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Cheshire East Council
Delamere House
Delamere Street
Crewe
CW1 2LL

1st September 2026

Submitted on Council portal and sent via email

Dear Sir / Madam,

CHESHIRE EAST LOCAL PLAN REVIEW SCOPING CONSULTATION - REPRESENTATIONS ON BEHALF OF THE DUCHY OF LANCASTER

CBRE Limited has been instructed by the Duchy of Lancaster ('the Duchy') to submit the following representations in response to the Cheshire East Local Plan Review Scoping Consultation.

The Duchy made submissions to both the 2024 and 2026 Call for Sites in relation to sites at Radway Green and land adjacent to J16, and this submission builds on the comments made in those submissions. Both of the sites have been put forward for employment led development. For context site plans have been enclosed at Enclosure A.

Background to The Duchy of Lancaster

The Duchy of Lancaster ('the Duchy') is the sole landowner of the Sites. The Duchy is a private landed estate and portfolio of assets held in trust for the reigning British Sovereign since 1399. The Duchy owns circa 3,400 acres of land stretching uninterrupted from the urban area of Crewe to Junction 16 of the M6 and beyond.

The Duchy has been a significant landowner in the Northwest of England since the 14th Century. The Crewe Estate (within which the Sites are located) was offered to the Duchy for sale by the Crewe Family in 1936 and has formed the main component of lands known as the 'Crewe Survey' thereafter.

Scope of Representations

These representations respond to a range of issues raised through the Scoping Consultation and are informed by the Duchy's ongoing promotion of land in Cheshire East. In particular, the representations consider the need for a new local plan, the proposed plan-making approach, approach to the need for employment land and the role that strategic development opportunities can play in supporting the Borough's long-term employment land requirement.

The representations also address matters relating to the emerging spatial development strategy, including the proposed plan period, vision and objectives, the assessment and allocation of development sites, the approach to Green Belt policy, economic growth ambitions, spatial distribution of growth, and the importance of the economy and growth within the borough.

Representations

The representations are structured to respond to the sections in the Scoping Consultation, drawing on the relevant background papers.

The headers of each section below refers directly to the relevant section of the Scoping Consultation questionnaire.

Why Prepare a New Local Plan

The publication of the updated National Planning Policy Framework ('NPPF') in August 2026 underpins the necessity for a new Local Plan. The framework mandates a plan-led system that establishes a positive strategy for growth, investment, and infrastructure. NPPF Policy PM2 dictates that local plans must identify broad locations for significant new housing, jobs, and infrastructure, while fostering sustainable, long-term growth.

The Council's acknowledgement that the Standard Method now requires an annual delivery of 2,530 dwellings further validates the need for a comprehensive review of the Borough's development strategy. This represents a substantial increase in the housing numbers underpinning the existing Local Plan, necessitating a fresh evaluation of how Cheshire East can sustainably facilitate such growth. This expanded housing requirement will naturally drive an increased demand for employment land.

The Duchy strongly advocates for this new Local Plan. The current Local Plan Strategy and the Site Allocations and Development Policies document were formulated in a distinct policy environment, characterised by lower housing targets, different national planning objectives, and preceding major shifts in Government guidance concerning sustainability, housing delivery, and Green Belt policy including the introduction of grey belt policy. The statutory requirement for regular plan reviews, combined with the fact that the current plan period is nearing its conclusion, provides immediate justification for this process.

This new Local Plan represents the opportunity to review previous land supply assumptions and the long-term function of the Green Belt. The Council must ensure the evidence base rigorously evaluates whether current development boundaries, settlement classifications, and Green Belt designations remain valid in the face of significantly higher development requirements and evolving national priorities. A plan-led strategy provides necessary certainty for communities, landowners, and developers, and is preferable to reliance on speculative applications. Therefore, the new Local Plan should designate a sufficient range of sustainable, deliverable sites to meet needs throughout the plan period.

The Duchy supports a plan that is flexible, evidence-based, and ambitious, ensuring all sustainable locations are considered, including Green Belt adjustments, via the formal plan-making process. This approach will allow Cheshire East to facilitate growth in a coordinated, sustainable manner, offering stability for local residents and communities.

Developing the New Local Plan

The Duchy also welcomes the publication of the Local Plan timetable and the Council's dedication to early engagement. The revised NPPF places great emphasis on effective participation, recognising that collaboration with stakeholders helps to identify opportunities, constraints, and infrastructure requirements early on as per PM7 (Initiating plan-making for local plans). Given the streamline timeframe for plan preparation, continuous and meaningful engagement will be vital to ensuring the emerging strategy remains deliverable and underpinned by the necessary evidence as per PM8 of the NPPF (Evidence for plan-making).

