IM Land

Cheshire East Local Plan

Scoping consultation response – September 2026

01 September 2026

TETRA TECH

Document status

Approval for issue		
Issue	TA	25 August 206

This report was prepared by Tetra Tech within the terms of Tetra Tech engagement with its client and in direct response to a scope of services. This report is supplied for the sole and specific purpose for use by Tetra Tech's client. The report does not account for any changes relating the subject matter of the report, or any legislative or regulatory changes that have occurred since the report was produced and that may affect the report. Tetra Tech does not accept any responsibility or liability for loss whatsoever to any third party caused by, related to or arising out of any use or reliance on the report.

Prepared by	Prepared for
Tetra Tech	IM Land

Table of contents

1.0 Introduction 5
2.0 Section 3: Context for the new Local Plan 7
3.0 Section 4: Baseline information and spatial portrait 10
4.0 Section 5: Scope of the new Local Plan 11
5.0 Section 6: Proposed local plan engagement strategy 19

Appendices

Appendix A – July 2024 representations obo IM Land to Council's Issues Paper consultation

Acronyms/Abbreviations

Acronyms/Abbreviations	Definition
CEC	Cheshire East Council
HNA	Housing Needs Assessment
IDP	Infrastructure Delivery Plan
LHN	Local Housing Need
NPPF	National Planning Policy Framework
PPG	Planning Practice Guidance
SA	Sustainability Appraisal
SDS	Spatial Development Strategy
SEA	Strategic Environmental Assessment
SHLAA	Strategic Housing Land Availability Assessment
SPD	Supplementary Planning Document
TT	Tetra Tech Consulting Ltd

1.0 Introduction

1.1 These representations have been prepared by Tetra Tech Consulting Ltd ('TT') on behalf of IM Land ('the client'), [Redacted]. They respond to the Cheshire East Local Plan 'Shaping Cheshire East Together' Scoping Consultation ('the Scoping Consultation') issued by Cheshire East Council ('the Council').

1.2 Following the enactment of the Town and Country Planning (Local Planning) (England) Regulations 2026, the new plan-making system is now in force and it is under these regulations that the Council is preparing its Local Plan. The Government has also published the final version of the National Planning Policy Framework (NPPF), and Annex A confirms that from the date of publication (17 August 2026) development plan policies must not be materially inconsistent with national planning policy.

1.3 TT (formerly RPS) submitted representations on behalf of IM Land at earlier stages of Plan preparation, including a response to the Council's Issues Paper in July 2024 (included at **Appendix A).** The Council is invited to have regard to those representations where they relate to local matters and remain consistent with national planning policy.

1.4 This representation seeks to follow the structure of the Scoping Consultation, providing comments against the Council's corresponding headings where possible. Additional headings are included where TT consider these to be helpful in informing the scope of the new local plan for Cheshire East.

2.0 Section 3: Context for the new Local Plan

Increase in housing requirements

2.1 The new Local Plan should adopt a positive approach to housing growth within its Vision and Objectives that meets the housing needs of current and future residents of Cheshire East in full over the plan period.

2.2 The most up-to-date calculation of local housing need (LHN) for Cheshire East is 2,530 dwellings per annum (based on dwelling stock and affordability data on 22 May 2026), equivalent to 40,480 dwellings across the currently proposed 2029–2045 plan period. This is the minimum figure produced by the standard method and should be the starting point for the housing requirement, subject to updates arising from revised dwelling-stock estimates (usually released in May) and affordability ratios (usually released in March, next due March 2027).

2.3 In line with Policy HO2(3)(b) of the 2026 NPPF, the Council must consider whether an uplift to the LHN is needed to reflect the need for a range and choice of sites, flexibility, viability, alignment between jobs and new homes, unmet needs from neighbouring areas, and whether higher levels of market housing are required to support greater affordable housing delivery. TT expects each of these matters to be thoroughly tested through the Council's evidence base.

Economic growth

2.4 Policy HO2(3)(b) of the 2026 NPPF confirms that housing requirements should accommodate identified needs as a minimum and may be higher where necessary to reflect economic growth ambitions or infrastructure investment. The Scoping Consultation recognises this at paragraph 3.6. The Borough's role within the Cheshire and Warrington growth area, and the economic importance of Crewe, should therefore be given careful weight in the evidence base and in fixing the housing requirement. We also refer to our response to the Issues Paper in July 2024 (**Appendix A**) which identified that a housing requirement based on the minimum housing need runs counter to the recent strong trends in employment and housing growth in the district. Planning on the basis of a minimum housing need could restrict the provision of homes relative to growth in jobs and employment opportunities in

the district, which runs the risk of promoting more unsustainable travel patterns (more in-commuting) into and across the district. There is a clear justification to plan for 'higher than minimum' levels of growth in the new Local Plan.

Housing land supply and spatial strategy

2.5 The Council acknowledges that it cannot currently demonstrate a five-year supply of deliverable housing sites (currently 3.3 years over the period 2025/26 – 2029/30), and the adopted Local Plan Strategy is now over nine years old. Existing SHLAA evidence also confirms the limited capacity of brownfield land to accommodate the residual requirement. The Council should therefore acknowledge the need to allocate a range of sites, including greenfield sites.

2.6 The new Local Plan must respond through a positively prepared, evidence-led and deliverable spatial strategy, allocating sufficient sites to meet identified needs with the flexibility required to maintain delivery throughout the plan period. Beginning the plan period at the point of adoption (2029) risks disregarding existing unmet need; the Council should adopt an earlier start date – as a minimum from the commencement of the new Local Plan (2026), with an earlier date meriting consideration.

2.7 Policy S2 of the 2026 NPPF requires the Council to set out clear expectations for the location of development and where land should be protected or enhanced. The spatial strategy should be illustrated on a key diagram, with the boundaries of specific policy areas, land use designations and allocations shown on the policies map.

2.8 [Redacted]

Green Belt and Strategic Green Gap

2.9 TT welcome the Council's intention to undertake a Green Belt Assessment to identify grey belt land and inform future Green Belt release. The Council should also undertake a review of its Strategic Green Gaps. In reviewing Green Belt and Strategic Green Gap boundaries, it should be recognised that such land is often the most sustainable, viable and deliverable and can support a sustainable spatial strategy and the maintenance of a five-year supply of deliverable housing.

Spatial Development Strategy

2.10 The new Local Plan should also be aligned, where practicable, with the emerging Cheshire and Warrington Combined Authority Spatial Development Strategy (SDS), reflecting the inherent relationship between the SDS and Local Plans.

Strategic environmental assessment

2.11 TT supports the recognition that a Strategic Environmental Assessment is required to ensure the new Local Plan is legally sound and prepared in accordance with statutory requirements.

