



PROTECT BUTTERFLY BANK

Representation to the Cheshire East New Local Plan Scoping Consultation

Stockton Farm / Butterfly Bank / WM27 & WM28 / CFS26 246, HE 274

Call for Sites Submission | August 2026

Protect Butterfly Bank welcomes the opportunity to comment at the scoping stage of the new Cheshire East Local Plan. Protect Butterfly Bank is a community campaign representing residents of South Wilmslow who are directly affected by the promotion of this site for development.

Stockton Farm / Butterfly Bank has been submitted through the Call for Sites process for housing development. Its inclusion does not mean that the land has been allocated for development. However, because this Green Belt site is now being considered as part of the new Local Plan, we believe the following matters must form part of Cheshire East's evidence and assessment before any decision is made about whether the site should progress.

In assessing Stockton Farm, Cheshire East should apply the August 2026 NPPF as a whole, including all policies and assessment requirements relevant to Green Belt and grey belt (GB1-GB8, Annex E), settlement separation, flood risk (F4-F8), landscape and ecology (N1-N6), sustainable transport (TR1-TR8), infrastructure, site selection and deliverability. This representation identifies the site-specific matters which we consider the Council's evidence base should address.

1. GREEN BELT

Stockton Farm is Green Belt land forming part of the open countryside between the southern edge of Wilmslow and Alderley Edge.

The site falls within Green Belt parcels **WM27 and WM28**, both of which were rated as making a **"Significant Contribution"** to Green Belt purposes in the **2015 Arup Green Belt Assessment**. Wilmslow Town Council has stated in its own representation to this consultation that the Arup assessment *"should be at the cornerstone of all site assessments"* (WTC response, 12 August 2026). We strongly support that position.

Any assessment should apply the new national Green Belt policy (GB1-GB8) and the Annex E methodology, and consider the contribution of the land to the relevant Green Belt purposes, both individually and as part of the wider Green Belt.

The assessment should also consider the consequences of subdividing or releasing this land and whether any resulting Green Belt boundary would be robust and defensible over the long term.



The 2015 Arup assessment found that while the northern boundaries of WM27 and WM28 would prevent further development, the remaining boundaries — comprising tree-lined field boundaries and Whitehall Brook — *"may also prevent further development but possibly not in the long term."* Any new boundary drawn through the site would need to be at least as strong and permanent as those existing features.

2. GREY BELT

The August 2026 NPPF formally defines grey belt (Annex B) as land in the Green Belt comprising previously developed land and/or land that, when assessed against purposes (a), (b) and (d) of GB2(1), **does not strongly contribute to any of those purposes.**

The 2015 Arup assessment rated WM27 and WM28 as making a "Significant Contribution" to Green Belt purposes — the second highest of four ratings (Major Contribution, Significant Contribution, Contribution, No Contribution). No material change has occurred since that assessment. The site is open pastoral farmland with no urbanising features. It is not previously developed land. Under the Annex E methodology:

- **Purpose (a) — checking unrestricted sprawl:** The site is open land clearly connected to the wider countryside, with strong boundaries between the settlement and the countryside. These are features Annex E identifies as making a "strong contribution."
- **Purpose (b) — preventing neighbouring towns merging:** The site forms a substantial part of the gap between Wilmslow and Alderley Edge. Development would result in a loss of visual and physical separation. These are features Annex E identifies as making a "strong contribution."

Stockton Farm is not grey belt. The Council's borough-wide Green Belt assessment must reach this conclusion if the Annex E methodology is applied properly and consistently.

We note the widespread concern expressed by other respondents to this consultation about the grey belt concept. In particular, we agree with Mr Len Harvey (Rep 1587) that *"grey belt classification assesses particular Green Belt purposes, not the full ecological or environmental value of land"* and that the Council should map biodiversity, ecological connectivity, LNRS priorities, soils, hydrology, flood risk and landscape value before any land is identified as grey belt.

We also agree with Residents of Wilmslow (Rep 1440) that *"creation of grey belt by developers offering green open spaces should not be permitted."* This is directly relevant to Stockton Farm, where the applicant in the current planning application has offered a "country park" as mitigation — a tactic that should not influence the Green Belt assessment.