In preparing the Local Plan, the Council must ensure that all realistic development options are assessed in an objective and consistent manner. This aligns with the requirements of the plan-making policies in the revised NPPF, such as Policy PM2, which fosters a proactive, long-term growth strategy, as well as Green Belt policies that require authorities to examine all reasonable alternatives before finalising spatial strategies and Green Belt boundaries.

The Duchy supports the Council's ongoing commitment to building a solid evidence base, encompassing transport modelling, Green Belt assessments, and infrastructure planning and would be happy to feed into this where appropriate and necessary. The revised NPPF prioritises proportionate, current, and justifiable evidence to support strategic decisions. This emerging evidence base is critical to ensuring the Local Plan identifies sustainable growth locations capable of meeting housing, employment, and infrastructure requirements throughout the plan period.

Changes to Green Belt policy

The Council should ensure its Green Belt review is conducted objectively, reflecting current policy requirements, housing needs, and sustainability considerations and in accordance with part 3 of GB2 (Assessing existing Green Belt land) of the NPPF.

The Duchy particularly welcomes the introduction of the 'Grey Belt' concept, which acknowledges that not all Green Belt land contributes equally to its designated purposes. The revised NPPF mandates that plan-makers identify Grey Belt land and consider sustainable development opportunities where appropriate. This represents a more nuanced approach than previous frameworks and reinforces the necessity for objective reassessment rather than relying on historical assumptions.

NPPF Policy GB3(2) confirms that exceptional circumstances can occur when development needs cannot be fully addressed through other approaches, such as optimising density or looking beyond the Green Belt. Therefore, the Local Plan must include a robust, evidence-led assessment of Green Belt land and the ongoing validity of existing boundaries.

The Duchy supports the Council's proposal to conduct a comprehensive review of Green Belt matters within the new Local Plan, as recent modifications to national policy have fundamentally changed the context for decision-making. The revised NPPF clarifies that if housing and employment needs cannot be otherwise met, this may justify a review of Green Belt boundaries, provided all reasonable alternatives have been explored.

Economic Growth

The Duchy supports the Council's commitment to ensuring sufficient land is allocated to meet local economic needs, including space for freight and logistics, within the new Local Plan. NPPF Policy E1(1)(C) specifies that, regarding economic growth, development plans should allocate sites in accessible locations to meet identified requirements especially in, "facilitating development to meet the needs of a modern economy". Part 2 of E1 should be noted where it sets out that development plans should not be prescriptive on types of uses or unit sizes that are acceptable on a site. The Duchy would emphasise this is an important factor when considering strategic employment sites given the changes in the market over the plan period. The Economic Growth Strategy must incorporate the housing delivery target and demonstrate ambition regarding job creation within the borough across the plan period.

Spatial Development Strategy (Cheshire and Warrington SDS)

A successful spatial strategy must identify opportunities that can deliver comprehensive growth, encompassing housing, employment, environmental improvements, and necessary infrastructure. The strategy should also acknowledge the need for a variety of delivery mechanisms, including urban regeneration, brownfield redevelopment, urban extensions, and sustainable growth adjacent to existing settlements.

The Duchy supports the creation of a Spatial Development Strategy that proactively addresses the Borough's development requirements while ensuring growth occurs in sustainable, accessible locations. This should include cross-border collaboration with neighbouring authorities. It should balance sustainability, deliverability,

infrastructure capacity, environmental factors, and market demand, while remaining sufficiently flexible to adapt to changing circumstances over the plan period.

Creating a Vision and Objectives

The vision should provide a positive framework for accommodating growth, ensuring that development facilitates broader economic, environmental, and social benefits. The Duchy supports the formulation of a clear, ambitious vision that acknowledges the scale of transformation Cheshire East faces over the new plan period. This vision should recognise that the Borough is operating within a planning context significantly different from that of the current Local Plan. Elevated housing requirements, shifting national policies, evolving economic priorities, climate targets, and mounting infrastructure pressures all necessitate a proactive, growth-focused strategy.

