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

27 August 2026

Dear Sir/Madam,

CHESHIRE EAST LOCAL PLAN – SCOPING CONSULTATION

This representation is submitted on behalf of Seddon Homes in response to the Cheshire East Local Plan Scoping Consultation. It is not intended to promote or submit new development sites through this consultation. Rather, it seeks to ensure that the sites and supporting evidence submitted through the 2024 and 2026 Call for Sites exercises are positively assessed through the emerging Local Plan evidence base and site selection process.

Seddon Homes' commitment to delivering housing across the borough is demonstrated by the progression of planning applications on a number of promoted sites. This includes the full planning application at Land off Crewe Road, Winterley (ref. 25/4533/FUL), together with current planning proposals at Land off Gawsworth Road, Macclesfield (ref. 25/4841/FUL) and both Land East of Sydney Road (ref. 26/1230/FUL) and Land west of the A534/South of Bradeley Hall Road (ref. 25/3308/OUT) in Crewe promoted through the Call for Sites process. These submissions demonstrate that the promoted sites are not merely theoretical opportunities but are capable of contributing to housing delivery in the short to medium term.

Context for the new Local Plan

1. Increase in Housing Requirement

The significant increase observed in Cheshire East's housing need reinforces the requirement for a positive and pro-growth Local Plan. The standard method figure of 2,530 dwellings per annum represents a 41% increase against the current Local Plan requirement (1,800 dpa).

Policies HO1 and HO2 of the August 2026 NPPF outlines that Councils should use the standard method figure as a starting point when deciding how many new homes to plan for in a local plan. However, the final housing requirement figure identified in the new local plan should be higher to reinforce the future housing trajectory if delays are experienced.

The Council's recognition that it cannot currently demonstrate a robust five-year housing land supply is also consistent with National Policy. The latest published monitoring position identifies

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only a 3.3 year supply of deliverable housing sites, demonstrating the urgency of identifying additional land capable to housing delivery, and ensuring these can be delivered in short timescales.

The sites submitted on behalf of Seddon Homes during the 2024 Call for Sites and 2026 Call for Sites process can make an important contribution towards meeting the increased housing requirement and restoring a robust housing land supply. Their allocation would accord with the August 2026 NPPF by supporting a positive strategy which meets development needs and providing a sufficient supply of housing land across a diverse portfolio of sites with a range of locations, sizes and delivery timescales.

2. *Changes to the Green Belt Policy*

The August 2026 NPPF was published following the publishing of the Scoping Consultation, and a number of Green Belt policy changes should be reflected in the Local Plan. Policies GB2 and GB3 require the Council to undertake a borough-wide assessment of Green Belt land, clearly identifying grey belt land using the methodology outlined in Annex E, considering where boundaries should be altered to meet development needs. The final definition of grey belt has been simplified, removing the previous requirement to consider whether other national constraints provide a strong reason for refusal.

Given the outlined increase to Cheshire East's housing requirement and current land supply shortfall, the assessment should positively identify sustainable opportunities for growth rather than treat the existing Green Belt boundaries as fixed. Priority should be given to suitable grey belt sites, however other Green Belt sites should remain capable of release whereby they are fully evidenced by exceptional circumstances.

3. *Spatial Development Strategy*

The Spatial Development Strategy for Cheshire East and Warrington should provide a high-level framework for long-term growth, strategic infrastructure and the broad distribution of development whilst detailed site selection and allocation remain a matter for the Cheshire East Local Plan.

The preparation of the SDS should not delay the Local Plan process, nor delay any decisions needed to meet Cheshire East's immediate housing requirement and current land supply shortfall. Therefore, the Council should continue progressing its Local Plan evidence base and positively assess the sites submitted through the Call for Sites process.

The emerging SDS should support, rather than restrict a pro-growth Local Plan which meets housing needs in full and identifies a diverse portfolio of deliverable sites, including those submitted by Seddon Homes.

4. *Supplementary Planning Documents*

The review of existing Supplementary Planning Documents is supported. Their replacement provides the Council with an opportunity to create a clear and more streamlined policy framework with specific local requirements.

Future Supplementary Planning Documents should add practical detail without duplicating policies or introducing new requirements that are already addressed within the Local Plan. The Council should also outline clear transitional arrangements to ensure that developers understand which guidance remains applicable while the new Local Plan is being prepared.

Local Plan Scope

5. Plan Period

The proposed plan period to March 2045 is supported. Policy PM2(1)(b) of the August 2026 NPPF requires Local Plans to cover a period of at least 10 years from adoption. The proposed plan period comfortably exceeds this minimum requirement and will provide a sufficient certainty for the identification, allocation and delivery of strategic development opportunities.

