Cheshire East Council Local Scoping Document (July 2026)

Representations by Story Homes

September 2026

PINNACLE

PINNACLE PLANNING LIMITED

Contents

1.	Introduction	1
2.	Housing	3
3.	Settlement Hierarchy	5
4.	Spatial Strategy and Settlement Distribution	7
5.	Identifying Sites/Evidence Base	12
6.	Green Belt	13
7.	Green Gap	14
8.	Design	15
9.	Housing Mix	16
10.	Housing Standards	17
11.	Climate Change Adaptations	18
12.	Engagement	19

Client
Story Homes

September 2026

1. Introduction

1.1 This representation is prepared by Pinnacle Planning on behalf of our client Story Homes Limited (hereafter referred to as "Story Homes"). It provides representations to Cheshire East Council (CEC) in respect of the Local Plan Scoping Consultation (SC) and promotes land south of Chelford Road, Alderley Edge and land west of Rope Lane, Crewe for residential development.

Executive Summary

- Housing: The new Local Plan should set a clear minimum housing requirement, using the standard method as the starting point and testing whether an uplift is needed to reflect economic growth, infrastructure investment and unmet needs.

- Settlement Hierarchy: A comprehensive review of the hierarchy is required. Settlements such as Alderley Edge with its level of services, employment role and sustainability credentials supporting consideration of its elevation from Local Service Centre to Key Service Centre.

- Spatial Strategy and Settlement Distribution: Growth should be distributed through a plan-led, evidence-based approach which addresses current under-delivery, recognises the needs of Local Service Centres and secures a fairer balance between northern and southern Cheshire East

- Identifying Sites/Evidence Base: The Local Plan must be underpinned by robust SHLAA, SHENA and viability evidence which transparently tests site suitability, deliverability, constraints and the ability to provide affordable housing and infrastructure.

- Green Belt: A Green Belt and grey belt assessment is needed to identify sustainable release opportunities, particularly where land does not strongly contribute to Green Belt purposes and can help meet housing needs.

- Design: Design policy should await national guidance and avoid overly prescriptive or borough-wide requirements that could undermine flexibility, viability or site-specific placemaking.

- Housing Mix: Housing mix policy should remain flexible and responsive to updated evidence, market conditions and the differing needs of individual settlements.

- Housing Standards: Local standards should not duplicate or exceed national requirements unless justified by robust evidence and viability testing.

- Climate Change Adaptations: National Building Regulations, the Future Homes Standard and NPPF policies already provide the appropriate framework for low-carbon homes, and local policy should avoid unnecessary duplication or higher untested requirements.

- Engagement: Early, proactive and direct engagement with landowners, promoters and developers is essential to ensure site allocations are realistic, deliverable and supported by credible trajectories.

Story Homes

1.2 Story Homes is a family-owned housebuilder. For over 30 years, Story Homes has been the name most often associated with aspirational houses for sale throughout the North West, and it has rapidly expanded across the whole of the North of England. A passion for quality and excellence has seen Story Homes become a multi award winning UK property developer; with modern and attractive homes instantly inspiring buyers.

1.3 Story Homes' success is underpinned by a determination to understand the needs of communities where they build and a goal to deliver design quality and high-quality building specifications that enhance locations.

New Local Plan

1.4 The current adopted Local Plan for Cheshire East comprises the following documents:

- The Local Plan Strategy (adopted July 2017) (LPS);
- The Site Allocations and Development Policies Document (adopted December 2022) (SADPD);

1.5 CEC are in the process of preparing a new Local Plan under the government's recently reformed plan-making system. CEC issued a Notice to Commence Plan-making on 12 June 2026 and this is the first stage of consultation on the scope of the new Local Plan. Prior to starting work on the new plan, CEC carried out some informal background work including initial work on the evidence base, consultation on Issues Papers in 2024, and invitations to submit sites for consideration in 2024 and 2026.

1.6 The Scoping Consultation document sets out, at a very high level, CEC's approach to the key issues and topics which will shape Cheshire East over the plan period. It is seeking the views of residents and stakeholders on what the new Local Plan should contain and how future consultation and engagement should be carried out.

Representations

1.7 *[Redacted]*

1.8

1.9

2. Housing

2.1 The section on "Housing" is included within chapter 5 of the Scoping Document and refers to meeting the needs of different types of housing. However, this section does not include reference to the fact that the Local Plan will need to include a policy with a housing requirement which identifies the overall number of new homes required over the plan period.

