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August 24th, 2026

Dear Stewart House,

CHESHIRE EAST COUNCIL LOCAL PLAN SCOPING CONSULTATION - SUMMER 2026

The Campaign to Protect Rural England (CPRE) is celebrating its centenary this year. The organisation (originally named the Council for the Preservation of Rural England) was established to tackle creeping development into the countryside and poor design. We continue to work to those ends.

CPRE Cheshire Branch welcomes the opportunity to participate in the new Cheshire East Local Plan fast track process, although we earnestly hope that the speeded-up process does not result in any diminution in the roles that external stakeholders can play or in their views not receiving due consideration.

According to the Ministry of Housing, Communities and Local Government (MHCLG), the scoping consultation stage is about *‘inviting feedback from stakeholders on how to engage with them and what the plan should contain’*. This being the case, we will tackle these two aspects separately.

Requirements for engaging with stakeholders – not currently being met by Cheshire East Council

Local planning authorities are required by the MHCLG to have *“a well-defined community engagement strategy”* set out in their Project Initiation Document (<https://www.gov.uk/guidance/engaging-the-public-when-preparing-a-local-plan#community-engagement-principles>). This is to be a regularly updated ‘living document’. We would point out that entering ‘Project Initiation Document’ into the search engine of Cheshire East Council’s website yields no results. There is a generalized, outdated, ‘Customer Experience Strategy’, dated 2021-2024, but, in any event, it was not directed at the Local Plan. Also, the 2022 Statement of Community Involvement is out of date, referring to the Local Plan Strategy, the Site Allocations and Development Policies Document and the Minerals and Waste Plan as three separate documents when in fact they will all be one with the new Plan process. And, Active Travel England needs to be added to statutory consultees and Local Enterprise Partnerships removed.

Requirements regarding what the Local Plan should contain

The Town and Country Planning (Local Planning) (England) Regulation 2026 requires Local Plans to have:

- (a) A vision for the future of the local authority’s area. This must relate to the particular characteristics or circumstances of the local planning authority’s area and it may contain the authority’s aims and objectives showing how they intend to achieve their vision
- (b) No more than 10 measurable outcomes and
- (c) The date on which the plan is adopted or approved

The Chief Planner’s newsletter of June 4th, 2026 references the mandatory data standards for Local Plans that came into force on May 7th 2026 whereby *“communities, developers and planners will be able to see clearly, in one place, how plan making is progressing and how many homes each area is planning for”*. It records that whilst sustainability appraisals are no longer required Strategic Environmental Assessments are (<https://www.gov.uk/guidance/planning-guidance-letters-to-chief-planning-officers#section>).

Engaging with stakeholders – CPRE's view

It would appear that Cheshire East Council does not have a current community engagement strategy (see previous page). If that is in fact the case, then this situation must be rectified without delay.

That said, there is a community initiative for which CEC must be commended – the establishment of a Community Assembly. A general invitation was issued via CEC's website on June 24th for residents aged over 18 to put themselves forward to join a 'Community Voices' panel. This, it was explained, would allow members of the public to share their views and take part in open and constructive discussions that would *"help shape council services, priorities and decisions"*. There was an on-line initial survey but the first participative event was a meeting held at Congleton Town Hall on August 18th, attended by over 30 members of the public, who were invited to discuss the forthcoming Local Plan. Badged as a first meeting of the Community Assembly, it allowed Cheshire East the opportunity to acquaint members of the wider public with land use planning and for CEC to receive their initial feedback. The event was well staffed and well facilitated and feedback was logged. It remains to be seen if it will have any impact on decisions made.

As far as CPRE has been able to discern, the examination in public stage of the new Local Plan process will remain open to members of the public and interested organisations, ie. any individual or body making well argued submissions can hope to be invited to take part by the examination inspector.

What the Local Plan should contain – CPRE's view

The Local Plan is obliged to designate locations for the housing the government has told it to provide. CPRE acknowledges the need for many more genuinely affordable homes and much more social housing but we would make the point that the national over-arching target of one and a half million homes has never been justified. Also, we do not support the new standard method for distributing that figure. That said, we recognise that local authorities have no option but to comply with the figures they have been given and we offer our advice as to the most sustainable way to set about meeting the requirements.

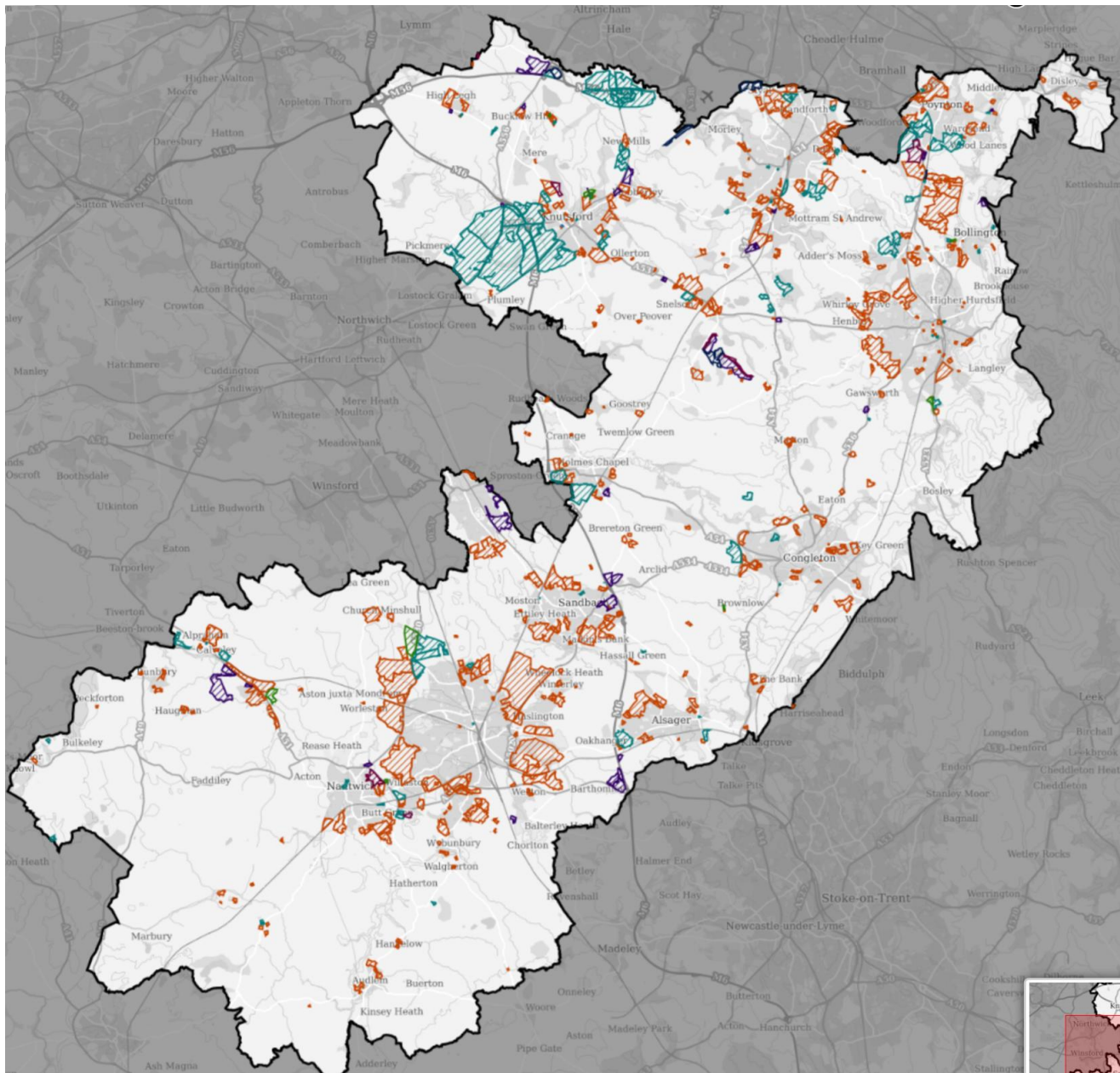
Strenuous efforts should be made to regenerate urban areas in need of renewal (preferably at a higher density) and to place as much new development as possible (not just housing) on previously developed land in order to protect agriculture/ the countryside. To achieve this, the following actions are required:

- The CEC brownfield register needs to be updated and the owners of suitable land and buildings need to be encouraged to bring them forward for redevelopment
- Master plans need to be drawn up, not just for the two main centres (Crewe and Macclesfield) but for the key service centres – to examine where any currently failing retail areas/premises might be re-designated for housing (or other purposes) and where to target regeneration
- A survey needs to be conducted of all industrial, commercial and business sites to determine whether any can be partially or wholly turned over to housing
- All 'made' Neighbourhood Plans should be analysed to determine whether or not there are any areas identified in them as being suitable for development that have not been developed
- Land safeguarded in the current CEC Local Plan needs to be reassessed. Where it is still regarded as suitable, it should be taken forward. That said, there are a number of exceptions which deserve re-determination, most notably the area known as the South Macclesfield Development Area – much of which covers an irreplaceable peat bog – Danes Moss. (N.B. Danes Moss has been chosen as a featured 'edgeland' by national CPRE for its 'On the Edge' campaign: <https://www.cprecheshire.org.uk/news/danes-moss-on-the-edge/>).

If the actions listed above were carried out, it would reduce reliance on plots that have come forward via the 2024 and 2026 'Call for sites' exercises. These are merely aspirations by landowners and developers. That is why it is so important for all of them to be thoroughly assessed by planners – who need to keep in mind the aesthetic qualities of landscapes, access to the countryside and nature for urban dwellers and where National Nature Reserves and wildlife sites are located (ref. Cheshire Wildlife Trust).

Call for sites: locations

Until the launch of this current consultation, it has not been possible to know where most of the proffered sites were located. An interactive map showing them has now been made available - without commentary. All it has is a key – orange for housing, deep green for mixed use development and purple for employment (<https://localplan.cheshireeast.gov.uk/site-submissions/housing-and-employment-sites>). It is notable that the majority of sites put forward are Green Belt and Green Gap 'blind'.