Given that the adopted Cheshire East Local Plan was adopted in 2017, the new Plan should ensure that the current housing land supply shortfall and unmet needs are addressed through a positive strategy which identifies sufficient deliverable sites from the outset of the plan period.

6. Creating a Vision and Objectives

Seddon Homes supports the preparation of a concise and locally distinctive vision for Cheshire East, accompanied by clear objectives and no more than 10 measurable outcomes.

The vision should be positively framed around growth, recognising that the delivery of new homes is essential to Cheshire East's future prosperity. It should commit to meeting identified housing need in full through a sustainable spatial strategy and the allocation of a diverse portfolio of suitable, available and achievable sites across a range of settlements, sizes and timescales.

The objectives and outcomes should prioritise housing delivery, affordable housing and the maintenance of a robust supply of deliverable land. They should also recognise the contribution of a wide range of housebuilders that can build sites of various sizes to avoid the over-reliance on a limited number of large strategic allocations. This would promote greater choice and reliability within the housing land supply and support delivery throughout the plan period.

7. Planning for Growth

Seddon Homes supports the Council's commitment to sustainable growth and the delivery of much needed homes across the Borough. The new Local Plan should adopt a positive pro-growth strategy which seeks to meet Cheshire East's identified housing needs in full and identifies a sufficient number of sites to maintain delivery throughout the plan period. This accords with Policy S1 of the August 2026 NPPF, which requires plans to take a positive approach to growth and seek to meet identified development needs as a minimum.

8. *Identifying and assessing sites*

Seddon Homes supports the identification of a broad range of potential development sites to provide a genuine choice and to ensure that Cheshire East's housing needs can be met in full. The proposed land availability assessment should be positive, transparent and proportionate to assess sites consistently on their suitability, availability and achievability including the likely delivery timescales in accord with Policy PM9 of the August 2026 NPPF.

The assessment should give appropriate weight to deliverability, including where land is controlled by an active housebuilder that has proactively engaged with the Council and can deliver housing imminently. It should also recognise the benefits of maintaining a diverse portfolio of sites across different locations rather than relying on a disproportionate number of large strategic allocations.

Whilst Seddon Homes appreciates the Council's ambitions to utilise Brownfield Development, we believe the Council will have to identify housing options within the Green Belt to sufficiently address the housing shortfall.

Seddon Homes has submitted a portfolio of sites through the Call for Sites process that can support housing delivery across Cheshire East. The submissions include a wide range of land that is available to an identified housebuilder, capable of making an early contribution to the housing supply. The Council should therefore assess each promoted site positively and on its individual merits, taking account of the evidence submitted and allowing promoters an opportunity to provide updated or additional technical information before any site is excluded from further consideration.

9. *Green Belt*

Seddon Homes supports a borough-wide Green Belt assessment but considers that the Council's approach should be more positively framed. The August 2026 NPPF requires Green Belt authorities to assess existing Green Belt land and identify possible grey belt sites as part of the Local Plan evidence base. The assessment should therefore do more than just inform whether Green Belt release may be necessary. It instead should actively identify sustainable opportunities capable of contributing towards meeting Cheshire East's development needs.

The sequential approach should not be applied as an absolute requirement to exhaust every potential brownfield or non-Green Belt opportunity before suitable grey belt or other sustainable Green Belt sites are considered. The availability of land outside of the Green Belt does not, by itself, demonstrate that it is suitable, achievable or capable of meeting needs within the required timescales. Any assessment should also consider the realistic capacity and infrastructure requirements of alternative sites.

The Green Belt assessment should be transparent and consistent with the methodology as outlined within Annex E of the NPPF, and undertaken at an appropriate granular level, assessing specific sites. Sites should not be excluded solely because they are currently designated Green Belt or considered against assumptions from previous assessments. Whilst the sites promoted on behalf of Seddon Homes are not dependent upon Green Belt release, the Council's assessment should remain sufficiently flexible to identify suitable Green Belt and grey belt opportunities where these are required to meet development needs.

10. Strategic Green Gap

Seddon Homes is promoting two related sites in Crewe, Land east of Sydney Road and the wider Land west of the A534/south of Bradeley Hall Road. The sites are adjacent to the existing settlement boundary and form a logical extension to Crewe, with established residential development to the south and west, and the A534 providing a strong, permanent physical boundary to the east.

Appropriate structural landscaping, green infrastructure and landscape buffers have been incorporated within the development proposals to maintain visual separation between settlements and ensure the wider function of the Strategic Green Gap is retained.

