

PROTECT BUTTERFLY BANK

Planning Application 25/3735/FUL



Consolidated Objection Report

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PLAN:8
Town Planning Ltd



Shepherd Gilmour
Consulting Engineers



Elite Ecology

PROTECT BUTTERFLY BANK

Planning Application 25/3735/FUL



Covering Letter



To:
Mr Paul Wakefield
Planning Department
Cheshire East Council
Delamere House
Delamere Street
Crewe
CW1 2LL

From:
Protect Butterfly Bank Committee
Wilmslow
Cheshire

Date: 17th December 2025

***Subject: Formal Objection to Planning Application 25/3735/FULL
Land of Welton Drive and Stockton Road, Wilmslow***

Dear Mr Wakefield,

I write on behalf of Protect Butterfly Bank to submit a **formal objection** to planning application **25/3735/FUL**, which seeks approval for the construction of 84 dwellings, a proposed “country park”, public open space and associated works on designated Green Belt land.

Our objection is founded on **substantial planning, environment, technical and procedural grounds**, all of which are set out in detail in the attached documents. Based on the evidence of multiple independent consultants and statutory bodies, it is our firm view that this application is fundamentally non-compliant with both national planning policy and the **Cheshire East Development Plan** and therefore must be refused.

The independent reviews demonstrate not only policy conflict, but **fundamental deficiencies in survey cope, methodology and assessment**, such that the environmental and landscape effects of the proposal cannot be properly understood, assessed or lawfully mitigated. In its current form, the application is not supported by a robust or complete evidence base.

In support of this objection, we enclose the following documents:

1. **Objection Statement** prepared by the Protect Butterfly Bank committee.
(Filename: 25-3575-FUL-PBB-Objection-Statement)
2. **Green Belt and Planning Policy Objection** prepared by Plan8: Town Planning.
(Filename: 25-375-FUL-Plan8-PlanningObjection-Letter)
3. **Objection to the Submitted Flood Risk Assessment & Drainage Strategy**
prepared by Shepherd Gilmour Infrastructure Ltd.
(Filename: C1908-RBG-2025255 Planning Objection Letter)
4. **Objection to the Submitted Transport Assessment** prepared by Shepherd Gilmour Infrastructure Ltd.
(Filename: C1908-RBG-2025256 Planning Objection Letter (TA))
5. **Objection to the Submitted Arboricultural Statement** prepared by Shepherd Gilmour Infrastructure Ltd.



(Filename: C1908-RBG-2025257 Planning Objection Letter (Arb))

6. **Civil Engineering Review** prepared by Gavin Dawber EngTech MICE BEng
(Filename: 25-3735-FUL-Gavin-Dawber-Planning-Docs-Review)
7. **EIA Technical Report Review**, prepared by Elite Ecology
(Filename: 25-3735-FUL-PBB-Elite Ecology EIA Review (December 2025))
8. **LVA Technical Report Review**, prepared by Elite Ecology
(Filename: 25-3735-FUL-PBB-Elite Ecology LVA Review (December 2025))

Together, these documents demonstrate:

- **Significant Green Belt harm**, with the site making a strong contribution to preventing urban sprawl and the merging of Wilmslow and Alderley Edge, confirmed in both Arup/CEC 2015 Green Belt Assessment and Plan:8's updated review.
- **Non-compliance with NPPF 2025/2025**, including the 'grey belt' test, very special circumstances, permanence of boundaries and sustainable development requirements.
- **Fundamental ecological failures**, including incomplete and inadequate protected species surveys, deviation from Natural England and CIEEM guidance, absence of a lawful Habitats Regulations Assessment despite identified Ramsar sites, and a flawed and unreliable Biodiversity Net Gain assessment. As a result, the ecological impacts of the proposal cannot be properly assessed or mitigated.
- **Significant landscape and visual harm**, compounded by a Landscape and Visual Appraisal that fails to meet GLVIA3 standards, does not systematically assess landscape value, omits cumulative effects, and does not robustly apply national and local policy tests, including Green Belt purposes.
- **Major technical deficiencies with the Flood Risk Assessment, Transport Assessment and Arboricultural Statement**, each of which has been professional reviewed and found to be non-compliant with national and local policy requirements.
- **Unresolved safety and infrastructure issues**, including drainage capacity, flood risk to existing homes, unsafe access arrangements and resolved land ownership matters.

In these circumstances, the application is not supported by a complete, lawful or robust evidence base and cannot be regarded as capable of determination in its current form. We therefore respectfully request that Cheshire East Council refuse planning application 25/3735/FUL on the grounds set out in full in the accompanying documents.

Please confirm receipt of this objection and associated files. We would be grateful for notification of any further consultation stages or additional information submitted by the applicant.



Yours sincerely,

A handwritten signature in black ink, which appears to read 'D. Turnbull'.

Protect Butterfly Bank Committee
Chair: David Turnbull
hello@protectbutterflybank.co.uk

PROTECT BUTTERFLY BANK

Planning Application 25/3735/FUL



Objection Statement



To:
Mr Paul Wakefield
Planning Department
Cheshire East Council
Delamere House
Delamere Street
Crewe
CW1 2LL

From:
Protect Butterfly Bank Committee
Wilmslow
Cheshire

Date: 17th December 2025

***Subject: Formal Objection Statement to Planning Application
25/3735/FULL Land of Welton Drive and Stockton Road, Wilmslow***

1. Development on designated Green Belt

Government guidelines on Green Belt

The NPPF framework states: The Government attaches great importance to Green Belts. The fundamental aims of Green Belt policy are to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belt purposes are their openness and permanence.

NPPF 153 also states that “inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances”. No such special circumstances have been submitted by Jones Homes.

Additionally, Cheshire East Council must evaluate this site’s contribution to the Green Belt’s purposes namely a), b) and d) as detailed below:

- a) to check the unrestricted sprawl of large built-up areas.
- b) to prevent neighbouring towns merging into one another.
- d) to preserve the setting and special character of historic towns.

The proposed development clearly breaches a) and b) as set out below and goes against the over-arching principle of keeping land permanently open and permanent.

a) Urban sprawl

The PPG provides assessment criteria to check urban sprawl of large built-up areas (Paragraph 005).

Specifically:

Strong features. Assessment areas that contribute strongly are likely to be free of existing and lack physical features that could restrict and contain development.

They are also likely to include all of the following features:



- Be adjacent, or near to, large built-up areas.
- If developed, result in an incongruous pattern of development (such as an extended “finger” of development into Green Belt land).

Definitions of incongruous include “not in harmony with, or in keeping with, the surroundings”. Incongruous can also be described as inappropriate, incompatible, unsuitable, out of place, discordant and inconsistent.

The developer claims in the Planning Statement that the site is partially enclosed by existing development such that new development would not result in an incongruous pattern of development. This ignores the fact that this space is currently open countryside and does not “round off” the existing urban development. It would, by its very nature, significantly reduce the openness and permanence.

It would clearly produce a “finger of development” into open fields.

The developer further contends that “the country park will contain the proposed development”. This cannot be allowed to stand as a defence.

WM8, the proposed site and WM7 are defined as Green Belt as one parcel and cannot be arbitrarily carved up to suit the developer’s desire to develop WM8.

The boundary line along the land behind Chesham Rd is drawn specifically to prevent further development into the open fields. i.e. to prevent urban sprawl.

