Formal Representation: Objection to SHELAA Submission for Land at Ashley
12 Contiguous Parcels Totalling 291.03 Hectares

To: Spatial Planning Team, Cheshire East Council

I work at a farm in Ashley and I am writing to register a firm formal objection to the inclusion and consideration of the 291.03-hectare land submission around Ashley within the Strategic Housing and Economic Land Availability Assessment (SHELAA) and the wider Cheshire East Local Plan review.

The submission comprises **12 adjoining and contiguous parcels extending to approximately 291.03 hectares**. Taken together, these parcels represent a development opportunity of a scale wholly disproportionate to the existing settlement of Ashley and one which would fundamentally alter the relationship between the village, the surrounding Cheshire countryside and the Greater Manchester urban area.

The evidence indicates that this land is **unsuitable, unavailable and undeliverable for strategic development**. In particular, it is important that the land is assessed correctly under the current National Planning Policy Framework (NPPF) and is not treated as Grey Belt simply because it is Green Belt land that could potentially contribute towards meeting housing need.

The principal reasons are set out below.

1. Ashley performs an important strategic Green Belt function

The starting point should be that the Ashley land is **Green Belt for a clear spatial reason.** The parish of Ashley is designated as **washed-over Green Belt under Cheshire East Local Plan Strategy Policy PG 3**. The designation reflects the particular sensitivity of this rural settlement and the importance of maintaining the openness and rural character of the surrounding countryside.

The current NPPF identifies the purposes of Green Belt as including:

- checking the unrestricted sprawl of large built-up areas;
- preventing neighbouring towns from merging into one another;
- safeguarding the countryside from encroachment;
- preserving the setting and special character of historic towns; and
- assisting urban regeneration.

The Ashley land makes a particularly strong contribution to the first three of these purposes. It is not simply countryside surrounding a small settlement. Its location gives it a **strategic spatial function**, helping to maintain the remaining open separation between the Greater Manchester urban area, including Trafford, Hale and Altrincham, and the settlements and open countryside of Cheshire East, including Mobberley and Knutsford.

Development across 291.03 hectares would therefore not merely enlarge Ashley. It would substantially extend built development southwards and materially weaken the strategic countryside gap between Greater Manchester and Cheshire.

This is precisely the type of strategic function for which Green Belt protection exists.

2. The land should not be treated as Grey Belt simply because it is Green Belt

The current NPPF does provide for certain Green Belt land to be identified as Grey Belt. However, this does **not** create a general presumption that Green Belt land should be released wherever there is a housing requirement.
The assessment must be site-specific.
The relevant question is whether this particular land makes a strong contribution to the relevant Green Belt purposes and whether development would be consistent with the wider requirements of the NPPF.
The Ashley land is:

- open countryside;
- predominantly productive agricultural land;
- contiguous across a very substantial area;
- strategically positioned between major urban and rural settlements;
- important in preventing further outward urban expansion; and
- important in maintaining separation between distinct settlements and communities.

These characteristics point strongly towards the land being **high-performing Green Belt**, rather than land which has ceased to perform a meaningful Green Belt function.
The Council should therefore require clear evidence demonstrating how the Ashley land could properly be characterised as Grey Belt when assessed against the current NPPF.

3. The land strongly contributes to preventing urban sprawl

The land performs a particularly important role in checking the outward expansion of the Greater Manchester urban area.
The proposed development would create an extensive new development front extending into open Cheshire countryside.
This is not a small, contained extension to an established settlement. At 291.03 hectares, the submission is capable of accommodating development on a scale that would fundamentally alter the area's settlement pattern.
The effect would be to push urban development further into the countryside and establish a much more substantial built presence between Greater Manchester and the Cheshire settlements to the south.
The proposal therefore conflicts directly with the Green Belt purpose of **checking unrestricted sprawl**.

