GLADMAN

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Strategic Planning Team
Cheshire East Council
Delamere House
Delamere Street
Crewe
CW1 2LL

1st September 2026

Re: Cheshire East Council's Scoping Consultation

Dear Strategic Planning Team,

Gladman Developments Ltd (Gladman) welcomes the opportunity to respond to the Scoping consultation for the Cheshire East Local Plan. Gladman has several land interests within the borough that have been submitted to Cheshire East Council (the Council) for consideration for residential development through previous Call for Sites exercises. These include:

- Land off Audlem Road, Audlem (references: HE 101, CFS26 479 and 26/2386/OUT)
- Land off Macclesfield Road, Congleton (references: HE 150 and CFS26 495)
- Land off Waggs Road, Congleton (references: HE 151 and CFS26 509)
- Land off Sandbach Road, Congleton (references: HE 113 and CFS26 561)
- Land off Hind Heath Road, Sandbach (references: HE 149 and CFS26 529)

Gladman is keen to engage further with the Council regarding these land interests as the plan-making process progresses.

The Scoping consultation stage provides the local community and other key stakeholders with the opportunity to express their views at the very start of the plan-making process. The Council is required to seek views on:

- What to include in the Local Plan;
- How to approach future engagement on the Local Plan; and
- Any other matters that it wishes to consult on.

The Council must undertake its Scoping consultation after giving notice of its intention to commence plan-making. The consultation should last for at least 21 days and must finish prior to the publication of the Gateway 1 self-assessment summary. Feedback from the Scoping consultation should be used to inform the community engagement strategy.

For the Scoping consultation, the Council must invite representations from:

- General consultation bodies it considers appropriate; and
- Specific consultation bodies that it considers may have an interest in the preparation of the Local Plan.

The Council intends to meet the above criteria, with the Scoping consultation running between 21st July and 1st September 2026 (six weeks). According to the Council's latest Local Plan Timetable (June 2026), the Gateway 1 self-assessment summary is anticipated to be published on 30th October 2026.

The sections that follow set out the key topics that Gladman considers should be addressed through the new Local Plan.

Vision and Objectives

Gladman submits that the emerging Local Plan's vision and objectives should include an explicit commitment to meeting the borough's current and future housing needs in full. This would provide a clear and unequivocal framework for addressing housing needs over the plan period.

Plan Period

Policy PM2(1)(b) of the National Planning Policy Framework (NPPF) explains that the end date of a local plan must be at least 10 years from the point of adoption. The Scoping Consultation outlines that the emerging Local Plan will cover the period up until 2045. Assuming that the emerging Local Plan is adopted in 2029, as per the Council's latest Local Plan Timetable (June 2026), it would cover 16 years and accord with the NPPF. Whilst the Scoping Consultation was drafted with reference to the December 2024 version of the NPPF that required the end date of a local plan to be at least 15 years from the point of adoption, Gladman encourages the Council to continue to plan for the period up until 2045.

Our experience of local plan examinations suggests that delays to the local plan-making process are inevitable. Even when considering the new fixed plan-making timescales, delays at examination stage will likely still occur. As such, should the Council choose to reduce the plan period in response to the revised NPPF, Gladman recommends that a plan period of at least 13 years is pursued. This would ensure that the minimum 10-year period is achieved, taking into account the compulsory 30-month plan making period, the potential for a six-month extension to the examination process permitted under the legislation and any other delays that may arise.

Policy PM2(1)(b) of the NPPF explains 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". The Council should consider whether the plan period needs to be extended in order to facilitate the delivery of longer-term strategic sites.

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Meeting Housing Needs

The delivery of new housing to meet the needs of all residents across the borough is a critical issue that must be addressed through the emerging Local Plan. The NPPF is clear that the standard method should be used as the starting point in establishing the housing requirement for an area. Gladman notes that the most up-to-date local housing need figure for the authority, defined using the standard method, is 2,531 dwellings per annum. The planning practice guidance (PPG) sets out that there are some specific circumstances in which an alternative approach to the standard method could be justified. Gladman submits that in this case, an alternative approach to the standard method is not justified. As such, there is no reason for the Council not to plan for its housing need defined by the standard method.