This substantial development would, therefore, clearly result in unjustified urban sprawl, which would push Wilmslow’s built form southward into open Green Belt, resulting in a “finger” or ribbon of development that would permanently compromise the integrity and function of the Green Belt and destroy the very openness it is designed to protect. This is against all the PPG criteria noted above.

It is an incongruous development, in that is neither in harmony, in keeping with its surroundings, nor appropriate, compatible or suitable.

The PPG also requires assessment as to whether physical boundaries could restrict and contain development. The existing boundaries fail this test:

- Hedgerows can be removed or breached.
- Field boundaries provide only visual screening, not development constraint.
- There is a lack of substantial infrastructure to prevent further urban sprawl.
- Indeed, the lone field outlined in blue in the planning application GA colour plan-1000, is owned by Jones Homes, but excluded from either the park or this application. A potential road, linking this field to the small 3 house part of the development, is also excluded as shown above in the colour plan. Jones Homes, when questioned about this field, said it was not for sale and could form part of phase two of this development. This would exacerbate urban sprawl as demonstrated above and result in this Green Belt site being destroyed by a thousand cuts.
- It should be further noted that a planning in principle application, 25/1730/PIP, land between Alderley Rd and Melrose Way to the south east of the proposed site, was rejected on the basis of urban sprawl.



In conclusion, the planning application must be rejected because:

- The development would result in unjustified urban sprawl.
- Wilmslow's built form would be pushed southward resulting in a "finger" of incongruous development.
- This would destroy the openness and integrity of this piece of Green Belt.

b) Prevention of towns merging into one another.

There is no standard definition of a town. It cannot be measured by population or council type alone. However, it is clear that Alderley Edge functions as a town. It has a population of 4777, a population density of 1157 per square km, which is considered high for a population this size and all the amenities are consistent with the definition of a town, including a large supermarket, a GP surgery, several schools, churches, a railway station, a bus route and innumerable shops and businesses. (Full list included in Appendix).

This development would clearly close the built form of Wilmslow closer to Alderley Edge.

The PPG guidance provides assessment criteria that contribute to prevent towns merging into one another. (Paragraph 005).

Specifically:

Strong features. Assessment areas that contribute strongly are likely to be free from existing development and include all of the following features:

- Forming a substantial part of a gap between towns.
- The development of which, would likely result in loss of visual separation of towns.

It is clear that this proposed development would narrow the gap between the towns, in that the built form would bring Wilmslow closer to Alderley Edge.

The developer's contention in the Planning Statement that the proposed site will not contribute to a narrowing of the gap, ignores the fact that any development will bring the two closer, irrespective of boundary containment.

Further, the lone field, referenced above, to the north east of the site, should it be developed in phase two, would add to the closing of the gap.

The visual separation between Wilmslow and Alderley Edge would be lost for those houses on Chesham Road and Stockton Farm.

The planning statement contends that visual separation of the two towns would not be lost, due to natural landscape elements and topography, but ignores the fact that the trees screening Chesham Rd are deciduous and their view would be blocked and Stockton Farm's view would be compromised regardless.

In conclusion, this application fails on two points:



- It forms a significant part of the gap between Wilmslow and Alderley Edge.
- The development will result in the loss of visual separation of the two towns.

Further detailed analysis, conducted by our urban planning consultant, underpins this objection.

2. Over-riding Cheshire East Local Plan

Cheshire East planning policy. Cheshire East Local Strategy Plan 2010-2030 (adopted 2017)

- Policy PG3- Green Belt: establishes that within the Green Belt, inappropriate development will not be approved except in very special circumstances. This policy confirms that the Green Belt will be protected from inappropriate development in accordance with national policy as laid out in NPPF 153 (detailed above in section 1)
- Current national policy confirms this long held position that urban development within the Green Belt, is only acceptable as a last resort. Recent modifications to the way proposals within Great Britain should be assessed do not alter the Government's commitment to a local plan-led review system. The next planning review is due in 2027.

The developer contends in the Planning Statement, that the Cheshire East Local Plan is superseded by subsequent planning practice guidance and the evidence gathered is subsequently weakened.

As stated above, the assessment of this site was rigorously evaluated in accordance with national policy. Recent policy does not over-ride the principal that "any assessment area that is not justified to strongly contribute to any of the purposes of a) b) or d) can be identified as grey belt". As we have already argued this site meets criteria a) and b).

Thus, it remains the case that the proper way to consider alterations to the GB Green Belt is through the Local Plan Review. This is entirely consistent with the review conducted in 2015 to produce the Local Plan.

The methodology for this review is detailed below:

The site along with all other potential sites, was comprehensively assessed as part of the Arup/Cheshire East Council (CEC) Green Belt Assessment commissioned by

Cheshire East Council and published in July 2015. The proposed development site was recorded under the reference Parcel WM28 and labelled: land to the rear of Chesham Road.

The Arup assessment employed robust methodology: comprehensive field survey and analysis which included consistent assessment criteria across all parcels assessed. It was conducted by professional landscape and planning consultants with the necessary expertise. There have been no material changes to the site or the surrounding areas since 2015, given



that the remaining physical characteristics remain unchanged. Crucially, the assessment conclusions of the Arup/CEC report remain applicable, especially as the methodology used is consistent with current Planning Practice Guidelines.

The key assessment categories used by Arup/CEC were:

- Major contribution. Contributes strongly and undeniably, removal would detrimentally undermine purpose.
- Significant contribution. Contributes to majority of purpose but does not fulfil all elements.

The key findings of this assessment, relating to parcel WM28 (land behind Chesham Close) were, that it made a significant contribution in two key areas namely:

Purpose a) containing urban sprawl

b) preventing neighbouring towns merging into one.

Note: The Arup/CEC report defines both Wilmslow and Alderley Edge as towns.

Specifically:

- Purpose a): “The northern boundary would prevent further development and other boundaries are made up of tree-lined field boundaries which may also prevent further development but possible in the long term. The land is open land, adjoins development outside of the parcel to the north and west, but would not round off the settlement boundary and could encourage further sprawl around the development”.

Purpose b): “The parcel forms a large, essential gap between the settlements of Wilmslow to the north and Alderley Edge to the south. A reduction in the gap could lead to the perceived merging of the settlements and development of this parcel would lead to a merging of the gap between Wilmslow and Alderley Edge. The parcel plays a significant role in preventing the gap between the settlements but due to the existing boundaries, they would never actually merge”.

In conclusion:

This planning application would not over-ride Green Belt provisions of the Cheshire East local plan because:

- Recent planning changes do not over-ride NPPF 153.
- The Cheshire East planning policy PG3, establishes that within the Green Belt, inappropriate development will not be approved except in exceptional circumstances. No exceptional circumstances have been given.
- Current Government policy dictates that assessment of Green Belt should be considered by a local plan led review.
- The next local plan review is due in 2027
- The Arup/CEC of 2015 concluded that the development site (WM 28), made a significant contribution to containing urban sprawl and the prevention of closing the gap between the towns of Wilmslow and Alderley Edge.

As Cheshire East Councilor Mark Goldsmith remarked in discussions relating to the new Local Plan preparation “either the council oversees the destruction of our fields



or the developers will do it for us". This is precisely what this developer is trying to achieve with this proposed site.