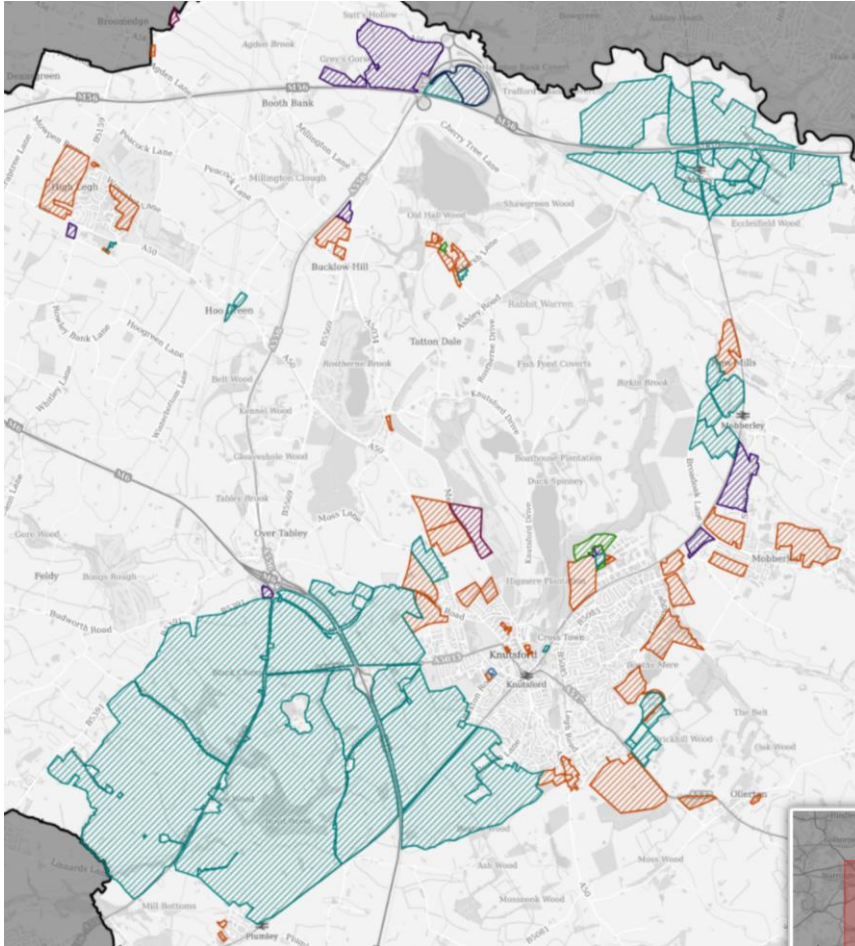


Map of site submissions from Cheshire East Council website

On the 'Call for sites FAQs' page there is a promise that consultation will take place *"on options for accommodating development needs"* at the 'plan, content and evidence' stage of the Local Plan process, but it is unclear from this statement whether or not the Council's detailed assessment of all the sites will be made available then (<https://localplan.cheshireeast.gov.uk/call-sites/call-sites-faqs>).

It is essential, before the Local Plan proceeds any further, that a professional analysis of the proposed development sites is published and consulted upon. (According to the most recent strategic planning update on the CEC website, dated April 2026, *"The council will be carrying out a Green Belt assessment during 2026"* but there is no information about a 'Call for sites' assessment). There needs to be clear explanations as to why it is considered appropriate to consider removing Green Belt sites from their G.B. designation. Ideally, the Green Belt should be regarded as a suitable candidate for environmental enhancement.

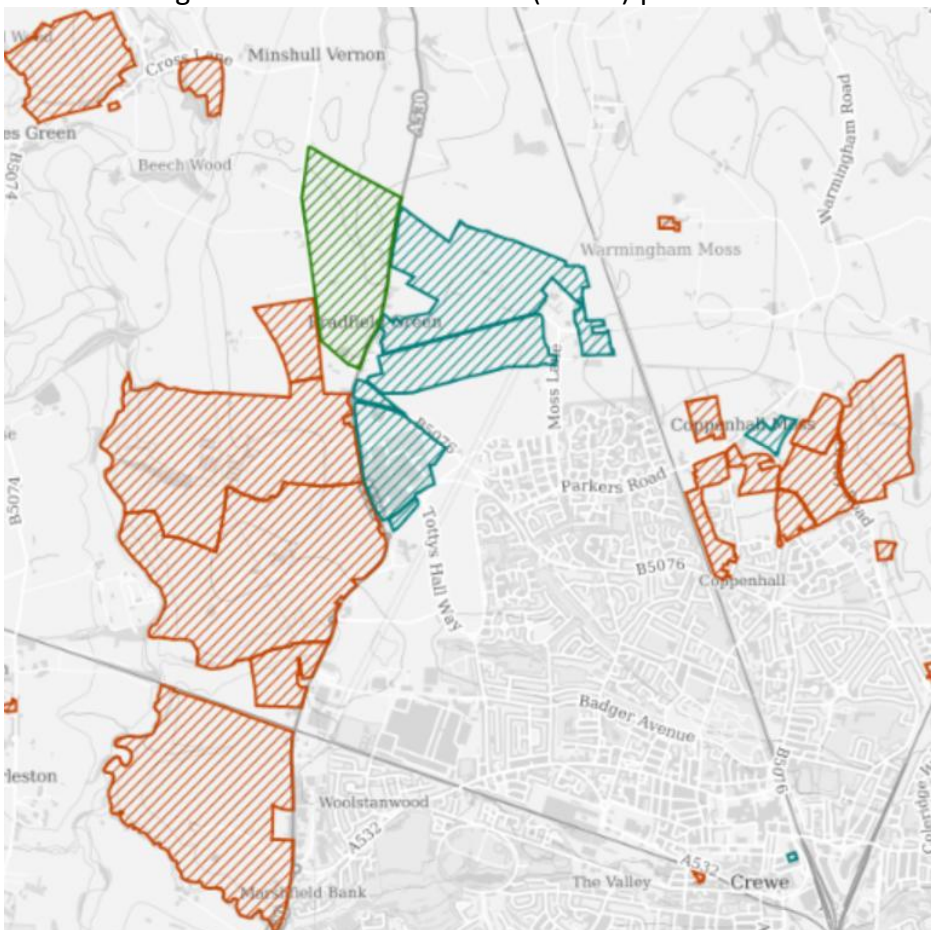
CPRE notes that the largest application for inclusion in the Local Plan, is one for mixed use development in the Green Belt in the area between Pickmere, Plumley and Knutsford, although there are two more significant ones at Ashley (also Green Belt) – a site which would join up with Hale in Trafford (below) ...



Knutsford, Mobberley, Ashley

The area to the west of Knutsford and east of the M6 falls partly within Green Belt pockets KNO5, KNO4 and KNO2 in the Green Belt Assessment that was carried out for the current Cheshire East Local Plan by Arup. All three were deemed to make a 'significant contribution' to Green Belt purposes. An area to the west of Mobberley station is also targeted for mixed use development. This was not assessed as part of the previous G.B. exercise, as neither was the area around Ashley. (Only the environs of the bigger CEC settlements were subject to G.B. assessment).

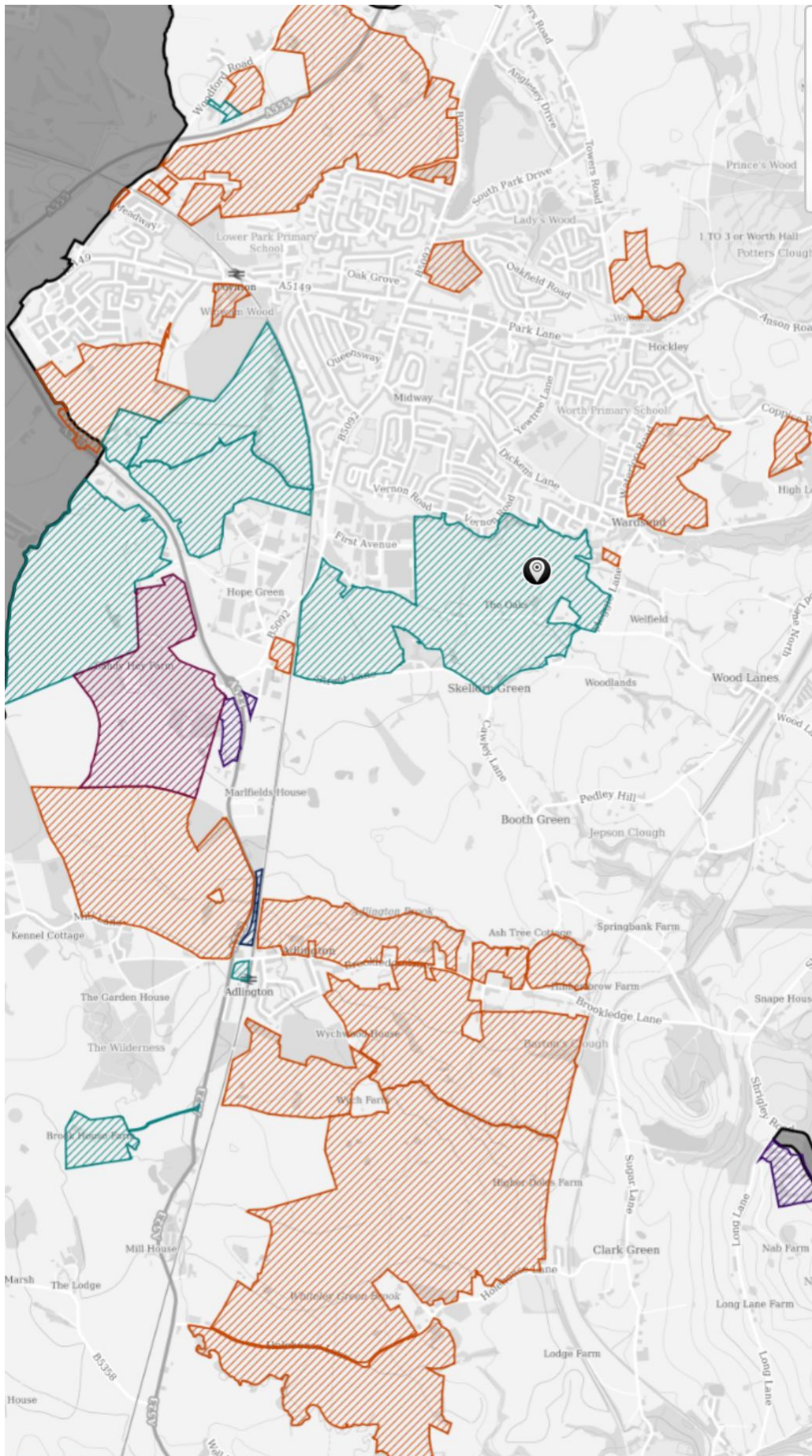
... and at Leighton north west of Crewe (below)q



North West of Crewe and west of the West Coast Main Line

The only Green Belt near Crewe is to the south east of the town and Green Gap policies apply to the south west (between Crewe and Nantwich), east and south. The unbuilt areas to the north west have no specific policies seeking to protect them from inappropriate development.

