



Response to Consultation on the Cheshire East Local Plan Scoping Consultation

On behalf of Bruntwood MTL Limited

September 2026

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1 INTRODUCTION

- 1.1 These representations have been prepared by Asteer Planning LLP (“Asteer”), on behalf of Bruntwood MTL Limited (“Bruntwood”), in response to the Cheshire East Council (“CEC” or “the Council”) Local Plan Scoping Consultation.
- 1.2 Bruntwood supports the preparation of a new Local Plan for Cheshire East, recognising the importance of having an up-to-date planning framework capable of responding effectively to the Borough’s future needs. These representations respond to the relevant matters identified within the Scoping Consultation. In particular, they seek to assist the Council in developing an appropriate spatial strategy and establishing a robust approach to the identification and allocation of land through the emerging Local Plan.
- 1.3 Bruntwood’s representations are principally focused on Chapter 5, “The Scope of the New Local Plan”, and address the following matters:
- The Local Plan Period;
 - Vision and Objectives;
 - Planning for Growth;
 - Housing;
 - Climate and Sustainability; and
 - The Evidence Base.
- 1.4 The comments have been informed by the relevant national planning policy and guidance, including:
- The National Planning Policy Framework (“NPPF”), published on 17th August 2026; and
 - Planning Practice Guidance (“PPG”) on Plan-Making, last updated 27th November 2025.
- 1.5 Bruntwood acknowledges that the current Scoping Consultation focuses on the scope and content of the emerging Local Plan rather than the consideration of individual sites. However, for context, Bruntwood’s comments are made in in the context of their estate

at Booths Park, to the southeast of Knutsford, which has been submitted to previous Call for Sites consultations, which should be considered as the spatial strategy and approach to land allocations is progressed.

- 1.6 Bruntwood would welcome ongoing engagement with the Council as the Scoping Consultation responses are considered and the preparation of a new Local Plan is progressed.

2 LOCAL PLAN PERIOD

- 2.1 The Scoping Consultation sets out that the emerging Local Plan period covers up to 31st March 2045, which is a 15 year period (with a modest allowance) based on the anticipated adoption date of March 2029.
- 2.2 Bruntwood's response to the proposed Local Plan period is that it should, as a minimum, run until 2050, to allow for a more robust and adaptable framework for addressing the Borough's longer-term development requirements. The 15-year Local Plan period meets the minimum requirement set out in the PPG and NPPF, however it is recognised in the NPPF that *"Local plans can cover a longer time period where this would, for example, help support the delivery of longer-term infrastructure or strategic development"* (Policy PM2 (1) (b)).
- 2.3 Therefore, Bruntwood considers that a longer plan period would provide for a more appropriate and resilient framework for the Borough's longer-term growth, and allow for a reasonable degree of contingency for any slippage in the plan-making, examination or adoption process. Given the inherently long-term nature of strategic planning and the significant lead-in times associated with the delivery of housing, infrastructure and other strategic development, a longer plan period would enable CEC to take a more proactive and genuinely long-term approach to meeting the Borough's development needs.
- 2.4 Furthermore, a longer plan would also assist in maintaining a robust pipeline of deliverable sites which is particularly important where larger strategic sites may take several years to negotiate the planning, infrastructure and delivery stages; and where delivery rates may fluctuate over the course of the plan period. Providing for growth to 2050 would reduce the risk of the Council failing to be able to provide an adequate supply of land for housing and employment uses during the plan period, and would provide greater certainty to landowners, developers, infrastructure providers and the local community.