2.2 The boxed text at Chapter 4 of the NPPF 2026, titled "achieving sustainable development", is clear that *"the objective of the policies in this chapter is to meet development needs through sustainable patterns of development".*

2.3 Policy S1 is titled positive plan-making and states that *"the development plan should plan positively for future growth and change by seeking to meet the development needs of their area, as a minimum".*

2.4 Chapter 6 of the NPPF is titled "delivering a sufficient supply of homes" and the boxed text states the following (emphasis added):

"The objective of the policies in this chapter is to support the delivery of a substantial increase in the supply of homes and traveller sites, by ensuring that a sufficient amount and variety of land can come forward where needed. This includes planning for an appropriate mix of accommodation for the local community and ensuring that land with permission is developed without unnecessary delay."

2.5 A Written Ministerial Statement by the Minister of State for Housing and Planning[1] was made in December 2024 on the same day that the previous NPPF was published, noting from the outset that *"this Government has inherited an acute and entrenched housing crisis".* The same adjectives were used within the Ministerial Statement accompanying the December 2025 proposed planning reforms.

2.6 NPPF Policy HO1 is titled "assessing the need for homes" and states that *"the preparation of spatial development strategies, and local plans where a spatial development strategy is not in place, should be based upon a housing need assessment that establishes the overall number of homes needed in the area as a minimum over the plan period, using the standard method"*.

2.7 It is clear therefore that the need figure generated by the standard methodology should be considered as the 'minimum' starting point in establishing a requirement for the purposes of plan production.

2.8 However, there are circumstances whereby a higher figure could be adopted over and above the standard method. NPPF Policy HO2 is titled "setting requirement figures for homes" and states (emphasis added):

[1] Building the Homes We Need (12 December 2024)

"3. Housing requirement figures should:

a. Reflect the extent to which the identified needs of the area can be accommodated over the plan period as a minimum, in accordance with policy S1; and

b. Be higher than the overall figure identified in the local housing needs assessment where appropriate. This includes situations where a higher housing requirement is necessary to meet the needs of neighbouring areas, or to reflect growth ambitions linked to economic development or infrastructure investment."

2.9 The new Local Plan should identify that the Standard Method figure of 2,530 dpa as the just the 'starting point' (representing a 41% increase over the existing Local Plan requirement and a 159% increase over the pre-December 2024 standard method figure) with the potential for an uplift which reflects growth ambitions linked to economic development or infrastructure investment (Policy HO2 of the NPPF). Cheshire East should fully examine whether there is a need for an uplift based on the need to align jobs growth with the delivery of new homes, as well as potentially address unmet need from neighbouring areas. All of these aspects should be explored thoroughly through the Council's evidence base, notwithstanding the SDS process which will shortly be underway with the Combined Authority.

2.10 It should be made clear that the Local Plan housing requirement is expressed as a minimum and should be included within a policy.

2.11 The housing requirement should not be artificially constrained by policy designations, and a substantial buffer should be incorporated to the housing supply trajectory to avoid potential non-delivery. This will provide flexibility in the supply and improve the prospect of achieving the identified quantitative and qualitative needs for housing.

2.12 The Plan should maintain a deliverable pipeline of sites throughout the plan period, and this is particularly important given the acknowledged housing land supply issues at present.

2.13 Policy HO2 of the NPPF also refers to Neighbourhood Planning and states that *"a housing requirement figure should also be set for designated neighbourhood plan areas*" and *"should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority".*

2.14 There is a significant issue regarding affordability of housing in Alderley Edge with the average house price well above both the CEC and LSC average. This is a severe problem for both first time buyers and those wishing to downsize. Further evidence on this is provided within our representations on Spatial Strategy and Settlement Distribution

2.15 Story Homes would support the identification of a housing requirement for Alderley Edge, which takes account of need and local characteristics, including sustainability and lack of affordability. Further details on this are included in our response to the sections on Settlement Hierarchy and Spatial Distribution.

