Spawforths
planners architects

Cheshire East Local Plan - Scoping

Scoping Consultation Representation

Cheshire Fresh Ltd | Revision A | August 2026

1 Introduction

1.1 Cheshire East Council ("the Council") is preparing a new Local Plan to respond to updated national legislation, policy and guidance relating to plan-making and sustainable development. The Council is undertaking this Scoping Consultation in accordance with Regulation 20 of the Town and Country Planning (Local Planning) (England) Regulations 2026, with the purpose of engaging key stakeholders, landowners, developers, infrastructure providers and local communities at an early stage in the preparation of the emerging Local Plan.

1.2 Spawforths has been instructed by Cheshire Fresh Ltd ("Cheshire Fresh") to submit representations on the Cheshire East Local Plan Scoping Consultation.

1.3 Cheshire Fresh welcomes the opportunity to contribute positively to the preparation of the emerging Local Plan and supports the Council's intention to establish an ambitious and deliverable strategy for sustainable growth across the Borough over the plan period.

1.4 Cheshire Fresh has development interests within Cheshire East located to the north west of Crewe. Cheshire Fresh is well placed to support the delivery of the District's growth and regeneration ambitions through the promotion of sustainable development in accessible locations.

1.5 Cheshire Fresh would like to make comments on the following topics and sections of the Cheshire East Local Plan Scoping Consultation:

- Baseline information and spatial portrait
- Plan Period
- Vision and objectives
- Planning for growth – identifying and assessing sites, housing and employment sites.
- Strategic Green Gaps
- Settlement Hierarchy
- Spatial Distribution
- Development in the Countryside
- Housing – Including policy coverage relating to mix, type and tenure
- Employment and Economy
- Health and Well Being
- Recreation
- Local Plan Evidence

1.6 Cheshire Fresh welcomes continued engagement with the Council throughout the preparation of the emerging Local Plan and reserves the right to participate at future consultation stages, including Examination in Public.

1.7 It is respectfully requested that these representations are considered as part of the preparation of the emerging Local Plan and associated evidence base.

1.8 Please do not hesitate to contact us to discuss any issues raised in this Representation further.

2 National Planning Policy Context and Tests of Soundness

2.1 The Government reiterates within the 2026 Framework that the purpose of the planning system is "*to contribute to the achievement of sustainable development, by managing the use and development of land in the long term public interest*"[1]. Plans are required "to meet the development needs of their area as a minimum"[2]. This includes the need to provide for objectively assessed needs for housing, business and other uses, alongside any needs that cannot be met within the neighbouring area[3]. The Framework seeks to ensure that a sufficient amount and variety of land can come forward where it is needed.

2.2 The 2026 Framework sets out to deliver a "*substantial increase in the supply of homes*" and ensure that a sufficient amount and variety of land can come forward where it is needed[4]. The Local Housing Need identified through the standard method in Annex D of the 2026 Framework should be met as a minimum. In terms of building a strong and competitive economy Section 7 and Policy E1 of the 2026 Framework states that planning should provide the conditions for long term economic growth, enabling businesses to invest, expand and adapt in a way that reflects the opportunities, challenges and characteristics of the area. The key focus throughout the 2026 Framework is to create the conditions for sustainable economic growth and deliver a wide choice of high-quality homes and well-designed places.

2.3 In relation to Plan making Chapter 2 of the 2026 Framework provides policies to support the creation of a planning system that is "genuinely plan-led". Policy PM1 and PM2 requires Spatial Development Strategies and Local Plans to establish a positive vision for the Plan area. Policy PM 1 requires spatial development strategies to establish a strategy to deliver a sustainable pattern of growth over a period of at least 25 years. Policy PM 1 requires Local Plans to establish a spatial strategy, for a period of no less than 10 years, and supports the use of a longer period where this would support the delivery of longer term infrastructure or strategic development. The 2026 Framework is a material consideration of "critical importance" for Plan making and Plans are expected to respond positively to the Policies within the 2026 Framework. Plans must be consistent with the Framework and should set out the opportunities for development and provide clear policies on what will and will not be permitted and where.

[1] Paragraph 15, NPPF, August 2026
[2] Policy S1, 1a., NPPF, August 2026
[3] ibid
[4] Chapter 6, NPPF August 2026

2.4 Policy PM 14 identifies the tests that should be satisfied by a sound spatial strategy. In relation to the examination of Local Plans, Policy PM 15 of the 2026 Framework sets out the tests of soundness and establishes that:

Local plans and minerals and waste plans are subject to an independent examination by an inspector (or panel of inspectors) appointed by the Secretary of State. The purpose of the examination is to assess whether the plan is 'sound'. A sound plan should satisfy the following tests:

- **Positive –** the plan sets out a positive approach to delivering growth to meet the development needs of the area in accordance with policy S1, and is based on effective joint working on cross-boundary strategic matters;
- ***Appropriate –*** *the plan sets out an appropriate strategy to enable the delivery of sustainable development, taking into account reasonable alternatives, and is based on proportionate evidence;*
- ***Effective –*** *the plan sets out effective policies for development, and there is a reasonable prospect that its site allocations are capable of being deliverable at the time envisioned;*
- ***Consistent with national policy*** *– the plan accords with the policies for plan-making in this Framework and other statements of national planning policy where relevant, and does not include policies which duplicate, substantively restate or are inconsistent with the content of national policies for decision-making; and*
- ***Conformity*** *– the plan is in general conformity with any adopted spatial development strategy for the area.*

2.5 The Local Planning Authority must demonstrate that the Local Plan Update complies with the legal and regulatory Framework, including the legal requirements in ss19 and 24(1) of the Planning and Compulsory Purchase Act 2004 (PCPA 2004), Regulations under s.17 and any regulations under s. 36 relating to the preparation of DPD's, and that the Local Plan Update is 'Sound'.