3. Degradation of the Chonar Landscape.

A review of the Landscape Character of the Borough was undertaken in 2018. The Cheshire East Character Landscape Character Assessment (LCA) was prepared by Land Use Consultants (LCU) for and on behalf of Cheshire East Council. The assessment provides "an objective description of the landscape and strategy for managing the landscapes of Cheshire East and guiding landscape change in the Borough. The LCA does not set out policy, but provides an evidence base to inform policies and proposals in the emerging local plan, inform the determination of planning applications or more widely, around policy change, development and landscape management". (page 2, Cheshire East Landscape Character assessment, LUC May 2018).

The proposed development site is included within character LCA B1 "Chonar Character Area", which is categorised as lower woodland farmland and is specifically noted as an "area of farmland separating Wilmslow from Alderley Edge".

Further, the LUC note that "although the location is essentially urban-fringe, the character of much of the area is surprisingly rural, due to the lack of industry and the suburban character of the settlement edges, with large mature gardens and abundant trees".

The LUC assessment indicates that any development of the proposed site would undoubtedly be negative, given the "strongly rural character and naturalistic qualities experienced within the landscape, contrasting with and providing an escape from, nearby urban areas" (page 87).

The LUC report explains that the overall vision should be to "conserve the woodland and trees which give the landscape its wooded character, the semi-natural habitats and the rural character that has been lost in some places due to suburbanisation". (page 88).

Landscape guidance is given which advises decision makers to avoid loss of the characteristics above:

Specifically:

- Avoid development, both buildings and other structures, on steep slopes or in visually prominent locations.
- Ensure new and changing land uses do not degrade from the traditional rural character of the area
- Retain historic field patterns.
- Protect the overall wooded character of the area.
- Conserve and enhance existing unimproved grassland and remnant heathland habitats.



The advice from the LUC is that any development should be avoided in such locations.

The NPPF sets out criteria for a development site to be considered for “grey belt” which we have evaluated in objections 1 and 2 above. However, it goes on to state that “areas should be excluded where other policies would provide a strong reason to refuse development”.

The Chonar landscape represents this “strong reason”. Indeed, at the Northern Planning Committee meeting, Cheshire East Councillor Craig Browne cited the above NPPF criterion as one of the reasons for rejecting the 25/1064/OUT, which was agreed by 10 to 1

In conclusion, the development of this site would lead to the degradation of the Chonar Landscape:

- The land is farmland which separates Wilmslow from Alderley Edge.
- The development would compromise a visually dominant green field site and replace it with urban sprawl.
- Historic field patterns will be destroyed and land use will be fundamentally altered, thus affecting the rural nature of the location.
- The NPPF states that areas, such as the Chonar landscape, should be excluded as they represent a strong argument to refuse development.

4. Green belt developed before brown field sites.

The Secretary of State’s written Ministerial statement HCWS308 provides crucial policy context for Green Belt development and reinforces the protection of higher performing Green Belt land. The Minister set out the sequential approach to Green Belt release:

“In the first instance, it requires the local plan process to adopt a ‘sequential approach’ considering brownfield, then grey belt and only then higher performing land—all the while ensuring that sustainability is a central consideration throughout. We expect Local Authorities to conduct Green Belt reviews, to identify the right land to bring forward in their areas. Where authorities fail to meet development needs, developers may bring forward proposals on low-performing grey belt land outside of the plan process, but with higher performing land protected from this form of release”.

As a result, the key policy principles are:

- Plan-led sequential approach: Brown field, then grey belt, only then higher performing land
- High performing land protection: Explicit protection from development outside plan process
- Developer proposals limited: Only low performing grey belt can be proposed outside plan process.
- Local Plan primacy: Local Planning Authorities expected to conduct Green Belt reviews through plan-making. (in CEC, this would be 2027)



The call for sites in 2024 is out of date and will be even more so when this planning application will be reviewed. Since this time, more brown belt sites will have been registered, but not yet listed.

The last time the call for sites was initiated, the availability of Wilmslow brown field sites was understated.

We are aware that the current RoW's brown field site audit indicates a similar outcome for a significant number of additional houses being available from brown field sites as last time around.

If this is true for Wilmslow, it must hold that that this is also true for the rest of Cheshire East. This ultimately will mean that there will be sufficient brown belt sites available to meet the housing supply shortage.

In conclusion, Cheshire East must consider all brown belt sites before Green Belt and not consider Planning Applications on a "first come, first served" basis. We judge there are sufficient brown field sites available before Green Belt sites need to be considered

5. Significant increase in flood risk.

The FSA presented by the developer describes the flood risk as "low to medium" and assumes that Whitehall Brook can receive controlled discharge.

This contradicts the real situation namely:

- The brook already overtops frequently throughout the year.
- Whitehall Brook and its surrounding floodplain have flooded repeatedly, including in Jan 2024 and Jan 2025, the latter severe enough to trigger a statutory Section 19 flood investigation.
- During the 2025 event, properties near Ashford Rd and the bypass were flooded and residents evacuated. Several remain affected, months later, as the land is slow to drain and properties cannot full dry out, demonstrating a high and persistent water table
- Royal London SuDS overflow in heavy rain.
- The floodplain retains water for long periods.

We contend that the FSA is deeply flawed and the site represents a clear and present danger in increased flood risk.

Specifically:

5.1. High water table and clay soil.

British Geological Survey data and the developer's own FRA, confirm clay soils with very poor infiltration and repeated winter waterlogging. The fields require ditches and clay piping to remain farmable, even now.



Residents report permanent standing water and some have installed domestic pumps and drainage. Replacing permeable land with hard surfacing will accelerate run-off and increase flood risk.

The developer's own Phase 2 Geoenvironmental Report contains a key admission stating: "if local pumping is required.... dewatering in the surrounding areas may cause damage to building substructures in proximity to the site".

This means that construction will affect the stability of existing nearby homes, especially along the settlement edge where the clay is highly sensitive to changes in moisture.

Who will be responsible for the inevitable damage this will cause, if the planned development goes ahead?

None of the roadways are permeable surfaced, resulting in all run-off going to gulleys/rain gardens. (There is no indication of where the Exceedance Flow from these rain gardens will go).

This run-off will be exacerbated by some x-sections showing the land being lifted for access roads by up to and over 1.5m from existing levels. This will hugely affect the run off directions and flow into the attenuation areas. With the increased gradients from the side of the roads, excess water will run into the woods, beyond the site and into Whitehall Brook.

5.2. Whitehall Brook is narrow, meandering and low-capacity.

Whitehall Brook is a narrow, winding, shallow water course that becomes easily obstructed and flows slowly through the flood plain. It is not an engineered drainage channel and cannot safely receive the proposed surface water discharge from the development, especially when combined with bypass drainage and existing upstream SuDS outflows.

Further, we are not aware of any calculations that have been done on 14.4 L/s flow from the hydro brake into Whitehall Brook. This is a main stream that needs calculations to prove it can take the extra flow.

There is no indication of what scour protection is to be added at the outfall into Whitehall Brook, to prevent erosion of the stream bank under the headwall, stream bed and opposite bank.

5.3. Run-off will flow downhill into the brook.

The FRA confirms the proposed development lies at a higher elevation, sloping down to Whitehall Brook. Once the land is built over, rainfall will run off rapidly towards the watercourse reaching it faster and in larger volumes. This will raise peak levels, increase over-topping frequency and worsen flood risk to homes and land further down stream

In addition, any blockage further down Whitehall Brook, as has occurred in the past, (the Environment Agency has been made aware of blockages beyond The



Oakwood), could lead to the brook backing-up enhancing the flood risk on Ashley Rd.