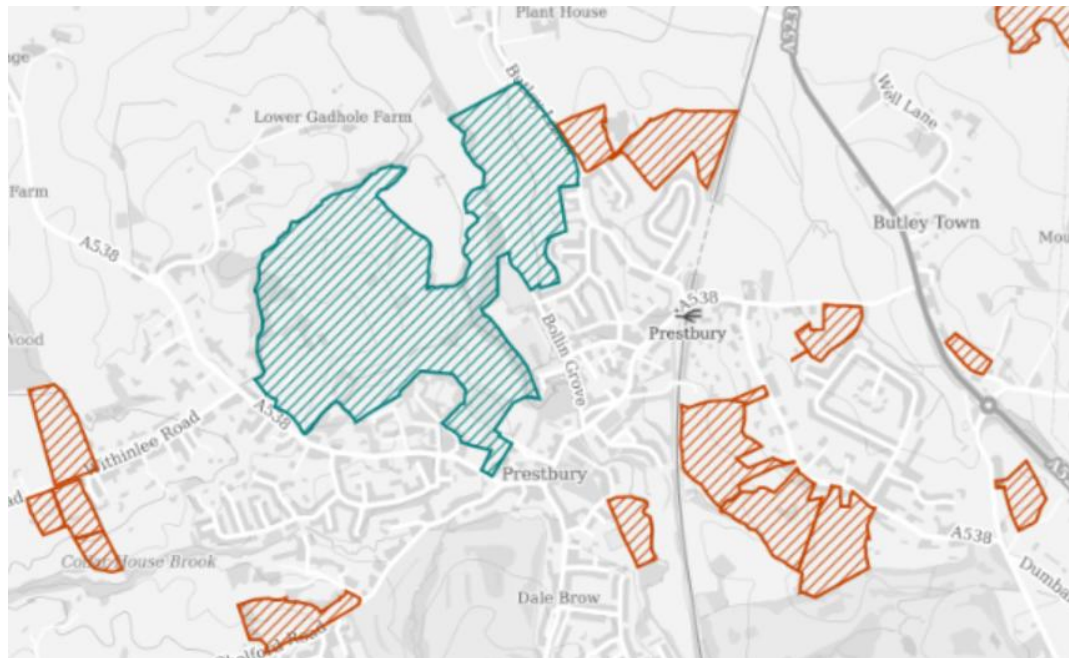
The largest single housing proposal in the Green Belt is in the north east of the borough between Poynton and Bollington around Adlington (in orange), an area where there is also a significant application for mixed use development. This is the land put forward by Belport as a potential site for a New Town. It is to be earnestly hoped that this proposal, which CEC rejected, will not be endorsed through the back door.



Poynton and Adlington

The area in Poynton to the west of the railway line and north of Hope Green (in green) is proposed for mixed use. It falls within Green Belt pockets PYO9, PYO8, PYO7, PYO6 and PYO5 as rated by Arup in the Green Belt Assessment carried out for the current Cheshire East Local Plan. All were rated as making a 'significant contribution' to Green Belt purposes. The south Poynton/ north Adlington area proposed for mixed use falls within Green Belt pockets PY22, PY23, PY24 and PY25. PY23 and PY25 were also rated as making a 'significant contribution'. The bulk of Adlington was not assessed in the Arup G.B. exercise which focused on land around centres.

Another significant mixed use development proposal appears in the site proposals map to the north of the village of Prestbury, which is also impacted with a number of housing development propositions.

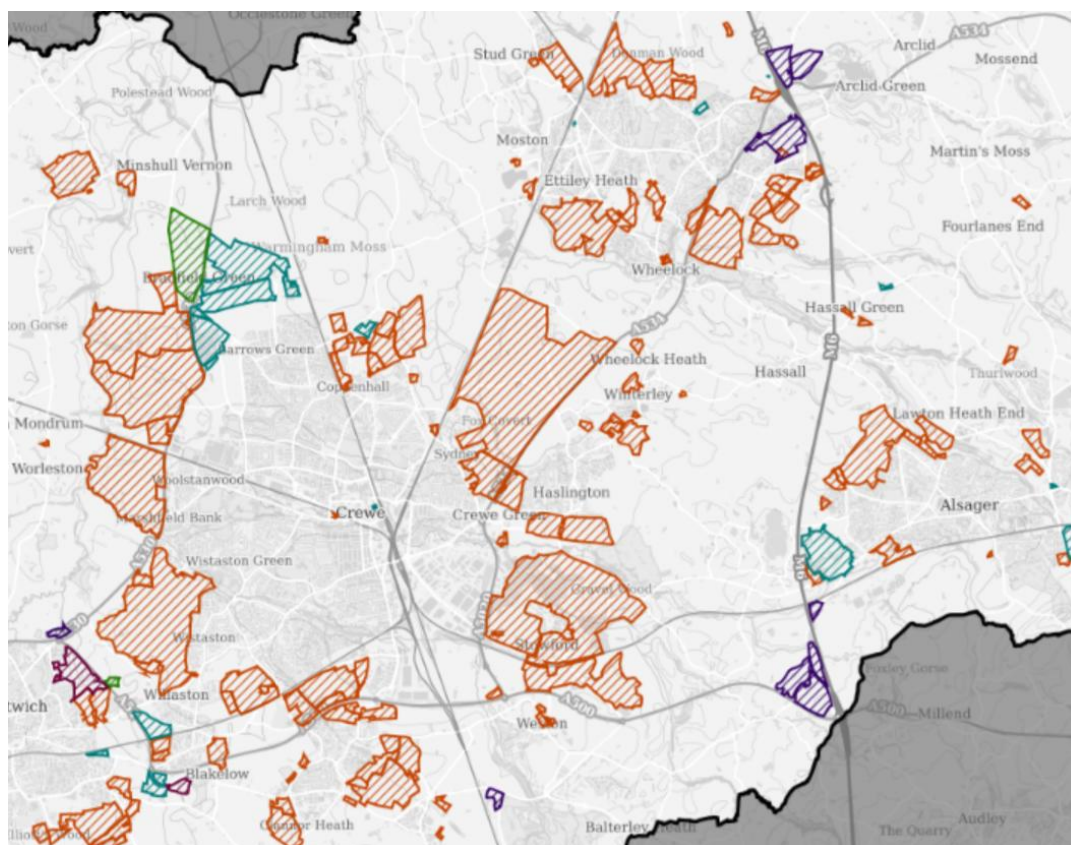


Prestbury

The area in green to the north of Prestbury put forward for mixed development falls within G.B. pockets PR25, PR26, PR27 and PR28. PR25 was rated as making a 'major' contribution to Green Belt, the others a 'significant' one.

CPRE's objections to the New Town proposals and to the unsuitability of the wider Adlington area is well recorded on its website here: <https://www.cprecheshire.org.uk/about-us/what-we-care-about/planning/opposing-adlington-new-town/> with our most substantial report here: <https://www.cprecheshire.org.uk/news/adlington-new-town-report/>.

There are many more Green Belt propositions around Macclesfield, Poynton, Wilmslow and Knutsford and very significant housing developments are proposed all around Crewe and Sandbach, plus a large housing proposal for the north of Alsager.



The wider Crewe area, Sandbach and Alsager

This screen shot of part of CEC's map of site submissions makes clear the scale of, mainly housing, development proposed by landowners and developers for the southern half of the borough

Additionally, we note a cluster of different development propositions around Wardle and housing and employment sites to the west and east of Middlewich respectively – and some smaller housing and employment proposals to the south of Holmes Chapel and around Congleton.

The cumulative land take is not known and neither, at this stage, are any housing numbers or overarching figures for proposed industrial or commercial development, but the picture presented is deeply disturbing.

Of particular concern to CPRE is the cumulative effect of a slew of development proposals which have been coming forward to both Cheshire East and Stockport MBC for pockets of Green Belt land around Poynton, Woodford and Hazel Grove. It is very important, therefore, that Cheshire East have a strong Green Belt policy in their Local Plan that ensures the retention of separation between settlements in Greater Manchester and in Cheshire East remains intact. It is also crucial that they evolve stronger local protective land use designations than the current Green Gap one – designations that are adhered to throughout the period of the new Local Plan. Environmental growth (including biodiversity net gain) ought to be considered on a par with economic growth and, equally, so should social issues. The three-legged stool of sustainability should not be forgotten.

Transport

CPRE would also like to make some pleas in respect of sustainable transport.

One aspect of train travel that is the responsibility of local authorities is access to the rail stations. Many stations still do not have easy access for the mobility impaired. This situation needs to be addressed. We would like to see a commitment to addressing this issue and also to helping to facilitate the reopening of a railway station in Middlewich.

On the active travel front, we would like to see CEC commit to a network of quiet lanes and greenways.

Making it easier for people to use public transport and undertake active travel helps to reduce the demand for roads and helps to mitigate climate change. And any new roads that are promoted should be backed by a strong evidence base and an explanation of how climate change will be mitigated.

