1 September 2026

Cheshire East Council

Via email to localplan@cheshireeast.gov.uk

Dear Sir/Madam,

Local Plan Scoping Consultation on behalf of Highgrove Strategic Land Ltd
Land at Manor Lane, Holmes Chapel

Introduction

These representations are made on behalf of Highgrove Strategic Land Ltd (Highgrove) who welcome the opportunity to provide their views on the new Local Plan. They are very keen to work with Cheshire East Council (the Council) to help shape the Local Plan and ensure that it addresses the needs of the borough.

We have sought to broadly follow the order of the Sections, and sub-titles set out on the Council's online consultation document and also add online comments where possible. In this regard, we outlined with underscore the relevant paragraph numbers cited within the Council's online consultation text as a way of cross referencing where online comments have been made (e.g. #1.1). Relevant comments set out in this letter includes:

- **Context of the new local plan:**
  - #3.3-3.7 Increase in housing requirement
- **Baseline information and spatial portrait:**
  - #4.5 Connectivity
  - #4.6-4.10 Economic contribution
  - #4.11-4.16 Heritage, culture and natural environment
  - #4.20 Demographic mix
- **Scope of the new local plan:**
  - #5.1 Local plan period
  - #5.5-5.7 Planning for growth
  - #5.20-5.23 Settlement hierarchy
  - #5.24-5.26 Spatial distribution
  - #5.33-5.35 Affordable housing
  - #5.39-5.41 Housing for older people and specialist accommodation
  - #5.129-5.130 Jodrell Bank Observatory
  - #5.145 New evidence
- **Proposed local plan engagement strategy:**
  - #6.51-6.56 Engaging with site promoters

We note that the Council are not inviting the submission of sites (which has been undertaken through a separate call for sites process). We respect this position and can confirm that Highgrove have submitted current land interests to the Council as part of that process. For ease of reference the call for sites submission for **Land at Manor Lane, Holmes Chapel** (Site) is enclosed with this letter given that the representations are relevant to that Site in particular.

The Site is being promoted by Highgrove as a suitable site for residential-led allocation in the new Local Plan to accommodate circa 60 dwellings and a residential care home/elderly accommodation.

These representations are set within the context of the National Planning Policy Framework (NPPF) published in August 2026 and the collection of draft Government guidance for local planning authorities titled 'Create or update a local plan using the new system'.

Ultimately, the new Local Plan will be examined to assess whether it is positive, effective, consistent with national policy, and conforms with any adopted spatial development strategy (SDS) for the area, or emerging SDS depending on its stage of preparation.

Context of the New Local Plan

#3.3–3.7 Increase in housing requirements

The new Local Plan should be based on a housing need assessment that establishes the overall number of homes needed in the area as a minimum over the plan period, using the standard method. This is currently 2,530 dwellings per annum (dpa) but will need to be kept under review as the new Local Plan progresses to consider changes in housing stock and affordability data.

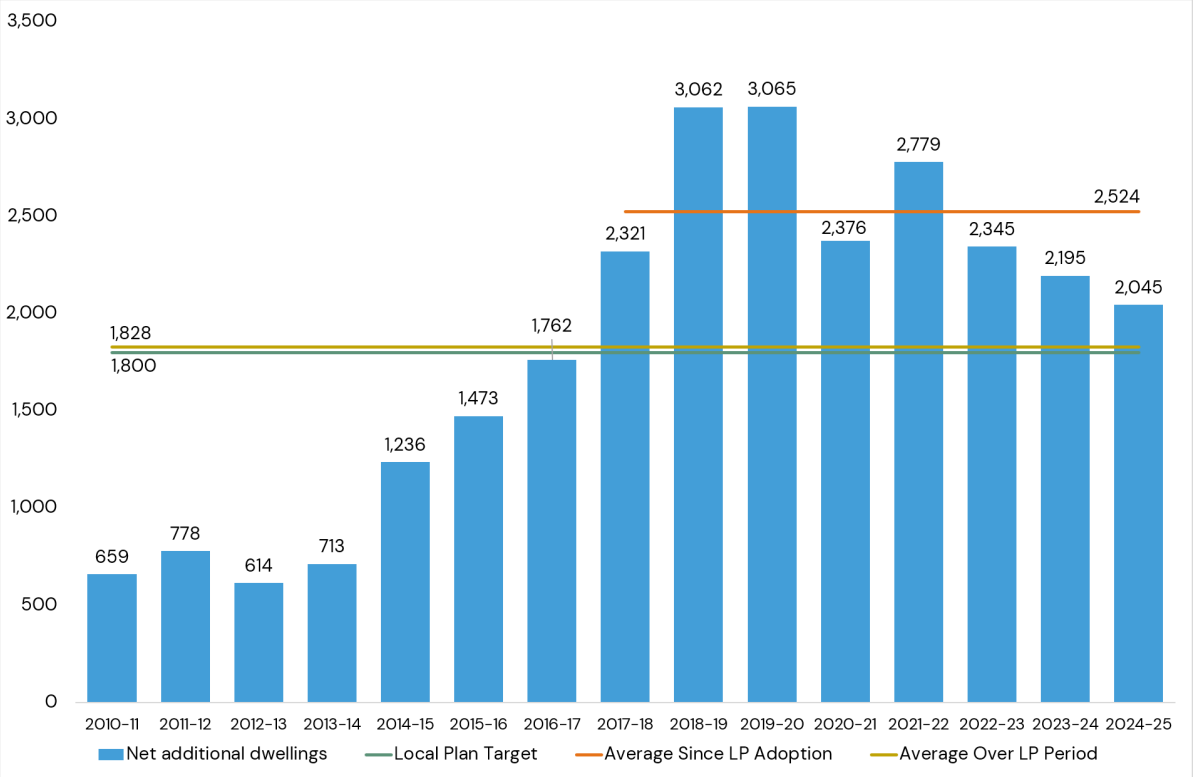
Whilst 2,530 dpa is a step-up on the adopted housing requirement of 1,800 dpa in the Local Plan Strategy (LPS), it is wholly achievable with due consideration being given to the land available within Cheshire East which is not restricted.

The adopted Local Plan figure of 1,800 dpa was based on an Objectively Assessed Housing Need Assessment that dates back to 2015; was influenced by very low/poor delivery rates incurred over the course of the early years of the plan period, and predicated on an average 0.7% jobs growth rate, which has been significantly surpassed since the start of the adopted plan period.

The former Standard Methodology was based on the 2014 Household Projections, which are now 12 years out of date, and again, was a projection of past low delivery rates within the Borough.

Cheshire East's actual net delivery of homes since the Local Plan was formally adopted in 2017, actually averages at 2,524 dwellings per annum (see Figure 1 below), which demonstrates the Borough contains a very strong housing market area, that can positively contribute to the Government's overall objectives to significantly boosting supply at a level that is consistent with the new Standard Methodology requirement.

Figure 1: Net Housing Delivery in Cheshire East



We are of the strong view that the above points should set out in any updates to the Council's Housing Evidence base to clearly demonstrate why the new Standard Method requirement is fully justified and should be treated as the minimum housing requirement for the Borough.

Baseline information and spatial portrait

#4.5 Connectivity

In light of the 2026 NPPF and its reliance on the national Connectivity Tool, it would also be prudent to include some initial information in terms of how Holmes Chapel score in this regard when considering the national and local picture.

Holmes Chapel is well-placed to support growth given its railway connectivity. Holmes Chapel fall within the Crewe Travel to Work Area (TTWA), which is a top 60 TTWA, noting this is a key policy measure within the 2026 NPPF when considering locations next to 'well connected stations' as defined by the NPPF and the policy implications towards land that are within a reasonable walking distance to such locations. Two trains per hour operate from Holmes Chapel in each direction. The station falls on the Crewe-Manchester line – with two trains per hour to Manchester and two trains per hour to Crewe.

The site benefits from being within a reasonable walking distance (as defined in Annex B of the NPPF) of Holmes Chapel train station, located approximately 300 metres away based on a real walking route. Residential development in such a location is supported by the NPPF, subject to meeting the wider policy criteria. The NPPF places strong emphasis on housing delivery and densification to increase supply, including the "default yes" approach to development around well-connected stations and the expectation for minimum densities in these areas. Development at this location should therefore be supported.

#4.6-4.10 Economic contribution

The Local Plan should make it clear that Cheshire East is strongly aligned with the wider ambitions of the UK Industrial Strategy on the basis of:

- its close geographical links and connectivity to Greater Manchester and
- it containing clusters associated with advanced manufacturing and life sciences which are both identified within the selective 8 growth sectors within the UK Industrial Strategy.

Bespak is a longstanding employer in Holmes Chapel, a point that was recognised by Members at the August Southern Planning Committee. This local employment role reinforces the need for the Local Plan to ensure that sufficient housing is provided in sustainable locations such as Holmes Chapel, where new homes can directly support the existing workforce and future recruitment needs of major employers like Bespak.

#4.11-4.16 Heritage, culture and natural environment

The Council recognises Jodrell Bank Observatory (JBO)'s status as a UNESCO World Heritage Site. We consider it important that the Council clearly distinguishes between:

- the heritage significance of Jodrell Bank as a designated heritage asset, including the Grade I listed Lovell Telescope; and
- the technical and operational significance of the wider astrophysical observatory and the extensive safeguarded area surrounding the site.

The two concepts are separate and should not be married together, particularly in light of recent Government announcements that Jodrell Bank will no longer be receiving further Government grants and funding, which we make further representations at #5.129-5.130.

#4.20 Demographic mix

Whilst we note that this section provides only high-level demographic information for the Borough, we consider it essential that the Local Plan also identifies the proportion of households with occupants in need of care and elderly residents. This is a key demographic indicator that will

directly influence where the Council may need to deliver, support, and prioritise specialist accommodation for older people over the plan period.

Highgrove's site in Holmes Chapel is able to contribute positively to this need. The site has the potential to deliver care home provision or specialist accommodation for older residents, aligning with both demographic trends and the Council's wider objectives to plan for an ageing population.

Scope of the new local plan:

#5.1 Local plan period

The Local Plan period should extend beyond the proposed 15 years, taking account of several key strategic considerations that will shape growth across Cheshire East over the coming decades. We note that the 2026 NPPF has reduced the recommended minimum requirement to 10 years under Policy PM2: Local Plan.

Notwithstanding this, we would welcome a scenario where the CEC Local Plan (alongside the CWAC Local Plan and Warrington LP) cover at least a 25 year plan period and are prepared on an evidence base that takes account of the 30 year investment programme for the Combined Authority.

A Local Plan that is prepared with at least a 25 year horizon and plan period could clearly direct the production of an SDS that could either be adopted at the same time as the Local Plan, or failing that be in a position where it could be progressed and adopted quickly in light of the fact that the Local Plans will have done a lot of the heavy lifting already. Indeed, this would be consistent with Part 1b of Policy PM2: Local Plans, 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'***

Importantly, the 10-year period is a minimum requirement. Where strategic development forms part of the spatial strategy (such as new settlements or significant extensions to existing towns and villages), national policy expects a vision that looks much further ahead, typically at least 30 years, to reflect the realistic timescales for delivery.

Further to the Council's devolution agreement and the formation of the Cheshire and Warrington Combined Authority, we note that a devolution agreement has been set that seeks to focus £650 million worth of investment fund over 30 years. We also note that the region's first mayoral election is scheduled for May 2027.

