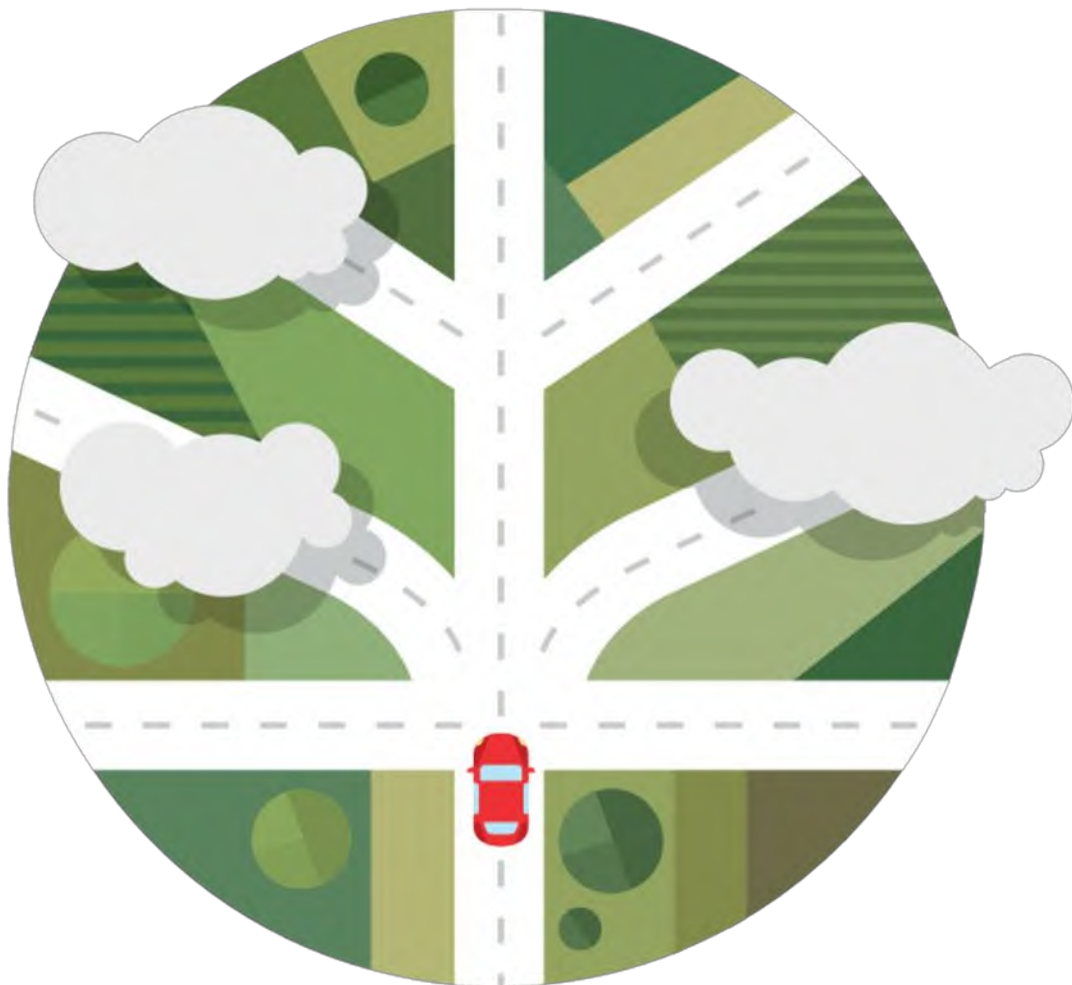




Church Commissioners for England

Representation to the Cheshire East Council Local Plan Scoping Consultation

September 2026

Contents

1.	Introduction	2
2.	Increase in Housing Requirements	4
3.	Spatial Development Strategy	8
4.	National Decision Making Policies	9
5.	The Vision and Objectives	10
6.	Planning for Growth	11
7.	Housing	15
8.	Transport and Infrastructure	17
9.	Natural Environment	19
10.	Health and Wellbeing	21
11.	Design	22
12.	Summary	23

Appendices

Appendix 1 - Strategic sites in Wybunbury submitted to
Call for Sites: Land North of Main Road, Land South of
Church Way, Land West of Bridge Street

Appendix 2 – Land North of Stock Lane, Shavington Vision
Document

1. Introduction

Background and Context

- 1.1. Deloitte LLP is instructed by the Church Commissioners for England (“the Commissioners”) to submit representations to the Cheshire East Council Local Plan Scoping Consultation (“the Consultation”). The Consultation represents the first formal stage in the preparation of the new Cheshire East Local Plan under the revised plan making system. It seeks views on the scope evidence base, objectives and strategic direction of the new Local Plan.
- 1.2. The Commissioners are a registered charity, established in 1948 to manage the Church of England’s historic assets, and is responsible for providing financial support for the work and mission of the Church of England across the country. This is achieved through the responsible and ethical management of the Church’s permanent endowment fund, a diverse investment portfolio which enables the Commissioners to provide financial support for the Church, by helping to ensure funding is intentionally used for its mission and growth. The Church’s historic land holding is held by the Commissioners as part of this investment portfolio and equates to c. 80,000 acres of land across England, a proportion of which already has significant identified development potential. This landholding is national, from Cornwall to Cumbria, Tyneside to Kent, and across the heart of the country. The Commissioners is responsible for managing a diverse property portfolio, including strategic land, rural and commercial assets.
- 1.3. The Commissioners support the preparation of a positively prepared, aspirational and deliverable Local Plan that meets identified housing and employment needs, supports sustainable economic growth, and directs development to locations that are, or can be made, sustainable through appropriate infrastructure provision and investment.
- 1.4. The Commissioners have existing land interests within Cheshire East. These interests were promoted through the previous plan making process, including the Cheshire East Local Plan Issues Paper Consultation and associated Call for Sites exercise in 2024. The red line plans, and associated vision documents, submitted to the Issues Paper Consultation in 2024 are contained within Appendix 1 and 2 of this representation. The previous representations identified the following sites, as land interests capable of contributing towards Cheshire East’s future housing needs:
 - Land to the north of the Main Road, Wybunbury;
 - Two sites at land to the south of Church Way (west and east), Wybunbury;
 - Land to the west of Bridge Street, Wybunbury; and
 - Land North of Stock Lane, Shavington.

Structure of Representations

- 1.5. These representations respond to the targeted sections of the Consultation which are most relevant to the Commissioners’ land interests and the emerging spatial strategy, including housing need, the Spatial Development Strategy, National Decision Making Policies, the vision and objectives, identifying and assessing sites, strategic gap,

settlement hierarchy, spatial distribution, housing, transport and infrastructure, the natural environment and design.

2. Increase in Housing Requirements

- 2.1. The Commissioners welcome the Council's recognition that housing need has increased significantly following the December 2024 revisions to the standard method. This represents a fundamental change in the planning context within which the new Cheshire East Local Plan is being prepared.
- 2.2. The Consultation confirms that the adopted Local Plan Strategy ("LPS") identified a need for 36,000 new homes between 2010 and 2030, equivalent to an average of 1,800 homes per year. It also confirms that the standard method figure for Cheshire East was 977 homes per year before December 2024. The revised standard method now identifies a housing need of 2,530 homes per year, representing a 41% increase compared to the current Local Plan requirement and a 159% increase compared to the earlier standard method figure.
- 2.3. The scale of this change is significant. The previous Local Plan Strategy planned for 36,000 homes over a 20 year period. By contrast, the revised standard method figure equates to 37,950 homes over a 15 year plan period, before any uplift to reflect economic growth, unmet need from neighbouring areas or infrastructure investment. The Council's own scoping material recognises this figure when considering the implications of small and medium sized site requirements.
- 2.4. The Council's Authority Monitoring Report ("AMR") 2024/25 confirms that 27,423 net dwellings were completed between 1 April 2010 and 31 March 2025, leaving 8,577 net dwellings to be delivered over the remainder of the current plan period. It also confirms that the net number of housing completions has exceeded the local plan target each year for the last eight years and that, at 31 March 2025, average completions over the first 15 years of the plan period had been achieved, with a surplus of 423 dwellings overall. This demonstrates that Cheshire East has delivered well against the adopted 1,800 dwellings per annum requirement, and underscores the benefits of strategic allocations and planned development.
- 2.5. The most recent monitoring evidence identifies a clear shortfall in five year housing land supply when assessed against the latest annual housing need figure. The AMR records that the Housing Monitoring Update, with a base date of 31 March 2025, identifies a five year housing land supply requirement of 13,162 dwellings, based on an annual housing need figure of 2,632 dwellings including a 5% buffer. Against this requirement, the Council identifies a deliverable five year housing land supply of 8,780 dwellings, equivalent to 3.3 years
- 2.6. The Commissioners have also had regard to the 2025 Housing Delivery Test measurement, published 17 August 2026. This records that Cheshire East delivered 6,508 homes against a total requirement of 3,061 homes over the three year measurement period, resulting in a Housing Delivery Test score of 213% and no consequence. This is a positive indicator of recent delivery against the lower historic requirement, as the latest Housing Delivery Test used the previous standard method (16 December 2020) for calculating housing need. As such, the positive Housing Delivery

Test result does not obscure the fact that the Council's current deliverable supply falls materially short when assessed against the revised standard method housing need figure. The issue is therefore not simply past delivery performance, but whether the new Local Plan identifies enough deliverable and developable land to meet a much higher future requirement.