Cheshire East must do all it can to avoid taking more countryside than absolutely necessary. Once countryside is lost, it is lost forever. CEC needs to demonstrate that it values the countryside and special landscapes and the natural environment – and that includes protecting ancient woodlands, ancient hedgerows and wildlife corridors.

The first stage of the new fast track Local Plan process is similar to the Issues and Options stage of the previous Local Plan process. Rather than repeat what we said in response to that, we are including that submission as an Appendix. (It is also available on our website here: <https://www.cprecheshire.org.uk/strategic-consultation-submissions/>).

Yours sincerely,

LILLIAN BURNS
on behalf of CPRE Cheshire Branch

Appendix 1:

CPRE's response to CEC's Issues & Options consultation May 2024

May 1st, 2024

Dear sir/madam

CEC – FIRST STAGE CONSULTATION ON NEW LOCAL PLAN ISSUES PAPER & SUPPORTING DOCS

CPRE (formerly the Campaign to Protect Rural England), Cheshire Branch, is pleased to have this opportunity to participate in early engagement on the development of a new Local Plan for Cheshire East, the second since the unitary authority came into being. Our responses to the questions in the Cheshire East Council (CEC) Issues Paper are below, based on the explanatory text in the paper and in the 17 supporting documents published with it.

1. INTRODUCTION – POTENTIAL PLAN PERIOD

Q.1(a) What date do you think the new local plan period should run to? (Give reasons)

A. Local Planning Authorities (LPAs) are now required by government to review, although not necessarily change, their Local Plans every five years. It would therefore be logical to opt for a composite of five. The timespan of the current plan is far too long. Too much can change over two decades. On the other hand, as the CEC Issues Paper states in para. 1.17, strategic policies are required to look ahead over a minimum of 15 years to accord with para. 22 of the National Planning Policy Framework (NPPF) 2023. CPRE therefore endorses CEC's suggestion that the new plan should run to 2045 – the year that CEC has pledged the whole borough will be carbon neutral by. That said, adequate finance must be forthcoming to support quality spatial (as well as development) planning.

INTRODUCTION – CREATING A VISION AND OBJECTIVES

Q.1(b) How can the local plan's vision complement and add land use specific details to the vision and aims of the current Cheshire East Corporate Plan?

A. CPRE's vision aligns with CEC's 'Green' aim. Our vision is for a thriving, beautiful countryside that, along with green spaces, is accessible to all, is rich in nature and plays a crucial role in responding to the climate emergency. Our manifesto calls for a strengthened national planning policy which will enhance meaningful community involvement (<https://www.cpre.org.uk/resources/general-election-manifesto-2023/>) and the first of the Planning Coalition's '6 Tests for Planning' that we endorse is our desire to see plans retain and enhance genuine, accessible community participation and accountability. These aspirations align with CEC's 'Open' and 'Fair' objectives.

We acknowledge that the new local plan will *"need to recognise different priorities"* as stated in the Issues Paper, (para. 1.22). It also needs to concur with the NPPF and the government objective *"to make best use of previously developed land"* (<https://questions-statements.parliament.uk/written-statements/detail/2023-12-19/hcws161> - as required by the written ministerial statement accompanying the NPPF launch, Dec. 2023). The vision and the policies should encapsulate this objective as a fundamental requirement of a sustainable land use policy. And, any vision statement by local government should be properly balanced to ensure equal weight is given to each of the three 'legs' of the sustainability stool – the economy, the environment and society. We make that point whilst assuming that the vision's primary, over-arching, focus will be on responding to the climate emergency in view of the promise made in para. 2.4 of the Issues Paper, ie. *"It [the climate emergency] will need to be reflected through every aspect of the plan and placed at the forefront of planning decisions"*. This is a bold and welcome statement but the commitment behind it has to be questioned in view of CEC's decision in February - to set back its target for the Council itself to become carbon neutral by 2035 to 2045, to concur with the target for the whole borough.

2. RESPONDING TO THE CLIMATE EMERGENCY

Q.2(a) Have we identified the correct issues for the local plan to address in terms of reducing our emissions and contribution to climate change? Are there any other issues that the local plan should consider?

A. CEC have failed to identify the fact that Manchester Airport is a major source of harmful emissions – from the aircraft and from the road traffic it generates. Similarly, the enterprise zone alongside it is a major road traffic generator. Although the passenger terminals are just inside Manchester City Council's border, the runways and part of the enterprise zone and part of the freight terminal are within CEC's borders and, in any event, both sides of the border suffer major air pollution problems. This issue cannot be ignored. There should not be any further traffic-generating development at Manchester Airport and no further development on the Green Belt around it.

CPRE also wishes to point out that, according to official statistics, transport is the largest emitting sector of greenhouse gases (GHGs) and Cheshire East is amongst the worst. The interactive map on the Department for Transport's website shows that CEC is amongst the most polluting authorities, (second highest range), producing between 900 to 1,200 kilotonnes of CO₂ equivalent (ktCO₂e) in 2021 – three times more than the average local authority which produced 304 ktCO₂e (<https://maps.dft.gov.uk/ghg-emissions-by-local-authority/index.html>). The map data was supplied by the Department for Energy, Security and Net Zero. It was posted on the Department for Transport website in October 2023 and it ought to be a wake-up call for the Council.

Q.2(b) Have we identified the correct issues for the local plan to address in terms of adapting to the effects of climate change? Are there any other issues that the local plan should consider?

A. No. The list is nowhere near complete. It confines proposed actions to building materials, measures relating to water and landscaping, the shift to renewables and some new technologies. It makes no mention of the need to tackle air pollution, cease building new roads, save peat bogs such as Danes Moss or expand recycling facilities. In fact, the authority is suspending for the time being three of its recycling sites, probably with a view to closing them permanently. This will merely result in many residents having to travel further to dispose of waste while others will dispose of it in unsustainable ways including sending more to landfill – which creates noxious gases.

Q.2(c) Are there any other matters related to the climate emergency that the new local plan should consider?

A. Whilst it is reassuring to read in the Climate Change Emergency Topic Paper CEC's acknowledgement of the fact it *"has a legal duty to design the local plan to make sure that use and development of land contributes to the mitigation of, and adaption to, climate change"* (para. 1.12), the point needs to be made that, to date, CEC has failed to set a sufficiently sustainable path for themselves and their residents. Each time they commission a new road, (eg. the Middlewich Bypass), they trigger a train of events, all of which contribute to the climate emergency. Minerals and aggregates have to be extracted from the ground and transported, earth needs to be dug up and moved, the amount of land available to absorb rainfall and/or for farming or recreation is reduced and there is greater run-off from roads – much of which enters river basins and other waterways. At the end of the process, more traffic is generated – which exacerbates the demand for more roads. Instead, CEC should be doing all it can to: improve and encourage digital connectivity, which reduces the need to travel, integrate transport and land use planning, facilitate good public transport and make maximum use of previously developed land.

Although there is a passing reference to transport in para. 2.2 of the climate topic paper, and it is featured on page 6 in diagram 2.1, the remedies to the climate issues raised are focused on addressing emissions from over-heating, buildings and flooding. The data quoted is almost entirely national. Notably absent from this paper are statistics about air quality. There is some information on Air Quality Management Areas in the Healthy & Safe Communities Topic Paper, but it is nowhere near adequate. CEC needs to be doing far more work on air quality.

CPRE notes the topic paper's section on sequestration (again referenced generically rather than locally). Para. 2.12 is about the importance of preserving peatlands, a sentiment we wholeheartedly endorse. We urge CEC to make the changes necessary to the new local plan in order to save what remains of Danes Moss. (See our reply to Q.2(a) where we point to the fact that Danes Moss has not been raised as an issue for the Local Plan to tackle). It was an error of judgement to allocate Danes Moss for development in the first Local Plan. That error should be put right. CPRE will judge CEC against: the third of the Better Planning Coalition's '6 Planning Tests' which calls for accelerated climate action in order to meet UK net zero targets (<https://betterplanningcoalition.com/#resources>). Also, we commend to CEC CPRE's advice to planning authorities: 'Climate Emergency: time for planning to get on the case': <https://www.cpre.org.uk/resources/climate-emergency-time-for-planning-to-get-on-the-case/>.

3. HEALTHY AND SAFE COMMUNITIES

Q.3(a) Given the importance of open spaces, are there any specific approaches the local plan should consider?

A. The sixth of the Planning Coalition's '6 Planning Tests' seeks embedded human health, wellbeing and equality in the planning system, notably prioritising access to natural green space, active travel and reduced air pollution.

The Issues Paper and the Healthy & Safe Communities Topic Paper acknowledge the importance of open spaces but the Issues Paper merely lists formally allocated open land and public rights of way (ROW). The topic paper does reference Natural England's Green Infrastructure Framework and the government's Environmental Improvement Plan as well as quoting statistics about the amount of ROW in CEC, but it makes no commitment to expand provision in Cheshire East. It is to be hoped that any new development areas identified in the Local Plan include open spaces and green areas and that important existing open spaces and ROW are well protected.

Q.3(b) How can the local plan minimise effects from pollution and contamination around the borough?

A. The effects can be minimised by not endorsing any high traffic generating developments such as aviation terminals (or other major developments at Manchester Airport), logistics centres or new roads.

See our response to Q.2(a). It flags up the interactive map on the DfT website which shows that Cheshire East suffers much worse than average from emissions from traffic. The map offers the option of viewing years 2020 or 2021. Note particularly the year 2021: <https://maps.dft.gov.uk/ghg-emissions-by-local-authority/index.html>.

Neither the Issues Paper nor the Topic Paper mention noise pollution and air pollution concerns are focused on the declared Air Quality Management Zones, when poor air quality also exists around the airport, the M56 motorway and the major roads. CEC should be placing greater emphasis and funding on air quality monitoring.

Q.3(c) How can the local plan help to improve air quality across Cheshire East?