The emerging Cheshire and Warrington devolution deal is expected to significantly increase economic activity across the combined authority area. The devolution process is advancing in parallel with the preparation of the new Local Plan and will bring enhanced transport connectivity, new investment, and improved employment opportunities across the boroughs.

The new Local Plan must identify broad locations for long term housing growth that can support and align with the combined authority's economic ambitions. Settlements with strong employment bases and excellent transport connectivity, such as Holmes Chapel, is a logical and sustainable location for accommodating this future growth.

The 2026 NPPF also introduces Policy PM1, which sets out expectations for Spatial Development Strategies at a sub-regional scale. This is particularly relevant in the context of the combined authority. Policy PM1 requires a strategy for a sustainable pattern of growth over at least 25 years, recognising that a proportion of this growth will need to be accommodated within Cheshire East. The Local Plan must plan positively for this requirement by identifying broad locations for growth.

#5.5-5.7 Planning for growth

We note that the scale of development to be planned for is not fixed and will be informed by the emerging evidence base. We will comment further once the Council publishes evidence on housing demand. However, we note that paragraphs 5.5 to 5.7 appear to focus on the production of need assessments for housing and employment and exploring 'opportunities for regeneration'.

The 2026 NPPF makes it clear that the objectives of the policies contained within:

- Chapter 6: Delivering a sufficient supply of homes is to 'support the delivery of a substantial increase in the supply of homes…'; and
- Chapter 7: Building a strong, effective economy is to 'enable businesses to invest, expand and adapt in a way that reflects the opportunities, challenges and characteristics of different areas and supports long-term economic growth both locally and nationally'.

In the context of housing, we emphasise that the Standard Method figure represents a **minimum** requirement at 2,530 dwelling per annum. However, the PPG highlights that housing requirement may be higher than the identified housing need, and authorities should consider the merits of planning for higher growth if, for example, this would seek to reflect economic growth aspirations. This is reaffirmed under **Policy HOU2: Setting requirement figures for homes** within the 2026 NPPF, where part 3b states the housing requirement figure should:

> *'Be higher than the overall figure identified in the local housing need assessment where appropriate and that this will include situations where a housing requirement is necessary to meet the needs of neighbouring areas or to reflect growth ambitions linked to economic development or infrastructure investment.'*

In short, if the minimum housing requirement as set by the SDS or the Standard Methodology is not sufficient to meet the growth or infrastructure investment ambitions of the Council and the economic vision for the area, the housing requirement should be increased.

In the context employment and economic needs, NPPF **Policy E1: Providing the conditions for long-term economic growth** makes it clear that this should start with a clear economic vision

and strategy, which takes a positive, proactive and realistic approach to encouraging sustainable economic growth in urban and rural areas, having regard to the UK Industrial Strategy and relevant strategic and local strategies for economic development and regeneration. It goes onto confirm that it is not just existing business needs that should be considered but also wider needs and opportunities for economic growth and investment including relevant market signals and propriety places for investment in key sectors as set out in the UK Industrial Strategy and other programmes such as Industrial Strategy Zones and AI Growth Zones.

In short, whilst it will be necessary for the Local Plan evidence base to assess past growth and land take up to explore the potential need for employment land, NPPF Policy E1 requires a more proactive and visionary approach to be adopted and clearly points to the need to positively identify opportunities for growth.

Based on the Council's latest Annual Monitoring Report (2024/25) as set out in Table 1 below, Cheshire East's jobs growth has fluctuated year on year (seemingly due to more recent changes influenced by Brexit, the pandemic and possibly the Ukraine War). Prior to this, however, jobs growth was very strong. Data shows that prior to Brexit and the pandemic, Cheshire East was successful in generating new employment, with an average of over 3,500 new jobs created year on year between 2010 to 2019 (equating to an average annual jobs growth of +1.9%).

However, the years following the pandemic have shown the local authority to be struggling to maintain employment increases, with job numbers falling from a high of 206,000 in 2019 to 201,000 in 2020. This equates to an annual average loss of jobs at -2.4%.

Over the course of the plan period, however, jobs growth has still average 1.3% per annum and this is still significantly higher than the 0.7% jobs growth the adopted plan was predicated on which led to the adopted Local Plan (and LPS inspector) concluding that an average annual housing target of 1,800 per annum. Based on this alone, this would suggest that the new Local Plan should be targeting an employment growth and investment strategy that looks to achieve at least 1.3% jobs growth per annum and in our view, it should be higher to capitalise on the locational advantages of the Borough and key sectors that align with the UK Industrial Strategy.

Table 1 - Employment / Jobs Growth 2010-2024

Year	Cheshire East Jobs	Annual Change	Annual Jobs Growth Change (%)
2010	174,000	/	/
2011	176,000	2,000	+1.1%
2012	178,000	2,000	+1.1%
2013	181,000	3,000	+1.7%
2014	189,000	8,000	+4.4%
2015	195,000	4,000	+2.1%
2016	199,000	4,000	+2.1%
2017	203,000	4,000	+2.0%
2018	197,000	-6,000	-3.0%

2019	206,000	9,000	+4.6%
2020	201,000	-5,000	-2.4%
2021	204,000	3,000	+1.5%
2022	204,000	0	0.0%
2023	208,000	4,000	+2.0%
2024	210,000	2,000	+1.0%

Indeed, in terms of generating additional jobs growth going forward, Cheshire East still has an excellent foundation to build upon. Holmes Chapel is a clear example of this strength. It accommodates Bespak, a major employer in the advanced manufacturing and life sciences sector, specialising the production of inhaled and nasal drug-delivery.

This fit neatly within the Government's Modern Industrial Strategy for the UK, issued in November 2025 and noted under the 2026 NPPF Policy PM1. The Strategy targets eight sectors with the highest potential for productivity, exports, and job creation:

- Advanced Manufacturing
- Clean Energy Industries
- Creative Industries
- Defence
- Digital and Technologies
- Financial Services
- Life Sciences; and
- Professional and Business Services.

These sectors are expected to drive national productivity, support the net zero transition, and create 1.1 million new jobs by 2035. Cheshire is referred to within the document in relation to Life Sciences and Chemical production in the context of boosting growth in Northern City regions and clusters. The Industrial Strategy also makes reference to improving the connectivity across the North of England, which is now being picked up through the Northern Powerhouse Rail project. It also highlights how the Government will remove blockers in the planning system to drive the economy forward and encourage growth.

The 2026 NPPF embodies the Government's latest planning reforms but there are also wider initiatives planned by the Government in terms of tax reform and other interventions that purposefully seek to put the UK back onto a high growth agenda, as highlighted in the Industrial Strategy. In short, such reforms are targeting greater levels of jobs growth and productivity.

The Local Plan and its evidence base must clearly recognise that Holmes Chapel's economic contribution is nationally relevant, and that its ability to support advanced manufacturing and life sciences growth is coupled with providing more housing in a sustainable, well-connected location. For these reasons, we consider that Holmes Chapel should be identified as a key location for future residential growth to ensure that its economic potential can be fully realised.

#5.20-5.23 Settlement hierarchy

Whilst there is no specific requirement in national policy to set a hierarchy of settlements through the Local Plan it is noted that the Council will establish a settlement hierarchy as part of the future planning strategy with the intention of informing the spatial distribution of development, the approach to site allocations and the definition of settlement boundaries.

It is noted and welcomed that the Council are currently collating evidence to inform a review of the settlement hierarchy, considering provision of services and facilities, population, jobs, sustainable transport, retail provision and settlement form. Comments may be made on that evidence in due course as it is expected to be published as part of the subsequent 'plan content and evidence' consultation next year.

Alongside the review of the settlement hierarchy, it is expected that the infrastructure required to support growth in settlements will be explored though the Infrastructure Delivery Plan (IDP). It will be necessary to get a handle on how future development may be able to enhance the role, function and sustainability of settlements through improved infrastructure provision and helping to underpin and attract new services and facilities in specific settlements.

Highgrove welcome discussions with the Council as this Site is of such a scale that it can provide supporting infrastructure to assist in accommodating growth in Holmes Chapel.

At present, Holmes Chapel is identified as a Local Service Centre; however, given its existing range of services, strong connectivity and employment role, we consider that it is capable of functioning as a Key Service Centre. We set out detailed representations on this point in the following sections.

#5.24-5.26 Spatial distribution

Highgrove support the preparation of new evidence to underpin the new Local Plan, including a report on the spatial distribution of development. We agree that the Local Plan will need to set out a clear spatial strategy and distribution of development once the extent of need is identified. However, the evidence base and draft Local Plan should also take account of clear opportunities for development particularly where it is evident that the environmental impacts would be limited, yet the development of land would still positively contribute to economic and social objectives of the NPPF and Local Plan more widely.

Such an approach would tie in with the fact that the housing requirement set by the Standard Method is a minimum requirement and the Government are seeking to significantly boost the supply of land for housing and identified opportunities to grow the wider economy. In short, the allocation of sites does not strictly need to be tied to need but can also be geared towards unlocking and positively planning for suitable development opportunities where they exist, are available, deliverable and suitable and would positively contribute to the Government's wider growth agenda.

Holmes Chapel has excellent connection to the M6 via Junction 18 and benefits from a train station and a range of other services, which we consider tip Holmes Chapel into a Key Service

Centre category. It would be found to be well placed to address a substantial proportion of the housing requirement since:

- Holmes Chapel is not constrained by Green Belt or Strategic Green Gap designation.
- Holmes Chapel is not constrained by the Peak District National Park Fringe which includes land to the east of Macclesfield, north, east and south of Bollington, and south east of Congleton.
- Holmes Chapel is not constrained by Local Landscape Designations which include land to the north of Knutsford, north of Wilmslow, west of Handforth, east of Alderley Edge, north and west of Macclesfield.
- Holmes Chapel provides ready access to shops, services, amenities, major employment opportunities, and railway infrastructure.

Despite not being surrounded by Green Belt, the sustainable growth of this settlement has been severely hampered by the Jodrell Bank Consultation Zone with ongoing objections from the University of Manchester with (in our view) limited credible evidence relating to the true/tangible impacts of development on the success of its continued role and operation.

It will be important for the Local Plan to provide a credible and sustainable growth strategy for Holmes Chapel particularly noting that the Council abandon the Jodrell Bank SPD. Significantly less weight should be afforded to the current consultation zone because superior technology elsewhere and far removed from Jodrell Bank now provides the most effective and efficient data. Whilst Jodrell Bank's heritage significance should be recognised, development in Holmes Chapel should not be constrained by the consultation zone where no heritage harm can be evidenced. (see further comments on this in #5.129-5.130).

#5.33-5.35 Affordable housing

It is noted and welcomed that the Council are to prepare a housing needs assessment to identify the key housing issues that the Local Plan will need to address, including the need for affordable housing, housing for older people, specialist accommodation, self-build and custom housebuilding, and the mix of dwelling sizes and tenures across the borough.

The Council already note that there are geographical variations in affordability across the borough, and that more evidence will be needed to understand these differences and how they could be addressed. This evidence is welcomed, as is the Council's commitment to consider evidence on development viability. Comments may be made on that evidence in due course as it is expected to be published as part of the subsequent 'plan content and evidence' consultation next year.