Policy HO2(3) of the NPPF states:

> **"Housing requirement figures should:**
>
> **a. Reflect the extent to which the identified needs of the area can be accommodated over the plan period as a minimum, in accordance with policy S1; and**
>
> **b. Be higher than the overall figure identified in the local housing needs assessment where appropriate. This includes situations where a higher housing requirement is necessary to meet the needs of neighbouring areas, or to reflect growth ambitions linked to economic development or infrastructure investment."**

Gladman considers that the identified housing needs of the borough can be accommodated over the emerging plan period in accordance with Policy S1 of the NPPF. As a minimum, the Council should plan for its standard method figure and include provision for neighbouring areas if necessary. It is essential that any unmet need is included within the housing requirement, rather than treated as 'in addition to', to ensure that it is delivered.

Gladman submits that the Council should consider the merits of planning for higher growth. Further to the examples provided in Policy HO2(3) of the NPPF, the PPG sets out that an increase in the total housing figures included in a plan may need to be considered where it could help deliver the required number of affordable homes[1]. Therefore, the Council could choose to plan for a higher number than its local housing need figure to support the delivery of affordable housing. Gladman stresses that the standard method should only be considered the starting point for calculating the new Local Plan's housing requirement.

Gladman contends that the new Local Plan should make provision for more dwellings than the minimum housing requirement for the plan period. It is essential that flexibility is built into the emerging Local Plan to ensure the Council is able to respond positively to changes in circumstances over the plan period. A housing land supply buffer of 10-20% is generally considered suitable to mitigate against delays in delivery as a result of changes in the planning and/or economic context. The housing land supply buffer should be flexible with a diverse

[1] PPG Reference ID: 2a-024-20190220

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range of components to positively respond to delayed delivery and changes in the planning and/or economic context. Furthermore, Gladman recommends the application of a non-implementation rate to ensure the overall provision figure is robust and the minimum housing requirement for the plan period is met in full.

The purpose of the emerging Local Plan is to identify sufficient sites to meet the housing requirement in full. Therefore, Gladman recommends that the Council allocates sufficient sites of all sizes instead of relying on windfalls to provide greater certainty in meeting its minimum overall housing requirement over the plan period. Additional site allocations would help ensure identified housing needs are met in full. Critically, the deliverability of the allocations would be tested by an inspector at examination to ensure they are deliverable over the plan period.

If the Council proposes to carry forward any allocations that have not come forward for development as yet, Gladman submits that robust evidence must be provided to demonstrate their deliverability.

The delivery of dwellings should be balanced throughout the plan period. Significant over-delivery in the early years can place pressure on infrastructure whilst an over-reliance on large strategic sites in the later years can lead to plans failing to deliver their housing requirement and local housing needs remaining unmet for a prolonged period of time. As such, in order to maintain regular housing delivery over the plan period, the Council should allocate a varied mix of sites.

Settlement Hierarchy

Gladman supports the establishment of a settlement hierarchy for the borough, as it can help inform the spatial distribution of development, the approach to site allocations and the definition of settlement boundaries. A robust settlement hierarchy allows for housing growth to be directed across the borough to all appropriate settlements. Gladman agrees with the Council that the existing settlement hierarchy should be reviewed to establish its effectiveness for the emerging plan period. The Council should consider how new residential developments can help to enhance the role, function and sustainability of settlements, including by maintaining and enhancing the vitality and viability of existing facilities and services, providing new local amenities and delivering improved infrastructure.