This potential risk could result in flooding that could mirror the events that occurred on Ashley Rd in 2025. This would be a dereliction of duty of care by Cheshire East Council if this were allowed to happen following completion of this proposed development.

5.4. Bypass drainage and emergency access risk.

The A34 bypass drains into Whitehall Brook during storms to prevent the road from flooding. Emergency services have confirmed this must continue to keep the route open for emergency access. Adding further surface water into the same watercourse risks closure of a strategic emergency route and is not assessed in the FRA.

5.5. SuDS weaknesses and failure risk.

Infiltration SuDS are not viable on this site. The drainage strategy, therefore, relies entirely on engineered systems and storage.

There is no modelling of long-duration storms, blockages, surcharging, interaction with bypass drainage or Royal London SuDS overflow. If the system fails, even temporarily, flood risk to neighbouring land will inevitably enhance the flood risk to neighbouring land and houses.

5.5. Country Park in flood zone 3. Risk to life.

The Southern part of the proposed country park lies in flood zone 3, meaning a high probability of flooding. In winter, this land floods to dangerous depths. The developer proposes only signage, which is not an acceptable mitigation for public safety. A country park cannot be considered safe or appropriate in an area where flooding is deep, uncontrolled and unpredictable.

5.6. Section 19. Flood investigation.

A section 19 investigation is currently underway following the 2025 flood event. The cause of flooding has not been established, the wider system has not been modelled, or fixed and mitigation is unknown.

Approval of this scheme before this investigation is completed, would be irresponsible and contrary to guidance.

5.6. Environment Agency formal objection.

In a consultation response dated 5th November 2025, the Environment Agency issued a formal objection. This states that the FRA does not comply with national requirements. It fails to model climate change impacts, does not assess whether the proposed development would increase flood risk elsewhere and requires Product 4 modelling.



As a result, the Environment Agency recommends refusal of the planning application, until this work is completed. We believe that Cheshire East Council cannot go ahead without the Product 4 modelling being completed.

In conclusion:

It is clear from the above, that the FRA does not mitigate against the significantly increased flood risk.

The risks to surrounding houses, land, infrastructure and most importantly to residents cannot be taken.

Since the planning application was submitted, we note the following regulatory bodies have objected to the FRA as it currently stands:

The Environment Agency has stated that the FRA does not comply with national requirements and needs Product Modelling. This must be completed before the planning application can even be considered.

The LLFA has objected and approval will not be given until further work is conducted on the SuDS submission.

Finally, United Utilities have objected stating that drainage proposals are not acceptable as “there is no robust evidence that the drainage hierarchy has been thoroughly investigated”.

In addition, Alderley Edge Golf Club have objected to the proposed development as it would increase the flood risk to the golf course, which frequently floods already.

Further detailed analysis, conducted by our flooding/drainage consultants, underpins this objection.

6. Site access and increased vehicular activity

6.1. Welton Drive access

The developer has stated that access to the main site will be from the cul-de-sac end of Welton Drive. The access is planned through the currently walled and tree-backed boundary.

This ignores the fact that this strip of land is not owned by the developer. Cheshire East Highways may have an interest in the area, but have not maintained the wall, rather left it to the owner of 21 Welton Drive, who has rebuilt it.

Therefore, the developer has no legal right to the land and cannot access the site.

Notwithstanding the above, the proposal is to build a two-lane road through the proposed site. This onto, what up until now, has been a no through road.



Currently, access to the Council owned field, next to the proposed development, is through a wide gated area. Should access be achieved by the developer, all users will be funnelled through a narrow entrance.

This field is visited by residents, many of whom are elderly, children who visit the woods to ride their bikes and dog walkers.

On exiting the field, the site exit will be relatively blind from view, cars could be exiting at speeds of up to 30 mph. The risk of accidents and possible loss of life are, therefore, significant.

Further, Welton Drive is a narrow road and will not accommodate in excess of 150 cars driving through each day.

During construction of the proposed site, workers will inevitably park down Welton Drive restricting access for residents, utility vehicles and lorries leaving and entering the site. This will severely restrict Emergency vehicles. Clearly, this is untenable.

6.2. Stockton Road access.

Currently, the track down to the Butterfly Bank public footpath and woods is not open to vehicular traffic. If approval is given, this track will be widened for access to the three new houses. All these entrances will be blind, so safety risks for pedestrians and cyclists, will be greatly increased. This is against NPPF 111-113 which relates to safe and suitable access.

If the proposed site, were to be completed, use of this thoroughfare would be greatly increased by visitors to the park. Car parking down Stockton Rd, by park visitors, could block access for Emergency vehicles.

We note that Public Rights of Way require a detailed scheme of management to be submitted. They also indicate that direct action will be taken if the public are inconvenienced both during and after construction.

Bollard placement has room for vehicles, including cars, motor cycles and bicycles to pass between them and the hedges, giving residents of the main site an exit via Stockton Rd. This will become a much-used thoroughfare.

There is no indication of how the Emergency Services will remove the bollards and who will ensure replacement, adding to the possibility that this will become a “rat run” to Stockton Rd.

6.3 Increased vehicular traffic.

The developer’s traffic report, per hour section 7.6.10, indicates that site vehicle movements should not exceed 100 per hour. However, no mention is made of arriving and entering traffic from Knutsford Road alternating between Welton Drive and Stockton Road. This will depend on queuing traffic waiting to leave the junctions and, therefore, using Chesham Road as a fast link between the two.



Detailed junction assessments have been done for some junctions, but not Stockton Rd and Knutsford Rd.

Overall, we believe the traffic report does not give a true traffic assessment, given the fact it was based in the years when Covid was on and, therefore, does not give the real assessment of traffic in the area.

In conclusion:

The current access to the site is not owned by the developer and planning approval cannot be given until this is resolved.

Even if this is resolved, the access is dangerous and could lead to accidents and potential loss of life.

The Stockton Rd entrance is fraught with problems.

The increase in vehicular traffic assessment is flawed.

Further detailed analysis, conducted by our transport consultant, underpins this objection.

7. Degradation of the woodland and hedgerows.

The developer's arboriculture report overlooks several key issues namely:

- Numerous locations of buildings are within tree root management areas.
 - No details are given of construction methods for working within tree protection areas.
 - There is no indication if the work will be overseen by a qualified arboriculturist. Thus, there is no guarantee the work will not denigrate the woodland.
 - No indication is given of the final protection of the tree roots. i.e. the need for flexible/permeable material to preserve the tree roots and to ensure tree root growth and movement.
 - There is no indication that this final protection will be overseen by a qualified arboriculturist.
 - The ground levels must be raised for construction in TRPA's not lowered. There is no indication of this, in the report.
 - Several trees and hedges are to be removed without any rationale, namely: Hedge H3, which is in three sections, two of which are to be removed (one of which is in a TRPA). Tree G7, H13, H6, H16, which only need to be removed for the drainage crossing and not the full width, H19.
 - As has been seen on other new developments, new hedges are not planted to the same standard as existing hedges that have potentially been removed, without explanation, as detailed above. Measures must be undertaken to limit the hedge loss first, before new hedges are planted.



In conclusion:

- It is our view that the arboriculturist report has many omissions on protection of tree roots both during and post construction and lacks clarification of construction methods.
- Hedges are removed without justification.
- No indication is given of an arboriculturist overseeing the construction work protecting the TRPA's and final oversight of the completed protection.

On this basis, we conclude that the proposed works will denigrate the woodlands and hedgerows both immediately and over time.