In terms of affordability, the affordability ratio of the borough on adoption of the current LPS in 2017 was 7.65. Since adoption the affordable ratio has risen to an average of 8.25, only dropping

below 7.65 most recently in 2025. This would suggest that the LPS was ineffective in lowering affordability ratios or has taken some time to take effect in lowering the ratios.

Moving forwards, there will need to be clear evidence on the extent of the affordable housing needs within the borough, to what extent those needs should be addressed, and how this informs the ultimate housing requirement in the new Local Plan. An increase in the total housing figures included in the Local Plan should also be considered where it could help deliver the required number of affordable homes[1].

#5.39-5.41 Housing for older people and specialist accommodation

We agree with the Council that demand for specialist accommodation will likely to continue to increase, and we note our site's potential to help meet this need. Our view is that localised needs should be clearly identified by the Council at plan making stage to ensure that appropriate forms of specialist housing can be planned for in the right locations.

#5.129-5.130 Jodrell Bank Observatory

We have enclosed previous representations made to the Council in February 2022 which were issued to the Council's Draft Jodrell Bank SPD, which has since been abandoned. We consider much of the objections content is still highly relevant, particularly in light of recent Government announcements that Jodrell Bank will no longer be receiving further Government grants and funding.

First of all, it is important that the background context of the UNESCO status is duly considered and interpreted. We feel the Criterion cited within the World Heritage Committee (WHC) papers would be best quoted in full in the new Local Plan as these will be important considerations for any decision maker going forward. We have included the full text of the four criteria below:

- ***Criterion (i):*** *Jodrell Bank Observatory is a masterpiece of human creative genius related to its scientific and technical achievements. The adaptation and development of radar and radio frequency reflectivity to develop radically new equipment, such as the Transit Telescope and Lovell Telescope, were a key part in the development of entirely new fields of scientific research and led to a dramatic change in the understanding of the Universe. The Observatory was important in the pioneering phase and later evolution of radio astronomy.*

- ***Criterion (ii):*** *Jodrell Bank Observatory represents an important interchange of human values over a span of time and on a global scale on developments in technology related to radio astronomy. The scientific work at Jodrell Bank was at the heart of a global collaborative network. In particular, several important technological developments such as very large paraboloidal dish telescopes and interferometer were developed at the*

[1] Paragraph: 024 Reference ID: 2a-024-20190220, Planning Practice Guidance

Observatory, and were later influential in scientific endeavours in many parts of the world.

- ***Criterion (iv):*** *Jodrell Bank Observatory represents an outstanding example of a technological ensemble which illustrates a significant stage in human history (1940s-1960s) – the transition from optical astronomy to radio astronomy and the associated consequence for the understanding of the Universe through multi-wavelength astrophysics. The property is also associated with the peacetime development of 'Big Science' as a major change in the way in which scientific research was supported and undertaken. The surviving evidence at the property related to the evolutionary development of radio astronomy from the post-war pioneering phase through to sophisticated, large scale research activity in the field makes Jodrell Bank an outstanding example of such a technological ensemble.*

- ***Criterion (vi):*** *Jodrell Bank Observatory is directly and tangibly associated with events and ideas of outstanding universal significance. The development of the new field of radio astronomy at the property lead to a revolutionary understanding of the Universe which was only possible through research beyond the possibilities of optical astronomy to explore the electromagnetic spectrum beyond visible light. Understanding of the nature and scale of the Universe has been dramatically changed by research in radio astronomy at the Observatory.*

What is clear from the above Criterion is that much of the Outstanding Universal Value (OUV) status is derived from the relatively complete nature of JBO and the relevance of past findings and observations and how they have furthered human understanding of the universe. No reference of the Consultation Zone or the future role of JBO is highlighted within the Criterion above.

Within the background WHC paper there is also reference to the site's isolated rural location, '**which required an absence of radio interference**' (note past tense). It is also noted that '**The ongoing scientific use of the Observatory is an important attribute reflecting the continuity of research**'. However, it is important to highlight that the WHC reports do not specifically refer to the ongoing efficiency of the telescopes themselves, nor does it rule out other forms of research being the mainstay function of JBO going forward. Indeed, the recommendations to the State Party offered as part of the OUV status states the following:

> *'Recommends that the State Party give consideration to the following:*
>
> *a) Providing a summary end of project report following completion of the current major conservation project,*
>
> *b) Confirming the timeframe for the conservation of the two Botany Huts,*
>
> *c) Continuing to respect and portray the historical character of the buildings and site development. This character often includes relatively primitive buildings, often with additions undertaken with little regard to aesthetics or quality construction,*

d) Providing the revised Conservation Management Plan and associated Site Gazetteer when completed, to the World Heritage Centre,
e) Considering master planning for the property and buffer zone to anticipate possible future development needs.'

It is not strictly true to suggest that the preserving the current efficiency/status quo of the radio telescope is absolutely paramount to the heritage status of the site. Indeed, the above recommendation suggests that the WHC were open to some change being necessary within the Consultation Zone / Buffer Zone to meet anticipated possible future development needs but this should be master planned appropriately.

There is no evidence within the WHC reports in relation to the extent to which the buffer zone has protected the observatory's functionality/efficiency or what the baseline position is in relation to interference. There is also no reference to the existing communities located within the buffer zone within the WHC reports. Instead, the vast majority of the WHC reports and findings relate to the JBO site itself, the physical structures within it and past observations. Overall, the WHC reports highlight how JBO was at the very forefront of events and ideas of outstanding universal significance and continues to play an important role. However, going forward the UNESCO OUV status will principally seek to protect and enhance the historic aspects of the site and will ultimately limit the extent to which new telescope infrastructure could be developed on the site particularly if this undermined those aspects of the site that were relevant to the early pioneering credentials of the property.

The UNESCO criteria also make it clear that the JBO represents an important interchange of human values over a **span of time** and on a global scale when it comes to radio astronomy. As such, this further reinforces the importance of clearly articulating how the facilities at JBO functioned during its pioneering role, how they function now, and how they will be utilised going forward into the future within the SPD.

UK Research and Innovation (UKRI) announced in July 2026 that it would withdraw its annual funding for JBO, which previously amounted to £2.8 million per year. UKRI stated that future investment would be directed towards projects delivering “the greatest long-term impact”. Funding for e-MERLIN will continue until May 2028, and the University of Manchester will continue to own and operate the Lovell Telescope. These changes indicate a diminishing operational role for JBO within the national research landscape.

The Square Kilometre Array Observatory (SKAO) headquarters is located at Jodrell Bank. The scientific data it relies upon is collected through the Square Kilometre Array (SKA) telescopes in South Africa and Australia, locations chosen specifically for their superior radio-quiet environments. The headquarters receives approximately £15 million fundings annually and employs almost 200 staff, with the majority funded through international contributions from SKAO member countries. The UK is investing £327 million into SKAO between 2021 and 2030[2].

[2] https://www.ukri.org/publications/what-stfc-is-investing-in/factsheet-jodrell-bank-e-merlin-and-ukri-funding/

Since the appended representations were issued, construction of the SKA Observatory commenced in December 2022[3] and it has also now reached its first construction and verification milestones, with the first 1,024 antennas now in operation and proven[4]. This evidence demonstrates that the future of radio astronomy is increasingly centred on international facilities rather than the Jodrell Bank telescope itself.

While we recognise the JBO site remains at the forefront of research activity, technological advances mean that the Jodrell Bank telescope itself no longer needs to be located on-site for JBO to fulfil its global scientific role. This further reinforces the reduced need for an extensive safeguarding zone, which dates back to 1973 at a time when Jodrell Bank was a critical site in terms of its advanced technology. In light of these global developments, significantly less weight should be afforded to the current consultation zone because superior technology elsewhere and far removed from Jodrell Bank now provides the most effective and efficient data.

Whilst we note that the 1973 Directive persists and the Council are required to consult with the University of Manchester on planning applications and development proposals within the zone, we consider the above facts and the new CEC Local Plan represents a clear milestone for the Council and the Government to undertake an independent and up to date review of the genuine implication towards delivering sustainable development within this part of the Borough vs the scientific impacts at a local and global scale.

We suggest that the new Local Plan should support development proposals where it can be clearly demonstrated that there would be no unacceptable heritage impact on JBO. Highgrove's land interest in Holmes Chapel lies on the fringe of the existing settlement boundary, and there is no visual or functional relationship between these sites and JBO. In this context, development in Holmes Chapel should not be constrained by the safeguarding zone where no heritage harm can be evidenced.

#5.145 New evidence

Highgrove support the preparation of new evidence to underpin the new Local Plan. We note the various evidence-based reports that are listed. The Council will also need to prepare or review the following:

- Updated Settlement edge review for those settlements that are not impacted by Green Belt
- Accessibility Toolkit evidence

[3] https://www.skao.int/en/news/441/ska-observatory-celebrates-start-telescope-construction-australia-and-south-africa
[4] https://www.skao.int/en/news/659/first-construction-milestone-australia

- An indoor built facilities study, playing pitch strategy update, and open space assessment and strategy.

Proposed local plan engagement strategy:

#6.51-6.56 Engaging with site promoters

It is encouraging that the Council seeks to work positively and proactively with the development industry to assess, select and refine development opportunities. A transparent, proportionate and plan-led approach is endorsed but this need not be at the expense of individual discussions. That said, it is acknowledged that to ensure fairness and avoid any perception of preferential treatment, the Council will only enter into discussions on the merits of individual sites at appropriate stages within the process. Engagement will be focused on clarifying process, evidence requirements, timescales and informing the development of site-specific policies in order securing the best outcomes for communities.

Highgrove are committed to providing as much information as possible on this Site, particularly how it can provide facilities for the community. When the Council come to consider sites in more detail, please do not hesitate to contact me using the details provided below so that swift and informative responses can be provided.

Conclusions

This representation has been prepared on behalf of Highgrove in response to the Council's consultation on the Local Plan Scoping documents. We understand that the scoping documents provide only a high-level overview at this early stage of engagement. Nevertheless, we have set out our views on the essential considerations that should inform the next stage of the plan-making process.

Highgrove support the preparation of a new Local Plan for Cheshire East and are committed to working constructively with the Council to help shape a strategy that increases the delivery of new homes across the borough. They wish to ensure that the Local Plan is evidence-based, positively prepared, and capable of meeting the needs of existing and future residents.

We would like to be kept informed of all forthcoming consultations on the Local Plan and any associated documents.

Yours sincerely

[redacted]

Graham Lamb

Senior Director - Planning

[redacted]

Enc.
Call for Sites Submission – Land at Manor Lane, Holmes Chapel
Representations to Draft Jodrell Bank SPD (February 2022)

P21_2639_L003v4_PL_MAN_KW_GL

27 March 2026

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

Submitted via email: *localplan@cheshireeast.gov.uk*

Dear Sir/Madam,

Land at Manor Lane, Holmes Chapel
A new local plan for Cheshire East: Call for Sites Submission
Highgrove Strategic Land Ltd

Introduction

Pegasus Group has been instructed on behalf of their client, Highgrove Strategic Land Ltd, ("Highgrove") to submit a call for sites submission to the new local plan for Cheshire East call for sites consultation which ran between 13th February – 31st March 2026.