2.6 The PCPA 2004 requires the LPA to demonstrate that regard has been given to national policies and advice, development plan documents, and must undertake a sustainability appraisal. Plan making authorities are also required to have regard to the resources that are likely to be available for implementing the proposals[5]. As confirmed with legal judgements "resources" includes resources in the private sector "*thus the viability and deliverability of the proposals are considerations to which the authority should have regard when preparing its policies."*[6]

[5] PCPA Section 19 (2)(i)

[6] West Berkshire District Council and Reading Borough Council v. DCLG, 2015 EWHC 2222 (Admin)

3 Scoping Consultation Questions.

General Comments

3.1 Cheshire Fresh's response to the relevant scoping questions is identified below, as set out within this response, Cheshire Fresh welcomes the opportunity to engage with the Council on the preparation of the Local Plan, and will welcome opportunities for further engagement, including relating to the development of key evidence base and site selection methodology. The comments below are made in the context of the National Planning Policy Framework, August 2026 referred to hereafter as the "2026 Framework".

3.2 Cheshire Fresh reiterate that Policy PM6 General Principles for plan-making is clear that in preparing plans plan makers should "*not include policies which duplicate, substantially restate or are inconsistent with the content of national decision-making policies".* This principle is enshrined within the revised tests of soundness contained within Policy PM14.

3.3 Consequently, the scope of the Plan should have regard to the need not to repeat the content of the national decision making policies contained within the 2026 Framework.

Context for the new Local Plan

3.4 The sub section relating to the increase in housing requirements, Paragraph 3.5 states that Cheshire East's Local Housing Need Figure is 2,530 dwellings per annum. The LHN figure for Cheshire East in May 2026 was 2531 dpa. Cheshire Fresh does not consider that it is appropriate to round down the housing requirement in the context of the 2026 Framework which seeks to substantially increase the supply of homes.

3.5 Cheshire East considers that in order to be considered sound the strategy should meet the areas objectively assessed needs as a minimum (Policy S1 and Policy HO2 -3). Policy HO1 and HO2 is clear that in the absence of a spatial strategy that Local Plans should be based on a housing need assessment that establishes the overall number of homes needed in the area as a minimum and should establish requisite housing requirement figure.

Baseline Information and Spatial Portrait

3.6 Policy PM8, of the 2026 Framework requires plans to be "informed by a baseline understanding of the needs, opportunities, constraints and wider context of the area to which they relate." Cheshire Fresh is concerned that the baseline as presented within the scoping is not sufficiently comprehensive to establish a full picture of the Plan area's opportunities, constraints or needs. Limited wider context has been

provided within the current baseline, guidance[7] is clear that there should be a review of wider priorities and strategies. It is clear that the baselining stage should include analysis both of the current picture and potential future picture. The use of maps, as encouraged through guidance[8] would serve to improve the spatial context and could provide better insight into the opportunities and constraints of individual settlements, essential to develop the Local Plan. The baseline is also missing a 'critical analysis' necessary to develop the emerging plan and supporting engagement with stakeholders.

3.7 The baseline should address the supply of housing, and scale of future needs, employment supply and needs, and any challenges relating to infrastructure.

3.8 Cheshire Fresh however welcomes the recognition at paragraph 4.2 that parts of the borough are influenced by adjacent cities, and that paragraph 4.5 acknowledges the Plan areas strong transport connections, including the M6 Motorway, M56 Motorway and highlights that Crewe is a national rail hub. Cheshire Fresh also welcomes the recognition of Crewe's skill base, noting its manufacturing base, and rail and engineering heritage.

3.9 However, the baseline fails to clearly set out the clear strengths and opportunities of key settlements such as Crewe, with its strategic connectivity, to meet identified needs and deliver growth, as well as responding to challenges such as deprivation and skills, that were indicated in paragraph 4.9.

3.10 Cheshire Fresh consider that there are significant opportunities for growth within and around Crewe associated with the settlements excellent connectivity with major economic centres within the wider region and country as a whole, access to a skilled workforce, strong advanced manufacturing base, an IS-8 Sector within the Modern Industrial Strategy, the presence of Crewe Engineering and Design University Technical College, and relatively affordable land values. Delivery of growth and supporting investment within Crewe will support the delivery of a range of social and economic benefits and contribute to responding to the challenges associated with higher levels of deprivation.

3.11 The opportunities within Crewe should be positively responded to within the Plan, its vision objectives and policies.

3.12 **Cheshire Fresh consider that consistent with guidance the baseline requires further development, and critical analysis in order to present a clear and spatial picture of the Plan Areas needs (including housing, employment, infrastructure), opportunities and constraints. The baseline should include a review of the wider context within which Cheshire East is located, this should include a review of the wider national, regional and sub regional strategies**

[7] Gathering baseline information to inform a local plan. Gathering baselining information to inform a local plan - GOV.UK
[8] ibid

and priorities. The baseline should recognise the locational advantages within Crewe, and the significant opportunities for growth, which will delivery social and economic benefits, and respond positively to the regeneration needs of the area.