Planning for Growth

The Local Plan should adopt a positive growth strategy in line with Policy S1 (Positive plan-making) of the NPPF, which requires plans to seek to meet development needs in full, unless specific national policy constraints provide a strong justification for restriction or the adverse impacts would substantially outweigh the benefits. Given the scale of housing need in Cheshire East, a broad and flexible strategy capable of leveraging various development opportunities across the Borough is likely required.

The NPPF also mandates that local plans define a vision, spatial strategy, and allocations capable of meeting development needs, while identifying the infrastructure required to support that delivery. Consequently, the Local Plan should establish a clear framework for growth that offers certainty to communities, infrastructure providers, and developers, while ensuring development is directed to sustainable, deliverable locations.

The Duchy supports the Council's approach to preparing a robust evidence base to inform the volume and distribution of development. However, this evidence should not serve merely to highlight constraints; rather, the Local Plan should proactively identify opportunities capable of delivering homes, employment, infrastructure, and environmental improvements in a coordinated manner. The NPPF's overarching objectives state that plans should pursue economic, social, and environmental goals in mutually supportive ways, allowing opportunities to be seized to achieve gains across all three themes cohesively.

The Duchy supports the Council's acknowledgment that the new Local Plan must provide for housing, employment, infrastructure, and other development needs to support sustainable growth. The emerging Local Plan is being developed in a context markedly different from that which shaped the existing Development Plan. The significant rise in housing need, changes in national policy, and evolving economic priorities and employment land required necessitate a thorough reassessment of how growth is planned and delivered across the Borough. The revised NPPF is explicit that development plans must "plan positively for future growth and change" and, at a minimum, endeavour to meet identified needs through sustainable development patterns.

Identifying and Assessing Sites

The Duchy welcomes the Council's ongoing Land Availability Assessment work and the creation of a formal assessment methodology. The process should be transparent, objective, and evidence-led, ensuring sites are evaluated consistently against clearly defined criteria. This is particularly vital given that NPPF Policy PM9 requires an assessment of site availability, suitability, achievability, development capacity, and delivery timescales, with the ultimate goal of identifying sites capable of supporting the Plan's emerging vision and spatial strategy.

The Duchy supports the Council's commitment to identifying and evaluating a wide range of sites throughout the Local Plan process. Thorough analysis will be required to determine the employment land needed to support the Borough's economic growth objectives. The NPPF is clear that development plans must be informed by an

assessment of land availability to meet development needs and should include "a thorough site identification process to identify a sufficient range and quantity of potential sites."

The assessment methodology should appropriately weigh various factors, including sustainability, accessibility, infrastructure provision, environmental considerations, deliverability, and viability. National policy places particular emphasis on identifying land that can meet development needs and support sustainable growth patterns. The Local Plan must therefore ensure that assessment criteria do not assign disproportionate weight to individual constraints without also considering the broader benefits and opportunities that sites might offer in contributing to housing delivery, economic growth, environmental enhancement, and infrastructure investment.

Employment and Economy

The Duchy welcomes the Council's approach to economic strategy, which is clearly aligned with the objectives of the revised NPPF. The NPPF places significant emphasis on a genuinely plan-led system that prioritises sustainable economic growth and requires local authorities to proactively facilitate business expansion. The Duchy supports the Council in utilising this Local Plan to set an ambitious, positive framework that anticipates the needs of modern industry rather than merely reacting to them.

Given that historical job growth in the borough has significantly outstripped original target (1.3% annually compared to the initial 0.7% projection) it is evident that conservative land supply assumptions could constrain future economic growth. The Duchy urges the Council to adopt a more expansive approach to land allocation. To ensure long-term prosperity, the new Local Plan should designate a larger amount of employment land, ensuring that sufficient, high-quality, and well-connected sites are available to accommodate the continued upward trajectory of the Cheshire East economy.

As a major landowner and key stakeholder, the Duchy is committed to supporting this economic vision by bringing forward deliverable, sustainable development opportunities. An evidence-based assessment should be undertaken that recognises the strategic potential of land currently being promoted for employment-led development, and focus on how well-located sites can actively drive economic, social, and environmental gains.

Conclusions and Summary

The Duchy welcomes the opportunity to respond to the Cheshire East Local Plan Review Scoping Consultation and supports the Council's commitment to preparing a new Local Plan, which is a necessary step to address the borough's evolving needs within a changing national policy landscape.

These representations highlight that the new Local Plan must be fundamentally ambitious. Given that the borough's historical job growth has significantly outperformed original projections, the Council must adopt an expansive approach to land allocation. To sustain this economic vitality and avoid constraining growth the Plan must designate a higher quantum of employment land. This approach should be supported by a robust assessment of land availability that moves beyond identifying constraints and proactively captures strategic development opportunities.

