01 September 2026

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

By email

Dear Strategic Planning Team,

NEW CHESHIRE EAST LOCAL PLAN – SCOPING CONSULTATION

Manchester Airport (MA) greatly welcomes the opportunity to contribute to the scoping consultation for your new Local Plan. Our representations regarding Manchester Airport are set out below under the relevant subheadings used in the Scoping Report.

About Manchester Airport

Manchester Airport is a strategically important component of the UK's infrastructure network and serves as the UK's global gateway in the North. It is the largest airport outside of London and third largest in the UK, handling 32.1 million passengers in 2025 and 95,000 tonnes of cargo. With 50 airlines operating to around 200 destinations, Manchester Airport provides the North with valuable international connectivity and crucial links to overseas markets. As such Manchester Airport is a major asset and engine of economic growth. Operations annually generate £6.5 billion to the UK economy, combined with the connectivity benefits of the airport which are valued at £4.4 billion.

Manchester Airport is also a major regional transport hub and public transport interchange with rail, bus, coach and Metrolink facilities all located on site. This makes Manchester Airport a strategically significant location in terms of its economic contribution, excellent transport connections and opportunities for growth.

Manchester Airport therefore has a significant impact and influence on Cheshire East in terms of its economic contribution to the borough (such as economic prosperity and employment opportunities) and opportunities for transport connectivity, locally, regionally and internationally.

While the majority of the Airport lies within Manchester City Council's jurisdiction, parts of the Airport's current Operational Area and land ownership lie within Cheshire East, and ongoing planning policy protection is required to ensure that the Airport's operational safety, efficiency, future development and growth are not compromised. It will be important to achieve an appropriate balance between these factors when formulating policy for the new Local Plan.

We are therefore extremely encouraged by the recognition that has already been given to Manchester Airport in the scoping consultation and trust that our comments are helpful to enable you to build on this.

Section 3. Context for the new Local Plan

National aviation policy

Paragraph 3.1 recognises that the new Local Plan must accord with national policy. This should include the most up to date Government aviation policy. The growth in UK aviation is supported through a framework of national policy that seeks to promote the growth and benefits of air transport whilst managing and mitigating the environmental effects. The operation and future development of Manchester Airport is wholly aligned with this, helping to deliver existing and emerging national aviation policy. Ensuring a balance between the economic, social, and environmental impacts of the UK aviation sector has been consistent in Government policies encouraging airports to make best use of their existing capacity.

The principal statements of national aviation policy are:

- Aviation Policy Framework (2013): This is the principal statement of national aviation policy. The economic benefits are recognised, and growth is supported whilst balancing environmental effects including climate change, aircraft noise and local air quality. Airports are encouraged to prepare 'masterplans' that set out how national policy can be applied at an individual airport level (see further detail below). The Policy Framework also makes it clear that the future development of the airport should be transparently considered in the preparation of Local Plans and contribute to the plans of others. In respect of noise, the Framework states an objective to limit and where possible reduce the number of people in the UK significantly affected by aircraft noise. It supports the ICAO's 'balanced' approach' to aircraft noise management and identifies land use planning and management as one of the four principal tools.

- Beyond the horizon: The future of UK aviation – making best use of existing runways (2018): This encourages and supports airports beyond London Heathrow to make the best use of their existing runways subject to local environmental issues being addressed.

- Aviation 2050: the future of UK Aviation (2018)

- Flightpath to the Future (2022): This reiterates that UK airports play a critical role in global and domestic connectivity and that sustainable growth in airport capacity continues to be supported where it is justified, and where it can be delivered within the Government's environmental obligations.