Cheshire East should publish its grey belt assessment transparently so that residents can understand how the site has been scored and how it compares with other potential sites.



3. SETTLEMENT SEPARATION AND STRATEGIC GREEN GAP

Stockton Farm occupies Green Belt countryside within the gap between Wilmslow and Alderley Edge. Development of the site would advance the built edge of Wilmslow southwards into this gap.

Wilmslow Town Council has specifically requested in its representation to this consultation that the gap between Wilmslow and Alderley Edge be designated a **Strategic Green Gap**:

"WTC believes that the gap between Wilmslow and Alderley Edge should be designated a strategic green gap. The Chonar landscape is defined in the Landscape Character Assessment, a supporting document to the adopted Wilmslow Neighbourhood Plan. Its development would present a serious loss of green belt creating an urban conurbation from Alderley Edge to Bury in the North. We also maintain that Alderley Edge is a town in Planning terms."

Protect Butterfly Bank strongly supports this request. The point about Alderley Edge being a town is significant, because NPPF purpose (b) — preventing neighbouring **towns** from merging — applies with full force where two towns face each other across a narrowing gap. CPRE Cheshire made the same point in its objection to the current planning application on this site.

We also note that Residents of Wilmslow (Rep 1666) cite a **recent appeals inspector decision that upheld a refusal between Wilmslow and Alderley Edge on gap-maintenance grounds**. This demonstrates that the settlement separation function of this Green Belt is already recognised in planning decisions.

The Local Plan should assess both the contribution of the land itself and the consequences of its release for the Green Belt that would remain. Under Annex E of the August 2026 NPPF, the assessment should identify whether release or development would *"fundamentally undermine the five Green Belt purposes (taken together) of the remaining Green Belt when considered across the area of the plan."*

Particular consideration should therefore be given to whether development would:

- create or reinforce a finger of built development extending southwards from Wilmslow into presently open countryside;
- narrow the physical and perceived separation between Wilmslow and Alderley Edge;
- affect the contribution of the remaining Green Belt to Purpose B: preventing neighbouring towns from merging into one another; and
- leave the remaining Green Belt performing its purposes within a materially narrower gap.

This wider assessment is particularly important because Annex E permits Green Belt assessment areas to be subdivided into smaller units. Such subdivision should not result in the strategic function of the wider Green Belt being overlooked. Annex E identifies land as capable of making



a strong contribution to Purpose B where it forms a *"substantial part of a gap between towns"* and development would be likely to result in a loss of visual separation.

The **Call for Sites submissions map** demonstrates that multiple parcels of land have been submitted by developers across the entire Wilmslow-Alderley Edge corridor. Cheshire East should therefore assess Stockton Farm both individually and in the context of the whole Wilmslow-Alderley Edge gap, including the cumulative consequences of successive Green Belt releases within that gap and the effect upon the function of the Green Belt that would remain.

4. LANDSCAPE CHARACTER: THE CHONAR LANDSCAPE

Stockton Farm forms part of the **Chonar Landscape Character Area**, an established landscape of rolling and undulating pastoral farmland, irregular fields, mature hedgerows, abundant mature oaks, ponds and watercourses.

Wilmslow Town Council has identified the Chonar Landscape as *"a regionally significant area of green countryside"* whose development *"would present a serious loss of green belt."* The Chonar Landscape Character Assessment is a supporting document to the adopted Wilmslow Neighbourhood Plan.

The Local Plan assessment should take account of the Wilmslow Countryside Character Assessment, which identifies the distinctive characteristics and sensitivities of the Chonar landscape, together with relevant Cheshire East landscape evidence and the Wilmslow and Alderley Edge neighbourhood plans.

The assessment should consider not simply the loss of individual landscape features, but the effect of development upon the pattern, character and experience of this wider rural landscape, including views from public rights of way and the relationship between the southern edge of Wilmslow and the countryside extending towards Alderley Edge.

Landscape harm should be assessed separately from Green Belt status. A change in Green Belt classification does not remove the need to consider the character and sensitivity of the landscape itself.

