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The Crown Estate

Representations to the Cheshire East Local Plan Scoping Consultation 2026

September 2026

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1. Introduction

1.1. Deloitte LLP is instructed by The Crown Estate ("TCE") to submit representations to the Cheshire East Local Plan Scoping Consultation (2026). TCE welcomes the opportunity to engage at this early stage in the preparation of the new Cheshire East Local Plan. The scoping consultation represents an important stage in establishing the matters that the Local Plan should address, the evidence base required to support it, and the approach to future engagement with stakeholders.

1.2. The new Local Plan will need to respond to a materially changed planning context, including a significantly increased housing requirement, the Council's current housing land supply position, the new plan-making system, the emerging Cheshire and Warrington Spatial Development Strategy, and the publication of the August 2026 National Planning Policy Framework ("NPPF") during the consultation period.

1.3. TCE welcomes the preparation of a positively prepared, ambitious and deliverable Local Plan which 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, public transport accessibility, active travel connections, environmental enhancement and long-term stewardship.

1.4. In summary, TCE considers that the new Local Plan should:

- meet identified housing and employment needs in full and test whether additional growth is justified by economic, affordable housing or infrastructure considerations;
- establish a clear and deliverable spatial strategy informed by a robust assessment of reasonable alternatives;
- assess Green Belt, Grey Belt and safeguarded land through a transparent and integrated methodology;
- give appropriate weight to well-connected locations, including Key Service Centres and rail-connected settlements;
- identify a diverse portfolio of sites capable of contributing across different scales and timescales; and
- integrate infrastructure, employment, sustainable transport and environmental enhancement with decisions about the location of growth.

Background and Context

1.5. TCE is a long-term landowner within Cheshire East through its ownership of the Tabley Estate, with landholdings around Knutsford and Plumley. Its interests include land allocated for development within the adopted Local Plan, safeguarded land identified through the adopted Local Plan process, and a wider portfolio of landholdings which have been submitted through the Council's recent Call for Sites process.

1.6. As a long-term landowner and steward of public assets, TCE is committed to working positively with Cheshire East Council throughout preparation of the new Local Plan. These representations seek to support the preparation of a robust and evidence-led

Local Plan and to ensure that a broad range of growth opportunities are appropriately assessed through the emerging evidence base and site assessment process.

1.7. TCE's land interests are relevant to the preparation of the emerging Local Plan in a number of respects. These include:

- Land West of Manchester Road, Knutsford, which comprises land allocated for residential and employment development within the adopted Local Plan (LPS 36). A full planning application (ref. 26/1231/FUL) was submitted in March 2026 on parcel B of the allocation, which is currently being determined. TCE remains committed to delivering the remainder of the allocation in a timely fashion.
- Land North and South of Tabley Road, Knutsford, comprising safeguarded land identified in adopted Local Plan policies LPS 39 and LPS 40 as land to meet longer-term development needs.
- A wider portfolio of landholdings around Knutsford and Plumley, comprising opportunities of differing scales and characteristics submitted through the Council's Call for Sites process. This includes land associated with the potential future growth of Knutsford as a Key Service Centre, opportunities associated with the rail-connected settlement of Plumley, and larger landholdings capable of being considered as part of the Council's assessment of longer-term growth options.

1.8. Collectively, these land interests comprise a diverse portfolio of opportunities of different scales and locations within Cheshire East. The emerging Local Plan and supporting evidence base should therefore assess these interests appropriately as part of the Council's consideration of future growth options and the preparation of a sustainable and deliverable spatial strategy.

1.9. The range of options identified above is particularly relevant given the materially increased housing requirement and the need for the Local Plan to identify a sufficient and resilient supply of suitable, available and deliverable sites.

1.10. It is therefore critical that the new Local Plan is prepared positively, quickly and on the basis of robust evidence. The plan must identify a sufficient supply of suitable, available and deliverable sites to meet housing and employment needs in full, while providing a clear framework for infrastructure, environmental enhancement and high-quality placemaking.

1.11. These representations have been prepared having regard to the NPPF published in August 2026, which applies to relevant plan-making from 17 August 2026. The Council should therefore review the consultation responses, evidence base and next stages of Plan preparation against the final Framework, particularly in relation to Green Belt, Grey Belt, station-related development, strategic sites, housing delivery, economic growth and national decision-making policies.

2. New Local Plan

Matters addressed in the new Local Plan

2.1. TCE supports the broad range of matters identified by the Council for inclusion within the new Local Plan. These appropriately cover housing, employment, transport, infrastructure, climate change, environmental matters, design and placemaking, health and wellbeing and sustainable economic growth.

2.2. However, TCE considers that the Local Plan should be framed first and foremost around the need to respond positively to the significant increase in development requirements now facing Cheshire East. The revised standard method housing need figure, changes to national policy and the Council's current housing land supply position collectively indicate that the new Local Plan will require the Council to reconsider the scale and distribution of growth that informed the adopted Local Plan Strategy.

2.3. In this context, the Local Plan should prioritise the following matters, which will be central to establishing a positive and deliverable growth strategy:

- meeting housing and employment needs in full;
- establishing a clear and deliverable spatial strategy;
- undertaking an evidence-led review of Green Belt and Grey Belt land where necessary to meet identified needs;
- identifying a sufficient supply of deliverable and developable sites;
- planning infrastructure alongside growth;
- promoting sustainable transport and well-connected locations; and
- supporting long-term economic competitiveness.

2.4. TCE considers that these issues are intrinsically linked and should not be considered through separate strategic policy workstreams. Housing, employment, infrastructure, transport and environmental enhancement should instead form part of a single integrated growth strategy.

Why prepare a new Local Plan

2.5. TCE strongly supports the preparation of a new Local Plan. The adopted Local Plan was prepared within a materially different policy and housing context. The increased housing requirement, national policy changes, the Council’s housing land supply position and the emerging Cheshire and Warrington strategic context require a new and deliverable spatial strategy.