Other relevant national policy considerations include the Northern Growth Strategy (NGS) (2026) which was included in the announcement of Northern Powerhouse Rail (NPR) in January 2026. It is being developed to capitalise on the North's leading industrial sectors and unlock economic and investment opportunities in a Northern Growth Corridor. The NGS is Government's economic plan to boost growth in the North through major transport investment (including a £45 billion commitment to NPR, £10.4 billion investment in local transport and the £11 billion Transpennine Route upgrade already underway), city-region regeneration, skills development, business innovation, and strengthened devolution. It is set out in two core documents: *Northern Growth Strategy: Case for Change (January 2026)*

Northern Growth Strategy: Case for change - GOV.UK and *Northern Growth Strategy: Next Steps (March 2026)* Northern Growth Strategy: Next Steps - GOV.UK. The overall objective is to close long-standing regional productivity gaps and support the North's contribution to the UK economy. It is a collaborative effort involving the Government, local authorities, and businesses to create a more productive and resilient economy in the North. The economic context for your emerging Local Plan would be strengthened by drawing on and aligning with this wider economic plan for the North, ensuring that its contribution to Northern growth is appropriately recognised.

Manchester Airport 'masterplan' - the Sustainable Development Plan

The 'masterplan' for Manchester Airport – whose preparation is encouraged by the Aviation Policy Framework referenced above – is known as the Sustainable Development Plan (SDP). We strongly welcome your acknowledgment later in the scoping consultation (paragraph 5.95) that the Manchester Airport Sustainable Development Plan (SDP) will form part of the evidence base used to inform preparation of the Local Plan.

The Airport has a long history of preparing development plans / masterplans that publicly and clearly set out the airport's current and future land use requirements. The SDP defines the long-term ambition for the Airport and sets out the strategic context and approach that we intend to take for the Airport's future operation and development. It details where growth will occur and how we will manage and mitigate (environmentally) and exploit (economically and socially) the effects of that growth.

The current version of our SDP was published in 2016 (Sustainable Development Plan | Manchester Airport). This has been recently updated, and a draft new SDP will be consulted upon in September 2026 with a final version published around the turn of the year. The new Local Plan should therefore have due regard to the new Manchester Airport SDP that is being brought forward.

Economic growth (3.16)

Increasing economic growth and unlocking investment sits at the heart of the Government's planning reforms and ambitions for a growth-enabling planning system. Investment in economic infrastructure, including airports, will be key to transforming the UK economy. Airports are critical national infrastructure assets and vital engines of economic growth that make a substantial contribution to regional and national economic performance. As such, we urge you to give significant weight within the Local Plan to the economic contribution of Manchester Airport to Cheshire East and its enabling role in driving economic growth. Reference to the Airport as a driver of economic activity is absent in paragraph 3.16 of the Scoping Report and this should be corrected at the next stage of plan-making.

Manchester Airport supports the efficient movement of people and goods, underpinning supply chains, trade flows, and business connectivity across multiple sectors of the economy. Manchester Airport also plays a vital role in enabling international freight and logistics operations. Air freight provides a time-critical mode of transport for high value, perishable, and advanced manufactured goods, supporting regional and national distribution networks.

In terms of the economic contribution of Manchester Airport to Cheshire East, Manchester Airport operations annually generate some £214 million in GVA to Cheshire East. The

connectivity benefits of Manchester Airport, including gains in tourism, business productivity and inward investment represent a further £241 million. This represents a total value of £455 million annually for the Cheshire East economy.

Manchester Airport is also one of the largest employment sites in the North West, with 20,400 people working in over 140 on-site businesses. Most airport employees live in the local area, with around 70% living in Greater Manchester or Cheshire, and with 88% living in the North West region. The Airport also supports employment and economic activity in the wider supply chain, across the local area, the North and throughout the UK. Our most recent staff employment survey undertaken in 2025 shows that approximately 1,247 airport staff live in Cheshire East, particularly in the towns of Wilmslow, Knutsford and Macclesfield.

Given these functions, it is important for Manchester Airport to be recognised within the context of your Local Plan's economic policies and associated evidence base to ensure that the benefits of the Airport's substantial economic contribution to the borough are realised. Alongside this, it should be ensured that Local Plan policy enables planning decisions to give sufficient weight to the economic benefits of Manchester Airport when considering the Airport's future infrastructure requirements and affords appropriate support for Manchester Airport's operation and development. It is essential to safeguard the Airport's land for airport-related development and associated employment and logistics infrastructure to accommodate the Airport's long-term growth.

