

Cheshire East Local Plan Scoping Consultation Response

September 2026

On behalf of Lostwood Estates Ltd

Increase in Housing Requirements

The Council must ensure that it can meet its identified housing needs in full through a realistic and deliverable strategy.

Policy S1 of the NPPF 2026 requires development plans to plan positively for future growth and change and, as a minimum, to seek to meet the development needs of their area. In the absence of an adopted Spatial Development Strategy, this means providing for objectively assessed housing needs, supporting infrastructure and other uses, subject to the limited circumstances identified in national policy. The revised standard method requirement will require the Council to plan positively for a much more significant level of housing growth than previously planned for. The Local Plan should therefore identify a genuinely deliverable and resilient portfolio of locations capable of delivering substantial numbers of homes alongside supporting infrastructure, community facilities and environmental enhancements. This should include appropriate Open Countryside and sustainable settlement-edge locations. Policy HO2 also makes clear that housing requirement figures should reflect the extent to which identified needs can be accommodated over the plan period as a minimum and may appropriately be higher where necessary to reflect wider growth ambitions.

Spatial Development Strategy

It is acknowledged that Cheshire East is now part of the Cheshire and Warrington Combined Authority area and will be required to prepare a Spatial Development Strategy (SDS) for Cheshire and Warrington. This is welcomed and presents a positive opportunity for sustainable development in Cheshire East and across the sub-region. Policy PM1 of the NPPF 2026 requires an SDS to set a positive vision for future growth and change at a sub-regional scale and to provide a clear spatial framework for investment and growth. It is further welcomed that the Council acknowledges national policy is clear that local plan preparation should not be delayed.

The Spatial Development Strategy should provide a positive and deliverable framework for meeting the sub-region's development needs and, under Policy PM1, should plan across a period of at least 25 years. Its role is strategic: it should identify the broad distribution and broad locations for growth, while the Local Plan remains the appropriate mechanism for detailed site allocations and locally specific policy. The emerging SDS should therefore not become a reason for delaying the Cheshire East Local Plan or deferring assessment of sustainable individual sites. Where an SDS housing requirement is subsequently established, Policy HO2 provides that the figure should not be retested through Local Plan preparation unless there has been a significant change in circumstances affecting the overall requirement or its distribution. In the meantime, the

Local Plan should progress the evidence, site-selection and allocation work necessary to deliver a positive and resilient strategy.

Supplementary Planning Documents including Design Guide

Lostwood Estates Ltd supports the objective of securing high-quality and locally distinctive development. However, the Council should establish its principal design expectations through a strategic design framework prepared as an integral part of the Local Plan, rather than deferring significant policy requirements to subsequent supplementary guidance.

This is particularly important where design requirements affect density, developable area, housing typologies, parking, landscaping, materials or other matters with cost and viability implications. Establishing these expectations through the Local Plan process would allow them to be tested through whole-plan viability assessment, thereby providing greater certainty that allocated sites can deliver the quantum of development assumed by the Plan.

Any strategic framework should set clear principles while retaining sufficient flexibility for site-specific masterplanning and design codes to respond to local character, site circumstances, market requirements and changing methods of construction over the lifetime of the Plan. Early engagement with housebuilders, landowners and other delivery partners should form part of its preparation. The Council should also have particular regard to Policy PM6 of the NPPF 2026, which requires development plans to avoid policies that duplicate, substantively restate or are inconsistent with national policies for decision-making.

Plan Period

Lostwood Estates Ltd considers that the Council should give careful consideration to whether a plan period longer than the national minimum would provide a more effective long-term strategy. Policy PM2 of the NPPF 2026 requires Local Plans to set out their spatial strategy, minimum development provision, allocations and broad locations for growth for a period of no less than 10 years from adoption. Importantly, national policy expressly allows Local Plans to cover a longer period where this would, for example, support the delivery of longer-term infrastructure or strategic development.

Accordingly, the five-year review mechanism should not be treated as a substitute for selecting an appropriately long planning horizon at the outset. Reviews ensure policies remain effective and up to date; they do not remove the need to plan comprehensively for growth, infrastructure investment and strategic development over a period which reflects local circumstances.

