

Consultation: New Towns Draft Programme Response from The Cheshire Wildlife Trust

Section 3.1 - Assessment of locations

Question 7 Thinking about the 13 locations listed, which locations do you believe have positive features that could help achieve the objectives of the New Towns programme? What do you believe are the positive features of the location(s) you have selected?

We support the responses provided by individual Wildlife Trusts on the assessment of individual locations.

Question 8 Do you think any of the 13 locations listed face barriers which could hold back delivery of the New Towns Programme objectives?

(Yes/No/Not sure)

If you answered yes, please tell us what you believe the barriers to delivery in the location(s) you have selected are.

CWT has undertaken a baseline ecological assessment and a baseline Biodiversity Net Gain assessment and concluded that the proposed Adlington new town would be sited in one of Cheshire's most environmentally sensitive and highly protected landscapes.

The area contains rich ecology, a rare intact historic landscape, and plays a critical role in regional wildlife connectivity. It is mapped in the Local Nature Recovery Strategy either as a 'Core Local Nature Site' or an 'Opportunity Area for Nature Recovery'. Adlington is pivotal to hopes of building a connected network of nature recovery sites across Cheshire.

Developing this site would mean that it would be impossible for the government to meet its objectives on environmental sustainability for the New Town programme and viability of the scheme could be severely impacted by the cost of having to achieve a minimum 10% Biodiversity Net Gain on a site of such high existing biodiversity value.

Question 9 Do you have any comments about whether the SEA report has identified the main environmental issues relevant to the 13 locations?

(Yes/No/Not sure)

If you answered yes, please expand here.

For Adlington the SEA has identified short and medium term impacts on biodiversity. In the long term the assessment concluded that the impacts to biodiversity could be minor negative but also could be minor positive.

It is unclear how this conclusion was reached as a detailed investigation by the Cheshire Wildlife Trust has found development at this site could cause significant impacts to biodiversity, ecological networks, Priority Habitats and will particularly impact bird diversity, including many red-listed, amber-listed, and Schedule 1 species.

Our report highlights that building a new town at Adlington has the potential to cause severe and potentially irreversible damage, making it incompatible with the environmental standards expected for new town development and particularly incompatible with the new Local Nature Recovery Strategy for the Cheshire region.

Question 10 Is there any additional environmental information about these locations that the SEA should take into account? (Yes/No/Not sure)

If you answered yes, please tell us what additional information the SEA should take into account

The Cheshire Wildlife Trust has undertaken a comprehensive baseline ecological assessment and a baseline Biodiversity Net Gain appraisal of the proposed site at Adlington using detailed habitat mapping derived from the Local Nature Recovery Strategy mapping undertaken in 2025. These reports are available on CWT's website.

<https://www.cheshirewildlifetrust.org.uk/sites/default/files/2025-12/Adlington%20report%20%282%29.pdf>

<https://www.cheshirewildlifetrust.org.uk/sites/default/files/2026-05/Adlington%20BNG%20Report%20and%20Maps.pdf>

The BNG baseline assessment concluded that to achieve a 10% uplift in biodiversity the scheme would need to secure approximately 9331 area-based units, 751 hedgerow units and 238 watercourse units post-development. These figures are substantial and are highly unlikely to be achievable on site. The high cost of securing these units could mean the viability of the scheme is affected. This aspect needs to be taken into account during the decision process.

Question 11

Do you have any suggestions for practical mitigation measures to address effects identified in the SEA report? (Yes/No/Not sure)

If you answered yes, please set out the practical mitigation measures here.

Question 12 Do you have any other feedback on the SEA report, including the issues and effects identified therein?

The SEA recognises the likely significant effects of the New Towns programme on biodiversity, flora and fauna. However, we are concerned because the Adlington site is so rich in biodiversity the onsite mitigation measures are unlikely to be sufficient to ensure biodiversity will be protected, restored and enhanced in line with the New Towns planning policy principle on environmental sustainability.

The policy commits to embracing ambitious standards to create low carbon, climate resilient buildings and neighbourhoods which help to protect, restore and enhance biodiversity. Creating a new town on a site of existing high biodiversity (as demonstrated by the density and diversity of priority habitats, threatened species, and ecological corridors and networks) would make these standards unachievable for Adlington. Importantly development at Adlington could undermine the ambition of the new Local Nature Recovery Strategy secured through the Environment Act 2021.

Section 3.3: Proposed New Town locations

Question 13 Do you think the 7 locations proposed for the new towns programme are the ones most likely to meet the programme's objectives?

No comment.

If no, please set out why you think the proposed locations do not meet our objectives.

Section 4.1 - Government offer

Question 14 Do you agree with the overall government offer for proposed new town locations?

No comment.

If you answered no, is there any additional support you think should be offered?

No comment

Question 15 Do you think there are any additional interventions that government should consider to ensure design and placemaking quality in new towns?

(Yes/No/Not sure)

If you answered yes, please set out the additional interventions government should consider.

Local Nature Recovery Strategies should inform the locations of new towns to ensure nature's recovery is integrated into spatial planning and landscape design. All new towns should create natural corridors of green-infrastructure (with long term funding for management) that connect to the wider landscape and allow nature to recover.

There should be enforceable high standards on sustainability with low carbon buildings and infrastructure, minimisation of water and energy use. Importantly placemaking should enable people to enjoy the beauty of nature on their doorstep with innovative design.