Section 4. Baseline information and spatial portrait

The location of Manchester Airport should be emphasised within the spatial portrait of the borough, along with Manchester Airport's role as the primary international gateway for the North.

Connectivity (4.5)

Paragraph 4.5 of the scoping consultation recognises the location of Manchester Airport on the edge of the borough and that the Airport further enhances the area's connectivity, which we welcome. Good transport links are crucial to supporting sustainable communities and economic growth. As a key transport hub and international gateway, Manchester Airport plays a major role in boosting the region's connectivity and in doing so, meeting the economic and social needs of Cheshire East residents.

Enhancing accessibility across the borough and improving transport links to Manchester Airport should therefore be promoted as a priority in the new Local Plan. Supporting such improvements will enable the borough to fully capitalise on the Airport's international connections and unlock the economic benefits that can help to deliver further growth and development within Cheshire East.

Manchester Airport has a long-standing commitment to improving connectivity and sustainable travel and, through our partnership working, to support the delivery of the region's economic and transport priorities. At the heart of our growth strategy is the need to provide a transport network that is efficient, convenient, reliable and safe. Our policies, targets and objectives are set out in our Surface Access Plan, which forms part of the current Manchester Airport Sustainable Development Plan (2016), shortly to be replaced by an updated Plan, and in our Staff Travel Plan.

Economic contribution (4.6)

Please refer to our comments made under the 'economic growth' section above. The new Local Plan should recognise the Airport's role in the local and regional economy and its economic contribution to the borough, including as a major employer. Reference to the Airport in this regard is absent in paragraphs 4.6-4.10 of the Scoping Report, and this should be corrected at the next stage of plan-making. We can assist in providing the latest economic estimates of the Airport's economic footprint, GVA contribution and employment figures to support the Local Plan evidence base.

Section 5. Scope of the new Local Plan

Creating a vision and objectives (5.2 – 5.4)

We recommend that the Vision for Cheshire East includes recognition of Manchester Airport as the primary international gateway for the North and the opportunity to leverage the benefits of its location and its operations for the borough.

We also recommend that having accessible, frequent and reliable sustainable transport choices should form a fundamental aspect of the Vision for the borough.

Planning for growth (5.5 – 5.14)

We welcome paragraph 5.6 of the Scoping Report on supporting sustainable economic growth. As per our comments made under the 'economic growth' and 'economic contribution' sections above, the Local Plan should fully reflect the role of Manchester Airport and its economic contribution and international connectivity in the planning for sustainable economic growth and thereby ensure that it plans positively for airport-related development and safeguards essential connectivity.

Please note the weight given within the new NPPF (August 2026) policy TR1(1)(e) to *"providing for any transport facilities that need to be located in the area, or for their necessary expansion or adaptation, and the infrastructure and wider development required to support them"* and the direct reference to this including airports, freight interchanges and public transport hubs.

Promoting sustainable transport and a vision-led approach to planning for transport is fundamental to facilitating the conditions for long-term economic growth.

Green Belt (5.15 - 5.18)

We welcome a Green Belt Assessment being undertaken (paragraph 5.18 of the Scoping Report) and look forward to reviewing its conclusions, including the identification of grey belt land, in due course.

Development in settlements / development in the countryside (5.27 – 5.29)

It is important that the Local Plan draws appropriate 'settlement' boundaries given the new NPPF's policy S4 and S5 relating to how development inside/outside settlement boundaries should be treated.

The extent of the Airport within Cheshire East does not ordinarily form part of a 'settlement' but is instead a separate, previously developed and actively used site that should be subject to a standalone policy guiding its use and future development (as reflected in more detailed comments further below). It should not be included within a 'settlement' boundary subject to NPPF's policy S4 but equally should not be considered outside a 'settlement' and subject to NPPF policy S5.

Housing (5.30 - 5.64)

We appreciate that the provision of sufficient, high-quality housing is a key function of the Local Plan.