3 CREATING A VISION AND OBJECTIVES

- 3.1 Bruntwood considers that the emerging Local Plan vision should provide a clear, positive and ambitious framework for how CEC will develop during and beyond the plan period. The new NPPF expressly requires the vision to have particular regard to meeting the identified development needs of the area in a sustainable manner (Policy PM2 (1)(a)(iv)). It also requires the vision to articulate how the area should change over the plan period, set aspirational aims and objectives which are underpinned by a realistic appreciation of what the plan can genuinely shape and deliver, and reflect longer-term expectations beyond the plan period where appropriate, including for large-scale development proposals.
- 3.2 In this context, Bruntwood considers that a fundamental objective of the Plan should be to ensure that Cheshire East meets its identified housing requirement in full, in accordance with the NPPF. The vision should therefore clearly recognise the scale of housing growth required and establish an ambitious and proactive approach to identifying and delivering the land necessary to meet that requirement. This is particularly important given that Cheshire East does not have sufficient urban capacity to accommodate its housing requirement and, consequently, the Plan will need to consider a range of locations and sources of land to ensure that sufficient housing can be delivered.
- 3.3 The Plan's vision and objectives should therefore promote the efficient and sustainable use of land as a key principle of the spatial strategy. In the first instance, this should involve maximising opportunities within existing urban areas and on previously developed land, including through the review of existing allocations and the identification of vacant, underutilised and brownfield sites, both within and on the edge of the Boroughs Principal Towns and Key Service Centres ("KSCs"), such as Knutsford. The objectives should recognise the potential contribution of sites currently in employment use, where there is no reasonable prospect of their existing allocation or use being implemented or continued, to be identified for housing or mixed-use development. This would ensure that the Plan makes efficient use of land and prioritises the reuse of previously developed sites and allocations.
- 3.4 The vision and objectives should recognise the important role that suitable previously developed land within the Green Belt can play in meeting Cheshire East's development

needs. The redevelopment and regeneration of such sites can provide sustainable and deliverable opportunities for new housing and other uses, whilst making efficient use of previously developed land and helping to reduce pressure for development on greenfield sites. Bruntwood considers that the redevelopment of appropriate previously developed Green Belt sites, such as Booths Park, should be identified as a clear objective of the Plan's spatial strategy.

- 3.5 The vision should nevertheless be realistic about the scale of growth required and recognise that, even after making best use of urban capacity and suitable previously developed land, greenfield and edge-of-settlement development will be necessary to meet Cheshire East's housing requirement. The Plan's objectives should therefore support the identification of sustainable locations for such growth. In considering the potential sources of greenfield land, safeguarded land should form an important starting point, given its previous identification through the planning process as land with potential to accommodate development in the future.
- 3.6 Given the simultaneous preparation of the Local Plan and Cheshire and Warrington Spatial Development Strategy ("SDS"), CEC should ensure that its Plan is proactive and complementary to the emerging sub-regional SDS. In this context, CEC should have a clear vision which identifies *"broad locations for growth and regeneration"* that have *"the potential for significant new homes, jobs and other development"* which will be identified through the SDS as required by the NPPF (Policy PM1b).
- 3.7 Overall, Bruntwood considers that the vision and objectives should be ambitious, proactive and focussed on delivery, providing a positive response to the scale of growth facing Cheshire East and ensuring that the Plan maximises the opportunities arising from that growth.

4 PLANNING FOR GROWTH

Identifying and Assessing Sites

- 4.1 Bruntwood supports the Council's intention to undertake a comprehensive and transparent assessment of potential development sites to ensure that sufficient land is identified to meet Cheshire East's housing and employment requirements. Given the scale of the housing requirement and the limitations of the existing urban capacity, the site assessment process should be proactive and sufficiently flexible to identify and maximise opportunities across the full range of potential sources of housing land. In particular, the methodology should ensure that previously developed land, Grey Belt land and employment sites which are no longer suitable or required for employment use are identified and assessed in the context of the Borough's acute housing needs.
- 4.2 The emerging land availability assessment methodology should assess sites against the established principles of suitability, availability and deliverability, alongside their contribution to the Council's wider spatial strategy and sustainability objectives. The methodology should not apply overly restrictive criteria at an early stage which could prevent otherwise suitable and deliverable opportunities from being properly considered. In particular, the assessment should recognise the potential for land to be reused or redeveloped where this would make a positive contribution to meeting development needs and the Plan's wider regeneration objectives. In particular, Bruntwood considers that the following matters should inform the assessment and subsequent site selection process:

Previously Developed Land

- 4.3 The methodology should place particular emphasis on identifying previously developed land, including vacant, underutilised and previously developed sites within the Green Belt and open countryside. Such sites should be positively assessed for their potential to contribute towards meeting housing and other development needs, having regard to their location, sustainability, deliverability and the opportunities they present for regeneration and the efficient use of land and existing infrastructure.

Employment Sites

- 4.4 The assessment process should include a comprehensive review of existing employment allocations and sites. Not all land currently in employment use will

necessarily remain suitable, viable or required for employment purposes over the plan period. The methodology should therefore consider the suitability and market attractiveness of employment sites, their existing and likely future employment function, and the reasonable prospects of a planning application being made and implemented for employment development. Where there is no reasonable prospect of continued employment use, the potential for the site to meet the Borough's identified needs (such as housing) should be considered.