A. CEC needs to adopt a different mindset. It cannot, on the one hand, be declaring a climate emergency and publishing fine words about tackling climate change and poor air quality and, on the other, be endorsing developing on a peat bog and building new roads. Its actions need to comply with its words if it is to square the circle. It should be taking all actions possible to reduce the need to travel – by ensuring everyone has access to good digital connectivity and communities are sustainable entities – and, when residents do need to travel, providing them with sustainable and seamless public transport options and good conditions for active travel.

Q.3(d) How can the local plan help to create communities and areas where everyone feels safe?

A. In the Issues Paper and in the Healthy & Safe Communities Topic Paper, CEC appears – very oddly - to see 'safety' only in terms of crime. Yet crime is not a spatial planning issue. It can be tackled, to some extent, by appropriate development planning, but a Local Plan is a spatial planning tool. The primary spatial aspect in terms of safety is the need for safe highways – and neither the Issues Paper nor the Topics Papers - on either Healthy & Safe Communities or Transport - mention safe highways. Rural roads are particularly unsafe, always having a significantly higher percentage of deaths, serious accidents and minor injuries than major roads. Road safety can be dramatically improved by enforced lower speed limits, (40 mph on rural roads and 20 mph in built-up areas), safe routes to school and school street measures. The need is for work on the Local Plan and on the Local Transport Plan to be closely co-ordinated. Highways and planning must work collaboratively with each other.

Q.3(e) How can the local plan help to reduce health inequalities across the borough?

A. As with 3(d), the issues covered here are not spatial planning ones. Much data is provided about the health and life expectancy of individuals and about deprivation - but it is not related in the text to spatial planning. The question asks how the local plan can help to reduce health inequalities. One way would be to make a requirement that new developments over a certain size either have to provide a health centre or pay CEC to do it.

Q.3(f) Are there any other matters related to healthy & safe communities that the local plan should consider?

A. In terms of healthy communities, the Local Plan needs to comply with what is the Planning Coalition's fourth 'Planning Test' which is around protecting important biodiversity sites and requiring fit-for-purpose contributions for nature from all developments. The more stable the biodiversity, the healthier the environment. In terms of safety, CEC could encourage and assist all local communities and Parish Councils in producing resilience plans.

4. DESIGN

Q.4(a) What approach should be taken in preparing the Cheshire East Design Code? For example, should it be a strategic level or be broken down into smaller areas and /or development types? How should residents, site promoters and stakeholders be involved in the process? Should the design code be prepared as part of the new local plan or as a separate development plan document?

A. CPRE very much welcomes the fact that the government has elevated the importance of good design in the NPPF and in planning practice guidance and the fact it has introduced a requirement for all Local Planning Authorities to produce a Design Code.

The CEC Design Code will be very important and it is crucial that the authority works with stakeholders, including environmental NGOs, to ensure it is fit for purpose. CPRE hopes to be involved in this process. The fifth of the Planning Coalition's six 'Planning Tests' is a call for conservation, safeguarding and enhancement of heritage and designated landscapes aided by robust data collection, appropriate resourcing and good community participation.

Specifically, the CEC Design Code is going to have to be broken down into smaller areas because the local areas are so diverse – even those which adjoin each other. For instance, the conservation area in the centre of the village of Prestbury consists of many black and white buildings dating to the 15th century, while its access roads tend to feature detached properties of many and varying designs. On the other hand, the adjoining town of Bollington takes its appearance totally from the Peak District and primarily features stone and stone faced properties. While the town of Macclesfield, adjoining them both, is totally different again. It would be impossible to draw up a design code that applied to all three.

Q.4(b) Are there any other matters related to design that the new local plan should consider?

A. Neither the Issues Paper nor the Design Topic Paper mention either Neighbourhood Plans or Village Design Statements (VDSs) – an extraordinary omission. The new plan must take cognisance of any design policies in neighbourhood plans. There are also a number of VDSs that were drawn up some years ago, that were adopted as Supplementary Planning Documents and that still apply, although they would require updating. However, in most cases, they would not need to go through the full exhaustive process they went through in the first instance. They could be carried forward and attached to the Local Plan with modifications following consultation processes.

5. OUR NATURAL ENVIRONMENT

Q.5(a) What approaches/measures should be incorporated in the local plan to protect/improve biodiversity?

A. We repeat here the first paragraph of our response to question 3(f). The Local Plan needs to comply with what is the Planning Coalition's fourth 'Planning Test' – which is around protecting sites for biodiversity and nature's recovery and requiring fit-for-purpose contributions. The production of a Local Nature Recovery Strategy will go a long way towards this and the Design Topic Paper states that one is in production. But, no draft is available to comment on. We are also informed that a draft biodiversity net gain supplementary planning document is in preparation but, here again, it is not tabled at this stage and therefore cannot be commented upon.

Q.5(b) How can the new local plan help to make sure that developments take proper account of, and respect, the landscapes of Cheshire East?

A. The Local Plan needs to do what the consultation material for this first stage has not done and that is to provide illustrations – of landscape types and of designated environmental areas. As far as landscapes are concerned, the relevant part of Natural England's character map should be depicted and so should the local landscape character assessment map which was updated in 2018.

Also, the Natural Environment Topic Paper merely provides the number of each type of special site in section one on page 4, but it does not list them or provide a diagram to show where they are. It is not possible to tell, therefore, if any have been missed.

Q. 5(c) Are there other matters related to our natural environment that the new local plan should consider?

A. Cheshire (west and east) is notable for its meres, mosses and ponds and yet, oddly, they are not mentioned. However, whilst having an excess of these wet areas, Cheshire has less tree coverage than the national average. There should be a commitment to the provision of new woodlands comprising native species.

6. HOMES FOR EVERYONE

Q.6(a) Should the standard method calculation of 1,014 homes per annum be used when preparing the new local plan? If not, what are the circumstances that would warrant a different approach?

A. CPRE does not endorse the standard method for calculating local plan housing targets and calls out its shortcomings, notably the fact that it is based on the 2014 household projections (with an added uplift for 'affordability', subject to a cap). These projections were subsequently shown to be wrong and, amongst other inadequacies, it relies on flawed affordability assumptions which do not yield lower prices when homes are built.

The standard method is only advisory. Local Authorities are not obliged to use it as a starting point if they can show robust reasons why they should not. They should plan for the needs of the future population, not developer demands. In other words, they should rely on the best available data such as that from the 2021 Census. We would also stress that identifying housing need, (whether using the standard method or another one) is only the starting point in deriving a 'housing requirement' figure. Housing requirement must take into account constraints such as Green Belt and in Cheshire East there is a particular need to avoid a further Green Belt review, even if this lowers the deliverable housing requirement figure. This is due to the very recent (in plan-making terms) nature of the last review. Reviews should be 'exceptional' and the boundaries should be set "having regard to their intended permanence in the long term, so they can endure beyond the plan period" (NPPF para 145).

Q.6(b) How could the local plan influence the mix of housing sizes within new developments?

A. Policies on housing mix need to be based on a realistic, evidence-based approach that recognises the site-specific reality of local housing markets. Attempts to apply a formula at a spatial level will simply not work. The present modus operandi is clearly not delivering what is needed. According to para. 3.5 of the 'Homes for Everyone' topic paper, far too many 4+ bedroomed houses are coming forward and far too few one-bedroomed ones.

Q.6(c) How can the local plan address the needs of an ageing population?

A. The 2021 Census revealed that, throughout England and Wales, there were more people than ever before in the older age groups. The (average) proportion of the population who were aged 65 years and older was 18.6%, (ie. 11.1 million people) as opposed to 16.4% (9.2 million) when the previous Census was conducted in 2011 (<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletin/s/populationandhouseholdestimatesenglandandwales/census2021>). However, the Xcel spreadsheet of all the local authorities shows that Cheshire East's percentage is higher than the average at 22.4%. Of the population of 398,800 in 2021, this means that some 89,200 people living in Cheshire East were aged 65 or over in 2021. And, according to the CEC website, the latest population estimate for Cheshire East for mid 2022, published by the ONS in November 2023, is 406,500. Even if the percentage of over 65s had not risen since 2021, that means that 91,056 residents were aged over 65 two years ago. It is apparent, therefore, that the local plan is going to need to focus far more than it has done previously on the housing needs of the ageing population and on ensuring that a range of housing options is available for them. The Plan could designate certain areas close to existing services for older people's developments.

Q.6(d) What types of specialist or older people's housing are needed in Cheshire East and why?

A. The ONS statistics quote in response to question 6(c) make it abundantly clear that there needs to be more specific provision for the older demographic than is currently being made. This needs to include retirement villages and closer care retirement homes as well as more individual homes that are properly adapted and apartments dedicated to senior citizens. If a survey were conducted of older people wishing to downsize from family homes to something more manageable, it is suspected that a large percentage would express a preference for doing so. However, the alternative options are simply not available for them. The local plan should require that, of the total number of homes provided, no less than 15% of homes suitable for older people are delivered.

Q.6(e) How could the local plan support the delivery of small and medium sized housing sites in Cheshire East?

A. These should be delivered in concert with local communities and Town and Parish Councils and, ideally, via Neighbourhood Plans, and they should avoid productive agricultural land, land prone to flooding and any sites in specially designated areas. Previously developed land should be prioritised for use and sites where public transport does not exist should be avoided. There should be no further incursions into the Green Belt.

Q.6(f) How could the new local plan support the delivery of self and custom build housing inc. small sites?

A. National government launched a 'Help to Build' scheme in 2022 to make it easier and more affordable for people to build their own homes. Individuals can now apply to create their own home for up to £600,000 with a

5% deposit and an interest-free (for five years) loan. As CEC is clearly not in a financial position to offer loans or financial incentives itself, it could consider publicising the national scheme more.

Q.6(g) How can the local plan support the development of community-led housing inc. small/exception sites?