For any proposed housing allocations close to Manchester Airport, road access arrangements should consider access to the airport to avoid undue pressure on the existing road network and to safeguard the operation and planned growth of the Airport. Any policy that is designed to increase housing supply in the borough is likely to bring more housing and social infrastructure closer to Manchester Airport's operation. The implications of this can be significant and we therefore wish to emphasise the importance of ensuring that residential development near the Airport is effectively controlled and mitigated, especially within areas affected by aircraft noise and within the Airport's safeguarded area, each of which are outlined immediately below (and further on in our comments on the 'transport and infrastructure' section of the Scoping Report).

Whilst noise reduction, mitigation, and operational management is constantly undertaken at airports and by the aviation industry, the land use planning system has, through poor policy advice and decision making, led to increases in housing (or other noise sensitive development) being allowed around airports, which has increased the number of people exposed to aircraft noise. This runs contrary to the Aviation Policy Framework's objective to *'limit and where possible reduce the number of people in the UK significantly affected by aircraft noise'*.

The aviation industry body *'Sustainable Aviation'* published its 'Quieter Road-map' in 2025 (SA_QuieterRoadmap_Report_Feb25.pdf) to identify means that the Aviation Policy Framework's objective could be achieved. A chapter is devoted to land use planning and the opportunity for the local plan-making process to contribute.

Preparation of the new Local Plan should also be informed by Manchester Airport's statutory Noise Action Plan (NAP). The UK's major airports are required by the Environmental Noise (England) Regulations 2006 to prepare a Noise Action Plan (NAP) that sets out the approach and the measures to be taken to manage and control aircraft noise and community disturbance. The current Manchester Airport Noise Action Plan (2024-2028) was adopted by Defra in December 2024 (Noise Action Plan 2024-2028 - Manchester Airport) and a summary of its contents will be contained in the draft Airport Sustainable Development Plan. The NAP includes details of noise-related targets and commitments by the Airport and reports on the progress that has been made over recent years. Of relevance to plan making, the NAP sets out a long-term aim to *'limit and reduce where possible, the number of people affected by noise because of the airport's operation and development'*. Preventing new housing being built close to the Airport can be a key contributor to this objective.

Taking account of the NPPF's policy P1 (specifically part 1c) this constraint should be recognised in the choice of sites selected by the Council for new housing or, where

allocations close to the airport are deemed absolutely necessary, within the site-specific requirements of allocations to avoid aircraft noise from giving rise to significant adverse impacts on health and quality of life and to adequately mitigate and minimise adverse impacts on health and quality of life. No site allocations for residential development should be made within areas that are subject to aircraft noise levels at or above the Significant Observed Adverse Effect Level (SOAEL).

The location and characteristics of a development can have significant implications for aviation safety. Therefore, when considering the type, scale and design of development on allocated sites that fall within Manchester Airport's safeguarded area, consideration of the regulatory aerodrome safeguarding requirements, consultation procedures, and any potential impacts on aircraft safety must be addressed in accordance with the NPPF's policy P1 (specifically part 1c). Due regard must be given to the legislative provisions set out in the Town and Country Planning (Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas) Direction 2002 (ODPM Circular 1/2003) (or any subsequent replacement). This is to ensure that the safe operation of aircraft and air traffic control procedures is not compromised by development that causes, inter alia: an obstacle, an increased bird strike risk, interference with radar or an ocular hazard through glint and glare or lighting.

Employment and economy (5.65 - 5.69)

To align with the Government's pro-growth policy, we would welcome a policy in the new Local Plan that strengthens support for growing businesses and long-term economic growth. Such policy would need to allow adequate flexibility to respond to changing conditions and market demands. This would align with the new NPPF policy E1 (Providing the conditions for long-term economic growth) which airports should be seen in the context of. Due regard also needs to be made to NPPF policy TR1 (1)(e) that supports planning for the needs of transport infrastructure, which specifically includes airports, to facilitate economic growth.