- 2.7. The National Planning Policy Framework, August 2026 ("NPPF") reinforces this approach. Policy HO1 requires plan preparation to be based upon "*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 in Annex D*". It states that, where a Spatial Development Strategy is not in place, local plans should establish the housing requirement figure for their area, taking account of any relevant emerging Spatial Development Strategy. Policy HO2 further confirms that housing requirement figures should be higher than the overall figure identified in the local housing needs assessment where appropriate, including where a higher requirement is necessary to meet the needs of neighbouring areas or to reflect growth ambitions linked to economic development or infrastructure investment.
- 2.8. The Commissioners therefore consider that the new Local Plan should identify a housing requirement that meets the revised standard method figure, as a minimum. The Council should also test whether a higher requirement is justified having regard to economic growth, infrastructure investment, affordable housing need and the emerging Cheshire and Warrington Spatial Development Strategy. This is particularly important given Cheshire East's economic role, the strategic importance of the Crewe and Nantwich area, and the potential for the emerging Spatial Development Strategy (SDS) to identify wider sub regional growth priorities.
- 2.9. Policy HO3 requires local plans to identify a sufficient supply and mix of sites to meet or exceed the housing requirement figure over the plan period. This includes a supply of specific deliverable sites for the first five years following adoption, with an appropriate buffer, and a supply of specific developable sites or broad locations for growth for the subsequent years. This policy should be central to the Council's approach. The current 3.3 year supply position demonstrates that the new Local Plan must identify a broader and more resilient portfolio of sites than is currently available.
- 2.10. The Commissioners consider that the new Local Plan should avoid over reliance on any single source of supply. The Council's AMR shows that, between 2010 and 2025, 7,971 net dwellings were completed in the Principal Towns, 13,679 in Key Service Centres, 2,881 in Local Service Centres and 2,892 in villages and rural areas. This distribution reflects the current strategy, but the significantly increased housing requirement means that the new Local Plan will need to re-consider the distribution of growth to meet elevated housing requirements.
- 2.11. Consideration should be given to the relatively limited proportion of completions in Local Service Centres and villages / rural areas in light of the revised NPPF. Policy HO6 requires local plans to allocate land to accommodate at least 10% of the housing requirement on sites no larger than one hectare, and a further 10% on sites between one and 2.5 hectares, unless there are strong reasons why these targets cannot be achieved. It also requires local plans to allocate sites which will "*support and enhance the vitality of rural communities and enable villages to grow and thrive, especially where this will support local services*".
- 2.12. The Commissioners' land interests at Wybunbury provide opportunities for smaller, proportionate village edge growth capable of contributing to a diversified housing supply,

supporting rural vitality and providing homes in locations that are functionally related to Wybunbury, Shavington, Nantwich and Crewe. These sites can help deliver small and medium sized supply, support rural services, contribute to affordable housing provision and provide earlier delivery within the plan period.

- 2.13. The AMR also confirms the importance of rural housing delivery. It records that there were no completions of affordable homes on rural exception sites in 2024/25, for a consecutive year. This indicates that reliance on rural exception delivery alone is unlikely to meet affordable housing needs in rural areas. The Local Plan should therefore identify positive policy mechanisms and site allocations for market-led housing which enable appropriate rural and village edge growth to contribute to affordable housing delivery and the vitality of rural communities.
- 2.14. In addition, Shavington is already identified as a Local Service Centre in the existing settlement hierarchy. Land North of Stock Lane is a larger, settlement edge opportunity associated with that Local Service Centre. The site is capable of being planned as a modest sustainable urban extension, contributing towards a larger scale of housing delivery while also delivering affordable housing, open space, biodiversity net gain, SuDS, landscape infrastructure and active travel connections.
- 2.15. This aligns with Policy HO4 of the NPPF, which supports the identification of strategic sites for housing-led development, including significant extensions to existing settlements, where they are capable of being supported by necessary infrastructure and facilities, capable of supporting a sustainable community, and able to address strategic environmental opportunities and safeguards, including those set out in Local Nature Recovery Strategies. Land North of Stock Lane, Shavington should therefore be assessed through the Local Plan as a potential planned extension to an existing Local Service Centre.
- 2.16. The Shavington site also aligns with Policy HO13, which emphasises that land with permission should be developed without unnecessary delay and that proposals for major development involving housing should be capable of bringing housing forward within a reasonable period, taking into account tenure mix, local market conditions and the development history of the site. A planned allocation at Shavington would allow the Council to manage delivery, infrastructure requirements, design quality and phasing through the Plan led system.
- 2.17. The Commissioners also note the AMR's affordable housing data. In 2024/25, 29.7% of total dwellings built across the Borough were affordable, with the five-year average proportion being 23.9%. This demonstrates the importance of maintaining overall housing delivery if affordable housing delivery is to be sustained and improved. The new Local Plan should therefore identify sufficient viable and deliverable sites capable of supporting affordable housing provision across a range of locations and site typologies.
- 2.18. The Commissioners consider that the new Local Plan should make provision for a sufficient range of sites to maintain delivery throughout the Plan period. This should include strategic sites, sustainable urban extensions, smaller and medium sized sites, settlement edge opportunities and proportionate growth associated with sustainable rural and village communities. A balanced portfolio will be essential to maintain a five-year housing land supply, support affordable housing delivery, diversify the market and reduce reliance on speculative development.
- 2.19. The Commissioners' land interests at Wybunbury and Land North of Stock Lane, Shavington are directly relevant to this requirement for a diversified supply. The

Wybunbury landholdings provide opportunities to support proportionate village growth and small / medium site delivery, whilst Land North of Stock Lane, Shavington provides an opportunity for a comprehensively planned urban extension associated with an existing Local Service Centre.

3. Spatial Development Strategy

- 3.1. The Commissioners recognise that Cheshire East is now part of the Cheshire and Warrington Combined Authority area and that an emerging SDS will provide the strategic planning framework for the sub region. The NPPF, Policy PM1, confirms that SDSs should establish a positive vision for growth over a period of at least 25 years, provide a strategic framework for investment and infrastructure, identify broad locations for growth and regeneration, and apportion objectively assessed development needs across the strategy area.
- 3.2. The Commissioners support a co-ordinated approach to strategic planning across Cheshire and Warrington. However, it is important that preparation of the Cheshire East Local Plan is not delayed pending preparation of the SDS. The NPPF outlines in policies PM2 and PM10, that Local Plans should continue to progress, setting out a positive vision and spatial strategy for their area, whilst taking account of any emerging Spatial Development Strategy where relevant. Accordingly, the Local Plan should continue to identify sufficient land to meet development needs, assess a broad range of site opportunities and establish an appropriate spatial strategy, whilst retaining sufficient flexibility to respond to any strategic priorities that emerge through the SDS process.
- 3.3. Given the scale of housing need now facing Cheshire East, and the strategic role of the Crewe and Nantwich area within the wider region, the Commissioners consider that sustainable opportunities for growth associated with existing settlements, including Shavington and Wybunbury, should be assessed positively through the Local Plan process. This will ensure the Council is able to respond proactively to both local housing needs and wider strategic growth ambitions as the SDS evolves.

4. National Decision Making Policies

- 4.1. The Commissioners support the introduction of National Decision Making Policies ("NDMPs") and the Council's stated intention to avoid unnecessary duplication of national policy within the new Local Plan.
- 4.2. The NPPF is clear that development plans should not include policies which duplicate, substantively restate or are inconsistent with national policies for decision making (Policy PM6). The Commissioners also note that Annex A confirms the policies of the revised NPPF apply for Plan-making purposes from 17 August 2026 and that plans prepared under the new system should be produced in accordance with this Framework.
- 4.3. The Commissioners therefore support the preparation of a concise, focused Local Plan which concentrates on matters requiring local judgement and place specific responses. In accordance with Policy PM2, the Local Plan should focus on establishing a positive vision, spatial strategy, development requirements, site allocations and environmental improvements at the local level, rather than replicating nationally consistent development management policy.
- 4.4. The introduction of NDMPs provides an opportunity for Cheshire East to focus on those matters which are genuinely strategic to the Borough, including the housing requirement, settlement hierarchy, spatial distribution of development, site allocations, Green Belt review, infrastructure delivery, affordable housing requirements and locally specific environmental priorities.
- 4.5. In this context, the Commissioners consider that the preparation of the Local Plan should focus on identifying a sufficient range of deliverable and developable opportunities capable of supporting the Borough's growth objectives. Existing land interests promoted by the Commissioners at Wybunbury and Shavington demonstrate the different forms of growth that may be required to meet future needs, including smaller and medium sized sites that can support rural communities and larger, comprehensively planned extensions to sustainable settlements capable of delivering homes, affordable housing, infrastructure and environmental enhancements. The new Local Plan should therefore focus on establishing an appropriate spatial strategy and robust site selection framework, through which such opportunities can be assessed on their individual merits.
- 4.6. The Commissioners also note that Local Plans must be in general conformity with any adopted Spatial Development Strategy and aligned with wider strategic planning priorities. The Local Plan should therefore provide a locally distinctive framework for delivering growth within Cheshire East whilst relying upon NDMPs to provide a consistent national framework for decision making.

5. The Vision and Objectives

- 5.1. The Commissioners support the preparation of a clear, ambitious and deliverable vision for Cheshire East. The NPPF outlines in Policy PM2 that Local Plans should set out a positive vision and spatial strategy which supports the delivery of identified development needs and provides a framework for accommodating growth and improving the environment at a local level.
- 5.2. The Commissioners agree that the vision should be realistic, measurable and distinctive to Cheshire East. However, it should also recognise the significantly changed planning context since adoption of the current Local Plan, including increased housing requirements, the emerging Cheshire and Warrington Spatial Development Strategy, the need to support economic growth, and the importance of delivering infrastructure, affordable housing and environmental enhancement alongside new development.
- 5.3. The vision should articulate how Cheshire East will meet its development needs in a sustainable manner over the plan period, consistent with Policy S1 of the NPPF. In particular, it should support a broad and flexible pattern of growth which reflects the Borough's diverse settlement structure and ensures that appropriate opportunities for development are identified across principal towns, service centres and sustainable rural communities.
- 5.4. In this context, the Commissioners consider that the vision should support both larger strategic growth opportunities and proportionate development associated with existing settlements, recognising the contribution that different site typologies can make towards housing delivery, affordable housing provision, infrastructure investment and the long-term vitality of communities. This includes smaller and medium sized opportunities associated with villages such as Wybunbury, alongside larger planned extensions to sustainable settlements such as Shavington.
- 5.5. The measurable outcomes supporting the vision should focus on matters that genuinely demonstrate success, including housing delivery, affordable housing provision, infrastructure delivery, biodiversity enhancement, economic growth and maintaining a sufficient supply of deliverable development sites throughout the plan period.

