

260824 – CEC Local Plan Scoping Consultation

Response submitted by:

To be submitted using the on-line facility and also by email to localplan@cheshireeast.gov.uk

Section 1.7

The following statement is noted:

'We are not inviting the submission of sites as part of this scoping consultation. There will be further opportunities to submit sites for consideration for allocation to meet development needs as the plan progresses.'

So, this Local Plan Consultation does not provide any opportunity to comment on the sites which have been included in the most recently published 'Submission' document. This appears to be a significant omission at this stage. However it is noted that there will be an opportunity to comment on those sites which have been included in the 'long list' as part of a subsequent stage in the Consultation process. [See also Sections 2.6, 5.8 & 5.10.]

It is acknowledged that 'submitted sites' have no planning status and that publication is 'for transparency'. It is also noted that the 'long list' of sites will be subject to an assessment, although the basis of this evaluation is, as yet, unclear.

2.1

A statement is included to the effect that 'the emerging Local Plan (will) sit alongside 'National Planning Policy Framework' (NPPF) and 'Neighbourhood Plans'. This is all well and good, however:

- The NPPF (and associated documents) has / have only just been the subject of a wholesale and wide-ranging revision on 17 August 2026. Given that the Local Plan Consultation is set to close just 2wks later (31 August) it is considered that there is inadequate time / opportunity to fully appreciate the implications of the revised NPPF. (The statements included under Section 2.3 are noted.)
- Neighbourhood Plans simply cannot be revised in a meaningful way unless and until the emerging Local Plan has been fully developed and made available for scrutiny.

2.5

The following statement is noted:

'The government has introduced a standardised way of calculating local housing needs which is known as the "standard method". This approach has increased the housing requirement in the borough to 2,530 homes per year.'

This raises the following two fundamental questions:

- Once finalized and actually in force, how will the Local Plan be amended as required to reflect dynamic changes in the requirement for housing? In other words, how will the adopted Local Plan be amended to reflect adjusted Housing Delivery Tests and, more importantly, the 5yr Housing Land Supply statistics?

Similarly, how will the adopted Local Plan be amended to cater for changes in Govt National Housing policy?

[See also Section 3.3 *et seq.*]

5.4

The following statement is noted:

“As part of this scoping consultation, we would be grateful for your views on priority matters for inclusion in the vision, aims and objectives, and measurable outcomes for the new local plan.....”

It is considered that these priority matters should include:

Retention of the rural character of key areas such as the “....*sparsely populated and, in some cases, relatively isolated settlements to the south west of Nantwich.*” (Section 4.19)

This objective is essential in order to safeguard the identity of such areas, to protect the natural environment and historic features and also to avoid an unwanted homogeneous approach to development. In other words, required housing needs should be met by development in other, more established areas of Cheshire East and not in rural backwaters.

This approach makes sense since, by definition, the more established towns have better access to essential infrastructure, facilities and transport links. Villages, hamlets and scattered groups of houses outside predominantly built-up areas should not be treated as settlements unless the development plan specifically defines them as such.

5.10 / 5.11

The following statements are noted:

“Sites submitted through the 2024 and 2026 call for sites exercises.... will be assessed to determine their suitability, availability and deliverability.”

“The methodology will include our approach to filtering sites that are obviously unsuitable for development..... The output of this work will be a list of sites that will be considered further as potential draft allocations. Additional opportunities to submit sites or update existing submissions will be available as the local plan progresses.”

The next stage in the selection of possible sites for housing development is of crucial importance. Unsuitable sites should be ‘screened out’ right at the outset to remove them from the ‘long list’. As such, we await the forthcoming ‘plan content and evidence’ consultation’ with keen interest.

5.20 / 5.21 / 5.22 / 5.23 / 5.26

The limitations of some of the ‘Local Service Centres’ (as listed) should be recognized. In reality, some of these smaller Local Service Centres have very limited facilities (e.g. transport infrastructure, access to rail and bus services, connectivity to road networks which cannot cope with any significant additional housing numbers and also inadequacy in terms of access to shops, schools and other vital facilities such as medical centres. Even a cursory examination of many / most of the Local Service Centres as listed will highlight their unsuitability for further development. The assembly of such evidence is an essential part of the compilation and refinement of a workable ‘settlement hierarchy’.

The suitability or otherwise of areas / sites which fall outside the settlement areas / Local Service Centres should be even more apparent. (See also Section 5.91 *et seq.*)

5.29

The following statement is noted:

“National decision-making policies will.... set out the overall approach to development outside of settlements.”

The August 2026 revision of the National Planning Policy Framework now includes a better definition of settlements and how boundaries should be set. The ‘presumption in favour of sustainable development’ now applies via Policies S3 – S6.

In particular, Policy S5 identifies, in principle, what sort of development is acceptable in areas outside of settlements. The tests for development in such areas are clear and well-defined. It should be noted that the benefits must substantially outweigh the adverse effects, including effects on countryside character. By way of example, a small hamlet or cluster of houses outside predominantly built-up areas has no defined settlement status (unless so defined in the development plan).

5.31

Once available, the ‘Housing Needs Assessment’ must be the subject of careful scrutiny as it will have an influence on the selection of sites. Presumably this will form part of a subsequent stage of the Local Plan Consultation.

5.47 / 5.48 / 5.49

It is noted that (current) Government housing policy sets a quota for the allocation of housing development to ‘small sites’ (<1Ha) and ‘medium sites’ (>1ha <2.5Ha). The policy states that 10% of the housing requirement should be allocated to each of these categories.

This policy is not only rather crude but it also takes no account of other factors and constraints which are of vital importance in the selection of suitable sites for housing. It cannot be equitable or reasonable that such a policy should ‘trump’ these other fundamental considerations. There is a need to ‘screen out’ unsuitable sites, irrespective of the size of the plot. To put it another way, the requirement to meet the quotas for small and medium sites may not be compatible with other valid criteria which should really be dominant as a pointer to the selection of sites which may be suitable for housing development. This is considered to be a key point.

ENDS