As referred to earlier, Manchester Airport is a nationally significant infrastructure asset and key driver of economic growth with a significant GVA contribution to Cheshire East. The Airport is also a major employment area, with circa 20,400 people working in over 140 on-site businesses, as well as supporting employment and economic activity in the wider supply chain. As such, there is considerable potential for the Airport's growth to contribute to the borough's economic vision and strategy. The Local Plan should acknowledge this and afford strong support for the Airport's sustainable economic growth – it is currently absent from the list of 'major employers in paragraph 5.65 of the Scoping Report. The growth of Manchester Airport with its connectivity to local and international markets will contribute to the creation of more jobs, economic activity and supply chain opportunities that will serve to enhance economic growth within Cheshire East.

Recent research on the impact of Manchester Airport development as a driver of economic growth, 25 years on from the opening of Runway 2, has been undertaken by Metro Dynamics. Their report, *"A Route to Growth for the North - 25 Years of Manchester Airport's Second Runway Report (August 2026)'* (aroutetogrowthreportman2026.pdf) provides a succinct up-to-date summary of Manchester Airport's contribution to wider economic growth, evidencing how the Airport's infrastructure investments and expansion have shaped the regional economy. We would encourage reference to this within the Local Plan evidence base.

Establishing a pipeline of adaptable employment use land supply at the plan-making stage is essential. These allocations should be informed by strategic evidence of the long-term needs, which provides greater certainty for local communities, businesses and investors.

We welcome the preparation of the Economic Development Needs Assessment and Employment Land Review, as stated in paragraph 5.69 of the Scoping Report. The future of Manchester Airport should be included within this Assessment and Review.

Transport and Infrastructure (5.91 - 5.95)

Sustainable transport connectivity

Ensuring that there is effective transport connectivity across Cheshire East and supporting improvements to the public transport, active travel, and strategic transport network between the borough and Manchester Airport should be a priority. Careful consideration of the public transport links to Manchester Airport will be required. The Airport's transport links are part of a wider network that is important for the overall connectivity and economic competitiveness of the region. Maintaining an effective, efficient and reliable transport network is hugely important for the Airport's further development as a major international gateway. Promoting transport measures and supporting improved accessibility to the Airport will therefore help to facilitate economic growth and development across Cheshire East.

Predictable and reliable accessibility and sustainable accessibility are key principles of the Airport's own surface access strategy as set out in the Manchester Airport SDP (both the 2016 adopted version and the soon to be launched consultation draft replacement). We recognise that in certain parts of the borough, residents cannot easily access Manchester Airport by public transport as air passengers or for travelling to work, and this can be a barrier to some residents from the area being able to access jobs and training opportunities. This may also prevent Cheshire East residents in the areas close to the Airport utilising our Ground Transport Interchange (the Station) to access local, regional and national transport connections.

Proposals for the new east-west rail route between Manchester and Liverpool (Northern Powerhouse Rail) announced by the Government in January 2026, including the development of a new station at Manchester Airport, would improve rail connectivity in the north of the borough and planning positively for the new NPR station at Manchester Airport should therefore be reflected in the new Local Plan. The Airport is also supportive of improved and faster rail connections from Crewe to Manchester via Manchester Airport. As well as public transport improvements to/from the Airport benefiting Cheshire East residents who work/could work at the Airport, these improvements could also benefit Cheshire East businesses, by attracting a workforce and customers from areas in the vicinity of the Airport outside of Cheshire East to work in the borough.

Manchester Airport is forecast to increase its passenger numbers significantly over the next 15-20 years. To support this level of activity, and the increased number of on-site jobs, an efficient and integrated transport network is crucial. Our ambition is to deliver a substantial shift in the proportion of passengers and staff using public transport to access the airport. Our target is to achieve 40% of passengers and 40% of staff using sustainable transport modes by the time the Airport is handling 50 million passengers per year, but with a long-term stretch target and ambition to achieve of 50% of staff using sustainable

transport. The achievement of these mode share targets will rely on a major shift in the reliability of rail services and the development of the rail network, along with the development of services and expansion of the wider public transport network, including buses.

The Local Plan will be an important part of the broader transport strategy framework needed to achieve this. It should be closely aligned with the Cheshire East Local Transport Plan (2026) which identifies *'Connecting with Manchester Airport'* as a key investment package in the LTP Investment Framework focussing on improving sustainable travel connections with Manchester Airport.

