ASTEER
PLANNING

Response to Consultation on the Cheshire East Local Plan Scoping Consultation

On behalf of Clowes Developments North West Limited

August 2026

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1 INTRODUCTION

1.1 Thank you for providing an opportunity to provide comments on the emerging Cheshire East Council (herein referred to as "CEC" or "the Council") Local Plan Scoping Consultation. The Scoping Consultation comprises the first formal stage of engagement in the preparation of a new Local Plan for CEC; it seeks views on the scope and future content of the emerging Local Plan.

1.2 These representations have been prepared by Asteer Planning LLP ("Asteer") on behalf of Clowes Developments North West Limited ("Clowes") in response to the Scoping Consultation and to inform the spatial strategy and approach to development and land allocations within the emerging Local Plan.

1.3 Clowes' comments focus on Chapter 5: *"The Scope of the New Local Plan"*, and specifically provide comments on: the Local Plan Period; Vision and Objectives; Planning for Growth; Housing; Heritage; and the Evidence Base. Clowes notes the other content of the Scoping Consultation relating to: Transport and Infrastructure; Health and Wellbeing; Climate Change Adaptation; Recreation and Community Facilities; and Design, and reserves the right to comment on the draft policies relating to these considerations, which will be published as part of the successive stages of consultation on the Local Plan.

1.4 Clowes is one of the UK's largest and strongest privately-owned property investment and development organisations, and its guiding aim is to build a lasting legacy of strong, sustainable places that will enable future generations to prosper. Clowes has been successfully delivering commercial development at Viking Way, Congleton, which sits within the LPS 27 'Congleton Business Park Extension' allocation and was the subject of outline planning permission for mixed-use development (LPA reference: 19/5596C), for the past few years, with development including an Aldi, Starbucks, Greggs and KFC, as well as a builders' merchant.

1.5 Phase 5, Viking Way, forms the final phase of development within the site that was the subject of the outline planning permission (LPA reference: 19/5596C). Although the Phase 5 site was identified for employment development (Use Classes B1 (now E)/B2/B8) under the outline planning permission, there is a severe gradient rising from west to east on the site, which makes the previously consented employment use

unfeasible. Therefore, Clowes has explored alternative land uses at Phase 5, Viking Way, which would still be employment generating, but which could be designed around the significant level changes on site.

1.6 At the time of writing Clowes is undertaking a comprehensive marketing exercise at Phase 5, Viking Way. However, without predetermining the outcome of the ongoing marketing exercise and on the basis that there is an identified need for Extra Care housing in the Borough which the emerging Local Plan will address, Clowes considers that there is no reasonable prospect of the site coming forward for employment use and, thus, alternative uses, such as Extra Care housing, should be considered. It is intended for the Extra Care development to be operated by Plus Dane Housing; a prominent housing association operating in the North West, committed to delivering quality homes, excellent services, and vibrant, inclusive communities.

1.7 It is acknowledged that the Scoping Consultation is not site-specific, and that the Council is not inviting call for sites submissions as part of this consultation. However, Clowes is committed to demonstrating the deliverability of Phase 5, Viking Way, for Extra Care housing and would welcome ongoing engagement with the Council as the Scoping Consultation responses are considered and the preparation of the new Local Plan is progressed.

2 SCOPING CONSULTATION RESPONSES

2.1 Clowes is fully supportive of the preparation of a new Local Plan for Cheshire East, which is necessary to be able to plan for the future needs of the Borough. Specifically, Clowes seeks to ensure that the new Local Plan provides for homes, including specialist forms of accommodation (such as Extra Care housing), required to meet the needs of Cheshire East during the next Plan period.

2.2 This section provides high level comments on the 'Scope of the New Local Plan', taking into account:

- The NPPF, published on 17th August 2026; and,
- Planning Practice Guidance ("PPG") on Plan-Making, last updated 27th November 2025.

Local Plan Period

2.3 CEC's new Local Plan is proposed to cover the period to 31st March 2045, which allows for a 15 year period with a modest buffer based on adoption of the new Local Plan in March 2029. Whilst the proposed Plan period is in line with PPG for plan making and the new NPPF Policy PM2(1)(b), which are framed as a minimum requirement, rather than a maximum. The NPPF recognises 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"* (NPPF Policy PM2 (1)(b)).

2.4 Clowes considers that the Plan period should extend to 2050 as a minimum. This would allow for a reasonable degree of contingency should there be any slippage in the plan-making, examination or adoption process, and would, thus, provide a more appropriate and resilient framework. A longer Plan period would enable CEC to take a proactive and long-term approach to meeting the Borough's future development needs, which is of particular importance given the long-term nature of strategic planning and the lead-in times associated with the delivery of housing, infrastructure and other strategic development. Furthermore, it would provide greater certainty for the identification and delivery of development sites and the infrastructure required to support them, and would also assist in maintaining a robust pipeline of deliverable sites. Consequently, extending the Plan period 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.

