



**Cheshire East Council
Local Plan Scoping
Consultation Response**

August 2026

**Strategic
Land Group**

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1. Introduction

- 1.1 This response to Cheshire East's Scoping Consultation has been prepared by The Strategic Land Group ('SLG'). It provides comments on matters which should be included in the new Local Plan and considered in its preparation.
- 1.2 SLG are promoting two sites in Cheshire East: Land off London Road in Nantwich and Land off Sunnybank Drive in Wilmslow. Both of these sites were submitted as part of the 2024 and 2026 Call for Sites exercises.
- 1.3 The land in Wilmslow is part of a wider area that is safeguarded for future development in the adopted Local Plan Strategy.
- 1.4 SLG and Perseus Land & Developments are engaged in pre-application discussions on the potential application for a care home on part of the Nantwich site. This would leave scope for market homes to be delivered on the remainder of the site.

2. Creating a vision and objectives

- 2.1 The Scoping Consultation is explicit that any aims and objectives for Cheshire East must be accompanied by measurable outcomes and distinctive to Cheshire East. These outcomes should be accompanied by a mechanism for their monitoring and subsequent intervention if those outcomes are not being delivered.
- 2.2 For example, a measurable outcome for meeting local housing need would involve the council monitoring the number of homes delivered annually against the trajectory set out in the Local Plan. If the delivery of homes falls short of expectations, intervention may be required (for instance, the activation of safeguarded land).
- 2.3 Although no indication is provided in the Scoping Consultation as to what the Local Plan vision should contain, or what objectives must be identified to meet that vision, SLG would emphasise the importance of objectives which address both the critical shortage of homes in Cheshire East and the need to align this with the ambition to create new jobs.

3. Planning for Growth

- 3.1 The Scoping Consultation sets out a minimum annual housing requirement of 2,530 homes over the plan period up to 2045, equivalent to a total of 40,480 homes. The standard method figure, which sets this minimum requirement, is in fact 2,531 - one dwelling more.
- 3.2 Even in a context of the national housing crisis, Cheshire East has a significant unmet need for new homes. Since 2023, the unmet housing need figure has increased significantly by almost 150%. This figure continues to increase each year.
- 3.3 Cheshire East is also unable to demonstrate a Five Year Housing Land Supply ('5YHLS'), which will need to be rectified through the new Local Plan. The latest Housing Monitoring Update, dated April 2025, identified a housing supply equivalent to 3.85 years. According to Emery Planning Consultants, the housing land supply for Cheshire East now sits at around 3.13 years¹. This demonstrates a clear need for the new Local Plan to make use of previously unconsidered sites for new homes, as well as those made logical through recent and upcoming development.
- 3.4 To further emphasise this need, the Council were unable to identify enough sites to meet unmet need from the 2024 Call for Sites submissions, necessitating a second round of Call for Sites in 2026. Not only must the Council look carefully at the sites put forward as part of this latter Call for Sites, but they must also plan with a significant degree of flexibility in order to meet the significant level of unmet need in Cheshire East.

¹ Paton, J and Pycroft, B. (2025). 'Assessment of Cheshire East's 5YHLS For Muller Property Group. (Available at: <https://pa.cheshireeast.gov.uk/planning/index.html?fa=getApplication&id=403969>)

The level of growth

- 3.5 It is absolutely vital that the Local Plan identifies sufficient land for residential development. Policy HO1 of the National Planning Policy Framework ('the Framework') confirms that the need identified by the Standard Method should only be considered a starting point:

*"The preparation of spatial development strategies, and local plans where a spatial development strategy is not in place, should 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..." (our emphasis).*

- 3.6 Policy HO1 is also clear that the housing needs of specific groups – including older people – should also be taken into account.

- 3.7 Policy HO2 notes that:

*"Housing requirement figures **should**...Be higher than the overall figure identified in the local housing needs assessment where appropriate. This includes situations where a higher housing requirement is necessary to meet the needs of neighbouring areas, or to reflect growth ambitions linked to economic development or infrastructure investment." (our emphasis)*

- 3.8 In determining the housing target for the new Plan, the Council should therefore assess the impact of any growth aspirations on housing need.

- 3.9 The housing target in the Local Plan should accommodate a significant supply-side contingency buffer in order to accommodate for unforeseen issues. The Local Plan Experts Group recommends an allowance of between 10-20%.

- 3.10 Given Cheshire East's significant unmet need and lack of a 5YHLS, the higher end of this range is most appropriate (i.e. 20%).

Identifying and assessing sites

- 3.11 The assessment of potential development sites should be done holistically - looking at the benefits and harms of development in the round - and take into account the potential for mitigation to off-set any harms identified.

Settlement hierarchy

- 3.12 SLG agree with the Council that producing a settlement hierarchy is an important step in deciding on the appropriate distribution of development, as set out in the Scoping Consultation. This will help direct development to the most sustainable locations.

Spatial distribution

- 3.13 The Scoping Consultation sets out a range of factors which will further influence the location of new development. These include demand for housing and its availability, as well as the need for specialist housing.
- 3.14 Such as the significant need for new homes in the borough, sites will need to be allocated across settlements of all types, guided by the Settlement Hierarchy. This should, however, take into account the extent to which new development can support existing services and facilities and ensure the sustainability of settlements is maintained.
- 3.15 The Scoping Consultation also acknowledges the need for edge of settlement growth, which SLG supports. The level of unmet housing need in Cheshire East means that growth cannot be accommodated solely within existing settlement boundaries.