4. The land is critical to preventing settlement coalescence

The prevention of neighbouring settlements merging is an especially important consideration at Ashley.
The land forms part of the remaining open countryside separating the Greater Manchester settlements to the north from Cheshire settlements to the south.
A 291.03-hectare development would materially reduce that separation.
The issue is not simply whether individual villages would literally become physically joined by buildings. Green Belt policy is intended to prevent the progressive erosion of the open gaps which distinguish and separate settlements.
Once a development of this scale is introduced, the remaining gaps become narrower and more vulnerable to further development pressure.
The long-term consequence would be a significant weakening of the distinction between Greater Manchester and the Cheshire settlement pattern.
This would directly undermine one of the fundamental purposes of the Green Belt.

5. The 12 parcels must be assessed cumulatively

The fact that the submission comprises 12 parcels must not obscure the fact that they are **adjoining and collectively extend to 291.03 hectares**.
The Council should assess the combined spatial consequences of releasing the land rather than considering each parcel in isolation.
The relevant planning question is not simply whether individual parcels might be capable of accommodating development.

It is:

What would be the effect of releasing this connected 291.03-hectare area from the Green Belt as a whole?

The cumulative consequences for:

- Green Belt openness;
- urban sprawl;
- settlement separation;
- landscape character;
- ecological connectivity;
- transport infrastructure;
- drainage;
- utilities; and
- the remaining Green Belt

would be substantially greater than the effect of considering individual parcels separately.
A piecemeal assessment could therefore fail to recognise the strategic significance of the overall submission.

6. The release would undermine the remaining Green Belt

The current NPPF makes clear that development on Grey Belt land should not fundamentally undermine the purposes, taken together, of the **remaining Green Belt across the area of the plan**.
This is highly relevant at Ashley.
The proposed release is not a small, isolated intervention with little consequence for the surrounding Green Belt.
At 291.03 hectares, it would remove a very substantial and strategically positioned area of open countryside from the Green Belt.
It would also create a new development edge and increase development pressure on the remaining countryside.
The Council should therefore assess not only the immediate effect of development on the submitted parcels, but also the effect of removing them from the Green Belt on the **integrity and permanence of the remaining Green Belt**.

7. There is no justification for treating Ashley as a preferred location for strategic growth

Ashley is a small rural settlement and is not a Principal Town or Key Service Centre.
The scale of development proposed is therefore fundamentally disproportionate to the settlement's existing function and infrastructure.
Cheshire East's spatial strategy seeks to direct significant growth towards locations capable of supporting it through established services, employment opportunities, transport infrastructure and community facilities.
A development of 291.03 hectares around Ashley would represent a fundamental change in the settlement rather than proportionate village growth.
The proposal should therefore be considered against the Council's settlement hierarchy and its established spatial strategy before any question of Green Belt release is entertained.

8. Even if any part of the land were considered Grey Belt, the location remains unsustainable

This is an important distinction under the current NPPF.

Grey Belt status does not automatically make a site suitable for development.

The NPPF requires development on Grey Belt land to be in a **sustainable location**, with particular reference to the Framework's transport and accessibility policies.
Ashley presents serious concerns in this respect.
The area has:

- limited public transport;
- limited rail provision;
- restricted railway-station parking;

- narrow rural roads;
- constrained bridge crossings;
- limited local services;
- limited employment opportunities;
- significant infrastructure requirements; and
- substantial highway and drainage constraints.

The scale of the proposed development would therefore generate a level of movement and infrastructure demand wholly disproportionate to the existing capacity of the area.
Even if the Council were to consider any portion of the land capable of being characterised as Grey Belt, that would not resolve the separate question of whether a strategic development of this scale represents a sustainable pattern of development.