Creating a Vision and Objectives

2.5 The new NPPF expressly requires the vision to have particular regard to meeting the identified development needs of the area in a sustainable manner (NPPF 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. Clowes considers that the vision for the new Local Plan should provide a clear, positive and ambitious framework for how CEC will develop over the Plan period and beyond. The vision should place a clear emphasis on positively planning for and meeting CEC's identified housing, employment and infrastructure needs. This is particularly important given that the emerging Local Plan is being prepared alongside the Cheshire and Warrington Spatial Development Strategy ("SDS"), which should *"set a positive vision for future growth and change at a sub-regional scale and provide a clear spatial framework for investment and growth, including for new housing"* (NPPF Policy PM1(1)).

2.6 Further to the above, the vision for the emerging Local Plan should, in accordance with the NPPF, make it clear that there is now a permanent presumption in favour of suitably located development, and should emphasise the importance of directing growth to well-connected sites that are within existing settlements.

Planning for Growth

Identifying and Assessing Sites

2.7 Clowes considers that the site identification and selection process should be informed by a clear, transparent and robust set of criteria, applied consistently and objectively to all sites and potential growth locations. The methodology should provide sufficient flexibility to recognise the different characteristics and opportunities presented by individual sites and settlements.

2.8 Clowes considers that the assessment criteria should include: the accessibility and connectivity of the site, including its access to current and planned services and facilities; its location within / relationship with the existing settlements; the potential to create sustainable patterns of development; deliverability; physical and environmental constraints; and the social, environmental and economic benefits.

2.9 As part of the new Local Plan's identification and assessment of sites for development, the urban capacity of the Borough should be considered prior to sites on the edge/outside of settlements. Owing to the extent of Cheshire East's housing requirements, sites outside the urban area will be required, however, deliverable sites within the urban area and on allocated sites, such as Phase 5, Viking Way, should be considered in the first instance.

2.10 In relation to the principle of development within settlements, NPPF Policy S4 allows for alternative land uses on allocated or safeguarded sites where *"there is no reasonable prospect of an application coming forward for the allocated use, or there is evidence that the safeguarding is no longer appropriate."* As detailed earlier in these representations, the delivery of employment development at Phase 5, Viking Way, is unfeasible owing to the severe gradient across the site. Therefore, Clowes considers that there is no reasonable prospect of the site coming forward for employment use and, thus, alternative uses, such as Extra Care housing, should be considered.

Settlement Hierarchy

2.11 Clowes 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.

2.12 Clowes considers that Congleton should be identified as a Principal Town in the settlement hierarchy in the new Local Plan owing to the wide range of services and facilities within Congleton and its high level of accessibility.

Spatial Distribution

2.13 Clowes supports the recognition that the Local Plan will need to consider a range of locations and development forms in determining the most appropriate distribution of growth across the Borough.

2.14 Clowes considers that the spatial strategy should focus on directing a considerable proportion of growth to the settlements within the top tiers of the settlement hierarchy, within which Congleton should be identified, owing to these locations being the most sustainable for accommodating growth given their scale, range of services and facilities, employment opportunities, transport connections and existing infrastructure.

2.15 Clowes is also supportive of the Council's intention to include opportunities for densification and further development within existing settlements.

Development in Settlements

2.16 Clowes notes that the Council does not intend to repeat the national decision-making policies contained within the NPPF, but that, as part of the new Local Plan, the Council will consider whether any additional local policies are needed in accordance with the national decision-making policies.

2.17 Policy S4 of the NPPF is clear that (Asteer's emphasis in **bold**), *"development proposals within settlements* ***should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects****, when assessed against the national decision-making policies in this Framework."* Therefore, if any additional local policies relating to development in settlements are proposed in the new Local Plan, it must be ensured they are consistent with NPPF Policy S4 and do not restrict development which would otherwise be considered acceptable in the context of the NPPF.

Housing

Housing Need

2.18 The latest 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 also ensuring that sufficient deliverable sites are allocated to maintain a robust housing land supply and

delivery throughout the plan period. 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 (3.3 years' supply).

2.19 It is clear that sites will be needed outside of settlement boundaries to meet the Council's housing needs and, thus, sites in the settlement (the urban capacity) should be reviewed and considered in the first instance, particularly in the context of specialist housing for older or disabled people where it is important for residents to be able to access frequently-used services easily and safely by walking, wheeling (including mobility scooters) and by public or on-site transport services; including through facilities provided as part of the scheme (in accordance with Policy HO9 of the NPPF). It is important that housing need should address the need for specialist housing, such as Extra Care.

2.20 Overall, Clowes supports CEC's intention to undertake an up-to-date Housing Needs Assessment to identify the key housing issues that the Local Plan will need to address, and to plan positively for meeting housing needs, including for Extra Care housing.