3. Settlement Hierarchy

3.1 Story Homes supports a comprehensive review of the settlement hierarchy for the new Local Plan.

3.2 The settlement hierarchy in the adopted Local Plan was informed by the 'Determining the Settlement Hierarchy' report produced in 2010. This is now well over sixteen years old. Paragraph 2.19 of the Settlement Hierarchy (draft methodology previously prepared by CEC) document confirmed that the levels in the hierarchy were taken from the then North West Regional Spatial Strategy (RSS), which proposed that development should be tiered in a settlement hierarchy consisting of towns of regional significance (including Crewe and Macclesfield), KSCs and LSCs. This document was adopted in September 2008, and the length of time since its adoption justifies a review of the entire approach.

3.3 The Table at Appendix 10 of the 2010 Report shows how each settlement within the top three tiers scores against each determining factor and marking each factor as being applicable to a KSC, LSC or Primary Town. Story Homes notes that Alderley Edge was the highest performing LSC in 2010, with three of the five determining factors being applicable to a KSC. The two remaining factors, Population and Employment, were applicable to LSC's. No other LSC's were attributed three KSC scores, and only one LSC was attributed two KSC scores. The remaining eleven 11 LSC's were attributed one or no KSC scores.

3.4 Alderley Edge also appears in Table 8.1 of the 2010 assessment which provides "Retail Information for Principal Towns/Key Service Centres". At that time Alderley Edge had a total of 96 retail units and was included in the Table, despite not being a Principal Town or a KSC. It is also notable that Alderley Edge had more retail units than Handforth which was a KSC (79 retail units at the time of the assessment).

3.5 A document titled Spatial Distribution Update Report was prepared for CEC by Aecom in 2015 in order to support the approach to distributing development as part of the adopted Local Plan. The Alderley Edge Settlement Profile confirms that Alderley Edge had the highest local employment of all the LSC's at 3,300 employment opportunities and is well above the median for LSC's at 1,100. This high level of employment opportunity is also reflected in the net commuting information from the 2011 census that establishes a net inflow of 500 employees to employment opportunities in Alderley Edge. Paragraph 5.4.8 of the Report also confirms that *"Prestbury and Alderley Edge (two other settlements where home-based working is also particularly prevalent) are unusual in having net in-commuting for work, primarily from the Principal Town of Macclesfield."*

3.6 It is notable that since this data was collated, Select Property and Vita Group relocated their Head Office to Horseshoe Farm, Alderley Edge in 2013, with further expansion approved in 2018. It is clear that Alderley Edge serves as an employment hub well beyond that which is anticipated at the LSC tier and is more aligned with the KSC tier.

3.7 If settlements are borderline between two tiers, an additional framework of weighting could be introduced towards certain factors; e.g. key indicators of sustainability such as the presence of services and facilities and accessibility may be considered more important.

3.8 Paragraph 7.5 of the 2010 Settlement Hierarchy Assessment concluded that Alderley Edge is a borderline settlement that could have been classed as a Key Service Centre:

"*The remaining three candidate settlements produced a 3 to 2 mixture of results for the factors used to determine their role and function i.e. Alderley Edge, Disley and Holmes Chapel. This indicates that they are borderline in terms of their position as either a Key or Local Service Centre within the hierarchy. All have the potential to be Key Service Centres, particularly Alderley Edge which had a majority of factors indicating its role as a Key Service Centre. However, it has been decided to make a judgement about how these three settlements currently function overall. While it was decided that on balance these settlements all currently function as Local Service Centres, their future position in the hierarchy should be kept under review…"*

3.9 Alderley Edge is clearly a highly sustainable settlement and is capable of moving up to the KSC tier. This is as a result of the greater number of employment opportunities available in Alderley Edge since the most recent CEC assessment in 2010. Given there has been no review of the settlement hierarchy since the report in 2010 it is critical that CEC grapple with this issue early in the Local Plan preparation process to ensure the spatial strategy for growth is sustainable and reflective of need.

4. Spatial Strategy and Settlement Distribution

4.1 Story Homes has concerns that that the intention to set the beginning of the plan period at the point of adoption (2029), would ignore the current unmet need that is accruing within CEC. As such, Story Homes considers that the start date for the plan period should be brought forward to seek to meet some of this existing shortfall. This should, as a minimum, be from the start of the preparation of the new Local Plan (2026) but consideration could be given to an earlier date. This would mean planning for a period of eighteen years rather than fifteen.

Principal Towns

4.2 Story Homes recognises the role of Principal Towns and agrees that Crewe and Macclesfield are the most sustainable settlements in the Borough. It therefore follows that the highest proportion of development should be directed to the top tier of the hierarchy.