Plan Period

3.13 The Scoping document states that the Local Plan will have a plan period of 2029 to 2054. Assuming adoption of the Local Plan in 2029, the Plan would have a 16 year plan period. Whilst this is above the minimum requirements identified in Policy PM2, Policy PM2(1)(b) is clear that Local Plans can cover a longer period where this would help support the delivery of strategic sites. The Scoping Document (paragraph 5.26) recognises that "given the scale of development, that is likely to be required, the new plan may need to consider a range of options in the distribution of development, potentially including opportunities for densification, and further development within existing settlements, edge of settlement growth, large scale urban extensions and new settlement". Strategic sites and infrastructure delivery have a long lead in period. A longer plan period would provide greater certainty for major urban extensions and new settlements. Accordingly, it is considered appropriate to extend the Plan period in order to appropriately plan for and support the delivery of the anticipated strategic scale development, and necessary infrastructure within the Plan Area.

3.14 Furthermore, where Spatial Development Strategies exist such plans would provide a longer term strategy for growth of at least 25 years. At present there is no Spatial Development Strategy covering the Plan area. This creates uncertainty over the long term ambitions for the area. In the absence of the Spatial Development Strategy, the Local Plan should therefore play a greater role in establishing a longer term positive strategy for development within the Plan area. This will serve to manage the transition to the Spatial Development Strategy.

3.15 **Cheshire Fresh consider that the Plan Period should be extended to cover a period of at least 25 years**.

Vision, Objectives and Measurable Outcomes

3.16 Consistent with guidance the Vision should be ambitious, but grounded in reality[9], where an SDS is in place the vision would be expected to be consistent, and reflect the strategic and spatial priorities within the SDS. In the absence of an SDS, it is essential that the vision does not shy away from addressing wider strategic priorities. The vision has regard to wider regional and sub-regional priorities, and emerging evidence to support the future preparation of an SDS. Guidance[10] also states that the vision should not only address what can be achieved within the plan period, but

[9] Preparing a Local Plan Vision, Preparing a local plan vision - GOV.UK
[10] ibid

also address the longer term expectations, including for example larger scale development proposals that will be delivered over the longer term. This is necessary in Cheshire East as the Council has indicated that future growth options could include larger urban extensions and new settlements.

3.17 Consistent with the 2026 Framework Cheshire Fresh consider that the Local Plan should establish a positive approach to housing and establish a clear economic vision which takes a positive approach to encouraging sustainable economic growth.

3.18 In order to be consistent with the 2026 Framework the Vision should seek to meet the development needs as a minimum. This will require the Council to explore whether there is a need for an uplift to the LHN. The 2026 Framework is clear that housing requirement figures should "*be higher than the overall figure identified in the local housing need assessment where appropriate. This includes where a higher housing requirement is necessary to meet the needs of neighbouring areas or reflect growth ambitions linked to economic development or infrastructure investment".*

3.19 Critically the vision should have a spatial dimension and be locally distinctive. Cheshire Fresh therefore consider that the vision should recognise Cheshire Easts connectivity to the Strategic Road Network, with connections with the M6 Motorway and M56 Motorway. It should address Crewe's strategic connectivity to the rail network, its regeneration needs and its growth potential. In doing so it should establish a clear ambition to deliver growth within Crewe.

3.20 The Land at Weavers Green, is on the north western site of Crewe and is capable of making a significant contribution towards meeting the development needs of the Plan area.

3.21 The Outcomes should be clearly related to the Plans vision and support monitoring and future reviews. The 2026 Framework establishes a clear objective to substantially increase the supply of homes, and there is a significant housing need within Cheshire East. It is essential that one of the 10 outcomes relates to housing delivery not only the quantum of homes delivered but the location, size, type and tenure.

3.22 As set out above Cheshire Fresh also expect the plan to take an ambitious approach to delivering sustainable economic growth and accordingly at least one of the outcomes should support the monitoring of delivery against Plan targets for the economic growth. This is in line with guidance[11] which recommends the of quantitative and qualitative targets and standards.

3.23 The vision should be ambitious, realistic, and address what can be achieved within the plan period, but also address the longer term expectations, it should present a positive vision of sustainable economic and housing growth aligned with the 2026 Framework. Cheshire Fresh consider that the vision should have a spatial dimension

[11] Preparing a local plan vision, Preparing a local plan vision - GOV.UK

and be locally distinctive. In doing so the vision should recognise Cheshire East's connectivity to the Strategic Road Network, with connections with the M6 Motorway and M56 Motorway. It should address Crewe's strategic connectivity to the rail network, its regeneration needs and its growth potential.

3.24 The Outcomes should be clearly related to the Plans vision and support monitoring and future reviews and at least one outcome should relate to housing needs, supply and delivery, and at least one outcome should address employment needs and delivery.

Planning for growth

3.25 In relation to paragraphs 5.5- 5.6 Cheshire Fresh reiterate that Policy PM2 requires Local Plans set out a positive strategy and to accommodate development needs. Policy S1 is clear that Plans should "plan positively for future growth and change" and should seek "to meet the development needs of their area, as a minimum". With respect to housing Policy HO2 requires housing requirement figures to reflect the extent to which identified needs can be accommodated as a minimum and be higher than the figure derived from the local housing needs assessment, where appropriate. This includes where there is unmet need from neighbouring areas or to reflect the growth ambitions linked to economic development or infrastructure investment. It is critical that the plan is informed through an evidence base which has sought to establish the development needs of the area, understand cross boundary matters, investment plans, and economic strategies and industrial strategies.

