AVISON YOUNG

24th August 2026

Strategic Planning Team
Cheshire East Council
Delamere House
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Sent via email: localplan@cheshireeast.gov.uk

Dear Sir/Madam,

Regulation 20 Consultation: The New Cheshire East Local Plan

Thank you for the opportunity to submit representations to the Regulation 20 Consultation of the new Cheshire East Local Plan. Avison Young has been instructed by our clients, Elderloch Ltd (part of MCR Property Group), who have a land interest at Deandale Equestrian Centre which sits immediately west of the defined settlement boundary in Handforth.

As you will be aware, our client has previously submitted representations to the Call for Sites exercise in 2024 and 2026, and we respectfully request that these representations are read in conjunction with previous submissions. We also kindly request that these representations are considered in the next stages of the Local Plan preparation.

We understand that the Cheshire East Local Plan is at an early stage of preparation and that the Council is currently seeking views on matters relevant to the preparation of the Local Plan, including what the plan should contain and how the authority should engage during the plan preparation process.

These representations therefore provide comments on whether the matters identified in the consultation document are broadly appropriate, specifically in response to Sections 3 (Context for the New Local Plan) and Section 5 (Scope of the New Local Plan). It is noted that Avison Young reserve the right to provide further representations to future stages of the Local Plan.

Section 3: Context of the New Local Plan

Increase in Housing Requirements

Paragraph 3.5 states that "*Cheshire East's housing need has now increased to 2,530 homes per year".* This text goes on to acknowledge that this represents a 41% increase compared to the current Local Plan housing requirements.

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The Councils most recent Housing Monitoring Update (base date 31st March 2025), published in April 2026, reports a 3.3 year supply of housing. It is therefore clear that Cheshire East Council are going to need to identify additional suitable, available and deliverable housing sites across the Borough as part of the emerging Local Plan, in order to boost their supply and demonstrate a robust five year supply of housing. This will require the identification of a broad range of sites including small and medium sites, alongside larger strategic sites, to ensure that a suitable mix of house types, sizes and tenures are provided to meet identified housing need and deliver an appropriate level of affordable housing to help create balanced and sustainable communities.

Elderloch support this approach to meeting the Borough's housing needs and ensuring that the emerging Local Plan is positive, appropriate, effective and consistent with national policy, which are the four fundamental requirements of a 'sound' Development Plan, in accordance with National Planning Policy Framework (NPPF) Policy PM15.

Cheshire East Council will be aware that an overreliance on large strategic sites can present significant challenges for maintaining a consistent supply of deliverable housing sites. This has been recently demonstrated with Strategic Site allocation LPS33: North Cheshire Growth Village, Handforth East, which was allocated in the adopted 2017 Local Plan Strategy to deliver 1,500 homes during the plan period until 2030. However, there have been significant delays, owed to coordinating complicated planning applications, securing funding and delivering necessary infrastructure, and development on site has only commenced this year which is significantly slower than originally projected.

In the context of the prolonged delays to delivery at strategic sites, together with the significant increases in the housing targets, it is clear that Cheshire East Council is going to have to positively plan for growth and identify a range of additional sites to accommodate future development needs. A balanced strategy that incorporates both larger strategic sites and appropriately scaled, deliverable edge-of-settlement Green Belt sites, like Deandale Equestrian Centre, which is a highly sustainable and logical option for Green Belt release, will provide greater flexibility, resilience and certainty in meeting future housing needs.

Section 5: Scope of the New Local Plan

Planning For Growth

Paragraph 5.5 – 5.7 of the Local Plan Scoping document acknowledge that sufficient land needs to be identified, including identifying future housing land informed by evidence on housing need. Elderloch support the planning for growth approach to help significantly boost economic opportunities and diversify housing provision.

Identifying and Assessing Sites – Housing

Paragraph 5.11 briefly outlines the methodology for identifying future development sites; the approach for which is generally welcomed. Clearly this exercise will need to be transparent and evidence led. As part of the land availability assessment methodology, Elderloch believe the following criteria should be included:

- Whether the site is sustainably located;

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- Potential site constraints;
- The relationship to the existing settlement boundaries;
- Whether the land is considered previously developed; and
- Any conclusions from the latest borough wide Green Belt assessment which must be completed in accordance with the latest national policy guidance.
- The availability of the site and realistic prospects/ timescales for delivery;
- The current surrounding development context, including whether identified constraints can reasonably be addressed through scheme design and mitigation.

Elderloch reserves the right to comment further on the site selection methodology at the next stage of the Local Plan consultation.

Green Belt

In terms of reviewing the Green Belt boundaries, Elderloch agree that as set out in paragraph 5.16 and in accordance with national policy, amendments should only be sought in exceptional circumstances. Given the significant increase in housing need and the Council's current housing land supply position, it is clear the Council will need to robustly test whether its development needs can be met without altering Green Belt boundaries. Where those needs cannot be met without the release of Green Belt land, exceptional circumstances would exist to justify Green Belt boundary changes in accordance with national policy.

While the Council should continue to prioritise urban and brownfield sites in line with national policy, the limited development capacity within the Borough's existing settlements and urban areas means that additional land will be required to meet future housing demand. As a result, the release of carefully selected Green Belt sites in sustainable locations should be considered as part of the Local Plan process to avoid a significant undersupply of housing land, as no better alternative sites exist.