2.6. An up-to-date Plan will provide the framework needed to coordinate housing, employment, infrastructure and environmental improvements. Without it, there is a greater risk that development will be determined through individual applications and appeals rather than through a planned spatial strategy.

Developing the new Local Plan

2.7. TCE supports the Council's intention to progress the Local Plan in accordance with the new plan-making system.

2.8. The emerging Cheshire and Warrington Spatial Development Strategy ('SDS') will form an important part of the wider strategic planning context, including in relation to broad growth locations, infrastructure and economic priorities. The Cheshire East Local Plan should continue without delay while retaining sufficient flexibility to respond to relevant strategic priorities as the SDS emerges. The NPPF and PPG emphasise the importance of effective cooperation on strategic planning matters. Given the Combined Authority's role in coordinating growth, infrastructure and transport priorities across the city region, the Council should continue to engage closely with the Combined Authority throughout plan preparation to ensure alignment with wider strategic objectives.

2.9. The Council should ensure that decisions regarding the spatial strategy are informed by a robust and proportionate evidence base. In particular, the following studies will have a critical role in shaping future growth options:

- Green Belt Assessment;
- Land Availability Assessment;
- Settlement Hierarchy Review;
- Spatial Distribution Report;
- Housing Needs Assessment;
- Employment Land Review;
- Infrastructure Delivery Plan; and
- Viability Assessment.

2.10. TCE considers it important that these documents are prepared and published sufficiently early to enable meaningful engagement before key strategic decisions become fixed.

3. Context for the new Local Plan

Increase in housing requirements

3.1. The materially increased housing requirement represents a fundamental change in the planning context for the new Local Plan. It will require the Council to reconsider the distribution of growth, the role of different settlements, realistic brownfield capacity, the need for Green Belt release, and safeguarded land, settlement extensions and strategic-scale opportunities.

3.2. Policies HO1 and HO2 of the August 2026 NPPF require the Plan to establish a housing requirement based on local housing need as a minimum and to consider a higher figure where justified as necessary to reflect economic growth and infrastructure investment. TCE considers that the Plan should meet the revised standard method figure as a minimum and test whether a higher requirement is justified by economic growth, infrastructure investment, affordable housing need and emerging Cheshire and Warrington SDS priorities.

3.3. The Council's current five-year housing land supply position reinforces the need for a positive and deliverable plan-led strategy. Cheshire East Council's latest published Housing Monitoring Update (March 2025) concludes that the Council has 3.3 years' supply of deliverable housing sites against the required five years. In the absence of a demonstrable five-year supply, housing delivery is increasingly influenced by applications and appeals rather than a coordinated spatial strategy. Strong recent delivery identified through the Housing Delivery Test (August 2026) is welcomed, but it is not a substitute for a positively prepared Local Plan capable of maintaining housing delivery through the plan period.

3.4. This shortfall demonstrates that the Local Plan must identify a larger and more resilient portfolio of deliverable and developable sites. It should not rely on any single source of supply or any single settlement tier. Instead, it should identify strategic allocations, urban extensions, station-related opportunities, and smaller and medium-sized sites capable of supporting delivery across the plan period, whilst also helping to maintain and enhance the vitality of settlements across the Borough by supporting local services, facilities, infrastructure and sustainable communities.

3.5. TCE's land interests demonstrate the breadth of opportunities that may be available to support this approach and should be assessed through the emerging evidence base alongside other reasonable alternatives.

Changes to Green Belt policy

3.6. TCE supports the Council's intention to undertake a borough-wide Green Belt Assessment as part of the Local Plan evidence base. This will be a critical component of the emerging Plan given the significant extent of Green Belt within Cheshire East and the scale of development now required.

3.7. The Green Belt is an important planning designation and its purposes should be properly assessed. However, it should not be treated as a fixed constraint that prevents consideration of sustainable growth options where development needs cannot otherwise be met. The August 2026 NPPF provides a clear framework for Green Belt review through plan-making where exceptional circumstances are evidenced and justified.

3.8. Policy GB3 of the NPPF confirms that exceptional circumstances include situations where a local planning authority is unable to meet its identified need for homes, commercial or other development in full, having examined all other reasonable options. That position is directly relevant to Cheshire East, given the significant increase in housing need and the Council's current housing land supply position.

3.9. Policy GB4 requires Green Belt boundary alterations to promote sustainable patterns of development, giving priority to previously developed land in sustainable locations, then Grey Belt land in sustainable locations, and then other Green Belt locations where this would promote a sustainable pattern of development overall. The assessment should therefore consider not only the Green Belt function of land, but also the sustainability of the location and the ability of development to support infrastructure, services and sustainable movement patterns.

3.10. TCE considers that the Green Belt Assessment should be sufficiently detailed to identify variations in how land performs against Green Belt purposes. Broad-brush assessment parcels risk obscuring opportunities where land performs a limited Green Belt function, where defensible boundaries exist, or where development could be planned comprehensively without undermining the wider function of the Green Belt.

3.11. The assessment should pay particular attention to opportunities around Knutsford. As a Key Service Centre with a strong range of services, facilities, employment opportunities and transport connections, the settlement is capable of accommodating growth. The Green Belt Assessment should therefore consider the extent to which opportunities around the settlement could contribute towards the Borough's development requirements.

3.12. Plumley should be assessed positively in light of its railway station. Its role should not be judged solely by population size or current settlement classification, but also by its public transport accessibility and its potential to support sustainable travel, local services and proportionate housing growth. Opportunities around Plumley should therefore be assessed through the Settlement Hierarchy Review and Spatial Distribution Strategy, having regard to their ability to support sustainable travel patterns, local services and proportionate growth.