Given the scale of housing growth which Cheshire East will need to accommodate, the lead-in times associated with strategic infrastructure and larger housing sites, and the emerging Cheshire and Warrington SDS with its minimum 25-year strategic horizon, there is a strong case for a Local Plan period longer than the minimum 10 years where this would improve certainty and delivery. The proposed 15-year period is capable of complying with national policy, but the Council should demonstrate that it is sufficiently long to plan effectively for the full infrastructure and development implications of the strategy and to provide a robust supply of development opportunities throughout the plan

period. This is directly relevant to the land north of Bradeley Hall Farm, where the potential long-standing North East Crewe Bypass alignment illustrates the need to coordinate future growth with strategic infrastructure over an appropriately long planning horizon.

Planning for Growth

The new Local Plan should plan positively for growth in accordance with Policy S1 of the NPPF 2026 and provide sufficient flexibility to ensure that identified housing needs can be met throughout the plan period. The strategy should be based on realistic assumptions regarding site delivery, infrastructure and market capacity, and should avoid relying on an overly constrained or marginal supply of land. Policy HO3 requires Local Plans to identify a sufficient supply and mix of sites to meet or exceed the housing requirement over the plan period; the Council should therefore build resilience into the strategy rather than plan only to the minimum numerical requirement.

A sufficient range and choice of deliverable and developable sites should be identified across the Borough, including appropriate contingency and flexibility to respond to changing circumstances. This will help to maintain housing delivery, support investment in infrastructure and services, and reduce the risk that the Plan becomes out of date because individual allocations do not progress at the rate anticipated.

Settlement Hierarchy

The settlement hierarchy should be informed by up-to-date evidence of the role and function of settlements, including access to services, employment, public transport and infrastructure. It should provide a framework for directing growth, but should not operate as a rigid ceiling on development where a settlement is capable of accommodating additional sustainable growth.

The Council should consider the capacity of settlements to support new housing and the opportunities for development to sustain local services, facilities and public transport. The hierarchy should therefore be capable of reflecting differences in sustainability and development potential within and between settlements, rather than relying solely on historic classifications.

Where settlements are well located, have an established range of services and facilities, and can accommodate growth without unacceptable impacts, the Local Plan should allow an appropriate scale of development to contribute towards meeting the Borough's housing requirement.

Spatial Distribution

The spatial distribution of development should be based on a transparent assessment of sustainability, housing need, infrastructure capacity, deliverability and market considerations. It should ensure that growth is distributed across the Borough in a manner which supports sustainable communities and provides a realistic range and choice of housing sites.

The strategy should not become over-reliant on a small number of large strategic allocations or on an assumption that windfall development will continue to make up any shortfall. A more robust approach is to plan for a genuine margin of flexibility, including

a range of smaller and medium-sized deliverable sites in sustainable settlements. This would provide resilience where major sites are delayed, improve market choice and help maintain a consistent trajectory of housing delivery across the plan period. This approach is reinforced by Policy HO6 of the NPPF 2026, which requires Local Plans, unless there are strong reasons otherwise, to allocate land accommodating at least 10% of the housing requirement on sites no larger than one hectare and a further 10% on sites between one and two-and-a-half hectares.

A balanced portfolio of sites across different settlements and market areas will provide greater resilience and help maintain housing delivery throughout the plan period. Policy HO6 also requires Local Plans to allocate sites which support and enhance the vitality of rural communities and enable villages to grow and thrive, especially where this will support local services. This reinforces the need for the spatial strategy to consider sustainable growth opportunities across Cheshire East rather than concentrating delivery in a small number of locations or site types.

Where sustainable opportunities exist at settlement edges, including land currently within the open countryside where release is justified through the plan-making process, these should be assessed consistently alongside brownfield and non-Green Belt alternatives including open countryside locations.

Strategic Green Gaps and Settlement Gaps

The preparation of the new Local Plan provides an appropriate opportunity to undertake a comprehensive and evidence-based review of the extent, purpose and continued justification for existing Strategic Green Gap and other settlement gap designations. Green Gap policy should be clearly distinguished from Green Belt policy, and existing boundaries should not simply be treated as fixed constraints or rolled forward without an up-to-date assessment of the contribution made by individual parcels.

This review is particularly important having regard to Policy S2 of the NPPF 2026, which provides that designations and associated policies intended to safeguard gaps between settlements should be used only where necessary to maintain the separate identities of settlements and their physical separation, should be no larger than necessary to achieve that purpose, and should not apply to land within the Green Belt. The Council should therefore ensure that any Green Gap designation is necessary, proportionate and supported by robust and up-to-date evidence.

