To: Spatial Planning Team, Cheshire East Council

Subject: Formal Representation: Objection to Strategic Housing and Economic Land Availability Assessment (SHELAA) Submission for Land at Ashley (Site Reference: 12 Contiguous Parcels Totalling 291.03 Hectares)

I am writing to register a formal objection to allocating or considering the 291.03-hectare tract of land surrounding Ashley across all 12 contiguous parcels within the SHELAA and the broader Local Plan review. Promoted development of this magnitude in this sensitive rural area is fundamentally unviable and directly violates statutory local policy and the National Planning Policy Framework (NPPF).

1. Green Belt Protections and "Grey Belt" Disqualification

- **Protected Wash-Over Designation:** CELPS Policy PG 3 designates the entirety of Ashley Parish as "wash-over" Green Belt to preserve the open, rural character of sensitive villages.
- **Preventing Settlement Coalescence:** Ashley forms the narrowest remaining countryside buffer separating Greater Manchester (Trafford, Hale, Altrincham) from Cheshire East (Knutsford, Mobberley). Under Policy GB2 and Policy GB6, allocating this site fails the national tests set out in Annex E by driving urban sprawl (Purpose A) and merging distinct settlements (Purpose B).
- **Failure of "Grey Belt" Criteria:** Under Policy GB7, "Grey Belt" land must not strongly contribute to core Green Belt purposes. This contiguous tract of active farmland performs critical Green Belt functions. While the updated NPPF removes the former Footnote 7 threshold from the initial Grey Belt qualification test, significant heritage, ecological, and flood constraints across the site remain decisive barriers to development under broader national policies.

2. Loss of Best and Most Versatile (BMV) Agricultural Farmland

- **High-Tier Soil Classification:** Detailed soil assessments, including survey data from HS2 Phase 2b, confirm that this 291.03-hectare site consists predominantly of Grade 2 and Subgrade 3a Best and Most Versatile (BMV) farmland.
- **Food Security and Soil Preservation:** Concrete development across this uninterrupted, productive agricultural landscape directly undermines regional food production, violating CELPS Policy SE 2 and national soil protection mandates requiring local planning authorities to prioritize lower-grade or brownfield land.

3. Highway Safety Hazards, Rail Deficits, and Aviation Restrictions

- **Failure to Meet "Well-Connected Station" Standards:** Policy GB7 introduces specific support for higher-density development near "well-connected" railway stations. To qualify, a station must offer at least 4 services per hour (or 2 per hour in one direction). Ashley station fails this test completely, operating on a maximum of 1 train per hour with no commuter car park. Service levels will worsen further following the funded, approved station at Cheadle; in March 2026, Parliamentary Under-Secretary of State for Transport Keir Mather MP confirmed that service reallocations reducing Ashley and Plumley calls to one train every two hours are necessary to accommodate Cheadle's stops.

- **Severe Road Bottlenecks:** Local rural infrastructure cannot accommodate heavy vehicular traffic. The network relies on narrow, single-lane bridge pinch points over the railway, the River Bollin, and Birkin Brook, creating severe cumulative congestion risks in violation of CELPS Policy CO 1, Policy CO 4, and national transport safety policies.
- **Aerodrome Safeguarding Zones:** Positioned beneath Manchester Airport's operational flight paths, the site falls within restricted noise contours and bird-strike management zones, conflicting with aerodrome safety requirements and CELPS Policy SE 12 regarding public health.

4. Adverse Impacts on Landscape, Ecology, and Cultural Heritage

- **Landscape Degradation:** Allocating these sites would permanently damage the settings of both the Bollin Valley and Parklands Local Landscape Designation (LLD) and the Rostherne/Tatton Park LLD, violating CELPS Policy SE 4.
- **Ecological Fragmentation:** Mass construction would sever critical habitat corridors and imperil nearby sensitive ecological assets, including the Cotterill Clough SSSI / Nature Reserve, breaching CELPS Policy SE 3 and national nature recovery mandates. There are also three red listed bird species present on the land year around - grey partridge, tree sparrow and greenfinch.
- **Irreversible Heritage Damage:** The open fields frame the settings for 19 Grade II listed structures, including Ashley Hall. Allocating this site violates statutory requirements under CELPS Policy SE 7 and national heritage policies that require local authorities to give great weight to conserving designated historic assets and their rural settings.

5. Hydrological Risks, Drainage, and Infrastructure Inadequacies

- **Exacerbated Flooding:** Paving over this catchment area would dramatically increase surface water run-off into the River Bollin, creating severe off-site flood risks in breach of CELPS Policy SE 13 and national flood resilience policies.
- **Utility Capacities:** The local area lacks the sewer system capacity, power grid infrastructure, and drainage networks needed for intensive growth, failing the deliverability requirements of CELPS Policy IN 1.

6. Invalidation under Spatial Strategy and Settlement Hierarchy

- **Lowest Tier Placement:** Under CELPS Policy PG 2, Ashley sits at the lowest tier of the settlement hierarchy, lacking the primary schools, local healthcare facilities, and job markets required to support a strategic population influx.
- **Contradiction of Sustainable Growth Principles:** Directing strategic housing to an isolated rural village conflicts with CELPS Policy SD 1 and Policy SD 2, as well as national plan-making principles that mandate concentrating major developments within Tier 1 Principal Towns and Tier 2 Key Service Centres.

Conclusion and Action Requested The submission across all 12 contiguous parcels (totalling 291.03 hectares) fails every fundamental planning test under both local policies and the current NPPF framework. I formally request that Cheshire East Council mark all 12 site submissions as **Unsuitable, Unavailable, and Undeliverable** within the SHELAA report and exclude them entirely from future Local Plan allocations.