3.13. The safeguarded land north and south of Tabley Road (LPS 39 and LPS 40) is an example of land that has already been identified through the adopted Local Plan as land which may be required to meet longer-term development needs, and which remains available to be considered as part of the emerging Local Plan. In the context of the revised housing requirement and the lack of a five-year housing land supply, the Council should consider a more general, positive approach to sustainable and deliverable proposals on safeguarded land in advance of and separate from the completion of the Local Plan process.

3.14. Pending adoption of the new Local Plan, the Council should consider preparing an interim housing position statement setting out a positive and transparent approach to the determination of housing proposals on safeguarded land. Such an approach would not alter the formal designation of the land, which would remain a matter for the Local Plan

review, nor displace the statutory priority afforded to the development plan. It would, however, recognise that policies restricting housing development on safeguarded land should be applied in light of the Council's current housing land supply position, the materially increased housing requirement and the presumption in favour of sustainable development.

3.15. The approach adopted by Kirklees Council provides a relevant precedent. Its Interim Housing Position Statement retains the adopted safeguarded-land designation but recognises that, in the absence of a five-year housing land supply, safeguarded sites may provide opportunities for early housing development where constraints can be overcome. Cheshire East should adopt a similarly positive approach, giving substantial weight to sustainable and deliverable proposals on safeguarded land, particularly where sites are well related to existing settlements, can be supported by appropriate infrastructure and are capable of contributing to housing supply within the short term. Such an approach would provide an appropriate framework for the early consideration of the safeguarded land relating to LPS 39 and LPS 40, both of which are well related to Knutsford and capable of contributing to housing delivery in the short term.

3.16. TCE supports a robust Green Belt and Grey Belt assessment but considers that it must be applied in a manner that enables genuinely sustainable and deliverable sites to be considered through the plan-making process. Given the central role that Green Belt and Grey Belt considerations are likely to play in accommodating Cheshire East's future development needs, TCE considers that the Green Belt Assessment should be treated as a priority evidence base document and prepared sufficiently early to inform key decisions regarding the spatial strategy and distribution of growth. This will be essential if the Local Plan is to meet development needs in full while promoting a sustainable spatial strategy.

Brownfield Development

3.17. TCE supports the effective use of previously developed land where such land is suitable, available and deliverable. A brownfield-first approach is appropriate and consistent with national policy.

3.18. However, the scale of housing and employment growth now facing Cheshire East means that brownfield land alone will not provide a sufficient solution. The Council's own monitoring evidence demonstrates that a substantial proportion of development has historically been delivered on greenfield sites, with previously developed land accounting for only around one-third of housing completions in recent monitoring years. Brownfield sites can also face constraints relating to ownership, viability, contamination, infrastructure, market demand and delivery timescales. The Local Plan should therefore avoid placing undue reliance on brownfield capacity where there is no clear evidence that it can meet the Borough's needs in full.

3.19. The Council's own scoping material identifies that the new Local Plan may need to consider a range of options, including densification, further development within existing settlements, edge-of-settlement growth, large-scale urban extensions and new settlements. TCE supports that broad approach.

3.20. The Local Plan should therefore maximise brownfield opportunities while also identifying sustainable greenfield and Green Belt locations where these are necessary to meet housing and employment needs. TCE's landholdings across the Tabley Estate provide examples of greenfield and Green Belt opportunities that could deliver new homes, employment land, infrastructure, open space and environmental benefits in sustainable locations.

Economic Growth

3.21. TCE supports the Council's recognition that Cheshire East has an important economic role and that the new Local Plan must plan positively for employment growth, investment and long-term competitiveness. The emerging Plan should ensure that housing, employment and infrastructure are planned in a coordinated manner so that growth is capable of supporting sustainable economic outcomes across the Borough.

3.22. Policy E1 of the August 2026 NPPF requires development plans to establish a clear economic vision and strategy, support business investment, and allocate sites to meet anticipated employment needs over the plan period. The policy recognises the importance of providing flexibility to respond to changing economic circumstances and supporting a diverse range of sectors and business activities.

3.23. Housing and employment growth should not be considered separately. A sustainable spatial strategy should seek to align new homes with employment opportunities, services, infrastructure and sustainable transport. This will help reduce commuting distances, support inclusive economic growth and ensure that housing delivery supports the labour force required by the local economy.

3.24. Given Knutsford's role as a Key Service Centre and its proximity to strategic transport infrastructure, opportunities around the settlement should be assessed not only in terms of housing delivery but also in terms of their ability to support employment growth, investment and wider economic objectives across Cheshire East and the sub-region. Knutsford benefits from strong connectivity to the strategic highway network, Manchester Airport, Greater Manchester and the wider Cheshire and Warrington economy. The Council's assessment of growth options around the settlement should therefore take account of their potential contribution to both housing and employment needs.

3.25. TCE's land interests associated with the wider Tabley Estate also provide an opportunity for the Council to consider how larger-scale growth options could contribute towards economic objectives over the longer term. In addition to supporting housing delivery, such opportunities may have the potential to support employment provision, infrastructure investment, sustainable transport improvements and enhanced connectivity between homes, jobs and services. The precise scale and form of any such contribution should be determined through the evidence base and site assessment process.

3.26. Opportunities around Knutsford, together with other opportunities within the wider Tabley Estate, should therefore be assessed through the Economic Development Needs Assessment, Employment Land Review and Spatial Distribution Strategy. This assessment should consider not only their ability to contribute towards housing delivery, but also their potential role in supporting labour market accessibility, business growth, infrastructure investment and wider economic competitiveness.

3.27. More generally, the Local Plan should assess a broad range of growth options and determine the most appropriate scale and distribution of development having regard to housing need, employment requirements, infrastructure capacity, sustainability considerations and long-term economic objectives. The Plan should provide sufficient flexibility to respond to changing economic circumstances whilst ensuring that future growth contributes positively to Cheshire East's economic success and competitiveness.