Green belt and grey belt

- 4.5 Where sites are located within the Green Belt, the assessment should be undertaken in accordance with the NPPF (Policies GB1 to GB8 and Annex E) and in particular, should clearly identify land that falls within the definition of Grey Belt (with a focus on previously developed land, which by definition is Grey Belt) to ensure that such land is properly considered through the wider site selection process. Given the scale of CEC's housing requirement and current housing land supply position, it is considered that a significant quantum of grey belt land will need to be identified.

Location and relationship to settlements

- 4.6 The location of a site should remain a fundamental consideration, with appropriate weight given to sites that are well related to existing settlements and which can form logical extensions to established urban areas or make effective use of existing settlements, services, facilities, employment opportunities and infrastructure. This should include consideration of previously developed and Grey Belt sites which, notwithstanding their location outside existing settlement boundaries, have a strong functional and spatial relationship with existing settlements.

Sustainability and accessibility

- 4.7 Site selection should have regard to the principles of sustainable development and should consider the extent to which sites can be served by, and provide convenient access to public transport, walking and cycling networks. The availability of local services, facilities and employment opportunities should also be considered; including where existing services could be improved.
- 4.8 Sustainability should be considered in the round and should not be assessed solely by reference to a site's current relationship with settlement boundaries. The potential for

development to improve connectivity, support existing services and facilities, remediate or regenerate previously developed land and make efficient use of existing infrastructure should all be relevant considerations.

Comparative Assessment and Flexibility

- 4.9 Bruntwood considers it important that the methodology allows sites to be considered comparatively, rather than relying solely on an absolute scoring system. A site with some constraints may represent a more sustainable and deliverable development opportunity than an unconstrained site in a less accessible location. The Council should therefore retain sufficient flexibility to apply professional judgement and consider the overall planning merits of individual sites, including the benefits associated with the redevelopment of previously developed land, Grey Belt land and employment sites which are no longer suitable for their existing use.
- 4.10 The Council should also fully consider information submitted by site promoters which demonstrates how identified constraints can be overcome, how infrastructure can be provided and how sites can contribute towards the delivery of the Plan's objectives. The assessment process should not therefore treat the presence of a constraint as an automatic reason for excluding a site where there is credible evidence that the constraint can be addressed.

Maintaining a Supply of Deliverable Sites

- 4.11 The assessment should recognise the need for a robust and continuous supply of land throughout the plan period. This is particularly important given the varying delivery rates associated with different types and scales of site. Sites should therefore be assessed against both their ability to contribute towards short- and medium-term requirements and their potential role in meeting longer-term growth needs.
- 4.12 The Council should ensure that the final portfolio of sites is sufficiently diverse to provide resilience in the housing land supply. This should include a mix of urban sites, redevelopment opportunities, previously developed land within the Green Belt and open countryside, Grey Belt sites, suitable former employment sites and, where necessary, sustainable greenfield and edge-of-settlement locations.

- 4.13 Finally, Bruntwood supports the Council's intention to provide further opportunities to submit new sites and update existing submissions as the Plan progresses. The methodology should be published in sufficient detail to enable landowners and promoters to understand how sites have been assessed and, where appropriate, to provide additional evidence to address identified constraints. This will help ensure that the eventual site allocation process is transparent, evidence-led and capable of identifying the most sustainable and deliverable locations for growth, whilst maximising opportunities to reuse previously developed land and meet development needs through Grey Belt and other appropriate sites before relying more heavily on the release of previously undeveloped land.

Green Belt Review

- 4.14 Bruntwood welcomes CEC's intention to undertake a comprehensive review of the Green Belt across the Borough. Given the level of development that the new Local Plan will need to accommodate, it is essential that the assessment provides a robust and impartial understanding of the role and function of Green Belt land, including the identification of areas that meet the NPPF definition of Grey Belt (Annex 2).
- 4.15 The outcomes of the Green Belt review should be considered alongside the Council's housing and employment needs, the emerging spatial strategy and the sustainability and deliverability of individual sites. This should include consideration of the relationship between potential Green Belt release and existing settlements, accessibility to services and facilities, transport connections and opportunities to create sustainable patterns of development.