Housing Mix and Standards

2.21 Clowes is supportive of CEC's intention to review and update the housing mix policies within the emerging Local Plan. Clowes considers that a flexible, rather than 'one-size-fits-all', approach should be implemented, which enables development to respond to local needs, including those relating to specialist forms of accommodation (such as Extra Care housing).

2.22 Further to the above, Clowes recommends that the new Local Plan should supersede and update the Cheshire East Borough Residential Design Guide SPD which was adopted in 2017.

Heritage

2.23 Clowes agrees with CEC in that (Asteer's emphasis in **bold**), *"the new Local Plan will need to **balance** the conservation and enhancement of the historic environment with the delivery of housing, employment and infrastructure"* (Paragraph 5.127 of the Scoping document). However, in undertaking this balancing exercise, it is important that the social, economic and environmental benefits that could be delivered by development are

given appropriate weight (and accord with the relevant weightings in the NPPF) when the Council is identifying allocations for development in the new Local Plan.

2.24 Policy HE2(1) explains how Development Plans can conserve the significance of World Heritage Sites, such as by:

a) *"[Identifying] opportunities for new development affecting these assets to enhance or better reveal their significance, alongside any measures needed to safeguard their importance and long-term future; and [reflecting] these in policies for site allocations and/or accompanying design guides, design codes or masterplans; and*

b) *[Including] any locally-specific policies needed to conserve the significance and Outstanding Universal Value of World Heritage Sites (including any contribution made by their setting including any buffer zone). Those policies should encourage sustainable use and take into account relevant policies and objectives in World Heritage Site management plans."*

2.25 Furthermore, despite being a decision-making, as opposed to plan-making policy, the NPPF is clear that, *"Not all elements of a World Heritage Site will necessarily contribute to its significance or Outstanding Universal Value."*

2.26 Therefore, the NPPF is clear that development affecting World Heritage Sites can be acceptable, and, thus, the allocation of housing and employment sites should not be prohibited solely because of their situation within a World Heritage Site, its buffer zone or its wider setting.

2.27 Clowes understands that the new Local Plan will specifically review whether existing policies for Jodrell Bank remain effective and whether additional guidance or controls are required. It is noted that the Council also intends for growth to be,

"planned in a way that safeguards the significance, setting and operational effectiveness of the Observatory, including assessment of cumulative impacts from multiple developments and, where necessary, the introduction of specific design or mitigation measures" (Paragraph 5.130 of the Scoping document).

2.28 Clowes understands that the Council previously consulted on a Supplementary Planning Document ("SPD") relating to Jodrell Bank. However, the SPD has not been adopted.

Therefore, Clowes reserves the right to comment on any evidence base document that is to be prepared to support the Council's policies relating to Jodrell Bank and its buffer zone.

2.29 It is assumed that a methodology will be prepared, which will underpin the prospective planning policy on Jodrell Bank and which the Council will expect applicants to follow to ascertain the potential impact of future development (where relevant) on Jodrell Bank. Clowes reserves the right to comment on this methodology at the appropriate time. However, the methodology prepared to assess the impact of prospective development on Jodrell Bank must be clear that extant planning permissions should be taken into account and that alternative proposals for these sites should be assessed in the context of the extant consents, i.e., the impact of the development that is the subject of the extant planning permission on Jodrell Bank should be compared to the impact of the development that is the subject of the prospective planning application on Jodrell Bank. Furthermore, any assessment of the impact of development on Jodrell Bank must, ultimately, be weighed in the planning balance, and this should be made clear in any prospective planning policy and accompanying evidence base document.

2.30 Further to the above, if specific design or mitigation measures are to be required, as referred to at paragraph 5.130 of the Council's Scoping document, it will be important that such measures are informed by the Council's evidence base and do not negatively impact on the deliverability and/or viability of development. In this context, Clowes is pleased to note the Council's acknowledgement of such measures being *"where necessary"*, and considers that this wording should be carried forward in any relevant future planning policy relating to design and mitigation measures for development in the context of Jodrell Bank.

Evidence Base

2.31 Clowes supports the Council's intention to develop a comprehensive and up-to-date evidence base to underpin the new Local Plan and reserves the right to comment on the Council's evidence base documents as part of the forthcoming consultations.

3 SUMMARY AND CONCLUSIONS

3.1 In summary, Clowes is supportive of the Council's intention to prepare and adopt a new Local Plan for Cheshire East. It is important that CEC takes this generational opportunity to plan appropriately for the future of Cheshire East and, thus, pursues a pro-growth approach to delivering homes to address the Borough's significant housing needs (including for Extra Care housing) and to support development that contributes positively to economic growth over the next 20 years.

3.2 Clowes would welcome engagement with the Council on these representations or on the Phase 5, Viking Way, site specifically, and this can be arranged by Asteer.