5. AGRICULTURAL LAND

Stockton Farm is productive agricultural land that continues to be farmed to this day.

Agricultural land is a finite strategic resource. Multiple respondents to this consultation have argued that the Local Plan should give significant weight to food production, the viability of farming businesses, agricultural land quality, soil health, and drainage. We agree.

The August 2026 NPPF (N2) requires planning decisions to recognise the intrinsic character and beauty of the countryside. Natural England's response to this consultation (ID 1765) states that policies should *"avoid loss of Best and Most Versatile (BMV) agricultural land"* and that *"development on BMV land has irreversible adverse impact on a finite national stock."*



Agricultural land should not simply be viewed as land that is technically capable of accommodating development.

6. FLOOD RISK AND THE WILMSLOW SECTION 19 INVESTIGATION

Flood risk should be treated as a fundamental site-selection issue, not simply as an engineering matter to be resolved after land has been allocated.

Stockton Farm lies within the Whitehall Brook catchment and includes sloping land draining towards the brook valley. The August 2026 NPPF strengthens flood risk requirements through policies F4-F8, requiring site-specific flood risk assessments using "*best available information*" including climate change projections.

The surrounding area experienced significant flooding during the New Year 2024/25 flood event, serious enough to trigger Cheshire East Council, as Lead Local Flood Authority, to undertake a formal **Section 19 Flood Investigation** for Wilmslow.

That investigation is important new evidence and should form part of the evidence base used to assess Stockton Farm and other potential development sites within the Whitehall Brook catchment.

We note that Residents of Wilmslow (Rep 1707) have raised concerns about "*sewage overspill and surface water run-off*" in relation to local watercourses. Wilmslow Town Council has "*endorsed community and agency concerns about the water quality in the Bollin and Dean Rivers.*" Whitehall Brook is a tributary of the River Bollin.

In the current planning application on this site, the **Environment Agency, the Lead Local Flood Authority, and United Utilities have all submitted formal objections** on flood risk and drainage grounds. These objections constitute material evidence that should inform the Local Plan site assessment.

Before considering this site for allocation, Cheshire East should establish whether development can be accommodated safely for its lifetime without increasing flood risk elsewhere, taking account of the findings and recommendations of the Section 19 investigation; surface water; groundwater; Whitehall Brook; existing and future flood risk; climate change; and the interaction between development throughout the wider catchment.

7. THE CUMULATIVE WHITEHALL BROOK CATCHMENT

This should be a strategic Local Plan issue in its own right.

Potential development sites within the Whitehall Brook catchment should not be assessed independently of one another.

National planning policy (F4-F8) requires strategic planning for flood risk to consider the cumulative impacts of development in, or affecting, areas susceptible to flooding.



The relevant question is therefore not simply whether an individual development can capture and attenuate its own calculated runoff. The Local Plan should assess the combined effect of existing development, committed development and proposed Local Plan development throughout the Whitehall Brook catchment.

Cheshire East should understand how these sites interact as part of the same hydrological system before deciding how much additional development that catchment should accommodate.

The Wilmslow Section 19 investigation should be an important part of that assessment.

8. SEQUENTIAL APPROACH TO FLOOD RISK

The Local Plan should direct development towards locations where flood risk is lowest (F5).

Stockton Farm should therefore be compared with reasonably available alternative sites before any allocation is considered.

The availability of engineered drainage and attenuation should not replace the fundamental strategic question: **Is there a reasonably available location for this development where flood risk is lower?**

This question is particularly important when Cheshire East has numerous alternative sites submitted through the Call for Sites process. Cheshire East maintains a statutory Brownfield Land Register identifying previously developed sites available for housing — these should be assessed and prioritised before Green Belt land is considered.

9. BROWNFIELD-FIRST SEQUENTIAL APPROACH

The August 2026 NPPF and CEC's own scoping consultation documents (paras 3.15 and 5.17) commit to prioritising brownfield land. The sequential approach set out in national policy is clear: brownfield first, then grey belt, then higher-performing Green Belt only as a last resort.