3.0 Section 4: Baseline information and spatial portrait

3.1 TT makes no comment on the statistical data on population and demographics within Section 4.

4.0 Section 5: Scope of the new Local Plan

Local Plan Period

4.1 A plan period of 2029–2045 is supported as a minimum. NPPF Policy PM2(1)(b) is clear that the 10-year minimum runs from the point of adoption, and that local plans can cover a longer time period where this would help support the delivery of longer-term infrastructure or strategic development. This is consistent with Planning Practice Guidance (Paragraph: 083 Reference ID: 61-083-20211004), which advises that larger-scale developments such as new settlements or significant extensions should be set within a vision looking at least 30 years ahead.

4.2 Annex B of the 2026 NPPF defines a 'strategic site' as one for residential, commercial or mixed-use development that would be implemented in multiple phases, have significant infrastructure requirements and require a masterplan; typically, for a residential-led development, strategic sites would have capacity for at least 1,500 dwellings. Given the scale of the LHN uplift, strategic site allocations are highly likely to be required. A longer plan period would accommodate lead-in times for infrastructure, support the masterplanning and phasing of larger sites, and provide investment certainty.

4.3 The Council's own recognition that a longer plan period can support longer-term planning is welcomed however TT also has concerns that by setting the beginning of the plan period at the point of adoption (2029), it ignores the current unmet need that is taking place in Cheshire East now. Instead, the Council should set an earlier start date to its plan period to seek to meet some of this existing shortfall. This should, as a minimum, be from the start of the preparation of the new Local Plan (2026) but consideration could be given to an earlier date.

Creating a vision and objectives

4.4 Policy PM2(1) of the 2026 NPPF is clear that Local Plans should provide a positive vision and spatial strategy and should articulate how the area will change over the plan period, while Policy PM9(2)(d) requires plans to be underpinned by an assessment identifying appropriate sites for development, taking into account the emerging vision and spatial strategy.

4.5 The Vision should therefore be spatially driven, providing a clear framework for the distribution and form of development across the Borough. It should move beyond generic aspirations and set out a meaningful, place-based direction capable of guiding decisions on growth. Successful outcomes to be achieved by the end of the plan period should include:

- local housing need being met in full;
- households unable to access market housing being able to access affordable housing, reducing waiting lists and improving affordability;
- delivery of a genuine choice and mix of housing that meets the needs of all groups, supporting a more balanced population;
- the delivery of high-quality, sustainable development supported by timely investment in physical, social and community infrastructure;
- the provision of accessible green infrastructure, public open space, recreation facilities and opportunities to support health and wellbeing;
- development contributing towards the enhancement of biodiversity, ecological networks and environmental quality, including the delivery of measurable Biodiversity Net Gain;
- the promotion of sustainable travel choices and improved connectivity within and between communities; and
- support for the viability and vitality of rural villages and larger settlements alike.

Planning for growth

4.6 TT supports the Council's recognition that the amount of development to be planned for will be informed by evidence including future housing and employment needs, infrastructure capacity, environmental constraints and opportunities for regeneration. Affordability should also be treated as a determinative factor in setting the scale of development to be planned.

Identifying and assessing sites

4.7 TT supports the preparation of a comprehensive and transparent Land Availability Assessment to inform future allocations. The Council confirms that submitted sites

will be assessed against suitability, availability and deliverability, with the methodology including an initial filter, assumptions on development potential and delivery timescales, and site scoring.

4.8 NPPF Policy PM9 requires plans to identify a sufficient range and quantity of potential development sites and to assess their availability, suitability and achievability, including viability. The assessment should focus on the actual planning merits and deliverability of sites, rather than treating existing policy designations as a proxy for suitability. This is particularly important where designations such as the Strategic Green Gap are themselves under review.

4.9 Existing policy designations should not be used as an overly restrictive initial filter; the assessment should be undertaken on a 'policy-off' basis in the first instance. In particular, land within the existing Strategic Green Gap or Open Countryside should not be treated as inherently unsuitable prior to consideration of its individual characteristics and the outcomes of the Strategic Green Gap Review.

4.10 The site-selection methodology should assess the merits and deliverability of individual sites on their evidence, including the capacity for constraints to be addressed through design and mitigation, rather than treating an existing policy designation as determinative.

Strategic Green Gap

TT strongly supports the Council's intention to undertake a review and prepare further evidence on the role and function of the existing Strategic Green Gap and how it should operate in the future. This is particularly important because, as the Council acknowledges, Strategic Green Gaps are a locally derived planning designation rather than one defined through national policy. The review should not

4.11 assume that the existing extent of the designation remains appropriate. Instead, it

should establish which individual components and structural landscape features perform the functions of preventing coalescence and maintaining settlement identity.

4.12 The publication of the August 2026 NPPF provides further support for a proportionate review of the Strategic Green Gap. Policy S2(1)(c) confirms that designations intended to safeguard separation between settlements should only be used where necessary to maintain settlement identity and physical separation and should be no larger than required to achieve that purpose. The Council's review should therefore critically assess whether all land presently included within the Strategic Green Gap continues to perform that function and whether more tightly defined boundaries could achieve the same policy objective whilst enabling sustainable development opportunities to contribute towards meeting identified housing needs.

Settlement hierarchy

4.13 TT supports the review of the settlement hierarchy, including the Council's proposed consideration of services and facilities, population, employment, sustainable transport, retail provision and settlement form. The assessment should consider not only the existing role of settlements but their capacity to accommodate growth sustainably, and associated infrastructure, over the plan period. Crewe should continue to perform as one of two Principal Towns in accommodating development.

Spatial distribution

4.14 The spatial distribution of growth should be established principally by the need to meet identified development needs in sustainable and deliverable locations. The Council anticipates that the scale of development required will mean edge-of-settlement growth, larger urban extensions and potentially new settlements. No single source of supply is likely to provide an adequate or resilient strategy.

4.15 A strategy that creates sustainable opportunities adjoining Principal Towns, where new development can make use of existing infrastructure while delivering improvements to services and facilities, is one the Council should fully explore. The Gresty Lane Site is an example of such an opportunity, capable of providing housing alongside a new primary school, extensive public open space, walking and cycling infrastructure and other community benefits.

Development in the countryside

4.16 The treatment of development within and outside settlements is clearly defined in the 2026 NPPF and does not need to be replicated in the Local Plan. If this section is intended to relate solely to isolated rural development, that should be made explicit.

