ASTEER
PLANNING

Response to Consultation on the Cheshire East Local Plan Scoping Consultation

On behalf of Richborough

August 2026

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1 INTRODUCTION

1.1 These representations have been prepared by Asteer Planning LLP ("Asteer"), on behalf of Richborough, in response to the Cheshire East Council ("CEC") Local Plan Scoping Consultation, which is open until 1st September 2026 and seeks views on the scope and direction of a new Local Plan for the Borough.

1.2 The emerging Local Plan for Cheshire East provides a unique opportunity for the Borough to holistically plan for its strategic growth, including its housing and employment needs, and to capitalise on its intrinsic strengths over the next Plan period and beyond, by planning for the type, quality and scale of land that will support its economic and social growth over the next 15-20 years.

1.3 It is acknowledged that the Scoping Consultation does not provide an opportunity for the submission or discussion of individual sites and, accordingly, Richborough's responses are not site-specific. However, for context, the responses have been prepared with regard to sites previously submitted by Richborough through the Call for Sites process, which Richborough considers should be taken into account in developing the spatial strategy and approach to land allocations. Richborough respectfully requests that the sites submitted during previous Call for Sites consultations, in 2024 and earlier in 2026, are fully considered as the scope of the Local Plan is established and as the spatial strategy is developed.

1.4 Richborough would welcome continuous engagement with the Council as the Scoping Consultation responses are considered and the preparation of a new Local Plan is progressed. Richborough would be happy to discuss any feedback in relation to these representations, or in relation to information which has been previously submitted via the Call for Sites.

2 SCOPING CONSULTATION COMMENTS

2.1 Richborough fully supports the preparation of a new Local Plan for CEC and considers it essential to be able to plan for the future needs of the Borough. These representations provide Richborough's response, which seeks to inform the emerging Local Plan spatial strategy, strategic policies and land allocations. This includes comments on The Scope of the New Local Plan (Chapter 5 of the Scoping Consultation) including on:

- The Local Plan Period;
- Vision and Objectives;
- Planning for Growth;
- Housing;
- Climate and Sustainability; and
- The Evidence Base.

2.2 The comments have been informed by the relevant national planning policy and guidance, including the new National Planning Policy Framework ("NPPF"), published on 17th August 2026, and the Planning Practice Guidance ("PPG").

Local Plan Period

2.3 Richborough's principal concern regarding the Local Plan period is that it should be extended to 2050 (rather than to 2045 as set out in the Scoping Consultation). Richborough acknowledges that a 15 year plan period is consistent with the requirements of the PPG and the NPPF. However, it is important to recognise that national policy establishes this as a minimum plan period and does not preclude a longer timeframe where this would support the delivery of longer-term infrastructure or strategic development. In this regard, NPPF Policy PM2 (1)(b) expressly provides for the plan period to extend beyond the minimum where this would assist in securing the delivery of longer-term infrastructure or strategic development.

2.4 An extended plan period would provide contingency in the event of delays to plan preparation, examination or adoption and be beneficial in accommodating the significant infrastructure requirements associated with strategic-scale development, particularly

given the potentially lengthy lead-in times for delivering such infrastructure. It would also help in ensuring that CEC maintains a sufficient and resilient supply of deliverable development sites throughout the lifetime of the Plan. This would reduce the likelihood of the Council encountering a shortfall available in land for housing and employment during the Plan period. It would also provide increased certainty and confidence for landowners, developers, infrastructure providers and local communities in relation to the long-term development strategy for the Borough.

Creating a Vision and Objectives

2.5 In accordance with the NPPF, the Local Plan vision must have *"particular regard to meeting the identified development needs of an area in a sustainable manner in accordance with policy S1"* (Policy PM2 (1)(a)(iv)). Therefore, the vision should set out a clear and positive framework for how the Borough will accommodate its development needs, including capturing the Borough's critical need for new homes, and the type, tenure and quality of housing that will meet this need.

