

New Local Plan — Scoping Consultation

Representation submitted by Kevin Griffiths, Knutsford

Respondent: Kevin Griffiths, Knutsford, Cheshire

Contact details: My postal address and email address are held with my consultation account registration and are not reproduced here.

Capacity: Private individual and resident of Knutsford

Submitted: 31 August 2026 — before the deadline of 5pm, 1 September 2026

Notification: I wish to be notified of the publication of the Plan Content and Evidence consultation, the Proposed Local Plan consultation, the submission of the plan for examination, and the adoption of the plan.

1. Introduction and purpose of this representation

I am a resident of Knutsford. I welcome the opportunity to comment at the scoping stage and I am grateful to the Council for consulting before the plan is drafted rather than afterwards.

I understand that this consultation asks what the new local plan should contain and how the Council should engage during its preparation. It does not consult on individual sites, and no sites have been proposed for allocation. This representation is framed accordingly. It does not object to any particular parcel of land. Instead it asks for specific policies, specific tests and specific pieces of evidence to be built into the plan, so that when growth is distributed in 2027 and sites are identified in 2028 there is a proper framework against which those decisions can be made and judged.

My concerns are threefold: the cumulative scale of development being directed at Knutsford; the capacity of the town's supporting infrastructure to absorb it; and the risk of further damage to nature sites around the town and, in particular, to the connections between them. Each is addressed below, and each is converted into a numbered request.

Summary of requests

I ask that the new local plan and its supporting evidence include the following. Each request is keyed to the paragraphs of the scoping document to which it relates.

- A. Growth, distribution and cumulative capacity — requests R1 to R5
- B. Infrastructure — requests R6 to R11
- C. Natural environment and nature recovery — requests R12 to R16
- D. Evidence base — request R17
- E. Engagement — requests R18 to R20

2. Context: why Knutsford warrants specific attention

The scoping document records that the Government's revised standard method sets Cheshire East's local housing need at 2,530 homes a year, "a 41% increase compared to the current local plan requirement (1,800 homes per year)". I accept that this figure is set nationally and is not a matter the Council can simply decline to plan for. My representation is therefore not about the total. It is about where that total is directed, in what sequence, and subject to what safeguards.

Knutsford is a Key Service Centre under Policy PG2 of the adopted Local Plan Strategy, and it is tightly constrained by Green Belt. Under the current plan the town was allocated approximately 960 homes across five sites (LPS 36A Northwich Road, LPS 37 Parkgate Lane, LPS 36AB Manchester Road West, LPS 36AC Manchester Road East, and LPS 38 at Longridge), of which several are under construction and the remainder hold outline permission. The town also has a made Neighbourhood Plan, approved at referendum in March 2019, which forms part of the development plan and carries a considerable evidence base of its own.

Views will differ on whether that represents a large or a small share of the borough's growth, and I do not ask the Council to adopt my view of it. I ask instead that the question be settled by published evidence rather than by assertion on any side. If the plan's evidence base sets out, settlement by settlement, what has been allocated, what has been completed and what remains committed since 2017, then the fairness of the distribution proposed in the new plan can be judged on the figures. That is a request the Council can accept whatever its own view of Knutsford's past contribution, and I make it in that spirit.

The Council's published site submissions layer shows that land has now been promoted on effectively every side of the town — housing to the north and north-west, east towards Mobberley, south-east towards Ollerton, and south, together with employment parcels and a very large mixed-use promotion to the west across Tabley. I recognise, and the Council is clear, that these are landowner and promoter offers rather than council proposals, that "the submission of a site to the council does not necessarily mean that it will be included in the new local plan", and that many will not be taken forward. I do not treat them as proposals. I cite them for one reason only: they demonstrate that the development pressure on Knutsford is cumulative and comes from all directions at once. That is precisely the situation in which a plan needs an explicit cumulative-capacity test, because a series of individually defensible decisions can produce a collectively indefensible outcome.

3. Part A — Growth, distribution and cumulative capacity

Relates to paragraphs 5.2–5.7 (vision and objectives; planning for growth), 5.15–5.18 (Green Belt), 5.20–5.23 (settlement hierarchy) and 5.24–5.26 (spatial distribution).