Spatial Distribution of Development

The Council rightly acknowledges that a range of factors will influence the spatial distribution of development. In order to meet the borough's identified housing needs, Gladman agrees with the Council that a combination of growth options may be required. Gladman submits that the primary growth strategy should be to direct new housing to the edge of towns and villages. The settlement hierarchy should be used to direct housing growth across the borough, with the level of growth allocated to a settlement being proportionate to its size, role and sustainability. Based on the existing settlement hierarchy, Gladman considers that the Principal Towns, Key Service Centres and Local Service Centres should accommodate housing growth over the emerging plan period.

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Green Belt

Gladman supports the Council undertaking a borough-wide Green Belt Assessment to identify Grey Belt land and inform any potential alterations to Green Belt boundaries. Critically, the assessment should be conducted in accordance with Annex E of the NPPF. The Council should determine whether exceptional circumstances exist to justify the release of Green Belt land for housing growth in line with Policy GB3(1) of the NPPF. Notably, Policy GB3(4) explains:

> **"Where a development plan's spatial strategy has identified suitable land around well-connected stations for development, exceptional circumstances do not need to be demonstrated to justify altering Green Belt boundaries."**

If the release of Green Belt land is required to meet development needs, the sequential approach should be followed in accordance with Policy GB4(1)(d)(i) of the NPPF.

Strategic Green Gaps

Gladman submits that the Council should review the boundaries of the Strategic Green Gaps to ascertain whether there is scope to allocate land for new homes without undermining their function. Whilst the Strategic Green Gaps play an important role, their function should be balanced against the requirement to meet the borough's identified housing needs in full. Given that the Strategic Green Gaps represent a significant policy constraint, the Council should ensure that their extent and boundaries are robustly evidenced so that land capable of accommodating sustainable development is not unnecessarily constrained.

Development in the Countryside

Gladman encourages the Council to develop a flexible and permissive countryside policy that allows sustainable residential development to come forward outside of defined built-up areas on greenfield sites. This policy approach would allow sustainable windfall development to come forward to help meet the borough's housing requirement. Furthermore, the Council would be able address housing land supply shortfalls without the need to depart from the provisions of the emerging Local Plan. Critically, the Council would still have the flexibility to refuse a scheme if it was considered to be unsustainable. Overall, this policy approach would allow the Council to retain more control over where development is located in the borough.

Policy HOU5 (Residential Windfall Development in the Countryside) of the adopted Ashford Local Plan 2030 provides a good example of how this can be implemented in practice. The policy states, "proposals for residential development adjoining or close to the existing built up confines of the following settlements will be acceptable: [...] Providing that each of the following criteria is met:". In addition, Policy 6 (Development on Unallocated Sites) of the County Durham Plan provides a further example. The policy states:

> **"The development of sites which are not allocated in the Plan or in a Neighbourhood Plan which are either (i) within the built-up area; or (ii) outside the built-up area (except where a settlement boundary has been defined in a neighbourhood plan) but well-related to a settlement, will be**

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permitted provided the proposal accords with all relevant development plan policies and:".

Brownfield Land

Gladman submits that there should not be an over-reliance on brownfield development and that the capacity of brownfield sites should not be overestimated. Although Gladman recognises the important role brownfield development plays in delivering much-needed housing, it must be noted that the viability of brownfield sites is more challenging, due to issues such as remediation costs, and can result in less affordable housing provision. Furthermore, brownfield sites are often more suited to being developed into high-density flatted development with typically one or two bedrooms per apartment. Therefore, Gladman stresses that an appropriate balance should be struck between brownfield and greenfield development so that the varied housing needs in the borough can be met in full.

Design

The National Design Guide, the National Model Design Code and the NPPF set out the key principles and characteristics for creating beautiful, high-quality and sustainable places. Gladman endorses this approach to creating healthy, safe, green, environmentally responsive, sustainable, distinctive and beautiful places and actively encourages a joined-up and coordinated approach between key disciplines, particularly landscape, ecology, drainage and masterplanning, in close liaison with key stakeholders. A range of disciplines across different sectors should be involved at an early stage to generate ideas, interventions and solutions to help shape future development.