Settlement Hierarchy

- 4.16 Bruntwood supports CEC's intention to collect evidence to inform a review of the settlement hierarchy in the new plan. The settlement hierarchy should be based on the current and future role and function of settlements, with consideration of the range, scale and accessibility of services and facilities, proximity to employment opportunities, public transport connectivity, relationship with surrounding settlements, housing and employment markets and the potential for settlements to accommodate sustainable growth.

- 4.17 Bruntwood supports an approach whereby the Principal Towns and Key Service Centres continue to accommodate a large proportion of the Borough's future growth, reflecting their established role, range of services and facilities, accessibility and ability to support sustainable patterns of development.
- 4.18 Bruntwood supports CEC intention to prepare an evidence-led settlement hierarchy which recognises future potential, and which can provide a framework for directing growth towards settlements where development can be accommodated sustainably and can contribute positively to their long-term vitality and resilience.

Spatial Distribution

- 4.19 Bruntwood supports a spatial strategy that considers a range of locations and development forms to achieve a balanced and sustainable distribution of growth across the Borough. This should be informed by housing and employment needs, infrastructure capacity, settlement function, accessibility, commuting patterns and the sustainability of existing settlements.
- 4.20 A key spatial focus for growth in CEC should continue to be the Borough's Principal Towns and KSCs, which have the existing infrastructure, services and facilities to support new development; and the capacity to support additional population growth. The spatial strategy and distribution of growth across the Borough should fully recognise the potential for growth in these key settlements.
- 4.21 Overall, growth should be directed to locations that provide sustainable access to jobs, services and facilities, support existing settlements, make effective use of infrastructure and maximise opportunities for the reuse of previously developed and under-utilised land.

5 HOUSING

Housing Need

- 5.1 The most up-to-date Local Housing Need figure for CEC is 2,424 dwellings per annum (“dpa”) which is significantly higher than the adopted figure of 1,800 dpa (and more than double the previous Local Housing Need of 977 dpa). Therefore, the emerging Local Plan will have to accommodate a significantly increased housing requirement whilst ensuring that sufficient deliverable sites are allocated to maintain a robust housing land supply and delivery throughout the plan period.
- 5.2 The importance of identifying a robust supply of housing is reinforced by the Council's Housing Monitoring Update which confirms that CEC cannot currently demonstrate a five year housing land supply, with a 3.3 year supply. This highlights the need for the emerging Local Plan to provide a resilient and flexible portfolio of allocations capable of maintaining a demonstrable five-year housing land supply on adoption and throughout the lifetime of the Plan. Doing so will provide greater certainty for communities, developers and infrastructure providers, whilst reducing; the reliance on, and effects from, the unplanned nature of speculative planning applications arising from an insufficient supply of housing land.
- 5.3 Overall, Bruntwood supports CEC undertaking an up-to-date Housing Needs Assessment to identify the key housing issues that the Local Plan will need to address. The Plan should then take a positive and flexible approach to meeting identified housing needs through a balanced portfolio of sites, maximising opportunities to reuse vacant, under-utilised and previously developed land, alongside strategic urban extensions and other sustainable greenfield sites. This would support the efficient use of existing settlements and infrastructure while ensuring a resilient and deliverable supply of housing throughout the Plan period.

Affordable Housing

- 5.4 Bruntwood supports that CEC have identified Affordable Housing as a principal issue for consideration through the new Local Plan. However, Bruntwood considers that this is intrinsically linked to the point above regarding meeting overall housing needs. Affordable housing is principally delivered through market-led residential development,

so the Plan will need to allocate a sufficient number of viable housing sites capable of delivering affordable homes alongside market housing.

Housing Mix and Standards

- 5.5 Bruntwood supports the opportunity identified by CEC to review and update the housing mix policies within the emerging Local Plan. Bruntwood considers that a flexible approach should be implemented, which enables development to respond to local needs rather than having a broad brush approach across the Borough. A flexible policy approach should reflect local circumstances across the borough, respond to market demands, and remain flexible to changes such as demographic change throughout the Plan period.