6. Planning for Growth

Identifying and Assessing Sites

- 6.1. The Commissioners support the Council's commitment to preparing a robust and evidence led assessment of potential development sites. The NPPF clearly outlines in policies, PM2, PM8 and PM9 that Local Plans should positively plan for future growth and identify sufficient land to meet development needs, supported by proportionate and up to date evidence.
- 6.2. Given the significant increase in housing need identified through the revised standard method, it is essential that the site assessment process identifies a broad range of potential development opportunities capable of contributing towards housing, employment and wider growth objectives. The Commissioners therefore support the Council's commitment to assess sites submitted through the previous Call for Sites exercises in 2024 and 2026 and the intention to assess all promoted sites through a consistent and transparent process.
- 6.3. Policy PM9 requires Local Plans to be informed by a thorough site identification process and an assessment of site availability, suitability and achievability. It also requires the identification of a sufficient range and quantity of sites capable of meeting development needs. The Commissioners consider that this is particularly important in Cheshire East given the current housing land supply position and the significantly increased housing requirement that the emerging Local Plan will need to address.
- 6.4. The Commissioners welcome the preparation of a land availability assessment methodology. However, the methodology should avoid applying overly restrictive filters at an early stage which could prematurely exclude otherwise sustainable and deliverable development opportunities. Sites should be assessed on their individual merits having regard to their availability, suitability, achievability, relationship to existing settlements, infrastructure requirements and potential contribution towards identified development needs.
- 6.5. In this context, the Commissioners request that land interests previously promoted through the Call for Sites process at Wybunbury and Land North of Stock Lane, Shavington continue to be assessed positively through the emerging evidence base. These sites represent different but complementary opportunities to contribute towards the Borough's future housing supply, including smaller and medium sized opportunities capable of supporting the vitality of rural communities, alongside larger sustainable settlement edge growth associated with an existing Local Service Centre.
- 6.6. The Commissioners also consider that the site assessment process should ensure an appropriate balance between strategic allocations, sustainable urban extensions, small and medium sized sites and opportunities associated with existing villages and service centres. Such an approach would be consistent with the NPPF's emphasis on maintaining a diverse supply of development opportunities and ensuring a realistic prospect of delivery throughout the plan period.
- 6.7. The Commissioners welcome the opportunity to engage further with the Council as the land availability assessment methodology and initial site assessments are prepared and published through future stages of the Local Plan process.

Strategic Gap

- 6.8. The Commissioners recognise the important role that strategic green gaps can play in maintaining the separation and identity of settlements. Given that strategic green gaps are locally derived designations and are not defined through national policy, it is appropriate that the Council reviews their role, function and future purpose as part of the emerging Local Plan evidence base.
- 6.9. The Commissioners support the preparation of updated evidence examining the effectiveness and function of the existing strategic green gap. Any future designation should be informed by a robust assessment of the extent to which land contributes to maintaining settlement separation, preventing coalescence and preserving the character and identity of individual communities.
- 6.10. The Commissioners consider that the strategic green gap should not be treated as an absolute constraint to development. Instead, the assessment should recognise that not all land within a designated gap performs the same function and that the scale of Cheshire East's development needs may require a balanced assessment between preventing coalescence and accommodating sustainable growth. The emerging evidence should therefore identify those areas that are most important to maintaining separation, whilst recognising opportunities where development could be accommodated without materially undermining the overall function of the designation.
- 6.11. In this regard, growth associated with existing settlements should be assessed on a case by case basis having regard to settlement form, landscape character, the contribution made to maintaining separation and the ability to retain a meaningful gap between neighbouring settlements. The Commissioners consider that this approach will provide a more robust basis for future policy than reliance on existing strategic green gap boundaries alone.

Settlement Hierarchy

- 6.12. The Commissioners support the Council's intention to review the settlement hierarchy as part of the preparation of the new Local Plan. Given the significantly increased housing requirement now facing Cheshire East, the settlement hierarchy will play an important role in informing the spatial distribution of development, site allocations and future settlement boundaries.
- 6.13. The Commissioners agree that Cheshire East's diverse settlement pattern justifies the continued use of a settlement hierarchy. However, the hierarchy should be informed by a robust and up to date evidence base which reflects the role and function of settlements, rather than relying solely on their size or population. In particular, consideration should be given to the availability of services and facilities, employment opportunities, accessibility by sustainable transport modes, settlement form, community infrastructure and the relationship between settlements.
- 6.14. The Commissioners support the Council's proposed evidence-based review and note that Policy PM8 of the NPPF requires plans to be informed by relevant, proportionate and up to date evidence. The emerging hierarchy should therefore reflect how settlements function today and how they are likely to function over the plan period, rather than simply replicating the approach taken in the current Local Plan.
- 6.15. In this regard, the Commissioners consider that the relationship between settlements should be an important consideration. National policy recognises that development in one settlement can support the vitality and sustainability of neighbouring communities.

This is particularly relevant in areas where settlements form part of a wider network of villages, service centres and towns which share services, facilities and employment opportunities.

- 6.16. The Commissioners note that Shavington is currently identified as a Local Service Centre and performs an important role within the wider Crewe and Nantwich area. The ongoing review should ensure that the settlement hierarchy appropriately reflects the role of Local Service Centres in accommodating sustainable growth and supporting the delivery of the Borough's increased housing requirement.
- 6.17. The Commissioners also consider that settlements within the wider Shavington, Wybunbury, Nantwich and Crewe area should be assessed having regard to their functional relationships, accessibility and contribution to the wider settlement network. This includes the ability of appropriately scaled development to support local services, housing delivery and community sustainability.
- 6.18. The emerging settlement hierarchy should ultimately provide a clear and flexible framework capable of supporting the spatial strategy of the new Local Plan, ensuring that sustainable development opportunities are assessed on their merits and that growth is directed towards locations capable of contributing positively to the delivery of homes, services, infrastructure and sustainable communities.

Spatial Distribution

- 6.19. The Commissioners support the Council's recognition that the spatial distribution of development will be one of the most important components of the new Local Plan. The NPPF is clear that Local Plans should set out a positive vision and spatial strategy which supports the delivery of identified development needs and provides a framework for accommodating growth in sustainable locations (Policies PM2 and S1).
- 6.20. Given the significant increase in housing need now facing Cheshire East, the spatial strategy should be informed by a balanced consideration of housing delivery, affordability, employment growth, infrastructure capacity, environmental constraints and the need to maintain a flexible and deliverable supply of development opportunities throughout the plan period. The Commissioners support the range of factors identified by the Council as relevant to this assessment.
- 6.21. In particular, the spatial strategy should respond positively to the requirement within Policy S1 to meet development needs in full wherever possible and to promote a sustainable pattern of growth. The Local Plan should therefore seek to identify a broad portfolio of development opportunities capable of contributing towards housing delivery, affordable housing provision, economic growth and infrastructure investment.
- 6.22. The Commissioners consider that the spatial strategy should not be overly reliant on any single source of supply, settlement tier or development typology. Whilst the principal towns and key service centres will clearly continue to accommodate a significant proportion of future growth, the scale of development now required is likely to necessitate a range of approaches, including urban regeneration, sustainable urban extensions, growth associated with Local Service Centres and appropriately scaled development capable of supporting sustainable rural communities.
- 6.23. This approach would accord with Policies HO3 and HO4 of the NPPF, which require Local Plans to identify a sufficient supply and mix of sites capable of meeting development needs and recognise the important role that both strategic scale growth locations and

other deliverable development opportunities can play in maintaining housing supply throughout the plan period.

- 6.24. The Commissioners consider that the wider Crewe, Nantwich, Shavington and Wybunbury area represents an important component of the Borough's future growth strategy. The area benefits from an established settlement network, access to employment opportunities, existing infrastructure and strong functional relationships between settlements. As such, opportunities for growth should be assessed holistically rather than solely by reference to existing settlement boundaries or administrative designations.
- 6.25. In this regard, different site typologies are capable of making complementary contributions to meeting development needs. Land North of Stock Lane, Shavington represents a potential opportunity for comprehensively planned settlement edge growth associated with an existing Local Service Centre, whilst the Commissioners' land interests at Wybunbury provide opportunities for smaller and medium sized development capable of supporting housing delivery, affordable housing provision and the vitality of rural communities. Both forms of growth should be considered through the preparation of the emerging spatial strategy.
- 6.26. The Commissioners therefore support a spatial strategy that provides sufficient flexibility to accommodate growth across a range of sustainable locations and settlement types. Such an approach would enhance resilience within the housing land supply and provide the greatest opportunity to deliver the homes, infrastructure and community benefits required to support Cheshire East's future growth ambitions.

7. Housing

- 7.1. The Commissioners support the Council's ambition to deliver sufficient homes in appropriate locations across the Borough. The NPPF is clear that Local Plans should plan positively to meet development needs and provide for objectively assessed housing needs as a minimum (Policies S1, HO1 and HO2).
- 7.2. The Commissioners agree that the Housing Needs Assessment will play an important role in understanding the quantity, type and tenure of housing required across Cheshire East. In accordance with Policy HO1, this should consider the needs of a range of groups, including households requiring affordable housing, older people, disabled people, families with children, self and custom builders, and those requiring specialist accommodation.
- 7.3. Given the significant increase in housing need now facing Cheshire East, the Local Plan should identify a sufficient supply and mix of sites capable of delivering the full range of housing needed across the Borough. This should include strategic allocations, urban extensions, small and medium sized sites and opportunities associated with existing service centres and sustainable rural communities, thereby ensuring a resilient and diverse housing supply throughout the Plan period.

Affordable Housing

- 7.4. The NPPF places increased emphasis on affordable housing delivery through Policy HO5 and requires Local Plans to establish requirements for the type and mix of affordable housing required to meet identified local needs, including the minimum proportion of Social Rent housing. The Commissioners therefore support the preparation of updated evidence to inform future affordable housing requirements.
- 7.5. The Commissioners consider that maintaining a sufficient supply of viable and deliverable housing sites will be essential if affordable housing needs are to be addressed. Land North of Stock Lane, Shavington demonstrates how larger scale growth opportunities can support the delivery of significant levels of affordable housing alongside open space, green infrastructure and supporting infrastructure. Equally, smaller and medium sized sites can contribute to affordable housing delivery and housing choice within rural communities where local needs often remain unmet.
- 7.6. Affordable housing requirements should be informed by robust evidence and viability testing to ensure that policy ambitions remain deliverable. Ensuring a broad range of site opportunities come forward across the Borough will be critical to maintaining affordable housing delivery throughout the plan period.

Housing Mix

- 7.7. The Commissioners support the Council's intention to review housing mix requirements through the preparation of the Housing Needs Assessment. The NPPF requires Local Plans to address the housing needs of different groups and ensure that appropriate consideration is given to housing type, size and tenure requirements (Policies HO1 and HO5).
- 7.8. The Commissioners agree that the Local Plan should respond to changing demographics, affordability pressures and evolving household needs. This is particularly

important given Cheshire East's ageing population and the need to provide opportunities for younger households to access housing throughout the Borough.

- 7.9. Future housing mix policies should remain sufficiently flexible to respond to site specific circumstances and changing market conditions over the plan period. Whilst larger sites may be capable of accommodating a broad range of house types, tenures and specialist accommodation, smaller sites can also play an important role in delivering housing diversity and supporting local housing needs.
- 7.10. The Commissioners consider that a broad portfolio of development opportunities will be required to achieve an appropriate housing mix across Cheshire East. In this respect, larger growth opportunities associated with settlements such as Shavington can contribute towards a wide range of housing needs, whilst smaller and medium sized opportunities associated with locations such as Wybunbury can help diversify supply and support the delivery of housing in sustainable rural locations.