2.6 The ten objectives that sit under the vision should explain how the Borough's housing needs will be delivered, including capturing:

- The type, tenure and quality of housing that will meet the need;
- The broad locations of growth for varying types of development;
- Spatial strategy and settlement hierarchy (Richborough's comments on the settlement hierarchy are expanded on more later in this response).

2.7 Overall Richborough considers that the vision and objectives should be ambitious, proactive and focussed on delivery, providing a positive response to the scale of growth facing Cheshire East and ensuring that the Plan maximises the opportunities arising from that growth.

Planning for Growth

Identifying and Assessing Sites

2.8 Richborough supports the Council's intention to undertake a comprehensive and transparent assessment of potential development sites to ensure that sufficient land is identified to meet Cheshire East's housing and employment requirements. The site

selection process should, however, be sufficiently flexible to consider the full range of opportunities available and should not unduly restrict the potential contribution of sites based on overly prescriptive criteria at an early stage.

2.9 The emerging land availability assessment methodology should assess sites against the established principles of suitability, availability and deliverability, alongside their contribution to the Council's wider spatial strategy and sustainability objectives. In particular, Richborough considers that the following matters should inform the assessment and subsequent site selection process:

- **Settlement hierarchy and spatial strategy**: sites on the edge of Principal Towns and Key Service Centres should be a particular focus for growth given that these locations are inherently the most sustainable locations for development, through their existing range of services, facilities, employment opportunities and public transport connections.

- **Green belt and grey belt:** including the contribution made to the purposes of the Green Belt, and where applicable, whether the land constitutes Grey Belt as per the definition in the NPPF (Annex 2).

- **Location and relationship to settlements:** including the physical and functional relationship of the site with the settlement, opportunities for integration with the existing built form, and whether development would represent a logical extension to the settlement. Greater weight should be given to sites that are well related to existing settlements, particularly those that can form logical extensions to established urban areas and benefit from existing services, facilities, employment opportunities and infrastructure.

- **Sustainability and accessibility:** site selection should have regard to the principles of sustainable development and should consider the extent to which sites support appropriate densities and a sustainable distribution of homes, and can be served by, and provide convenient access to, public transport, walking and cycling networks. The availability of local services, facilities and employment opportunities should also be considered.

- **Deliverability and infrastructure:** the methodology should give consideration to land ownership, market attractiveness, infrastructure requirements, planning constraints, and the likely timescales for delivery. The assessment should recognise that larger strategic sites may require longer lead-in periods but can nevertheless make an important contribution to meeting longer-term development needs.

- **Scale and wider benefits:** the assessment should recognise the particular contribution that larger sites, particularly those capable of delivering 100 or more homes, can make to meeting housing requirements and creating sustainable communities. Such sites can provide greater opportunities to deliver a broad mix of housing types and tenures, the provision of affordable housing and public open space, green infrastructure, and contributions to community facilities, and transport and other necessary infrastructure.

2.10 The assessment should also recognise the need for a robust and continuous supply of land throughout the Plan period. This is particularly important given the varying delivery rates associated with different sites. Sites should therefore be assessed against both their ability to contribute towards short and medium-term requirements and their potential role in meeting longer-term growth needs.

Green Belt

2.11 Richborough supports CEC's intention to undertake a comprehensive review of the Green Belt across the Borough, which should be undertaken in accordance with Policies GB1 – 8 and Annex E of the NPPF. Given the scale of CEC's housing requirement and the current position regarding housing land supply, it is considered unlikely that there will be sufficient brownfield land within the Borough to meet the identified need. The Green Belt Review will therefore form a crucial part of the Local Plan evidence base and should provide a comprehensive assessment of Green Belt sites. In particular, it should clearly identify land that falls within the definition of Grey Belt, ensuring that such land is appropriately considered as part of the wider site selection process.

2.12 The outcomes of the Green Belt review should be considered alongside the Council's housing and employment needs, the emerging spatial strategy and the sustainability and deliverability of individual sites. This should include consideration of the relationship

between potential Green Belt release and existing settlements, accessibility to services and facilities, transport connections and opportunities to create sustainable patterns of development.

