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

28th August 2026

BY EMAIL: **localplan@cheshireeast.gov.uk**

CHESHIRE EAST LOCAL PLAN SCOPING CONSULTATION

REPRESENTATIONS ON BEHALF OF MAC MIC STRATEGIC LAND LTD.

1. These Representations have been prepared by Iceni Projects on behalf of our client, Mac Mic Strategic Land Ltd ('Mac Mic') in response to Cheshire East Council's Local Plan Scoping Consultation which runs until Tuesday 1st September 2026. Mac Mic represent the Waldron's Place Landowner Group.

2. Our client is supportive of the Council's intention to progress with a new Local Plan (under the Government's new plan-making system) which should identify sufficient land for housing and employment to meet the needs of the borough for the next plan period and beyond.

3. Our client has land interests in Coppenhall, Crewe, at 'Waldron's Place' ('the Site'). The Site was submitted as part of the Council's Call for Sites process which ran until 31 March 2026 and is considered to be a strong candidate for a residential-led allocation in the forthcoming Local Plan, as discussed further within these Representations.

4. These Representations have been prepared with regard to Policy PM15 of the newly revised National Planning Policy Framework (NPPF) which sets out the requirement for the Council's New Local Plan to be examined in order to assess whether the Plan has been prepared in accordance with the legal and procedural requirements and can be deemed 'sound'.

5. The tests of soundness are applied at the Local Plan Examination stage. As the Local Plan preparation is in its early stages, the purpose of these Representations are not to test the Local Plan's soundness. Instead, it provides our client's commentary on what the emerging Local Plan should consider, and why Waldron's Place is a suitable candidate for development, in order to aid the ongoing production of a Local Plan, so that it may be ultimately found sound.

Context for the New Local Plan

6. As set out in the Scoping Document, the purpose of the consultation is to enable early engagement in the plan-making process about what the new Local Plan for Cheshire East should contain and how future consultation and engagement should be carried out. The new Local Plan will set out the vision for the future development of the Borough, planning policies and allocate land for future development.

7. We understand that evidence base documents are also in progress, including transport modelling, a Green Belt assessment, a review of the current provision of infrastructure, and

consideration of the potential future needs for housing and economic development. We request to review these documents at the earliest opportunity to provide further commentary on how the Local Plan is informed.

8. The new Local Plan is being prepared under the new plan-making system established by the Town and Country Planning (Local Planning) (England) Regulations 2026. Set within this context, the Council now has a 30-month window to prepare its new Local Plan. Our client welcomes the Council's recognition and commitment to adhere to these new regulations.

9. The Scoping Document also acknowledges that a number of changes have been made to the national planning system which will have significant impacts on how the Council plans for future growth. This includes the Government's requirement for new Local Plans to respond to the recent planning reforms which are intended to increase the delivery of new homes and support economic growth.

Increase in housing requirements

10. Key changes in national policy include the re-introduction of mandatory housing targets, meaning Council's such as Cheshire East now have a higher housing target to achieve. Based on the May 2026 affordability ratios, Cheshire East's housing need under the standard method is 2,530 dwellings per annum (dpa). This is a 41% uplift compared to the current Local Plan Strategy requirement of 1,800dpa, indicating that the Borough will have higher levels of population and household growth over the next plan period, and a need to deliver sufficient homes to accommodate said growth.

11. The Scoping Document acknowledges that the standard method figure is a starting point, and the final housing requirement in the new Plan may be higher. The Council must, therefore, ensure it identifies sufficient sites to accommodate new homes over the next plan period. We, therefore, request that the Council fully examines within its evidence base whether there is a need to increase the Local Housing Need figure to ensure flexibility, so that there is a suitable range of sites to come forward for delivery, which also account for viability constraints, supporting economic growth, potential unmet need from neighbouring areas, and delivery of affordable homes.

12. The Council currently cannot demonstrate a five-year housing land supply (which is currently 3.3 years). National planning policy puts significant weight on the need to boost housing supply, and as set out further below, our client's site in Crewe is a fantastic opportunity to boost the Council's supply, both in the next 1-5 years to contribute to its five-year supply, and beyond.

Grey belt

13. Another key change is the introduction of 'grey belt' land which includes land in the Green Belt that is either previously developed land and/or does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 1 of Policy GB2 of the updated NPPF. Grey belt should be considered first if there is the need to release Green Belt land. As we set out within these representations, while the release of Green Belt and development of grey belt sites will likely be needed over the next plan period to achieve the increased housing requirement, the Council should also look to non-Green Belt Sites such as those currently designated as Open Countryside in the first instance, such as our client's land.