- R1** The vision, aims and objectives should include an explicit objective that growth is infrastructure-led — that is, that the timing and location of development is governed by the capacity of supporting infrastructure — together with a measurable outcome against which that objective can be monitored. Paragraph 5.4 invites views on priority matters for the vision and objectives; this is mine.
- R2** The spatial distribution of growth should be tested against the absorptive capacity of each settlement, not derived solely from its position in the hierarchy or from a proportionate share of the borough total. I ask that the plan contain a cumulative capacity assessment at settlement level, covering highway network capacity, school places, primary care capacity, wastewater and water supply headroom, green space provision and community facilities, and that the distribution of growth be justified against it.
- R3** The baseline for judging what further growth is proportionate should count completions and extant commitments since the adoption of the current plan, and those figures should be published for each settlement. A distribution exercise that begins from a clean sheet, and asks only what each town's share of the new total should be, takes no account of what each town has already delivered. Whichever way the figures fall for any particular town, the exercise should proceed on the evidence.
- R4** The plan should apply a genuinely sequential approach to land: brownfield and urban capacity first, then non-Green-Belt greenfield, and only then Green Belt release. Where grey belt assessment is used, I ask that the assessment methodology and its outputs be published and consulted upon in full at the 2027 stage, rather than appearing for the first time alongside proposed allocations in

2028. The public cannot meaningfully comment on a Green Belt release if the reasoning that produced it is only disclosed at the same moment as the conclusion.

- R5** The review of the settlement hierarchy should be based on the actual current capacity of services, not merely on the presence of a facility. A town with a secondary school at capacity, GP lists closed or under strain and a constrained highway network is not, in any practical sense, as capable of absorbing growth as a raw count of its facilities would suggest. I ask that the hierarchy methodology explicitly distinguish between the existence of a service and its available headroom.

4. Part B — Infrastructure

Relates to paragraphs 5.91–5.95 (transport and infrastructure), 5.104–5.117 (health and wellbeing), 5.118–5.124 (recreation and community facilities) and 5.139–5.145 (evidence base).

Residents' experience of the current plan period in Knutsford has been that housing arrives first and infrastructure arrives late, partially, or not at all. Contributions secured through section 106 are not the same thing as delivered capacity, and a policy framework that treats them as equivalent will reproduce the same outcome over the next plan period at a substantially larger scale.

- R6** The plan should contain an infrastructure-first policy: a requirement that the transport, education, primary care, green space and wastewater capacity necessary to serve a development is demonstrably available or firmly committed before occupation, secured by phasing conditions where necessary. I ask that this be a plan policy with teeth, not an aspiration in supporting text.
- R7** The Infrastructure Delivery Plan supporting the new local plan should be disaggregated to settlement level and published alongside the 2027 Plan Content and Evidence consultation, so that residents of each town can see what is proposed for their town and whether it is deliverable and funded. A borough-wide schedule does not allow that judgement to be made.
- R8** I ask that the following evidence be commissioned or updated and published as part of the plan's evidence base, with Knutsford identified separately within each:
- Transport capacity and modelling for the Knutsford network, including the A50 and A537 corridors through and around the town, M6 Junction 19, known local pinch points including Adams Hill, and the interaction between local traffic, Tatton Park visitor traffic and strategic through-traffic;
 - Rail capacity and station accessibility on the Mid-Cheshire line, and the practical scope for modal shift given current service frequency;
 - School place forecasting for Knutsford primary and secondary provision over the full plan period, mapped by catchment rather than reported as a town-wide total, with the assumptions stated;
 - Primary care capacity — GP list sizes, premises capacity and expansion potential — prepared jointly with the relevant Integrated Care Board;
 - Wastewater, sewerage and water supply capacity, prepared jointly with United Utilities, including the headroom at the receiving works and the condition of the network, and the implications for watercourses including Birkin Brook and the Bollin;
 - Green space, sport and recreation provision measured against the standards the plan proposes to adopt;
 - Town centre capacity, including traffic, parking, servicing and pedestrian movement.

School places must be within walking distance of the housing they serve

School capacity cannot meaningfully be assessed for a town as a whole. Primary schools serve the housing immediately around them, and a surplus place on the far side of a congested town is not, in any practical sense, a place at all. Where the arithmetic balances at town level but the geography does not, the result is not a shortage of places — it is a shortage of places people can walk to, and the difference is measured in car journeys.