Strategic Green Gap

2.13 Richborough considers that the assessment of Strategic Green Gap should focus on the actual function and contribution of individual sites to maintaining settlement separation and identity. Land that makes little or no meaningful contribution to these purposes should not be treated as presenting the same level of constraint as land that is critical to preventing settlements from coalescing.

Settlement Hierarchy

2.14 Richborough supports CEC's intention to review the settlement hierarchy based on an up-to-date assessment across the Borough. The settlement hierarchy review should identify the capacity and potential of Principal Towns and Key Service Centres to accommodate growth, including opportunities for larger-scale development (of 100+ dwellings) and the supporting infrastructure. Where a settlement has the capacity to accommodate sustainable growth, this should be recognised within the settlement hierarchy and spatial strategy, and an elevation of settlements that can accommodate large scale growth and infrastructure should be considered.

2.15 The assessment should also have regard to the functional relationships between settlements, including commuting patterns, travel-to-work areas, transport connections and shared services and facilities. This is particularly important in assessing settlements which may have a strong functional relationship with larger employment and service centres despite having a smaller population or a lower position within the existing settlement hierarchy.

2.16 Therefore, Richborough supports CEC preparing an evidence-led settlement hierarchy which recognises future potential, which can provide a framework for directing growth towards settlements where development can be accommodated sustainably and can contribute positively to their long-term vitality and resilience.

Spatial Distribution

2.17 Richborough supports a balanced spatial strategy that apportions growth across the Borough, with a higher level of growth attributed to the Borough's largest settlements including Principal Towns and Key Service Centres, that is proportionate to their size, role and function. This should be informed by housing and employment needs, infrastructure capacity, settlement function, accessibility, commuting patterns and the sustainability of existing settlements.

2.18 The spatial strategy should also consider the potential for development to strengthen existing settlements and supporting the long-term vitality and sustainability by increasing the population using local services and facilities, and where appropriate, providing the critical mass necessary to support new or enhanced infrastructure and community facilities.

2.19 Richborough considers that this is particularly important when assessing potential strategic urban extensions. Larger-scale development (of 100+ dwellings) can provide opportunities to deliver infrastructure and place-making benefits which may not be achievable through dispersed smaller sites, including new schools and community facilities, affordable housing, sustainable transport improvements, accessible green space, biodiversity enhancements and improvements to existing infrastructure.

2.20 Overall, Richborough considers that the spatial strategy should seek to locate development where people can access jobs, services and facilities sustainably, whilst supporting the long-term vitality of existing settlements and making effective use of existing and planned infrastructure. A balanced distribution of growth, directing the majority of growth towards Principal Towns and Key Service Centres, as the most sustainable locations in the Borough, would make an important contribution towards achieving these objectives and ensure that the benefits associated with growth are appropriately distributed across Cheshire East.

Housing

Housing Need

2.21 Richborough considers that overall housing need should be recognised as one of the principal issues facing the Borough. The most up-to-date Local Housing Need figure for CEC is 2,424 dwellings per annum ("dpa") which is significantly higher than the adopted

figure of 1,800 dpa (and more than double the previous Local Housing Need of 977 dpa). Therefore, the emerging Local Plan will have to accommodate a significantly increased housing requirement whilst ensuring that sufficient deliverable sites are allocated to maintain a robust housing land supply and delivery throughout the plan period.

2.22 The importance of identifying a robust supply of housing is reinforced by the Council's Housing Monitoring Update which confirms that CEC cannot currently demonstrate a five year housing land supply, with a 3.3 year supply. This highlights the need for the emerging Local Plan to provide a resilient and flexible portfolio of allocations capable of maintaining a demonstrable five-year housing land supply on adoption and throughout the lifetime of the Plan. Doing so will provide greater certainty for communities, developers and infrastructure providers, whilst reducing; the reliance on, and effects from, the unplanned nature of speculative planning applications arising from an insufficient supply of housing land.

2.23 Richborough supports CEC undertaking an up-to-date Housing Needs Assessment to identify the key housing issues that the Local Plan will need to address, and planning positively for meeting housing needs with a balanced portfolio of allocations including both strategic urban extensions and smaller, sustainable sites, to ensure that housing delivery is resilient and responsive throughout the Plan period.

