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Dear Local Plan Team

Cheshire East Local Plan Scoping Consultation

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

Thank you for consulting Historic England on the above. This response details the expectations of the Local Plan for the Cheshire East area and the historic environment.

Please note that as the new Local Planning Regulations and the NPPF is not yet finalised, this response represents an interim position. We reserve the right to suggest adjusted or alternative policies and evidence as approaches to planning reform are confirmed and/or if new issues emerge.

Historic England has produced a number of good practice advice notes on the historic environment, in particular the Good Practice Advice Note on the Historic Environment and Local Plans (<http://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/>), which provides supporting information on good practice in plan-making, and the Historic Environment and Site Allocations in Local Plans (<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>) may be useful in the production of your Plan. If necessary, please refer to other relevant Historic England [advice/guidance](#).

The scoping report mentions the need to cover the historic environment and heritage assets in the list of topics. This is an important issue for the Plan area and is integral to

meet the requirements of sustainable development, with other Local Plan objectives and ensuring that at examination, the Local Plan is considered 'sound'.

The Local Plan for Cheshire East will be expected to include a proper description, identification and assessment of the historic environment and the supporting evidence base is expected to include heritage information. The Plan will need to demonstrate how it conserves and enhances the historic environment of the area and guide how the presumption in favour of sustainable development should be applied locally. This includes ensuring that the sites, which it is proposing to put forward for development, will assist in delivering such a strategy. This should be included within the key considerations for the Cheshire East Local Plan.

Evidence base

A sound local plan should be based on an up-to-date evidence base which includes reference to the historic environment. Where the evidence base is weak, the Council will need to commission additional work to ensure that the historic environment is adequately dealt with and can be used to inform the Plan.

The evidence base needs to identify:

- What contribution the historic environment makes to the character of the area, to its economic well-being and to the quality of life of its communities;
- What issues and challenges it is facing and likely to be facing in the future;
- What opportunities the historic environment offers for helping to deliver the other objectives in the Plan area.

When undertaking this exercise, it is important to bear in mind that it is not simply an exercise in listing known sites but, rather understanding their value to society (i.e. their significance). There is a need to identify the subtle qualities of the place and its local distinctiveness and character which can easily be lost. There will need to be an assessment of the likelihood of currently unidentified heritage assets including sites of historic and archaeological interest being discovered in the future. Evidence gathering can also help to identify parts of a locality that may be worthy of designation as a conservation area and identify assets that are worthy of inclusion in a local list.

Vision and strategic objectives

Within the NPPF, the historic environment is treated equally with all other matters in terms of their importance and their contribution. The historic environment should be recognised

in the vision (and the strategic objectives) in the Local Plan for its contribution to identity, place making, the economy and culture (for example). This then establishes a firm base for the rest of the Plan and its policies.

Spatial portraits and identity of place

The Local Plan should include a proper description and assessment of the historic environment in Cheshire East and the contribution it makes to the area as required in the NPPF. The Plan needs to describe the historical growth of the area and identify its historic environment. It should also clearly identify the different places and their character and identity and the contribution it makes to all aspects of life in Borough.

Local Plan Policies

One of the principal objectives of planning and achieving sustainable development, under the NPPF is the conservation of heritage assets, for the quality of life they bring to this and future generations. Conservation means maintaining what is important about a place and improving this where it is desirable. It is not a passive exercise. It requires a Plan for the maintenance and use of heritage assets and for the delivery of development within their setting that will make a positive contribution to local character and distinctiveness.

Local Plans should include policies to conserve and enhance the historic environment of the area and to guide how the presumption in favour of sustainable development should be applied locally. It is vital to include policies for the historic environment in the local plan as the plan will be the starting point for decisions on planning applications and any plans that come forward are required to be in general conformity with the policies of the Local Plan.

Policies for the historic environment will derive from the overall strategy to deliver conservation and enjoyment of the area's heritage assets for generations to come. These may be policies that concern themselves specifically with the development of types of heritage asset that is unique to Cheshire East. But delivery of the NPPF objective may also require policies on use, design of new development, transport layout and so on. Indeed, every aspect of planning, conceivably can make a contribution to conservation. Plan policies in all topics should be assessed for their impact on the strategic conservation objective.

Conservation is not a standalone exercise satisfied by standalone policies that repeat the NPPF. The Local Plan should also consider the role which the historic environment can play in delivering other planning objectives:

- Building a strong, competitive economy
- Ensuring the vitality of town centres
- Supporting a prosperous rural economy
- Promoting sustainable transport
- Supporting high quality communication infrastructure
- Delivering a wide choice of high-quality homes
- Requiring good design
- Protecting green belt land
- Meeting the challenge of climate change, flooding and coastal change
- Conserving and enhancing the natural environment
- Facilitating the sustainable use of minerals

In formulating the strategy, it is advisable and often necessary to consider the following factors:

- How the historic environment can assist in the delivery of the vision and the economic, social and environmental objectives for the plan area;
- How the Plan will address particular issues identified during the development of the evidence base including heritage at risk;
- The interrelationship between the conservation and enhancement of the historic environment and the other Plans policies and objectives;
- The means by which new development in conservation areas and within the setting of heritage assets might enhance or better reveal their significance;
- How local lists might assist in identifying and managing the conservation on non-designated heritage assets;
- How the archaeology of the Plan area might be managed;
- How CIL funding might contribute towards ensuring a sustainable future for individual assets or specific historic places and whether or not certain heritage assets might need to be identified;
- Whether masterplans or design briefs need to be prepared for significant sites where major change is proposed;
- What implementation partners need to be identified in order to deliver the positive strategy;
- What indicators should be used to monitor the effectiveness of the strategy.

