Marrons
Planning | Design | Architecture

This matter is being dealt with by [redacted]

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

28 August 2026

By email: localplan@cheshireeast.gov.uk

Dear Sir/Madam,

Local Plan Scoping Consultation: Submissions on behalf of Sandiway Investments Limited

Introduction

These representations have been prepared and submitted by Marrons on behalf of Sandiway Investments Limited. Sandiway Investments Limited control land south of Brereton on the A50 Newcastle Road. This site provides an opportunity to deliver a mixed-use scheme, including local housing and employment, plus local community services or an appropriate scale and has been promoted via the Council's call for sites.

Our client welcomes the preparation of a new Cheshire East Local Plan which provides an opportunity for the Council to create a fresh approach to growth. This will be achieved via a clear and deliverable vision for growth of all settlements across Cheshire East which supports a range of site types and sizes.

Our client also welcomes the Council's early engagement with stakeholders as part of its plan preparation, recognising the importance of collaborative working in developing a strategy capable of delivering the area's economic, social and environmental objectives. Within this regard, our client is keen to meet officers to discuss the potential of its land at Brereton for an SME / medium sized mixed-use development.

We set out below our client's response to the key planning issues that the new Local Plan will need to address, under the headings below. These comments correspond with the Council's online survey questionnaire and relevant sections.

It is noted that during the consultation period, the Government has issued the new National Planning Policy Framework 2026. We do not address the details of this latest NPPF here but note that the new strategic and local plan-making policies will need to be addressed by the

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RTPI Chartered Town Planner
RIBA Chartered Practice

Council in the formulation of its new Local Plan. This is particularly relevant in how the Council will deliver the standard methodology housing needs in full. We expand on this below.

Why prepare a new Local Plan?

Paragraphs 2.2-2.5 of the Local Plan Scoping helpfully set out the context of the current Local Plan, noting that the standard methodology for housing is one of the key reasons for change. Whilst our client agrees with this context, we wish to note other key issues that are relevant to spatial planning in Chester East. In the current Local Plan, the Council focused on larger, strategic sites and allocations over 150 dwellings only. This has led to a lack of opportunity for the forgotten SME sector, which needs to be addressed in the new Local Plan.

The new Local Plan must also allocate a broader range of site sizes and types to meet all housing needs. This should include land releases in smaller settlements where a lack of site opportunities and tightly drawn settlement boundaries have limited growth and impacted affordability ratios. In the case of Brereton, the settlement has a good range of local facilities including a primary school, and there is an opportunity for a SME sized project which can delivery local benefits.

The Local Plan should consider opportunities for growth where rural settlements would benefit from some development to support vitality. This is especially important with regard to lower birth rates affecting smaller schools and the need to maintain essential services in rural communities.

The context to the Local Plan has also changed in respect of constraints. One of the biggest constraints to growth in Cheshire East is the Jodrell Bank consultation zone. This policy has significantly constrained growth over the last 20 years but is now changed. It is publicised that the operational activity of Jodrell Bank is likely to change as the facility closes. As such the Council must revisit this policy constraint or build in flexibility should the position alter during the plan period.

Developing the new Local Plan

We acknowledge the Council's timetable regarding the new Local Plan preparation which aligns with the recently published plan making guidance. This represents a 'fast-tracked' process, and our client is keen to work with officers in the consideration of its land interests.

However, for reasons set out below under our comments on the plan period and meeting housing needs overall, the Council must ensure that the evidence base also addresses needs that arise in the current period now from 2024-2029, whilst the new plan is being prepared. Please refer to our comments under the next heading below.

Increase in housing requirements & plan period

Overall, we support the Council's acknowledgement in paragraphs 3.3-3.7 that there is a significant increase in the overall need for new homes in Cheshire East in line with the

Government's standard methodology, and that since December 2024, the Council has been unable to demonstrate a five-year housing land supply.

We note that the current Local Plan strategy is approaching 10 years old. It is based on a different context and strategy of 1,800 homes per year. The revised standard method is 2,530 dwellings a year, a 41% increase and difference of 730 dwellings per year. The Council recognises that this change in context occurred from December 2024. It is not something that is unforeseen.

This point raises questions around how *current needs* will be addressed in the intervening period since December 2024 until the new Local Plan is adopted in 2029. There is a strong argument that the plan period should have an earlier start date, from either December 2024 when the standard methodology was introduced, or, from 12 June 2026 when the Council issued its '**Notice to Commence'** the new local plan. Allowing for 15 years post adoption, this would mean that the Council needs to be planning for an 18- or 19-year plan period (from 2026), or, a 21-year plan period from December 2024.

The benefits of this are that the current needs would not be forgotten. It is our view that the plan period and housing requirement should be adjust accordingly, meaning that the Council needs to adjust the housing requirement to add in a further 3-5 years. This suggests that the Local Plan should plan for a total housing need of between **45,540-53,130** dwellings, representing either 18 or 21-year plan period. Actual delivery in the intervening period would be deducted to find the residual balance for delivery. Employment needs should also be adjusted to reflect the current period prior to adoption of the Local Plan.