Affordable Housing

2.24 Alongside the overall housing requirement, addressing affordable housing needs represents one of the Borough's most significant challenges. As part of the evidence base for the current Local Plan, the Issues Paper identified that the median house price affordability ratio in the Borough was 8.14, increasing from 5.8 in the five years between 2018 and 2023. The Strategic Housing Market Assessment ("SHMA") Update (2013) identified an annual net shortfall of 1,401 affordable homes, which represents a significant proportion of the housing needs for the Borough.

2.25 A lack of housing will result in further constraints on supply and increasing house prices, restricting the ability of first-time buyers to enter the market and further exacerbating the demographic disparities. This inability to accommodate for a working-age population results in a lack of support for the local economy and a decline of local services and facilities, as well as limiting the pool of available staff for local employers.

2.26 The delivery of affordable housing is intrinsically linked to the point above regarding meeting overall housing needs. Affordable housing is principally delivered through market-led residential development, so the Plan will need to allocate a sufficient number of viable housing sites capable of delivering affordable homes alongside market housing.

2.27 It is also important that the emerging Plan comprehensively viability tests the level of affordable housing on proposed allocated sites so that at the time of a planning application there is clarity on the level being sought. There may be differing affordable requirements across different allocations.

Housing Mix and Standards

2.28 Richborough supports the opportunity identified by CEC to review and update the housing mix policies within the emerging Local Plan. Richborough considers that a flexible approach should be implemented, which enables development to respond to local needs rather than having a broad brush approach across the Borough. A flexible policy approach should reflect local circumstances across the Borough, respond to market demands, and remain flexible to changes such as demographic change throughout the Plan period.

Climate Change Adaptation

2.29 Richborough fully supports reducing emissions, and addressing and adapting to the effects of climate change. In delivering sustainable and energy efficient buildings and new development, it essential that the Council identifies sites that are viable, deliverable and which can deliver environmental benefits, such as biodiversity enhancement, new open spaces, green infrastructure and energy efficiency measures.

2.30 This means ensuring a balanced supply of sites, greenfield as well as brownfield, to ensure that these features can be viably incorporated into new development.

Evidence Base

2.31 Richborough supports the Council's intention to develop a comprehensive and up-to-date evidence base to underpin the new Local Plan. In addition to those identified, Richborough suggests that the Council also identifies the following key evidence base documents:

- **Green Belt Assessment** – (the need for an up-to-date assessment is identified in the Green Belt section above so assume it's omission in the list is a mistake) an up-to-date assessment should be undertaken to inform the strategic review of Green Belt land and ensure that site selection is based on current evidence and the latest NPPF.

- **Open Space Assessment** – a comprehensive and current assessment of open space provision, quality, accessibility and deficiencies should inform decisions on the protection of existing open space and the provision required through new development.

- **Landscape Character Assessment/Appraisal** – an updated assessment should reflect current landscape character, sensitivity and capacity to accommodate development and should be used consistently in site assessment and the spatial strategy.

3 SUMMARY AND CONCLUSIONS

3.1 In summary, Richborough considers that the new Local Plan provides a generational opportunity to plan for the future of Cheshire East and should adopt a pro-growth approach to deliver the homes to address the significant housing needs for CEC's residents, alleviate affordability issues and support economic growth during the next 15-20 years.

3.2 Richborough considers that a balanced spatial strategy will be essential to delivering sustainable growth across Cheshire East, including a focus on attributing growth to the Borough's Principal Towns and Key Service Centres. Distributing growth in this way would support the vitality and long-term sustainability of communities across the Borough, ensuring that a range of settlements can benefit from investment, new infrastructure and increased local spending. The distribution of growth should also reflect established employment patterns, access to jobs and services, and evidence of where people want and are likely to live, helping to align new housing with both existing communities and the Borough's wider economic needs.

3.3 Richborough would welcome engagement with the Council on these representations, or any of the sites submitted through the Call for Sites, and this can be arranged via Asteer.