Public Open Space

Well-designed open space supports an active lifestyle by creating safe, attractive and accessible environments that encourage walking, cycling and other forms of activity. Connected networks of footpaths, cycle routes and green corridors can help reduce reliance on cars, promote sustainable modes of travel and improve wellbeing. Well-planned open spaces contribute not only to healthier communities but also to more sustainable, adaptable and environmentally resilient places.

Sustainable Transport Methods and Active Travel

Residential schemes should deliver a comprehensive package of pedestrian and cycle infrastructure that promotes sustainable travel choices and reduces dependence on private vehicles. This should include safe, direct and attractive walking and cycling routes that are well connected to facilities and services. Residential schemes can promote healthier lifestyles and contribute to wider environmental and sustainability objectives.

Energy Performance and Renewable Energy

Developments should be designed to meet energy performance and efficiency targets through a fabric-first approach to construction, with the aim of reducing energy demand and associated carbon dioxide emissions. Renewable energy technologies will be considered at the detailed design stage to support the transition to a low-carbon future.

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Climate Change

It is acknowledged that the planning system has an important role to play in tackling the effects of climate change. In this respect, the overarching environmental objective of sustainable development cited in paragraph 17 of the NPPF highlights how the planning system should help to mitigate and adapt to climate change and support the transition to a low-carbon economy. This objective filters through to other elements of the Framework, including Chapter 5 that deals specifically with meeting the challenge of climate change. The NPPF states that the objective of the policies in Chapter 5 is to:

> **"support the transition to net zero by 2050 and to shape places in ways which are more resilient to the effects of climate change. It does this by setting out policies to shape places in ways that contribute to radical reductions in greenhouse gas emissions and adapt to the full range of current and potential impacts of climate change, by minimising vulnerability and improving resilience."**

Gladman recognises the increasing importance of addressing climate change and promotes sustainable housing developments to help mitigate its impacts. The Council should continue to take account of climate change in its plan-making, including any updates to guidance in relation to the Framework and PPG. It is important to recognise that mitigating and adapting to climate change must also be compatible with other important objectives for the planning system, including the requirement to boost housing delivery and build a strong, effective economy.

The Council declared a climate emergency in May 2019. Gladman's land interests can deliver numerous environmental benefits to assist the Council in meeting its climate-related goals.

Natural and Historic Environment

The conservation and enhancement of the natural and historic environments are key aims of the NPPF, as set out within Chapters 19 and 20. Local plans should outline positive strategies for enjoyment and conservation.

A proportionate approach should be utilised to ensure that suitable protective measures are implemented and that policies do not exaggerate the importance of assets to the detriment of other aspects of the Local Plan, for example by restricting otherwise sustainable development sites.

Economic Development

Gladman supports the economic growth aspirations of the Council. The delivery of new housing has a key role to play in fostering growth and supporting employment and investment through both direct and indirect effects.

General Comments

The emerging Local Plan should not repeat or conflict with national policy. Policy PM6(1)(c) of the NPPF states that plans should "not include policies which duplicate, substantively restate

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or are inconsistent with the content of national decision-making policies, unless directed by other policies in this Framework". In addition, Policy PM13(1)(b) of the NPPF explains that quantitative standards set through development plan policies should not cover matters that are already addressed by the Building Regulations, except in relation to accessibility standards, water efficiency and energy efficiency. The policy outlines that where standards are proposed beyond the requirements of the Building Regulations for water efficiency and energy efficiency, these should be justified and robustly evidenced.

Policy N1(2) of the NPPF states:

> **"Development plans should only set local standards for biodiversity net gain which are in excess of the statutory net gain requirement where this is for specific site allocations, and is fully justified and deliverable. Local standards should not extend to categories of development which are exempt from statutory biodiversity net gain."**

Throughout its preparation, the emerging Local Plan should be kept under constant review to ensure that it remains consistent with any changes to national planning policy and guidance.

Conclusion

Gladman looks forward to further engagement with the Council on the emerging Local Plan and will continue to engage in future consultations during the plan-making process.

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