Transport planning

We support the vision-led approach to planning for transport, as set out in paragraph 5.93 of the Scoping Report. Airports themselves are not just elements of physical infrastructure; they function as significant multimodal transport hubs, major employment centres, catalysts for regional productivity and are economic growth generators in their own right. Manchester Airport must grow and develop in a sustainable and socially responsible way and planning holistically is essential to achieve this. Sustainable transport solutions are a fundamental part of this and must be considered at a very early stage of plan-making in consultation with key stakeholders.

We welcome the recognition in paragraph 5.93 of the Scoping Report of the need to make effective use of existing infrastructure and to plan for new infrastructure where necessary. NPPF policy TR1 requires the needs of transport infrastructure, including the adaptation and expansion of airports, to be fully considered in development plan preparation. The Local Plan should reflect this requirement by recognising and embedding the role of strategic infrastructure, including Manchester Airport, in supporting sustainable growth and creating well-connected places.

Policies relating to Manchester Airport

We strongly welcome your recognition within paragraph 5.94 of the Scoping Report of the need to include policies relating to Manchester Airport within the new Local Plan. Consideration of the Airport's operational needs and environmental impact is essential. Parts of Manchester Airport's Operational Area lie within Cheshire East, and policy is required to ensure that the Airport's operational safety, efficiency and future development are not compromised. It will be important to achieve an appropriate balance between these factors when formulating policy for the new Local Plan.

The Local Plan Strategy (2017) and Site Allocations and Development Policies Document (2022) contain several existing policies and other information relating to Manchester Airport that should form the basis of the emerging policy and detail within the new Local Plan. The key matters are as follows:

- **Supporting appropriate airport-related development** – Part of Manchester Airport's current Operational Area lies within Cheshire East, and the Airport therefore seeks to retain this designation in the new Local Plan. Policy must be included to reflect the types of development and uses that are permitted within the Operational Area. The current approach to development within the Airport's Operational Area as set out in SADPD Policy INF 4 and associated supporting text should be updated within the new

Local Plan to reflect current and anticipated future circumstances. We welcome the acknowledgement in paragraph 5.94 of the Scoping Report that this policy will be needed.

Regarding Manchester Airport's future development aspirations and land requirements, as the Airport continues to grow in response to the economic performance of both our region and the North, and as we plan for the future of the terminals and airfield to respond to our airline and customer needs, we will need to keep the extent of the Operational Area under review. Our primary focus will continue to be to make best use of our existing facilities and land, however, should it be necessary, we will explore the case and opportunity for limited expansion of the Operational Area (both within Cheshire East and outside the borough) based on an evidence-led approach.

- **Managing the impacts of aircraft noise** – The effect of aircraft noise upon the amenity of Cheshire East residents requires careful consideration in the planning process and development should be limited in certain affected areas. We therefore support the inclusion of current policy that controls development (residential and other noise sensitive development) in areas adversely affected by aircraft noise. SADPD Policy ENV 13 should therefore be carried over and updated within the new Local Plan to ensure technical accuracy and to reflect current best practice as well as the Airport's latest noise contours and statutory Noise Action Plan. This policy would ensure that development proposals near the airport is limited to those which are compatible with noise levels in the area and that development is capable of being occupied without undue nuisance from aircraft noise. We welcome the acknowledgement in paragraph 5.94 of the Scoping Report that this policy will be needed.

- **Ensuring that development does not compromise aviation safety through the process of Aerodrome Safeguarding** – Manchester Airport must be afforded policy protection to ensure that its operational safety, efficiency and future development are not compromised. This has implications for land and development within the borough and presents specific development issues that cannot be addressed by generic development management policies. SADPD Policy GEN 5 and associated supporting text should be retained and updated within the new Local Plan. We welcome the acknowledgement in paragraph 5.94 of the Scoping Report that this policy will be needed.

  Please note that Manchester Airport's safeguarded area has been updated since the adoption of the SADPD in 2022 and is now more extensive in its coverage due to the requirement to incorporate the safeguarding of current and possible future Instrument Flight Procedures (IFPs). We are happy to discuss the implications of this with you in more detail and would welcome the opportunity to work with you to draft an appropriate policy and supporting text that reflects the most current aerodrome safeguarding procedures, as the development of the new Local Plan progresses.