Spatial Development Strategy

14. Cheshire East is now part of the Cheshire and Warrington Combined Authority. A mayoral election is scheduled for May 2027. The Mayoral Combined Authority will then lead on the preparation of a Spatial Development Strategy (SDS) for Cheshire and Warrington which will establish the growth strategy for the Combined Authority. While the process for the SDS has not

yet started, the emerging Cheshire East Local Plan will need to demonstrate general conformity with it, as well as the planning reforms made in national policy.

15. Set within this context, the Council must progress with its Local Plan under the new plan-making system. Our client is supportive of this, however there is a now a greater emphasis on boosting housing delivery to meet increased housing requirements and supporting additional economic growth. To do this, the Council must identify sufficient land to meet these requirements over the next plan period to support the role and function of its settlements.

Scope of the New Local Plan

Local Plan Period

16. The Scoping document confirms that, based on the Local Plan timetable, adoption is expected in March 2029. The new plan period is, therefore, proposed to be 2029-2045 (15 years).

17. This aligns with the minimum plan period set out in Policy PM2 of the recently revised NPPF (which has reduced the requirement to 'no less than 10 years from the point of adoption'). However the policy also makes clear that Local plans can cover a longer time period where this would, for example, help support the delivery of longer-term infrastructure or strategic development. The Policy also notes that Local Plans should reflect longer term expectations extending beyond the plan period where appropriate, including for any broad locations for growth and regeneration identified within a spatial development strategy, and any specific strategic site proposals.

18. We agree with the Council's approach to consider a Plan period longer than the minimum 10 years required by the NPPF. Due to the likely scale of new development which will need to come forward in the next plan period to meet the minimum Local Housing Need (LHN) requirement, coupled with the necessary infrastructure that will be required to facilitate future development, we consider that the plan period should be held at 15 years as a minimum, and ideally extended, to plan more effectively for the future growth of Cheshire East. This would allow the local authority to make strategic choices to support the aspiration for Crewe to grow into the 'best small city in Europe' by 2050. Such an ambition for Crewe can only be properly supported by a long term plan that maintains a continuous direction of travel in policy. Indeed, Cheshire East's next Local Plan needs enough ambition and permanence to truly shape the future of the Borough, and this can be better achieved by a Plan with a long term outlook.

19. Policy HO3 of the NPPF asks that Local Plans demonstrate:
    i) A supply of specific deliverable housing sites for five years following the intended date of adoption of the plan, with an appropriate buffer; and
    ii) A supply of specific, developable sites or broad locations for growth for the subsequent years 6 to 10 and, where possible, for the remaining plan period, where the plan covers more than 10 years.

20. The allocation of Waldron's Place, coupled with a planning application submission in 2026, would allow the Site to contribute to the 'supply of specific deliverable housing sites' within the first five years of the adopted Local Plan.

Vision and Objectives

21. The Scoping Document confirms that the new Plan must include a short vision, incorporating aims and objectives and up to 10 measurable outcomes to monitor progress.

22. Our client does not disagree with this approach, and we reserve detailed comments until the vision and objectives have been drafted. However, we note that the vision and objectives must be focussed on meeting the housing needs of the Borough, derived from the standard method calculation as a minimum, and ideally, promoting growth beyond that minimum.

23. Indeed, Policy HO2 of the revised NPPF notes that the housing requirement figure can 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. Crewe's growth ambition, and drive to become the 'best small city in Europe' by 2050 is a clear justification to not only meet housing needs, but also plan positively for growth.

Planning for Growth

Identifying and assessing sites

24. As part of the preparation of the new Local Plan, the Council must undertake a comprehensive assessment of sites which have been submitted as part of the Call for Sites process for future allocation. The Scoping Document confirms that the Council is preparing a Land Availability Assessment methodology, based on national guidance, and initial site assessments and further details of the methodology will be published at the next consultation stage.

25. Our client reserves detailed comments until the methodology has been published. However, at this stage we request that it identifies a sufficient number of sites that are not only suitable to meet the housing requirement for the Borough, but also match the growth ambitions the Council has specifically for Crewe.