The submitted evidence clearly demonstrates that the proposed residential development would not cause coalescence between Crewe and Haslington and would retain openness and settlement identity without materially compromising the function of the Strategic Green Gap. The Council should therefore take a proportionate and site-specific approach, recognising that not all land within the designation performs the same function.

11. Settlement Hierarchy

Seddon Homes supports a review of the settlement hierarchy. The hierarchy should be based on up-to-date evidence and should prevent suitable sites from being allocated where they are well related to the settlements and capable of supporting their services and facilities.

The spatial strategy should direct substantial growth to the Principal Towns and Key Service Centres including Crewe, Macclesfield, Congleton, Middlewich and Nantwich, whilst retaining flexibility to support a proportionate growth at smaller sustainable settlements.

The hierarchy should also recognise the importance of sustainable travel patterns, including the proximity to rail stations and key employment locations. Settlements which provide good connectivity to employment opportunities and public transport infrastructure should be capable of accommodating an appropriate proportion of future growth. This is particularly relevant given the increased emphasis within the August 2026 NPPF (Policy S5 (h)) on sustainable locations and development that supports access to employment, services and public transport.

A positive and flexible hierarchy will enable the Local Plan to allocate a diverse portfolio of deliverable sites across the borough, including the sites submitted by Seddon Homes, to meet the Borough's housing needs in full.

12. Spatial Distribution

Seddon Homes supports the consideration of a broad range of spatial options, including sustainable edge-of-settlement development and urban extensions. The preferred strategy should be pro-growth and flexible to meet the identified housing needs in full, rather than treating existing boundaries as fixed constraints.

Development should be distributed having regard to housing demand, affordability, accessibility, and infrastructure deliverability, with environmental constraints assessed proportionately at site level.

Housing

13. Affordable Housing

Seddon Homes supports the delivery of affordable housing as an integral part of sustainable residential development. However, the Local Plan's requirements should be informed by robust evidence of need and viability, recognising the geographical differences in the housing markets and development costs across Cheshire East, whilst being able to react to the changing housing market over the plan period.

14. Housing Mix

The proposed review of housing mix policies is supported, provided that any requirements are informed by up-to-date evidence and applied flexibility to reflect local demand, site characteristics, viability and market conditions. Overly prescriptive requirements could restrict the ability of housebuilders to respond to changing needs and potentially undermine delivery.

The Local Plan should therefore establish the broad housing outcomes sought, whilst allowing the detailed mix of dwelling types, sizes and tenures to be determined through individual planning applications. This would support the delivery of balanced and sustainable communities while ensuring that development remains responsive and deliverable.

15. Housing for Older People

The preparation of evidence on housing needs of older people and those requiring specialist accommodation is supported. Any identified need should be addressed through a flexible approach, recognising that accessible and adaptable general market housing can contribute alongside specialist provision.

Requirements of particular forms of accommodation, accessibility standards should be justified by robust evidence that is tested for viability and deliverability. The policy should allow the appropriate form and scale of provision to respond to local circumstances and site characteristics rather than imposing a uniform requirement across all residential developments. Sites should be identified for specialist housing prior to allocation, enabling chosen developers to ensure consistent delivery, rather than forcing certain housebuilders which may delay delivery. This will support a broader choice of homes whilst ensuring that the requirements do not unnecessarily constrain housing delivery.

16. Gypsy Travellers and Travelling Showpeople

The proposed preparation of an updated Gypsy and Traveller Accommodation Needs Assessment (GTANA) and identification of sufficient sites to meet the evidenced need is supported. The Local Plan should provide a clear and deliverable supply of pitches and plots in appropriate locations, based on robust evidence and realistic assumptions regarding availability and deliverability.

Where provision is considered as part of a larger mixed-use development, this should be determined on a site-specific basis and supported by evidence of suitability, need and viability rather than imposed as a standard requirement on residential allocations.

17. Self-Build and Custom-Build Housing

The continued provision of self-build and custom-build housing is supported as a means of diversifying the housing market and increasing customer choice. However, the Local Plan should not identify specific sites for self/custom-build housing but instead create a policy which allows plots to come forward in a positive fashion where demand facilitates.

18. Housing Diversification and Provision of Small and Medium Sized Sites

We support the emphasis on the diversifying the housing market and allocating a greater number of small and medium sized sites across the borough. Particularly given the minimum housing need of 2,530 dwellings per annum, equivalent to 37,950 homes over a 15-year plan period.

The land availability assessment should positively identify a broad portfolio of smaller, deliverable sites, including edge of settlement opportunities, recognising their contribution to housing choice and distance to local services.