Changes to Green Belt policy

As a general point, our client supports the Council's commentary that the new Local Plan will need to address the release of land from the Green Belt and consider grey belt opportunities, plus the consideration of Green Belt around well-connected railway stations. This aligns with the new NPPF.

The Council will need to undertake a new Green Belt Assessment. We would suggest that such assessment will need to look towards smaller, individual parcels as well as broad swathes of Green Belt land. This is important given the need to allocate land for all development needs including those of the SME sector.

Economic growth

The Scoping Consultation provides a single sentence regarding meeting economic needs at paragraph 3.16. This focuses on larger scale employment such as the industrial and logistics sector, data centres, gigafactories and freight.

Since the Covid pandemic, employment patterns have changed. This includes greater home-working and flexible space requirements which are not necessarily subject to Local Plan site allocations. Rural areas have increasing needs to support their local economies and the new Local Plan will need to include a flexible and enabling approach to such growth.

Small scale employment and rural diversification schemes can have a positive impact on communities, creating sustainable jobs and localised economic growth. The new Local Plan must seek to support such opportunities by both allocating land and creating a dynamic policy framework to support smaller scale economic development. As drafted, the Local Plan Scoping appears to be solely focused on larger site allocations.

Spatial Development Strategy

Paragraphs 3.13 and 3.18 helpfully set out the role of the Cheshire and Warrington Spatial Development Strategy, to be prepared by the Combined Authority. It is also helpful that the Council acknowledges that the SDS might not be prepared ahead of the new Local Plan, and that a proactive and collaborative approach will be required. We support the Council's pragmatic approach in this regard.

Spatial portrait

Section 4 of the Scoping Consultation includes several statements of fact about Cheshire East as a whole, including its size and population, geographical area, large employment locations and heritage and natural environment features.

Whilst our client has no specific comments on these statements *per se*, it is noted that paragraphs 4.17-4.19 include various facts around the rural-urban composition and demographic mix. This section states that some 18% of people live in the rural areas.

Our client notes that the current Local Plan does not make provision for any new homes in the rural area, with no allocations. This was because the Council did not previously consider allocations in Key Service Villages or below, favouring large site released. As part of the new Local Plan, the Council must include a more diverse assessment of local need in lower order settlements.

Plan Period

The Scoping Consultation document states at 5.1 that the new Local Plan will have a plan period of 2029 – 31st March 2045 which aligns with the NPPF requirement for *at least* 15 years post adopted, plus an allowance for any delays in plan preparation.

Our client supports the intention of the plan period of at least 15 years but notes that one of the main reasons for the new Local Plan is the changes to the standard methodology in December 2024, as cited by the Council. The Local Plan period must account for the intervening period from 2024 until 2029, when adoption is expected.

We address this in the housing section above and note that this could involve a plan period of 21 years from 2024-2045. The evidence based and housing and employment needs should be adjusted accordingly, including any completion since December 2024.

Creating a Vision and Objectives

The new Local Plan should include a positive approach to the delivery of housing and the growth being a key priority in the vision statement.

The Objectives should include delivery of local housing needs via the allocation of land in all settlement tiers.

Objectives should also be drafted to support the vitality of the rural community and SME sector.

Identifying and Assessing Sites

Paragraphs 5.10-5.12 of the Scoping Consultation refer to the process of site assessment for housing and employment sites, noting that the Council has completed call for sites exercises in 2024 and 2026.

We would encourage the Council to prepare and consult upon its methodology and criteria for the assessment and selection of sites, which is not currently available. To achieve 41% growth in housing delivery annually, the Council will need to ensure that it assesses sites of all sizes in all locations. Sufficient opportunity must be provided for SME developers in this regard. It is noted that this is something which is promoted in the NPPF, with government introducing a new category of 'medium' sized sites, comprising housing development where 10-49 homes would be provided, and a site area of up to 2.5 hectares.

Cheshire East has a wide distribution of settlements of all sizes. There is a good opportunity under the new Local Plan to identify and allocate land in some of the lower tier settlements which were left behind in the formulation of the currently adopted Local Plan and where local needs are currently unmet.

Green Belt

We refer to our comments above regarding Green Belt policy and assessment. The borough-wide assessment is welcomed, but this needs to consider smaller parcels across a range of settlements to be effective.

Settlement Hierarch

Our client supports the Council's statement that it will consider provision of services and facilities, population, jobs, sustainable transport, retail provision and settlement form. In particular, greater consideration must be given to the current '***Other Settlements and Rural Areas"*** tier which was largely forgotten in the current Local Plan, yet accounts for 18% of the population.

Many of these locations have a good range of local facilities such as primary schools, local shops and services which support local needs. However, to maintain vitality and viability, such locations would benefit from the additional of small to medium scale housing allocations. This would have a positive impact in meeting local affordable needs in rural areas where

affordability rations are problematic, as well as ensuring that services and facilities that are relied upon locally, are not lost.

The Council should also include assessment of any missing facilities in certain locations and consider how new housing might help deliver or sustain important local services.