Knutsford illustrates the problem precisely. Most of the town's primary school capacity lies on the Mobberley side, while capacity on the Tabley side is limited. The consequence is entirely predictable and observable twice a day: parents drive their children from the Tabley side of the town to schools on the Mobberley side, funnelling through the pinch point at Adams Hill. The congestion this produces is not a consequence of too few school places in Knutsford. It is a consequence of the places being in the wrong part of the town relative to the housing.

Allocating further housing on the western side of the town without matching primary capacity in the same part of the town would deepen a problem that already exists, and would do so in a way that a town-level capacity assessment would not even detect.

R9 The plan should require primary school capacity to be assessed and provided at catchment level, within walking distance of the housing it serves, and should make walkable school access an explicit criterion in the selection and phasing of housing sites — not a matter left to be resolved after allocation. Education evidence supporting the plan should be presented spatially, showing capacity mapped against proposed housing locations, rather than as a single figure for each town.

The capacity of a historic town centre is a fixed constraint

Knutsford town centre is historic and characterful, and it is one of the reasons people value the town. It was not built for modern vehicle traffic and it cannot comfortably accommodate it. The centre is congested, parking is limited, and vehicles and pedestrians contend for the same constrained space. The town has five conservation areas, and the physical form of the centre — street widths, frontages, historic buildings — is not something that can be enlarged.

This matters for plan-making because it is a constraint of a different kind from those usually assessed. It cannot be mitigated by a contribution from an individual development, and it does not appear in a highway capacity model of the strategic network. It is a hard ceiling on how much additional vehicle movement the town can absorb before the qualities that make the centre worth protecting are eroded.

R10 The plan should treat the capacity of historic town centres as a constraint on the distribution of growth, and not solely as a matter for town centre policy. For Knutsford I ask that the evidence base include a town centre movement and public realm study covering traffic, parking, servicing, air quality and pedestrian priority, and that its findings inform how much additional growth is directed to the town.

R11 The plan should protect existing community facilities and should require that development of any significant scale delivers community infrastructure proportionate to the population it creates, on site or within reasonable walking distance, and delivered to a timetable tied to occupation.

5. Part C — Natural environment and nature recovery

Relates to paragraphs 5.8–5.14 (identifying and assessing sites) and 5.96–5.103 (natural environment).

This is the part of my representation on which I would most welcome a substantive response, because I believe there is a clear gap in the scoping document — and because the current plan period has already produced a case study of what that gap costs.

The Cheshire and Warrington Local Nature Recovery Strategy was published in 2025 by the Cheshire and Warrington Local Nature Partnership, with Cheshire East Council as one of the responsible authorities. It describes itself as a statutory document that local planning authorities must have regard to in planning decisions, and which should inform local planning policy, and it states that local planning authorities should use it to "guide where and how development should take place". The strategy records that Cheshire has lost more species than any other rural English county since 1950.

The strategy's Local Habitat Map has three components: Core Local Nature Sites (areas of particular importance for biodiversity); Opportunity Areas for Nature Recovery, described as the best locations to create new habitat and to "connect habitats with corridors and stepping stones"; and mapped actions

under eight habitat and theme priorities. The second component — connectivity — is the one that matters most here, and it is the one that site-by-site decision-making is least able to protect.

Knutsford is substantially encircled by mapped Opportunity Areas for Nature Recovery, with Core Local Nature Sites immediately adjacent to the built edge of the town and running north through the Tatton corridor. At a single point on the town's north-western edge the Local Habitat Map returns ten overlapping features, including a Core Local Nature Site and multiple mapped actions under the Woodlands, Hedgerows and Trees priority. Reading the Local Habitat Map and the Council's own site submissions layer together, land promoted through the call for sites falls within those mapped areas.

The scoping document, so far as I can see, does not commit the new local plan to translating the LNRS Local Habitat Map into its own policies map or into its site assessment methodology. That omission matters. If connectivity is not a constraint at the plan-making stage, it becomes a matter to be argued site by site at application stage, at which point the cumulative severing of a network is effectively impossible to resist — each individual severance is small, and the network is only lost in aggregate.

