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

1st September 2026

Dear Sir/Madam

Cheshire East Local Plan Scoping Consultation: Miller Homes Representations

These representations have been prepared by Marrons on behalf of Miller Homes Limited in response to the Cheshire East Local Plan Scoping Consultation. [Redacted]

At the outset, Miller Homes welcomes the Council's progress in preparing a new Local Plan for Cheshire East. The preparation of a new Plan provides an opportunity to re-establish a plan-led approach to growth across the borough, particularly given the absence of up-to-date strategic policies since July 2022. The breadth of topics included as part of this initial consultation is also supported, as it provides an opportunity for the Council and key stakeholders to review aspects of the current Local Plan that have not delivered as originally envisaged.

[Redacted]

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RTPI Chartered Town Planner
RIBA Chartered Practice

Planning for Housing

The Scoping Consultation identifies that application of the revised standard method for calculating local housing need results in a requirement for 2,530 dwellings per annum in Cheshire East. This represents a substantial increase when compared with the housing requirement of 1,800 dwellings per annum set out in the adopted CELPS.

Miller Homes considers that the new Local Plan should adopt a positive approach to addressing housing needs across the borough throughout the Plan period, consistent with the

overarching objective of national planning policy to significantly boost the supply of homes. At a minimum, the Local Plan should make provision for housing growth equivalent to the identified local housing need of 2,530 dwellings per annum.

In circumstances where allocations contained within the CELPS or the Site Allocations and Development Policies Document (SADPD) have not come forward as anticipated, the Council should review whether they remain suitable for inclusion within the new Local Plan. Planning Practice Guidance (PPG) confirms that factors such as the length of time a site has been allocated, its planning history, and whether circumstances have changed since allocation in a way that has reduced the likelihood of development proceeding as originally intended should be taken into account when considering whether there is a realistic prospect of delivery.

A number of significant strategic allocations identified within the CELPS have failed to deliver development at the rate or scale envisaged at the time of adoption in 2017. The evidence base prepared in support of the new Local Plan should therefore examine the reasons for this underperformance to ensure that lessons are learned and repeated shortcomings are avoided. This will assist in ensuring that future allocations comprise sites that are genuinely available, suitable and developable, including Miller Homes' land interest at Cemetery Road, Weston.

Policy HO1 of the NPPF confirms that development plans should be informed by an assessment of the size, type and tenure of homes, together with the housing needs of different groups within the community. Miller Homes considers that the most effective means of meeting these needs is through a positive and ambitious strategy for housing growth. The allocation of a sufficient supply of deliverable housing land in sustainable locations, such as Miller Homes' land interest at Cemetery Road, Weston, that can come forward to meet housing needs in the short term will help maintain a plan-led approach. Where housing delivery fails to keep pace with identified need, the consequences are felt across all sectors of the community. Accordingly, the evidence base supporting the new Local Plan should assess not only the economic and social benefits associated with housing delivery, but also the implications of failing to pursue an ambitious strategy capable of meeting the needs of existing and future residents throughout the Plan period.

The Scoping Consultation confirms that a Housing Needs Assessment will be prepared to consider matters including affordable housing needs, housing for older people, specialist accommodation, self-build and custom housebuilding, and the appropriate mix of dwelling sizes and tenures across the borough. When translating this future evidence base into planning policy, sufficient flexibility must be retained to respond to needs and circumstances that may not have been foreseeable when the Local Plan and supporting evidence were prepared. Any policies introduced to address identified housing needs should therefore incorporate an appropriate degree of flexibility, recognising that housing requirements are likely to evolve over the lifetime of the Plan. An overly prescriptive approach risks creating unnecessary barriers to development and undermining the future plan-led approach.

Flexibility is now encouraged in national planning policy, with NPPF Policy HO8 stating that a flexible approach should be applied to development plan requirements relating to the number of bedrooms provided within market housing schemes that meet or exceed up-to-date development plan requirements for the proportion and tenure mix of affordable housing. This

flexible approach must be reflected in any local policies on housing mix progressed through the new Local Plan.

Distribution of Growth

The CELPS establishes a four-tier settlement hierarchy for the borough. The fourth tier comprises settlements identified as 'Other Settlements and Rural Areas' (OSRA). Weston is classified as an OSRA. The CELPS planned for the delivery of 2,950 dwellings within OSRAs over the period 2010 to 2030.