Housing diversification and providing for small and medium sized sites

- 7.11. The Commissioners strongly support the Government's emphasis on housing diversification and the provision of small and medium sized sites. Policy HO6 of the NPPF requires Local Plans to allocate land to accommodate at least 10% of the housing requirement on sites no larger than one hectare, together with a further 10% on sites between one and 2.5 hectares, unless there are strong reasons why these targets cannot be achieved.
- 7.12. The Council's own assessment demonstrates the scale of this challenge. Based on the current minimum housing requirement of 37,950 dwellings over the Plan period, approximately 7,590 dwellings would need to be delivered through small and medium sized sites in order to meet the expectations of NPPF Policy HO6. This will require a proactive and flexible approach to site identification and allocation.
- 7.13. The Commissioners also note that NPPF Policy HO6 specifically requires Local Plans to allocate sites which support and enhance the vitality of rural communities and enable villages to grow and thrive, particularly where this supports local services. The Commissioners consider that this is highly relevant to settlements such as Wybunbury and should be a key consideration in the Council's approach to site assessment and spatial distribution.
- 7.14. It should be noted that smaller and medium sized sites are often capable of being delivered earlier in the plan period, widening participation by SME housebuilders and contributing to a more resilient housing land supply.
- 7.15. In this regard, the Commissioners' land interests at Wybunbury represent opportunities capable of contributing towards the objectives of Policy HO6 by supporting proportionate growth associated with an existing rural community. Alongside larger opportunities such as Land North of Stock Lane, Shavington, these sites demonstrate the importance of maintaining a range of site typologies capable of contributing to housing delivery throughout the Plan period.
- 7.16. The Commissioners therefore support a site allocation strategy which provides an appropriate balance between strategic growth opportunities, sustainable urban extensions, small and medium sized sites, and development capable of supporting the vitality of rural communities. Such an approach would strengthen flexibility, improve deliverability and assist the Council in maintaining an ongoing supply of housing land throughout the plan period.

8. Transport and Infrastructure

- 8.1. The Commissioners support the Council's recognition that transport and infrastructure are fundamental to delivering sustainable growth. The NPPF adopts a vision-led approach to transport planning and requires sustainable transport considerations to be embedded within plan making from the earliest stages (Policy TR1). This should ensure that housing, employment and infrastructure planning are considered together through preparation of the new Local Plan.
- 8.2. The Commissioners agree that transport, utilities, digital infrastructure, green infrastructure, health provision, education and community facilities will all play a key role in supporting future growth. In accordance with Policies PM12 and HC1, infrastructure planning should be integrated with site allocation and spatial strategy work so that the infrastructure required to support development is identified at an early stage and delivered alongside growth.
- 8.3. The Local Plan should take a proportionate and evidence-led approach to transport assessment. Policy TR3 recognises that development should be directed towards locations that support sustainable patterns of movement and make effective use of existing or planned transport infrastructure. This should include consideration of opportunities to improve active travel, public transport accessibility and connections to existing services and facilities, particularly where such improvements can be supported through new development.
- 8.4. The Commissioners also note the strategic importance of Crewe as one of the UK's principal rail hubs and a key focus for investment, connectivity and economic growth within Cheshire East and the wider region. The town's rail links provide access to regional and national employment markets and reinforce the role of the wider Crewe functional area as a sustainable location for growth. The Local Plan's transport and infrastructure strategy should recognise the contribution that well connected settlements within the wider Crewe area can make towards accommodating future housing and economic growth in locations with strong existing and potential sustainable transport connections.
- 8.5. The Commissioners consider that infrastructure requirements should be viewed not only as a constraint on development but also as an opportunity. Well planned development can make important contributions towards transport improvements, community facilities, green infrastructure and wider public benefits. This is particularly relevant in the context of larger strategic and settlement edge allocations which can help fund and deliver supporting infrastructure.
- 8.6. The Commissioners therefore support the preparation of the Infrastructure Issues and Context Report and Infrastructure Delivery Plan. These documents should inform both the spatial strategy and site assessment process, ensuring that development opportunities are assessed having regard to their ability to support sustainable patterns of growth and contribute positively towards the infrastructure needs of existing and future communities.

- 8.7. In this regard, opportunities associated with existing settlements should be assessed taking account of their relationship to services, facilities, employment opportunities and sustainable transport networks, alongside their ability to accommodate infrastructure improvements where required. The Commissioners consider that this will be particularly important in the assessment of growth opportunities within the wider Crewe, Nantwich, Shavington and Wybunbury area, where development can help reinforce existing service centres whilst contributing towards wider infrastructure and connectivity objectives.

9. Natural Environment

- 9.1. The Commissioners support the Council's commitment to protecting and enhancing the natural environment as part of the preparation of the new Local Plan. The NPPF recognises the importance of safeguarding environmental assets whilst also supporting sustainable growth, and places particular emphasis on nature recovery, strengthening ecological networks, biodiversity enhancement and the delivery of multifunctional green infrastructure.
- 9.2. The Commissioners support the preparation of an evidence base informed by the Cheshire and Warrington Local Nature Recovery Strategy ("LNRS"), Strategic Flood Risk Assessment and other relevant environmental studies. Policy N1 of the NPPF requires Local Plans to identify opportunities for habitat restoration, landscape enhancement and biodiversity recovery, whilst also ensuring that development needs can be accommodated in a sustainable manner.
- 9.3. The Commissioners agree that environmental considerations should be fully integrated into the site assessment and allocation process. However, environmental designations and opportunities identified through the LNRS should not automatically preclude development. Policy N1 expressly recognises that areas identified through Local Nature Recovery Strategies can represent opportunities to integrate development with environmental restoration and enhancement.
- 9.4. The Local Plan should therefore seek to align growth and environmental objectives rather than treating them as competing priorities. Strategic allocations, sustainable urban extensions and other development opportunities can play an important role in delivering new habitats, strengthening ecological networks, providing green infrastructure, securing biodiversity net gain and improving public access to natural greenspace.
- 9.5. The Commissioners support a landscape-led and infrastructure-led approach to development which incorporates existing natural features wherever possible and delivers meaningful environmental enhancements as part of well-designed places. This approach is reflected within Policies N1, N2 and N3 of the NPPF, which encourage habitat enhancement, nature-based solutions, green infrastructure, tree planting, biodiversity improvements and sustainable water management.
- 9.6. In this context, larger planned allocations can provide significant opportunities to deliver environmental benefits at a scale that is often difficult to achieve through smaller or ad hoc development proposals. The Local Plan should therefore recognise the role that strategic and comprehensive developments can play in delivering biodiversity net gain, habitat connectivity, open space, SuDS, woodland planting and wider LNRS objectives alongside housing and infrastructure delivery.
- 9.7. The Commissioners also support the use of green infrastructure standards and biodiversity enhancement measures that are evidence based, justified and deliverable. Consistent with Policy N1, any local biodiversity net gain requirements exceeding national standards should only be applied where fully justified and to specific allocations where their delivery has been demonstrated to be achievable.
- 9.8. Overall, the Commissioners consider that the Local Plan presents an important opportunity to deliver environmental enhancement at a landscape scale whilst

accommodating the development required to meet Cheshire East's housing, economic and infrastructure needs. The site selection process should therefore consider not only the environmental constraints associated with development, but also the environmental benefits that well-planned development can deliver over the lifetime of the Plan.

10. Health and Wellbeing

Active Travel

- 10.1. The Commissioners support the Council's recognition of the important role that active travel can play in improving health outcomes, reducing emissions and supporting more sustainable patterns of movement. Policies TR1, TR3 and TR4 of the NPPF place significant emphasis on integrating walking, wheeling and cycling into both plan-making and the design of new development.
- 10.2. The Local Plan should seek to maximise opportunities for active travel by directing growth towards locations with good access to services, facilities, employment opportunities and public transport. New development should also be expected to provide safe, attractive and convenient walking and cycling connections both within sites and to surrounding communities.
- 10.3. The Commissioners consider that active travel should form an integral component of the spatial strategy and site allocation process. In particular, opportunities should be taken to strengthen connections between settlements, local centres, schools, employment destinations, public transport interchanges and areas of public open space as part of the delivery of new development.

Climate Change

- 10.4. The Commissioners support Cheshire East Council's commitment to addressing climate change and recognise the important role that the planning system can play in both reducing emissions and adapting to the effects of climate change. The preparation of a Climate Change and Renewable Energy Study will provide an important evidence base for future policy development.
- 10.5. The most effective contribution that the Local Plan can make towards climate objectives is through the location and design of growth. Consistent with Policies S1, TR1 and TR3 of the NPPF, development should be directed towards sustainable locations that reduce the need to travel, support active travel and public transport use, and make effective use of existing infrastructure.
- 10.6. The Commissioners also support the integration of climate resilience measures into future development. Taking a proportional approach on a site-by-site basis this could include green infrastructure, urban greening, tree planting, biodiversity enhancement, renewable energy opportunities, sustainable drainage systems and measures that help communities adapt to increasing flood risk and extreme weather events.
- 10.7. Climate objectives should be considered alongside the need to deliver homes, employment and supporting infrastructure. The Commissioners consider that a Plan-led approach to growth provides the best opportunity to achieve both objectives simultaneously, ensuring that development makes a positive contribution towards Cheshire East's long-term environmental, social and economic sustainability.

11. Design

- 11.1. The Commissioners support the Council's focus on achieving high quality design and placemaking through the new Local Plan. The Commissioners agree that the Local Plan should focus on locally specific design priorities whilst relying on national policy and guidance for broader design principles. This approach is consistent with the NPPF, which encourages Local Plans to establish clear design expectations whilst avoiding unnecessary duplication of national policy.
- 11.2. Where the Council considers that site specific masterplans or design codes are necessary, the Local Plan should establish clear expectations regarding their purpose, scope and status. The preparation of such documents should not unnecessarily delay the allocation of sites, the implementation of development plan policies, or the determination of planning applications where development proposals demonstrably accord with the development plan and relevant design principles.
- 11.3. Given the scale of growth required across Cheshire East, it will be important that the Local Plan balances efficient use of land with the protection of local character and the creation of attractive, healthy and sustainable communities. This should include consideration of the principles set out in Policy DP3 relating to liveability, climate resilience, nature, movement, built form, public spaces and local identity.
- 11.4. The Commissioners consider that the Local Plan should focus on establishing a proportionate strategic framework for design and placemaking, allowing detailed matters to be addressed through the planning application process where appropriate. This will assist in balancing design quality with the need to deliver the significant levels of housing and infrastructure required across Cheshire East during the plan period.
- 11.5. For larger allocations and urban extensions, a proportionate masterplanning process can provide certainty regarding movement networks, green infrastructure, landscape structure, community facilities and development phasing. Such approaches should assist delivery rather than act as a prerequisite that delays the implementation of allocated sites.