A. The first of the Better Planning Coalition's '6 Tests for Planning' says: *"Retain and enhance genuine and accessible community participation and accountability throughout the planning process in all areas"*. CEC clearly needs to work closely with local housing trusts and community organisations, helping them to access government funds on offer, eg. DLUHC's Community Housing Fund, and also advice available from organisations such as Community Led Homes which has a toolbox to assist communities through the planning process:

<https://www.communityledhomes.org.uk/clhtoolkit/planning>. As for the Local Plan, a simple statement supporting the concept subject to other Local Plan policies and planning regulations would probably suffice.

Q.6(h) How could the local plan address the need for affordable housing? Should the same approach be used across Cheshire East?

A. Affordable homes have the potential to address social inequalities. The Better Planning Coalition's second 'Planning Test' (addressed to government) is focused around the need to provide more that are genuinely affordable and the need for greater developer contributions. It is: *"Deliver an evidenced strategy to build genuinely affordable homes, incentivise build-out and provide local authorities with the power to turn down developments which do not deliver affordable housing"*. The problem being that, time and again, developers fail to build the affordable homes they initially promise, quoting viability issues. This problem must be addressed.

Q.6(i) How could the new local plan address the need for First Homes inc. exceptions sites? Should additional eligibility criteria for First Homes be introduced and should the same approach be used across Cheshire East?

A. Regarding the question of using a set criterion for 'First Homes', or any type of homes, across the entirety of Cheshire East. This would be in contradiction of the Council's own Corporate Plan. Para. 1.3 of the 'Homes for Everyone' topic paper explains that the Corporate Plan *"recognises the challenges in the housing market and the need to create a market that delivers the right type of houses in the right locations at the right price to support the needs of residents"*. Such a subtle approach could not be achieved by having too many universal policies that are not sufficiently nuanced to accommodate the variances in different areas.

Q.6(j) How could the local plan encourage the provision of new homes through rural exceptions developments?

A. As rural exception sites are outwith the Local Plan, they should not actively be encouraged. But, if sites of suitable scale and design come forward and are supported by the local community, they should be approved.

Q.6(k) Should the local plan include wheelchair and accessibility standards and what proportion of new homes and specialist housing should comply with those standards?

A. In answer to question 6(c) we quote the ONS population figures which reveal that over a fifth of the population of Cheshire East is aged 65 and over. The 'State of Ageing' report 2022 by the Centre for Ageing Better revealed that only 9% of homes have all four accessibility features that many older people need: a WC at entrance level, a flush threshold to the WC, sufficiently wide doorways and circulation space and a level access (<https://ageing-better.org.uk/housing-state-ageing-2022>). 9% is clearly inadequate for population needs and must be addressed.

Q.6(l) Should the local plan require new homes to meet the nationally described space standards. If not, why?

A. The government's nationally described space standards for new homes should be a minimum requirement.

Q.6(m) How could the council meet future needs for pitches for Gypsies & Travellers & Travelling Showpeople?

A. The Plan should be informed by an up-to-date assessment of need for the different types of site provision (transitory, long stay etc.). It should aim to meet the need via existing site supply and/or suitable allocated sites and criteria-based policy. This should focus on brownfield sites and good access to local services etc., and help reduce the pressure for unauthorised encampments on less suitable sites eg farmland.

Q.6(n) Have we identified the correct housing issues for the local plan to address? Are there any other matters related to homes for everyone that the new local plan should consider?

A. The National Planning Policy Framework calls for integration of land use and transport planning in order to reduce the need to travel (<https://www.gov.uk/guidance/national-planning-policy-framework/9-promoting-sustainable-transport>). This should be CEC's mantra along with a commitment to a 'smart growth' approach, encompassing urban regeneration curbing urban sprawl (<https://smartgrowthuk.org/>).

The NPPF approach to Green Belt, brownfield land and housing numbers & the DLUHC's latest intervention

Local Plans that have not yet reached Regulation 19 stage or been submitted for examination will be tested henceforth against the new National Planning Policy Framework (NPPF). This state of affairs applies to Cheshire East which is at the very earliest stage of a Local Plan renewal process.

The revised NPPF, published in December 2023, was accompanied by a written ministerial statement which confirmed that the government's objective was: *"to make the best use of previously developed land and locate more homes in our larger towns and cities where development can help to reduce the need to travel and contribute to productivity, regeneration and levelling up"*. Paragraph 62 of the new NPPF now requires the 20 largest urban areas in England (none in Cheshire West and Chester or Cheshire East) to deliver a 35% 'uplift' on top of their objectively assessed needs (OAN).

Importantly, the new NPPF states: *"there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated"* (para.145). Speaking about the NPPF in December, Michael Gove, the Levelling Up Secretary, said: *"Local authorities have the comfort of knowing that they need not re-draw the Green Belt or sacrifice protected landscapes to meet housing numbers"*. Only *"where exceptional circumstances are fully evidenced and justified"* should Local Planning Authorities (LPAs) choose to review and alter Green Belt boundaries.

Paragraph 146 says: *"Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development"*. In other words, LPAs at an early stage in plan preparation, are required to – in effect – conduct a cost and benefit analysis of exceptional circumstances.

Alongside this more robust approach to protecting Green Belt, the revised NPPF also now states clearly that the standard method for calculating housing need should be treated as *"an advisory starting point for establishing a housing requirement for the area"* and not a target. The accompanying ministerial statement clarifies this further. It says: *"the standard method for assessing Local Housing Need ensures that plan-making is informed by an unconstrained assessment of the number of homes needed"*. This means that the standard method is not set in stone and it opens the way for a more flexible interpretation of housing numbers to be tested through the examination process.

Consequently, CPRE urges CEC to evolve a new Local Plan which makes best use of previously developed land (including land currently designated for employment and retail use) and not to review its Green Belt boundaries. Any further review of Green Belt would add to the very substantial one which was only recently (in plan-making/Green Belt terms) carried out. Repeated reviews of Green Belt boundaries is not what is envisaged in the NPPF (para. 145).

CPRE would also point to the most recent government announcements and interventions on the subject of brownfield development – some just directed at the 20 largest cities and towns, which will be made to follow a 'brownfield presumption' – and some directed at all LPAs. On February 13th 2024, DLUHC opened a consultation on 'Strengthening planning policy for brownfield development'. The accompanying press release explained that legislation was laid in parliament that day that will extend permitted development rights so that commercial buildings (shops, offices and other buildings) of any size will have the freedom to be converted into new homes. In the release, Michael Gove says: *"Today marks another important step forward in our long term approach housing, taking a brownfield first approach to deliver thousands of new homes where people want to live and work without concreting over the countryside. Our new brownfield presumption will tackle under delivery in our key towns and cities – where new homes are most needed to support jobs and drive growth"*.

7. TOWN CENTRES AND RETAIL

Q.7(a) Have we identified the correct town centres issues for the new local plan to address? Are there any other issues that the new local plan should consider?

A. CEC have identified the key issues. CPRE applauds the fact that some realities have now been recognised, ie. that there is a surplus of allocated retail and office space in town centres, that some of the areas so allocated could now be used for residential purposes and that by so doing the remaining retail and commercial businesses would be assured of a healthier and more vibrant future. All of this is in keeping with the 'Smart Growth' ethos that CPRE expounds. CPRE is a member of the Smart Growth Coalition: <https://smartgrowthuk.org/>.

CPRE also commends the recognition that open spaces, greening and improving the public realm all have a big part of play in supporting town centres. We advocate the drawing up of master plans for each town and local centre to ensure that their futures are properly planned.

Q.7(b) Have we identified the correct retailing issues for the local plan to address? Are there any other issues that the local plan should consider?

A. In addition, CPRE is heartened by the recognition that neighbourhood parades of shops have a big part to play in engendering successful local communities. We have long been advocates of sustainable communities where people can access most of the everyday essential services they need locally, thereby reducing the need to travel.

Q.7(c) Are there other matters related to town centres and retail that the new local plan should consider?

A. CEC should not allow random domestic properties to appear in between retail and commercial units. Ensure there is a proper master plan for each town/village centre that defines the areas most suited to each type of use.

8. JOBS, SKILLS AND ECONOMY

Q.8(a) How can the local plan support new and existing businesses?

A. The 'Jobs, Skills and Economy' topic paper reveals (in para. 2.4) that the very high expectations for new job creation that underpinned the first CEC Local Plan have not materialised. The prediction was that tens of thousands of new jobs would be attracted into Cheshire East, requiring huge allocations of land for employment and housing. The actuality has been that the annual average jobs growth between 2010 and 2022 was only +1.0% and, in the last measured year that is reported (2022), there was a net decrease of 6,000 jobs which equated to a fall of 2.9% on the total number of jobs in 2021. Also, table 2.22 reveals that only a quarter of the new land allocated for employment use has been taken up.

There does not appear to have been a survey of established employment sites to record how much of them is vacant. However, it is apparent that Cheshire East seriously miscalculated with its last Local Plan and does not need to allocate more land than already exists for employment. In fact, it should be considering re-allocating some of the existing sites for other purposes as the paradigm of traditional workspaces has undergone a seismic shift. Bearing in mind the fact that Cheshire East, in common with other local authorities, has now taken over the responsibilities of the Local Enterprise Partnerships, it should be harnessing the possibilities of digital connectivity and supporting the creation of local enterprises – particularly those set up for community benefit.

Very oddly, neither the Issues Paper nor the 'Jobs, Skills and Economy' topic paper discuss home working. Even before the Covid pandemic, this was rising significantly but, as of 2023, 44% of UK British people worked from home at least some of the time and 16% of UK workers worked exclusively from home. Some 58% of employers offered remote work to all viable staff in 2023 and one in four workers worked a hybrid week (<https://standout-cv.com/remote-working-statistics-uk>).

Q.8(b) Are there sectors that the borough does not currently make provision for and should? If so, please expand on your answer.

A. The change in working practices identified in answer to question 8(a) needs to be reflected in the design/layout of homes being built. More homes need to include office/study space and many small communities, particularly rural and semi-rural ones, might well benefit from having modest size IT hubs. The Council should not just be thinking about how it can help large and medium sized businesses. It should be thinking about small businesses, people working from home and rural businesses and it should be rural proofing all its outputs.

Q.8(c) What approaches can the local plan take to support the green economy?