4.17 The Council will still need to determine what should be classified as 'in settlements' and what should be classified as 'countryside'. The Council should avoid the use of overly restrictive settlement boundaries/development limits which could hamper and restrict future growth options in key settlements. For this reason, the Council should recognise that sites which are adjacent to and well-related to existing settlements may also be sustainable options for growth and meeting housing needs. Therefore, having a flexible approach to settlement boundaries/development limits will assist with boosting windfall development and introduce additional flexibility into the Council's future housing supply.

Housing

4.18 TT is supportive of the Council in undertaking a Housing Needs Assessment ("HNA") and considers that this is a key part of the evidence base of the new Local Plan. It will be important that in translating its outputs into policies, that a degree of flexibility is maintained.

Affordable housing

4.19

The new Local Plan will need to be clear on the quantum of affordable housing required across different areas of Cheshire East. This should be informed by the HNA, taking into account variations in affordability, housing need and market conditions across the Borough. The Council should consider whether a more granular, geographically differentiated approach to affordable housing requirements is justified, ensuring that policy requirements respond appropriately to local circumstances. The Council's whole-plan viability work should assess the appropriate level of affordable housing having regard to local market conditions, other planning obligations and policy costs, ensuring that requirements do not undermine the delivery of planned development.

4.20 Tenure requirements should be flexible enough to respond to site-specific circumstances, viability, and Registered Provider requirements (including mortgagee-in-possession clauses), and should be capable of adapting as needs shift over the plan period.

4.21 Historically, affordability has been a challenge across many parts of Cheshire East, with the Borough regularly featuring as one of the least affordable in the north-west of England. Consequently, the new Local Plan should consider the relationship between housing delivery and affordability outcomes. As recognised by national policy, increasing overall housing supply can play an important role in improving affordability and supporting the delivery of affordable housing. The Council should therefore consider whether an uplift above the minimum housing requirement is justified in order to support economic growth ambitions, improve affordability and facilitate the delivery of additional affordable homes.

Housing Mix

4.22 Any forthcoming HNA will likely set out the broad housing requirements of different groups across Cheshire East. TT considers that its findings should inform rather than prescribe an inflexible dwelling mix for individual sites. The Council itself recognises that requirements may need to respond to changing household sizes, affordability pressures, an ageing population and individual development sites. Site characteristics, local need, design considerations and changes in market conditions over the plan period should therefore remain relevant considerations.

Housing standards

4.23 IM Land support the Council's review of housing standards, including accessibility, water efficiency and nationally described space standards. Such standards play an important role in ensuring new homes meet the needs of current and future residents, whilst also supporting the Government ambition within Chapter 14 of the August 2026 NPPF to promote high quality, healthy, inclusive and sustainable places. However, any policy requirements relating to housing standards should be tested through the Council's viability assessment to ensure that they do not undermine the deliverability of planned housing growth.

4.24 In accordance with Policy PM13 of the August 2026 NPPF, any locally applied standards should be proportionate, evidence-led and avoid unnecessary duplication of matters addressed through Building Regulations. The Council should also recognise that housing needs, technologies and market conditions may evolve over the plan period and therefore policies should retain an appropriate degree of flexibility.

Climate Change Adaptation and

4.25 IM Land support the Council's intention to consider policies relating to climate change adaptation. Appropriate adaptation measures can improve the resilience of new development to the effects of climate change, including overheating, flood risk, water scarcity and extreme weather events. The Local Plan should support outcomes-based policies that encourage resilient design, sustainable drainage systems, urban greening and water efficiency measures, whilst retaining sufficient flexibility for developers to respond to site-specific circumstances and evolving technologies. Any requirements should be supported by proportionate evidence and tested through the whole-plan viability assessment.

Reducing carbon emissions

4.26 IM Land agree that the Local Plan can play a role in supporting the Government's net zero strategy and national standards. Policies should focus on clear sustainability outcomes while retaining flexibility for schemes to respond to site circumstances, technological change and infrastructure availability. This approach is consistent with the Written Ministerial Statement of December 2023 (UIN HCWS123), which confirms that Government does not expect plan-makers to set local energy efficiency standards beyond current or planned Building Regulations, and with Policy PM13 of the August 2026 NPPF, which permits local energy efficiency standards that exceed Building Regulations only where supported by a clear and robustly costed justification demonstrating no adverse impact on viability and deliverability.

Recreation and community facilities

4.27 The new Local Plan should be sufficiently flexible to enable provision to respond to evidenced local needs, through an appropriate combination of on-site provision,

multifunctional green infrastructure and contributions towards existing facilities where there is, or will be, insufficient provision over the plan period.

4.28 The Council's intention to review standards for open space, parks, playing pitches and other recreational provision is supported in principle. Any local standards should be founded on an up-to-date assessment of existing provision, deficiencies and future needs, drawing on relevant national standards and best practice, tailored to Cheshire East's circumstances and tested alongside all other policy requirements.

Local Plan evidence base

4.29 A robust and up-to-date evidence base is fundamental to preparing the new Local Plan. The Evidence Base listed in the Scoping Consultation appears comprehensive; equally important is timing. The HNA, Land Availability Assessment, Viability Assessment and IDP should be front-loaded, as they will shape the plan's housing policies and reduce the likelihood of significant changes at later stages. These documents should be kept up to date throughout preparation of the Local Plan, with any changes reflected consistently across the evidence base.

5.0 Section 6: Proposed local plan engagement strategy

5.1 TT has no substantive comments on the proposed engagement strategy for the Local Plan. TT support the Council's approach insofar as:

- It is clear how and when people can take part;
- Feedback is recorded and reported in a transparent way;
- The results of consultation are shared openly; and
- The local plan timetable is kept up to date.

Appendix A – July 2024 representations obo IM Land to Council's Issues Paper consultation

NEW LOCAL PLAN FOR CHESHIRE EAST: ISSUES PAPER

response on behalf of IM Land (IML)

794-PLN-MNP-00153
17 June 2024

rpsgroup.com

Document status

Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
draft	Representations	DRO	PH	PH	1 July 2024

Approval for issue

Paul Hill  17 June 2024

The report has been prepared for the exclusive use and benefit of our client and solely for the purpose for which it is provided. Unless otherwise agreed in writing by R P S Group Limited, any of its subsidiaries, or a related entity (collectively 'RPS') no part of this report should be reproduced, distributed or communicated to any third party. RPS does not accept any liability if this report is used for an alternative purpose from which it is intended, nor to any third party in respect of this report. The report does not account for any changes relating to the subject matter of the report, or any legislative or regulatory changes that have occurred since the report was produced and that may affect the report.

