

27th August 2026
Letter 1/2

Dear Cheshire East Council planning team,

Please find Cheshire Wildlife Trust's response to the scoping consultation on your new local plan.

We hope this plan is designed to create a thriving natural East Cheshire and protect and enhance the natural environment for generations to come.

I have sectioned our respond to the corresponding paragraphs in your consultation.

2.1 The local plan sets a long-term vision and strategic priorities to shape the development of the borough...

In the subsequent list given in this paragraph, we suggest you add *the protection and enhancement of the natural environment* to the list of what the local plan can address for future consultations. This is in line with the NPPF (2026) paragraph 17. -c. which states that a local plan has – an environmental objective – to support efforts to mitigate and adapt to climate change, including moving to a low carbon economy; and to protect and enhance our natural, built and historic environment, including making effective use of land, improving biodiversity, using natural resources prudently, and minimising waste and pollution.

2.4 An up-to-date new local plan will provide significant benefits to the whole area by:

In the subsequent list given in this paragraph, we would suggest adding for future consultations- *Protecting and enhancing the natural environment of Cheshire East for current and future generations*. This reflects the commitment of Cheshire East to provide good quality green and blue spaces which have multiple benefits to the communities of east Cheshire. As is consistent with the goals within the environmental improvement plan which are:

1. [Chapter 1: Restored nature](#)
2. [Chapter 2: Environmental quality](#)
3. [Chapter 3: Circular economy](#)
4. [Chapter 4: Environmental security](#)
5. [Chapter 5: Access to nature](#)

Planning for growth – chapters 5.5 - 5.7

Planning for growth should also include provision for environmental growth. This is intrinsically linked to the economy, health and climate resilience. Provisions like the Local Nature Recovery Strategy (LNRS) measures should be thoroughly considered into a plan for growth.





Supporting evidence:

[Final Report - The Economics of Biodiversity: The Dasgupta Review - GOV.UK](#)

[Nature and Human Health: Exploring the Vital Connection for Wellbeing | Springer Nature Link](#)

Housing and employment sites – chapters 5.10 – 5.18

Sites should not be considered for development that:

- A) Have any existing environmental designation on them including Local Wildlife Sites
- B) Have LNRS opportunities for environmental enhancement
- C) Have evidence of priority habitats and species on the site

Although greenbelt's primary objective is to reduce the impact of urban sprawl, it also offers the opportunity for the enrichment of nature. As the UK is one of the most nature depleted countries in the world and biodiversity is still in decline ([State of Nature 2023 - report on the UK's current biodiversity](#)), greenbelt is sometimes all there is left to bring nature back. Once these sites are gone, they are gone for good to it is vital to consider these sites in the context of the nature and climate crisis.

Furthermore, sites that have priority habitats and environmental designations are far more likely to have public opposition to development proposals as they are very much linked to community wellbeing.

Any site that presents environmental benefits and is subsequently developed, should follow BNG best practice principles ([Biodiversity Net Gain: Good Practice Principles for Development, A Practical Guide. | CIEEM](#)), most importantly – Do everything possible to first avoid and then minimise impacts on biodiversity. By initially removing any potential development sites that have an environmental benefit from the local plan, it will not only be likely to reduce public scrutiny of a site, but it will also likely reduce the cost of BNG.

We strongly recommend that a policy for your new local plan includes the provision that developers must follow BNG good practice principles as this will help ensure responsible development in Cheshire East that will benefit the area for generations to come.

Strategic green gap – paragraph 5.19

Strategic green gaps seem like a redundant policy to have when greenbelt exists and is defined in national policy. If the aim of a strategic green gap is to maintain settlement identity and prevent coalescence of villages, this should be made green belt, or better yet, land for environmental recovery. This would allow settlements to maintain their identity and enhance the wildlife and habitats connectivity corridors identified in the LNRS.

When assessing these areas and within the green belt assessment, it should also consider the wildlife corridors, designated sites and habitat connectivity corridors identified in the LNRS. Species connectivity is essential for the environmental wellbeing of Cheshire East and in creating resilient populations and species. As per the NPPF (2026) paragraph GB3 – 1 - Green Belt boundaries should only be altered through the preparation and updating of local plans and where exceptional circumstances are fully evidenced and justified.

And

GB5: Beneficial uses of Green Belt land

1. Green Belt land should provide benefits for communities and nature, which means that the development plan should, at the most appropriate level, set out:

a. Opportunities to improve the environmental quality, secure improved public access to





greenspace, including for outdoor sport or recreation, allotments and community food production, within the Green Belt;

b. How the Green Belt can contribute to the priorities for nature recovery set out within relevant Local Nature Recovery Strategies; and

c. Opportunities to support the objectives of the National Forest, England's Community Forests

Furthermore, there should be a commitment in the new local plan to prioritise development on brownfield sites before greenbelt.