Miller Homes wishes to highlight that Weston was assessed as part of the August 2020 SADPD evidence base document, *Settlement and Infill Boundaries Review*. This concluded that Weston is served by public transport, has a coherent spatial form, and benefits from a reasonable level of service provision. At an earlier stage in the preparation of the CELPS, Weston was identified as a 'Sustainable Village' within the settlement hierarchy, below Local Service Centres but above Rural Villages, although this tier was not ultimately carried forward into the adopted CELPS.

Weston has also accommodated development growth over the CELPS period, including a 99-dwelling scheme approved at appeal in 2016 (ref. APP/R0660/W/15/3132073), which has now been built out. In allowing that appeal, the Inspector concluded that Weston was a sustainable location for new housing development, making reference to local services, facilities, access to public transport and its proximity to Crewe.

Miller Homes considers that the settlement hierarchy should be reassessed as part of the preparation of the new Local Plan. The role and function of Weston must be considered within this exercise, in the context of the growth it has experienced over the past decade and its characteristics as a well-connected and well-served settlement. These factors should result in the settlement being promoted within the settlement hierarchy to a Local Service Centre.

Strategic Green Gaps

Current CELPS Policy PG5 establishes areas designated as Strategic Green Gaps. The policy states that their purposes are to provide long-term protection against coalescence, protect the setting and separate identity of settlements, and retain the existing settlement pattern by maintaining the openness of land.

As part of the preparation of the new Local Plan, the Council must review its Strategic Green Gap policy in the context of NPPF Policy S2. This NPPF policy confirms that designations and associated policies intended to safeguard gaps between settlements should be used only where necessary to maintain their separate identities and physical separation, and should be no larger than required to achieve that aim.

Miller Homes considers that the extent of some Strategic Green Gaps around Crewe is greater than is necessary, particularly given the presence of physical barriers that already provide the requisite degree of separation. Recent planning permissions within the Strategic Green Gap have demonstrated that the current policy is both out of date and ineffective. On that basis,

Miller Homes considers that the Council should not pursue Green Gap or separation policies through the new Cheshire East Local Plan.

Identifying and Filtering Sites Through the Site Selection Process

The Scoping Consultation confirms that sites submitted through the 2024 and 2026 Call for Sites exercises will be assessed to establish their suitability, availability and deliverability. [Redacted]

Miller Homes understands that the Council is preparing a land availability assessment methodology, informed by national planning guidance, to identify and evaluate potential development opportunities across the borough. The consultation notes that this methodology, together with the outcomes of the initial site assessments, will be published at the next stage of the plan-making process.

The Scoping Consultation explains that the assessment methodology will set out the Council's approach to filtering out sites that are clearly unsuitable for development, the assumptions that will be applied in relation to development capacity and delivery trajectories, and the scoring criteria against which sites will be assessed. The outcome of this process will be the identification of a pool of sites to be taken forward for further consideration as potential draft allocations.

The Government has published guidance on the identification and assessment of sites to support the preparation of plans under the new plan-making system. The guidance establishes a clear framework for considering the suitability, availability and achievability of sites. [Redacted]

Miller Homes requests that a further Call for Sites exercise be undertaken before the initial assessment process commences to ensure that all sites with the potential to be allocated have been identified and can be assessed as part of the exercise.

Relationship with Other Development Plan Documents

Chapter 2 of the revised NPPF sets out the different components of the development plan, each of which has a discrete purpose and is expected to address issues positively. This revised approach to plan-making establishes a clear and distinct role for each component of the development plan, ensuring that matters are addressed at the most appropriate level.

The emerging Cheshire East Local Plan should therefore reflect its intended function within the wider development plan framework and be prepared in a manner that aligns with the requirements of relevant legislation and national policy. The emerging Local Plan's relationship with other parts of the development plan is discussed below.

Spatial Development Strategy

The new Local Plan for Cheshire East is being prepared in the context of the Cheshire and Warrington Spatial Development Strategy (SDS). In accordance with NPPF Policy PM1, the SDS should set a positive vision for future growth and change at a sub-regional scale and provide a clear spatial framework for housing growth. Policy PM1 further states that the SDS should establish a strategy for a sustainable pattern of growth over a period of at least 25 years, including through the apportionment of housing need. SDSs should also identify broad locations for development.

The Scoping Consultation indicates that the new Cheshire East Local Plan is expected to be adopted in Q1 2029. As set out in the Devolution White Paper, the preparation of an SDS should not delay the preparation of Local Plans. Given the anticipated timescales, it is likely that the Cheshire East Local Plan will be prepared and adopted ahead of the Cheshire and Warrington SDS.