Seddon Homes own a wide range of sites, which are capable of making an early contribution to the housing supply. For example, land off Crewe Road, Winterley is identified as capable of a single-phase delivery within five years, while Land off Gawsworth Road, Macclesfield is also promoted as a short-term opportunity.

Allocating such sites alongside larger strategic developments would reduce reliance on a limited number of complex allocations and support a more flexible and deliverable housing trajectory.

19. Housing Standards

Seddon Homes support the principle of delivering accessible, water-efficient and appropriately sized homes. However, any requirements for M4(2), M4(3), water efficient and NDSS should be clearly justified by proportionate evidence and tested collectively through the Local Plan viability assessment.

Standards should be applied flexibly to reflect the site characteristics, technical feasibility and identified local need, particularly for wheelchair accessible housing. It is important that the Council does not duplicate matters controlled through the National Policy or Building Regulations or impose cumulative requirements that could undermine housing viability or deliverability.

The August 2026 NPPF establishes a national minimum expectation of 40% accessible homes on major developments.

20. Transport and Infrastructure

The proposed vision-led approach to transport and infrastructure planning is supported. The Local Plan should identify the infrastructure necessary to enable planned growth, with transport and utilities considered alongside the spatial strategy and site allocations process.

Existing infrastructure constraints should not be treated as an automatic barrier to otherwise sustainable development, where proportionate mitigation, investment or a phased provision can address the identified impacts.

Importantly, infrastructure requirements and developer contributions should be evidenced-based, directly related to the development and tested cumulatively through the Local Plan viability assessment to ensure they do not prejudice housing developer.

21. Natural Environment

We believe that environmental evidence should inform the site selection process, without treating the presence of any ecological, landscape, or green infrastructure considerations as an automatic barrier or constraint to development, where impacts can be avoided or mitigated.

Any requirement for biodiversity net gain (BNG) above the national minimum of 10% should be supported by clear local evidence and viability testing, with sufficient flexibility for gains to be delivered onsite or offsite as deemed appropriate to not undermine the viability or delivery of housing sites.

22. Health and Wellbeing

Seddon Homes agree that the Local Plan should promote healthy and inclusive communities by delivering good-quality housing developments with accessible green spaces, active travel connections and community infrastructure.

The Council should develop a detailed evidence base on the infrastructure needs of each settlement with associated costs, phasing and funding. Health-related policies and infrastructure requirements should be proportionate and evidence based, alongside other obligations to ensure they do not undermine development viability or housing delivery.

New residential development should be recognised as having an important role in improving health outcomes by increasing access to suitable homes and supporting existing services and facilities.

23. Public Safety

Seddon Homes agree that creating safe and secure places is essential to sustainable communities. New development should incorporate appropriate design measures that provide natural surveillance, safer walking routes and well-designed public spaces. Any policy requirements should remain proportionate to the scale and nature of development and avoid duplicating matters addressed through national policy or other regulatory regimes.

24. Health Inequalities

Seddon Homes agree that the Local Plan has the opportunity to reduce health inequalities across the Borough by supporting the delivery of high-quality housing with accessible green spaces, sustainable travel links and appropriate community facilities. New housing should be recognised as an important contributor to healthier and more inclusive communities. Any local standards or new Local Green Space designations should be justified by proportionate evidence and should not unnecessarily constrain sustainable development or housing development.

25. Active Travel

The promotion of active travel measures is supported. As outlined, new development proposals should provide safe and convenient walking and cycling connections, with the requirements being proportionate to the scale, location and accessibility of each site. Existing network deficiencies should not prevent sustainable development where appropriate improvements or mitigation can be delivered.

26. Climate Change

Seddon Homes support the Council's ambitions to address climate change, and itsaim to become carbon neutral by 2045. Seddon Homes agree that the Local Plan will need to promote resilience through its strategic approach to growth distribution and building design, including the allocation of well-located housing sites that are energy efficient and include sustainable drainage and green infrastructure.

Any local requirements relation to energy/water or carbon efficiency should be supported by robust evidence and tested for technical feasibility, viability and deliverability. Additionally, they should avoid duplicating or conflicting with the Building Regulations and retain sufficient flexibility to respond to different site characteristics and changes in national standards over the plan period.

Measures to improve climate resilience should be integrated from the outset of development without creating a disproportionate barrier to housing delivery. The reuse of existing buildings may be appropriate in some circumstances such as town centre regeneration or previously developed urban sites, but this should not constrain the efficient use or redevelopment of land where development represents the most suitable and viable approach.