4.3 It is noted that Crewe is in close proximity to Nantwich, Haslington, Shavington, Willaston, Sandbach and Alsager, and crucially, is not significantly constrained by Green Belt. Of further importance is the relationship between Crewe and the City of Stoke on Trent, approximately 10 miles to the south east, along the A500. A shared Investment Zone known as the Constellation Partnership aimed to deliver 120,000 new jobs and 100,000 new homes by 2040. This was to be achieved through closer working between the relevant authorities and improved connectivity.

4.4 Crewe is clearly a logical area for growth and can continue to support the delivery of the highest proportion of new homes.

4.5 The availability of sites in Crewe will need to be reviewed as part of the Local Plan preparation process, and Story Homes is of the view that this should be supported by a review of the Strategic Green Gap designation boundaries (adopted Policies PG5 and PG12). We discuss this more at Section 7 of this representation.

4.6 The adopted Local Pan Strategy allocated land totalling 5,145 dwellings in and around Crewe. Around 2,720 dwellings were directed to the south of Crewe, 2,025 to the north and 400 to the centre. This split reflected the fact that the key road and rail connections are located to the south of the town and that these links are crucial to economic growth and further joint working with the Potteries authorities. Story Homes is of the view that it would be too simplistic to ignore opportunities for further development to the south of Crewe and the economic benefits this could have, largely due to the Strategic Green Gap designation.

4.7 Crewe is restricted to the north west by the A530 and any future growth in this direction would need to overcome issues around separation and accessibility to existing services with residents having to cross this major arterial route. The presence of railway lines to the north of Crewe has historically created connectivity challenges, with reduced highway capacity, due to the need to cross these routes. A review of the Green Gap around Crewe is therefore required as development locations to the south of the town are likely to be required.

Local Service Centres

4.8 Story Homes is of the opinion that the distribution of growth across the Borough should include the identification of housing needs for each Local Service Centre (LSC). The adopted Local Plan identified a figure of 3,500 new homes to be designated to LSC's and that this was to be disaggregated at the SADPD stage. Whilst the Local Plan Strategy does not identify a preferred spatial strategy for distribution amongst the thirteen settlements, it did establish a vision for LSC's, which states:

"In the Local Service Centres, some modest growth in housing and employment will have taken place to meet locally arising needs and priorities, to reduce the level of out-commuting and to secure their continuing vitality. This may require small scale alterations to the Green Belt in some circumstances."

4.9 However, by the time the Submission Version of the SADPD was published, a separate paper entitled 'The provision of housing and employment land and the approach to spatial distribution (2021)' confirmed that CEC considered that housing allocations were not necessary at the LSC tier of the settlement hierarchy.

4.10 The SADPD Inspector's Report (2022) confirms at paragraph 55:

"…91% (3,210 dwellings) of the indicative figure of 3,500 dwellings for the LSCs has been met through completions and planning permissions on windfall sites between 2010 and 2020… It is the case that a significant proportion of this was granted in the period up to March 2016, when the Council was unable to demonstrate a 5 year housing land supply and sites outside of settlement boundaries were permitted."

4.11 It is therefore clear that this result was largely due the steady erosion of the 3,500 dwellings figure for LSC's, via granted applications and allowed appeals over first ten years of a twenty-year plan period. This was not a sustainable approach and failed to take a strategic view on the development needs across the Borough.

4.12 The implication was that very few residential allocations were made in the LSC's, which have so far failed to deliver the required number of houses when compared with other tiers. The unintended consequences of the SADPD approach are impacting the LSC tier, including increased house prices and worsening affordability as a result of unmet demand within these specific market areas. LSC's should be a priority area for any future Local Plan to ensure that these issues can be addressed and service the needs of existing residents and contribute to the sustainable growth of the wider Borough.

4.13 The most recent Housing Needs evidence is from 2015 and is therefore expected to be updated during the preparation of the Local Plan. Whilst CEC has not published a SHMA since 2013, Table 4.14 within that document provided the net annual affordable housing requirement for each sub-area for the period 2013/14 – 2017/18. The Mobberley, Chelford and Alderley Edge Sub Area had the fifth highest affordable need behind Crewe, Macclesfield, Poynton and Sandbach. When reviewing this data as a percentage of the number of households[2], the Mobberley, Chelford and Alderley Edge Sub Area had the fifth highest rate of households in affordable housing need – 1.72%. Given the continuous

[2] Table 4.3 of the SHMA 2013, column titled 'Base'

rise in house prices in Alderley Edge and the growing national cost of living crisis, it is expected that this situation has worsened since 2013.