Identifying and assessing sites, housing and employment sites

3.26 Cheshire Fresh supports the Council's need to prepare a Strategic Housing and Employment Land Availability Assessment (SHELAA), to support the assessment of sites, filtering out sites that are unsuitable and the assessment of suitability, availability and achievability. It is important that landowners, promoters, agents and developers are involved in the preparation of the SHELAA, its methodology, and key assumptions. Any assumptions used should be clearly evidenced. Cheshire Fresh welcomes further opportunities to engage in the development of the updated SHELAA.

3.27 Cheshire Fresh has submitted land at Red Hall Farm to the Call the Sites, identified by the Council as Land West of Middlewich Hall. The submitted vision confirms that the site is available, suitable and achievable, and therefore deliverable. A planning application has been submitted, this will support early delivery of the site, enabling the site to make a meaningful contribution towards to supply of land.

Strategic Green Gaps

3.28 Cheshire Fresh considers that the Council's approach should accord with national policy and guidance and does not in principle support the identification of strategic

gaps as an additional planning constraint. The 2026 Framework does not prohibit local authorities from identifying 'Strategic Gaps', Policy S2 (C) is clear that "*Designations and associated policies to safeguard gaps between settlements should only be used where they are necessary to maintain the separate identities of the settlements and their physical separation, should be no larger than needed to achieve this aim, and should not apply to land in the Green Belt*".

3.29 Beyond the Green Belt the 2026 Framework is clear that Local Plans should not duplicate policies within the Framework. Policy DP3 requires proposals to respond positively to their context, including history, character and the sites setting. Policy DP2 (2) (g) requires proposals to reflect on identify. Policy N2 requires proposals to contribute positively to the natural environment and should consider the environmental qualities of the land proposed for development including landscape character and natural beauty, to conserve and enhance existing features of visual, historic or nature conservation value.

3.30 Cheshire Fresh consider it unnecessary to identify new "Strategic Gap" that will serve to create an additional layer of policy at a local level, where there are other policies within the Framework that serve to protect settlement identify, character, and landscape character.

3.31 Evidence to support the identification of settlement gaps will need to justify the need for settlement gaps in the context of the 2026 Framework. Land should only be included where it is necessary to maintain the separate identifies, and opportunities for development where this would be consistent with the wider growth strategy should be considered where this would not undermine the role of any identified gap.

Settlement Hierarchy

3.32 The 2026 Framework (Policy S2) requires plans to set out a spatial strategy with clear expectations for the local development including the identification of settlements.

3.33 Cheshire Fresh is therefore supportive of the Council's intention to establish a settlement hierarchy within the Plan and support the review of the existing settlement hierarchy. The Scoping Consultation indicates that the council will assess settlements through the consideration of existing 'services and facilities, population, jobs, sustainable transport, retail provision and settlement form'. Whilst the consideration of these factors is important the settlement hierarchy should also reflect the opportunities for growth, including the opportunities for infrastructure improvements, improvements to sustainable transport connections, and the opportunities that could be provided by future development to enhance the sustainability of an area or support the retention of existing services and facilities.

3.34 When establishing the spatial strategy and determining the expectations for growth regard should be given to settlements alignment with economic strategies and other strategies, in the absence of an SDS. This includes the Modern Industrial Strategy

which focuses national investment and policy support on eight key sectors, including advanced manufacturing, as well as supporting those critical enabling sectors such as transport and logistics.

3.35 Crewe is currently identified as a Principal Town, and its ability to accommodate future growth should reflect its strategic connectivity, including its exceptional rail accessibility, and the presence of key IS-8 Sectors. Cheshire Fresh consider that Crewe should continue to be a top tier settlement and should be a key focus for growth.

Spatial Distribution

3.36 As stated in response to the Settlement Hierarchy the 2026 Framework (Policy S2) requires plans to set out a spatial strategy with clear expectations for the local development.

3.37 Paragraph 5.2 lists a range of factors that will influence the distribution of development. Cheshire Fresh agrees that housing need, demand and affordability are relevant considerations. However, has some concerns with the range of factors identified and in particular some of the missing factors.

3.38 Policy S1 of the 2026 Framework, requires plans to plan positively for future growth, meeting development needs of the area as a minimum. This applies to all development needs not just housing. In determining the distribution and location of development, regard must be given to the type of development being planned for. Policy E1, of the 2026 Framework is clear that plans should account for both local needs and wider needs, opportunities for economic growth, investment, relevant market signals, priority places for investment in key sectors set out in the Industrial Strategy. The policy is clear that there is a need to have regard to the specific locational requirements of different sectors.

3.39 The list of factors identified by the Council at 5.25 does not have regard to wider development needs, the specific locational requirements of different sectors, market signals, investment, local or national industrial strategies. The latter of relevance not just to the provision of employment but are also significant to the consideration of both the need and distribution of housing.

3.40 The list of factors also excludes regeneration need; this is contrary to the baseline which identifies that there are areas which experience high levels of deprivation. Including within Crewe. The Distribution of development should also serve to respond to the regeneration needs of an area.

3.41 The Council lists a series of constraints which may influence the distribution of development. Cheshire Fresh note that Policy S1 Positive Plan making is clear that plans should plan to meet their objectively assessed needs, as well as any needs that cannot be met within neighbouring areas unless the application of policies relating to habitats sites and/or designated as Sites of Special Scientific Interest;

land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets; and areas at risk of flooding or coastal change, provide a strong reason for restricting the scale and or distribution.

3.42 When determining the spatial strategy regard should be given to the nature of constraint and should differentiate between environmental constraints and planning constraints such as Green Belt and Strategic Gaps which should be reviewed.