The report has been prepared using the information provided to RPS by its client, or others on behalf of its client. To the fullest extent permitted by law, RPS shall not be liable for any loss or damage suffered by the client arising from fraud, misrepresentation, withholding of information material relevant to the report or required by RPS, or other default relating to such information, whether on the client's part or that of the other information sources, unless such fraud, misrepresentation, withholding or such other default is evident to RPS without further enquiry. It is expressly stated that no independent verification of any documents or information supplied by the client or others on behalf of the client has been made. The report shall be used for general information only.

Prepared by:

RPS

Prepared for:

IM Land

Contents

1 INTRODUCTION 3
2 HOMES FOR EVERYONE 4
3 HEALTHY AND SAFE COMMUNITIES 10
4 TRANSPORT AND INFRASTRUCTURE 11
5 TOWNS AND VILLAGES 14
6 RURAL MATTERS 17

1 INTRODUCTION

1.1 The *New Local Plan for Cheshire East: Issues Paper* ('IP') represents the starting point for consultation and engagement with interested parties on the new Local Plan, including those from the development industry operating in the district.

1.2 IM Land (IML) has interests in the district and therefore wishes to engage with the Cheshire East Council (CEC) on the new Local Plan. RPS has therefore been commissioned to prepare responses to the Issues Paper for the New Local Plan in Cheshire East District on behalf of IM Land.

1.3 The responses in this submission broadly follow the questions as they are set out in the IP document and responds to those matters of relevance to IML.

Potential plan period

Question 1a What date do you think the new local plan period should run to, giving reasons why you think it would be appropriate?

1.4 As CEC allude to in the IP (para 1.17) current national planning policy states that strategic policies should look ahead over a minimum 15 year period from adoption[1]. CEC indicates that the earliest possible end date for the new Local Plan would likely be 2043, but that the Plan could look further ahead (for example, to 2045 or 2050) in line with local aspirations and national targets regarding the move to net zero.

1.5 We take the view that a 20-year plan period is reasonable, which would be consistent with the current adopted Local Plan timeframe (2010-30) and the current growth strategy focused on the principal towns, including Crewe.

[1] NPPF, para 22

2 HOMES FOR EVERYONE

The need for new homes

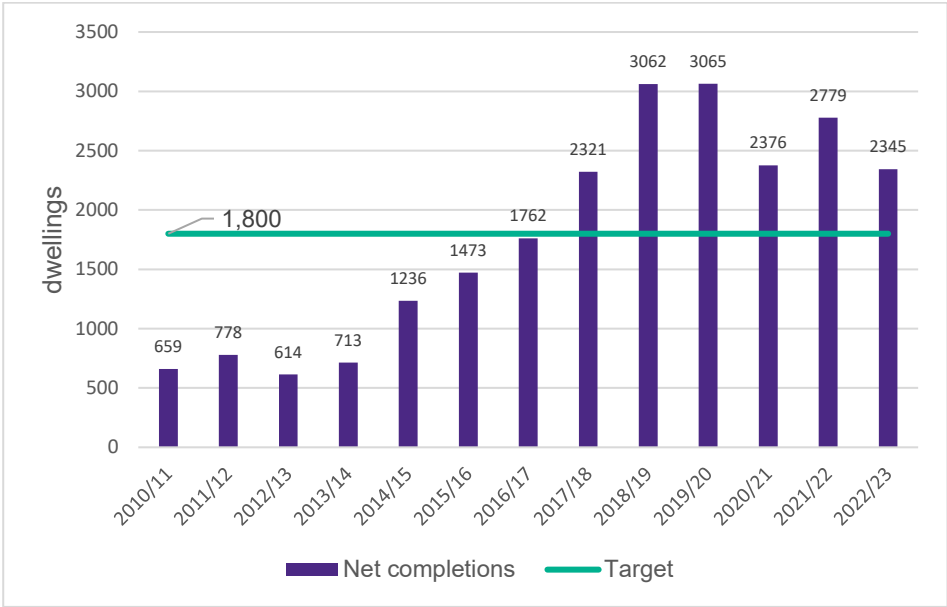
Question 6a Should the standard method calculation of 1,014 new homes per annum be used when preparing the new local plan? If not, what are the circumstances that would warrant a different approach?

2.1 Paragraph 20 of the NPPF says that strategic policies should set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision11 for housing, including affordable housing.

2.2 Paragraph 6.1 of the IP document says that a key role of the local plan is to provide a strategy to help meet the housing needs of Cheshire East in terms of the quantity, size, type and tenure of new homes, and it will aim to ensure that the housing needs of all types of households are provided for in a sustainable manner. We broadly welcome this intention. We also welcome the Council's recognition (at para 6.4) that local authorities may wish to deliver more homes than the minimum housing need figure calculated using the standard method, and that robust evidence is required to justify departing from (planning for less growth) than the minimum need would suggest.

2.3 The Council says (at para 6.5) that the local housing need figure for Cheshire East is currently 1,014 dwellings per annum (dpa). Paragraph 67 of the NPPF states the housing requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment. In this context, the Council should give proper consideration to planning for housing over and above the minimum needed based on the standard method calculation, for the reasons set out below.

Figure 2-1 Net Completions against housing requirement (annual) – Cheshire East



Source: CE AMR 2022/23

2.4 Policy PG1 of the Cheshire East Local Plan Strategy makes provision for a minimum of 36,000 dwellings (or 1,800 dpa) between 2010 and 2030. Adopting a housing requirement based on the minimum 1,014 dpa figure would represent a substantial reduction in planned growth compared to the adopted Local Plan, which was only adopted in July 2017.

2.5 The rate of housing completions (net) in Cheshire East has also outstripped the minimum homes required, notably since the Local Plan was adopted. A summary of recent housing delivery is shown above (Figure 2.1) based on data from the Council's Annual Monitoring Report (AMR). The strong performance in housing delivery seen in recent years is no doubt attributable to the adoption of the Local Plan, but is also an indicator of the overall strength in demand for housing within the district. There are no indications from the IP document that this is likely to dissipate in the coming years.