Further detailed analysis, conducted by our arboriculture consultants, underpins this objection.

8. Lack of protection of wildlife.

Currently the proposed site is a haven for wildlife of all types including common birds, bats, otters, badgers, owls, buzzards, water voles, Kingfishers, deer, foxes and a high chance in the area of Great Crested newts, all allowed to nest and roam freely. On March 18th 2025, the developer submitted a request to Cheshire East Council (CEC) not to do an eia. Over 160 residents objected, as did Wilmslow's Planning Committee. (WPC).

Nevertheless, in August 2025, CEC upheld the request.

Given the developer's consultant started work on the eia with an initial bat survey on April 8th 2025, we find the time spent by CEC, WPC and residents was inappropriate.

We note that a Preliminary Environmental Assessment was not completed before the EOA. This would have highlighted significant impacts on protected species. This omission appears to be significant.

In our view, the EIA fails to address key issues on the protection of wildlife on the site as follows:

8.1. During construction.

- "Bats. T1, which is a FAR tree, may be subject to pruning/a crown lift, due to being located next to the access road. Further, should any direct impacts be anticipated by any trees identified as having bat potential, an aerial assessment by a bat licensed ecologist should be undertaken of the tree prior to the works being undertaken". There is no indication of who will be responsible for ensuring the bat ecologist needs to carry out the work.
- Birds. Hedgerows and treelines across the site have been shown to support breeding of five priority bird species (song thrush, wren, whitethroat and house sparrow) and other common and widespread breeding birds.
- All birds, their nests and eggs, are protected by law.
- To avoid triggering the legislation protecting nesting birds, clearance of suitable habitat must be carried out by an experienced Ecological Clerk of works, no more than 48 hours of work commencing. No indication is given as



to how this will be handled, especially as the breeding season is taken as March to September, at minimum.

- Badgers. Toolbox talk to be given to all contractors prior to work commencing to explain legislation relating to badgers. No detail given, to show this happens.
- All materials to be stored off the ground on pallets or in skips, capping of all pipework >200mm in diameter left overnight and sealing of trenches/excavations or providing a mammal ladder/escape ramp to allow badgers and small mammals to escape. Again, who will ensure this happens?
- There is no provision for the protection of deer and foxes on the proposed site.
- Finally, we cannot believe that noise will be minimised by CEMP to such an extent that wildlife will not be affected. This will especially true during the site levelling work.

8.2 Post construction.

- Great crested newts. The site must be registered under Natural England District Level Licensing (DLL) scheme to comply with legal duty to protect great crested newts. No work can be conducted until this has been received. The DLL is currently not in place. Further it must be kept up to date for the statutory period.
- Bats. The bat survey has not been completed. However, we believe the bat habitats will be compromised by the proximity of the proposed site. The developer asserts that bat habitats will not be compromised, yet has made provisions for 10 bat boxes. This is incongruous.
- Birds. We similarly believe that the proposed site will disrupt the bird colony, given that it is significantly closer to the woods.
- Badgers. There is no mitigation for badger protection post construction
- Deer and foxes. No mitigation is provided for these species.

In conclusion:

- During construction, a great deal of supervision is required to protect the wild life and their habitats. No guidance is given as to whom will deliver this. We also believe the noise impact cannot be mitigated by CEMP.
- Post construction, no DLL is in place, the bat survey is incomplete, there is no mitigation for badgers, deer or foxes.
- All habitats will be compromised by the proximity of the proposed site to the woodlands.

Further detailed analysis, conducted by our ecology consultant, underpins this objection.

9. Views across the ridgeline will be compromised.

The LVA is intended to inform the planting of trees and associated planting to soften the impact of the proposed site on the current views of the proposed site.

There are a number of assertions in the developer's consultant's analysis that bear scrutiny namely:

9.1. Views from the public right of way.



The developer's consultant's LVA states the public footpath from Stockton Road to the edge of the woods enjoys an uninterrupted view of farmland to the housing in Chesham Rd some 250 yards away, which are well screened from view.

The developer's consultant's view is that these footpaths will "experience a change in their view from agricultural fields with a residential housing background, to one where the proposed development will be brought forward in the view. However, residential development at the proposed site would not appear out of character in this enclosed area with the existing pattern of residential development". (We note, there is no photo view point to show the current open views currently enjoyed).

We fundamentally disagree. The current views are of an open landscape of over 400 yards, a primary function of Green Belt, that would be obscured, by the new proposed development. See photo 1 for evidence.



Photo 1

There is only one photo view point 3 from the bottom of the woods from the public footpath. However, for the entire length of said footpath from the entrance to the woods down to the golf course, there are open views of the proposed site. Currently the views across the ridgeline are open for 200 yards. See photo 2 for a view of the proposed site from the bottom looking up rather than across the site.



Photo 2



Photo 3



If the proposed site was approved, the views from the woods, along the public footpath, would be reduced to approx. 20 yards. We further note that the houses proposed to be built closest to the woods are 6,5 and 4 bedrooms, the largest on the proposed site. This would clearly compromise the views completely. See photos 3 and 4 as evidence.



Photo 4

9.2. Views from Alderley Edge Golf Course

Photo view 5, taken from Alderley Edge Golf course, shows the proposed site from the second fairway of the golf course. This shows trees between it and the site.



Photo 5

However, it does not show the view from the third fairway, that would have uninterrupted, unscreened views of the proposed site. See photo 5 as evidence. The view from the Council owned field below the proposed site would also be compromised. See photo 6 as evidence.



Photo 6

This would clearly affect the visual impact of the landscape, from a large number of views.



In conclusion:

We judge that LVA evidence is not sufficient to support the fact that the proposed development would not affect the visual impact over the ridgeline.

Further detailed analysis, conducted by our LVA consultant, underpins this objection.

10. Credibility of maintenance provisions.

There are two areas of concern:

10.1 Attenuation system.

The planning application provides no legally secured maintenance plan for the attenuation basin, piped drainage, flow controls or pumping infrastructure. No organisation has been shown to agree to adopt or fund the system. Without an adopted agreement, the drainage infrastructure may fall to a private management company or nearby residents.

This a major concern because:

- The system relies entirely on engineered and mechanical components.
- These require desilting, inspection, pumping and repair.
- Failure, even temporary, would increase flood risk to neighbouring homes.
- The cost of long-term maintenance is substantial and ongoing.
- Nobody has agreed to take liability if downstream residents suffer from flooding.

This is non-compliant with the NPPF and the non-statutory technical standards for SuDS, which require funded, enforceable maintenance for the lifetime of the proposed development.

A drainage scheme with no secured maintainer and no guaranteed budget is not sustainable, not safe and non-compliant.

10.2 Planting scheme and the country park.

There is a large amount of landscaping promised for the proposed development but there is no timing for the handover of responsibility for maintenance.

In common areas i.e. those not to be cared for by homeowners, it is indicated that the local authority will assume responsibility for this maintenance.

We question the credibility of this claim since it will involve the maintenance of grassed areas, wildflower meadows, hedges and trees, including the oaks on the site.



Further, there is no indication given, of how the “country park” will be made usable. The proposed park is currently rutted and dangerous to walk on and is not tenable for use by adults let alone children. This will require major work. Our view is that the “country park” is, in reality, 2 fields re-labelled, to suit the description of a recreational space. Unless major work is undertaken, it will be totally unusable.

Further, there is no indication of how the upper field of the park will be made usable after the attenuation tank has been constructed. It is inevitable that major work will be required to make this area in any way suitable as a recreation site.