The draft revised NPPF (December 2025) proposes national decision-making policies. The intention being that local plans should not replicate, substantively restate or modify national decision-making policies unless directed by other policies in the draft NPPF. It also requires these development management policies to set out a positive strategy for the historic environment, as is the case in the adopted NPPF. We would still expect the Council to consider the necessity for local specific historic environment policy (like above) or policies to identify:

- those elements of the historic environment that are especially important to the identity of the district;
- any issues facing heritage assets in the district, including those that are 'At Risk', and how the authority can proactively address this and identify opportunities to conserve and enhance heritage;
- any relevant heritage initiatives or projects for heritage led regeneration;
- whether it is necessary to protect views to/from prominent landmarks.
- whether it is necessary to include a bespoke policy relating to a specific heritage asset.

Strategic Cross Boundary Issues

Strategic cross boundary issues that affect the historic environment are issues that can only be effectively addressed at a larger than local scale and may cover the issues listed below, this is not an exclusive list and strategic issues will have to be considered on an area-by-area basis.

- extensive designated and non-designated heritage assets, e.g. World Heritage Sites, historic landscapes
- major heritage-based tourism attractions, the management of which may impact upon more than one authority
- major quarries for building and roofing stone, e.g. Portland stone
- major changes to green belt which affect the preservation of the setting and character of historic towns
- major development proposals likely to affect important heritage assets in a neighbouring authority, e.g. major urban extensions, infrastructure proposals

These strategic issues will not necessarily and always be the same as the policies for the protection and enhancement of the historic environment included in a Local Plan but are likely to be a sub-set of them. Indeed, local circumstances may indicate that strategic approaches may not always be needed. The sustainability appraisal scoping report should help to identify what is important for a particular plan area.

Site Allocations

The allocation of sites in a Local Plan, should provide a clear and positive basis for development by providing certainty. This is about consideration of the impacts on the historic environment at the earliest Local Plan stage. It should provide an approach that has design and mitigation measures incorporated into the Plan, which not only deal with the impact but provide guidance for developers.

The NPPF makes it clear that the significance of heritage assets can be harmed through development within their setting. There is a requirement in the Town and Country Planning Act 1990 that 'special regard' should be had to the desirability of preserving listed buildings, their setting or any features of special architectural or historic interest which they possess. It is also the duty of the Council to preserve or enhance the character or appearance of its conservation areas and their setting. Where potential development sites appear to include non-designated assets including the possibility for archaeology, their potential should be investigated, and retention/exploration should be promoted.

Consequently, before allocating any site there would need to be some evaluation of the impact, which the development might have upon those elements that contribute to the significance of a heritage asset including their setting, through undertaking a heritage impact assessment. The assessment of the sites needs to address the central issue of whether or not the principle of development and loss of any open space is acceptable. It needs to evaluate:

1. What contribution the site in its current form makes to those elements which contribute to the significance of the heritage assets. For a number of these heritage assets, it might be the case that the site makes very little or no contribution.
2. What impact the loss of the area and its subsequent development might have upon those elements which contribute to the significance of those heritage assets.
3. If it is likely to result in harm, how might that harm be removed or reduced to an acceptable level.

4. If the harm cannot be reduced or removed, what are the public benefits that outweigh the presumption in favour of the conservation of the heritage asset?

The selection of sites for development needs to be informed by an up-to-date evidence base and the Plan should avoid allocating those sites which are likely to result in harm to the significance of the heritage assets of the Plan area. Where negative impacts are unavoidable, the Plan should consider how any harm might be mitigated. This could include measures such as a reduction of the quantum of development at a site, amending the types of development proposed or locating the development within another part of the site allocation. Such initiatives need to be fully justified and evidenced to ensure that such measures are successful in reducing identified harm.

The allocation of sites for development may also present better opportunities for the historic environment. For example, new development may better reveal the significance of heritage assets or may provide an opportunity to tackle heritage at risk.

Where relevant, policies for allocated sites may need to make reference to identified historic environment attributes in order to guide how development should be delivered. For example, this might require the policy to include detailed criteria or providing supplementary information with the supporting text.

Monitoring and Review

The effectiveness of a Local Plan, the delivery of its proposals and in informing future reviews is done through appropriate indicators. It is important that there are key indicators of each Local Plan topic area, which includes covering the historic environment. This will contribute to the monitoring and review of the plan's policies and whether they are effective in their role in delivering the content of the Plan.

Historic England strongly advises that you engage conservation, archaeology and urban design colleagues at the Council to ensure that you are aware of all the relevant features of the historic environment and that the historic environment is effectively and efficiently considered in the Local Plan policies, in the allocation of any site and in the preparation of the IA/SEA. They are also best placed to advise on local historic environment issues and priorities, including access to data held in the HER. This will ensure that there is joined up and robust approach is undertaken to historic environment issues.

For the most part our advice remains valid. We note the draft revisions to the National

Planning Policy Framework (NPPF) and will amend our advice where necessary once the new version of the NPPF is adopted.

If you have any queries about this or would like to discuss anything further, please do not hesitate to contact me. We would welcome the opportunity to work with you in the production of the Local Plan document.

Yours sincerely,

Emily Hrycan

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Historic England**