4.14 As noted in our response on Settlement Hierarchy, the document titled Spatial Distribution Update Report was prepared for CEC by Aecom in 2015 in order to support the approach to distributing development as part of the adopted Local Plan. The settlement profile for Alderley Edge notes that in December 2014 there were 124 housing register applications, which the report highlights is significantly higher than all other LSCs and well above the median, which is only 25.

4.15 Cheshire East commissioned the Alderley Edge Parish Housing Needs Report (AEPHNR), which was produced in 2023 and collected up-to-date information from local residents on housing needs. The Report shows that housing register applications had increased to 268 households having selected Alderley Edge as an area of choice by September 2022, which represents a 116% increase in less than 10 years.

4.16 An application for new housing at Heyes Lane, Alderley Edge was supported by an Affordable Housing Statement prepared by Resolve106. This document analysed the AEPHNR and identified the following conclusions:

- The ratio of median house prices to median income in Alderley Edge is 11.77 compared to 7.39 for Cheshire East and the average for England of 8.28.
- The ratio of lower quartile house prices to lower quartile income is 13.72 for Alderley Edge compared to 7.08 for Cheshire East and 7.36 for England.
- The median income in Alderley Edge is some 30% higher than that for Cheshire East as a whole, and on this basis the affordability ratio for Alderley Edge would compare with the least affordable 25% of London Boroughs.
- According to deal book data held by estate agent Savills in relation to their local office, 53% of all purchasers buying in Alderley Edge in the past 12 months moved into the area from outside of Cheshire.

4.17 The lack of allocations in Alderley Edge through the adopted Local Plan will have exacerbated the affordable housing need in the area and should be rectified as part of an emerging Local Plan. This is noted in the AEPHNR which confirms that just 38 new market homes with planning permission remained to be built at that time and none of those sites included provision of affordable housing. The Report states a shortfall of 254 affordable homes in Alderley Edge at that time. The Golden Rules within the NPPF will mean that 50% of all Green Belt allocations will be delivered as affordable housing.

4.18 The Aecom Report also highlighted that the age structure within Alderley Edge, at the time in 2015, was severely unbalanced with 24.3% of the population aged 65 or over, which is considerably higher than the UK average of 17.4%, and the Cheshire East average of 20.9%. Furthermore, the proportion of the population that is over 85 (5.5% was nearly double the median figure for CEC.

4.19 This should be seen in the context of a worsening situation with a steeper than average decrease in the working age population between 2001 and 2011.

4.20 The proportion of residents over the age of 65 provides a strong indicator of the degree of age balance within the local population structure. A younger population is likely to be more economically active, helping to support the local economy. A population with a higher proportion of older people presents a risk of future population decline without an influx of new, younger residents. New family housing is therefore required to help bring population structures back into balance with the UK average. It is also clear that specialist housing will be required to address the needs of increasing elderly population.

4.21 The LSC's vary widely in the number of available services and amenities, including access to public transport and spatial form. The distribution of growth within the LSC tier will need to ensure that the most sustainable and suitable settlement will be allocated sites appropriate to their size.

4.22 Story Homes therefore considers that an assessment of housing need at the LSC scale is needed to determine the most appropriate location for growth. Story Homes regards that an assessment of each settlement, its performance economically, socially and environmentally would allow CEC to calculate how much growth would need to be accommodated within each LSC. A review of technical constraints such as flooding and topography would also enable the physical capacity of each settlement to be determined requiring a review of the settlements in close proximity which may be able to accommodate any additional housing need.

4.23 In this regard, CEC will need to consider land constraints to development at Local Service Centres. Goostrey, for example cannot accommodate growth due to its proximity to Jodrell Bank. Additionally, the proximity of Mobberley to Manchester Airport, and the resultant noise issues potentially affecting the amenity of new residents, challenges the sustainability of locating new housing within the settlement. Story Homes is also of the view that Prestbury is heavily constrained by the Area of County Value landscape designation which virtually surrounds the settlement. Furthermore, there are concerns as to whether Bollington can accommodate additional housing due to the challenging topography around the village, resulting in a lack of available sites.