Realising this ambition will require minimum standards (for biodiversity; landscape; energy efficiency and water efficiency) along with clear policies on how these will be assessed, monitored and enforced. We suggest that a minimum 30% biodiversity net gain should be the target for all new towns.

Section 4.2 - New Towns planning policy

Question 16 How clear do you find the proposed planning policy?

Very unclear

If you answered unclear, which elements are unclear and how would you suggest changing them?

The policy provides a few overarching vague principles which could be interpreted in many ways.

Of particular concern is that it specifies substantial weight should be given to social and economic benefits of New Towns without referencing environmental benefits. This undermines the definition of sustainable development which promotes all three equally.

Guidance should set out that New Towns need to align with the existing priorities of Local Authorities and local residents, such as ensuring locally protected landscapes, nature or heritage are protected. Without this placemaking principles are severely undermined.

It provides no direction on how government objectives for nature and climate should be considered in the decision-making process. In particular there needs to be wording stating:

- the mitigation hierarchy and all statutory environmental protections and obligations apply in full.
- there will be no modification of the Habitat Regulations, Environment Act or NERC Act

Question 17

Do you think establishing the placemaking principles in the proposed planning policy is an effective way to implement the placemaking ambition of the programme?

(Yes/**No**/Not sure)

If you answered no, how do you think the placemaking principles should be implemented?

The place-making principles are vague and need to specify clearly defined expectations, standards and thresholds if the aim of achieving exemplary sustainable development is to be achieved.

Accountability is missing from the principles, particularly named accountability for biodiversity, green space and access outcomes. The principles should set an expectation that there will be ring-fenced funding for natural asset management and there will be monitoring requirements and mandatory reporting for biodiversity and access outcomes. If New Towns fall short of these expectations enforceable remediation requirements should apply.

Question 18

Do you think the proposed planning policy provides sufficient flexibility to new town locations to meet the placemaking principles?

(Yes/**No**/Not sure)

If you answered no, what other measures could create a flexible approach to the placemaking principles?

Due to the recognised significant ecological impacts (highlighted by SEA) minimum environmental standards (including for BNG; energy efficiency and water efficiency) should not be flexible. Exactly how these can be achieved in a local context should be flexible to ensure the placemaking principle on environmental sustainability can be achieved.

Question 19

Is establishing a 40% target for affordable housing an effective way of delivering an ambitious number of affordable homes? (Yes/No/Not sure)

If you answered no, what changes to the target are needed?

No comment

Question 20

Is the proposed planning policy on giving substantial weight in decision making to the social and economic benefits of new towns clear?

(Yes/No/Not sure)

If you answered no, please provide your reasons.

Sustainable development as defined in the NPPF with regards to the planning system, sets out that the 3 overarching objectives are economic, social and environmental. Given that environmental benefits also deliver valuable eco-system services such as flood prevention, clean air and health and well-being benefits it is unclear why a balance of all 3 is not being promoted. Without a balance the New Towns will fail to deliver sustainable development, so the policy needs to be amended if the wider aspirations of the new town programme are to be achieved.

Question 21

Do you agree with the government's approach to decision making policy on the Green Belt?

(Yes/No/Not sure)

If you answered no, what further change to plan-making or decision-making policy are needed?

Policy must make it explicitly clear that New Towns must align with Local Plan policies particularly where protected landscapes, Local Wildlife Sites, heritage assets and Priority Habitats could be impacted. Many of these assets also overlap with Green Belt designations.

In particular plan-making and decision-making policies should consider the new Local Nature Recovery Strategies to ensure areas identified as opportunities for nature's recovery are taken into consideration.

Question 22

Do you think the proposed planning policy is sufficient for the purposes of safeguarding land for development as new towns.

No comment

If you answered no, how could the policy go further?

Question 23

Do you think any additional planning policies are needed to support the delivery of the programme objectives?

(Yes/No/Not sure)

If you answered yes, please provide details.

We believe that there should be a policy relating to the expected environmental standards on mitigation principles for protected and priority species, Biodiversity Net Gain, energy efficiency and water use. The policy should reflect current best practice.

The SEA Report sets out measures which are optional, vague and unambitious for example suggesting that 'consideration could' be given to going above 10% Biodiversity Net Gain minimum 'on occasion' or 'where circumstances allow'.

We urge Government to exclude New Town Development from BNG exemptions and set ambitious targets for BNG, such as a 30% target which could significantly help to deliver Local Nature Recovery Strategy ambitions in the vicinity of the New Towns.

Setting clear environmental standards will help ensure new towns meet their environmental sustainability objectives.

Question 24

Do you have any views on the potential impacts of the New Towns Draft Programme on people or groups with protected characteristics?

No comment

Question 25

Is there anything else you would like to tell us that you think is relevant to this consultation but has not been covered in previous questions?

There is a significant risk that due to the high biodiversity value of the proposed footprint of Adlington new town it will be difficult, if not impossible, to secure a Biodiversity Net Gain on site. This risks compensation for the development moving elsewhere, possibly out of the region.

Offsite compensation will make it challenging for the scheme to meet the BNG good practice principles. (CIRIA, CIEEM, IEMA, 2016) particularly principle 6 – "achieving the best outcomes for biodiversity".

The size of the development means that impacts on species and habitats will be profound and could potentially cause local extinctions, for example lapwing, skylark, curlew and European hare, whose populations have been significantly affected by development of Woodford aerodrome. At risk too are the rare species that use the estate, particularly hobby and the red listed birds associated with the woodland and hedgerows

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