Spatial Development Strategy

3.28. TCE notes that Cheshire East is now part of the Cheshire and Warrington Combined Authority area and that a Spatial Development Strategy will be prepared for Cheshire and Warrington. TCE supports strategic planning at the sub-regional level, particularly where it helps align housing, employment, infrastructure, transport and environmental priorities across administrative boundaries.

3.29. However, preparation of the Cheshire East Local Plan should not be delayed pending the Spatial Development Strategy. The Local Plan should continue to progress, identify sufficient land to meet development needs and establish an appropriate spatial strategy, while retaining flexibility to respond to any relevant strategic priorities that emerge through the SDS process.

3.30. Policy PM1 of the August 2026 NPPF confirms that Spatial Development Strategies should identify broad locations for growth and regeneration, including new settlements, major urban extensions and major cross-boundary development where appropriate. TCE supports this approach, recognising that large-scale strategic development requires coordinated planning across administrative boundaries, particularly in relation to transport, utilities and wider infrastructure capacity and delivery. The Cheshire East Local Plan should therefore align with any broad growth locations identified through the forthcoming Cheshire and Warrington Spatial Development Strategy, while retaining sufficient flexibility to respond to the SDS as it emerges. This alignment will be important to ensure that strategic sites are planned comprehensively and supported by the infrastructure necessary for their delivery.

3.31. Opportunities around Knutsford and within the wider Tabley Estate are of sufficient scale to warrant assessment through the Local Plan process and, where relevant, the emerging spatial development strategy. Their potential role should be informed through the Council's evidence base and considered alongside other reasonable alternatives in establishing the most appropriate spatial strategy.

National Decision-Making Policies

3.32. TCE supports the Council's recognition that the introduction of National Decision-Making Policies provides an opportunity for local plans to focus on genuinely local matters.

3.33. The Local Plan should avoid unnecessary duplication of national policy and instead focus on the issues that are specific to Cheshire East, including the spatial strategy, site allocations, settlement hierarchy, Green Belt review, affordable housing requirements and infrastructure planning.

3.34. However, this should not result in an overly narrow plan. The Local Plan remains the primary mechanism through which Cheshire East will determine how and where future growth is accommodated and therefore should provide a strategic vision that aligns with national and regional policies.

4. Baseline information and spatial portrait

Connectivity

4.1. TCE supports the Council's recognition of Cheshire East's strong connectivity and strategic location. The Borough benefits from excellent connections to regional and national transport networks, including the M6 and M56 motorways, Manchester Airport and an extensive rail network.

4.2. Connectivity should form a central part of the future spatial strategy. The Local Plan should direct growth towards locations which are well connected by public transport or which have the ability to support improvements to sustainable transport infrastructure.

4.3. The August 2026 NPPF places increased emphasis on locating development where it can make effective use of existing and proposed transport infrastructure, including through its support for residential and mixed-use development within reasonable walking distance of qualifying well-connected railway stations. In this regard, opportunities around Knutsford, including land associated with the Tabley Estate, should be assessed in the context of the settlement's role as a Key Service Centre, its relationship with the strategic highway network and its accessibility to employment and services. Future growth in this part of the Borough has the potential to support sustainable travel patterns and infrastructure investment where planned comprehensively.

4.4. Opportunities around Plumley are also relevant in this context. As a rail-connected settlement, Plumley provides a distinctive opportunity to consider how proportionate growth can support sustainable travel patterns, reinforce the role of the railway station and contribute to the long-term vitality of local services and facilities.

4.5. Larger-scale opportunities within TCE's land portfolio may provide scope for transport and infrastructure requirements to be considered comprehensively alongside development. The Council should assess not only current accessibility but also the extent to which growth may support improvements to transport, active travel, infrastructure and service provision.

Economic contribution

4.6. Cheshire East plays a significant role within the wider North West economy and benefits from a diverse economic base, strong transport connections and a number of nationally and regionally important employment centres. The Borough's economic success has historically been supported by its ability to attract and retain a skilled workforce, provide a high-quality environment for investment and deliver a range of housing opportunities across its settlements.

4.7. TCE supports the Council's recognition that economic growth should remain a central component of the emerging Local Plan. The Local Plan should not treat housing delivery and economic development as separate policy objectives. Instead, it should recognise that the two are fundamentally linked and that a sufficient supply of homes is essential to

support labour market growth, improve affordability and maintain the competitiveness of the Borough's economy.

4.8. The emerging evidence base should therefore consider how housing need, employment growth and infrastructure provision interact. This is particularly important given the significant increase in housing requirements and the potential implications this may have for labour supply, commuting patterns and business investment. The Local Plan should ensure that growth is distributed in a manner that supports both existing employment centres and future economic opportunities.

4.9. TCE considers that strategic and mixed-use development opportunities can play an important role in delivering this objective. Larger sites are often capable of supporting housing, employment, community infrastructure and sustainable transport improvements through a coordinated and masterplanned approach. Such opportunities can help create balanced communities, reduce the need to travel and provide greater certainty regarding infrastructure delivery.

4.10. The Local Plan should therefore positively assess a range of growth options capable of supporting both housing and economic objectives. This should include consideration of strategic urban extensions, mixed-use sites and potential longer-term growth opportunities where these can contribute towards the Borough's economic resilience, competitiveness and productivity.

4.11. Overall, the Local Plan should seek to establish a clear relationship between housing growth, employment growth and infrastructure investment, ensuring that future development supports Cheshire East's role as a sustainable and economically successful location within the wider region.

4.12. Strategic growth opportunities around Knutsford and within the wider Tabley Estate are particularly relevant because they can integrate homes, employment land, transport improvements, digital infrastructure, utilities and sustainable travel connections through comprehensive masterplanning. Their relationship with the M6 corridor, Knutsford railway station and the Mid-Cheshire rail corridor should be assessed as part of the evidence base, particularly where this could support labour market accessibility, business connectivity and investment in high-value sectors.