R12 The new local plan should embed the Cheshire and Warrington LNRS Local Habitat Map — Core Local Nature Sites, Opportunity Areas for Nature Recovery, and mapped connectivity — in its policies map, and should incorporate it as an explicit criterion within the site assessment methodology described at paragraphs 5.8 to 5.14. Sites that would sever or degrade mapped connectivity should be identified as such at the sifting stage, with the reasoning published.

R13 The plan should include a policy protecting ecological connectivity and green corridors as such, distinct from and additional to policies protecting designated sites. For Knutsford there is a ready-made and locally-owned evidence base: the Knutsford Green Corridors study prepared for the Neighbourhood Plan identifies 34 corridors — 10 principal, 4 secondary, 3 aspirational and 17 urban — connecting Tatton Park, The Heath, The Moor, Dog Wood, Sanctuary Moor, St John's Wood, Booths Mere, Windmill Wood, Bluebell Wood and Birkin Brook. The three aspirational corridors were identified specifically as being needed to mitigate the impacts of development. I ask that the new local plan recognise and secure them.

R14 The plan should be supported by a strategic-level cumulative ecological assessment for Knutsford, and the Habitats Regulations Assessment should consider Knutsford growth in the round rather than site by site. Rostherne Mere — a Site of Special Scientific Interest, National Nature Reserve and Ramsar site of international importance — lies north of the town at the northern end of the Tatton estate; the meres and parkland of Tatton Park lie immediately on the town's northern edge and already receive 700,000 to 800,000 visitors a year; and Booths Mere Local Wildlife Site and Birkin Brook constrain land to the east. Recreational pressure, water quality, surface water run-off and nutrient loading from a further substantial increment of housing are cumulative effects that only a strategic assessment can capture.

A lesson from the current plan: LPS 38 at Longridge

The Council does not need to look far for evidence of what happens when a site is allocated before its ecological value has been properly established. It happened in Knutsford during the current plan period, and the appeal decision setting out the consequences is a matter of public record.

LPS 38 was allocated in the current Local Plan Strategy for around 225 homes. After allocation, the land was found to qualify as a Local Wildlife Site. A site needs to meet only one of the selection criteria to qualify; the Inspector who later determined the appeal recorded that this site meets eight, and that such an occurrence on a single site is very unusual. He also recorded that the site sits at the centre of a group of ecologically important sites connected by wildlife corridors identified in the Knutsford Neighbourhood Plan — principal corridors along the northern and southern boundaries and through the middle of the site, and a secondary corridor linking it westwards to St John's Wood, an ancient woodland — and that there is evidence those corridors have been in continuous existence for hundreds of years.

The decisive point is this. It was common ground between the Council and the appellants that the ecological baseline of the site had not changed since allocation. The wildlife value was not something that arrived later. It was there all along, and the allocation process simply failed to identify it.

Cheshire East Council refused planning permission. On appeal (reference APP/R0660/W/24/3347883, decided 9 December 2024) permission was granted, notwithstanding the Inspector's finding that significant harm to the Local Wildlife Site would remain and that around 40% of it would be lost. The allocation did much of the work in that outcome:

- The argument that the housing could be built elsewhere, avoiding the harm, was answered on the basis that the allocation had already been through the local plan process and had been found to be a preferred site in overall planning terms.
- The protected species test was satisfied on the basis that, the site being allocated for housing in the local plan, there was an overriding public interest in the development proceeding.
- When it was argued at the inquiry that the site should not have been allocated at all, the Inspector's answer was that "It is not my role to review its inclusion within the development plan."

It is also worth noting that none of this was driven by a housing shortfall. The Inspector recorded that the Council could demonstrate an 11.68-year supply of housing land, far above the five-year minimum. The allocation alone was sufficient.

The lesson is not that the Inspector erred. On his own account he was applying the development plan as he found it. The lesson is that an allocation is, in practice, close to determinative — and that evidence which emerges after allocation, however compelling, arrives too late to be acted upon. A plan that allocates first and surveys afterwards places the cost of its own omissions on the habitats concerned, and leaves both the Council and its residents without a remedy.

R15 Every candidate site must be subject to a proper ecological assessment before it is allocated, not after.

I ask that the site assessment methodology require, for each site taken forward, a field-based ecological survey covering habitats, protected and priority species, and the site's role in habitat connectivity; that the survey be published as part of the evidence base at the point the site is proposed; that sites be screened against the Local Wildlife Site selection criteria and against the LNRS Local Habitat Map before allocation; and that where a site's ecological value cannot be established, it is not allocated until it has been assessed. The experience of LPS 38 shows that this cannot safely be deferred to the application stage.