3.43 As indicated in the context of the Settlement Hierarchy, distribution should also have regard to strategic connections, including sustainable transport, and should have regard to the ability to improve existing transport infrastructure, reflect on opportunities for growth, and alignment with national and sub regional strategies, including evidence base used to inform the development of the future sustainable development strategy, if one is not in place during the preparation of the Plan.

3.44 Having regard to the scale of the LHN figure for Cheshire East. Cheshire Fresh agree that the distribution will need to consider a range of options including urban extensions and potentially new settlements. Fundamentally, the Spatial strategy should ensure **that sufficient land of the right type and location is available to meet the identified needs**, as well as any needs that cannot be met within neighbouring areas

3.45 Cheshire Fresh consider that Crewe, should be a focus for growth, reflect its strategic connectivity, including its exceptional rail accessibility, and the presence of key IS-8 Sectors. Its land at Red Hall Farm, provides a suitable, available and achievable opportunity to meet needs for housing and employment in Crewe.

Development in the Countryside

3.46 Paragraph 5.29 of the Scoping Document states that national decision making policies will establish the overall approach to development outside settlements.

3.47 Policy S3 of the 2026 Framework states that decisions on developments should apply a presumption in favour of sustainable development. Policy S5 establishes the approach to considering development outside settlements. Policy PM6 (c) is clear that plans should not include policies which duplicate, substantially restate, or are inconsistent with the content of national decision making policies. The need to avoid duplicating, restating or inconsistent policies within Plans is also a component of the Tests of soundness for local plans, as established through Policy PM15.

3.48 Annex B provides a definition of Settlements for the purpose of the application of Policy S4 and S5. Settlements are defined as "*cities, towns, villages and other predominantly built-up areas, including land which is allocated or has permission for development which will form part of the built-up area once the development is complete. This includes areas defined as a settlement in the development plan (whether using defined settlement boundaries or equivalent terms, or criteria for*

identifying settlement extents where boundaries have yet to be defined). Settlements do not include hamlets and scattered groups of houses located outside predominantly built-up areas, unless specifically defined as a settlement in the development plan. For the purpose of this Framework, they also exclude villages which lie within and are defined as part of the Green Belt in the development plan"

3.49 Cheshire Fresh consider that if the Council intend to retain settlement boundaries these should not be defined too tightly, in order to unreasonably constrain growth and limit flexibility. A criteria based approach would be supported. Cheshire Fresh would welcome an opportunity to engage with the council on an appropriately worded criteria based policy.

Housing

3.50 Cheshire Fresh welcomes the Council's ambition in paragraph 5.30 to unlock economic prosperity". Cheshire Fresh note that the ambition should be to meet the needs for homes in the right places and not just affordable homes. The provision of homes of all types, sizes and tenures is critical to attracting and retaining labour supply necessary to support economic growth ambitions.

3.51 Cheshire Fresh reiterate that Policy PM2 requires Local Plans set out a positive strategy and to accommodate development needs. Policy S1 is clear that Plans should "plan positively for future growth and change" and should seek "to meet the development needs of their area, as a minimum". With respect to housing Policy HO2 requires housing requirement figures to reflect the extent to which identified needs can be accommodated as a minimum and be higher than the figure derived from the local housing needs assessment, where appropriate. This includes where there is unmet need from neighbouring areas or to reflect the growth ambitions linked to economic development or infrastructure investment

3.52 Cheshire Fresh agrees the need for a Housing Needs Assessment. Cheshire Fresh reiterates the points made above in respect of housing evidence, the local housing needs assessment determines the minimum number of homes needed, the housing requirement should consider any needs that cannot be met within neighbouring areas and reflect growth aspirations. The Council's Housing Needs Assessment/Housing Market Assessment and wider housing evidence should therefore consider the outputs of the standard method, unmet need, alignment of housing growth with the economic strategy or any significant growth or infrastructure investment, as well as the needs for affordable housing, the appropriate mix, type and tenure of housing, and the needs for different groups, such as older people.

Affordable Housing

3.53 Cheshire Fresh support the need to understand the scale of affordable needs across the different local housing market areas within Cheshire East. The evidence on affordable homes should establish the need and type of need and make

recommendations for the appropriate contributions towards meeting affordable housing requirements from developments. PM12 requires policies to identify the level and type of affordable housing provision but is clear that policy requirements should be set at a level that allows for the planned types of development and sites to be deliverable. This is essential to maximise certainty for developers and land promoters. Policies are required to be clear and unambiguous.

3.54 Cheshire Fresh consider that the policy requirements in relation to affordable housing should be sufficiently flexible, acknowledging that type and tenure requirements may change during the plan period.

Housing Mix

3.55 Cheshire Fresh supports the use of the Housing Needs Assessment to identify the need for different size, type and tenure of homes across the Plan Area. Cheshire Fresh note that the policy should allow for some flexibility, given the propensity for housing needs to change over time. This will enable developments to respond positively to changing needs. This need for flexibility and ability to respond to changing circumstances is reflected in the 2026 Framework Policy HO13, which in relation to proposals on strategic sites requires the consenting framework to be "*flexible enough to respond positively to changing circumstances as phases are brought forward, including changes to housing need, infrastructure requirements, viability, and design".*

Housing for older people and specialist accommodation.

3.56 Policy HO1 of the 2026 Framework requires plans to assess the needs for older people, with policy HO5 requiring policies to address the needs of different groups including older people. Policy HO5(c) requires the plan to address the identified needs, and states that this includes identification of sites to accommodate specialist housing for older people where there is an identified need and (d) set expectations for mix of tenures.