5. Scope of the new Local Plan

Local Plan Period

5.1. TCE supports the proposed plan period to 2045. However, the Local Plan should also consider longer-term growth requirements beyond the end of the plan period, particularly where strategic urban extensions or new settlement opportunities are being assessed. Larger sites may require delivery across multiple phases and potentially beyond a single plan period. This should not prevent such opportunities from being considered through the plan-making process, although their delivery may extend beyond a single plan period.

Vision and Objectives

5.2. TCE supports the preparation of a clear, locally distinctive and deliverable vision for Cheshire East. The vision should respond directly to the changed planning context, including the higher housing requirement, current housing land supply shortfall, economic growth ambitions, the need for Green Belt review and the publication of the August 2026 NPPF.

5.3. The vision should not simply seek to manage growth. It should explain how Cheshire East will accommodate growth positively and sustainably, while delivering homes, employment, infrastructure, environmental enhancement and healthy communities.

5.4. TCE considers that the vision and objectives should include the following priorities:

- meeting housing need in full, as a minimum;
- testing whether a higher housing requirement is justified by economic growth, affordable housing need or infrastructure investment;
- supporting sustainable economic growth and employment delivery;
- ensuring a sufficient supply of affordable homes and a broad housing mix;
- reviewing Green Belt boundaries where necessary to meet needs;
- testing strategic urban extensions and new settlement options;
- supporting growth at sustainable settlements and rail-connected locations;
- integrating infrastructure planning with site allocation decisions;
- delivering multifunctional green infrastructure, biodiversity net gain and climate resilience; and
- maintaining a deliverable supply of sites throughout the plan period.

Identifying and assessing sites

5.5. TCE supports the Council's intention to prepare a robust and evidence-led assessment of potential development sites. The assessment process will be critical to ensuring that

the Local Plan identifies a sufficient supply and mix of sites to meet the Borough's development needs.

5.6. Policy PM9 of the August 2026 NPPF requires development plans to be informed by an assessment of land available to meet development needs, including consideration of availability, suitability, achievability, likely viability, site capacity and delivery timescales.

5.7. TCE considers that the site assessment methodology should be transparent, proportionate and capable of assessing different categories of site. It should not be designed in a way that favours only one type or scale of development. Smaller sites, safeguarded land, settlement-edge opportunities, strategic urban extensions and new settlements will all need to be assessed through an appropriate methodology.

5.8. The assessment process should give appropriate weight to:

- land ownership and availability;
- deliverability and likely delivery timescales;
- ability to contribute to five-year housing land supply;
- relationship to existing settlements and services;
- relationship to railway stations and strategic transport corridors;
- potential to deliver housing, employment and community facilities together;
- ability to support affordable housing and housing choice;
- infrastructure requirements and opportunities;
- ability to deliver green infrastructure and biodiversity net gain;
- Green Belt performance, where relevant;
- landscape, heritage, ecology and flood risk considerations; and
- long-term flexibility and phasing.

5.9. The assessment should avoid applying overly restrictive criteria at an early stage. In particular, strategic sites and new settlement options should not be discounted simply because they require comprehensive masterplanning or longer delivery periods. Such sites may be important to maintaining supply over the middle and later parts of the plan period and may provide opportunities to deliver infrastructure and environmental benefits at scale.

5.10. TCE's landholdings are relevant to this assessment because they include sites capable of contributing across a range of timescales. The allocated land West of Manchester Road, the safeguarded land at Tabley Road and smaller sites around Knutsford and Plumley could contribute early in the plan period. Larger scale opportunities within the wider Tabley Estate provide longer-term strategic options capable of supporting comprehensive infrastructure-led growth.

5.11. TCE therefore requests that the Council's site assessment methodology expressly recognises the different roles that sites can play across the plan period, including early delivery, settlement-edge growth, rail-connected growth, and strategic urban extensions and new settlements.

Green Belt

5.12. TCE notes the approach set out at paragraphs 5.16 and 5.17 of the scoping consultation for determining whether Green Belt boundary changes are required. This exercise should be integrated with, rather than undertaken separately from, the assessment of sites, settlement hierarchy and spatial distribution. The Council's own consultation identifies site selection, Green Belt, settlement hierarchy and spatial strategy as interrelated considerations in planning for growth.

5.13. TCE supports the assessment of future development needs and the effective use of suitable brownfield and underused land. However, the sequential considerations listed at paragraph 5.17 should not operate as a series of rigid filters through which otherwise sustainable Green Belt sites are excluded before their comparative merits have been assessed. In particular, the existence of theoretical capacity outside the Green Belt should not be treated as sufficient unless that capacity is demonstrated to be suitable, available, deliverable and capable of supporting a sustainable spatial strategy.

5.14. All reasonable growth options should therefore be assessed through a consistent and transparent framework. For Green Belt sites, this should bring together:

- the contribution of the land to Green Belt purposes, including whether it comprises Grey Belt;
- the site's relationship with the settlement hierarchy and existing settlement form;
- accessibility to services, employment and public transport, including railway stations;
- infrastructure capacity and the opportunity for development to deliver improvements;
- availability, deliverability, viability, capacity and likely phasing;
- environmental, landscape, heritage and flood-risk considerations; and
- the ability to deliver housing, employment, community facilities, green infrastructure and wider public benefits comprehensively.

5.15. This would align the Green Belt exercise with the wider spatial-distribution factors identified by the Council, which include housing and employment needs, infrastructure, services, environmental constraints, Green Belt, brownfield availability, site availability, market attractiveness and viability.

5.16. TCE considers that "considering sites outside the Green Belt first" should mean that reasonable non-Green Belt alternatives are properly examined; it should not establish an automatic preference for a less sustainable or less deliverable location solely because it lies outside the Green Belt. Comparative assessment should consider whether each option would promote a sustainable pattern of development and contribute effectively to meeting identified needs.