Natural environment – paragraph 5.96 – 5. 103

As a local authority, CEC must also comply with the biodiversity duty [Complying with the biodiversity duty - GOV.UK](#). As part of this, the LNRS has:

- agreed priorities for nature's recovery
- mapped the most valuable existing areas for nature
- mapped specific proposals for creating or improving habitat for nature and wider environmental goals

The LNRS identifies wildlife corridors, habitat connectivity and regionally scarce opportunities to enhance the natural environment. The LNRS proposals should be written into policies within the local plan and be a fundamental part of the call for sites evaluation of sites for development, natural environment and open land.

Internationally, the UK has set its commitments to the UN COP15 biodiversity framework and published the [UK national biodiversity strategy and action plan - GOV.UK](#). This commits the UK to achieving all 23 of the Global Biodiversity Framework targets at home including:

- Expand protected areas to at least 30% of the land and seas
- Reduce pollution from all sources to levels that are not harmful to biodiversity
- Enhance biodiversity and sustainability in agriculture, aquaculture, fisheries, and forestry

This should be reflected in the CEC new local plan to reflect the commitments at a national level.

The following planning practice guidance should also be considered when assessing the natural environment:

[Natural environment - GOV.UK](#)

[Light pollution - GOV.UK](#)

[Open space, sports and recreation facilities, public rights of way and local green space - GOV.UK](#)

[Green Belt - GOV.UK](#)

[Climate change - GOV.UK](#)

[Biodiversity net gain - GOV.UK](#)

[Air quality - GOV.UK](#)

Health and wellbeing – paragraphs 5.104 – 5.108

It has been continually proven that access to nature is essential for the wellbeing of individuals and communities. Access to good quality nature spaces should be considered



with health-related policies.

This is also reflected in the EIP's commitment to access to nature for all.

[Healthy Outdoors: Strengthening the Evidence for Nature Based Health Interventions – Natural England](#)

Pollution and contamination – paragraphs 5.109

Pollution should also be considered in relation to harm to the natural environment. Including pollution impact to species (particularly protected species), designated sites and areas for environmental protection and enhancement.

Recreation and community facilities – paragraph 5.118

Parks and publicly accessible natural spaces such as woodlands, wetlands and peatlands are also crucial community natural infrastructure that should also be considered when providing provision for wellbeing, social cohesion and cultural life.

This would also reflect Commitment 86 in the Environmental Improvement plan ([Environmental Improvement Plan \(EIP\) 2025 - GOV.UK](#)) which is: Make sure that everyone has access to green or blue spaces within a 15-minute walk from home.

Design – paragraphs 5.131 – 5.138

It is vital that the LNRS becomes a crucial part of designing the next Cheshire East Local Plan and its recommendations written into policy.

This is in line with NPPF (2026) policy N1:

Development plans should safeguard and enhance the natural environment, and reflect the wider benefits from natural capital and ecosystem services, by using **Local Nature Recovery Strategies**, Protected Landscape Management Plans, River Basin Management Plans, National Forest Strategies, Community Forest Plans and other relevant evidence

Whilst there is a large housing provision in Cheshire East, the LNRS details the urgent need for enhancement and protection of the environment for current and future generations. There are county-wide recommendations that should feature in the design of the Cheshire East Local Plan and specifically, LNRS opportunities that provide a rare opportunity to enhance limited habitats or species should be considered when designing the new local plan.

The evidence base behind the LNRS is robust and compliant with the EIP and as such should be put into policy as part of the plan design.

As the UK is one of the most nature depleted countries in the world, it is vital you do not miss the opportunity to protect and enhance Cheshire's natural spaces before they are all gone.

Local plan evidence base

CEC should contact Cheshire Wildlife Trust to obtain Local Wildlife Site Data to ensure the most up to date data is used to determine the outcomes of the call for sites analysis.

New evidence – paragraph 5.145

Within the viability assessment, BNG must be accounted for. We strongly recommend BNG best practice principles ([Biodiversity Net Gain: Good Practice Principles for Development, A Practical Guide. | CIEEM](#)), are followed for this assessment. This assessment should ensure accounting for proportional and good quality mitigation and compensation through



BNG in relation to any potential sites put forward.

Proposed local plan engagement strategy

Further consultations should not solely happen in the school holidays. This limits people's ability to respond and puts pressure on organisations to work around holidays. As you have said, you are committed 'to help ensure that engagement is accessible to a wide range of people'. It would seem appropriate to ensure those that take leave in summer for childcare reasons are not excluded from participating in the consultation.

Furthermore, a specific consultation on the call for sites should happen before the next general consultation in Summer 2027. This is likely to be one of the most contentious areas of the area and it would reflect your commitment to being transparent by allowing groups and individuals to respond to the call for sites exercise. It would also create an open dialogue between the council and whom they represent, which would be positive.

It is vital this new local plan creates a nature thriving Cheshire East and we hope you will take our advisements under serious consideration. A further letter will follow that will directly address the call for sites exercise.

If you would like to contact me about anything raised in this consultation response, please do not hesitate to do so.

Kind regards,

Faye Kelland
Advocacy Programme Manager