2.6 Another important factor when planning the future housing growth is employment. This is significant because delivering an appropriate balance between the provision of new homes and jobs will help achieve sustainable development in the district. It was an important factor that also underpinned the soundness of the 36,000 requirement figure and was a matter considered in considerable detail by the Local Plan Inspector. In his final report, the Inspector (Mr Stephen Pratt) stated, at paragraph 58 of his final report[2]:

> "*58…The resulting OAN incorporates an uplift of some 65% above the base demographic need (22,000 homes), to reflect the proposed economic growth rate (0.7% jobs growth/year) and the need to provide sufficient homes for the employees needed to take up the additional 31,400 new jobs proposed; CEC considers that this is more than enough to reflect market signals, the need for affordable housing and other social, economic and housing factors*." (RPS emphasis)

2.7 Paragraph 8.8 of the adopted Local Plan qualifies the growth rate as a 'average' annual rate of increase in jobs. Put simply, it is clear that the 36,000 dwelling requirement was intended to support an expected annual average jobs growth rate of 0.7% per annum between 2010 and 2030. On this basis the Inspector concluded the Local Plan was sound stating, at paragraph 63:

> *"63. Having considered all the evidence…I conclude that CEC has reached a reasonably balanced judgement about the relationship between new jobs and homes, which is supported by the evidence and would result in sustainable levels of migration and commuting and patterns of development, in line with the guidance in the NPPF and PPG [ID-2a-018]. A housing requirement figure of 36,000 new homes (2010-2030) is therefore soundly based, and no new or compelling evidence is available which alters these conclusions."* (RPS emphasis)

2.8 In this context, it is helpful to analyse what has happened in terms of jobs growth in Cheshire East during the plan period to date, based on labour market statistics[3]. Data published by Office for

[2] Cheshire East Council – Cheshire East Local Plan Strategy – Inspector's Report: June 2017

[3] https://www.nomisweb.co.uk/

Statistics[4] indicates that the number of jobs in Cheshire East increased by 30,000 between 2010 and 2022, from 189,000 to 219,000. This represents a compound average growth rate (or CAGR) of 1.24% per annum over that period. The output and formula applied is summarised below.

Figure 2-2 CAGR, jobs, Cheshire East 2010-2022 (Nomis)

Dataset	Inputs	Formula
Jobs 2010	219,000	
Jobs 2022	189,000	
Years	12	
CAGR 2010-2022	1.24%	(Jobs 2010/Jobs 2022)^(1/12 years)-1
CELPS average jobs growth	0.7%	

Source: ONS; RPS

2.9 It can be seen that the average jobs growth rate in Cheshire East has exceeded significantly the expected growth in jobs which underpinned the housing requirement in the Local Plan. Similarly, the increase in 30,000 jobs only cover the period to 2022, compared to the 31,400 jobs expected across the whole plan period to 2030. It is reasonable to conclude that the strong growth in jobs correlates with the higher rates of completions in homes seen in the district between 2017/18 and 2022/23. This is also evidence of the strength in the local jobs market and underpins Cheshire East's importance to the economy locally and in the wider northwest region.

2.10 Adopting a housing requirement based on the minimum housing need runs counter to the recent strong trends in employment and housing growth in the district. Similarly, planning on the basis of a minimum housing need could restrict the provision of homes relative to growth in jobs and employment opportunities in the district, which runs the risk of promoting more unsustainable travel patterns (more in-commuting) into and across the district. There is a clear justification to plan for 'higher than minimum' levels of growth in the new Local Plan.

2.11 Taken together, the Council should consider adopting a new housing requirement that exceeds the minimum housing need figure under the standard method in order to support employment growth in the district, as illustrated by recent growth trends. Consequently, the standard method figure should only be the starting point, and not the end point, in determining the appropriate scale of growth to be planned for in the new Local Plan. This would align with paragraph 67 of the NPPF, which would allow the Council to plan for higher growth over and above the minimum housing need.

[4] Total Jobs (Jobs Density) Cheshire East district

Housing type and sizes

Question 6b How could the local plan influence the mix of housing sizes within new developments?

2.12 Paragraph 60 of the NPPF says that the overall aim [of the Plan] should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community.

2.13 The IP document (at paragraph 6.8) highlights the current local plan housing mix, however this was based on evidence (SHMA 2015) that is likely to be dated and may not be a suitable basis for the policies in the new Local Plan. These are matters that need to considered as the new Local Plan moves forward. The Council needs to prepare an up to date assessment of housing need for all households to underpin any proposed policies dealing with housing mix, in accordance with paragraph 63 of the NPPF.

Question 6e

How could the local plan support the delivery of small and medium sized housing sites in Cheshire East?

2.14 We are supportive of the inclusion of at 10% of the housing requirement on small and medium sized sites; this complies with paragraph 70 of the NPPF. Nonetheless, paragraph 69 of the NPPF also says that the mix and make-up of sites proposed for allocation in the new Local Plan must be suitable, available and achievable (economic viability). Small and medium sized site should also ensure that they support the wider objective of achieving sustainable development.

2.15 In this context, the Council also should take into account the social and economic benefits that new housing can bring to an area, alongside the assessment of suitability as part of the site assessment and selection process as the new Local Plan moves forward.

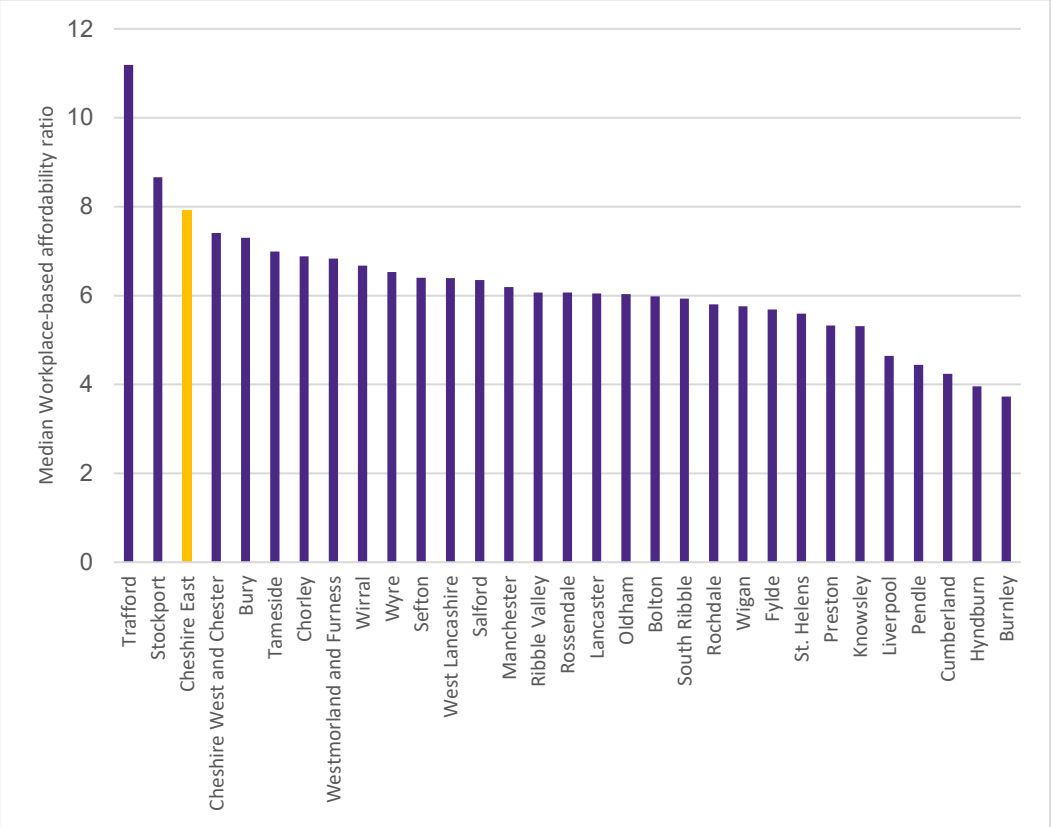
Affordable Housing

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

2.16 The IP document (paragraph 6.21) says that the new local plan will consider the need for affordable housing and the different types, and a new housing needs assessment will be prepared. It is unfortunate that the Council has not published an updated strategic housing market assessment (SHMA) or affordable housing need assessment to accompany this consultation stage.