27. Heritage (Conservation Areas/Jodrell Bank)

Cheshire East has a diverse range of heritage features, and conserving and enhancing the historic environment is an important consideration. However, Seddon Homes believe that heritage considerations should be assessed proportionately and on a site-specific basis, having regard to the proximity and significance of the relevant heritage asset, and to the extent to which its setting contributes to that significance.

The presence of a nearby designated or non-designated heritage asset, conservation area or site of archaeological interest should not automatically preclude development where impacts can be avoided or appropriately mitigated through layout, design or landscaping measures.

Similarly, any policies related to the Jodrell Bank should be based on clear evidence of the potential effects on its outstanding universal value or operational function, rather than applying a blanket restriction across its wider setting. This would ensure that important heritage assets are properly conserved whilst allowing sustainable and sensitively designed growth to come forward.

28. Design

Seddon Homes agree that creating well-designed and sustainable places is central to the planning system, as demonstrated through national policy and emphasis on sustainable development. The Local Plan should therefore include a clear and strategic design framework whilst avoiding unnecessary duplication of national policy and guidance.

Design codes should be proportionate to the scale and complexity of developments, particularly focused on strategic sites providing flexibility to respond to changing circumstances and detailed design works.

The need to respect local character should be balanced against the efficient use of land and the delivery of sufficient homes. Local character should inform development design, rather than prevent appropriate growth or require replication of existing built form. Area or site-specific design codes should therefore be prepared collaboratively, informed by evidence and tested to ensure that the requirements are practical and viable.

29. Local Plan Evidence Base

Seddon Homes support the Council's commitment to prepare a robust evidence base for the emerging Local Plan, provided it remains up to date and proportionate, focused on the matters necessary to justify the Local Plan's strategy and housing allocations.

Given the scale of Cheshire East's housing requirement and current shortfall, the evidence should positively identify opportunities for growth assessing identified constraints against the identified need ensuring that they don't act as a barrier to development.

Particular importance should be placed on the Sustainability Appraisal, land availability assessment, settlement hierarchy review, spatial distribution assessment, strategic green gap review, infrastructure and viability evidence, as these will directly influence the assessment of sites promoted through the Local Plan.

The Sustainability Appraisal should include a comprehensive assessment of reasonable growth options and spatial alternatives, ensuring that sustainable development opportunities are fully considered before being discounted.

Site assessment methodologies and assumptions should be transparent and applied consistently throughout, but remain open to scrutiny. Promoters should be given an opportunity to submit further evidence or address any identified constraints prior to sites are excluded.

Seddon Homes have submitted a portfolio of sites forward in the 2024 Call for Sites, and again in the 2026 Call for Sites process. These sites have detailed technical evidence and reports available to the Council. This information should be appropriately considered as part of the site assessment process.

30. Key Issues

The scale and urgency of the housing challenges faced by Cheshire East should be clearly reflected in the new Local Plan. The Council is currently unable to demonstrate a five-year supply

of deliverable housing sites, whilst the minimum housing need has increased to approximately 2,530 homes per annum. This will require a positive, pro-growth strategy that identifies a sufficient, available and deliverable quantity of land to meet the housing needs in full to restore the robust housing land supply.

The accelerated 30-month plan-making timetable should not result in potentially sustainable sites being discounted at a premature stage. The Call for Sites submissions should be assessed transparently and proportionately with promoters given the opportunity to address any identified constraints and provide updated technical evidence. Likewise, the review of the Green Belt/Grey Belt should form part of this positive assessment rather than predetermining the distribution of housing growth.

The sites submitted on behalf of Seddon Homes provides a diverse portfolio of sites across a range of settlements, sizes and delivery timescales. Their allocation would support an early housing delivery and provide less reliance on a limited number of complex strategic sites that will inevitably delay the housing delivery.

31. Engagement

We support the transparent and proportionate approach to engagement proposed throughout each stage. However, engagement with site promoters should not be limited to solely for procedural matters of following published feedback.

Meaningful dialogue should take place before any decisions are made to exclude sites, enabling promotors the opportunity to clarify their submissions and provide updated technical evidence to demonstrate how the identified constraints could be mitigated.

This will be particularly important under the accelerated Gateway process where opportunities to resolve site-specific matters may be limited. Equal treatment does not preclude constructive engagement from the Council on individual sites where this supports a robust site selection and result in better planning outcomes.

The Council should therefore provide a clear assessment criteria, publish their findings promptly and ensure that the sites submitted by Seddon Homes in the Call for Sites process are fully assessed before the draft Local Plan is published.

Yours faithfully

Owen Hughes
Assistant Planner