9. The Council must fully examine reasonable alternatives before sacrificing high-performing Green Belt

The NPPF requires authorities, when considering Green Belt boundary changes, to demonstrate that other reasonable options for meeting identified development needs have been fully examined.
This includes making as much use as possible of suitable brownfield and under-utilised land, optimising density in sustainable locations and considering whether neighbouring authorities can accommodate some of the identified need.
The Council should therefore be able to demonstrate:

1. that all reasonable brownfield and previously developed opportunities have been fully considered;
2. that opportunities to optimise development in existing sustainable settlements have been properly examined;
3. that lower-performing Green Belt opportunities have been assessed; and
4. that the release of this particular high-performing strategic Green Belt location is genuinely necessary.

The question should not simply be whether Ashley can accommodate housing.
It should be:
Why should this strategically important Green Belt land be sacrificed when other reasonable and potentially more sustainable opportunities have not first been exhausted?
That question is particularly important given the exceptionally strong Green Belt functions performed by the Ashley land.

10. High-quality agricultural land reinforces the case for retaining Green Belt protection

The proposed development would result in the permanent loss of a very substantial area of productive agricultural land.
Available evidence, including survey information associated with the HS2 Phase 2b work, indicates that much of the area comprises **Grade 2 and Subgrade 3a Best and Most Versatile (BMV) agricultural land**.
This is important not only as an agricultural-land consideration in its own right, but because it reinforces the fact that the land remains functioning, productive countryside.
It is not previously developed land or land which has become detached from its rural setting.
It is open working agricultural land performing multiple functions, including agriculture, landscape, ecological connectivity and Green Belt separation.
The permanent conversion of such land to a major urban development should therefore require particularly compelling justification.
This is a further reason why the land should not be treated as an obvious or low-value Green Belt release opportunity.

11. Environmental and landscape constraints reinforce the importance of retaining the Green Belt

The proposed development would permanently transform a large area of open countryside and would have significant implications for landscape character and ecological connectivity.

The land forms part of the wider landscape associated with the **Bollin Valley and Parklands Local Landscape Designation** and the **Rostherne/Tatton Park Local Landscape Designation**.
Development of this magnitude would introduce extensive built form, roads, lighting and associated infrastructure into an essentially rural landscape.
The area also has important ecological relationships with **Cotterill Clough Nature Reserve and SSSI**, together with surrounding habitats and ecological corridors.
The land provides habitat for Red-Listed bird species identified in the supporting evidence, including **grey partridge, tree sparrow and greenfinch**.
These considerations do not, in themselves, determine whether land is Grey Belt. However, they materially reinforce the conclusion that this is functioning, sensitive open countryside and provide additional planning reasons why its release would be inappropriate.

12. Heritage assets and their settings provide further reasons against release
The open agricultural setting contributes to the significance and character of **19 Grade II listed buildings, including Ashley Hall**.
A development of 291.03 hectares would fundamentally alter that setting through the introduction of large areas of built form, roads, lighting and associated urban activity.
The resulting harm to the rural context of these heritage assets would be a further material consideration against the release of the land.
This engages **CELPS Policy SE 7** and the relevant national heritage policies.

13. Transport, highway and aviation constraints further undermine deliverability
Ashley railway station provides only a limited service and has restricted parking.
The March 2026 parliamentary debate concerning the proposed Cheadle railway station recorded that modelling contemplated reducing services at Ashley, Plumley and Mobberley from hourly to every two hours in order to facilitate Cheadle services.
This is directly relevant when assessing whether Ashley can reasonably be regarded as a sustainable location for strategic growth.
The surrounding road network is also predominantly rural and constrained, including narrow roads and bridge crossings over the railway, River Bollin and Birkin Brook.
A development of this scale would generate substantial additional traffic and would require significant improvements to infrastructure that is currently constrained.
The land's relationship with Manchester Airport also introduces aviation safeguarding, aircraft-noise and bird-strike considerations which require careful assessment.
These matters materially weaken the case for treating Ashley as an appropriate location for strategic development.