4.24 If this structured and strategic approach is not carried out, and the allocation of inappropriate sites in areas of lesser need occurs, much needed housing development will not be provided, ultimately increasing the existing pressures placed on LSC's. This could result in an increase in unplanned delivery, which is not managed. Fundamentally, a non-strategic approach would conflict with the NPPF objectives to ensure that policies are positively prepared and therefore policies will be inconsistent with the aims of delivering sustainable development.

4.25 This approach is consistent with the new NPPF which requires a housing requirement figure to be set for designated neighbourhood plan areas though Policy HO2 and this *"should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority"*.

4.26 Limiting the ability of settlements to remain viable, vibrant and affordable (to all demographics) is a situation of specific concern for those LSC's within the north of the Borough that have been constrained by Green Belt for several decades.

4.27 Story Homes are of the opinion that a future Local Plan must redress the adopted uneven spatial distribution of growth between northern and southern Local Service Centres. A new Local Plan must allocate a greater proportion of housing sites in the north of the Borough, where Green Belt is a constraint to development, to fully meet qualitative and quantitative needs of the Borough. It is recommended that the emerging Local Plan seeks to identify a sustainable housing figure for each LSC. Restricting development and guiding it to non-Green Belt settlements where the need may not be as great, or has arguably been met, will fail to rebalance the housing market and achieve sustainable development creating a North Cheshire and South Cheshire divide. The requirement to meet the Golden Rules, particularly the delivery of 50% affordable housing further enhances the case for Green Belt allocations in the north of the Borough where good levels of viability can sustain this delivery.

4.28 Story considers it critical that CEC now adopt a plan led approach to growth and recognise the importance of fairly distributing growth to all LSC's, particularly those in the North Cheshire Green Belt.

4.29 Alderley Edge is, at present, a very sustainable and appropriate location to deliver housing growth. It has a very well-equipped local centre, including a wide range of shops and community facilities, excellent public transport services and high-quality open space provision. Furthermore, it has the most successful local economy of any LSC and is well located to capitalise on future growth being on the periphery of the Manchester City Region.

5. Identifying Sites/Evidence Base

5.1 Story Homes considers it imperative that a robust SHLAA and SHENA are prepared by the Authority to inform an emerging Local Plan and comprise key evidence base documents. This work can inform the spatial strategy for growth, including the housing requirement figure for the different market areas.

5.2 The SHLAA must consider environmental and historic land-based designations as well as technical constraints including ground conditions and areas of flood risk, using available information. Story Homes also considers that a review of existing allocations and designations in the adopted Local Plan must inform the SHLAA site assessment process.

5.3 The PPG provides guidance (paragraph: 018 Reference ID: 3-018-20190722) on assessing the suitability of sites and highlights the following factors for consideration:

- Appropriateness and likely market attractiveness for the type of development proposed;
- Contribution to regeneration priority areas;
- Environmental/amenity impacts experienced by would be occupiers and neighbouring areas.

5.4 A Viability Assessment should also feed into the site assessment to ensure allocated sites have been rigorously tested and there is a clear understanding of which areas/sites are viably able to provide affordable housing and financial contributions.

5.5 The methodology for the site assessment should be the subject of consultation and the results for sites put forward as part of the Call for Sites clearly evidenced.

5.6 In preparing a new SHLAA the authority should carefully consider the site review methodology. The SHLAA should clearly identify sites that can deliver new market and affordable housing in the short term and distinguish these from those sites that are potentially constrained by viability, technical constraints or ownership issues.

5.7 The new assessments must take account of the previous failings and ensure a robust evidence base supports the new Local Plan for the most effective delivery.

5.8 The emerging Local Plan can help to ensure that developments are viable and are not prevented from coming forward due to planning policy requirements by ensuring that there is flexibility for viability to be considered further at the application stage. In line with the PPG, this provides an opportunity to reconsider viability on a site-by-site basis where "particular circumstances" may merit a review of policy expectations. Where individual developments propose a departure from the requirements set out in local policy, CEC can request developers to provide site-specific viability appraisals to demonstrate why such requirements cannot be met, as per existing policies within the adopted Local Plan.

6. Green Belt

6.1 Story Homes agrees that it is necessary for CEC to undertake a Green Belt Assessment to inform the preparation of a new Local Plan.