6 CLIMATE CHANGE ADAPTATION

- 6.1 Bruntwood supports the Plan's objective of ensuring that new development is resilient to the impacts of climate change. In this context, the spatial strategy has an important role to play in supporting sustainable patterns of development by prioritising the effective reuse of land and existing assets. The Plan should therefore maximise opportunities to bring previously developed and under-utilised land back into productive use, particularly where development can make effective use of established infrastructure, services and sustainable transport connections.
- 6.2 This should include a proactive approach to the review and redevelopment of existing employment sites, particularly where sites are vacant, under-utilised or no longer suitable or viable for their existing employment use. Where there are no reasonable prospects of the existing use being retained or the allocation being implemented, the Plan should consider whether such sites could appropriately be reallocated for housing or mixed-use development. Bringing such sites forward can help to regenerate previously developed land, reduce the need to develop previously undeveloped land and make better use of existing infrastructure, thereby contributing to the Plan's wider sustainable development objectives.
- 6.3 Bruntwood considers that the reuse of previously developed and under-utilised land should therefore be recognised as a key component of the Plan's approach to climate change adaptation and sustainable development. The spatial strategy should seek to maximise these opportunities alongside the identification of other sustainable locations for growth, recognising that the redevelopment and regeneration of existing sites can provide resilient, deliverable development opportunities while helping to reduce pressure on undeveloped land and supporting the long-term sustainability of Cheshire East's settlements.

7 EVIDENCE BASE

- 7.1 Bruntwood supports the preparation and updating of the evidence base identified by CEC and considers that the emerging evidence should provide a robust basis for determining the most sustainable and deliverable locations for development. In particular, the evidence base should take a comprehensive approach to assessing the capacity of existing urban areas and previously developed land, including vacant and under-utilised sites and existing employment sites.
- 7.2 The Economic Development Needs Assessment and Employment Land Review should consider not only the quantitative supply of employment land, but also the suitability, availability, market attractiveness and deliverability of individual sites. This should include consideration of sites that are vacant, under-utilised or no longer suitable for their existing employment use, and whether there are reasonable prospects of the existing allocation being implemented. Where this is not the case, the evidence should consider whether such sites could appropriately be released or reallocated for housing or mixed-use development. Similarly, the Land Availability Assessment should ensure that previously developed and under-utilised land is fully identified and assessed as part of the Plan's supply of potential development sites.
- 7.3 The evidence base should therefore provide a clear understanding of the opportunities and constraints associated with the reuse and redevelopment of existing sites, including their potential contribution to meeting housing and employment needs. This will help ensure that the spatial strategy is based on a comprehensive assessment of available opportunities and supports the Plan's wider objectives for sustainable development, regeneration, climate change adaptation and the efficient use of land.
- 7.4 Bruntwood also notes that a Green Belt Review does not appear within the list of proposed evidence. However, given the commitment in the Green Belt section of the Scoping Consultation to undertake a borough-wide Green Belt assessment, Bruntwood assumes that this has been omitted from the list in error. The assessment should ensure that previously developed land within the Green Belt is properly identified and considered, alongside a comprehensive assessment of land which may constitute Grey Belt. This should be undertaken in accordance with the definition and methodology set out in the NPPF, including Annex E, and the PPG.

8 SUMMARY AND CONCLUSIONS

- 8.1 The new Local Plan represents an important opportunity to shape the long-term future of Cheshire East and provide a clear and sustainable framework for meeting the Borough's housing, employment and infrastructure needs. Bruntwood considers that the Plan should adopt a positive and flexible approach to growth, ensuring that sufficient development is planned for while making best use of existing settlements, infrastructure and land resources.
- 8.2 A key component of the spatial strategy should be to maximise opportunities to reuse of vacant, under-utilised and previously developed land, as well as grey belt land on the edge of the Borough's Principal Towns and KSCs. This should include a robust review of existing employment sites, particularly where they are vacant, under-used or no longer suitable or viable for their existing employment function, and consideration of whether such sites could appropriately be reallocated for housing or mixed-use development. The Plan should also fully assess suitable previously developed land within the Green Belt and identify land which may constitute Grey Belt, recognising the potential contribution of these sites to meeting development needs.
- 8.3 Bruntwood considers that, notwithstanding the opportunities within the urban area, previously developed land, the Plan will need to identify a range of sustainable and deliverable locations for growth, particularly in the Borough's Principal Towns and KSCs, including appropriate edge-of-settlement and greenfield opportunities, to ensure housing and other development needs can be met over the plan period. The evidence base and spatial strategy should therefore provide a comprehensive assessment of all available opportunities and constraints and adopt a flexible approach which can respond to changing market conditions and delivery circumstances.
- 8.4 Bruntwood welcomes the opportunity to engage with CEC as the evidence base and emerging Local Plan develop, including in relation to the specific sites and opportunities it is promoting. Further discussions can be facilitated by Asteer.