Smaller Green Belt sites on the edge of settlements, such as Deandale Equestrian Centre, can provide a particularly effective solution. Small to medium sized sites are more often than not less reliant on major infrastructure investment and therefore can be delivered more quickly, thus making an important contribution to maintaining the Borough's five year housing land supply. As such, the allocation of small and medium size sites should form an important component of the Council's Local Plan spatial strategy, and should make up a significant proportion of the housing land ultimately earmarked for future residential development under the emerging Plan.

To support this approach, the Council should undertake a comprehensive Green Belt review to identify whether further Green Belt sites could be released without causing significant harm to the purposes of the Green Belt. This would not only help to meet objectively assessed housing needs but also allow the allocation of the most suitable and sustainable sites.

Elderloch therefore supports the Council's approach to review and, where appropriate, amend Green Belt boundaries to ensure the Local Plan can meet the Borough's housing and development requirements.

Moreover, in the context that Green Belt release is likely to be necessary, Elderloch supports the policy direction at paragraph 5.17 which notes that densities will be optimised in the correct locations. This is clearly consistent with national policy which seeks to ensure efficient use of land. However, it is noted that this policy should also allow for sufficient flexibility to enable developments to reflect the layout and character of surrounding areas.

Paragraph 5.18 notes that a borough wide Green Belt assessment will be undertaken to identify grey belt land and inform future decisions on potential Green Belt release. Elderloch supports the review, providing it is done at an appropriately granular scale where each site can be considered thoroughly on its own merits, and in a manner that fully reflects the latest national policy guidance in relation to Green Belt/ Grey Belt land.

For example, if the Green Belt Review only considers strategic scale development parcels comprising large swathes of land under numerous different ownerships, this could contain a range of sites which each contribute to the Green Belt purposes differently. The assessment should therefore be capable of considering sites or sub-parcels on their own merits where appropriate, including having regard to changes in settlement form and surrounding development since earlier Green Belt studies were undertaken. This is particularly important where historic assessments have considered broad strategic parcels which may contain individual areas that perform differently against the individual purposes of the Green Belt.

The assessment should also properly identify previously developed land within the Green Belt and ensure that historic strategic parcel conclusions are not treated as final, where the current site-specific context has changed. This will ensure the evidence is sufficiently robust to inform any subsequent decisions on Green Belt boundary changes and site selection.

As such, Elderloch maintain that the Green Belt assessment must be undertaken in a more granular manner, so that the conclusions of the study are robust and directly inform any proposals to alter the Green Belt boundaries to accommodate future development needs.

Settlement Hierarchy

Paragraph 5.20 outlines the four tier settlement hierarchy and strategy for development, noting Handforth as a 'key service centre'. Elderloch support this identification for Handforth and agree that growth should be directed to sustainable key service centres like Handforth as they provide a range of key services and amenities to support future population growth.

Spatial Distribution

Paragraphs 5.24–5.26 recognise that the new Local Plan will need to establish an appropriate spatial distribution of development and that, given the scale of growth likely to be required, this may include opportunities for sustainable edge-of-settlement growth. Elderloch supports this approach.

The distribution of growth should be informed by a balanced assessment of sustainability, housing need, accessibility to services and employment, infrastructure capacity, land availability, market attractiveness and deliverability, rather than applying an overly rigid distribution based solely on settlement size or historic patterns of growth.

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In this context, sustainable Key Service Centres such as Handforth should continue to play an appropriate role in accommodating future housing growth, including through suitable and deliverable edge-of-settlement sites where necessary.

Development in the Countryside

Paragraph 5.29 of the scoping document addresses the overall approach to development outside of settlements. It is our position that no further policies are needed in this respect as national policies are already prescriptive and as such, the Local Plan should avoid additional local policy tests which are not consistent with national policies, and to avoid any duplication or cutting across the NPPF.

Affordable Housing

Paragraph 5.35 of the Scoping document states that the new Local Plan "*will need to establish affordable housing requirements, including the overall number of homes to be provided and the tenure mix, informed by evidence on housing needs and development viability".*

Elderloch fully supports the principle of improving affordability across Cheshire East and agree that a Housing Needs Assessment will be required to inform the Local Plan, and ensure any future policies in this regard are appropriate.

It is noted that there is currently no up to date evidence on affordable housing need in Cheshire East, so undertaking this work will, in turn, enable the policy to be informed and assist with the strategic policy direction. That being said, again, it will be important for any forthcoming policy to allow for flexibility and site specific circumstance such as viability to be taken into account.

Engaging with Site Promoters

Finally, paragraph 6.52 acknowledges that further call for sites exercises will be undertaken throughout the plan making process. Elderloch support this approach and welcome further opportunities to engage with the emerging Local Plan. We would also advocate for, and request, the opportunity for developers and landowners to be able to comment on the Council's findings/ conclusions from its site assessment work, including a meaningful opportunity to review published site assessments, correct any factual inaccuracies and provide updated evidence where necessary before conclusions become embedded at later stages of the Local Plan.

Summary

These representations have highlighted the key issues that the Cheshire East Local Plan should address in order to ensure that the Local Plan is positive, appropriate, effective and consistent with national policy, in accordance with the NPPF policies on plan-making.

It is clear that the new Local Plan will need to set out an appropriate and justifiable methodology for the site selection process, including a robust assessment of whether exceptional circumstances exist for Green Belt boundary changes, in order to identify additional land required to meet future development needs and maintain a five year supply of housing throughout the plan period.

We would be grateful if you could confirm safe receipt of this letter. Should you require further information or wish to discuss then please don't hesitate to contact me.

AVISON YOUNG

Yours sincerely

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