5.17. Similarly, optimising density and maximising brownfield capacity are important components of the strategy, but the Council should test whether the resulting capacity is realistic and deliverable over the plan period. These measures should not be relied upon to defer the assessment of Green Belt opportunities where additional land may be required to meet development needs in full and maintain a sufficient and resilient supply of sites.

5.18. Where exceptional circumstances are identified, decisions on potential Green Belt release should be made through the wider spatial strategy and site-selection process. Appropriate weight should be given to opportunities that are well related to existing settlements or well-connected railway stations, as well as strategic sites capable of delivering infrastructure, employment provision, sustainable transport, community facilities and environmental improvements through comprehensive masterplanning. The Council expressly anticipates testing a range of options, including edge-of-settlement growth, large-scale urban extensions and new settlements; Green Belt location or site scale should not prevent those options from being assessed on a comparable basis.

5.19. The land availability methodology should explain clearly how Green Belt considerations will interact with the initial site sift, scoring and subsequent allocation stages. Sites should not be filtered out solely because of their existing Green Belt designation before the Green Belt assessment, settlement hierarchy review, spatial distribution work and sustainability assessment have been considered together. The Council proposes to publish its methodology and initial site assessments at the subsequent plan content and evidence consultation; these should provide a clear audit trail showing how the factors above have informed each assessment.

5.20. Applied in this way, the approach at paragraphs 5.16 and 5.17 would enable the Local Plan to identify the most sustainable and deliverable combination of sites while protecting Green Belt land that makes the strongest contribution to its purposes. It would also ensure that smaller releases, safeguarded land, settlement extensions and strategic-scale opportunities are assessed fairly and through a methodology appropriate to their scale and potential contribution.

5.21. TCE requests that the Council clearly sets out how the findings of the Green Belt assessment have informed the assessment of reasonable alternatives and site selection process, alongside sustainability, deliverability and infrastructure considerations.

5.22. Pending the completion of that process, the Council should also consider an interim housing position statement establishing a positive and transparent approach to sustainable and deliverable housing proposals on safeguarded land, as set out earlier in these representations.

Strategic green gap

5.23. TCE supports the Council's intention to review the Strategic Green Gap designation and its role within the emerging Local Plan.

5.24. Strategic Green Gaps can play an important role in maintaining the separation and identity of settlements. However, the review should be evidence based and should recognise that not all land within a designated gap performs the same function.

5.25. The assessment should identify those locations that make the greatest contribution to maintaining separation whilst recognising that the scale of development needs now facing Cheshire East may require a balanced assessment between protecting settlement identity and accommodating sustainable growth.

5.26. The Strategic Green Gap should therefore not operate as an absolute constraint on development. Instead, it should form part of a wider planning balance which takes account of housing need, sustainability, deliverability, infrastructure provision and landscape considerations.

Settlement Hierarchy

5.27. TCE supports the Council's intention to review the settlement hierarchy as part of the preparation of the new Local Plan. Given the scale of housing need now facing Cheshire East, the settlement hierarchy will play a significant role in shaping the distribution of development and identifying sustainable locations for growth.

5.28. The hierarchy should be informed by an up-to-date assessment of the role and function of settlements. It should consider access to services and facilities, employment opportunities, public transport, active travel, strategic infrastructure, settlement form, market demand, recent growth, infrastructure capacity and the potential for development to support improvements.

5.29. TCE supports Knutsford continuing to be identified as a Key Service Centre. Knutsford has a strong range of services, facilities and employment opportunities, and benefits from a strategically accessible location. It should therefore be considered as a settlement capable of accommodating a meaningful proportion of future growth.

5.30. The previous Local Plan directed approximately 950 dwellings to Knutsford, which was lower than the level of growth directed to several other Key Service Centres. In light of the increased housing requirement and the scale of available land around the settlement, the new Local Plan should consider whether Knutsford should accommodate a greater level of growth over the new plan period.

5.31. TCE's land interests around Knutsford provide a practical basis for assessing this issue. Land West of Manchester Road is already allocated for mixed-use development. Land North and South of Tabley Road comprises safeguarded land capable of forming a logical next phase of growth. Given the Council's current housing land supply position and increased housing requirement, these sites should be considered not only through the Local Plan review but also through any interim approach adopted in respect of safeguarded land proposals. Larger scale opportunities around Knutsford could deliver homes, employment, services, open space and infrastructure in a comprehensive manner.

5.32. TCE also considers that the role of Plumley should be reviewed carefully. Plumley benefits from a railway station and should not be assessed in the same way as more remote rural settlements with no rail connectivity. The August 2026 NPPF includes support for development associated with well-connected stations, subject to relevant criteria.

5.33. The Settlement Hierarchy Review should therefore give appropriate weight to public transport accessibility and the potential for station-related growth. TCE's land interests around Plumley provide examples of opportunities that could contribute to proportionate growth at a rail-connected settlement.

Spatial Distribution

5.34. TCE considers that the spatial distribution of development is one of the most important matters for the new Local Plan. The scale of housing need now facing Cheshire East means that the Council will need to test a broad range of options and should avoid an overly narrow approach to growth.

5.35. TCE supports a balanced spatial strategy which draws on a variety of site types and locations. This should include urban regeneration, brownfield land, existing allocations, safeguarded land, sustainable urban extensions, station-related development, smaller and medium-sized sites, and potential new settlements.

5.36. Policies HO3 and HO4 of the August 2026 NPPF support this approach. Policy HO3 requires local plans to identify a sufficient supply and mix of sites to meet or exceed the housing requirement over the plan period. Policy HO4 recognises the role of strategic sites, including new settlements and significant extensions to existing settlements, where they can be supported by infrastructure and can create sustainable communities.

5.37. In TCE's view, the Local Plan should avoid excessive reliance on either dispersed small-scale development or a limited number of large strategic allocations. A resilient strategy will require both. Smaller and medium-sized sites can support early delivery and housing diversity, while larger sites can deliver infrastructure, employment land, community facilities, green infrastructure and long-term supply.