12. Summary

- 12.1. The Commissioners support the preparation of a positively prepared, deliverable and aspirational Local Plan which responds to the significantly changed planning context arising from the revised standard method, new Plan-making system and updated NPPF.
- 12.2. The Consultation, along with the latest AMR published by Cheshire East Council demonstrates that the scale of housing need now facing the Borough is substantially greater than that which informed the adopted LPS. Whilst Cheshire East has performed strongly against previous housing delivery requirements, the current 3.3 year housing land supply position highlights the need for a larger and more resilient portfolio of development opportunities capable of meeting future needs.
- 12.3. The Commissioners therefore consider that the emerging Local Plan should plan for, as a minimum, the revised standard method housing requirement and should test whether a higher requirement is appropriate having regard to economic growth ambitions, infrastructure investment, affordable housing needs and the emerging Cheshire and Warrington Spatial Development Strategy.
- 12.4. The Local Plan should identify a sufficient supply and mix of deliverable and developable sites, including strategic allocations, sustainable urban extensions, Local Service Centre growth opportunities, smaller and medium sized sites, and proportionate development associated with sustainable rural communities. A diverse portfolio of sites will be essential to maintaining delivery, supporting affordable housing provision and complying with the requirements of NPPF Policies HO3 and HO6.
- 12.5. The Commissioners support a flexible and evidence-led approach to site assessment, settlement hierarchy review and spatial distribution. Existing designations and settlement classifications should not be treated as fixed constraints where evidence demonstrates that sustainable growth opportunities are capable of contributing towards the Borough's development needs.
- 12.6. The Commissioners' land interests at Wybunbury and Land North of Stock Lane, Shavington provide opportunities to contribute towards the delivery of the new Local Plan's objectives. The Wybunbury sites offer opportunities for proportionate village-edge growth and small and medium sized site delivery, whilst Land North of Stock Lane, Shavington provides an opportunity for a larger, comprehensively planned urban extension associated with an existing Local Service Centre.

Appendix 1 Strategic sites in Wybunbury submitted to Call for Sites

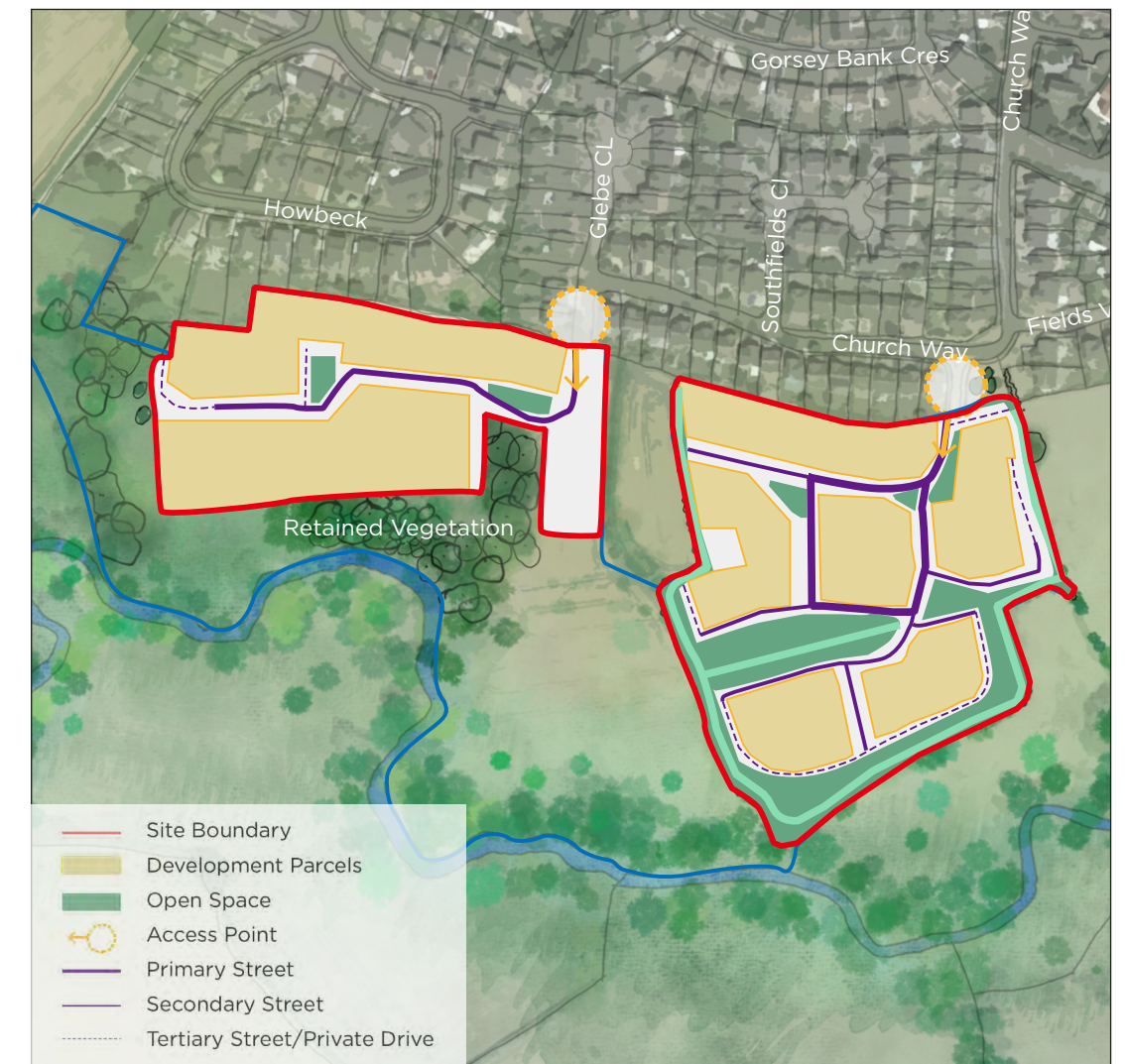


Land to North of Main Road

Site Area = 1.6 ha

Approximate Development Area =
1.29 ha

Estimated Development Capacity =
34 units @ 27dph



Land to South of Church Way – West and East

Ownership Area = 6.88 ha

Approximate Development Area

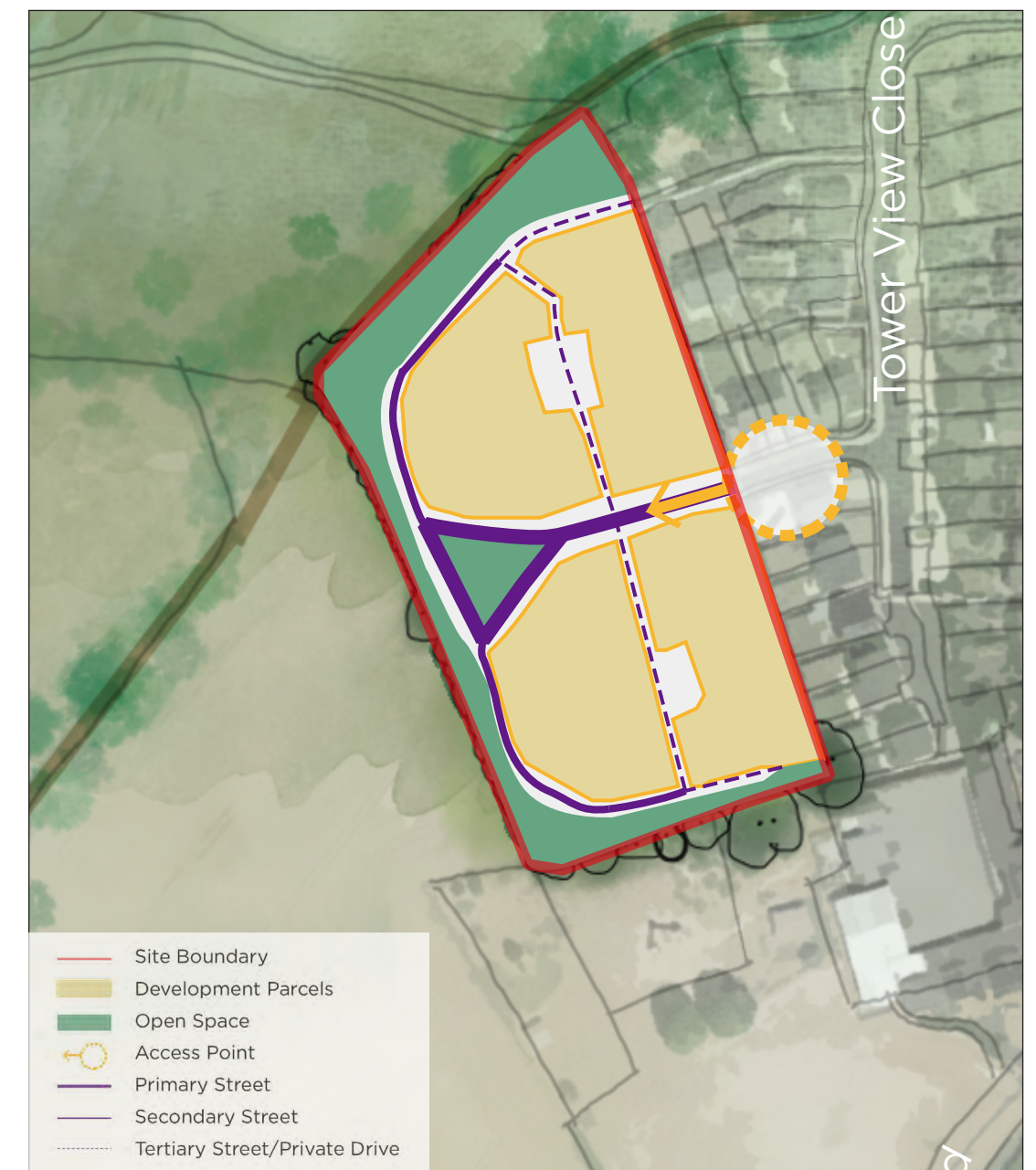
(west) = 1.06 ha

(east) = 1.90 ha

Estimated Development Capacity:

(west) = 32 units @ 30dph

(east) = 57 units @ 30 dph



Land West of Bridge Street

Site Area = 1.08 ha

Approximate Development
Area = 0.84 ha

Estimated Development
Capacity = 21 units @ 25dph

Appendix 2 Land North of Stock Lane, Shavington Vision Document

Shavington - Concept Plan

Cheshire

3004173_SHA-BDP-XX-XX-RP-00001_P03

Contents

1.0	Introduction	3
2.0	The Church Commissioners	4
3.0	Site Location	5
4.0	The Site	6
	4.1 Site Boundaries	6
	4.2 Site Photos	7
	4.3 Site Surroundings	8
	4.4 Site Constraints and Opportunities	9
5.0	Concept Options	10
6.0	Concept Masterplan	11
7.0	Concept Quantum	12

Rev	Date	Description
01	13.06.24	First Issue
02	19.06.24	Incorporating DRE Comments
03	27.06.24	Incorporating additional comments



1.0 Introduction

The Church Commissioners for England (CCfE) have appointed BDP to prepare a concept plan for the proposed development of their landholdings on the edge of Shavington, Cheshire.