Highgrove is promoting land at Manor Lane, Holmes Chapel, for residential allocation in the emerging Cheshire East Local Plan. The site has the ability to accommodate circa 60 dwellings (both market and policy compliant 30% affordable housing provision) and a residential care home/elderly accommodation.

Please note that Highgrove submitted representations to the previous Call for Sites consultation which ran between April – July 2024.

This updated Call for Sites submission confirms that Land at Manor Lane remains a highly suitable residential site for allocation – particularly noting the proposed changes under the new Draft NPPF (December 2025), which we discuss in further detail shortly.

The Site

The site comprises 8 acres (3.2 Ha) of agricultural land located to the east of Manor Lane adjacent to the urban boundary of Holmes Chapel, which is a Local Service Centre in the third tier of the currently adopted settlement hierarchy.

The site is bordered by Macclesfield Road (A535) and an existing residential dwelling to the north, undeveloped greenfield land to the east, residential dwellings to the south and Manor Lane to the west.

Please see **Figure 1** below for the site location.

Figure 1: Site Location



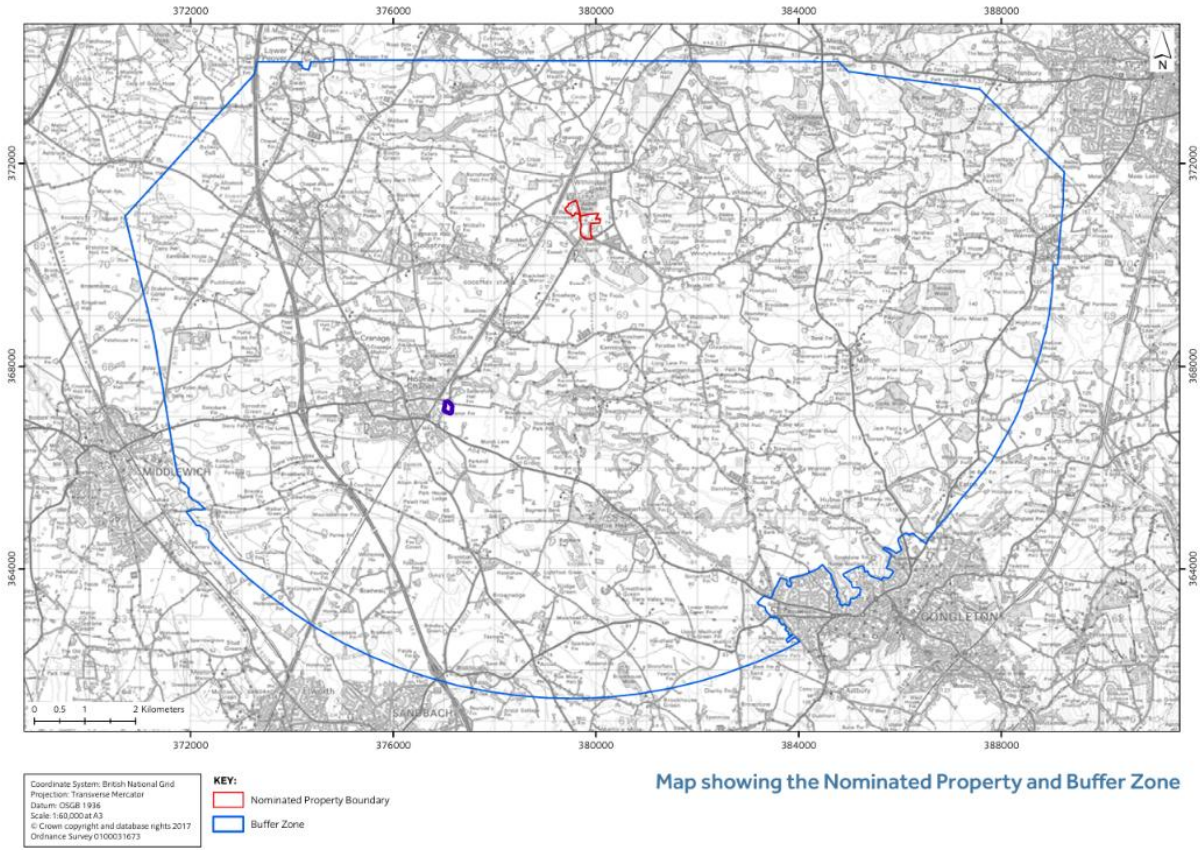
The site is flat arable land across two large fields separated by a thin hedgerow/ watercourse, with hedgerow and scattered trees around the perimeter of the site. The site is not located within the Green Belt.

In terms of key site characteristics, these are summarised as follows:

- **Access:** The site benefits from an extensive road frontage with Manor Lane to the west, which provides a number of access options. A highways consultant will be appointed in due course to advise on detailed site access options. No Public Rights of Way are located on site, but there is a bridleway running along the northern boundary.

- **Heritage:** There are no listed buildings or Conservation Areas located within the site boundary, nor in close proximity. The site is located within the Consultation/Buffer Zone of the Jodrell Bank World Heritage Site, which covers an extensive land area. We cover this matter in further detail within our Deliverability Assessment. Please see Figure 2 below for details – with the blue line denoting the Buffer Zone and Manor Lane site location shown by purple line.

Figure 2: Jodrell Bank World Heritage Site Consultation/Buffer Zone



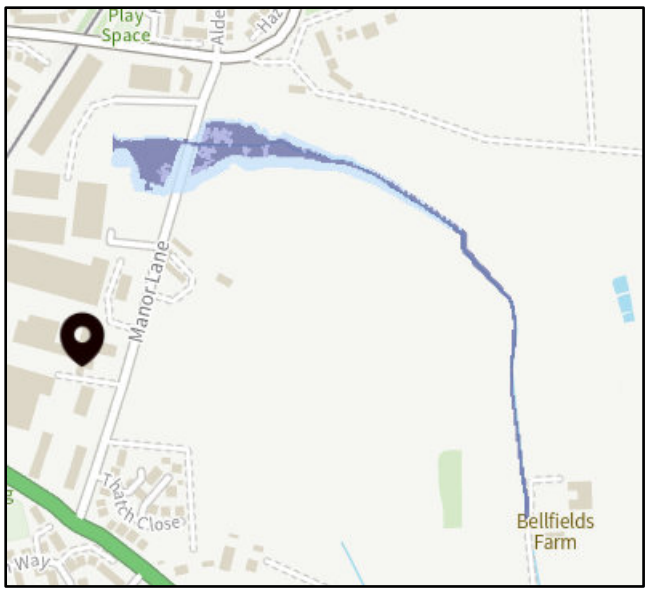
Map showing the Nominated Property and Buffer Zone

- **Landscape:** The site is not covered by any statutory landscape designations, such as SSSIs, SACS etc.

- **Trees:** There are no protected trees (TPOs) located on site.

- **Flood Risk:** The vast majority of the site is located within Flood Zone 1 (lowest probability of flood risk), with a central section of the site located within Flood Zone 3 (see Figure 3 below):

Figure 3: Extract of online flood map for planning



This is not considered to pose a major constraint on site – with any future Masterplan ensuring built development is located outside the areas of Flood Zone 3. The section of the site located within Flood Zone 3 could be utilised for blue/green infrastructure/Biodiversity Net Gain purposes.

Surrounding Area/Sustainability Credentials

The site is extremely well located in relation to existing local services and facilities in the area, including:

- Aldi Store: located directly opposite the site (within 100m), on Manor Lane to the west.
- Holmes Chapel Railway Station: located just 500-600m to south-west of the site (within an 8-minute walk). Direct trains run to Manchester City Centre twice an hour, taking 43 minutes.
- Bus Stops: On Manor Lane directly outside the site (within 100m) with regular services via the no 42 to Congleton and Crewe.
- Hermitage Primary School: located just 800m to the north-west of the Manor Lane site and can be accessed within a 10-minute walk.

- Holmes Chapel Local Centre: Is located within a 1km walk, including convenience stores, pubs, restaurants etc as well as a health centre and library.

- Manor Point: Mixed-Use Business Park located to immediate west on Manor Lane, which provides employment opportunities.

It therefore represents a highly logical and sustainable housing site. The sustainability credentials of the site are particularly important noting the proposed changes to the NPPF – as discussed below.

Draft NPPF Changes: Site Assessment against Policy S5

Policy S5 (Principle of development outside settlements) of the new Draft NPPF, which was recently subject to consultation which closed on 10th March 2026, proposes to significantly boost the supply of housing in sustainable locations located outside of defined settlement boundaries.

Policy S5 states that only certain forms of development should be approved outside settlements, as set out in the following list. These should be approved, unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework. Part h. of the policy then states:

> *"Development for housing and mixed-use development which would be: within reasonable walking distance of a railway station which provides a high level of connectivity to jobs and services[1]; physically well-related to a railway station or a settlement within which the station is located; is of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure; and where the development would not prejudice any proposals for long-term comprehensive development in the same location"*

Land at Manor Lane complies with the requirements of Policy S5, as:

- The site is within reasonable walking distance of a railway station which provides a high level of connectivity to jobs and services: Holmes Chapel Railway Station is located 500-600m from the site, which can be accessed on flat, well-lit roads with consistent footways.

- Holmes Chapel Railway Station falls within the Crewe Travel to Work Area (TTWA), which is a top 60 TTWA.

[1] Footnote 26 states: *Well-connected rail stations and underground, tram and light rail stops are those in a top 60 Travel to Work Area located partially or fully within England by Gross Value Added (GVA) and which, in the normal weekday timetable, are served (or have a reasonable prospect of being served due to planned upgrades or through agreement with the rail operator) throughout the daytime by four trains or trams per hour overall, or two trains or trams per hour in any one direction.*

- Two trains per hour operate from Holmes Chapel in each direction. The station falls on the Crewe-Manchester line – with two trains per hour to Manchester and two trains per hour to Crewe.

- The site is physically well-related to a railway station or a settlement within which the station is located – being located directly adjacent to the defined settlement boundary of Holmes Chapel in the adopted Local Plan.

- The site is of modest scale, therefore of a scale which can be appropriately and suitably accommodated.

- The site would not prejudice any proposals for long-term, comprehensive development in the same location.

As explained below in the enclosed Deliverability Assessment, there are no development constraints that would result in adverse impacts substantially outweighing benefits – noting that a mitigation scheme can be explored in respect of Jodrell Bank.

It is also important to note part J) of draft policy S5 states:

> *"Development which would address an evidenced unmet need (including, but not limited to, development proposals involving the provision of housing where the local planning authority cannot demonstrate a five-year supply of deliverable housing sites or scores below 75% in the most recent Housing Delivery Test), and where the development would:*
>
> *i. be well related to an existing settlement (unless the nature of the development would make this inappropriate) and be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure; or*
>
> ii. *comprise major development for storage and distribution purposes which accords with policy E3."*

Land at Manor Lane also meets this criterion – being well related to the existing settlement of Holmes Chapel and of an appropriate scale, as already discussed.

It is also notable that whilst criterion h) does not require a five-year housing land supply deficit in order for development to be deemed acceptable, criterion j) does. Cheshire East is facing a substantial housing land supply shortfall, with a supply of **3.31 years** stated in the January 2026 Consultation Draft – Housing Monitoring Update 2024/25, equating to a shortfall of **4,449 dwellings.**

In summary, given the above and the fact that Land at Manor Lane meets the requirements of both criteria h and j of Policy S5 in the Draft NPPF, which is likely to be adopted later in 2026, with no current suggestion that this policy will fall way, this further supports the case to allocate the site for residential development in the emerging Local Plan.