3.57 Cheshire Fresh therefore consider that the needs for older people should be based on a robust evidence base. Cheshire Fresh note that older person's accommodation is typically delivered by specialist operators, with specific operator requirements. Where the Council identifies sites to accommodate specialist housing for older people, this must be done with engagement with operators, in order to ensure that the sites are appropriate and capable of being delivered.

Self and Custom Build Housing.

3.58 Cheshire Fresh notes that Policy HO1 requires plan makers to assess the needs for people wishing to build their own home, and Policy HO5 of the 2026 Framework requires the plan to set out policies to address the housing needs of different groups including the identification of sites for self and custom build. Cheshire Fresh considers therefore that the need for self and custom build should be robustly

evidenced, and that the identification of sites is not the only means of meeting the requirements.

3.59 Cheshire Fresh considers that the need to identify sites for self and custom build should be considered in the context of the 2026 Framework, which establishes a more positive decision making framework, which would support opportunities for self and custom build housing, though Policy S4, L2, and S5. Cheshire Fresh consider that a locally specific policy that supports or encourages provision of for self and custom build where there is sufficient demand maybe more appropriate.

Housing Diversification and Providing For Small and Medium Sized Sites.

3.60 Cheshire Fresh support the provision of a diverse mix of sites, through the Local Plan, this is consistent with the 2026 Framework (Policy HO6) and Policy PM9, the latter requires the identification of a sufficient range and quantity of potential sites.

3.61 Policy HO4 of the 2026 Framework also requires development plans to identify suitable locations for strategic sites for housing led developments. Cheshire Fresh note that having regard to the scale of housing needs across Cheshire East that a range of sites including large urban extensions and new settlements are likely to be required. Cheshire Fresh agree with this assumption and consider that there is a significant role for larger extensions and strategic sites within the plan to support the delivery of sufficient homes to meet identified needs, alongside an appropriate mix of smaller sites. Cheshire Fresh consider that it is important for the Plan to recognise the role of large and strategic sites will play in housing delivery.

3.62 Cheshire Fresh consider that Land at Red Hall Farm / west of Middlewich Road, presents such an opportunity and is consistent with the provisions of HO4, in that it is capable of being supported by the necessary infrastructure and facilities, as well as delivering new facilities, and capable of supporting a sustainable community with sufficient access to services and employment opportunities both within the development and adjacent to the development with good access by sustainable transport modes to the wider services and facilities within Crewe.

Housing Standards

3.63 Cheshire Fresh does not support the adoption of enhanced housing standards in relation to accessible and adaptable dwellings, water efficiency, or NDSS, in the absence of clear and robust evidence to support any increase in standards, including evidence that assesses the impact on viability. This is consistent with Policy PM13, which is clear that quantitative standards must not cover matters already addressed by building standards, with limited exceptions, and in all circumstances requires appropriate justification, and should not have an adverse impact on viability.

3.64 Cheshire Fresh reserves the right to review any forthcoming evidence and comment further.

Employment and Economy

3.65 Cheshire Fresh welcomes the Council's acknowledgment that it has a strong and resilient economy including the commitment to unlock prosperity for all, and the need to take account of the Industrial Strategy, Cheshire and Warrington Sustainable and Economic Strategy, the Local Industrial Strategy, and the Strategic Economic Plan.

3.66 Cheshire Fresh agrees with the Council that it will need to undertake an assessment of needs considering the above strategies and in allocating sites it will need to account for the locational requirements and needs of specific sectors.

3.67 As discussed in response to the Housing section the Council's Housing Needs Assessment/Housing Market Assessment and wider housing evidence should consider alignment of housing growth with the economic strategy or any significant growth or infrastructure investment.

Transport and Infrastructure

3.68 Cheshire Fresh agree with the Council that transport and infrastructure are essential to supporting sustainable communities and sustainable growth across the Plan area. Cheshire Fresh welcome the acknowledgment of a vision-led approach to transport planning, this is consistent with the 2026 Framework.

3.69 The Scoping Document highlights that an Infrastructure Delivery Plan will be developed. Policy PM 2 of the 2026 Framework requires plans to identify contributions to be expected from development towards on and off site infrastructure that are necessary to support the delivery, Contributions are also required to be reasonably related to the development. Requirements should not be set at a level that renders development unviable. It is important that the IDP is sufficiently clear and identifies existing transport (and other infrastructure) capacity issues, that evidence clearly determines the impacts of the proposed development, and clearly establishes the required mitigation, costs, achievability, funding sources, and the bodies responsible for delivery. The outputs should inform the whole plan viability assessment.

Natural Environment

3.70 Cheshire Fresh agree that evidence will be required in the form of Strategic Flood Risk Assessment, and Climate Change and Renewable Energy Study, and welcome the opportunity to engage with the Council and their consultants on the preparation of evidence where appropriate.

3.71 Cheshire Fresh note that the 2026 Framework establishes a series of clear decision making policies in relation to the Natural Environment. Including policies relating to meeting the challenge of climate change and conserving and enhancing the natural environment. Cheshire East should review the 2026 Framework and ensure that any

proposed policies addressing the Natural Environment do not duplicate, restate the content of national decision making policies.