The Duchy remains committed to engaging with the Council throughout this process to assist in shaping a deliverable, long-term strategy that secures prosperity for the communities and businesses of Cheshire East.

I trust these representations will be fully considered in the plan making process and would welcome further engagement with the Planning Policy team ahead of the next plan making stage.

CBRE

Yours sincerely



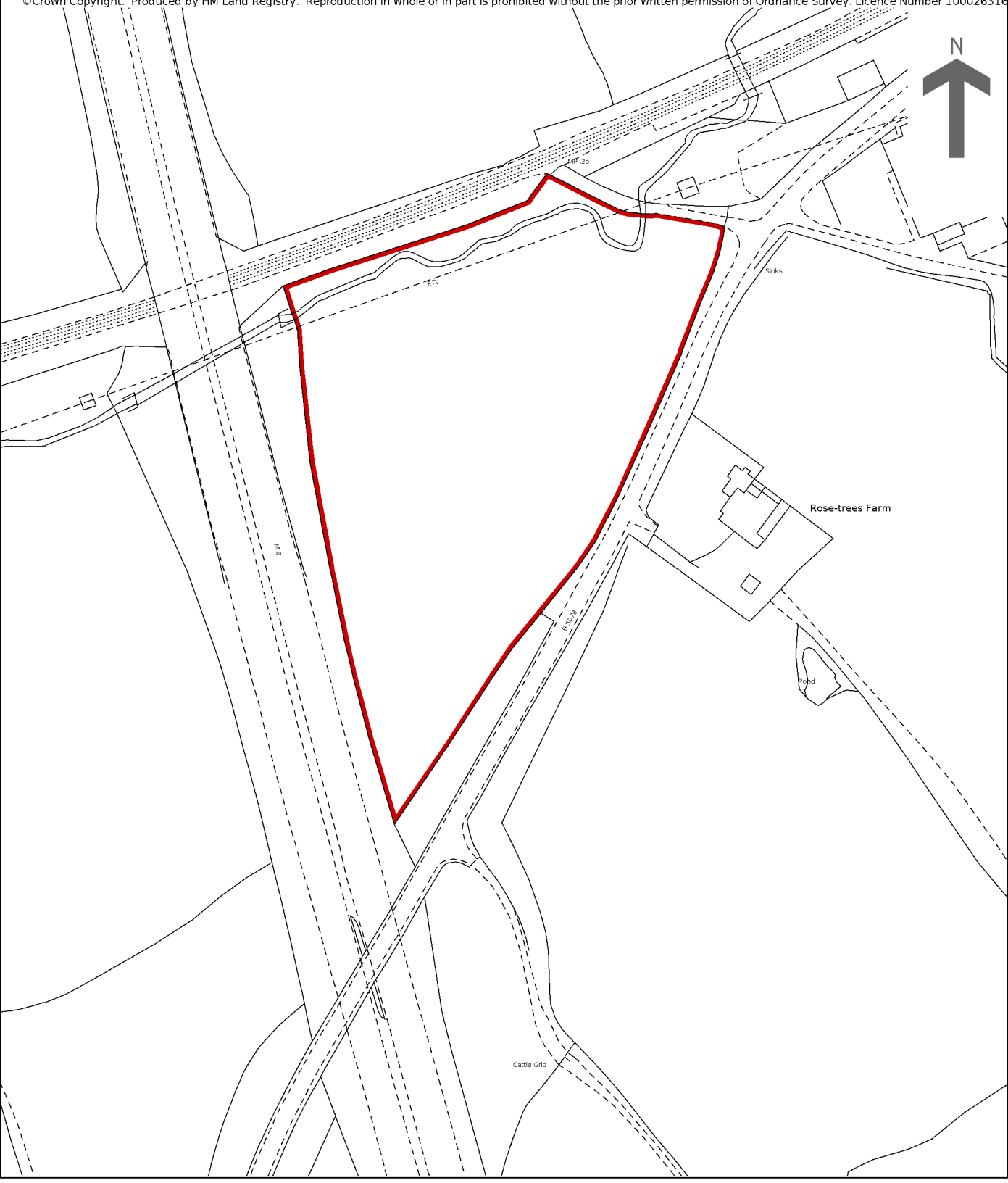
Hannah Blunstone
Senior Director - Planning & Development