6.2 The Green Belt has largely restricted development within the northern Cheshire settlements since its submission to the Ministry of Housing and Local Government in 1961. As a result, there has been limited growth within the north of the Borough, despite the abundance of services and facilities, and property values within these areas have increased dramatically. Green Belt realignment is required to ensure that this situation does not continue, and housing is developed in areas where it is needed.

6.3 There is reference in the SC to the recent changes to national policy regarding Green Belt review and the introduction of "grey belt" land. This has now been overtaken by the publication of the new NPPF, which notes at Policy GB4(1)(d)(i) that when defining Green Belt boundaries, grey belt should be considered before other Green Belt locations.

6.4 Story Homes considers it appropriate for the emerging Local Plan to include a policy acknowledging evidenced grey belt sites as a possible source of land supply, subject to satisfying the requirements of the NPPF and the 'Golden Rules'.

6.5 CEC must undertake a Grey Belt land assessment, which should include a transparent methodology, acknowledging NPPF Annex E, the PPG and the need to consider each site specifically, not the performance of the wider Green Belt parcel (Paragraph: 009 Reference ID: 64-009-20250225). Given that LPA's are required to identify areas of grey belt, it is important that sufficient consideration is given to the size and composition of parcels within the assessment to ensure that deliverable opportunities are not missed. A finer grain of assessment may be required, to avoid characterising large swathes of land as making a strong contribution to Green Belt purposes. This was a point which was noted by the Inspector who examined the CEC Local Plan Strategy over ten years ago.

6.6 As noted throughout this submission, Story Homes are actively promoting land at Ryleys Farm in Alderley Edge, this site is considered to comprise Grey Belt land.

7. Green Gap

7.1 The Scoping Consultation Document acknowledges that the Council will need to set out through Local Plan policies and provide evidence to consider the role and function of the current strategic green gap and how it could function in the future.

7.2 Story Homes is of the opinion that allocations within the Strategic Green Gap should not be ruled out based on principle. Story Homes supports the preparation of a Strategic Gap Review which seeks to understand which areas make the least contribution to the aims of the Gap. Story Homes is of the view that certain parcels can be developed without significant impacts on the overall objectives and purposes of the designation whilst also ensuring defensible and permanent boundaries are created to prevent future development.

7.3 Story Homes considers it is possible for parcels within these gaps to be allocated for residential development to meet local needs, ensure the sustainable growth of Crewe (i.e. not focussed to the north) and stipulate that the delivery of these sites must create a defensible boundary and landscape buffer to enhance the open countryside being retained.

7.4 LPS Policy PG5 identifies the purposes of the Strategic Green Gaps, which are principally centred around preventing coalescence; retaining the existing settlement pattern; and protecting the setting and separate identity of settlements. Whilst several areas of the Strategic Green Gap appear to serve these purposes when viewed on a map, the experience at ground level is very different. There are areas that are almost surrounded by the rear gardens of properties facing on to roads with very little intervisibility, landscape value or even public accessibility to these Gaps. Any future review of the Green Gaps should consider the experience of people who live and travel around the area and the roles the designation performs, rather than based on a 2D plan. The contribution to the way in which these gaps are experienced on the ground and how this relates to the stated purposes, including the resultant harm from any development, should therefore be a factor.

7.5 Story Homes is of the opinion that the designation needs to be reviewed to ensure the Gaps are effectively managed, serve a landscape purpose and are of benefit to local residents.

7.6 The site promoted by Story Homes (SHLAA Ref: 4152) lies within the Green Gap between Crewe and Willaston; the site is relatively flat, adjoining residential properties to the north east and east, the railway line to the south and other areas of Green Gap to the west, and south. The opportunity for the site to be viewed from public spaces is limited and there is already a tree lined boundary to the west. The Strategic Green Gap in this location therefore contributes very little to the Purposes included within Policy PG5 and isn't justified. There is an opportunity to allocate this site for residential development alongside extensive areas of open space to provide a sufficient landscape buffer. This will ensure the space is accessible to existing and proposed residents while also protecting the area from further development in the future.

8. Design

8.1 The Scoping Consultation Document acknowledges that creating well-designed, sustainable places is a central objective of the planning system, with national policy placing increasing emphasis on design quality as a key component of sustainable development.