This document provides an introduction to the applicant, the site and its surroundings. We consider the site constraints and opportunities for development.

This work has informed the preparation of a concept plan which achieves a balance between residential development and shared green spaces.

Deloitte Real Estate are leading this promotion process on behalf of CCfE.



1.1 - View North West across the site from the Southern edge.

Google



2.0 The Church Commissioners

The Church Commissioners support the Church of England's mission. They do this through responsible and ethical management of a diverse investment portfolio.

This portfolio includes commercial and residential properties along with rural land.

Their Strategic Land Team has the stated aim to deliver new homes and employment opportunities which support and deliver new homes and employment opportunities which support and enhance their local surroundings. They do this by seeking to build new, and strengthen existing, communities, helping to create and sustain and strengthen existing, communities, helping to create and sustain vibrant and vital places. The team has a strong track record of working collaboratively with key stakeholders including local communities, residents and local councils in order to deliver significant new housing developments.

The Strategic land team believe in and support the five core values defined by the Archbishops' Commission on Housing, Church and Community, which articulate a clear vision of what good housing should be –sustainable, safe, stable, sociable and satisfying. These values are an important step in building thriving and successful communities.

These aims underpin their requirements for design from the earliest stages of development through to how they manage relationships with developer partners to ensure the creation of schemes that provide high quality homes which respond to local distinctiveness and provide a mix of homes that meet local needs including, affordable provision.

The strategic land team have embedded environmental, social and governance (ESG) matters into their work to facilitate the transition to a net zero, low carbon future. By taking this approach the team aim to maximise the wider societal and environmental benefits that their developments deliver for all communities where they have a presence across England.

Further information on the approach of the Commissioners is available in their published 'Our approach to strategic land' document.



3.0 Site Location

The land in CCfE ownership sits 1 mile from the centre of Shavington on the western edge of the village. The land is also less than a mile to the centre of Wybunbury to the south.

Shavington is located 3.2 miles south of the centre of Crewe and 3.6 miles from the centre of Nantwich. Crewe offers fast regular rail connections to London, Manchester, Liverpool, and other key locations. The M6 motorway is 5.5 miles from Shavington easily accessed by the A500.

Car Journey Times from Shavington

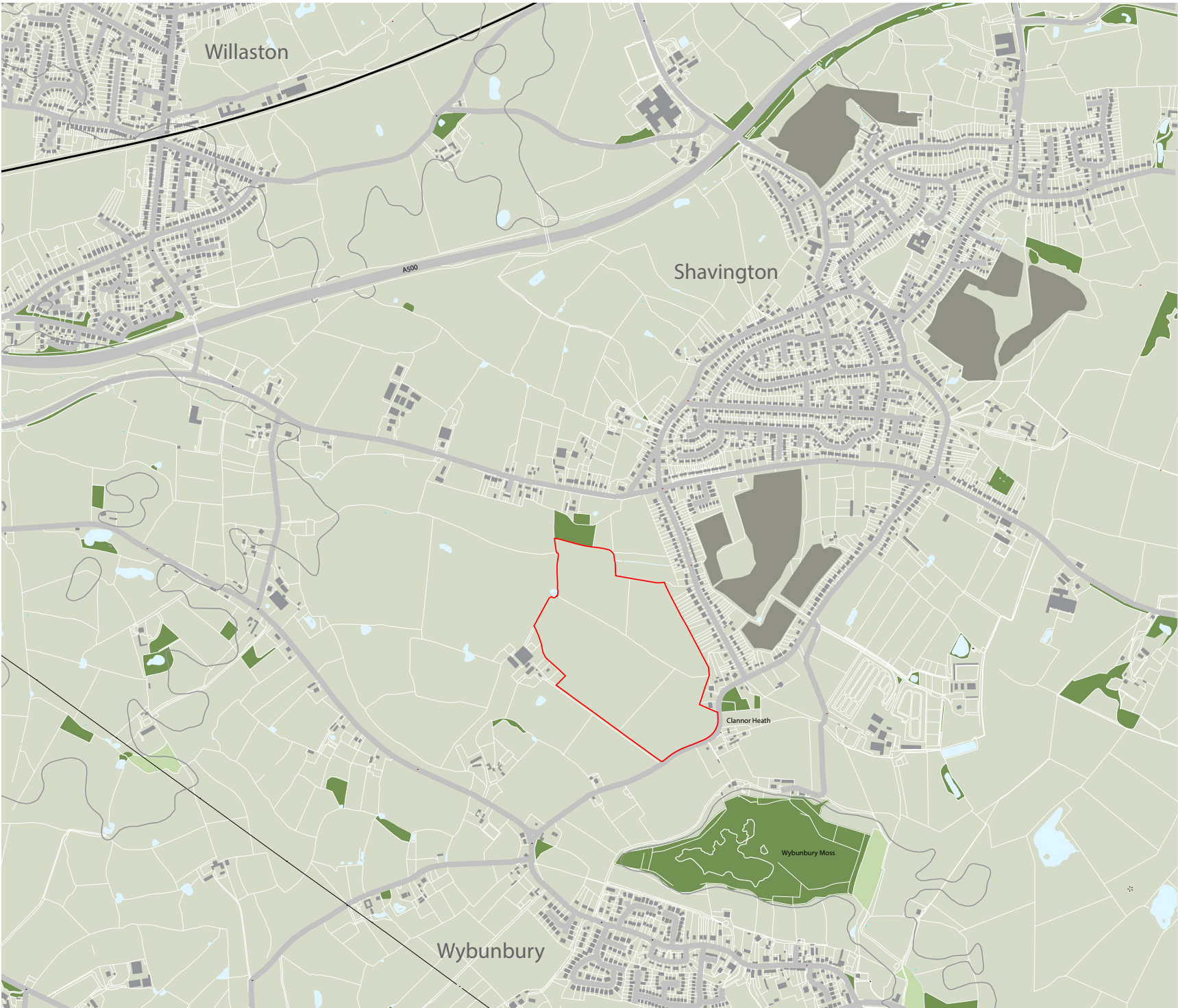
Nantwich Train station	9 min
Crewe Train station	7 min
M6	9 min
Manchester	60 min

Train Journey Times from Crewe

Manchester	1hr 15 min
Liverpool	1hr
Birmingham	1hr 45 min
London	2hr 30 min



3.1 - Shavington Location Plan.



3.2 - Site Location 1:15000



4.0 The Site

4.1 Site Boundaries

The site is shown bounded in red and covers **20.1 ha**. Ownership measures approximately 700m north to south and 450m east to west at its widest point.

Along the south western and north eastern boundaries are well established hedgerows, incorporating mature trees of varying species and sizes. They help to separate a collection of outbuildings belonging to a neighbouring farm to the west of the boundary, and the current edge of Shavington’s residential area on the north side of the site. The plot is divided by existing broken hedgerows, field lines and a handful of mature trees and small scale ponds. When looking south, you can see Wybunbury Moss nature reserve and the Tower of St Chads Church in the distance.

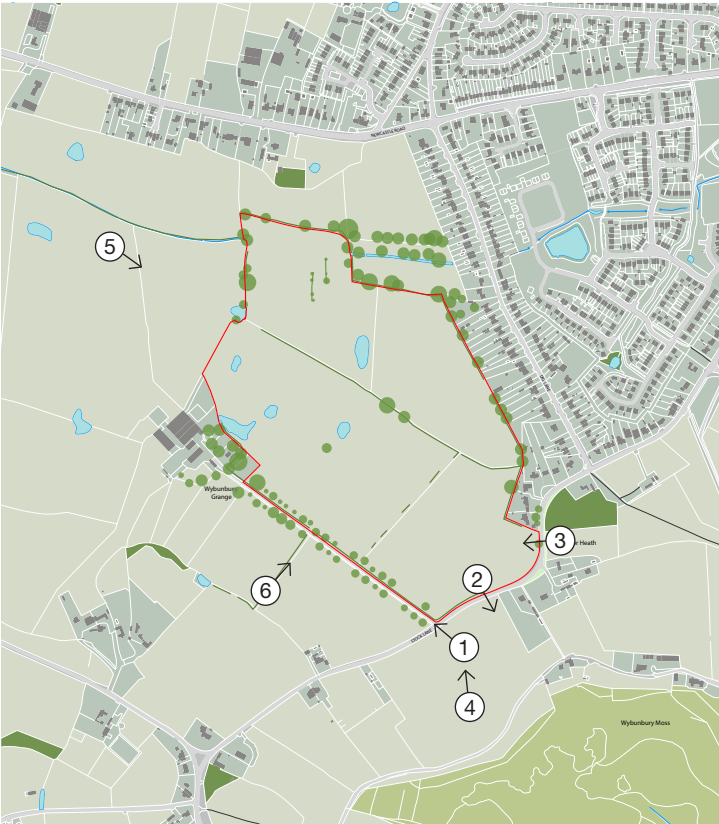
-  Site boundary
-  Existing woodland (non PAOS)
-  Existing settlement extents
-  Existing ponds
-  Existing tree
-  Existing hedgerow



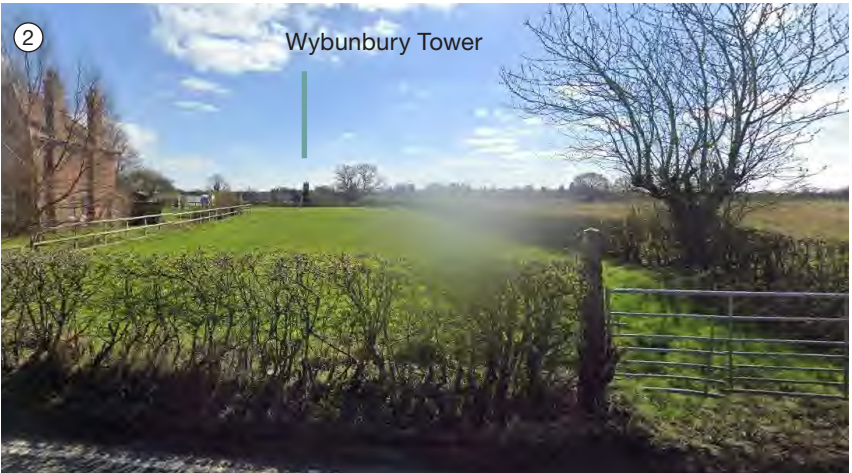
4.1.1 Site Plan 1:5000



4.2 Site Views



4.2.1 View Key



4.2.2 Site Views



Google



4.3 Site Surroundings

Shavington offers a range of local amenities, including both primary and secondary schools, churches, grocery stores, a GP surgery and various community facilities and clubs.