Wilmslow Town Council has criticised this consultation for giving *"significant copy and emphasis to greenbelt development"* when brownfield should be the priority, and has called for a **proactive brownfield audit**.

Many respondents to this consultation have demanded that all brownfield, regeneration, and urban capacity alternatives must be fully exhausted before any Green Belt release is considered. Protect Butterfly Bank agrees.

Before Stockton Farm — a site that makes a "Significant Contribution" to Green Belt purposes — is considered for allocation, Cheshire East should demonstrate through published evidence that all realistic brownfield, regeneration, urban capacity and non-Green Belt alternatives have first been fully investigated.



10. ECOLOGY, CONNECTIVITY AND THE NATURE NETWORK

The site should be assessed as part of a connected ecological network, rather than as a collection of individual habitats capable of being retained, replaced or compensated for separately.

The August 2026 NPPF strengthens ecology protections significantly:

- **N2(1)(f)** explicitly requires planning decisions to *"support the recovery of priority and threatened species, including through the provision of features such as swift bricks, bat boxes, and hedgehog highways."*
- **N6(2)** states that development resulting in the loss or deterioration of **irreplaceable habitats** (including ancient woodland and veteran trees) *"should be refused, unless there are wholly exceptional reasons."*

Natural England's response to this consultation (ID 1765) is particularly relevant to this site. Natural England:

- Specifically references the **Bollin to Mersey Nature Recovery Partnership** — one of twelve NRPs in England — which covers the ecological corridor that Butterfly Bank and Whitehall Brook feed into
- Requires appropriate policies for the protection of **ancient woodland and veteran trees**
- States that the **Local Nature Recovery Strategy** should inform site selection
- Requires **compensatory improvements** to environmental quality where Green Belt land is released

The network of mature hedgerows, field trees, ponds, grassland and watercourses at Stockton Farm provides habitat and connectivity across the wider countryside. Cheshire East's own ecological evidence should be used to assess the role of the site within the wider ecological network, including its function for habitat connectivity and as ecological stepping stones between habitats.

Butterfly Bank woodland contains mature oak trees, some of considerable age. Veteran trees within groups G13 and G15 on the site have been identified as inadequately protected in the current planning application. Veteran trees are explicitly classified as irreplaceable habitats under the August 2026 NPPF (N6(2)), which requires that development resulting in their loss or deterioration should be refused.

In the current planning application, **CEC's own ecology officer** has identified pre-determination blockers relating to barn owl, great crested newt, and bat surveys. Incomplete ecological evidence should not be carried forward as an assumption that constraints can be resolved — it should be treated as a reason for caution in site selection.

Particular consideration should be given to mature and veteran trees; priority hedgerows (11 of 18 hedgerows on site are classified as "important" under the Hedgerow Regulations 1997);



ponds and watercourses; Whitehall Brook and its riparian corridor; habitat connectivity and fragmentation; ecological stepping stones; protected and priority species, including bats, birds, amphibians, hedgehogs and other species dependent upon connected habitats; biodiversity net gain; and the relationship between the site and the wider Cheshire East ecological network and the Bollin to Mersey NRP.

Any assessment of potential allocation should therefore consider whether development would fragment or weaken this network, even where individual habitat features are proposed to be retained.

11. TREES, HEDGEROWS AND THE LANDSCAPE-ECOLOGY NETWORK

Stockton Farm contains a network of mature field trees, including numerous mature oaks, together with established hedgerows that contribute simultaneously to the site's landscape character, ecological connectivity and historic field pattern.

These features should therefore not be assessed simply as individual trees or lengths of hedgerow that can be retained within a housing layout.

The Local Plan assessment should consider their combined landscape and ecological function, including their contribution to the distinctive Chonar landscape; the established pattern and enclosure of the fields; habitat connectivity and ecological stepping stones; wildlife movement and bat foraging routes; relationships between trees, hedgerows, ponds and watercourses; root protection requirements; changes in ground levels and drainage; lighting and urbanisation effects; and the long-term consequences of placing development immediately alongside retained landscape features.