Health and wellbeing

3.72 Cheshire Fresh welcomes the acknowledgement at paragraph 5.105 that key health determinants include access to suitable housing, and employment opportunities. Cheshire Fresh support the role of the Local Plan in 'encouraging' active travel within new developments. Policies should not mandate active travel measures on all sites, as the ability, and suitability of sites to accommodate active travel measures will vary on a site by site basis, having regard to the scale of development proposed and the location.

Climate Change and Climate Change Adaptation

3.73 Cheshire Fresh acknowledges the Council's ambition in relation to Climate Change and supports the need for evidence relating to Climate Change and Renewable Energy. As set out above in relation to housing standards Cheshire Fresh does not support the inclusion of enhanced standards, including energy efficiency in the absence of clear and robust evidence to support any increase in standards, including evidence that assesses the impact on viability. Cheshire Fresh reserves the right to review any forthcoming evidence and comment further.

3.74 With particular reference to energy efficiency in homes, Cheshire Fresh highlights the recent Ministerial Statement made on 24 March 2026 "Future Homes and Building Standards".[12] The statement introduces the Future Homes and Building Standards establishing that they will "*ensure that new homes and buildings in England will have good quality building fabric, and crucially, be fitted with low carbon heating such as heat pumps. They will be 'zero carbon ready' meaning they will naturally become zero carbon over time, as the electricity grid fully decarbonises, without the need for any retrofitting* ". It further states that *"Implementing these standards marks a pivotal step for the sector in our pursuit of net zero. It sets out a clear route towards delivering homes and buildings that are prepared for the future in their enhanced energy efficiency, low carbon heating, and improved protection against overheating. This approach supports the transition to a cleaner, greener built environment, ensuring new homes are 'zero carbon ready' and resilient to the impacts of climate change.*"

3.75 When preparing the Plan and considering and additional standards relating to energy efficiency, or vehicle charging, it is essential that regard is given to existing standards and regulations. Policy PM13 is clear that Quantitative standards must not cover matters already addressed by building standards, with limited exceptions,

[12] Written statements - Written questions, answers and statements - UK Parliament

in all circumstances requires justification, and not have an adverse impact on viability.

Recreation

3.76 Cheshire Fresh agree that evidence relating to Sports and Recreation facilities is required and supports the inclusion of evidence on indoor built facilities, playing pitch strategy, and open space assessments. It will be important to consider the implications of outputs on viability, with resultant standards assessed through whole plan viability. Cheshire Fresh welcome the opportunity to engage with the Council and its consultants on the preparation of the evidence and reserve the rights to make comments following the publication of evidence.

Design

3.77 The baseline section of the Scoping Document recognises that Cheshire East is a diverse area, accordingly the Local Plan must resist the development or inclusion of a policy that is overly prescriptive and will not support developments responding to specific site conditions and locations. Care should be taken to ensure that any policy on design is locally distinctive and avoids duplicating or restating the principles established within the 2026 Framework. The development of a broader policy which establishes the local design considerations, or framework for the preparation of design codes is likely to be more appropriate.

3.78 The 2026 Framework includes support for the use of design guides, design codes. Policy DP1 indicates that plans should set out clear expectations identifying where design guides, design codes and masterplans are necessary to achieve place making outcomes. Cheshire Fresh note that any policies that set out design expectations, circumstances where design guides, design codes and or masterplans are required, and locally specific design policies must be clearly written and unambiguous. This includes expectations relating to who is responsible for the preparation of design codes.

3.79 Cheshire Fresh would not support the use of a single design code for the whole of the plan area, due to the diversity of the area, any single design code is likely to be too generic, and unable to respond to the character of specific sites or areas. Cheshire Fresh highlight that Policy DP2 of the 2026 Framework requires design guides, design codes, and masterplans to be informed by an understanding of the economic context and conditions for implementation. Accordingly, Design Codes prepared by the Local Authority must be developed through engagement with relevant stakeholders including, landowners, developers and site promoters.

Local Plan Evidence

3.80 The scoping report sets out the intention to undertake an SA/EOR subject to regulations, Cheshire Fresh welcomes the opportunity to engage in the preparation of the SA, including the framework for assessing policies and sites.

3.81 With respect to the Economy, the Scoping document identifies the need for new evidence on Employment Land Needs. It is vital that this evidence is aligned with the evidence on the need for housing to ensure that lack of housing delivery does not constrain economic growth of the District. The outcomes should be reflected in the Housing Needs Assessment.

3.82 It is agreed that an updated Open Space Assessment and Strategy, Strategic Flood Risk Assessment, Landscape Character Assessment, Blue and Green Infrastructure evidence, infrastructure Delivery Plan, and Transport Modelling are required.

3.83 Cheshire Fresh agrees that a Whole Plan Viability assessment is required. There is a need to test the plan through robust Whole Plan Viability assessment. The 2026 Framework requires plans to be aspirational but deliverable, and the cumulative cost of policy requirements must not be set at a level which undermines the delivery of housing, employment land, infrastructure and other strategic allocations. The viability evidence should therefore assess the combined impact of affordable housing, infrastructure contributions, design standards, environmental requirements, Green Belt and grey belt policy obligations, and any other plan-wide requirements across a representative range of site typologies and strategic locations. This work must be undertaken transparently and iteratively, with input from landowners, developers, infrastructure providers and affordable housing providers, so that emerging policies are realistic, deliverable and capable of supporting sustainable growth. Without robust viability evidence, there is a clear risk that the Plan would allocate sites or impose policy requirements which cannot be delivered in practice, thereby undermining housing and employment delivery and prejudicing the soundness of the Local Plan, particularly in relation to whether it is positively prepared, justified and effective

4 Land at Red Hall Farm (Weavers Green)/ HE112 (Land West of Middlewich Road)

Site Context

4.1 The site was submitted through the Council's call for sites; the latest submission was on 20th March 2026. A vision document was submitted alongside the earlier call for sites. The Proposed Development is located to the north west of Crewe and is accessible from Middlewich Road. The Site is subject to a current application relating to 113 ha for the delivery of up to 2,100 residential dwellings, 6,080 sqm of employment floorspace, 4,180 sqm of retail and health services, and provision for a three form entry primary school in an accessible and sustainable location.