8.2 It also notes that there is an incoming Design and Placemaking PPG and model design codes expected from the Government. Story Homes consider that it could be premature of the LPA to include a borough-wide design code as a supplementary plan or adopting a strategic design framework within the Local Plan at this stage as it is likely this will need to be revised when the National level policy is released.

8.3 The national guidance should be awaited to avoid duplication. Any local level or site-specific design coding should be carefully considered to ensure flexibility and viability. Such design codes should be subject to stakeholder consultation to ensure they are commercially deliverable and do not hinder the ability of a site to come forward for development.

8.4 The Council should avoid overly detailed policies, as the specific design of a site will need to be informed by an individual analysis of its constraints and opportunities. Equally, a 'one size fits all' approach to design would not benefit CEC as a Borough with a variety of nuanced settlements.

9. Housing Mix

9.1 National policy requires local plans to provide a mix of housing that reflects current and future needs, including different sizes, types and tenures. Current local plan policies require a range of house types, sizes and tenures, with evidence showing the greatest need for market housing is three-bedroom homes, whilst demand for affordable housing is strongest for two-bedroom properties. Updated evidence is being prepared through a Housing Needs Assessment, which will identify the housing requirements of families, older people, smaller households, people with disabilities and those needing affordable housing.

9.2 It is important to build in flexibility to a housing mix policy, given that evidence is timestamped and therefore there will be changes and fluctuations. In addition, the evidence must consider individual settlements. Not all KSCs or LSCs are the same, as has been highlighted throughout our responses.

9.3 Any policy relating to housing mix must be flexible to respond to changing market conditions.

10. Housing Standards

10.1 The Scoping Consultation Document notes that national planning policy allows local planning authorities to require higher standards for new homes through local plan policies, however this must be supported by robust evidence including a viability assessment

10.2 Story Homes considers that the standards set at the national level are sufficient to ensure the deliverability of high-quality, sustainable homes. There is no need for duplication or for local standards to go beyond those prescribed nationally. There is no need to replicate the standards required by Building Regulations in the Local Plan, nor is there any local justification to increase the standards over and above these.

11. Climate Change Adaptations

11.1 Part L Building Regulations and the Future Homes Standard (FHS) set the energy efficiency and carbon reduction rules for new buildings in England. Published in March 2026, the updated regulations come into force on 24 March 2027, requiring new homes to emit at least 75% less carbon than 2013 baselines and run entirely on low-carbon heating.

11.2 These standards are set at a national level and have been found to be suitable, acceptable and sufficient to ensure the delivery of sustainable homes. There is no evidence to suggest that the Local Plan must go beyond these standards.

11.3 These national requirements include for low-carbon hearing (such as air-source or ground-source heat pumps); solar PV is mandatory; enhanced fabric first approach (tightened U-values) and home users guides.

11.4 These standards are set to come into force in March 2027, the development industry has been in transition and preparing for these arrangements, it is unreasonable to expect regional and national housebuilders to pivot to a different set of local standards and continue to deliver at the pace required to enable housing requirements to be met satisfactorily.

11.5 The new NPPF now includes national decision-making policies, including Policy CC2 which relates to the mitigation of climate change. There is no need to replicate the standards required by Building Regulations or the NPPF in the Local Plan, nor is there any local justification to increase the standards over and above these.

12. Engagement

12.1 Story Homes agrees that engagement is an essential part of the consultation process.

12.2 It is evident from our responses to several of the consultation questions that historic under-delivery as part of the previously adopted Local Plan has meant that the Council has fallen behind its housing trajectory.

12.3 Some of the previously allocated strategic sites have been slow to deliver due to site specific constraints, as well as land ownership, market and viability issues that were not fully tested by the previous Local Plan. This situation should be avoided in the new Local Plan via more targeted and proactive engagement with landowners, land promoters and developers.

12.4 It is therefore vital that CEC seek to liaise directly with stakeholders to ensure that when considering and allocating sites that the Local Plan represents realistic and deliverable yields and timescales for delivery. This could comprise formal or informal meetings to discuss options for various sites.

12.5 In addition to the methods proposed in the Consultation document, CEC should consider allocating specific officers to liaise with stakeholders on proposed allocations from an early stage to work collaboratively in identifying site constraints and opportunities. This will ensure that sites allocated in the plan are a true representation of what will be delivered within the plan period allowing for greater confidence in the robustness of the trajectory, particularly at examination stage. Story Homes supports this approach and would welcome the opportunity to meet with Officers directly.