5.38. TCE's landholdings illustrate this balanced approach. The allocated land West of Manchester Road and safeguarded land North and South of Tabley Road could contribute to earlier delivery at Knutsford, including through any positive interim approach to safeguarded land in advance of the new Local Plan. Larger scale opportunities around Knutsford and within the wider Tabley Estate could provide longer-term growth options. The Plumley sites could support proportionate growth associated with a rail-connected settlement.

5.39. The new Local Plan should assess these opportunities as part of a comparative assessment of reasonable alternatives. This should include consideration of sustainability, deliverability, infrastructure, Green Belt performance, access to services, transport connectivity, environmental effects and the ability to deliver wider public benefits.

Development in the Settlements and the Countryside

5.40. TCE supports the continued use of settlement boundaries as a tool for managing development. However, settlement boundaries should not become inflexible constraints that prevent otherwise sustainable opportunities from being properly assessed. Settlement boundaries should be reviewed alongside the Settlement Hierarchy Review and Spatial Distribution Report to ensure they reflect the strategy of the new Local Plan.

5.41. The Local Plan should also recognise an important distinction between isolated countryside locations and sites which are physically related to existing settlements, strategic transport infrastructure or railway stations.

5.42. Locations which are well connected and relate closely to existing settlements may be capable of accommodating growth in a way that supports sustainable travel patterns and strengthens existing communities.

5.43. This will be particularly important in considering the role of rail-connected settlements and opportunities associated with strategic growth locations around Knutsford and Plumley.

5.44. TCE supports a positive approach to development associated with sustainable rural settlements, particularly where such settlements benefit from public transport connectivity. Plumley represents an example of a settlement capable of accommodating carefully planned growth due to its railway station and strategic accessibility.

Housing

5.45. TCE supports the Council's intention to address housing need, affordable housing, housing mix, older persons housing, specialist accommodation, self-build and custom-build housing, and housing diversification through the new Local Plan.

5.46. The Housing Needs Assessment should inform the quantity, type, size and tenure of housing required across Cheshire East. However, housing policies should be prepared alongside the spatial strategy, viability evidence and infrastructure planning. Policy requirements must be ambitious but deliverable.

5.47. Policy PM12 of the August 2026 NPPF requires development plans to set out the contributions expected from development, including affordable housing and infrastructure, at a level that allows the planned types of development and sites to be deliverable. Policy PM13 also requires quantitative standards to be justified, proportionate and not to have an adverse impact on viability and deliverability.

5.48. TCE supports the objective of increasing affordable housing delivery. However, affordable housing requirements, including any requirements associated with Green Belt release, should be tested through robust viability evidence. This will be particularly important where sites are expected to deliver affordable housing, infrastructure, open space, biodiversity net gain, sustainable drainage, transport improvements and other policy requirements.

5.49. TCE's landholdings offer the potential to deliver a range of housing types and tenures. Smaller sites at Plumley and Knutsford could contribute to housing choice and earlier delivery. Larger strategic opportunities within the wider Tabley Estate around Knutsford could support mixed communities with affordable housing, older persons housing, specialist accommodation and a range of market housing types where justified by evidence.

5.50. The August 2026 NPPF also places emphasis on small and medium-sized sites. 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 1 and 2.5 hectares, unless there are strong reasons why this cannot be achieved.

5.51. The smaller TCE sites at Plumley and around Knutsford should be assessed in this context. They may provide opportunities to diversify supply, support early delivery, assist small and medium-sized builders, and contribute to the vitality of smaller settlements.

Employment and Economy

5.52. TCE supports the preparation of updated evidence on economic development needs and employment land requirements. The Local Plan should ensure that employment land supply is sufficient to support Cheshire East's economic growth ambitions and that housing growth is planned alongside employment growth.

5.53. The Local Plan should consider employment land not only through standalone employment allocations, but also through mixed-use growth opportunities. Mixed-use strategic sites can help create balanced communities, provide local jobs, reduce commuting and support services.

5.54. Opportunities around Knutsford are particularly relevant to the relationship between housing and employment growth. As a Key Service Centre with strong connections to the strategic highway network, Manchester Airport, Greater Manchester and the wider Cheshire and Warrington economy, Knutsford is capable of accommodating growth that supports both housing and employment objectives. The Council should therefore assess opportunities around the settlement not only in terms of housing delivery but also in relation to their potential contribution towards employment growth, investment, labour market accessibility and wider economic objectives.

5.55. Opportunities within the wider Tabley Estate may also provide scope for the Council to consider how housing growth, employment provision, infrastructure investment and sustainable transport improvements can be planned in a coordinated manner. Whilst the scale and form of any future development should be informed through the evidence base, Economic Development Needs Assessment and Employment Land Review, these opportunities should be assessed having regard to their potential contribution towards Cheshire East's long-term economic competitiveness, job creation and wider economic growth objectives.

Transport and Infrastructure

5.56. TCE supports the Council's recognition that transport and infrastructure will be central to the delivery of sustainable growth. The new Local Plan should integrate transport, utilities, education, healthcare, digital infrastructure, green infrastructure and community facilities with the spatial strategy and site allocation process.

5.57. Policy TR1 of the August 2026 NPPF requires sustainable transport considerations to be addressed from the earliest stages of plan-making. It requires plans to locate development where it can support sustainable patterns of movement and make effective use of existing or proposed transport infrastructure.

5.58. TCE considers that transport accessibility should be a central factor in determining the spatial strategy. The Council should consider public transport accessibility, rail connectivity, active travel potential, access to services, relationship to strategic highway corridors and the ability of development to support infrastructure improvements.

5.59. TCE's landholdings around Knutsford and the wider Tabley Estate are well related to the strategic highway network, including the M6 corridor, and to Knutsford's role as a Key Service Centre. The Plumley sites are particularly relevant because of their proximity to Plumley railway station.