2.17 As highlighted under question 6a, national policy says that strategic policies should make sufficient provision for affordable housing[5]. The IP document accepts that housing affordability in the district is a 'challenge for many households' (quoting house prices as being currently 8.14 median gross incomes). It is helpful to consider housing affordability in Cheshire East in the wider geographical context. This is summarised below, which shows the relative affordability of housing across the north-west region. Cheshire East is highlighted separately.

Figure 2-3 Cheshire East is one of least affordable places to live in the north west of England (mid-2023)



Source: Ratio of median house price to median gross annual (where available) workplace-based earnings by local authority district, England and Wales, 1997 to 2023 (Table 5c)

2.18 As demonstrated above, Cheshire East is currently the 3rd least affordable local authority area in the north-west of England. Consequently, the new Local Plan should encourage the provision of affordable housing as part of the wider provision of housing in the district.

2.19 Plans should also set out the contributions expected from development, which should include setting out the levels and types of affordable housing provision required. Importantly, such contributions should not undermine the deliverability of the plan.

2.20 Consequently, it is important that the new policy approach for addressing affordable housing need in the new Local Plan is both responsive to need, but also deliverable. A suitable means to address the need for affordable housing in Cheshire East is to consider an uplift to the housing

[5] NPPF 2023, para 20

requirement in order to facilitate the allocation of additional land to meet the affordable need. This would then reduce the pressure on individual sites to deliver higher proportional contributions towards affordable housing, which may otherwise undermine the overall deliverability of housing development. This would result in more housing being delivered in more timely manner, a key objective of Government[6].

2.21 Accordingly, the Council should consider allocation additional land to address the affordable housing need in Cheshire East, rather than seeking to elevate or inflate the affordable housing thresholds to be delivered on fewer sites.

Housing standards

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

Question 6l Should the next local plan require all new homes to meet the nationally described space standard and, if not, why?

2.22 Paragraph 135 of the NPPF says that planning policies (and decisions) should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users. Footnote 52 then explains that policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties; policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified.

2.23 Policy HOU8 of the existing Site Allocations DPD refers to the optional technical requirements in Part M of the Building Regulations (M4(2) and M4(3)(2)) regarding accessible and adaptable homes and, in addition, encourages proposals for residential development to meet the Nationally Described Space Standards.

2.24 Any new policy approach in the new Local Plan which is intended to set requirements for space standards and accessibility of dwellings will need to be justified by an up to date evidence base that has been tested through consultation and at examination, in accordance with national policy. This requirement is at least recognised in the IP document (at paragraph 6.29).

[6] NPPF 2023, para 75 and 79

3 HEALTHY AND SAFE COMMUNITIES

Open space and recreation

Question 3a Given the importance of open space for everyone, are there any specific approaches that the local plan should consider?

3.1 Paragraph 96 of the NPPF says that planning policies and decisions should aim to achieve healthy, inclusive and safe places and beautiful buildings which enable and support healthy lifestyles, especially where this would address identified local health and well-being needs, which includes sports facilities. The IP document also says that open spaces and the opportunities they offer are highly valued by the community and link crucially with both physical and mental health. We agree with this approach.

3.2 The *Cheshire East Playing Pitch & Outdoor Sport Assessment Report: Full Assessment Report (2024*) has been prepared by Knight Kavanagh & Page. The report says that based on current demand at a Borough-wide level, there is a theoretical shortfall of at least 7.5 full size 3G pitches to meet football training requirements, increasing to 8.25 when accounting for future demand. Furthermore, the report highlights that if future demand from population projections and club aspirations is realised, this will further increase 3G requirements for both football and rugby union.

3.3 In this context, the report also highlights (at page 79) that around two thirds (64%) of those clubs who use 3G pitches are currently training on pitches but do not have capacity for all of their teams, or do not have access at preferred times, with this stated as an issue. The report specifically highlight these issues as being evident at Alexander Soccer Centre, Crewe. It is therefore incumbent on the new Local Plan to include policies that support improvements to existing sports facilities, including Alexander Soccer Centre, alongside policies to encourage increased provision where viable and deliverable. This should also include establishing a positive policy framework which supports additional or enhanced sports facilities brought forward in association with new housing growth in the area.

4 TRANSPORT AND INFRASTRUCTURE

4.1 MEC consulting have provided responses to questions 9a and b, and assisted with 9c.

Active travel

Question 9a How can we support active travel through policies in the new local plan?

4.2 The council could consider the development of a specific Active Travel Strategy which could then be related into specific policies as part of the new Local Plan. Polices should encourage the provision of walking and cycling routes as well as embracing other forms of wheeled activity. However, policies should avoid being overly perspective on distances and specific design requirements.

4.3 All policies should reflect the differing requirements between urban and rural areas ensuring consistency with Para 109 of the NPPF.

Public Transport

How can public transport be supported through policies in the new local plan?

4.4 The new Local Plan should respond to the changing nature of bus services and in particular the growth of Demand Response transport which can provide a more flexible approach and complement existing services. Rigid public transport requirements should be avoided to ensure flexibility in approach to account for the location of development and the types of bus service available. Developer funding for public transport improvements should still be encouraged but policies should seek to ensure funding measures are costed either via the council or through the provision of business plans from developers to an agreed specification.

4.5 In addition, links to Crewe train station should be encouraged especially for developments in Crewe.

Car parking

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

4.6 The Council has published a High Level Parking Strategy (2017) for Cheshire East which seeks to manage on and off street parking (to positively affect the capacity and flow of the road network), whilst encouraging more sustainable travel patterns where these alternatives are available. The parking standards that the Council currently applies to new development is set out in Appendix C of the Local Plan Strategy. These represent minimum standards for residential development and recommended levels for other uses.