R16 Biodiversity net gain should be required to be delivered on site, or failing that within the same ecological network or the relevant LNRS Opportunity Area, in preference to being exported to a different part of the borough. The LPS 38 decision is instructive here too: off-site compensation was accepted as adequate in metric terms, while the Inspector accepted that the designated site itself would still suffer significant harm. Net gain that is numerically satisfied elsewhere does nothing for the network it was supposed to compensate, and over a plan period it will hollow out precisely the connectivity the LNRS exists to rebuild.

6. Part D — Evidence base

Relates to paragraphs 5.139–5.145.

R17 Evidence base documents should be published as they are completed, rather than being held back and released in bulk at each consultation point. A six-week consultation window is not sufficient time for residents to absorb a large body of technical evidence and respond to it, and staged publication would materially improve the quality of the responses the Council receives.

7. Part E — Engagement strategy

Relates to Section 6, and in particular paragraphs 6.40–6.43 (stage-based engagement), 6.44–6.45 (recording and reporting) and 6.51–6.56 (engaging with site promoters).

- R18** At the 2027 Plan Content and Evidence consultation, I ask that material be published at town level — showing the growth options being considered for each settlement and their infrastructure and environmental implications — and not solely as borough-wide totals and policy principles. Residents can only respond meaningfully to a proposition they can see the local consequences of. If town-level options are not published in 2027, the first genuine opportunity for residents to engage with the scale of change proposed for their town will be the 2028 draft plan, by which point the strategy will in practice be settled.
- R19** The engagement strategy sets out a structured process for engaging with site promoters. I ask that communities and town and parish councils be offered engagement of comparable structure, frequency and formality. Where the Council meets promoters to discuss sites, I ask that a record of those meetings be published, in the interests of the transparency the strategy commits to at paragraphs 6.33 to 6.34.
- R20** Two points of process. First, I ask the Council to explain how the new local plan will be reconciled with the Spatial Development Strategy being prepared by the Cheshire and Warrington Combined Authority, with which the local plan must be in general conformity, and how residents will be able to influence the SDS — since a strategy prepared above the borough may in practice determine how much growth is directed to well-connected northern towns such as Knutsford. Second, in the analysis and summarising of representations, I ask that individual substantive points be recorded and responded to individually rather than aggregated into broad themes, and that the method used to analyse and summarise representations be set out openly. A point that is made once, precisely, should not disappear because it was not made by many people in the same words.

8. Conclusion

Nothing in this representation asks the Council to plan for fewer homes than the Government's standard method requires, and nothing in it objects to a particular site. What it asks for is that the new local plan be built with the tests, the evidence and the mapping needed to make sound decisions later — an infrastructure-first policy with real force, a cumulative capacity test applied at settlement level, school and town centre capacity assessed where people actually experience them, and the Local Nature Recovery Strategy's habitat map built into the plan's policies and its site assessment, rather than sitting alongside the plan as a document the Council is required only to "have regard to".

Above all, the plan should survey before it allocates. The LPS 38 appeal decision is the clearest possible demonstration of what follows when it does not: an allocation made without adequate ecological evidence proved, in the end, impossible to unmake, and the harm was found to be justified by the allocation itself. That should not happen twice.

These safeguards are cheap to insert now and very expensive to retrofit in 2028. I would welcome confirmation that this representation has been registered, and I ask to be notified of the subsequent stages of the plan's preparation as set out at the head of this document.

Kevin Griffiths

Knutsford, Cheshire

Sources relied on: Cheshire East new local plan scoping consultation, Sections 3, 4, 5 and 6 (localplan.cheshireeast.gov.uk); Notice of Scoping Consultation; Cheshire East Local Plan Strategy Policy PG2; Cheshire East site submissions layer; Knutsford Neighbourhood Plan and its Green Corridors evidence paper; Cheshire and Warrington Local Nature Recovery Strategy and Local Habitat Map (cheshirelnp.co.uk); Appeal Decision APP/R0660/W/24/3347883, Longridge, Knutsford (Planning Inspectorate, 9 December 2024).