The Case for Further Growth in Holmes Chapel

The site is located on the edge of the defined settlement of Holmes Chapel and represents a logical extension to this settlement.

Holmes Chapel is identified as one of thirteen Local Service Centres within the adopted Local Plan Strategy (LPS) under the stated settlement hierarchy within Section 8 and Policy PG 2. Paragraph 8.30 of the LPS confirms that each of the thirteen Local Service Centres have a primary school and a range of services and facilities to help meet the needs of local people, including those living in nearby settlements. However, only Holmes Chapel and Shavington have a Secondary School and therefore have an elevated education provision to meet the resident's needs. The paragraph goes on to confirm that new development is required to meet local needs and help retain services and facilities so that residents can continue to enjoy these benefits and reduce travel elsewhere.

The Vision for Local Service Centres, the states:

> ***'In the Local Service Centres, some modest growth in housing and employment will have taken place to meet locally arising needs and priorities, to reduce the level of out-commuting and to secure their continuing vitality. This may require small scale alterations to the Green Belt in some circumstances.'***

In the case of Holmes Chapel, it is not surrounded by Green Belt and therefore growth can be accommodated without having to demonstrate 'exceptional circumstances'. Moreover, it is recognised at paragraph 8.34 of the LPS that the village of Goostrey adjoins Holmes Chapel and it is anticipated that the needs of Goostrey will be met in Holmes Chapel because it is larger and has a wider range of services.

It is also pertinent to point out that of the thirteen Local Service Centre's identified within the LPS Settlement Hierarchy, only 10 of these settlements (including Holmes Chapel) are actually defined as a Local Centre within the adopted retail hierarchy set out in Policy RET 1 of the Site Allocations DPD (SADPD).

Holmes Chapel is also a location where the Council have identified employment allocations within the SADPD, further demonstrating that it is a settlement that includes a range of other employment opportunities.

Despite not being afforded any housing allocations within the adopted Local Plan, during the Local Plan period and from 2010, it is confirmed in the Council's 2024 Housing Completions and Supply Report (31 March 2024) that **816 dwellings** have been delivered in Holmes Chapel and there is a supply of a further **58 dwellings** on sites with planning permission all through windfall development. There are no remaining options for future growth to meet development needs within and beyond the current plan period as set out in the adopted Local Plan.

This needs to be remedied and addressed in the new Local Plan so Holmes Chapel benefits from a planned and sustainable growth strategy so it can remain a vital and vibrant centre with a range of services that can meet the needs of its residents and surrounding hinterland.

At the time of preparing the adopted LPS and as set out in the Council's Settlement Hierarchy Report dated 2010, we note that Holmes Chapel ward had:

- A population of **5,830**
- **2,291** households,
- A self-containment level of 28% (i.e. those living and working within the settlement), and
- **44 retail units**.

In 2021, Holmes Chapel Ward was merged with Dane Valley but using Lower Super Output areas, that match the former ward, we can confirm it had:

- A population of **6,795**, and
- **2,846** households.

Within the Retail Topic Paper supporting the previous New Local Plan Issues Report consultation (dated April 2024), we also note that Holmes Chapel at the time of writing had **56 units** and a **vacancy rate of 1.8%**.

The wider Dane Valley Ward that includes the nearby villages of Goostrey, Cranage and Twemlow Green had a population of 10,400 and 4,400 household in 2021 (rounded to the nearest 100). This further demonstrates that the settlement of Holmes Chapel continues to serve a larger population.

In terms of self-containment, the 2021 Census demonstrated a much higher rate of working from home, but this was skewed by the pandemic lockdown at the time so there isn't comparable data in this regard.

Nonetheless, the above figures reflect the growth within the settlement since 2010 and the start of the adopted plan period and indicate that the settlement remains a suitable location for continued sustainable growth that should continue through to the next Local Plan with new housing allocations, including this site.

Deliverability Assessment

Paragraph 72 of the 2024 NPPF requires strategic policy-making authorities to supply sufficient specific deliverable sites to deliver housing in the first five years following the intended date of adoption, with the glossary at Annex 2 confirming that:

> *"To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years…"*

This is a judgement about the economic viability of a site and the capability of a developer to provide housing within a defined period, taking into account marketing, cost and deliverability factors. Accordingly, we consider the deliverability of the site in this context with reference to the relevant supporting guidance in the PPG (paras 3-018-20190722 - 3-021-20190722).

Available

Highgrove has a legal agreement with the Landowner to promote the site and there are no ownership constraints which would prevent or delay the site coming forward for development. Highgrove is actively promoting the site for residential allocation as part of the emerging Local Plan process. Highgrove has a strong record of delivering strategic sites and the site must be regarded as available.

Suitable

The NPPG (para 3-018-20190722) confirms that a site can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated, listing the following considerations:

- national policy;
- appropriateness and likely market attractiveness for the type of development proposed;
- contribution to regeneration priority areas; and
- potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation.

The NPPG requires that the suitability of sites should be guided by the Development Plan, emerging plan and national policy; as well as the market and industry requirements in the housing market area (Ref: 3-018-20190722).

<u>National Policy</u>

Adopted

NPPF Paragraph 16 outlines how plans should be prepared in a way that is aspirational but deliverable. Paragraph 85 also states how planning policies should help create the conditions in which businesses can invest, expand and adapt. Furthermore, paragraph 86 confirms that planning policies should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.

Highgrove submitted representations to the Local Plan Issues Paper Consultation which asserted that a housing requirement higher than the currently Local Plan figure should be pursued as part of the emerging Local Plan. This is for numerous reasons, including the fact that over the course of the current plan period, jobs growth has averaged 1.1% per annum which is significantly higher than the 0.7% jobs growth the adopted plan was predicated on which led to the adopted Local Plan. In light of this, a higher housing target is absolutely critical in delivering economic growth and the two are closely aligned. This will in turn necessitate the need to allocate additional sustainable and suitable housing sites such as Manor Lane for residential development.

It is important to note that the Manor Lane site is not located within the designated Green Belt. Whilst the strong case for higher housing growth will necessitate the allocation and delivery of both Green Belt and non-Green Belt sites, Manor Lane is preferrable in planning policy terms due to being located within the open countryside in a sustainable location directly adjacent to Holmes Chapel settlement boundary.

Emerging

As previously discussed, Manor Lane also accords with criteria h) and j) of draft Policy S5 of the emerging NPPF. Draft Policy S5 proposes to significantly boost the supply of housing in sustainable locations located outside of defined settlement boundaries, and the site's compliance with this emerging policy further bolsters the case to formally allocate the site for residential development in the emerging Local Plan.

Appropriateness and Market Attractiveness

One significant consideration in terms of the appropriateness of a site is its level of locational sustainability and access to services. As noted earlier in the 'surrounding area' section, the site benefits from an excellent location in relation to a range of local amenities including Holmes Chapel Railway Station and local shops.

In terms of market attractiveness, Highgrove's interest suggests that it is in an attractive market location and a suitable location for residential development from a commercial perspective. Indeed, the Land Agent regularly receives speculative approaches from housebuilders and several major care groups who have expressed strong market interest in the site. The Landowners have also advised that there is significant under supply of care provision for the elderly in Holmes Chapel.

Contribution to Regeneration Priority Areas

Development in this area is not a specific regeneration priority, but allocating residential development in this area will encourage higher value aspirational housing, which will make a wider contribution to Cheshire East in terms of Council Tax receipts; whilst additional household spending will help support local services and facilities within other regeneration priority areas.

It is also important to note that the site can provide 30 % affordable housing provision. This will be a significant benefit to the local community, where there is strong affordable housing demand.

Indeed, Cheshire East's Housing Department have advised that as of 11th June 2024, there were 164 families formally registered as seeking affordable housing in Holmes Chapel. The delivery of affordable housing provision on this site will make an important contribution to meeting this need.

Potential Impacts (Landscape, Nature and Heritage Impacts)

As confirmed earlier in this letter, the two key site considerations are flood risk and the site's location within the Jodrell Bank World Heritage Site Buffer/Consultation zone. In terms of flood risk, the vast majority of the site is located within Flood Zone 1 (lowest probability of flood risk), with a central section of the site located within Flood Zone 3 (and being subject to medium and high surface water flooding). This is not considered to pose a major constraint on site – with any future Masterplan ensuring built development is located outside the areas of Flood Zone 3, with surface water flood risks to be managed via Site Specific Flood Risk Assessment in line with NPPG paragraph 27[2]. The section of the site located within Flood Zone 3 could be utilised for blue/green infrastructure/Biodiversity Net Gain purposes.

Furthermore, detailed technical work has previously been undertaken on the site in respect of drainage and highway matters. The technical reports confirmed that development of the site is entirely suitable and viable, further highlighting the deliverability of the site.

Jodrell Bank

As previously noted, the site is located within the Jodrell Bank World Heritage Site (WHS) Buffer Zone – which covers an extensive land area including Holmes Chapel. Whilst the site is not located within the boundaries of the WHS itself, Policy HER 9 (Jodrell Bank World Heritage Site) of the Site Allocations and Development Policies Document states the following:

> *1. Development proposals within the Jodrell Bank World Heritage Site, its buffer zone or its setting will be supported where they preserve those elements of significance that contribute to Jodrell Bank's Outstanding Universal Value, including its authenticity and integrity.*
>
> *2. Development proposals within the Jodrell Bank World Heritage Site, its Buffer Zone or its setting that would lead to substantial harm to its significance should be wholly exceptional and will only permitted in the circumstances set out in national planning policy. Proposals leading to less substantial harm should be weighed against the public benefits of the proposal. In all cases, the assessment of harm should take into account the relative significance of the element affected and its contribution to the significance of the Word Heritage Site as a whole.*

[2] Reference ID 7-027-20220825

3. Development proposals affecting the Jodrell Bank World Heritage Site must be accompanied by a heritage statement. Consistent with LPS Policy SE 14 'Jodrell Bank', this should address:

i. the effect of any development proposal falling within the Observatory's Buffer Zone on the operational efficiency of the telescopes through radio interference; and

ii. the effect of any development proposal on all other historic attributes of the Observatory, including its setting

This matter will be addressed in further detail in future representations made by Highgrove as the emerging Local Plan progresses. As a starting point, it is important to highlight that the WHS Buffer Zone should not prevent the allocation of suitable and sustainable development sites. Indeed, there are a number of recent developments that have been permitted within the Buffer Zone, including most recently a Richborough scheme (planning application reference: 25/2500/OUT) located at Land at Sandbach Road, Congleton. It was resolved that planning permission be granted for the scheme at 5th March 2026 strategic planning committee for the following description of development:

"Outline planning application with all matters reserved except for Access, for residential development of up to 120 dwellings with public open space, associated landscaping and the formation of new access off Sandbach Road"

Notably, whilst the University of Manchester objected to the scheme with concerns that development would impair the efficiency of the telescopes, the development was still deemed to be acceptable in the overall planning balance. Paragraph 9.111 of the committee report states that:

"In accordance with policy SE 14 and the draft SPD, this could be mitigated by imposing a condition for specialised construction techniques. This is a similar approach taken on application 19/5596C Viking Way (approved 2nd February 2022). The reserved Matters application 22/0670C, also off Viking Way, included a Jodrell Bank Layout Plan to suitably address these concerns to the northern-facing facades of the dwellings."