Spatial distribution and development boundaries in smaller settlements

Our client welcomes the fresh approach to housing distribution. As we have set out above, distribution towards smaller settlements was overlooked in the current Local Plan. Other factors, such as the proposal to cease operation of Jodrell Bank, open wider approach to housing distribution this time around.

NPPF sets rules-based policy of 'within' or 'outside' of settlement boundaries, as part of policies S4 and S5. This means that the Council will have to carefully consider the drawing of new settlement boundaries, something which is very relevant for smaller tier settlements where larger allocations are not appropriate. Without some small and medium sized allocations, the rigidity of NPPF Policies S4 and S5 will remove any ability for rural communities to bring forward development.

We note that NPPF 2026 makes it clear that Neighbourhood Plans must not undermine housing delivery overall and should include allocation of land. The Council will need to set housing requirements for those organisations preparing new Neighbourhood Plans in line with national policy.

Housing Diversification and providing small and medium sized sites

Our client welcomes the inclusion of a policy approach to identify and allocate land for 10% of the housing requirement to be provided via sites of less than one hectare, and a further 10% to be provided on sites of between one and two and a half hectares in line with **NPPF Policy HO6**

We agree that such provision will support rural communities and help sustain the vitality of rural services as noted in paragraphs 5.47-5.49 of the Scoping Consultation.

This level of provision supports the SME sector and is a key part of the supply overall. However, it is noted that smaller sites can often struggle to deliver all on-site requirements such as the necessary land for SuDs, public open space (playing field requirements in particular), BNG and requirements of other planning policies. As such, flexibility will be required in the site sizes anticipated yield and policy criteria to ensure delivery.

Some of the appropriate locations for small and medium allocations will currently have tightly drawn boundaries, be constrained by Green Belt, and / or have Neighbourhood Plans in place. The Council will need to ensure a robust process to inform the allocation of smaller sites in these areas.

We understand that a land availability study is currently being prepared to inform this policy. The notion of smaller and medium sized sites for allocated is a marked change in Cheshire

East. In the preparation of the current Local Plan, there were no allocations in any settlements in Key Service Villages or lower tiers. The Council will need to carefully explain this change to those community leaders who have resisted development in their villages over the past decade.

In addition, the Council will need to brief those communities that are in the process of preparing a Neighbourhood Plan that they should taking steps to identify and allocate smaller and medium sites within their plans to ensure conformity with the Local Plan.

Jodrell Bank

We support the Council's intended review of the need for and effectiveness of the policy that relates to the Jodrell Bank Heritage Site. Recent announcements have suggested the withdrawal of funding for Jodrell Bank and the likely closure of its operation activities as an observatory. As such, it is an appropriate time for the Council to review the existing policy which has significantly constrained growth in parts of Cheshire East and sustainable locations such as Goostrey, Homes Chapel, Brereton and Chelford.

Evidence will need to be gathered regarding the effectiveness of the buffer zone policy and separate requirements for any policy to support the setting of the heritage asset.

The future of Jodrell Bank in its current form is highly uncertain, and the Council will need clear evidence as to the future use of this site. Even if the site does not immediately close, the new Local Plan will need a more flexible approach to enabling development that might fall within the current buffer designation.

Design

The Scoping Consultation refers to the suite of existing design guidance at national level including the National Design Guide, National Model Design Code, NPPF and emerging Design and Placemaking guidance. The latter is intended to form planning practice guidance.

The Council recognises that overlapping design guidance can create greater difficulties in interpretation, and it is right to reconsider how national guidance will inform its local decision taking. Reference is made at paragraph 5.137 to the greater use of design codes and the possibility of a borough-wide design code as a supplementary plan or establishing a strategic design framework within the Local Plan, supported by more detailed area-specific or site-specific codes prepared separately. The Council notes that the latter approach could provide a strategic borough-wide framework while allowing flexibility to respond to local circumstances.

Whilst we support the review of design guidance and Council's intention to align local and national guidance, there is a need to only use design codes where they are essential. Design Codes are time consuming, require expertise and can be rigid. They are not appropriate for every site and could stifle delivery, especially on smaller and medium sized sites. We would suggest that the Council considers use of a threshold of around 250 dwellings as the trigger point for when a design code is needed.

Summary

Our client welcomes the opportunity to be involved with the preparation of the new Local Plan for Cheshire East.

The Local Plan should be positively prepared and growth-led, with housing delivery at its heart. Significant housing growth will be essential to address affordability pressures, support economic growth, retain younger households and create more balanced and sustainable communities. The Council needs to carefully consider the plan period and ensure that the objectively assessed needs are delivered in full, including those need that arise during the intervening period until the Local Plan is adopted.

Our client also supports the Council's recognition that there is a need to support the SME sector. This is best achieved by the allocation of land in lower tier settlements as advised by the new NPPF

As part of this process, it is helpful that the Council recognises that Green Belt review is essential in meeting growth needs overall. The Council will also need to consider the relevance of other existing policy constraints including the Jodrell Bank consultation zone given the public statements regarding the likely cessation of that operational activity during the plan period.

We would be grateful if you would keep us informed as to the progress of the Cheshire East Local Plan.

Yours faithfully,

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