As previously indicated, there is inadequate provision for preventing accidents when the park floods and there is no mitigation against golf balls flying from the 4th tee and the 5th fairway of Alderley Edge Golf Club in the south east corner of the lower field.

We note that the Golf Club has objected to this aspect of the proposed development.

Finally, there is no indication of who will be responsible for the upkeep of the proposed park in terms of cutting the grass and removing litter.

We note that Manchester Airport has objected to this planning application until a BHMP is submitted and approved by the LPA in conjunction with the aerodrome safeguarding said airport.

The airport specifically raises concerns over litter and the public feeding of birds, particularly gulls, ducks and geese, which are especially hazardous to aircraft.

11. Removal of productive arable land.

The proposed site, including the “country park” has been used on a continual basis for agricultural purposes. Crop rotation, interspersed with animal grazing to improve soil quality, has been practised over many years. Crops include, barley, oilseed rape and animal fodder.

This pattern of use has been changed since the developer purchased the land in 2023, since when, no attempt has been made to grow crops.

The developer’s consultant claim that the land is not 3A quality, rather 3B. We find this strange given the continued use previously, as productive farmland.

The report does state, however, neighbouring fields are 3A land and the soils in the area of the proposed development site show indications that the area has been continually farmed.

We believe the correct course of action to resolve this issue, would be for Cheshire East Council to forward the developer’s consultant’s report to Natural England for independent review to ensure the voracity of the claims are verified.



Without this reassurance, this productive farmland is in danger of being removed without due process being observed.

We note that Transition Wilmslow, under item 2 of their objection, has made a strong case for why the proposed development site must be considered as productive farmland.

12. Threat to the Local Green Space.

Our objection to the proposed site's development, is based on its proximity to the designated Local Green Space (LGS) namely the Welton Drive recreational field as follows:

12.1 National planning policy framework (NPPF).

Paragraph 108 of the NPPF confirms that designated LGS's are to be "managed in accordance with Green Belt policy". The proposed site abuts the protected LGS and would materially compromise its openness, amenity and recreational purpose. This is underpinned by para. 142 of the NPPF.

Further, as the proposed development would cause direct harm to the character, tranquillity and safe access of the LGS, it would engage a Footnote 7 constraint and must, therefore be determined under the protective policies (NPPF 108 and 142 above) of the Framework rather than the tilted balance provision.

As no "very special circumstances" have been presented to justify the encroachment on this LGS, this planning application must be treated as inappropriate and contrary to national policy.

12.2 Cheshire East Local Plan Strategy (CELPS).

CELPS Policy SD1 requires prospective development to protect and enhance the natural environment. SD2 sets out design expectations, including respect for landscape character and openness, whilst SE6 seeks to protect infrastructure assets and open spaces for their biodiversity, amenity and recreational value.

The proposed development would:

- Remove Green Belt land that serves as a visual and functional buffer to this LGS.
- Introduce visual encroachment and severance between existing open space corridors.
- Reduce this LGS'S visual containment and diminish its landscape quality.

In summary, the proposed development is inconsistent with CELP's strategic aims and would undermine the adopted spatial and environmental policy objectives.



12.3 Wilmslow Neighbourhood Plan (WNP).

The Welton Drive recreational field is formally designated as an LGS under Policy CR3 of the WNP. This designation followed robust local consultation and reflects its value to the local community.

The proposed development threatens to:

- Reduce the sense of openness and rural character currently enjoyed by current users
- Introduce directly overlooking and physical proximity of housing
- Vehicular activity at the edge of the LGS. n.b. The access runs along the entire length of the LGS.
- Boundary pressure will be increased and erosion of the natural edge of the LGS will be obvious.

12.4 Increased flood risk

- The proposed development sits on heavy clay soils (wetness class 4) and will significantly increase impermeable areas, leading to additional run off into the surrounding areas.
- The abutting LGS already suffers from ponding and saturation in winter months and this would only increase.
- Further, the proposed layout does not offer any hydrological buffer or containment measures to protect the LGS.

12.5 Public safety and access risk.

The proposed development submission fails to address the critical safety issues arising from the co-location of the proposed site with the existing footway into the LGS. This currently is a safe pedestrian-only access point at the end of Welton Drive, but will become a conflated access point for 81 new dwellings and current residents/visitors to the LGS. This will result in:

- Vehicular and pedestrian conflict
- Injury risk to vulnerable groups including children at play, elderly residents and users with sensory or mobility impairments.
- Loss of confidence in the safety of the LGS.
- The proposed site will render the entire area unsuitable for sustained residential vehicle use, construction and utility vehicles and the cumulative volume of pedestrian and cycle flows. Thus, the proposed site fails to meet the standards set in paragraph 117 (c) of the NPPF, which requires any development to be safe, inclusive and accessible for existing and future users.
- The proposed development effectively reclassifies a recreational pedestrian route as a vehicular spine road with no credible re-routing or mitigation. This is an unacceptable safety risk.



In conclusion:

The proposed site clearly represents demonstrable harm to this valued LGS and the surrounding area both for existing and future user and is contrary to the NPPF framework of 2024, CELPS and the WNP.

PROTECT BUTTERFLY BANK

Planning Application 25/3735/FUL



Plan: 8 Town Planning Ltd. Green Belt and Planning Policy Objection

Plan:8 Town Planning Ltd

Paul Wakefield
Planning Department
Cheshire East Council
Development Management
PO Box 606
Municipal Buildings
Crewe
Cheshire
CW1 9HP

Date: 8th December 2025

Objection to Planning Application 25/3735/FUL

Application Site: Land off Welton Drive and Stockton Road, Wilmslow, SK9 6EU

Proposal: Erection of 84 dwellings, creation of country park, public open space and associated works

Applicant: Jones Homes (North West) Ltd

Dear Mr Wakefield,

I am writing on behalf of my client, Protect Butterfly Bank, to register a formal objection to the above planning application on the following grounds:

- Inappropriate development in the Green Belt causing harm by reason of inappropriateness and loss of openness (NPPF paragraphs 153-154)
- Failure to meet the 'grey belt' definition under NPPF December 2024 paragraph 153a
- The land provides a strong contribution to checking the unrestricted sprawl of the large built-up area of Wilmslow (NPPF Purpose (a))
- The land also provides a strong contribution to preventing neighbouring towns from merging into one another (NPPF Purpose (b))
- There are weak, impermanent vegetation-based boundaries to the south, northeast and north that fail to meet NPPF paragraph 149(f) permanence requirements
- Abandonment of the existing strong and defensible settlement boundary at Welton Drive/Stockton Road
- The proposed 'country park' neither constitutes a defensible boundary nor provides very special circumstances to outweigh Green Belt harm
- The proposal conflicts with Development Plan policies including Cheshire East Local Plan Strategy Policy PG3 and SADPD Policy PG11

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- Precedent risk - approval would encourage successive applications for 'well-contained' Green Belt parcels leading to incremental urban sprawl

This objection is supported by detailed technical assessment of Green Belt policy and draws on relevant precedents including the recent refusal of application 25/1730/PIP for 9 dwellings on similar Green Belt land at the Wilmslow/Alderley Edge boundary, which confirms that Green Belt protections remain paramount even in contexts of housing need. Furthermore, recent appeal decisions demonstrate that Inspectors continue to dismiss inappropriate development in the Green Belt even where local planning authorities have significantly reduced housing land supply, reinforcing that Green Belt harm cannot be outweighed by housing delivery arguments alone.