A parcel-based assessment should form part of the site-selection and Sustainability Appraisal process, particularly on settlement edges. Land should not remain subject to a restrictive designation simply because it forms part of a wider historic Green Gap where development of the particular parcel would not materially undermine settlement identity, result in unacceptable coalescence or compromise the effective physical separation between settlements.

The review should therefore actively identify opportunities where residential development could be accommodated while retaining the essential function of the Green Gap. Carefully planned development, supported where necessary by appropriate landscape buffers, green infrastructure, open space and sensitive settlement-edge design, may allow

an effective physical and/or visual gap to be maintained while also making an important contribution towards meeting identified housing needs.

Where the evidence demonstrates that land does not make an essential contribution to maintaining the separate identity and physical separation of settlements, or that development could take place without materially undermining the overall function of the gap, the designation should not operate as an automatic barrier to the allocation of that land for residential development. The emerging Local Plan should therefore review existing boundaries critically and ensure that any retained Green Gap is no more extensive than is demonstrably necessary to perform its identified function, consistent with Policy S2 of the NPPF 2026.

Land North of Bradeley Hall Farm

Lostwood Estates Ltd has a specific land interest north of Bradeley Hall Farm comprising approximately 50.4 acres of predominantly grassland. The whole site is currently designated as Green Gap and forms part of the intervening land between the Crewe suburbs of Sydney, Maw Green and Coppenhall to the west and Haslington to the east.

The context of the site is evolving. Substantial residential proposals are being advanced on adjoining land to the immediate west at Maw Green and to the south of the site. These changes reinforce the need for the Council to assess the function of the Green Gap at parcel level and against the future, rather than historic, pattern of development. The continued inclusion of the whole site within a Green Gap should therefore not be assumed without testing whether all of the land remains necessary to maintain settlement identity and physical separation.

The site also has substantial frontage to the Haslington-Winterley A534 Bypass, with an established agricultural access. In addition, a North East Crewe Bypass connection to the A534 has been considered over a significant period and could potentially utilise part of the site together with adjoining land to the west. This creates an opportunity for the Local Plan to consider housing growth and strategic transport infrastructure in a coordinated manner, including whether development could help facilitate or safeguard an appropriate future infrastructure corridor.

For these reasons, the land north of Bradeley Hall Farm should be specifically assessed through the Green Gap review, site-selection process and Sustainability Appraisal. The assessment should consider whether all of the existing designation is necessary, whether part of the site could be released for a logical and sustainable extension to Crewe, and whether an appropriately designed scheme could retain an effective gap towards Haslington while contributing to housing delivery and longer-term infrastructure objectives.

Development in Settlements

Policy should support appropriate development within settlements and at sustainable settlement edges where it can be integrated with the existing built form and supported by necessary infrastructure. Settlement boundaries which include open countryside should be reviewed as part of the Local Plan rather than treated as fixed limits based on historic patterns of development.

Development within and adjacent to settlements can make efficient use of existing services and infrastructure, support local shops and facilities and provide opportunities for walking, cycling and public transport. The scale and form of development should respond to local character and site circumstances while making effective use of land.

The Local Plan should provide sufficient flexibility to accommodate windfall, infill, redevelopment and planned settlement-edge growth where proposals are sustainable and do not give rise to unacceptable environmental or infrastructure impacts. This should also apply to Open Countryside locations where sites are demonstrably sustainable and well related to existing settlements.

Development in the Open Countryside

The emerging evidence base for the new Local Plan should include an up-to-date Settlement and Infill Boundaries Review which properly assesses all land adjacent to existing settlements.

The assessment should be transparent, consistent and up to date, and should specifically identify land which falls within the open countryside.

Policies for the open countryside should protect valued landscapes and environmental assets while recognising that countryside policy should not operate as an absolute or undifferentiated constraint on sustainable growth. The NPPF 2026 draws a clear distinction between development within settlements and development outside them. Although Policy S5 is a national decision-making policy rather than a site-allocation policy, it is nevertheless important context for plan preparation because it expressly recognises circumstances in which residential and mixed-use development outside settlements can be acceptable, including development within reasonable walking distance of a well-connected station and development addressing an evidenced unmet need where it is physically well-related to an existing settlement and of a scale capable of being supported by existing or proposed infrastructure. The Local Plan evidence base should therefore distinguish genuinely isolated countryside development from sustainable settlement-edge opportunities.