14. Flood risk, drainage and infrastructure deficiencies raise fundamental deliverability concerns
Parts of the area, particularly towards the M56, are already susceptible to flooding and surface-water problems.
Development over 291.03 hectares would introduce extensive impermeable surfaces and consequently increase surface-water runoff.
The potential consequences for the River Bollin catchment and downstream areas require particularly careful consideration.
There are also significant questions regarding electricity-grid capacity, sewerage, drainage and other utilities required to support a development of this magnitude.
These are not merely matters which can be assumed to be resolved at a later stage.
The SHELAA assessment should establish whether the necessary infrastructure is realistically deliverable and whether the required works are proportionate and achievable.

15. The cumulative case is decisive
The principal objection is not based upon one isolated planning constraint.
The Ashley land is affected by a **combination of mutually reinforcing considerations**:

- strong Green Belt performance;
- prevention of urban sprawl;
- prevention of settlement coalescence;
- protection of open countryside;
- strategic separation between Greater Manchester and Cheshire;
- inappropriate scale in relation to Ashley's settlement function;
- limited sustainable transport;
- severe highway constraints;
- aviation safeguarding and noise considerations;
- ecological sensitivity;
- landscape designations;
- heritage assets and their settings;
- Best and Most Versatile agricultural land;
- flood and drainage concerns; and
- substantial infrastructure requirements.

Taken together, these factors demonstrate that this is not a conventional development opportunity which happens to be located within the Green Belt.

It is a **strategically important area of functioning Green Belt countryside whose release would have consequences far beyond the boundaries of the individual parcels**.

The Council should therefore resist any approach which treats the 12 parcels as a collection of unrelated development opportunities.

The appropriate assessment is of the **291.03-hectare strategic landholding and its effect on the wider Green Belt and settlement pattern**.

Requested Action

For all of the reasons set out above, I respectfully request that Cheshire East Council:

1. **Record all 12 contiguous parcels, totalling 291.03 hectares, as Unsuitable, Unavailable and Undeliverable within the SHELAA assessment;**
2. **Assess the 12 parcels cumulatively as a single strategic landholding when considering their effect on Green Belt openness, sprawl, settlement separation and the remaining Green Belt;**
3. **Do not identify the land as Grey Belt or as a preferred location for strategic development;**
4. **Do not identify the land as a preferred or potential strategic housing allocation within the Local Plan review;**
5. **Require any consideration of Green Belt release to demonstrate why all reasonable brownfield, previously developed, urban and lower-performing Green Belt alternatives have been fully examined first; and**
6. **Exclude all 12 parcels from future Local Plan allocations on the basis of their combined spatial, environmental, transport, infrastructure, agricultural, heritage and flood-risk constraints.**

The current NPPF does not provide a general mechanism for converting Green Belt into development land simply because additional housing is required.

The relevant question is whether **this particular land** is appropriate for release.
In Ashley, the evidence points strongly in the opposite direction.

The land makes a substantial contribution to the purposes of the Green Belt, particularly by checking urban sprawl, preventing the merging of settlements and safeguarding open

countryside. It performs a strategic function in maintaining the separation between Greater Manchester and Cheshire and forms part of a coherent area of open, productive countryside.

The scale of the proposed release — **291.03 hectares across 12 contiguous parcels** — would magnify these impacts and would risk creating precisely the outward urbanisation and loss of settlement separation that Green Belt policy is intended to prevent.

Even if any part of the land were argued to constitute Grey Belt, the NPPF's separate requirements concerning sustainable location, the effect on the remaining Green Belt, demonstrable unmet need and the examination of reasonable alternatives would remain highly relevant.

The combination of Green Belt performance, settlement hierarchy, transport limitations, infrastructure deficiencies, agricultural value, ecological and landscape sensitivity, heritage considerations, aviation constraints and flood-risk concerns makes this land fundamentally inappropriate for strategic development.

I therefore respectfully request that the Council concludes that the **291.03-hectare submission is unsuitable, unavailable and undeliverable for strategic development**, that it should **remain within the Green Belt**, and that all 12 parcels should be excluded from future Local Plan allocations.

Yours faithfully,

Brian Crawley