A. CPRE supports rooftop renewables and wants to see solar panels on the roofs of warehouses, car parks and commercial buildings in particular, not on green fields. Research by the Energy Institute of University College London shows that decarbonising the national energy grid can require far less land than originally feared (<https://www.cpre.org.uk/resources/shout-from-the-rooftops-delivering-a-common-sense-solar-revolution/>). Installing solar panels on existing building and car parks would enjoy near universal public support and help minimise objections to large solar farms in the countryside. Cheshire East should be promoting this approach.

Q.8(d) How should the local plan address the future need for logistics?

A. The Issues Paper itself recognises that the freight and logistics sector *“contributes to pollution and congestion”* (para. 8.7) and *“can have a negative impact on the UK transport system and the environment”* (para. 8.8). Government statistics released in February showed that transport, which accounts for 28% of harmful emissions, was by far the most polluting source of greenhouse gases.

On the A538 on Cheshire East’s border with Trafford MBC and with Manchester City, the vast ‘Global Logistics’ hub between the Manchester Airport tunnels and the M56 was simply declared to be an ‘enterprise zone’ by the Coalition government. No due planning process was involved. It is a huge generator of traffic. Another big traffic generator is Midpoint 18 off the A54 at Middlewich to the west of the M6, due to be extended as part of the scheme to build the Middlewich Bypass. Bearing in mind that there are other logistics hubs not far from the L.A. borders at Winsford Gateway and Trafford Park, there should be no further logistics centres in Cheshire East.

Q.8(e) How can this be balanced with the need to minimise negative impacts on the environment and the transport network?

A. There should be no further logistics centres beyond the extension already planned to the Midpoint 18 one.

Q.8(f) What evidence is needed to support appropriate planning policies?

A. Large road-based logistics centres are huge generators of HGV traffic which, in turn, generate large amounts of harmful emissions. If adequate evidence were collected on the amount of traffic and air pollution generated by logistic centres, it would prove the case that, environmentally, no more logistics centres can be sustainably accommodated.

Q.8(g) How can the local plan support tourism and the visitor economy?

A. There is an over-emphasis on major tourist destinations. What is needed is for more attention to be drawn to the many attractive villages whose hospitality and retail businesses would benefit from more tourism.

Also, we cannot concur with the statement in para. 8.12 of the Issues Paper that *“the extensive footpath, cycleway and bridleway network is a key attraction of the borough”* because those that exist suffer from poor or non-existent maintenance. Also, CPRE has long advocated for a network of quiet lanes and greenways and, whilst this concept was supported in the first ever Local Transport Plan that Cheshire County Council produced, it was never subsequently facilitated or financed by either the County Council or either of the unitary authorities that succeeded it. Just one tiny and token quiet lanes scheme was introduced by the County Council in Langley, south of Macclesfield some years ago, but it did not receive ongoing support or publicity and was allowed to languish.

Q.8(h) How can the local plan minimise the skills gap/ensure local people can take advantage of opportunities?

A. In July 2023, the CEO of the Careers and Enterprise Company highly commended the *“truly inspired”* Pledge Partnership that Cheshire and Warrington Local Enterprise Partnership (LEP) had established to connect all 86 schools and colleges in the sub-region with 550 businesses (<https://www.fenews.co.uk/education/englands-school-careers-chief-hails-exceptional-cheshire-and-warrington-partnership-linking-employers-with-young-people/>). It is to be hoped that the three unitary authorities who have now taken over the work of the LEP are continuing with The Pledge. That said, it is not really directly connected to the local plan.

Q.8(i) Are there any other matters related to jobs, skills & economy that the new local plan should consider?

A. How accessible is Macclesfield College to would-be students living in the south of the borough and how accessible is Cheshire College South & West to would-be students living in the north of the borough? Are secondary school students throughout Cheshire made aware of the courses/opportunities that exist at both?

9. TRANSPORT AND INFRASTRUCTURE

Q.9(a) How can we support active travel through policies in the new local plan?

A. By having a policy in the Local Plan and also in the Local Transport Plan to create a network of Quiet Lanes (on-road routes) and Greenways (off-road routes). This, to supplement an extended provision of cycleways and more cycling storage provision. However, it has to be said that a major turn-off to cycling is poorly maintained roads and particularly poorly maintained cycle lanes, which present a danger to cyclists who frequently have to digress from them into the traffic to avoid hazards such as fallen branches and flooding due to blocked drains. We note the admission in the Transport and Infrastructure Topic Paper that: *“A perceived lack of safety and fragmented cycling network are consistently identified as the main barriers to higher levels of cycling”* (para. 2.5).

We note the five improvements listed in the topic paper that would benefit walkers, wheelchair users and the mobility impaired (para. 2.3). To this we would add the much wider provision of dropped kerbs.

General improvements to the public realm could be covered within the master plans we have recommended should be prepared for all urban centres. If villages had 20 mph speed limits and all rural roads had 40 mph limits, not only would more people be encouraged to walk and cycle, but there would be a reduction in the number of people killed and seriously injured in road traffic accidents.

Q.9(b) How can public transport be supported through policies in the new local plan?

A. The local plan should make a commitment to focus new developments in places where public transport already exists or can easily be provided and it needs to be a requirement that developers make a contribution to it. Also, Cheshire East Council should have a policy of improving access to rail stations, especially rural ones.

CPRE very much supports the re-opening of a railway station at Middlewich and, for this reason, objected when the planning application came forward to build houses on the former station site. The lack of foresight in permitting residential development here led to the present problem of having to find and establish a new location for a station. However, now that a new site has been identified, it is to be hoped CEC will keep the commitment it made to re-open the station in its first Local Transport Plan, a plan that is overdue for renewal.

Q.9(c) Are the current parking standards suitable and is there anything further in planning policy that the council should do in relation to parking?

A. The parking standards information quoted in the Issues Paper and the Transport Topic Paper are out of date because, despite opposition from local communities, CEC went ahead and agreed in January to introduce parking charges on all of its car parks from October this year. Up to now, free car parking has been one feature in favour of many of the smaller centres around the borough. Now they fear that their commercial and retail enterprises will be deleteriously affected by the introduction of charging and local residents anticipate a big increase in illegal parking, especially as an increase in parking charges has been mooted for January 2025.

Q.9(d) Is there any more the council should be doing regarding the seeking and use of developer contributions that is achievable within the strict planning regulations framework that governs this matter?

A. There is much more the Council could do in terms of seeking and continuing to pursue developer contributions, if only the staff resource were made available.

Q.9(e) Are there any particular requirements for new or improved infrastructure that you consider are needed to support further development in the borough/should be provided for as part of the new local plan process?

A. No doubt some respondents to this consultation will call for new roads/ bypasses here or there, but it would be a seriously backwards step for the Council to agree to such a move, especially as it is going to struggle as things are now to meet its climate change commitments. New roads and bypasses only ever provide very short term solutions to traffic problems and because they generate new and extra traffic movements, they quickly fill up and create demands for further highway capacity. This is not a sustainable way forward and it should be resisted.

Local Plan Transport Fund Allocations

On February 26th this year the Department for Transport (DfT) announced a series of additional Local Transport Fund Allocations – to be awarded to named Local Transport Authorities for them to spend on transport interventions of their choosing (within imposed criteria) over a seven year period from 2025/6 to 2031/2. This being funding that has been re-allocated to the North and Midlands from the HS2 ‘pot’.

Cheshire East is to benefit by an additional £180.716m over that period (£35.8m p.a.) in addition to the £14.021m (£2.003m p.a.) they would have received under their current allocation. In other words, overlapping into the period of the next Local Plan (the existing one running until 2030), CEC will have a total of £194.737m to disburse on transport-related projects. The criteria set by the DfT is that the funding must be used in line with the following three priorities:

- drive better connectivity within our towns, suburbs and cities
- drive better connectivity between our towns and cities
- improve everyday local journeys for people

Further guidance on the scope of the LTF money, which won’t be awarded until next year, is promised.

Whether or not the guidance specifically re-iterates the over-arching need for all Local Planning Authorities to meet the national climate change commitments remains to be seen, but the fact of the matter is that the UK government has signed up to them. And many Local Authorities, including CEC, resolved to do even better. When CEC declared a climate emergency in 2019, it brought forward its Environment Strategy and committed to becoming carbon neutral as a council by 2025. In January 2022 it made a further pledge to make Cheshire East a carbon neutral borough by 2045. If CEC is to meet its targets, it is essential that it produces a Local Plan and a Local Transport Plan which both have climate change awareness at their heart. Sustainable transport policies are essential, focusing on integrating land use and transport planning – as required by the NPPF – in order to reduce the need to travel. Chapter 9 of the NPPF ('Promoting Sustainable Transport') opens with the following:

- "108. Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*
- a) the potential impacts of development on transport networks can be addressed;*
 - b) opportunities from existing or proposed transport infrastructure, and charging transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
 - c) opportunities to promote walking, cycling and public transport use are identified and pursued;*
 - d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
 - e) patterns of movement, street, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.*
- 109. The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health".*

Work on revising the Local Plan and the Local Transport Plan needs to be well co-ordinated. Both should be evolving the most environmentally friendly plans possible. Amongst other things, this means using the new transport funds for sustainable transport interventions such as carbon-free bus services and improving access to railway stations and walking and cycling facilities including safe routes to school.

Q.9(f) Are there other matters related to transport & infrastructure that the new local plan should consider?

A. Whenever surveys of the travelling public are conducted by Travel Focus or others, the top priority that always emerges is the maintenance and safety of the existing road infrastructure. CEC should bear this in mind. We also commend to CEC the CPRE national transport policy which emphasises the need for transport and planning to be better integrated than they are and which advocates a sustainable transport hierarchy at the top of which is digital connectivity. This is because having top quality digital connectivity and making best use of it is a means of reducing the need to travel: <https://www.cpre.org.uk/resources/cpre-transport-policy/>.

10. HISTORIC ENVIRONMENT

Q.10(a) If general policies relating to the protection of heritage assets are included within National Development Management Policies in the future, are there other heritage matters that would still need to be included?