26. In terms of site selection, it is acknowledged that brownfield land is preferred, and the development of brownfield land is supported by our client. However, brownfield land alone cannot meet the development needs of the borough, and also comes with significant viability constraints, which in turn restricts affordable housing and infrastructure provision. Therefore, greenfield sites which are on the existing edge of settlements, particularly non-Green Belt sites, should be prioritised. This includes our client's land at Waldron's Place. The assessment should also consider the viability of sites to ensure that they are indeed deliverable.

Settlement hierarchy

27. The current Local Plan Strategy has a four-tier settlement hierarchy, with Crewe in tier one (alongside Macclesfield) which is identified as a Principal Town. Our client is generally supportive of the settlement hierarchy and Crewe's establishment as a Principal Town which should be reflected in the next Local Plan, given the importance of Crewe and the Council's aspiration for this to be the 'best small city in Europe' by 2050.

28. Crewe is one of only two Principal Towns in the borough. However, despite being the largest town in Cheshire East, Crewe's unemployment rate is higher than the borough average and Crewe's residents have the lowest average (mean) income within Cheshire East. Therefore, the Council should ensure that the new Local Plan supports the sustainable growth of Crewe through the provision of new market and affordable homes, employment opportunities, improvements to local infrastructure and access to open space. To do this, our client considers that allocation of larger, strategic sites on the periphery of Crewe can help to address these deficiencies holistically.

29. The Scoping Document confirms that the settlement hierarchy will be reviewed. We do not object to this approach to ensure development is distributed towards settlements in a balanced and informed way. Further, we reiterate that Crewe should remain the key focus for future growth, and should be placed ahead of Macclesfield in the settlement hierarchy. As a growing town, not constrained by Green Belt (unlike Macclesfield), and with 360 degree connectivity as a result of Crewe Train Station, Crewe should be placed at the top of the settlement hierarchy and identified as the 'growth hub' for the Borough.

30. As a whole, the settlement hierarchy should ensure a balanced approach to future growth, in which the needs and roles/function of each settlement are met.

31. We therefore agree with the approach for a settlement hierarchy to help to inform the spatial distribution of development and approach to site allocations.

Spatial distribution

32. The Scoping Document identifies a range of factors that will influence the spatial distribution of development in the emerging Local Plan, including (but not limited to) housing demand and availability, affordable housing need, availability of jobs, infrastructure, landscape and ecological considerations, and amount of available brownfield land.

33. Our client does not object to any of these factors, and it is crucial that the spatial distribution of development is rooted in meeting the needs of residents, while being proportionate to the role and function of each settlement. This ensures a balanced and sustainable pattern of development across the Borough, and that development is delivered both where it is needed, and where it is most suited.

34. As articulated above, Crewe is a key focus for growth, is extremely well connected, and is unconstrained by the Green Belt. As such, we consider that the town can accommodate a significant level of growth over the next plan period, to both help meet the increased housing requirement and contribute towards its revitalisation.

<u>Housing</u>

35. As articulated above, the standard method should be used as a starting point for calculating Cheshire East's LHN figure. However, this does not inform the types, sizes or tenures of homes required to meet the needs of different groups.

36. The Scoping Document confirms that a Housing Needs Assessment will be prepared to understand what types of homes are needed. Our client is supportive of this assessment and will provide more detailed commentary at the next consultation stage once it is published. At this stage, we provide initial commentary on housing needs below.

Affordable housing

37. The affordable housing requirement should be informed by the outcomes of the Housing Needs Assessment. However the levels and types of affordable housing provision required by the Plan should not undermine the deliverability of the Plan. As such, the Council should also provide viability evidence which can justify the level of affordable housing which is to be proposed.

38. In terms of tenure of affordable homes, the forthcoming Local Plan should ensure there is an element of flexibility to take into account site specific circumstances, viability, the requirements of Registered Providers, and changing circumstances / needs.

39. It is also worth noting that brownfield sites are historically challenging to deliver affordable homes due to viability constraints. This further demonstrates that the Council must consider greenfield sites in sustainable locations that have the capability to deliver on-site affordable homes to meet the needs of its residents. This also includes higher levels of affordable housing on sites released from the Green Belt.

Housing Mix

40. As set out above in relation to affordable housing tenure, the new Local Plan must include flexibility in terms of housing mix to ensure developers can respond to site specific circumstances and other factors such as viability and changing local demand.

<u>Transport and Infrastructure</u>

41. We agree with the Council's recognition that transport and infrastructure are essential to supporting sustainable communities and future growth in Cheshire East. Identifying the transport and infrastructure needed is critical to support planned growth.