Safeguarded Land in the adopted Local Plan

- 3.16 Although not discussed in the Scoping Consultation, the existing Local Plan Strategy 2010-2030 ('LPS') contains a policy to safeguard land for future development: Policy PG 4 Safeguarded Land. This states that:

*“Safeguarded land is land between the existing urban area and the inner boundary of the Green Belt that **may be required to meet longer-term development needs stretching well beyond the period of the Local Plan.**”*
(our emphasis)

- 3.17 This land is now required to meet the unmet housing need in Cheshire East well beyond the period of the LPS and within the plan period of the new Local Plan, as evidenced by Cheshire East’s significant unmet local housing need figure.
- 3.18 The sites identified in this policy should therefore be identified as allocations for housing in the new Local Plan, having already demonstrated through the LPS that they are appropriate for housing development. If the Council intends to alter the Green Belt boundaries as little as possible as part of the new Local Plan, these sites need to be allocated for new homes.

4. Housing

Affordable Housing

- 4.1 Cheshire East will need to deliver affordable homes through the new Local Plan.
- 4.2 Although no details are provided as part of this Scoping Consultation as to how the Local Plan will meet affordable housing requirements, SLG would caution the Council against simply including a large percentage requirement for new developments in order to satisfy requirements. This is due to the viability of potential developments varying significantly across Cheshire East. A robust evidencing of, and justification for, affordable housing provision will therefore be required for housing allocations in the Local Plan.
- 4.3 The best route to increasing the number of affordable homes in Cheshire East would be to simply increase the housing requirement, which provides more scope for affordable homes to be delivered across the plan period. This is supported by Paragraph 67-008 of the PPG which notes that “*An increase in the total housing requirement included in the plan may need to be considered where it could help deliver the required number of affordable homes.*”

Housing for older people and specialist accommodation

- 4.4 The Scoping Consultation confirms the need to identify sites for specialist housing, with a particular emphasis on older persons housing, including care homes. The Scoping Consultation also acknowledges the ageing population both nationally and locally (according to Census 2021, the number of people aged 50 to 64 increased by 13.9% while the number of residents between 35 and 49 years fell by 9.1%).

- 4.5 SLG supports this approach and emphasises that this need will likely become more acute over the course of the plan period, therefore requiring an ambitious level of care home provision.
- 4.6 According to care home developers in Cheshire East, there is a well-documented shortfall in registered care bed provision across Cheshire, with existing facilities increasingly unable to accommodate the demands of an ageing population and care standards which have modernised since the existing supply was built. There is not only the need for more care home facilities, but new care homes which meet current best practice guidance and Care Quality Commission standards.
- 4.7 Specialist housing for older people, in particular care homes, must be located in sustainable locations, close to large settlements (i.e. the first and second tier of the existing settlement hierarchy), having well served road frontages to support commuting care workers, and being within a 1km walk of accessible local services.
- 4.8 Opportunities for the provision of care homes as part of a wider market housing scheme should be considered as creative solutions to meeting unmet need. Not only does this allow for market housing schemes to deliver a share of specialist housing, but represents an approach which ensures care home residents feel they are integrated members of the local area rather than isolated from the wider community.

5. Employment and economy

- 5.1 The Scoping Consultation invites comments on whether the new Local Plan will need to identify new sites for employment land. The Council will conduct an Economic Development Needs Assessment and an Employment Land Review in order to consider the need in Cheshire East.
- 5.2 When considering this, the Council must consider the inseparable link between the growth of both housing and employment development. An ambitious economic growth strategy may need to be supported by the delivery of additional homes, for example.

6. Local Plan evidence base

New evidence

- 6.1 The Scoping Consultation sets out that a Viability Assessment will be completed as part of the emerging Local Plan, which SLG supports as an essential step in assessing the deliverability of proposed housing sites.
- 6.2 The viability of residential development is a significant challenge for home builders. For example, research from Zoopla has revealed that residential development is unviable in 48% of England. This is a result of build cost increasing far more rapidly than house prices in recent years. Although house prices have increased by around 20% since 2020, construction costs have risen by more than 35%².
- 6.3 While some of those increases are a result of inflationary pressures in the wider economy, house building has been particularly impacted by increased regulatory costs. These increases are set to continue, with the Future Homes Standard set to add c. £9,700 to the cost of an individual dwelling³, along with further increases deriving from the Building Safety Levy and a doubling of landfill tax at the last budget (which will add £2,000 to the cost of building a new home⁴).
- 6.4 As these viability measures stem from general economic inflation and regulatory changes, they are not simply cyclical changes or short-term volatility whose impact we can expect to dissipate over the plan period. Rather, they are entrenched and structural. It is therefore critical that the future viability assessment takes into account the current market challenges and provides a robust basis for underpinning the affordable housing and any

² Financial Times (<https://www.ft.com/content/c4e45f2a-593f-445a-bd3b-66df91465bb7>)

³ The Housing Forum, The Cost of Building a House (<https://housingforum.org.uk/reports/key-publications/the-cost-of-building-a-house/>)

⁴ Home Builders Federation, The Viability Crunch (<https://www.hbf.co.uk/research-insight/viability-crunch/>)

other policy requirements – and which may require less costly policy requirements compared to the current local plan. We reserve the right to comment further once the Council publishes and consults on the final assessment.