4.7 The existing parking standards sets out the parking standards that the Council applies to new developments. The standards do not provide a specific minimum or maximum provision for leisure

uses (Use Class D2), but refers to separate guidance[7]. This represents a flexible approach that is broadly welcomed, and which should be retained in the new Local Plan.

4.8 The High Level Parking Strategy Cheshire East (2017) also recognises that effective management of both on and off street parking can have a significant effect on the capacity and flow of traffic on the road network, and that well managed parking can have a positive environmental effect, making towns attractive with the resultant impact on local economic viability. However, these considerations are not reflected in the current parking standards or the relevant policies in the adopted Local Plan (Policy CO 2).

4.9 We would recommend that the parking strategy is updated to reflect the benefits that an effective traffic management system can bring to the transport network and the positive benefits for local communities, in terms of environmental improvements resulting from reductions in local traffic congestion. Furthermore, the relevant policies in the new Local Plan should also reflect on the advice in the parking strategy on effective traffic management.

4.10 Furthermore, for cycle parking, there is no reference in the current parking standards to houses or the types of spaces required, which is an omission that should be corrected as part of the next stage of the Plan.

Infrastructure

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

4.11 Yes.

4.12 National policy says that the purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner[8]. Similarly, identifying and coordinating the provision of infrastructure is an important element under the economic dimension of sustainable development[9]. Strategic policies should also make sufficient provision for community facilities[10]. Importantly, planning policies should seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment[11].

4.13 We welcome the Council's recognition in the IP document (at paragraph 9.21) that, in preparing a new local plan, it is important to understand what new and improved infrastructure is required to

[7] Cheshire East Parking Standards Guidance Note

[8] NPPF 2023, para 7

[9] NPPF 2023, para 8

[10] NPPF 2023, para 20

[11] NPPF 2023, para 86

overcome existing issues and help accommodate any proposals for growth in the borough. We also welcome the decision to prepared a new Infrastructure Delivery Plan (IDP). This approach broadly aligns with national policy on the provision of infrastructure outlined above.

4.14 In this context, it is important that the new Local Plan and the new IDP provides for the delivery of improved infrastructure to address known problems in the Borough. One such issue currently impacts on the provision of sports and leisure infrastructure at the Alexandra Soccer Centre managed by Crewe Alexandra Soccer & Community Association (CAC). We are aware that these issues are explained in more detail in separate representations made by CAC to this consultation paper.

5 TOWNS AND VILLAGES

A hierarchy of settlements

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

5.1 Paragraph 11.4 of the IP document says that the new local plan will need to review and update the existing hierarchy of settlements in the current plan. The IP document highlights the current plan which identifies Crewe as one of two Principal towns (alongside Macclesfield) where significant development will be encouraged to support their revitalisation, recognising their role as the most important settlements in the borough. Importantly, development (at Crewe) will maximise the use of existing infrastructure.

5.2 The methodology for the review of the existing hierarchy is set out in the *Settlement hierarchy (draft methodology) March 2024* topic paper, which includes a 'potential' structure for a new settlement hierarchy at table 3.1. Table 3.1 highlights 'Principal towns' in Tier 1 of the hierarchy. This is consistent with the existing hierarchy. However, neither the IP document nor the settlement hierarchy paper identifies which settlement would fall into which tier.

5.3 We support the continued designation of Crewe as a 'Principal town' in the new Local Plan, which clearly remains one of the largest, most prominent settlements in the borough with the largest populations which serves a large catchment area, and where a significant proportion of future growth should be directed.

Meeting our future development needs

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

Question 11d 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?

5.4 These questions relate to the distribution of development that might be taken forward in the new Local Plan. Paragraph 11.12 outlines three broad issues that might influence the distribution; namely, housing demand and other related factors; landscape and environmental factors; and availability and viability of brownfield sites.

5.5 We do not wish to challenge the various issues identified in the IP document, as these are all of relevance to the process of considering a suitable and justified distribution of growth in the new Local Plan. Nonetheless, the Council should also consider how directing growth could assist in improving or enhancing the provision of infrastructure available to local communities, and not to simply use existing infrastructure capacity as a reason to constrain growth in certain parts of the

district. This approach is consistent with national policy and the need to align growth and infrastructure when preparing Plans[12].

5.6 On site selection, paragraph 11.16 of the IP document refers to the previous site selection process used to inform the Site Allocations DPD, which includes factors such as accessibility to important services and facilities, and also existing designations (strategic green gaps). In our experience, there is a tendency for local authority site assessment work to follow the 'existing grain' which seeks to apply existing policy designations as a constraint, or would score sites less favourably to other sites but which may potentially not be able to deliver the same level of benefits.

5.7 Government practice guidance (PPG) provides advice for how local authorities should assess the potential for sites to deliver sustainable development[13]. The PPG points out that a site can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated. Similarly, when assessing sites against the adopted development plan, plan-makers will need to take account of how up to date the plan policies are and consider the relevance of identified constraints on sites / broad locations and whether such constraints may be overcome. When using the emerging plan to assess suitability, plan-makers will need to account for potential policy changes or other factors which could impact the suitability of the site / broad location. For example, an emerging site allocation may enable development to come forward. This will have to be reflected in the assessment of achievability[14].

5.8 In light of the guidance above, we would encourage the Council to use the new Local Plan as an opportunity review the appropriateness of existing designations, particular local designations which may otherwise constrain or restrict the potential for development where clear benefits could be secured for local communities. This includes those sites currently located within strategic green gaps (Crewe – Shavington) where development is restricted, including areas on the south of Crewe.

Community facilities

Question 11e How can the local plan support existing and/or proposed community facilities?

5.9 Paragraph 11.18 of the IP document says that community facilities can make a positive contribution to the social or cultural life of the community and are important to the communities that they serve, and they improve the sustainability of towns. We agree.

5.10 Paragraph 97 of the NPPF also says that to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should plan positively for the

[12] NPPF 2023, para 11a

[13] Housing and economic land availability assessment - GOV.UK (www.gov.uk)

[14] Paragraph: 018 Reference ID: 3-018-20190722 Revision date: 22 07 2019

provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments.

5.11 However, the IP document under this question does not specifically acknowledge sports venues as being one form of community facility. The new Local Plan will need to include policies that seek to support and enhance community provision in the district, including sport and recreation facilities, in accordance with national policy. Such facilities include the Alexandra Soccer Centre, Crewe, which is an important community asset in the district.

5.12 In supporting and enhancing local provision of community facilities, such as sports venues, any policy approach taken forward should include positively worded criteria which is supportive of those proposals where such enhancements can be secured as part of major residential development (through on-site provision, or via off-site contributions related to the proposal site). This approach aligns with national policy[15] which encourages an integrated approach to considering the location of housing, economic uses and community facilities and services.