42. The Scoping Document goes on to state that national planning policy requires a vision-led approach to transport planning, promoting sustainable travel patterns, making effective use of existing transport infrastructure and planning for new infrastructure where necessary.

43. Our client welcomes the strategic approach to transport and infrastructure delivery, to ensure that it supports wider aspirations to revitalise and improve settlements, as well as the localised improvements which can be achieved through smaller speculative applications. Larger, strategic sites which are allocated for development in the Local Plan have the potential to provide this vision-led approach to transport and infrastructure planning, which can help to unlock opportunities to promote sustainable travel, improve connections to employment opportunities, local services and facilities, open spaces and achieve truly place-based improvements.

44. As set out further below, our client's land interest at Waldron's Place has the opportunity to provide a holistic approach to transport and infrastructure delivery to the north of Crewe, which will contribute to the wider aspirations to revitalise this Principal Town. This should be encouraged through the Local Plan, whereby allocated sites can plan for wider transport and infrastructure improvements.

45. Sites that are located in good proximity to train stations should also be prioritised within the Local Plan. With Crewe Rail Station only a 10-minute drive or 15-minute cycle from the Site, it is clear that the land at Waldron's Place is located in a prime position to capitalise on Crewe's 360 degree connectivity.

Health & Wellbeing

Health and Health Inequalities

46. We agree that the Local Plan will need to support healthy and inclusive communities through access to community facilities, public services, recreation opportunities and green spaces. This may include local standards for outdoor recreation and the designation of Local Green Spaces. The development of Waldron's Place has the potential to deliver a significant new area of green space for the local community. The creation of a new country park as part of the development will enable the Local Authority to deliver on a long held ambition to create more green space in this part of Crewe, to balance out the current shortfall of accessible public open space in north east Crewe. Indeed, the 2019 Green Infrastructure Strategy document states that '*There is also potential for green links represented in the original 'GI Action Plan for Crewe' along with new opportunities such as transforming the Maw Green former waste site into green space, which could provide links for north Crewe and potential to link towards the Sandbach flashes.'*

47. As the Maw Green former waste site now looks to be turned into a solar photovoltaic array and battery energy storage system (BESS) site (an EIA screening opinion was lodged earlier this year), an area for accessible green space in northern Crewe will have to be sought elsewhere. The land at Waldron's Place, in the form of a new country park, offers this opportunity. Further, in a recent Council Corporate Policy meeting (30th April 2026), the Council acknowledged that the wider vision going forward is to promote a circular green corridor route aimed at supporting active travel and green space around Crewe – with a working title as the 'Crewe Loop'. Waldron's Place has the potential to connect into this 'loop', providing enhanced accessibility in the countryside around Crewe, which has the potential to improve health inequalities in this part of the Borough.

Conclusion

---

61. These Representations are submitted to Cheshire East Council on behalf of our client, Mac Mic Strategic Land Ltd (representing the Waldron's Place Landowner Group), in response to the current Scoping Consultation which runs until 1st September 2026.

62. Our client welcomes the Council's intention to begin a new Local Plan which reflects latest changes to national planning policy and the new plan-making system.

63. Whilst the Local Plan is in its infancy, and the Council is seeking views on the scope for the new Local Plan, our client has provided high-level commentary on what the Local Plan should consider, primarily to ensure that sufficient growth is delivered over the next plan period to meet the LHN requirement, as a minimum, and to ensure the role and function of Crewe is supported.

64. We strongly believe that the Council should adopt an aspirational approach to residential growth, whereby sufficient housing land is comprehensively assessed, and subsequently allocated for future development in sustainable and well-connected locations which are free from significant constraints, and which are well-related to the existing urban area.

65. As such, additional land will need to be allocated, and we consider that the Council must look to greenfield sites in the Open Countryside and Green Belt that can meet those needs in the next plan period and beyond.

66. Our client's land interests at Waldron's Place, located on the northeastern periphery of Crewe, represents a logical extension to the Principal Town which is earmarked to be the best small city in Europe by 2050. Our client's site represents an exciting opportunity for future allocation, and can contribute to the Council's immediate five-year housing land supply, and additional supply in the next 5-10 years.

67. We trust that these Representations will be afforded full consideration by the Council, and should the Council have any queries regarding the information contained within these Representation, then we would be happy to assist.

Yours faithfully,

Jordan Clark
Associate Planner