

To: Spatial Planning Team, Cheshire East Council

Subject: Formal Objection to SHELAA Land Submission: 291.03-Hectare Area, around Ashley (12 adjoining sites totalling 291.03 hectares)

Formal Representation

I am writing to formally register my objection to the inclusion and consideration of the 291.03-hectare land submission surrounding Ashley in the Cheshire East Strategic Housing and Economic Land Availability Assessment (SHELAA) and Local Plan review (12 adjoining sites totalling 291.03 hectares).

This site is fundamentally unsuitable for strategic development. Below are the key planning policy grounds demonstrating why this submission directly conflicts with national and local planning frameworks.

1. Incompatibility with Green Belt Policy & Failure of "Grey Belt" Criteria

- **"Wash-Over" Green Belt Designation:** The entire parish of Ashley is designated as "wash-over" Green Belt under **Policy PG 3 (Green Belt)** of the *Cheshire East Local Plan Strategy (CELPS)*. This status confers maximum protection to preserve the open, rural character of settlements surrounded by sensitive countryside.
- **Strategic Buffer:** Ashley forms the narrowest remaining green buffer between Greater Manchester (Trafford/Hale/Altrincham) and the towns and villages of Cheshire East (Mobberley/Knutsford). Development here would directly breach core Green Belt purposes defined in **Paragraph 143 of the National Planning Policy Framework (NPPF)**—specifically Purpose (a) to check unrestricted urban sprawl, Purpose (b) to prevent neighbouring towns from merging, and Purpose (c) to safeguard the countryside from encroachment.
- **Failure of "Grey Belt" Tests:** Under revised national planning guidance, Green Belt land can only be released if it qualifies as "Grey Belt" (previously developed land or land making a negligible contribution to Green Belt purposes). Open, working farmland across Ashley strongly fulfills Green Belt functions and is further disqualified under **NPPF Footnote 7** due to the presence of statutory environmental, heritage, and agricultural constraints.

2. Breach of Spatial Strategy & Sustainable Settlement Hierarchy

- **Incompatible Settlement Rank:** Ashley is classified at the lowest tier of the settlement hierarchy under **CELPS Policy PG 2 (Settlement Hierarchy)**. It lacks the essential social infrastructure, medical services, primary educational capacity, and local employment required to support residential growth.
- **Conflict with Sustainable Development:** Allocating major growth in a rural location without high-frequency public transport directly contravenes **CELPS Policy SD 1 (Sustainable Development in Cheshire East)**, **CELPS Policy SD 2**, and **NPPF Chapter 2**, which mandate directing development to Tier 1 Principal Towns and Tier 2 Key Service Centres.

3. Severe Highway Safety Risks & Statutory Aviation Safeguarding

- **Highway Network Capacity:** The rural road network serving Ashley relies on narrow lanes, single-track bridges, and severe pinch points. The volume of vehicle movements generated by a 291-hectare site would cause severe cumulative network congestion and safety hazards, conflicting directly with **CELPS Policy CO 1 (Sustainable Travel and Transport)**, **Policy CO 4**, and **NPPF Paragraph 115**.
- **Statutory Airport Safeguarding:** The site sits directly beneath operational noise contours and bird-strike hazard management zones for Manchester Airport. Introducing high-density housing here conflicts with statutory aerodrome safeguarding protocols and **CELPS Policy SE 12 (Pollution and Land Instability)** regarding public safety and noise exposure.

4. Flood Risk, Drainage & Utility Constraints

- **Surface Water & Drainage:** The area lacks deep sewer networks, main grid upgrades, and surface water drainage capacity. Allocating large-scale development would exacerbate surface water flooding in the River Bollin catchment, violating **CELPS Policy SE 13 (Flood Risk and Water Management)** and **NPPF Chapter 14 (Paragraphs 165–175)**.
- **Infrastructure Deficits:** Under **CELPS Policy IN 1 (Infrastructure)**, candidate sites must demonstrate deliverable utility connections without causing off-site environmental harm.

5. Unacceptable Loss of Best and Most Versatile (BMV) Agricultural Land

- **Food Security & Soil Quality:** Soil assessments (including HS2 Phase 2b data) confirm the site comprises Grade 2 and Subgrade 3a Best and Most Versatile (BMV) agricultural land. The site comprises a continuous tract of Best and Most Versatile agricultural land rather than isolated parcels, increasing its strategic importance for food production.
- **Policy Conflict:** National policy (**NPPF Paragraph 180**) and local strategy (**CELPS Policy SE 2: Efficient Use of Land**) explicitly mandate that local authorities protect high-grade agricultural land for food security and direct development to brownfield or lower-quality land first.

6. Irreparable Harm to Landscape, Ecology & Historic Assets

- **Landscape Protection:** The proposal would destroy the setting of the Bollin Valley and Parklands Local Landscape Designation (LLD) and the Rostherne/Tatton Park LLD, violating **CELPS Policy SE 4 (The Landscape)**.
- **Ecological Degradation:** Development would sever protected ecological corridors and threaten sensitive habitats, including Cotterill Clough Nature Reserve/SSSI, breaching **CELPS Policy SE 3 (Biodiversity and Geodiversity)** and **NPPF Paragraphs 180–185**.

- **Heritage Impact:** The site encompasses the settings of 19 Grade II listed buildings (including Ashley Hall). Under **CELPS Policy SE 7 (The Historic Environment)** and **NPPF Chapter 16 (Paragraphs 200–208)**, great weight must be given to conserving designated heritage assets and their landscape settings.

Conclusion & Formal Request

This 291.03-hectare submission (12 adjoining sites totalling 291.03 hectares) conflicts with almost every fundamental constraint metric used in plan-making. It breaches local spatial strategy, fails national Green Belt policies, lacks basic infrastructure, destroys high-grade agricultural land, and threatens protected heritage and landscape assets.

I formally request that Cheshire East Council classify these submissions as **Unsuitable, Unavailable, and Undeliverable** in the SHELAA assessment and exclude them from any future Local Plan allocations.