- **Control of development within Airport Public Safety Zones (PSZ)** – PSZ's are designated areas of land at the end of runways at the UK's major airports, within which development is restricted to control the number of people on the ground at risk of death or injury should an aircraft accident occur during take-off or landing. The policy objective is to prevent an increase in the number of people living, working or

congregating in these areas, and over time reducing this number as circumstances allow. SADPD Policy GEN 6 should be carried forward and updated within the new Local Plan. Reference to the need for this policy in the new Local Plan is absent from paragraph 5.94 of the Scoping Report and should be corrected at the next stage of plan-making.

- **'Off-airport' car parking** – In recognition of the off-airport parking market (i.e. parking for airport passengers not provided by the Airport itself) that is sustained in parts of the borough, SADPD Policy INF 5 and associated supporting text should be retained and updated within the new Local Plan. Reference to the need for this policy in the new Local Plan is absent from paragraph 5.94 of the Scoping Report and should be corrected at the next stage of plan-making.

As stated previously under Section 3, we strongly welcome the recognition in paragraph 5.95 of the Scoping Report that the Manchester Airport Sustainable Development Plan (SDP) will be used to inform preparation of the Local Plan. Our SDP contains detailed plans relating to the Airport's Strategic Context, Economy, Land Use, Surface Access, Environment and Community. We also welcome the compilation of the Infrastructure Issues and Context Report. Our response to this scoping consultation should be read alongside the information that we previously submitted to support preparation of the Infrastructure Issues and Context Report. We look forward to further collaborative working on the subsequent Infrastructure Delivery Plan.

Natural Environment (5.96 - 5.103)

We note that paragraph 5.99 of the Scoping Report suggests the potential for biodiversity net gain standards that exceed national minimum standards where they are justified and deliverable. There is a potential conflict here between delivering biodiversity net gain (BNG) near Manchester Airport and maintaining the safe operation of aircraft. Whilst a BNG target above the mandatory requirement is admirable, we ask that careful consideration is made to the potential implications of this from an aerodrome safeguarding perspective and the likely feasibility of achieving this for developments given that a significant area of the borough is within Manchester Airport's 13km bird hazard safeguarding zone.

Furthermore, the new NPPF Policy N1(2) states that *"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."* If the Council seeks to apply a higher BNG target to specific allocations close to the Airport we would welcome an early dialogue on whether this is practically achievable given the requirement for appropriate aerodrome safeguarding.

Pollution and contamination (5.109)

We welcome the acknowledgement in paragraph 5.109 of the aircraft noise impacts across parts of Cheshire East. As previously stated under the 'transport and infrastructure' section, the effect of aircraft noise upon health and quality of life requires careful consideration in the planning process and policy is required in the Local Plan to manage the impacts of aircraft noise and control development (residential and other noise-sensitive development) in areas adversely affected by aircraft noise.

SADPD Policy ENV 13 should therefore be carried over and updated within the new Local Plan to ensure technical accuracy and to reflect current best practice, the Airport's latest noise contours, and the statutory Noise Action Plan. This policy would ensure that development is limited to those which are compatible with noise levels in the area and that development is capable of being occupied without undue nuisance from aircraft noise.

Wider strategies (5.143)

Regarding the wider plans and strategies that will help to inform the new Local Plan as set out at paragraph 5.143 of the Scoping Report, we strongly recommend that you also take account of the Cheshire and Warrington Combined Authority's production of an Independent Economic Review.

We note that the Green Belt Assessment referenced in paragraph 5.18 of the Scoping Report is missing from the list of further evidence that is either in production or planned as set out in paragraph 5.145.

Thank you for the opportunity to contribute to this scoping consultation. We trust that our comments have been useful but please do not hesitate to contact us should you wish to discuss the matters raised in more detail. We look forward to collaborating with you further as the preparation of your new Local Plan progresses.

Yours sincerely