4.2 The site represents an opportunity to make substantial contribution towards meeting the significant housing needs in Cheshire East in a way that makes efficient and attractive use of the land. Development here would enable growth in an appropriate location supporting the delivery of much needed homes, meeting local housing needs, in an area which is a regeneration focus for the district.

Available

4.3 The Site is available, and as identified above Cheshire Fresh has submitted a planning application to enable the early delivery of the scheme in a coordinated and phased manner. The site is therefore available in accordance with national guidance.

Suitable

4.4 The proposed development represents an efficient and attractive use of land, located in a sustainable location on the north eastern edge of Crewe. The site is well located, with easy access to amenities within Crewe, local employment opportunities, including Leighton Hospital. It is well connected to the Strategic Road Network with direct links to the A530 (Middlewich Road), and close to the Shavington Bypass, connecting to the A534, the A500 and the M6 Motorway. It is accessible by public transport, with the nearest bus stop 250m from the edge of the Site. It forms a logical extension to the settlement.

4.5 The proposed development will deliver a range of socio economic benefits including:

- Creation of 457-722 FTEs over the lifetime of the construction.
- 332-346 FTE's during the operation of the development.
- Generate 28.1 to £29.3 million in GVA per annum during the operation of development.
- Generate circa £3.66 -£5.03 million in Council Tax.

- Includes provision for a new/rerouted bus service into the Site.
- Incorporates a traffic free route supporting an east west active travel link from the centre of the Site to Middlewich Road and Leighton Hospital.
- Deliver 20 hectares of natural and semi natural green spaces.
- Include a new Active Track, to promote active lifestyles.
- Achieve a net gain in biodiversity.
- Exceed the Future Homes Standard target of 75-80% reduction in carbon emissions.

4.6 The proposed development would be designed to a high standard, integrating sensitively with its surroundings and including appropriate landscape screening. Technical work supporting the preparation of the vision confirms that there are no known physical or environmental constraints to development. Accordingly, the site is considered suitable for allocation in line with national policy.

Achievable

4.7 Technical work undertaken to support the current Planning Application, with respect to access and transport, flood risk, ecology and ground has indicated that there are no known constraints that could not be suitably mitigated and that would prevent the site coming forward within the plan period. Development of the site is considered achievable.

Phasing

4.8 The site is available, and suitable and can be delivered in the short term, with technical assessments undertaken to date demonstrating that the site is achievable. The Masterplan has been designed to support the ability of the Site to come forward in phases, with initial phases capable of early delivery.

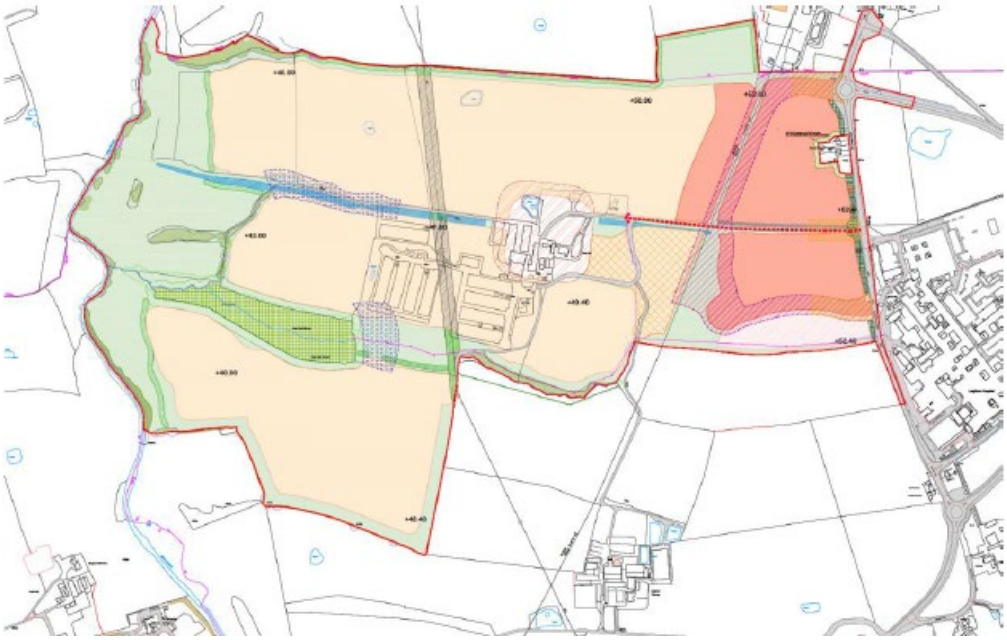


Figure 1 Extract of Combined Parameters Plan

Conclusion

4.9 The Land at Red Hall Farm/ to the West of Middlewich Road presents an opportunity to make a significant contribution to the Council's housing need. The site is "available", "suitable" and "achievable". Therefore, in accordance with national planning policy and guidance the site is appropriate for allocation in the Local Plan.

Spawforths
planners architects