The extensive and dense local public right of way network offers amenity and access to Wybunbury Moss SSSI. Local sports facilities include a leisure centre at Shavington Academy, a bowls club and Crewe and Nantwich Rugby Club.

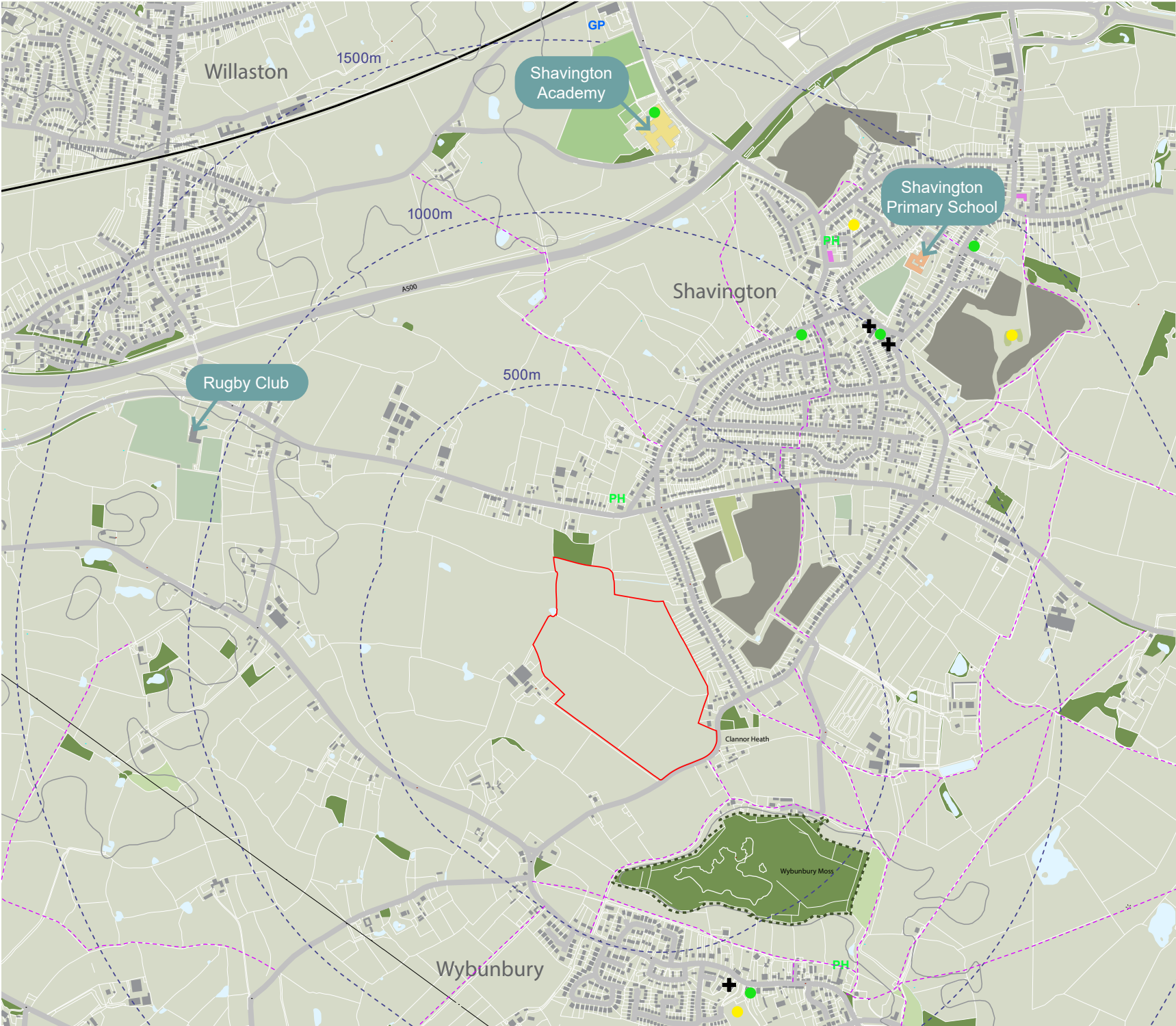
KEY

- Site boundary
- Secondary school
- Primary school
- Recent development
- Grocery store
- GP

 GP Surgery
- PH

 Public House
- Community building
- +

 Church
- Existing outdoor play area
- Existing sports pitches
- Existing school pitches
- Existing parks
- Existing Trees / Shrubs (not PAOS)
- Wybunbury Moss SSSI
- Existing settlement extents
- 500m intervals from site boundary
- Footpath - PROW
- Railway line



4.3.1 Site Location 1:15000



4.4 Site Constraints and Opportunities

Access to the site can be achieved from Stock Lane. Bus stops on the edge of the site provide links to Crewe and Nantwich. The site itself incorporates mature hedgerows, ponds and trees along boundaries which could provide structure to any new development. From the edge of the site near Stock Lane one can look across Wybunbury Moss towards St Chad's church tower providing a sense of place in the landscape, this could be come a key marker when leaving the site looking south across the moss.

KEY

- Site boundary
-
- Existing woodland (non PAOS)



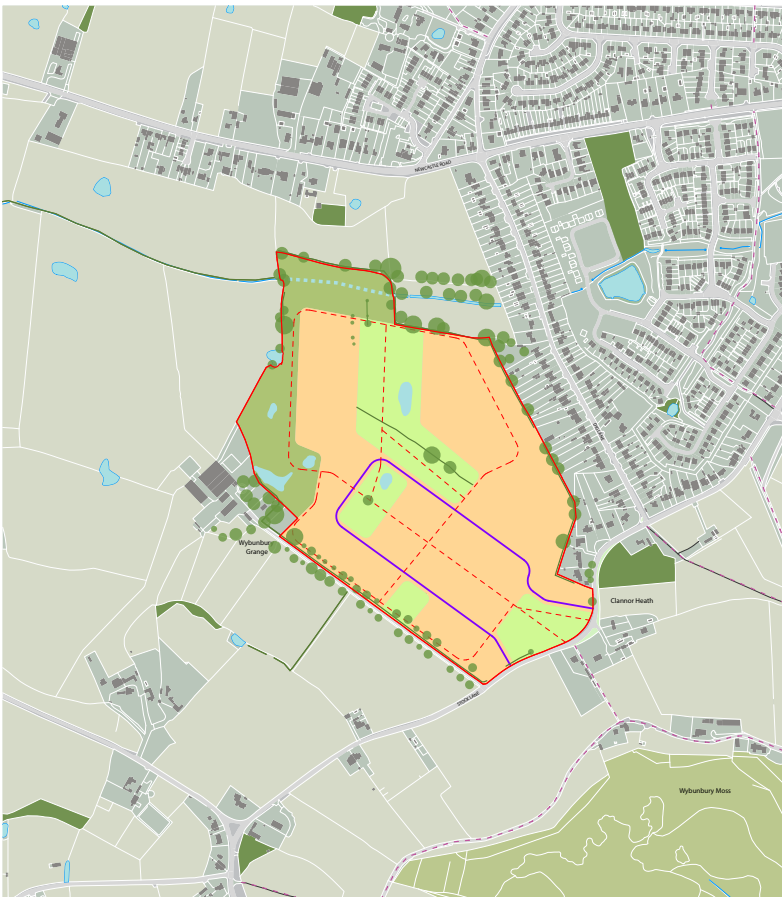
4.4.1 Site Plan 1:5000



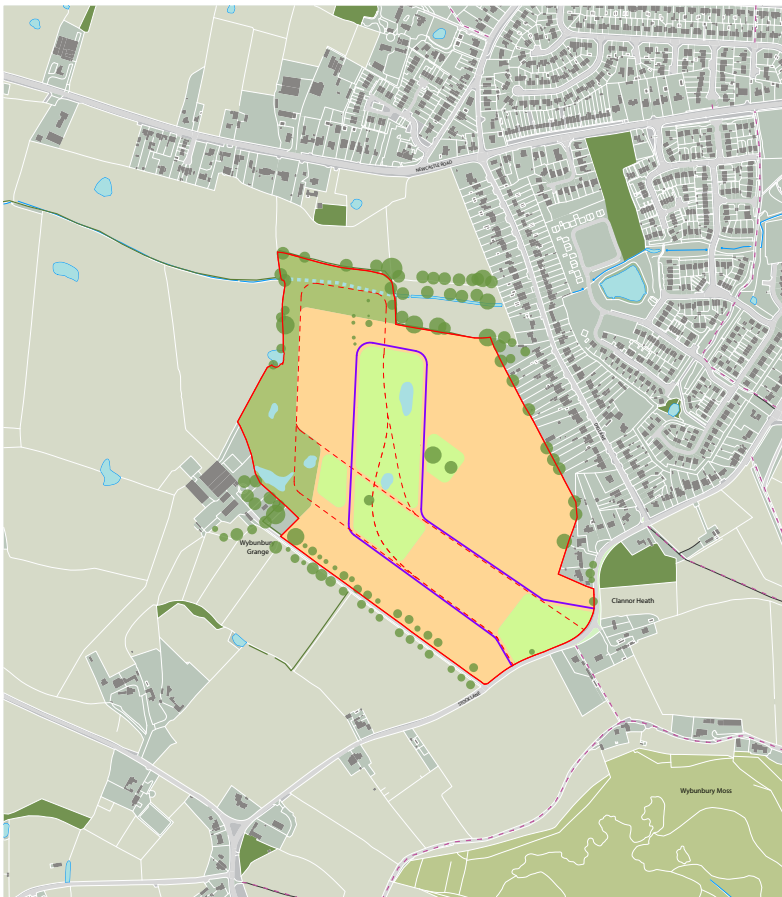
5.0 Concept Options

Three concept designs for the site have been developed. Each contain the same quantum of housing (around 385 homes), 3ha of land set aside for biodiversity net gain (BNG) and over 4ha of land for public open space incorporating sustainable urban drainage systems (SUDS). The main difference between the options is the length of primary road loop and the disposition of green space.