5.60. The Local Plan should therefore assess station-related growth opportunities in a positive and evidence-led way. In particular, Plumley should be assessed not only by reference to its current settlement classification, but also by reference to its rail connectivity and the potential for planned growth to support sustainable travel patterns.

5.61. Infrastructure requirements should be viewed not only as constraints, but also as opportunities. Larger strategic sites can help deliver new infrastructure, green infrastructure, active travel routes and community facilities in a coordinated way. This is particularly relevant to TCE's larger scale land interests around Knutsford and within the wider Tabley Estate, where the scale of development could support comprehensive infrastructure planning.

Local Plan Evidence Base

5.62. TCE supports the preparation of a robust, proportionate and up-to-date evidence base. This will be critical to ensuring that the Local Plan is justified, effective and capable of meeting development needs.

5.63. TCE considers that the following evidence will be particularly important:

- Green Belt Assessment;
- Grey Belt assessment;
- Land Availability Assessment;
- Settlement Hierarchy Review;

- Spatial Distribution Report;
- Housing Needs Assessment;
- Economic Development Needs Assessment;
- Employment Land Review;
- Infrastructure Delivery Plan;
- Viability Assessment;
- Sustainability Appraisal;
- Heritage Assessment;
- Strategic Flood Risk Assessment;
- transport evidence; and
- Environmental and landscape evidence.

5.64. The Council should publish key methodologies and emerging findings at the earliest appropriate stage to allow meaningful engagement. This is particularly important in relation to the Green Belt Assessment, Grey Belt findings, Settlement Hierarchy Review, Land Availability Assessment and Spatial Distribution Report.

5.65. The evidence base should be capable of assessing different site typologies consistently and fairly. It should not apply a methodology that unintentionally favours only small sites, only urban sites, or only previously developed land. Existing allocations, safeguarded land, smaller and medium-sized sites, urban extensions and new settlement options should all be assessed in a manner appropriate to their scale and potential contribution.

5.66. TCE requests that its landholdings across the Tabley Estate are assessed fully through this process and that their potential contribution to housing, employment, infrastructure, environmental enhancement and sustainable transport is considered on a consistent basis with other promoted sites.

6. Proposed Local Plan Engagement Strategy

Engagement approach and methods

6.1. TCE supports continued engagement with landowners, site promoters, infrastructure providers, communities and other stakeholders throughout the plan-making process. Effective engagement will be essential to ensuring that the Local Plan is informed by realistic evidence on site availability, deliverability, infrastructure requirements and phasing.

6.2. For strategic sites, engagement should allow promoters to clarify technical evidence, infrastructure assumptions, access arrangements, phasing, masterplanning principles and delivery timescales. This will assist the Council in assessing sites accurately and consistently.

6.3. This is particularly important for larger opportunities such as those within the wider Tabley Estate, where careful consideration will be required in relation to infrastructure, transport, landscape, ecology, heritage, phasing and long-term stewardship.

6.4. TCE would welcome continued engagement with Cheshire East Council as the new Local Plan progresses, including discussions regarding the emerging evidence base, site assessment methodology, Green Belt Assessment, Settlement Hierarchy Review, infrastructure requirements and spatial strategy.

Plan programme and timeline

6.5. TCE supports the Council's proposed programme for Local Plan preparation. Given the scale of housing need now facing Cheshire East and the Council's current housing land supply position, it is important that the Local Plan continues to progress without unnecessary delay.

6.6. Delays in plan preparation risk extending the period during which development decisions are made in the absence of an up-to-date plan-led strategy. The Council should therefore seek to maintain momentum, ensure that key evidence is prepared and made available to stakeholders at an early stage, and continue engagement with stakeholders throughout the process.

7. Conclusion

7.1. TCE supports the preparation of a positively prepared, ambitious and deliverable Local Plan for Cheshire East. The new Local Plan is being prepared in a materially changed planning context, including a significantly increased housing requirement, the Council's current housing land supply position, the new plan-making system, the emerging Cheshire and Warrington Spatial Development Strategy and the publication of the August 2026 NPPF during the consultation period.

7.2. TCE considers that the Local Plan should plan to meet the revised standard method housing requirement as a minimum and should test whether a higher housing requirement is justified having regard to economic growth, affordable housing need, infrastructure investment and emerging sub-regional priorities.

7.3. The Local Plan should identify a sufficient supply and mix of deliverable and developable sites, including brownfield sites, existing allocations, safeguarded land, smaller and medium-sized sites, sustainable urban extensions, station-related growth and potential new settlement opportunities. Pending adoption of the new Local Plan, the Council should also adopt a positive interim approach to sustainable and deliverable proposals on safeguarded land to support short-term housing delivery.

7.4. A review of the Green Belt will be a necessary and important part of the plan-making process. The Green Belt Assessment should be robust, transparent and sufficiently detailed to identify variations in Green Belt performance. It should also consider the sustainability of locations and the ability of development to deliver infrastructure, services and environmental benefits.

7.5. TCE's land interests demonstrate that opportunities exist across a range of locations and planning contexts within Cheshire East. These include allocated and safeguarded land around Knutsford, opportunities around Plumley and larger-scale opportunities within the wider Tabley Estate. Taken together, these locations provide a range of alternatives capable of being assessed through the emerging evidence base as the Council considers how best to accommodate future housing, employment and infrastructure requirements and establish a sustainable and deliverable spatial strategy. TCE therefore requests that Cheshire East Council assesses its landholdings fully and positively through the emerging evidence base, publishes key methodologies and findings early enough to enable meaningful engagement, and continues direct dialogue with TCE as the Local Plan progresses. This will help ensure that the Plan is ambitious, deliverable and capable of meeting Cheshire East's housing, employment, infrastructure and environmental objectives over the full plan period.

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