Where land outside existing settlement boundaries is required to meet identified development needs, the Local Plan should assess opportunities through the site selection and sustainability appraisal process on their merits. Particular consideration should be given to sites that can form logical extensions to settlements, make use of existing or planned infrastructure and establish clear, defensible long-term boundaries. Policy S2 requires the spatial strategy itself to identify settlement boundaries and sites allocated to meet identified housing and other needs. Existing countryside boundaries should therefore be reviewed through the new Plan rather than treated as fixed constraints inherited from the previous strategy.

Affordable Housing

Lostwood Estates Ltd welcomes the recognition that housing affordability remains a significant challenge across Cheshire East and that housing needs and affordability vary considerably across the borough. While affordable housing delivery since 2010 has been strong, exceeding the Local Plan Strategy requirement does not necessarily mean that

current or future needs are being met, particularly for lower-income households and in rural communities where the supply of affordable homes can be especially limited.

The new Local Plan should recognise the important role that suitable development in Green Gaps and Open Countryside locations can play in meeting these needs. Such locations may provide particularly viable opportunities for affordable housing delivery, subject to site-specific land values, infrastructure requirements and other development costs, while maintaining a deliverable scheme.

The Plan should therefore provide sufficient flexibility for suitable Open Countryside and rural sites to come forward where they can demonstrably meet identified local housing needs, rather than relying predominantly on development within higher-value or more constrained settlements. This should be supported by robust, locally specific evidence on housing need, tenure and development viability.

Housing Mix

Lostwood Estates Ltd supports the preparation of an up-to-date borough-wide Housing Needs Assessment to inform the new Local Plan. However, the assessment should provide an evidence base rather than establish a rigid requirement for the precise mix of homes to be provided on every residential site.

The appropriate housing mix will vary across Cheshire East according to local housing needs, demographic characteristics, existing housing stock, site characteristics, market demand and the nature and location of the development proposed. Any policy should therefore expressly allow borough-wide evidence to be applied flexibly at site level, taking account of up-to-date local need and demand, market conditions, site characteristics, development viability and the objective of creating mixed and balanced communities.

This flexibility will also allow developments to respond to changing demographic and market circumstances during the lifetime of the Plan, rather than applying a fixed housing mix derived from evidence which may become increasingly dated.

Housing Standards

Lostwood Estates Ltd supports the delivery of high-quality, energy-efficient homes. However, requirements relating to the technical construction and performance of new homes should remain aligned with national policy and Building Regulations.

The Local Plan should avoid locally specific technical standards which duplicate or conflict with national requirements. However, Policy PM13 of the NPPF 2026 expressly allows certain quantitative standards where the policy tests are met. In relation to energy efficiency, any standard going beyond current or proposed Building Regulations must have a clear and robustly costed rationale demonstrating that it will not adversely affect development viability and deliverability. Any such standard should also be expressed in the form required by national policy. The correct approach is therefore not to rule out enhanced local standards in principle, but to require the Council to demonstrate that any proposed standard is necessary, proportionate, appropriately formulated and viable.

Additional local standards can create duplication and uncertainty, increase development costs and affect housing affordability and delivery. Any requirements proposed through the Local Plan should therefore comply fully with Policy PM13 and be robustly evidenced and reflected cumulatively in the whole-plan viability assessment, alongside affordable housing, infrastructure, biodiversity and other policy obligations. The Plan should also avoid policies which duplicate, substantively restate or conflict with national decision-making policy, consistent with Policy PM6.

Climate Change Adaptation

Lostwood Estates Ltd supports the objective of addressing climate change and ensuring that new development is resilient to future conditions. The Local Plan should focus on matters that are properly addressed through spatial planning, including sustainable locations, green infrastructure, flood risk, landscape, biodiversity and the design of resilient places.

Detailed technical requirements relating to the construction and energy performance of new homes should remain consistent with the national regulatory and planning policy framework. Any locally specific requirements should be justified by robust evidence and tested through the cumulative whole-plan viability assessment. The Plan should otherwise focus its climate-change strategy on matters properly addressed through spatial planning, while ensuring any optional technical standards comply with the specific national policy tests.