We also note the Bloor Homes scheme (17/5573C) for 131 dwellings in Congleton, which has an approved plan showing wall insulation details, including aluminium foil, to mitigate impact/interference on radio transmission frequencies.

It is therefore clear that a suitable mitigation strategy and mitigation details can be appropriately provided in due course to address the policy requirements of Policy HER 9. The location of the site within the Jodrell Bank WHS Buffer Zone does not therefore represent a constraint which would prevent the allocation of the Manor Lane site – as mitigation details can be provided and secured through any future planning application.

Furthermore, Pegasus previously submitted detailed representations to the draft Jodrell Bank SPD, which was consulted on between December 2021-February 2022 (and has not yet proceeded to adoption). The representations are contained in full at **Appendix 1.** Of particular note, the

representations raised comments regarding the future of Jodrell Bank and how it is likely to function as a hub of data analysis rather than the collection of data itself (because of new, state of the art radio telescopes which are being developed elsewhere). The following paragraphs from the representations are of note:

> *"14. Almost no information is provided within the SPD relating to the future role of JBO, despite this also being an important consideration for decision makers going forward. The SPD should make clear reference to* ***its future role in attaining and analysing scientific data about our universe as part of the Square Kilometre Array project.*** *Whilst paragraph 1.12 makes reference to this project and notes that Jodrell Bank hosts the international headquarters, no further information is provided. Greater context should be provided for the benefit of the community, developers and decision makers. Indeed, the scale and international importance of the SKA project is significant in the context of JBO.*
>
> *15. In this regard, we note that* ***many hundreds of state of the art radio telescopes are being developed in radio silent areas*** *including the Karoo desert region in South Africa and within the Australian outback. As noted on the SKA website:*
>
> *'The SKA is being developed over a phased timeline. Pre-construction development officially started in 2013 and has taken place over a period of seven years, involving the detailed engineering design and governance work needed to bring the SKA to construction readiness. Construction of the SKA is scheduled to begin in 2021, while routine science observations are expected to start in the late 2020s.*
>
> *In Australia, the SKA's low-frequency telescope should initially comprise 512 stations arranged in a large core with three spiral arms, spread over a distance of 65km. Each station will contain 256 individual antennas, representing more than 130,000 antennas in total.*
>
> *In South Africa, 133 dish antennas shall be added to the existing 64-dish MeerKAT precursor telescope, totalling nearly 200 dishes to form the SKA's mid-frequency telescope array. Most dishes will be concentrated in a core, with three spiral arms extending over 150km.*
>
> *This forms part of the "design baseline", an agreed description of the attributes of the telescope.*
>
> *However, unlike single dish telescopes, the scalable nature of interferometers like the SKA means that more antennas can be added over time to increase its capability. The ultimate vision of the scientific community is to expand the SKA further across both sites and into other African countries. Such vision is commonly known as full SKA.'*
>
> *17. Importantly,* ***the SKA will set the new technological benchmark for collecting data and JBOs importance as the international hub for analysing data collected from elsewhere*** *across the globe should be fully recognised within the SPD. This context, including the timescales associated with the SKA, is deemed to be very important in*

understanding how developments within the JBO consultation zone will a) impact on JBO's efficiency (see criteria 1 of the SE14) and b) understanding the site's universal value (see draft policy HER9)

18. Clearly if JBO is to function as the international hub for analysing data collected from other telescopes around the world, we recognise that it is important that the Lovell telescope also continues to offer valuable training and research functions for those based at the international hub at JBO. However, ***we think it is fair to say that overtime, rather than being at the forefront of attaining data (as per its unequivocally important historical past), it will increasingly be at the forefront of data analysis****. That function seems perfectly fitting given the age of JBO, the extent and rate at which technological advancement takes place, and the fact that it does not sit within a radio silent area at present.*

In short, better technology is coming forward elsewhere in the world and Jodrell Bank's role in the future will be less about data collection from the telescope and more about becoming a centre of excellence for scientists to collect and review data from newer, more advanced telescopes elsewhere. This, in turn, will result in less sensitivity regarding the protection of telescope efficiency, given Jodrell Bank will likely function as a data collection centre.

Accordingly, initial assessments confirm that there are no physical or technical constraints preventing development of this site. A professional team of technical experts will be appointed to underpin this assessment and support the delivery of the site moving forward.

Development of the site is therefore suitable in accordance with the NPPF and the NPPG.

Achievable

Highgrove has reviewed the economic viability of the proposal in terms of the attractiveness of the locality, potential market demand as well as the cost factors associated with the site including preparation costs and constraints and consider the site is not constrained from a viability perspective. In terms of market and industry requirements, the interest in this site by Highgrove confirms that this is a suitable location for housing development from a commercial perspective, is in an attractive market location, and that this is a desirable location to live.

Highgrove can therefore confirm that the development of the site is economically viable in accordance with the NPPF and NPPG. As a consequence, the company is committed to investing in the site and is confident that residential-led development could be delivered on this site in the short term.

Deliverability Conclusions

This assessment has confirmed that the site is available, suitable and achievable in accordance with the latest national guidance and should therefore be considered for residential allocation.

Conclusions

To conclude, land at Manor Lane, Holmes Chapel represents a highly suitable and sustainable residential site. It is sustainably located directly adjacent to the existing Holmes Chapel settlement boundary – which is designated as a Local Service Centre in the currently adopted Local Plan. No housing sites are formally allocated in Holmes Chapel in the current Local Plan – a matter which must be addressed as part of the emerging Local Plan to ensure a sustainable and appropriate level of growth for Holmes Chapel. The Manor Lane site represents a highly logical housing site for allocation.

Proposed changes under the December 2025 consultation draft NPPF are also highly pertinent. The site accords with criterion h) and j) of draft Policy S5 – which is looking to significantly boost housing delivery on sustainable sites currently located outside of defined settlement boundaries. This further bolsters the case to allocate the site for residential development in the emerging Local Plan.

The site benefits from excellent sustainability credentials and the Deliverability Assessment confirms that there are no physical or technical constraints preventing this site coming forward for residential development. The site can deliver circa 60 dwellings and a residential care home/elderly accommodation. A Masterplan will be provided as part of future rounds of consultation in due course.

I trust that the contents of this letter are clear. We look forward to engaging further with the Council on the Manor Lane site and should you have any questions, please do not hesitate to get in to contact on the details provided below.

Yours faithfully,

Kerry Walker
[redacted]
Associate Planner
[redacted]

Encs.

Appendix 1: Representations to Draft Jodrell Bank SPD (February 2022)

Objection

Project Name:	Jodrell Bank SPD Reps
Date:	3rd February 2022

OBJECTION ON BEHALF OF REDROW HOMES, TATTON ESTATE AND HIGHGROVE STRATEGIC LAND TO THE JODRELL BANK OBSERVATORY SPD PREPARED BY CHESHIRE EAST COUNCIL, DECEMBER 2021

Introduction

1. Overall, we welcome the notion and introduction of a Supplementary Planning Document (SPD) to provide more guidance on how the impact of development on the Jodrell Bank Observatory (JBO) will be considered. We also support the recognition that impacts of development can be mitigated through certain forms of construction and the use of planning conditions. Both elements are necessary to ensure a consistent approach is taken in determining planning applications with the Jodrell Bank Consultation Zone and so applicants, the community and decision makers are fully informed on what is a very technical issue.

2. However, we do have a number of key concerns and recommendations in relation to:

a) the SPD's timing: i.e. we consider the SPD consultation is premature in light of the fact that the Site Allocations Development Plan Document (SADPD) has yet to be adopted and it would appear that some main modifications are required to Policy HER 9, which have yet to be drafted and consulted upon but these will be directly relevant to this SPD.

b) the background context set out within the SPD: i.e. some of the background to the UNESCO Universal Outstanding Value status is incomplete. Fuller quotes should be provided in relation to the Criterion and links to key decision documents associated with the UOV should be made available within the SPD. We also consider that the future role of JBO should be better explained in light of the Square Kilometre Array because once operational this will represent a landmark event for Jodrell Bank and its future that is relevant to decision makers.

c) the mapping associated with the consultation zone: i.e. an accurate plan should be provided that clearly illustrates not just the entire consultation zone but the inner and outer zones relevant to the 1973 Direction. See plan provided at **Appendix 1** of our reps.

d) the methodology for assessing the impact of new houses on the efficiency of

JBO: i.e. we consider the very low ITU thresholds being suggested in relation to what would constitute an adverse impact on the efficiency of the telescope have been taken out of context, and fail to accurately and proportionately highlight the material impact on the operation of the telescope because the ITU threshold is already exceeded in Cheshire East by many thousands of times.

e) the impartiality of the SPD and proposed decision making process (i.e. we are concerned that overall approach proposed has potential bias built into it on the basis that the University of Manchester (UoM) have drafted the methodology relating to the impact on the efficiency of the telescope, and have a vested interest in JBO and will be a statutory consultee on all relevant planning applications. Coupled with the fact that the Council do not have specialist in house and this is a very technical issue, the Council must take representations towards the SPD and methodology very seriously and in our view, it is important that an impartial peer review of the draft SPD is carried out (e.g. via UKAS).

f) lack of detail provided on mitigation techniques: i.e. we consider it would be very helpful if greater detail should be provided within the SPD relating to potential construction techniques and model conditions that will be utilised on planning applications to ensure the right type of mitigation is carried out and how the potential removal of permitted development rights on new development proposals might be used. This will be particularly important for SME businesses and householders as well as the larger organisations we represent.

g) lack of a monitoring and review process: i.e. we consider it should be made clear within the SPD that the Council will monitor the level of planning permissions (including prior approval applications) within the Consultation Zone and there should also be a full review of the SPD and Consultation Zone at the time of preparing a new Local Plan and/or once the Square Kilometre Array developments located elsewhere become operational.

Timing

3. As per other representations we have made towards recent SPD's released by the Council for consultation, we still consider that formal consultation should not take place until the SADPD has been adopted because policies within the SPD should inform the interpretation of some of those policies as well.

4. Whilst we note that Policy SE14 Jodrell Bank already forms part of the adopted development plan, emerging Policy HER9: World Heritage Site is also a critical policy the SPD seeks to address and provide clarification on. There is a clear danger that this consultation is therefore premature as it is difficult to fully meaningful comments until the HER9 policy has been adopted. Should policy HER9 alter between now and adoption of the SADPD, we would call for a further consultation to take place on the SPD. To not do so, would limit the weight that could be afforded to the SPD going forward.

5. In this regard, we note that the Inspector's initial letter on the SADPD released this week has highlighted the need to alter Policy HER9 as a Main Modification, which reinforces

our point on this matter, particularly given we do not know precisely how Policy HER 9 will now be worded and that component of the SADPD will need to be reconsulted upon, along with all other Main Modifications towards that plan.