The assessment should also establish whether this existing landscape and ecological network can genuinely coexist with the infrastructure necessary to develop the site, including roads, sewers, drainage, utilities, earthworks, retaining structures, changes in levels and emergency access.

The question should therefore not simply be "can these trees and hedgerows be retained?" It should be: **"Can the landscape and ecological functions provided by this established network be retained successfully once all of the infrastructure and urbanising effects necessary for development are taken into account?"**

Environmental constraints should not simply be assumed capable of resolution through detailed design after a site has already been allocated.

12. HIGHWAYS, ACCESS AND SUSTAINABLE TRANSPORT

The Local Plan should assess whether safe and suitable access can realistically be achieved and the cumulative effect of additional development upon the surrounding highway network.



For Stockton Farm this should include Welton Drive, Stockton Road and the wider local road network, together with emergency access, pedestrian and cycle connectivity and realistic opportunities to reduce dependence on private cars.

Active Travel England stated in its response to this consultation (ID 1552) that sites should be assessed on their ability to "*maximise accessibility to key destinations by active travel and public transport*" and to "*minimise reliance on private car travel.*" The Butterfly Bank site has no bus service on Welton Drive or Stockton Road and no cycling infrastructure.

Residents of Wilmslow (Rep 1506) confirm that while Wilmslow has good national rail connectivity, **local connectivity is poor** — travel to Macclesfield, Knutsford, hospitals and town centres relies too heavily on private cars, and bus services are infrequent and unreliable.

13. SUSTAINABLE LOCATION AND WILMSLOW RAILWAY STATION

The August 2026 NPPF (L3) sets a minimum expectation of 35 dwellings per hectare for sites within 800m of a well-connected railway station. Any reliance upon Wilmslow railway station when assessing Stockton Farm should therefore consider the actual relationship between the site and the station, including realistic walking distance, routes, accessibility and connectivity.

Wilmslow Town Council has noted that "*the lack of accessible access to Wilmslow station, on the West Coast Main Line, is a constraint on growth and access to East Cheshire.*"

The fact that a development site and railway station are within the same settlement should not, by itself, establish that the site is sustainably located in relation to that station.

14. INFRASTRUCTURE

The Local Plan should consider the cumulative infrastructure consequences of development across Wilmslow rather than assessing individual sites in isolation.

Allocation should follow evidence that the infrastructure necessary to support the level of development proposed can realistically be delivered. This should include schools, healthcare, highways, public transport, utilities, sewerage, drainage and community infrastructure.

15. WILMSLOW'S EXISTING HOUSING CONTRIBUTION

Residents of Wilmslow (Rep 1668) note that the previous Local Plan inspector imposed a **125% increase** above CEC's assessed need for the period 2010-2030 — the biggest increase across the borough — and that approved allocated sites in Wilmslow remain undelivered and will provide approximately **2,000 homes** plus an enterprise zone.

The spatial distribution of housing in the new Local Plan should recognise that Wilmslow has already made a substantial contribution to housing supply. Further significant allocation on Green Belt land would be unjustified without clear evidence that Wilmslow's fair share has not already been met.



16. HOUSING MIX

Wilmslow Town Council and Residents of Wilmslow have both raised concerns that recent housing development in Wilmslow has been dominated by large 4-5 bedroom executive homes aimed at regional demand, not local housing need.

The Wilmslow Neighbourhood Plan contains policies on housing design and housing mix. WTC states that *"the current regulations regarding housing mix do not deliver the housing mix that Wilmslow needs to meet local housing need."*

If Stockton Farm is assessed for potential allocation, the Local Plan should consider whether the type of housing likely to be delivered on this site would meet identified local need — particularly for smaller homes, affordable homes, and bungalows — rather than simply adding to an oversupply of larger market housing.

17. THE WILMSLOW NEIGHBOURHOOD PLAN

The adopted Wilmslow Neighbourhood Plan contains policies directly relevant to Stockton Farm, including:

- **Policy CR3:** Local Green Space designation covering the Welton Drive field, which forms part of the site access. Under the August 2026 NPPF (HC8), Local Green Space is managed consistently with Green Belt policy and **grey belt provisions do not apply**.
- **The Chonar Landscape Character Assessment:** a supporting document identifying the distinctive character and sensitivity of the landscape within which Stockton Farm sits.
- **Housing mix and design policies:** setting locally specific requirements that WTC says are being ignored.

