opportunity to review the evidence base at an early stage in the process since this will be fundamental to informing the draft policies. In particular, the Land Availability/ Site Allocations Assessments, Housing Needs Assessment, Settlement Hierarchy and Spatial Distribution of Development Report and the Local Plan Viability Assessment. The evidence base documents should be made available either before or alongside the Local Plan consultation material at the relevant stages.

Castle Green Homes welcomes the opportunity to comment on the Local Plan Scoping Consultation and looks forward to continued engagement with the Council as the emerging Local Plan progresses.

Yours sincerely



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Annex 1: Land off Hassall Road, Alsager – Site Boundary and Illustrative Masterplan



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KEY

Site Boundary	2.57 Ha
Proposed Residential Development (c50-60 Dwellings at 35 DPH)	1.75 Ha
Potential Access Point	
Potential Pedestrian Access Points	
Existing Trees and Vegetation with RPA's	
Proposed Green Infrastructure of new structural woodland, habitat creation and accessible greenspace	
Public Footpath	
Potential new footway link	

rev	date	description	drwn / chkd
P02	27/03/26	Layout amended.	CTH / KMN
P01	25/03/26	First issue	CTH / KMN

client
Castle Green Homes Ltd

project
Land off Hassall Road, Alsager

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Illustrative Masterplan

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13920-FPCR-XX-XX-DR-A-0001

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P02

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