The detailed assessment follows below.

GREEN BELT AND URBAN SPRAWL ASSESSMENT

This Assessment includes the following sections:

- A: Summary
- B: Site Description
- C: Planning Policy Framework
- D: Assessment Against Green Belt Policy
- E: Green Belt Boundaries and the Country Park Proposal
- F: Relevance of Application 25/1730/PIP Refusal
- G: Concluding Comments

Summary

1 This statement demonstrates that the proposed development of 84 dwellings on land southeast of Chesham Road and south of Stockton Road, Wilmslow, would constitute inappropriate development in the Green Belt that would cause substantial harm to Green Belt Purpose A - checking the unrestricted sprawl of large built-up areas and Purpose B - to prevent neighbouring towns merging into one another.

2 The site makes a strong contribution to Green Belt Purpose A under current Planning Practice Guidance criteria as the site is essential to limit the sprawl of a large built up area. Development would result in urban sprawl. The proposal would result in an incongruous pattern of development in the Green Belt, precisely the "incongruous pattern" that the guidance identifies as indicative of strong contribution

The site makes a strong contribution to Green Belt Purpose B as it forms an essential part of the gap between the towns of Wilmslow and Alderley Edge, and development would result in the loss of visual separation and the perceived merging of the two towns

3 We find that the application should be refused as inappropriate development causing substantial harm to fundamental Green Belt purposes without very special circumstances.

Site Description

4 The application site comprises approximately 10 hectares of agricultural land located on the southern edge of Wilmslow. Wilmslow is a large built-up area for the purposes of Green Belt policy. The site is positioned:

To the North West and West are Chesham Road and Welton Drive, forming the current settlement boundary with existing residential development beyond. To the North and North East beyond an agricultural field not identified in the application submission are Ashford Road and Westminster Drive, also forming the settlement boundary. We are advised that the agricultural field not included in this application submission is either owned or is under option by Jones Homes.

To the East and South: Bounded by field boundaries, Woodland with Whitehall Brook and Alderley Edge Golf Club beyond Beyond Whitehall Brook West: The A34 Melrose Way beyond which are parcels of land which are open within the Green Belt sited between Wilmslow and Alderley Edge. There are two parcels of land just on both sides of the A34 that are owned or under option by Bellway Homes and also by CEC. There is a recently refused planning in principle application 25/1730/PIP which sought nine houses on land to the south of the Whitehall Bridge Roundabout - between Alderley Road and the A34 (Melrose Way); this was refused as it was deemed contrary to Green Belt policy.

The image below shows the land in question in the context of Wilmslow and Alderley Edge:



5 The area features two agricultural fields defined by established boundaries and is completely free of any built development. Its distinctly rural character is accentuated by hedgerows and mature trees along its edges, enhancing the overall countryside atmosphere of Wilmslow. Highly visible from nearby footpaths, the site serves an important role as both a visual and spatial buffer, separating the urban zone from the open countryside.

6 The site features a relatively flat terrain that slopes steeply toward Whitehall Brook and the Alderley Edge Golf Course, located to the south and east. This open landscape enhances the overall sense of countryside and reinforces the feeling of openness that is characteristic of the Green Belt in this area.

7 The site is designated as Green Belt land within the North Cheshire Green Belt and forms part of the strategic gap separating Wilmslow from neighboring settlements. There is no previously developed land within the boundaries of the site. The land is currently used for agriculture and is classified as Grade 3, indicating it is of good to moderate quality and capable of consistently producing moderate to high yields of crops.

8 The red line of the proposed development includes 4 hectares identified for housing and 5 hectares proposed for open space, sustainable urban drainage and biodiversity enhancements.

9 Land immediately to the northeast of the red line as we understand is either owned or is under option by Jones Homes. A live application is in place for land owned by CEC to the east and land to the south of the CEC land is land owned or under option by Bellway Homes.

10 Any decision on the current application should be mindful of the possibility of nearby landowners, or those with options to purchase, seeking to increase site value with residential development planning applications.

Planning Policy Framework

11 This section includes a brief overview of the most applicable policies to the assessment of the proposed housing development within the Green Belt location. The review includes Cheshire East Council (CEC) policy, Government policy within the NPPF and PPG and Written Ministerial Statement.

Cheshire East Planning Policy - Cheshire East Local Plan Strategy 2010-2030 (Adopted 2017)

12 *Policy PG 3 - Green Belt:* Establishes that within the Green Belt, inappropriate development will not be approved except in very special circumstances. The policy confirms that the Green Belt will be protected from inappropriate development in accordance with national policy.

13 *Policy SD 1 - Sustainable Development in Cheshire East:* Identifies Wilmslow as a Principal Town in the settlement hierarchy, confirming its status as a large built-up area for Green Belt purposes. The site is not allocated for development in the adopted Local Plan Strategy Remains designated as Green Belt with no proposed boundary changes. No site-specific policies apply that would support residential development

National Planning Policy Framework (December 2024)

14 Paragraph 142: *"The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."*

15 Paragraph 143 establishes five Green Belt purposes, of which the following are relevant to this assessment:

a) to check the unrestricted sprawl of large built-up areas;

b) to prevent neighbouring towns merging into one another;

16 Paragraph 148: States: *"When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account..."*

17 Paragraph 155: States that where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments can be made through local plans or neighbourhood plans. It is worth noting that CEC do not currently have a need to release Green Belt land.

Planning Practice Guidance on Green Belt (Updated February 2025)

21 The PPG includes advice on the application or assessment of whether or not a proposal would result in harm to the main purposes of the Green Belt and whether the land would be considered to be Grey Belt. We focus on Purpose A, Urban Sprawl, we believe the proposal will lead to Urban Sprawl and we demonstrate the reasons below.

Purpose A Assessment Criteria - a) to check the unrestricted sprawl of large built-up areas; (Paragraph 005):

22 The guidance provides specific criteria for assessing contribution to Purpose A:

23 The definition of Grey Belt is provided: *"any assessment area that is not judged to strongly contribute to any one of purposes a, b, or d can be identified as grey belt land"*. This guidance clarifies that sites making a strong contribution to any of purposes a, b, or d cannot be classified as grey belt.

The Written Ministerial Statement (12 December 2024)

24 The Secretary of State for Housing, Communities and Local Government established explicit government policy on Green Belt matters. Key provisions include:

Grey Belt Definition: Land within the Green Belt that does not strongly contribute to any of Green Belt purposes a) checking sprawl, b) preventing coalescence, or d) preserving historic town character

Development Hierarchy: Brownfield sites first, grey belt second, with higher performing Green Belt protected from release outside the local plan process

Strategic Assessment: Local authorities must identify grey belt areas through strategic Green Belt assessments

25 The Statement explicitly protects higher performing Green Belt land from development proposals outside the plan process, which is directly relevant to this application.

Assessment Against Green Belt Policy

Purpose A: Checking the Unrestricted Sprawl of Large Built-Up Areas

26 The Planning Practice Guidance requires assessment of whether land contributes to checking sprawl through consideration of:

- Whether the land is free of existing development
- Whether physical features could restrict and contain development
- Whether it is adjacent to a large built-up area
- Whether development would result in an incongruous pattern

27 The site is entirely free of built development, comprising open agricultural fields with no structures or hardstanding. This absence of development is a key indicator of strong contribution to Purpose A.