As a consequence, the Local Plan may need to address a number of strategic matters that might otherwise have been dealt with through an SDS under future plan-making arrangements. Nevertheless, once prepared, the Local Plan will be required to be in general conformity with the SDS. In light of the evolving nature of both documents, Miller Homes reserves the right to make further representations on the relationship between the emerging Local Plan and the SDS as additional information becomes available through the plan-making process.

Neighbourhood Plan

Miller Homes' land interest at Cemetery Road, Weston is located within an area covered by a Neighbourhood Plan. The Weston & Basford Neighbourhood Plan was made in December 2017 and subsequently modified in February 2024.

The Weston and Crewe Green Neighbourhood Plan is currently being prepared by Weston and Crewe Green Parish Council. Miller Homes understands that this plan will replace the Weston & Basford Neighbourhood Plan, once made. Examination of the new Neighbourhood Plan took place between February and June 2026. The Examiner's Report was published on 3 June 2026, and the referendum is scheduled for 3 September 2026.

NPPF Policy PM5 provides that the content of a neighbourhood plan should not result in less development than is specified in other parts of the development plan covering the same area. In addition, NPPF Policy S6 states that conflict with a neighbourhood plan is likely to substantially outweigh the benefits of development only where both of the following apply:

i. The neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and
ii. The neighbourhood plan contains allocations to meet its identified housing requirement.

The emerging Weston and Crewe Green Neighbourhood Plan does not include allocations to meet its identified housing requirement. This is confirmed in paragraph 4.2 of the Examiner's Report, which states that the Plan does not allocate sites for development. In accordance with

Policy PM5, the new Cheshire East Local Plan should therefore plan positively for development in Weston, and the emerging Neighbourhood Plan should not act as a barrier to growth should it pass referendum and be made.

National Decision-Making Policies

A further change to the planning system is the introduction of National Decision-Making Policies (NDMPs), which were incorporated into the NPPF published in August 2026. NDMPs now form material considerations for the purposes of decision-making and are intended to be read alongside the NPPF as a whole. Certain NDMPs also identify the weight to be attached to particular matters, including instances where substantial weight should be afforded to specific benefits and the limited circumstances in which planning permission would generally be expected to be refused.

The implications of NDMPs for Local Plan preparation are set out in NPPF Policy PM6, which confirms that Local Plans must not duplicate, substantively restate, or be inconsistent with national policy contained within NDMPs. In this context, Miller Homes considers that the new Cheshire East Local Plan should adopt a streamlined approach, focusing on locally specific matters rather than repeating policy requirements that are already addressed through NDMPs.

Viability and Infrastructure Delivery

Recent reforms to national planning policy place greater emphasis on testing viability through the plan-making process, with the objective of reducing the need for viability assessments at the planning application stage. In light of this approach, the new Local Plan should be supported by a robust and comprehensive Viability Assessment. It will be important that all proposed policy requirements, including housing standards, infrastructure contributions and other development obligations, are reflected within the assessment before consultation documents are published. This will ensure that stakeholders, including Miller Homes, are able to engage meaningfully with, and comment on, the potential development costs arising from the proposed policy framework.

To ensure a comprehensive understanding of the deliverability of the future Local Plan strategy, the Viability Assessment should be prepared alongside an Infrastructure Delivery Plan (IDP). The IDP should identify the infrastructure necessary to support the proposed pattern of development, quantify any funding gap associated with meeting those requirements, and set out a clear mechanism for addressing any shortfall.

Conclusions

Miller Homes welcomes the Council's progression in preparing a new Local Plan for Cheshire East. The emerging Plan provides an important opportunity to re-establish a robust plan-led approach to development across the borough, ensuring that future housing, economic and infrastructure needs are addressed through a positively planned and deliverable development growth strategy.

These representations have highlighted the importance of planning positively for housing growth, reflecting the significantly increased local housing need arising from the revised

standard method. The new Local Plan should ensure that development needs for different groups are met in full through the allocation of deliverable and sustainable sites, supported by a flexible policy framework that is capable of responding to changing circumstances over the period of the Plan. The preparation of the new Local Plan also provides an opportunity to review the effectiveness of existing policies and allocations, ensuring that future growth is directed to locations that can genuinely contribute towards meeting the borough's development requirements.

Miller Homes considers that Weston is a sustainable and well-connected settlement with a strong range of services and facilities, and close links to Crewe. The role and function of the settlement should therefore be reassessed through the preparation of the new Local Plan, and consideration should be given to its position within the settlement hierarchy. [Redacted]

We trust that these representations will be given full consideration and would be pleased to discuss any aspect of them further as the plan-making process progresses.

Please get in touch if you have any questions.

Yours faithfully,