Purpose and Scope of the SPD and Context of JBO

6. The SPD clearly seeks to deal with very technical matters and provide guidance on how to assess the impact on the efficiency of the telescope at JBO and assess the impact on its UNESCO status as a World Heritage Site. With that in mind we feel that it is important that the background context of the UNESCO status is accurately set out within the SPD and we feel it would be helpful if the main body of the SPD quoted various parts of the World Heritage Committee papers and included them in full as Appendices or as accessible web links as these will be important considerations for any decision maker going forward[1].

7. In particular, we feel the Criterion cited within the World Heritage Committee papers would be best quoted in full in the main body of the SPD and within the initial sections of the document. We have included the full text of the four criteria below:

- ***Criterion (i):*** *Jodrell Bank Observatory is a masterpiece of human creative genius related to its scientific and technical achievements. The adaptation and development of radar and radio frequency reflectivity to develop radically new equipment, such as the Transit Telescope and Lovell Telescope, were a key part in the development of entirely new fields of scientific research and led to a dramatic change in the understanding of the Universe. The Observatory was important in the pioneering phase and later evolution of radio astronomy.*

- ***Criterion (ii):*** *Jodrell Bank Observatory represents an important interchange of human values over a span of time and on a global scale on developments in technology related to radio astronomy. The scientific work at Jodrell Bank was at the heart of a global collaborative network. In particular, several important technological developments such as very large paraboloidal dish telescopes and interferometer were developed at the Observatory, and were later influential in scientific endeavours in many parts of the world.*

- ***Criterion (iv):*** *Jodrell Bank Observatory represents an outstanding example of a technological ensemble which illustrates a significant stage in human history (1940s-1960s) – the transition from optical astronomy to radio astronomy and the associated consequence for the understanding of the Universe through multi-wavelength astrophysics. The property is also associated with the peacetime development of 'Big Science' as a major change in the way in which scientific research was supported and undertaken. The surviving evidence at the property related to the evolutionary development of radio astronomy from the post-war pioneering phase through to sophisticated, large scale research activity in the field makes Jodrell Bank an outstanding example of such a technological ensemble.*

- ***Criterion (vi):*** *Jodrell Bank Observatory is directly and tangibly associated with events and ideas of outstanding universal significance. The development of the new field of radio astronomy at the property lead to a revolutionary understanding of the Universe which was only possible through research beyond the possibilities of*

[1] i.e. those noted on the front page of the paper at Appendix 2 of the SPD including WHC/19/43.COM/8B and WHC/19/43.COM/INF.8B1.

optical astronomy to explore the electromagnetic spectrum beyond visible light. Understanding of the nature and scale of the Universe has been dramatically changed by research in radio astronomy at the Observatory.

8. We consider some of the language used in this early part of the SPD is either inaccurate or incomplete. For instance, paragraph 1.14 states:

'JBO was designated as a UNESCO WHS in July 2019 and great care must be taken to make sure that development of the site and within the consultation zone does not harm the significance and operational functionality of the telescope.'

9. However, none of the WHC reports actually state this. Instead, what is clear from the above Criterion is that much of the OUV status is derived from the relatively complete nature of JBO and the relevance of past findings and observations and how they have furthered human understanding of the universe. No reference of the Consultation Zone or the future role of JBO is highlighted within the Criterion above. Instead, the buffer zone and its context is referred to as follows elsewhere in the reports:

'The Consultation zone, buffer zone of the property, protects the scientific capabilities of the Observatory from radio emissions in its vicinity, contributing to maintenance of the functional integrity of the property…

…The buffer zone is based on the Jodrell Bank Radio Telescope Consultation Zone which has operated effectively to protect the Observatory for many decades. It was established by the Town and Country Planning (Jodrell Bank Radio Telescope) Direction 1973.'

10. *Within the background WHC paper there is also reference to the site's isolated rural location,* ***'which required an absence of radio interference'*** *(note past tense). It is also noted that* ***'The ongoing scientific use of the Observatory is an important attribute reflecting the continuity of research'.*** However, it is important to highlight that the WHC reports do not specifically refer to the ongoing efficiency of the telescopes themselves nor does it rule out other forms of research being the mainstay function of JBO going forward. Indeed, the recommendations to the State Party offered as part of the OUV status states the following:

'Recommends that the State Party give consideration to the following:

a) Providing a summary end of project report following completion of the current major conservation project,

b) Confirming the timeframe for the conservation of the two Botany Huts,

c) Continuing to respect and portray the historical character of the buildings and site development. This character often includes relatively primitive buildings, often with additions undertaken with little regard to aesthetics or quality construction,

d) Providing the revised Conservation Management Plan and associated Site Gazetteer when completed, to the World Heritage Centre,

e) Considering master planning for the property and buffer zone to anticipate possible future development needs.'

11. As such, whilst protecting the efficiency of the telescope is an important part of Policy SE14 of the Local Plan and the ongoing use of the JBO for scientific purposes was a consideration in determining the UNESCO UOV status, it is not strictly true to suggest that the preserving the current efficiency/status quo of the radio telescope is absolutely paramount to the heritage status of the site. Indeed, the above recommendation suggests that the WHC were open to some change being necessary within the Consultation Zone / Buffer Zone to meet anticipated possible future development needs but this should be master planned appropriately.

12. Such observations have to be correct because there is no evidence within the WHC reports in relation to the extent to which the buffer zone has protected the observatory's functionality/efficiency or what the baseline position is in relation to interference. There is also no reference to the existing communities located within the buffer zone within the WHC reports. Instead, the vast majority of the WHC reports and findings relate to the JBO site itself, the physical structures within it and past observations. Overall, the WHC reports highlight how JBO was at the very forefront of events and ideas of outstanding universal significance and continues to play an important role. However, going forward the UNESCO OUV status will principally seek to protect and enhance the historic aspects of the site and will ultimately limit the extent to which new telescope infrastructure could be developed on the site particularly if this undermined those aspects of the site that were relevant to the early pioneering credentials of the property.

13. As noted above, the UNESCO criteria also make it clear that the JBO represents an important interchange of human values over a **span of time** and on a global scale when it comes to radio astronomy. As such, this further reinforces the importance of clearly articulating how the facilities at JBO functioned during its pioneering role, how they function now, and how they will be utilised going forward into the future within the SPD.

14. Almost no information is provided within the SPD relating to the future role of JBO, despite this also being an important consideration for decision makers going forward. The SPD should make clear reference to its future role in attaining and analysing scientific data about our universe as part of the Square Kilometre Array project. Whilst paragraph 1.12 makes reference to this project and notes that Jodrell Bank hosts the international headquarters, no further information is provided. Greater context should be provided for the benefit of the community, developers and decision makers. Indeed, the scale and international importance of the SKA project is significant in the context of JBO.

15. In this regard, we note that many hundreds of state of the art radio telescopes are being developed in radio silent areas including the Karoo desert region in South Africa and within the Australian outback. As noted on the SKA website,

'The SKA is being developed over a phased timeline. Pre-construction development officially started in 2013 and has taken place over a period of seven years, involving the detailed engineering design and governance work needed to bring the SKA to construction readiness. Construction of the SKA is scheduled to begin in 2021, while routine science observations are expected to start in the late 2020s.

In Australia, the SKA's low-frequency telescope should initially comprise 512 stations arranged in a large core with three spiral arms, spread over a distance of 65km. Each station will contain 256 individual antennas, representing more than 130,000 antennas in total.

In South Africa, 133 dish antennas shall be added to the existing 64-dish MeerKAT precursor telescope, totalling nearly 200 dishes to form the SKA's mid-frequency telescope array. Most dishes will be concentrated in a core, with three spiral arms extending over 150km.
This forms part of the "design baseline", an agreed description of the attributes of the telescope.

However, unlike single dish telescopes, the scalable nature of interferometers like the SKA means that more antennas can be added over time to increase its capability. The ultimate vision of the scientific community is to expand the SKA further across both sites and into other African countries. Such vision is commonly known as full SKA.'

16. We consider the above text should be provided within the SPD to ensure applications, the communities affected by the JBO and decision makers are better informed.

17. Importantly, the SKA will set the new technological benchmark for collecting data and JBOs importance as the international hub for analysing data collected from elsewhere across the globe should be fully recognised within the SPD. This context, including the timescales associated with the SKA, is deemed to be very important in understanding how developments within the JBO consultation zone will a) impact on JBO's efficiency (see criteria 1 of the SE14) and b) understanding the site's universal value (see draft policy HER9).

18. Clearly if JBO is to function as the international hub for analysing data collected from other telescopes around the world, we recognise that it is important that the Lovell telescope also continues to offer valuable training and research functions for those based at the international hub at JBO. However, we think it is fair to say that overtime, rather than being at the forefront of attaining data (as per its unequivocally important historical past), it will increasingly be at the forefront of data analysis. That function seems perfectly fitting given the age of JBO, the extent and rate at which technological advancement takes place, and the fact that it does not sit within a radio silent area at present.

19. Indeed, whilst located in a rural area, JBO is still within one of the most densely populated and affluent countries in the world and there are numerous existing settlements within close proximity to the telescope and within the consultation zone. Much of the SPD highlights how the existing population/dwellings/business and associated electronic equipment within and outside of the JBO consultation area impacts on the efficiency of the

telescope. Indeed, at Appendix 3, we note that the University confirm that the efficiency of the telescope at JBO is already significantly impaired. Interestingly, these impairments themselves will have led to an improved understanding and application of data collation and analysis techniques now used to remove and/or distinguish existing background radio noise from the data attained from the telescope. Again, we think this context is important and should be included within the SPD.

20. Overall, we think that it is only right that the local communities affected by the wide-reaching consultation zone are provided with a fair and open contextual understanding of how the JBO site currently operates and how it is expected to operate and function on a global scale going forward.

The Consultation Zone (Background Context)

21. In terms of other contextual points, Section 3 'Legal Framework' references the Jodrell Bank Radio Telescope Direction 1973. Further reference to this document is made in Section 6 and a version of it is included at Appendix 3 of the document. In order to fully understand Section 6 of the SPD and the application of suggested policy approached, it is imperative that the SPD includes an accurate and up to date plan of the Consultation Zones that are set by the 1973 direction, which include an inner and outer zone. Given the 1973 Direction map is on an old OS base and these different zones are not identified on the adopted Local Plan proposals map, the accurate and up to date map should be within Appendix 3 of the SPD and this should be clearly referenced in Section 3 and 6 of the SPD so it is clear and transparent to all residents, businesses and landowners as to where these zones lie (see example Plan at **Appendix 1** of our representations).

22. Paragraph 6.3 of the SPD highlights the fact that the consultation zone is predominantly agricultural but incudes the settlements of Goostry, Holmes Chapel and several smaller hamlets and individual homes. It should be made clear that parts of Congleton and Middlewich also fall within the Consultation Zone. The scale of existing development within the consultation zone should also be made transparent within the SPD. This is deemed important is it will influence the baseline understanding of how efficiently the JBO currently operates. Based on GIS data we have acquired, there is approximately 6,000 homes in the inner zone and 3,500 in the outer zone (albeit the latter is likely to increase significantly in the next few years due to the extension to Congleton to the north of the settlement. Indeed, we would expect the total residential homes within the consultation zone to exceed 10,000 homes in due course. It would be helpful if this was explicitly set out in the SPD so all applicants, the community and decision makers understand the baseline position for all planning applications.