[15] NPPF 2023 para 97(e)

6 RURAL MATTERS

Strategic green gaps

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

6.1 To help inform the response to this question, Stantec have reviewed the information in the IP document and provided their advice.

6.2 Paragraph 12.15 of the IP document refers to the current Local Plan which identifies a number of 'Strategic Green Gaps' (SGGs) which set additional restrictions to development than the normal policy for the countryside and seeks to prevent settlements from merging, whilst protecting their separate identifies and settings. This includes 'Crewe/Shavington/Basford/Weston', which covers a large area which straddles the north and south of the A500 (Shavington bypass) between the settlements of Crewe and Shavington.

6.3 The IP document provides very little explanation on what the strategy or approach is likely to be in the new Local Plan with regards to the future extent or level of protection to be applied to the SGGs. The current purpose of the SGGs is reiterated in the Rural Matter Topic Paper (RMTP) published alongside the IP document, but provides very little additional information beyond the current policy position. The approach to Strategic Green Gaps (SGG) should be based on consideration of the structural features that contribute to the separation between settlements; and their setting. This consideration should be used to redefine the general extents of the current SGGs.

6.4 The questions put forward in the IP document do not refer to any updated evidence base that will be required to underpin the continued protection of these areas as SGGs. We note that evidence was considered at the recent Site Allocations DPD examination (*Strategic Green Gaps Boundary Definition Review 2020)* but this simply reviewed the detailed boundaries of the existing SGGs as defined in the Local Plan Strategy[16], rather than a reassessment of the principle of the SGGs themselves as this was not the purpose of that examination[17]. Similarly, the earlier *New Green Belt and Strategic Open Gap Study (2013)* did consider the general extent of the SGG, but this is now dated given it is over ten years old.

6.5 In the case of the SGG between Shavington and Crewe, the physical distance across the SGG is as little as approximately 280m. Furthermore, even the limited physical width of the designated SGG doesn't reflect the reality on the ground. Built development extends along Crewe Road north from the SGG boundary, as far as the junction with the slip road from the A500. Built development also extends south from the SGG boundary in the form of the Alexandra Soccer Centre. Built development extends intermittently along Rope Lane. The maximum distance between built

[16] Cheshire East Local Plan Strategy 2010-2030

[17] Cheshire East Council, Cheshire East Local Plan SADPD, Inspector's Report, 17 October 2022, para 134

development on Crewe Road is approximately 167m and between built development on Rope Lane, approximately 160m. Therefore, it is not the physical presence of built form along these routes that is the determining element of the SGG, but the perception of separation between the settlements provided by other features.

6.6 Based on Stantec's detailed review of the SGG between Shavington and Crewe, the structural elements in the landscape that are critical in maintaining the visual and perceptual gap between settlements and their setting include:

- the structural vegetation flanking both sides of the A500 dual carriageway;
- the A500 roadway itself;
- further blocks of structural vegetation; and
- extents of open land perceived around the northern fringes of Shavington and to the north of the A500 east of Rope Lane and west of Crewe Road.

6.7 It is this pattern of structural elements which contribute most significantly to the visual and perceived gap between settlements, as experienced from the key movement routes between the settlements. However, there is no published evidence providing such a detailed analytical assessment of the way in which the different structural elements of the landscape contribute to the function and purposes of the SGGs.

6.8 It was in the context of this lack of detailed and robust evidence setting out SGG extents and components, that three appeal Planning Inspectors allowed development within land then-designated as Green Gap at the northern edge of Shavington (Chestnut Avenue, appeal allowed in 2017; Needham's Grange, east of Crewe Road, appeal allowed in November 2016; Chatsworth Park, east of Rope Lane, appeal allowed in November 2012). These decisions took into account localised structural landscape features in determining that substantial areas of development within the Green Gaps would be acceptable on the basis that the visual and perceived gap would not be unduly harmed.

6.9 None of these decisions simply resort to consideration of the in-principle openness of the Green Gap as a critical factor preventing development within the Green Gap.

6.10 These decisions demonstrate the principle that, based on more detailed and holistic consideration of structural landscape elements at a site level, the physical gap can be reduced without compromising the visual and perceived gap and thereby, maintaining the purpose of the designation.

6.11 In the absence of such consideration, the extents of Strategic Green Gap (just as for the Green Gap which preceded it) are not founded on defensible principles which can only relate to the structure of the Gap rather than its openness in principle.

6.12 Neither the 2013 New Green Belt and Strategic Open Gap Study nor the 2020 Strategic Green Gaps Boundary Definition Review (SGGBDR) include any detailed analytical assessment of the

way in which the different structural elements of the land contribute to the function and purposes of the SGGs. The 2020 evidence base on boundaries of the SGG merely adjusted boundaries to follow the appeal Inspectors' decisions, rather than seeking to explore the reasoning behind these decisions to inform a more robust position on the boundaries of the SGG.

6.13 In terms of the new local plan, this calls into question the general extents of the SGGs. There was an opportunity to address this at the Examination of the Cheshire East Local Plan Site Allocations and Development Policies Document Green Gap Evidence Base. However, the Inspector's Report (2022), noted that the consideration of the general extent of the SGGs was not pertinent to the process of detailed boundary definition undertaken at that stage.

6.14 It is therefore clear that a fully-considered review of the purposes/function of the SGGs and, importantly, how they perform this function and therefore what land should be included within them is lacking and should be undertaken.

6.15 Furthermore, it is also noted that when the Local Plan Strategy was adopted, in 2017, it included a number of revisions to the SGGs that were adopted previously, which removed eleven separate land parcels and reallocated them for development, including residential. Notably, this included two such parcels of land to the south of the A500 bypass, both of which were detached from Crewe but located on the northern edge of Shavington settlement[18]. This clearly shows that certain sites located within the SGG were determined as being suitable at the time for alternative development-related uses.

6.16 In this context, we consider it important that the evidence base required to inform the general extent of the SGGs, including the Crewe/Shavington/Basford/Weston SGG, should be reviewed as part of the ongoing work to inform the new Local plan policy approach for the SGGs in the district. This is because we consider the SGGs to be overly restrictive and, if left unchanged, is likely to prevent the delivery of significant benefits to the local community from new development that would otherwise be constrained or precluded outright. Furthermore, the evidence for the continued protection of the SGGs should be reviewed to ensure that any new policy is suitably relevant and up to date and is adequate and proportionate, in accordance with national policy[19].

[18] Cheshire East Local Plan Strategy 2010-2030, Figure 8.3

[19] NPPF 2023, para 31