Wilmslow Town Council has asked that the Neighbourhood Plan and its supporting documents be recognised as a Supplementary Planning Document in both the interim period and the new plan. Cheshire Community Action (Rep 1370) has similarly argued that neighbourhood plans *"should be treated as an important foundation for the new Local Plan"* and that the new plan should *"complement neighbourhood plans rather than duplicate or unintentionally undermine them."*

The Local Plan assessment of Stockton Farm should give appropriate weight to the Wilmslow Neighbourhood Plan and its evidence base.

18. GOLDEN RULES

The August 2026 NPPF (GB8) establishes "Golden Rules" for any inappropriate development approved on Green Belt land, including a requirement for **50% affordable housing**. This is a material consideration in assessing the viability and deliverability of any Green Belt site. The current planning application on this site offered only 45% affordable housing — below the new national requirement.



19. ALTERNATIVE SITES AND THE CUMULATIVE PICTURE

Numerous potential development sites have been submitted around Wilmslow and elsewhere in Cheshire East through the Call for Sites process.

The **site submissions map** demonstrates that Wilmslow is virtually surrounded by submitted parcels — to the west, south, and east, with multiple submissions filling the gap between Wilmslow and Alderley Edge. The cumulative scale of these submissions reinforces the case for:

- A **Strategic Green Gap** designation between Wilmslow and Alderley Edge, as requested by Wilmslow Town Council
- **Cumulative impact assessment** before any sites in this corridor are considered for allocation
- A **transparent and consistent methodology** for comparing all submitted sites

Before Green Belt land at Stockton Farm is considered for allocation, Cheshire East should demonstrate through a transparent and consistent methodology how it compares with reasonable alternatives. Comparison should include Green Belt impact, flood risk, landscape, ecology, agricultural land quality, sustainable transport, infrastructure, accessibility and deliverability.

Site selection should be driven by evidence rather than simply by which landowners have made land available.

20. DELIVERABILITY AND CUMULATIVE CONSTRAINTS

The assessment of deliverability should consider the site's constraints together, rather than individually.

For Stockton Farm these potentially include flood mitigation, drainage, highways, earthworks, utilities, tree protection, hedgerow protection, ecology, biodiversity net gain, accessible green space, 50% affordable housing (Golden Rules) and long-term management.

A site may appear capable of overcoming each individual constraint when considered separately but become significantly more difficult when all requirements have to be accommodated within the same development.

The Local Plan should therefore establish the realistic developable capacity of the site after these requirements are taken into account.

21. RELATIONSHIP WITH THE CURRENT PLANNING APPLICATION

Part of the land promoted through the Call for Sites is also subject to a planning application for housing (25/3735/FUL, currently under revision by the applicant).

The Local Plan assessment should take account of relevant evidence generated through that application, including technical assessments and responses from statutory consultees. That application has generated **formal objections from the Environment Agency, the Lead Local**



Flood Authority, United Utilities, Manchester Airport, CEC Environmental Protection, CEC Ecology, Wilmslow Town Council, Wilmslow Civic Trust, CPRE Cheshire, Cheshire Fire & Rescue, and the Public Rights of Way team, as well as many hundreds of individual resident objections.

If significant unresolved constraints are identified through the planning application, those matters should inform the subsequent assessment of the site's suitability, achievability and deliverability through the Local Plan.

Equally, inclusion within the Call for Sites process should not influence determination of the current planning application. They are separate planning processes.

22. EVIDENCE BEFORE ALLOCATION

Protect Butterfly Bank asks Cheshire East to adopt a straightforward principle: **ASSESS FIRST. ALLOCATE SECOND.**

Before Stockton Farm is considered for allocation, Cheshire East should have sufficient evidence to understand its Green Belt function; grey belt status (applying the Annex E methodology against the 2015 Arup baseline); flood risk; cumulative Whitehall Brook catchment effects; landscape sensitivity; ecological importance and relationship to the Bollin to Mersey NRP; agricultural land classification; infrastructure requirements; sustainable accessibility; realistic developable capacity; and overall deliverability.