Enclosure A – Site Location Plans

HM Land Registry
Current title plan

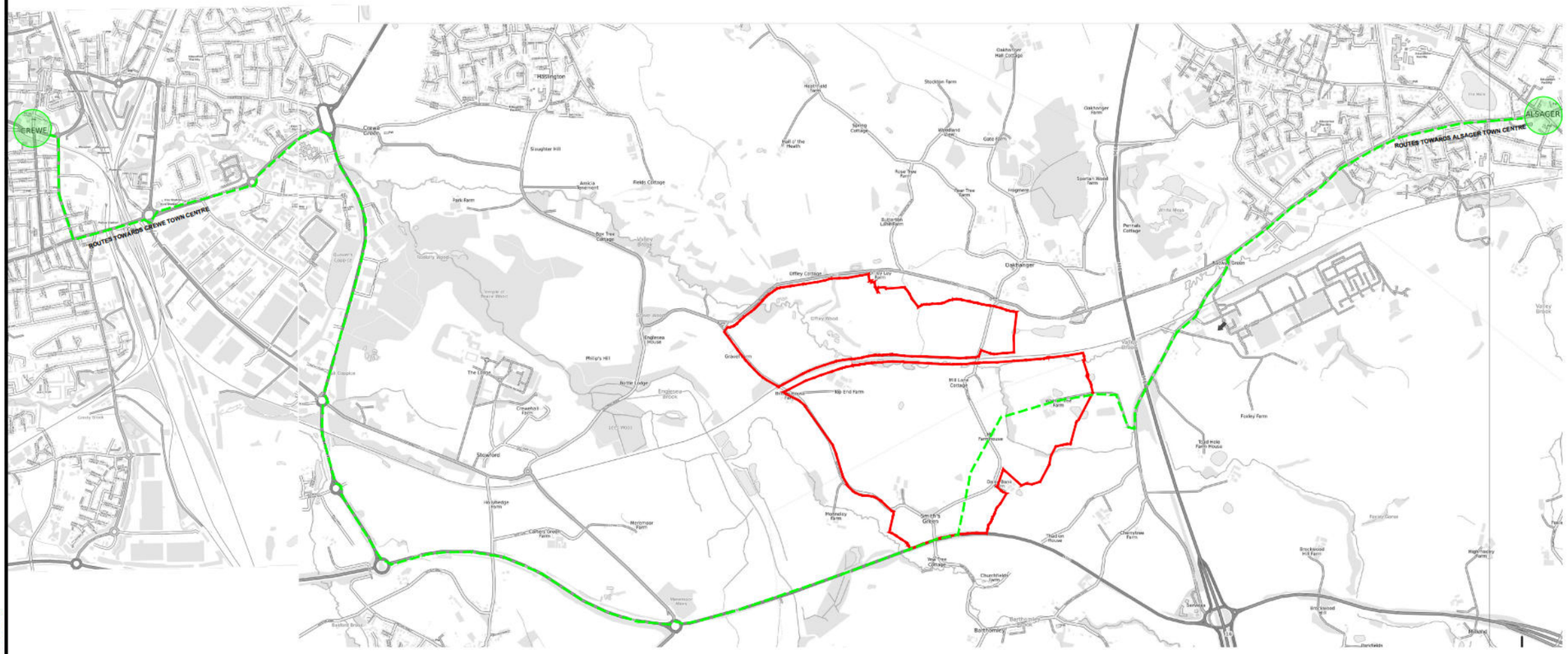
Title number **CH601800**
Ordnance Survey map reference **SJ7754SW**
Scale **1:2500**
Administrative area **Cheshire East**

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This title is dealt with by HM Land Registry, Birkenhead Office.



NOTES

SITE LOCATION

POTENTIAL BUS ROUTE FROM CREWE TOWN CENTRE TO ALSAGER TOWN CENTRE VIA THE SITE

REV	DETAILS	DRAWN	CHECKED	DATE
-	-	-	-	-

CLIENT:

DUCHY OF LANCASTER

PROJECT:

NEW SETTLEMENT AT SMITHS GREEN

DRAWING TITLE:

POTENTIAL BUS ROUTE PLAN

SCALES:

NTS @ A3

DRAWN:	CHECKED:	DATE:
LB	PJW	MAR 26

BTG Eddisons
340 Deansgate
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M3 4LY

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DRAWING NUMBER:	REVISION:
5214-01	-

BTG Eddisons

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