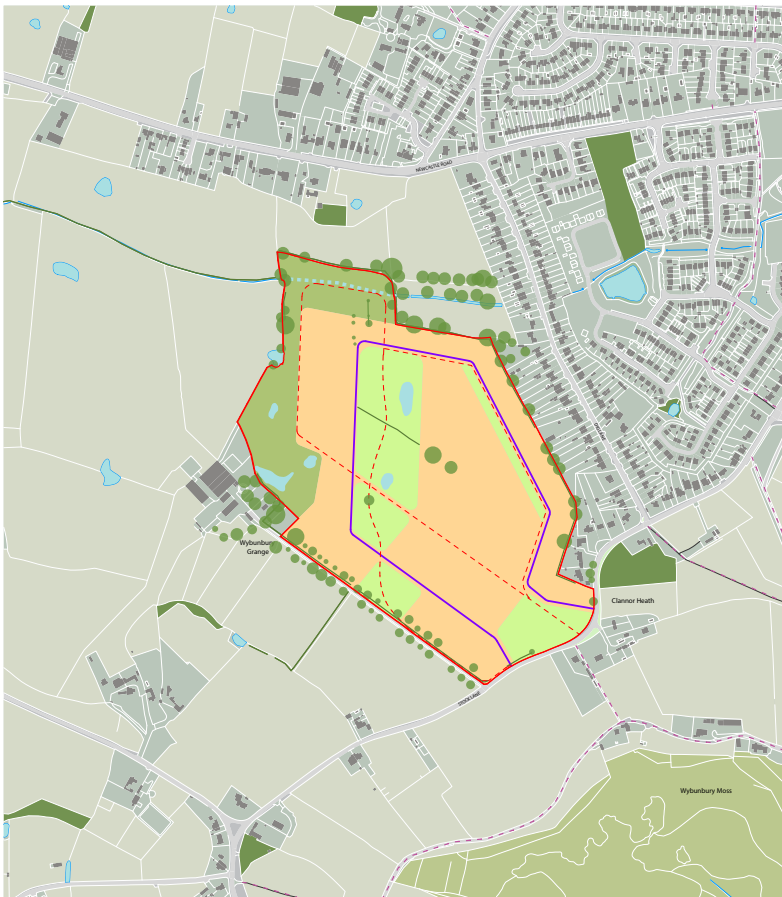
Option A has been selected as the preferred concept as it has the largest contiguous green space - providing enhanced ecological and amenity benefits, the shortest primary road route - providing larger areas of traffic calmed streets, and three distinct zones of housing giving a good local sense of place within the wider scheme.



5.1 Option A



5.2 Option B



5.3 Option C



6.0 Concept Masterplan

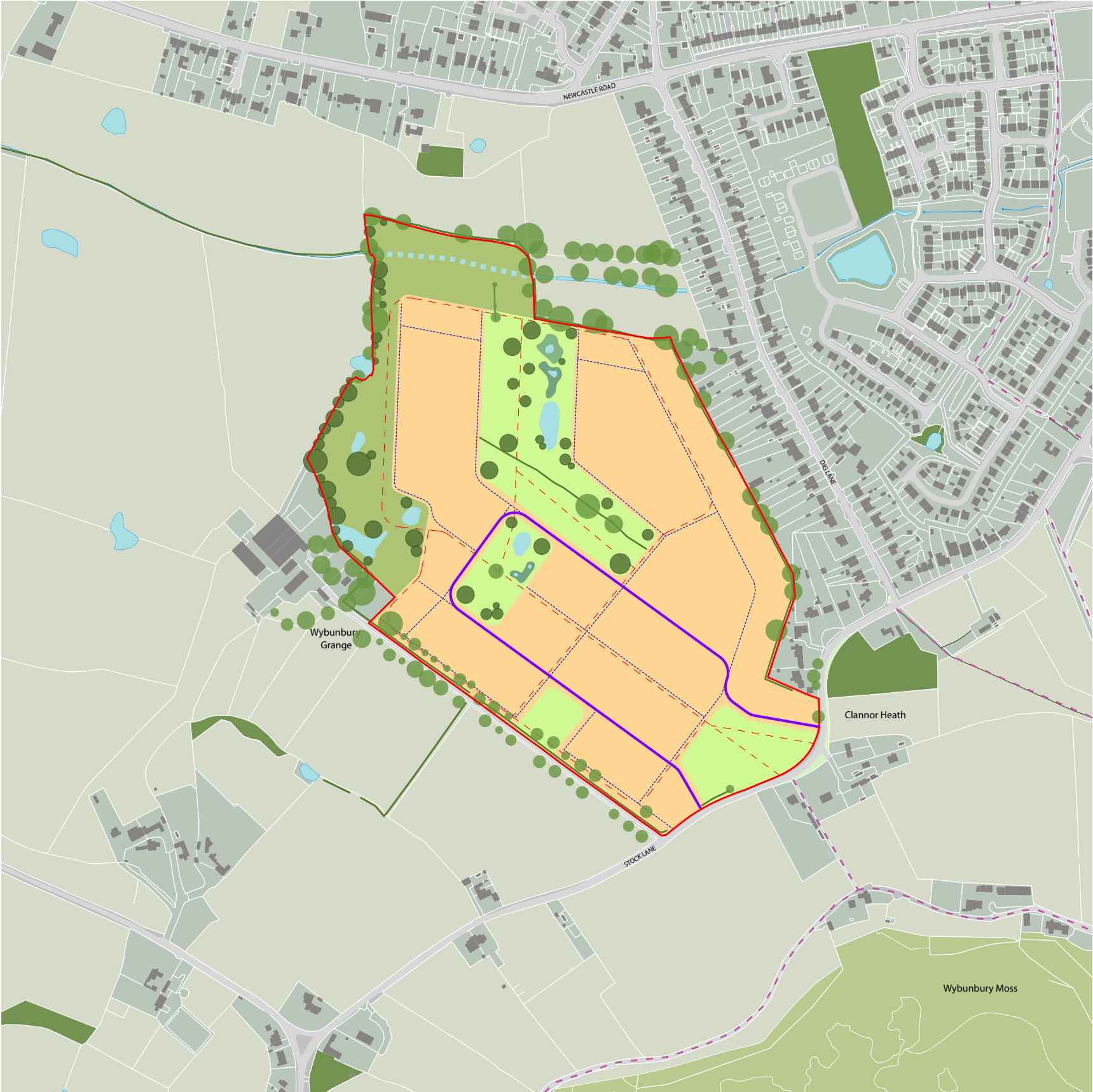
A biodiversity net gain set aside area has been located to encompass existing ponds, trees and the piped stream on site so that these elements can be used as a foundation for new nature areas. It is provided as a single space to ensure maximum BNG benefit. Public access to this space will be provided on footpaths offering additional amenity alongside enhanced habitats.

The public open space is located to incorporate existing trees and hedges on site and to provide a series of linked green spaces of varying character that connect from the biodiversity zone in the north to the public footpaths leading to Wybunbury Moss to the south.

A short primary road loop off which distinct development zones can be accessed. Higher density development (up to 35dpha) would be located around the primary route with lower density development (up to 25dpha) located away from the route.

The site offers the opportunity for the creation of a sustainable new area of homes, structured around high quality open space appropriate for its village edge location.

- Site boundary
- Existing woodland (non PAOS)
- Existing settlement extents
- Existing ponds
- Proposed SUDS area
- Proposed BNG set aside
- Proposed open green space
- Proposed development area
- Existing tree
- Proposed tree planting
- Pedestrian route
- Footpath - PROW
- Existing submerged stream
- Primary road
- Secondary road
- Existing hedgerow



5.1.1 Site Plan Option A 1:5000



7.0 Concept Quantum

The site has the potential to deliver up to 386 new homes at a density of 30 dwellings per hectare. It is expected that 30% of these homes would be provided as affordable dwellings in line with local policy.

The overall site density, taking into account the 2.9ha of PAOS and 1.3ha given over to SUDS is 23dpha, appropriate for a village edge location offering.

The 3ha BNG set aside area is in addition to the public open space and SUDS meaning that across the site 7.2ha are proposed to be given over to green space providing significant amenity for both new and existing residents.

Site Area		
Red Line Boundary (ha)		20.1
BNG Set Aside (15% site area assumed for 10% BNG overall) (ha)		3.015
Residential Development Area (ha)		17.085
Proposed Density		
Dwelling Density (dwellings/residential site area) (dpha)		30
Overall Site Density (dwellings / residential development site area) (dpha)		23
Proposed Residential Development Area Breakdown		
Residential Site Area (ha)		12.88
SUDS (10% Residential development area - assumption) (ha)		1.29
Strategic Playing Fields (outside development site area) (ha)		0.00
Public Open Space (2.6ha/1000 population) (ha)		2.92
Proposed Overall Housing Numbers		
Homes (no.)		386
Market Homes (no.)		270
Affordable Homes (30%, CE LP Strategy 2010-2030 , Policy SC5) (no.)		116
Population (no.)		1124



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1.1	View North West across the site from the Southern edge.	© Google Streetview
2.1	St Chad's Tower, Wybunbury (visible from the site).	© Andy and Hilary (commons.wikimedia.org/wiki/File:Wybunbury_tower.jpg).
3.1	Shavington Location Plan.	© BDP
3.2	Site Location 1:15000	© BDP based on OS data
4.1.1	Site Plan 1:5000	© BDP based on OS data
4.2.1	Site Plan	© BDP based on OS data
4.2.2	Site Views	© Google Streetview
4.3.1	Site Location 1:15000	© BDP based on OS data
4.4.1	Site Location 1:15000	© BDP based on OS data
5.1	Option A	© BDP based on OS data
5.2	Option B	© BDP based on OS data
5.3	Option C	© BDP based on OS data
5.1.1	Site Plan Option A 1:5000	© BDP based on OS data
5.2.1	Site Plan Option B 1:5000	© BDP based on OS data
5.3.1	Site Plan Option C 1:5000	© BDP based on OS data





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