These matters should be understood before the principle of development is established through a Local Plan allocation, rather than being left for a future planning application to resolve.

OUR REQUEST TO CHESHIRE EAST

Protect Butterfly Bank asks that Cheshire East Council:

1. Transparently assesses Stockton Farm against the August 2026 NPPF Green Belt (GB1-GB8) and grey belt (Annex E) policies, using the 2015 Arup assessment as the baseline.
2. Assesses Stockton Farm both individually and in the context of the remaining Green Belt within the Wilmslow-Alderley Edge gap, including the cumulative consequences of Green Belt release within that gap.
3. Gives serious consideration to Wilmslow Town Council's request for a **Strategic Green Gap** designation between Wilmslow and Alderley Edge.
4. Incorporates the Wilmslow Section 19 Flood Investigation into the Local Plan evidence base.
5. Undertakes a strategic catchment-wide assessment of cumulative flood risk within the Whitehall Brook catchment.
6. Applies the sequential approach (F5) to the location of development before allocating land where flood risk is a material consideration.



7. Properly assesses landscape, ecology, trees, hedgerows, watercourses and habitat connectivity, taking account of Natural England's guidance on irreplaceable habitats and the Bollin to Mersey Nature Recovery Partnership.
8. Tests highways, infrastructure, sustainable transport and realistic accessibility, taking account of Active Travel England's site assessment requirements.
9. Demonstrates through published evidence that all brownfield, regeneration and non-Green Belt alternatives have been fully investigated before this Green Belt site is considered.
10. Compares Stockton Farm consistently and transparently against reasonable alternative sites.
11. Assesses the cumulative effect of all site constraints — including the 50% affordable housing Golden Rule — when considering realistic development capacity and deliverability.
12. Takes account of relevant technical evidence emerging through the current planning application (25/3735/FUL), including the objections from statutory consultees.
13. Gives appropriate weight to the Wilmslow Neighbourhood Plan and its supporting documents, including the Chonar Landscape Character Assessment and the Local Green Space designation at Welton Drive.
14. Considers whether Wilmslow's existing housing contribution (~2,000 homes plus Alderley Park) represents its fair share before allocating further Green Belt land.
15. Publishes sufficient evidence for residents to understand and scrutinise why any site has been selected or rejected.

CONCLUSION

The purpose of this representation is to ensure that the new Local Plan begins with the right evidence and asks the right questions.

Stockton Farm / Butterfly Bank should not be considered simply as an available piece of land capable of accommodating a particular number of houses.

It must be considered as part of a wider landscape, Green Belt, ecological network, infrastructure system and, critically, the Whitehall Brook catchment. It sits within the Chonar Landscape Character Area, a regionally significant area of countryside that Wilmslow Town Council has asked to be protected through a Strategic Green Gap designation. It adjoins Butterfly Bank woodland, which contains veteran trees classified as irreplaceable habitat under the August 2026 NPPF. It feeds into the Bollin to Mersey Nature Recovery Partnership corridor identified by Natural England as one of only twelve such partnerships in England.

The 2015 Arup assessment — which Wilmslow Town Council says should be at the cornerstone of all site assessments — rated this land as making a "Significant Contribution" to Green Belt purposes. The August 2026 NPPF's formal grey belt definition and Annex E methodology, properly applied, confirm that this site is not grey belt.



The current planning application on this site has generated formal objections from the Environment Agency, the Lead Local Flood Authority, United Utilities, and multiple other statutory consultees. The recent Wilmslow Section 19 Flood Investigation demonstrates why the wider catchment context matters.

Before any decision is made about whether Stockton Farm should progress towards allocation, Cheshire East should establish through an up-to-date, transparent and comparative evidence base whether this is an appropriate and sustainable location for development in the first place.

Protect Butterfly Bank | Local Plan Scoping Consultation | August 2026