

FORMAL CONSULTATION SUBMISSION

To: Cheshire East Council (Strategic Planning Team)

Regarding: New Local Plan Scoping Consultation

Date: September 1st 2026

Subject: Strategic Response Focus – Preventing Speculative Urban Sprawl, Safeguarding Agricultural Land Quality, and Eliminating Infrastructure Lag

Dear Strategic Planning Team,

I am writing to submit my formal comments regarding the Cheshire East New Local Plan Scoping Consultation. As a local stakeholder concerned with the long-term sustainable growth and environmental integrity of the borough, I wish to emphasize the necessity for the forthcoming Local Plan to establish robust, unambiguous spatial policies.

I am particularly concerned by the challenges arising from the proliferation of speculative residential housing applications that lack corresponding infrastructure support. Because the north of the borough benefits from highly restrictive environmental and Green Belt protections, development pressure has disproportionately gravitated toward Crewe and Nantwich. Recent years highlight the severe consequences of permitting burgeoning housing developments alongside inadequate infrastructure.

1. Prioritizing Brownfield-First Urban Regeneration Over Countryside Expansion

- **The Sprawl Threat:** The current map illustrating potential development sites threatens an unacceptable level of urban sprawl, causing unsustainable encroachment beyond historical settlement boundaries and into the open countryside. While national policy dictates a presumption in favor of sustainable development, many of these peripheral proposals fail basic sustainability metrics.
- **Core Regeneration:** The vision for the 2040s must explicitly entrench a brownfield-first development strategy. Crewe and its surrounding settlements require targeted urban renewal within their existing established footprints, rather than continuous, outward fracturing into open countryside.
- **High Policy Bar:** Speculative, large-scale peripheral developments place an unsustainable burden on existing public utilities and dilute the critical investment required to successfully regenerate our central urban cores. While some expansion may be required over the plan period, the policy bar to clear the open countryside threshold must be set exceptionally high to guarantee a livable and sustainable environment for residents and businesses.

2. Strengthening Strategic Green Gaps and Preventing Settlement Coalescence

- **Erosion of Identity:** The new Local Plan must formalize, broaden, and strictly enforce Strategic Green Gaps around Crewe, Leighton, and adjacent rural parishes. The physical

coalescence of distinct communities systematically erodes local character, strains village identity, and permanently fragments essential rural buffer zones.

- **Countering Speculation:** Protective policy boundaries must be legally tightened to decisively resist speculative applications that seek to exploit temporary five-year housing land supply deficits.

3. Elevating National Food Security and Enforcing Independent Land Quality Reviews

- **Geopolitical & Climate Realities:** A shifting global geopolitical landscape, combined with the imperative for climate resilience, renders the historical reliance on food imports entirely unsustainable. We can no longer assume uninterrupted global food supply chains—a vulnerability severely worsened by climate change.
- **The Cheshire Asset:** Local policy must proactively align with national security priorities by safeguarding food security and prioritizing net-zero objectives. Productive agricultural land is a finite, non-renewable asset providing invaluable regional economic and climate resilience. Cheshire is historically one of the most productive agricultural regions in the UK; safeguarding this land is a clear opportunity for Cheshire East to act as a vital pillar of the national rural economy.
- **Mandatory Independent Reviews:** The new Local Plan must reform how Agricultural Land Classification (ALC) is verified. Speculative applications routinely depend on developer-funded soil assessments that systematically downplay land grades to circumvent statutory protections. To address this conflict of interest, the new framework should mandate that all land classification claims undergo independent, third-party validation commissioned directly by the local planning authority and fully funded via developer levies. Food-producing acreage—including vital Grade 3b soils—must be strictly protected from permanent loss unless internal urban brownfield opportunities have been comprehensively exhausted.

4. Eliminating Community Stress by Mandating Infrastructure-Led Development

The new Local Plan must introduce rigid, legally enforceable triggers to end the destructive pattern of infrastructure lag. It is common practice for large-scale planning applications to promise new infrastructure to secure initial permissions, only for delivery to be systematically delayed for years until hundreds of residential units are occupied.

The new plan should institute clear Grampian-style policy conditions: zero occupancy authorizations must be granted past early, predetermined delivery thresholds until all accompanying strategic transport infrastructure, educational assets, and medical provisions are completely operational. Infrastructure must lead development, never follow it.

Critical School Provision Realities:

- **Current Capacity Deficit:** In and around Crewe, primary school occupancy is currently operating at approximately 103% (representing an 8–13% overload). This sits in stark contrast to the Department for Education (DfE) operational guidelines, which expect a 5–

10% margin of unused capacity to ensure basic school stability. Additional capacity must be brought into service before any further large-scale residential development takes place, and this capital cost must be fully funded by developers.

- **The Dedicated Schools Grant (DSG) Funding Crisis:** Cheshire East is historically one of the most poorly funded areas under the Dedicated Schools Grant. The funding formula, comprising a fixed lump sum plus a variable per-pupil amount, makes the proliferation of small, isolated primary schools financially inadvisable. Increasing the number of individual school lump sums dilutes the total pool of per-pupil funds, deeply disadvantaging children across the borough.
- **Strategic Aggregation:** Because statutory funding is shared strictly across Local Authority and academy sectors, this financial strain affects all school provision. The new plan must enforce a policy of aggregating primary school provisions across multiple adjacent developments, favoring larger, multi-form entries (e.g., 2FE or 3FE) to protect economic viability.
- **Delivery Reform:** The historical practice of securing Section 106 financial contributions has demonstrated limited success; legal and administrative complexities mean promised community contributions frequently fail to materialize. While central government aims to transition toward a standardized Infrastructure Levy, local policy must remain robust. The council should mandate direct, physical infrastructure construction by developers in preference to seeking financial contributions, which are highly complex to administer and routinely vulnerable to developer clawbacks or viability renegotiations.

5. Transport Infrastructure and Road Capacity Limits

All large-scale housing proposals in southern Cheshire East raise severe transport infrastructure concerns, primarily regarding highway capacity.

- **The A530 Bottleneck Corridor:** While developer interest is currently focused on the region around Leighton Hospital and Bentley, this entire northwest quadrant is served almost exclusively by the A530. This corridor is already severely constrained by notorious, daily bottlenecks at Alvaston to the south and the Middlewich canal bridge to the north. Overloading this already inadequate road provision does not serve the strategic interests of residents, Leighton Hospital, or major employers like Bentley.
- **Rail Integration vs. Highway Reality:** It is noted that proposals exist to open a new rail station near Leighton Hospital. While a compelling case can be made to support rail integration for a major regional medical centre, this intervention will have a negligible impact on localized traffic volumes. Residents, emergency services, and businesses will continue to rely heavily on the highway network. Therefore, any plan for major residential expansion in this quadrant must be legally dependent on prior, commensurate road upgrades.
- **Strategic Infrastructure Alignment:** Conversely, proposals to dual the road from M6 Junction 16 represent the type of strategic infrastructure that the council should champion. This dualling would act as a major improvement and sustainable growth driver, making the area south and east of Crewe highly attractive to logistics and high-value businesses, while supporting well-connected, sustainable housing developments with immediate links to the A500 corridor.

Conclusion

I urge the council to utilize this scoping phase to build definitive, proactive planning barriers that firmly insulate our open countryside, agricultural assets, and rural parishes from predatory, unsustainable urban sprawl.

Please provide a formal acknowledgment of receipt and confirmation that this submission has been officially registered and logged as part of the New Local Plan Scoping Consultation.

Yours faithfully,

Anthony Jones