Measuring the Impact on the Efficient Operation of the Telescopes and Applying a Balanced Planning Judgement

23. We do have some concerns that determining the impact on the efficient operation of the telescopes (which are owned and operated by the University of Manchester), is based on a methodology and impact thresholds devised and set by the University. Moreover, the

University will be the statutory consultee assessing any independent appraisals submitted as part of any planning application and will then advise the Council as to whether the development will have an unacceptable impact on their asset. Whilst the consultation process on applications is clearly embodied in the 1973 Direction, it has to be acknowledged there is a real danger of self-protecting interests being infused within the SPD methodology. We do not say this to cause offence or question the integrity of the University in anyway. However, we feel that it is important that the Council seek and take serious account of evidence prepared by any impartial respondents to the SPD and we would urge the Council to seek independent advice on the SPD before it is formally adopted (e.g. through an independent UKAS review).

24. With regard to our assessment of the methodology, the initial inputs to Stage 1 and approach appear to be appropriate (i.e. those elements relating to the single appliance emission, aggregate emission, and path loss). Where we have real concern is the introduction of an assessment against the International Telecommunication Union thresholds under the fourth bullet point of Stage 1. Whilst we note that the Secretary of State has made reference to the ITU thresholds in the Gladman appeal, we consider that they need fuller scrutiny within a formal development plan setting rather than an SPD because the consequences of applying them in Cheshire East are very stark when considering the overall requirements for sustainable development and the implications for certain key settlements and the Borough as a whole. Moreover, we consider they are taken and grossly out of context by the University.

25. The ITU thresholds are not new. What is new is the context in which the University are now seeking to apply the ITU threshold. Our understanding is that the ITU thresholds were initially drafted in 1995 and were last amended in 2003. However, it is only relatively recently that the University of Manchester has sought to apply them to their consideration of development despite the Direction and consultation zone being in place throughout this period. We question why these thresholds were not raised by the University previously.

26. Critically, there is no reference to the ITU thresholds within the adopted development plan and whilst it is noted that the Council would provide additional key evidence on Jodrell Bank in due course, the Local Plan makes it clear that this was 'under preparation'.

27. Having reviewed the examination papers and Hearing Statements to the Part 1 Local Plan (Matter 11), it is clear that no evidence on this matter was made available at the critical consultation periods of the Part 1 Local Plan (examination sessions around August/September 2014). It is also evident from the Local Plan examination papers that the University did not seek to address Policy SE14 at the examination and provided no hearing statement of their own. The Council's hearing statements also made no reference to how detailed assessments relating to the measurement of impact on the efficiency on Jodrell Bank would be carried out and there was certainly no reference to the use of the ITU thresholds.

28. Instead, there is evidence from a planning application for 100 new homes in Holmes Chapel in 2014 on an unallocated, greenfield site located within the inner consultation zone

where the University. Again, the University chose to make no mention of the ITU thresholds and simply recommended the mitigation measures towards that scheme (see attached letter dated 18th March 2014 at **Appendix 2**). It is therefore entirely fair to say that the Council, local communities, landowners and developers would have reasonably felt that suitable mitigation could be put in place and the JBO Consultation Zone and 1973 Direction would not fetter what would otherwise be regarded as perfectly sustainable development (even in conjunction with the emerging and advanced Policy SE14).

29. The approach now being put forward by the University and the Council, through this SPD is that the ITU thresholds set an unacceptable impact as being 10% above any thermal noise created by the radio astronomy equipment itself, combined with background interference in the atmosphere. Whilst the ITU guidance can be applied more widely, our understanding is that the ITU guidance is principally geared towards the delivery of new telescopes and in locations where there is limited existing noise and how one might determine what is a material impact when designing the new facilities.

30. Applying the ITU thresholds in Cheshire East becomes incomprehensible on the basis that one additional appliance located within 3km of the JBO would breach the 10% ITU threshold. Scaling that up to one house, extends a 10% impact area well beyond the Consultation Zone and would include the entire settlements of Middlewich and Congleton and others. Adding one additional home to many tens of thousands cannot be regarded as representing a material impact on any level and there is clearly development planned within those settlements that will shift the existing baseline further.

31. This simply indicates that the application of such a low threshold/measurement becomes entirely impractical and meaningless when considered in an area where there are already 10,000 homes within the Consultation Zone and where the SPD already acknowledges that this threshold is breached by many thousands of times already.

32. Upon first reading the SPD, we felt that Stage 2 of the assessment articulated at paragraphs 6.24 to 6.26 might provide some level of balance in that the existing baseline position would be used to then determine to what extent any development would have an impact when considered against the baseline position of existing homes and settlements being located within the consultation zone already. In particular 6.26 states:

> *'This analysis demonstrates that the baseline level of interference is already high across the JBOZ. Applying this to analysis of a single development proposals means focusing on the relevant pathway between the proposal and the JBO, to establish the background level of interference on this particular pathway and determine the extent to which the additional interference caused will be individually or cumulatively harmful.'*

33. However, the section does not go on to state what level of individual or cumulative impact over and above the baseline positions will be regarded as being so onerous that it would make a meaningful difference to the current and future operational limitations of the JBO. Indeed, understanding the proportional impact of development when tested

against the existing baseline position is an important consideration in order to determine what the actual scale of the impact will be.

34. To understand how the University will assess any proposals, it is clear from the information at Appendix 7 and the conclusions reached at paragraphs 13.57 to 13.66 that any development that exceeds the ITU 10% threshold will be deemed unacceptable irrespective of the existing baseline position, which is used by the University to further justify no further development. Indeed, at paragraph 13.66, the following is stated:

> *'Both these analyses show that in the direction of the proposed development the existing residential development is likely to produce interference which already exceeds the ITU threshold by a large factor (>1000). The University of Manchester does not dispute this – it is why observations at JBO are already significantly challenged. The University also accepts that the fractional increase in interference due to this individual proposed development will also be relatively small (because of the large existing level). However, the fact remains that the proposed development will contribute a significant amount of interference, exceeding the accepted ITU definition of harmful interference to radio astronomy. It is also important to place it in its proper context, which is that it is a further degradation relative to existing levels of interference which are already impairing the efficiency of the telescope and affecting the work carried out at Jodrell Bank. Allowing this scheme would create an ever-worsening baseline of interference against which it would be difficult to control future development which also breached the international threshold.'*

35. Instead of applying the 10% ITU threshold, we would recommend that the Stage 1 assessment is carried out to determine the individual radio interference of a development proposal and that output is then solely examined against the proposed Stage 2 part of the assessment where the existing baseline interference is measured. A proportional measurement can then be taken to consider the extent to which proposed development would increase the baseline position as a percentage. The decision maker would at least then have a meaningful percentage figure in terms of how much additional interference would take place and then determine if that level of impact would override other benefits associated with the development proposal.

36. In short, our position is that the application of the ITU thresholds in Cheshire East does not allow for a meaningful impact assessment to be carried out in order to determine what would represent a material harm. Furthermore, a rigid application of the ITU thresholds has such a wide reaching impact on other aspects of sustainable development, they can only really be fully tested and examined through a formal development plan process and should therefore not be relied upon as part of this SPD.

Mitigation Measures

37. We do particularly welcome paragraphs 6.118 to 6.132 if the SPD which relate to mitigation and development control measures that can be put in place to mitigate the

impact of development on the efficiency of the JBO. We welcome the helpful introduction into the types of materials and finishes that that would and wouldn't be appropriate.

38. It would be extremely helpful if this information could be extended (particularly for smaller SME developers). For instance, if examples and/or versions of construction plans accepted by the Council elsewhere on other sites could be included as an appendix to the SPD this would greatly assist in ensuring complete and thorough planning applications are submitted to the Council to help save time for all involved.

39. As well as the example condition relating to the removal of permitted development rights from new developments, it would also be helpful if the Council could include conditions that would be appropriate to apply to a full and Reserved Matters planning application and outline planning applications for housing within the JBO Consultation Zone that relate to the sign of specific screening materials and design parameters.

40. If developments include appropriate mitigation measures, the SPD should make it clear that this will be given significant weight by the Local Planning Authority in ensuring sustainable development is able to take place.

Monitoring and Review Process

41. Given the suggested impact of development on the efficiency of the JBO, we feel that it would be prudent if the Council monitored the amount of development permitted within the Consultation Zone through formal planning applications and prior approval applications.

42. If the Council do not propose to alter/review the methodology set out with the SPD and particularly the ITU thresholds being application, we consider that it will be important to monitor the University's responses to applications in terms of objections and support to determine if an objective and impartial approach is being taken. If all development proposals for new housing trigger an objection, this would indicate that the threshold set within the methodology is impractical and ineffective in determining what constitutes a genuine material impact on the efficiency of the telescope.

43. We also consider the Council will need to make representations to Government to alter the Consultation Zone (1973 Direction) once committed developments around north Congleton on the basis that the urban edge of the settlement will have significantly altered (noting the existing zone ran around the former settlement boundary of the town).

44. We would also suggest that the Council make it clear that the SPD will be fully reviewed as part of any emerging Local Plan process and also following the completion and operation of the Square Kilometre Array given this will significantly alter the role of JBO going forward.

Summary / Weight to be Afforded to the SPD

45. Ultimately, we consider this consultation to be premature given the anticipated changes to Policy HER9 in the Site Allocations Development Plan Document and the fact that DPD has yet to be adopted. However, further to discussions with the Council we understand that another consultation period is likely in the future and there is a possibility of workshops taking place to discuss the matter in more detail, which we would welcome.

46. As it stands, we consider the SPD is ineffective and applies a benchmark threshold to development within the consultation zone that is unachievable if the University's methodology and approach is to be applied. Any level of impact on the efficiency of the telescope is highly likely to be deemed unacceptable from the perspective of the University of Manchester even though the additional impact on the effective operation of the telescope is likely to negligible in the face of existing sources of radio noise.

47. Whilst we can agree to a large proportion of the scientific inputs into the methodology, the yardstick being used to determine impact is not considered to be robust or proportionate (irrespective of the findings of the Gladman appeal). The fact that the University is the author of much of the SPD and the methodology being put forward and will also be the adjudicator (and statutory consultee in most instances), we do not consider the overall approach set within the SPD is impartial and we would welcome the Council undertaking an independent review.

48. The impact of the SPD and the approach being taken will ultimately result in significant consequences on existing communities within the consultation zone and impede what would otherwise be perfectly sustainable development. Critically, such consequences have not been thoroughly tested through an SA process either as part of the Local Plan or this SPD. This is because the suggested methodology was not tested during the Part 1 or Part 2 Local Plan and the SA work carried out by the Council in relation to the SPD does not fully appreciate the consequences and outcome of the methodology being proposed. Moreover, the SPD process is not one that is tested through an independent examination.

49. With the above in mind, we would be unable to afford any weight to the SPD's methodology as things stand. However, we do welcome the mitigation techniques set out within the SPD and note that the University has previously advocated such techniques in the context of planning applications for new homes in the consultation zone in the recent past and at a point when Policy SE14 was being consulted upon. Critically, the SPD should also make it clear that and significant weight will be afforded to the inclusion of mitigation measures within sustainable development proposals with the JBO consultation area.

51. Finally, once adopted the content of the SPD and Consultation Zone should also undergo a full review at least every 5 years, as part of any full Local Plan Review and also at the point that the Square Kilometre Array infrastructure is complete and begins to transmit data to JBO. This review period should be articulated in the SPD.