A. Whilst the government has stated that National Development Management Policies (NDMPs) will incorporate a suite of heritage policies that will include one covering improvements to historic buildings, it is not known how extensive these will be. It is therefore not possible to answer this question at this stage.

Q.10(b) Do you agree with the proposed approach to provide appropriate protection to the Jodrell Bank Observatory World Heritage Site?

A. It is not clear why the Jodrell Bank Observatory Supplementary Planning Document was not finalised and adopted following the consultation on the draft which took place between December 2021 and February 2022.

The other point we would make is that the 'buffer zone' around Jodrell Bank has not always been observed in terms of the planning permissions granted in the past. Now that the site holds the international designation that it does, there should be no further cases where inappropriate development is permitted within the zone.

Q.10(c) Are there other matters related to the historic environment that the new local plan should consider?

A. The answer to this question is the same as that to question 10(a), ie. it is not possible to answer because it is as yet unknown what the government (DLUHC) will be including in their heritage NDMPs.

11. TOWNS AND VILLAGES

Q.11(a) Do you agree with the proposed approach to reviewing and updating the settlement hierarchy? Are there any other factors that we should consider?

A. One of the problems of placing all the villages identified as 'Local Service Centres' into one classification is that they range significantly in size, from Bollington with a population of circa 8,000 and Haslington not far behind to Bunbury with a population of a little over 1,000 – and several villages are surrounded by Green Belt. They vary greatly in their features, density, rurality and ability to absorb expansion and should not all be treated the same.

Q.11(b) Have we identified the right matters to take into account when considering the distribution of development across the borough? What else should be considered?

A. Missing from the list is the need to identify where land can be reallocated, for instance in failing retail areas and in areas currently allocated for employment use but no longer required due to changes in working practices.

Q.11(c) How can the local plan best support and encourage the re-use of previously developed and urban land whilst making sure that sufficient development comes forward to meet needs?

- A.
- By ensuring that the brownfield register is fully up-to-date
 - By co-ordinating infrastructure to bring forward more brownfield sites
 - By encouraging higher densities where appropriate to the character of the area and
 - By promoting pro-active use of master planning, compulsory purchase other planning tools

Q.11(d) Have we broadly identified the right matters to take into account when considering which sites to include in the local plan? What else should be considered?

A. It is good to note that landscape impact, Green Belt and air quality are listed as being important issues to be considered. We also note that the list refers to "*accessibility of the site to important services and facilities*". This is frequently a key issue that is not properly resolved when new developments are proposed. It should be seen as paramount that there are adequate educational and medical facilities.

Q.11(e) How can the local plan support existing and/or proposed community facilities?

A. The local plan could state that new development should be sited in locations that are either well served with community facilities or which can be made to be well served as part of the proposal.

Community facilities such as banks, cash machines, post offices and public lavatories have declined significantly everywhere, as has the physical retail offer and the maintenance of roads, public drains and the public domain. Also, the important community facility of having free car parking in many local centres is about to be removed from them and the community facility of removing garden waste from all properties has already been removed altogether from the entire borough.

Garden waste is now only taken away from premises that pay for the service separately from their Council tax and the community facility of having convenient local waste recycling centres is about to be lost. In addition, financial support for bus services and the extent of road gritting has been regularly reduced. It is hard to see how the local plan can be used to restore any of these things at a time when CEC has declared itself to be in danger of having to issue a s114 notice, to the point where it recently needed to accept exceptional financial support from government for the next financial year to the tune of £17.6m.

Q.11(f) Are there any specific issues in your town, village or local area that the new local plan should help to address? Tell us what the issue is, which town/village it affects and how the local plan could help to address it.

A. This is not a response on behalf of an individual or one community, it is a response on behalf of CPRE – the Campaign to Protect Rural England.

Q.11(g) Are there any other matters related to towns and villages that the new local plan should consider?

A. When Cheshire East was compiling its first local plan, CPRE appealed to it to carry forward the Village Design Statements that existed at the time. This was rejected. We would like to use this opportunity to repeat our point that, with suitable updating, most could still apply and be adopted as Supplementary Documents.

12. RURAL MATTERS

Q.12(a) What policies should be included in the local plan to support the role of agriculture in Cheshire East?

A. CEC needs to introduce a policy which protects the farmed countryside from potentially damaging developments and other uses which deplete its natural assets and the long term benefits they provide. Any best and most versatile land should automatically be protected, but so should grade 3B agricultural land given its important role in food production.

Q.12(b) What policies should be included in the new local plan to protect the best and most versatile agricultural land? How can the plan also recognise and promote the benefits of other agricultural land?

A. There should be a policy not to build on the best and most versatile land.

Q.12(c) What types of development should the new local plan allow for in countryside areas? What types of uses are appropriate in a rural area?

A. Some carefully-designed affordable housing in places already served by public transport or which could be easily served by public transport is appropriate. NOT appropriate is solar farms. Solar panels should be confined to rooftops and brownfield sites.

Q.12(d) Are there other local plan policies that could help to support the sustainability of rural communities?

A. CEC, possibly in concert with Cheshire West & Chester and Warrington, could consider establishing a local partnership involving farmers, landowners, NGOs and experts to develop a vision and plan which addresses the challenges and opportunities of the sector.

Q.12(e) Are there any 'exceptional circumstances' that would justify making further alterations to the Green Belt boundaries in the next local plan?

A. No there are not and in fact Cheshire East itself maintained during the last local plan process that it would not need to allocate any more Green Belt for development than it already had for the following plan period. It has already safeguarded areas of land for use during this plan period which it removed from Green Belt. We would also re-iterate here a point we made earlier in this submission, which is that the NPPF (para. 145) requires Green Belt boundaries to be set for the long term. Any further review so soon after the last one would conflict with para. 145.

We commend to CEC CPRE's report 'State of the Green Belt 2023: A vision for the 21st century' on the national CPRE website: (<https://www.cpre.org.uk/resources/state-of-the-green-belt-2023-a-vision-for-the-21st-century/>).

Q.12(f) What approach should be taken to the strategic green gaps in the new local plan? Are there any other gaps that would warrant protection in the plan?

A. The Green Gap designation has not been a robust mechanism for protecting undeveloped areas in the past. CEC should respect it more in the future.

Q.12(g) Are there any other rural matters that the new local plan should consider?

A. First and foremost, CEC should be better rural proofing its outputs than it currently does. Rural areas and the needs of rural residents need to be given greater consideration.

13. MINERALS

Q.13(a) Should the council prepare a single local plan including minerals and waste policies, or a separate one?

A. There is no obvious reason why minerals and waste cannot be integrated into the main Local Plan for the borough. On the contrary, there is much to be said for fully integrating and for having an holistic approach. More importantly, the policies and site provision for both topic areas should adequately take account of the wider sub-

regional picture (on need and supply of sites, landbanking, etc) in order to encourage practices such as the recycling of aggregates from demolition sites.

Q.13(b) Do you have any comments on the policies the council should develop to meet national requirements around the safeguarding of mineral resources and the need to provide a steady and adequate mineral supply?

A. CEC should state as a policy position that it is necessary to achieve the more prudent use of natural resources through re-use, recovery and recycling and the use of alternative materials wherever possible.

Q.13(c) Are there any other minerals matters or specific issues that the development of mineral policies should address in the new local plan?

A. The issue of the number of heavy lorry movements relating to quarries is never properly addressed.

14. WASTE

Q.14(a) Should the council safeguard all waste sites or just those considered to be of strategic importance?

A. If a high recycling rate is to be sustained, if fly tipping is to be kept to a minimum and if the transport of waste is to be kept to a minimum, CEC need to retain all of its current household waste reception facilities. It knows this and yet, for economic, rather than environmental reasons, it has made the decision to mothball or close household recycling sites at Bollington, Poynton and Middlewich and to continue to support just four core sites at Alsager, Crewe, Macclesfield and Knutsford. The latest announcement relating to this mentions the trial of “a mobile household waste recycling service for the residents of Bollington, Poynton and Middlewich” and their surrounding areas. It is unclear what this will amount to but it obviously will not be offering the same facilities. This is a seriously backwards step in the handling of waste.

Q.14(b) Should the council have a dual safeguarding approach of identifying a minimum buffer around waste management facilities and infrastructure as well as a wider buffer where this is considered appropriate?

A. The practice of having buffer zones around waste facilities exists for proven health and environmental reasons and waste directives exist, setting out the requirements. As long as CEC comply with the legal requirements, directives and guidance, the details of how they manage their responsibilities is up to them.

14(c) Are there any other waste matters/specific issues that the development of waste policies should address?

A. According to the government’s waste guidance in relation to the preparation of local plans published in 2015, (<https://www.gov.uk/guidance/waste#preparing-local-plans>): “The Local Plan relating to waste should identify sufficient opportunities to meet the identified needs of an area for the management of waste, aiming to drive waste management up the Waste Hierarchy. It should ensure that suitable sites and areas for the provision of waste management facilities are identified in appropriate locations”. And also: “Local Plans are the key to delivering sustainable development that reflects the vision and aspirations of local communities. It is important that waste planning authorities engage and collaborate with local communities in an early and meaningful way when identifying options for managing waste”. Communities about to lose their local waste facilities are in fact deeply unhappy about it.

14. OTHER ISSUES AND NEXT STEPS

Q.15 Are there any other issues that the new local plan should address that are not covered within any of the topic areas set out in this issues paper?

A. Not covered in the Issues Paper, but required by the National Planning Policy Framework, paragraph 20, under ‘Plan making’ are: leisure, telecommunications, security, water supply, wastewater, flood risk, community facilities including health, education and cultural infrastructure and conservation and enhancement of the natural environment including green infrastructure. It is also a moot point as to whether landscape is adequately dealt with.

It is to be earnestly hoped that the financial pressures assailing Cheshire East do not prevent it producing a thoroughly sound and resilient second Local Plan.

Yours faithfully,

Lillian Burns,

Planning Policy Volunteer on behalf of CPRE Cheshire