28 The site directly abuts the built-up area of Wilmslow, a Principal Town in the Cheshire East settlement hierarchy. Wilmslow unequivocally constitutes a "large built-up area" for Green Belt policy purposes.

29 The existing boundaries - field hedgerows and Chesham Road/Stockton Road - provide visual delineation but lack the substantial physical infrastructure needed to genuinely contain future development. These boundaries could easily be breached or removed if development pressure increases. Whilst we acknowledge that the tree belt to the south east of the application site provides a level of containment it is not as adequate as the built environment. Furthermore the application site is open to the south, north and northeast.

30 Development of 84 houses on this site would create precisely the type of incongruous development pattern the PPG identifies. The proposal would project Wilmslow's built form southward into open Green Belt, creating an incongruous pattern of development rather than a rounded settlement edge.

Arup/Cheshire East Council Green Belt Assessment (2015)

31 The comprehensive Green Belt assessment undertaken by Arup on behalf of Cheshire East Council evaluated this site (referenced as parcel WM28) specifically for its contribution to Green Belt purposes.

32 Key findings relevant to Purpose A:

The parcel was assessed as making a "Significant Contribution" to checking urban sprawl

The assessment noted that development would "encourage further urban sprawl around the development"

It found the parcel does not "round off the settlement well"

33 No material changes have occurred in the intervening period that would alter these conclusions. The site retains its essential Green Belt characteristics and continues to perform the same strategic function.

LUC Landscape Character Assessment

34 The LUC assessment characterizes this area as having a distinctly rural nature despite proximity to suburban development. This finding reinforces that the site currently maintains Green Belt countryside characteristics that would be fundamentally altered by housing development.

Sequential Development Pressure

35 A significant concern for my clients is the precedent this development would set for further sprawl. Multiple factors increase this risk:

Jones Homes ownership: The agricultural field to the northeast (excluded from current application) is owned or optioned by Jones Homes, suggesting likely Phase 2 development

PIP application: Application 25/1730/PIP for 9 houses east of the site demonstrates active development pressure

Bellway Homes land: Land holdings south of CEC land represent further development potential once precedent is established

36 Once Chesham Road as a settlement boundary is breached, the logical containment line is lost. "Rounding off" arguments become progressively stronger for subsequent applications. This incremental boundary erosion is precisely the sprawl dynamic Green Belt policy exists to prevent.

Incongruous Development Pattern

37 The PPG explicitly identifies "incongruous pattern" development as indicating strong contribution to Purpose A. Definitions of incongruous include "not in harmony or keeping with the surroundings". Incongruous can also be described as: inappropriate; incompatible; unsuitable; out of place; discordant; and inconsistent.

38 The resultant pattern of development would result in:

84 houses as substantial development beyond settlement boundary
Projects into open agricultural land with no containment to the northeast, north and south
Creates exactly the sprawl pattern the guidance identifies as harmful
Breaches established Chesham Road/Stockton Road settlement boundary

39 The Planning Practice Guidance requires assessment of whether physical features "could restrict and contain development." The existing boundaries fail this test:

Hedgerows can be removed or breached
Field boundaries provide only visual screening, not development constraint
There is a lack of substantial infrastructure or built form barriers to prevent further urban sprawl

Conclusion on Purpose A

40 Given the guidance within the Arup and LUC assessments a clear conclusion can be made that residential development on this land of the scale proposed, would constitute an extension of Wilmslow into an area of currently undeveloped land which currently prevents the urban sprawl of Wilmslow. As such the application site strongly contributes to Green Belt purpose a.

41 It is clear at present that Chesham Road provides a clear, defensible settlement edge with development north of road forms coherent urban form. Agricultural land south of houses on Chesham Road maintains a rural character. The development would breach logical settlement boundary without replacement. Not only would it amount to urban sprawl that would be incongruous it would lead to further urban sprawl beyond the boundaries. Once the settlement boundary is breached by this development adjacent agricultural land, which is all either owned or under option by mass volume housebuilders (or a public body) becomes more vulnerable to development pressure.

Assessment against "Strong Contribution" Criteria:

42 The land is high performing and development of the land would lead to urban sprawl. According to planning policy the land should not be developed outside of a development plan review. As such the land is not Grey Belt and should still be afforded full protection of Green Belt policy to preserve openness.

Purpose B: Preventing Neighbouring Towns from Merging Into One Another

Alderley Edge: Evidence of Town Status

43 It is clear that Alderley Edge functions as a town rather than a village, meeting all the criteria that distinguish an independent settlement with urban characteristics.

Demographic Evidence:

Population: 4,777 residents

Population density: 1,157 persons per square kilometre, comparable to other recognised towns in Cheshire East

Infrastructure and Services (Full Town Amenities):

Retail and Commercial: Large supermarket (Waitrose), numerous independent shops, restaurants, cafes, and businesses forming a distinct commercial centre

Healthcare: GP surgery providing primary healthcare services

Education: Several schools serving the local community

Religious facilities: Multiple churches

Transport: Railway station with regular services, integrated bus routes

Employment: Significant local employment base with businesses, professional services, and retail operations

44 Functional Independence: Alderley Edge operates as a functionally independent settlement with its own economic centre, service provision, and community identity. It is not a dormitory village or suburb but a town with its own gravitational pull for services, employment, and community life. Residents can access essential daily services without travelling to Wilmslow or other settlements.

45 Historic Town Character: Alderley Edge has a long-established town centre with Victorian architecture, a defined high street, and a historical identity as a distinct settlement dating back to the 19th century railway development.

46 The distinction between Alderley Edge and Wilmslow as separate towns, rather than village and town, is relevant to the Green Belt assessment under Purpose B. The NPPF purpose b) specifically addresses preventing towns from merging, and Alderley

Edge clearly meets the threshold criteria for town status in terms of population, services, economic activity, and functional independence.

How the Development Would Close the Gap Between Towns

47 This development would significantly close the gap between the built forms of Wilmslow and Alderley Edge, directly contradicting Green Belt purpose b).

48 The PPG guidance provides assessment criteria to prevent towns merging into one another (Paragraph 005). Assessment areas that contribute strongly are likely to be free of existing development and include all of the following features:

Forming a substantial part of a gap between towns

The development of which would be likely to result in loss of visual separation of towns

Current Gap and Impact of Development

49 The proposed development site forms a critical part of the essential gap that maintains the separate identities of Wilmslow and Alderley Edge. Development on this site would:

Physical narrowing: Significantly reduce the physical distance between the southern extent of Wilmslow's built form and the northern extent of Alderley Edge

Visual coalescence: Create a visual perception of merged settlements when travelling along Chesham Road and from Stockton Farm, eliminating the current clear sense of leaving one town and entering open countryside before reaching another

Loss of countryside buffer: Eliminate the essential open Green Belt land that currently provides breathing space between the two settlements

Psychological merging: Erode the distinct identity of both towns by creating a perception of continuous development, even if a small physical gap remains

Cumulative Impact and Sequential Development Concerns

50 The danger of approving this application extends beyond its immediate impact. There is substantial evidence of sequential development pressures that would further close the gap:

Phase Two Development: The developer owns a lone field to the north east of the site which is not included in the current application. This field is likely to be

brought forward as phase two after the completion of this site, further extending development southward and narrowing the gap

Bellway Homes Land: The approval of this development is likely to embolden Bellway Homes to apply for planning permission on land they own to the south of CEC-owned land, creating further incremental closure of the gap

51 The cumulative effect of this development plus the anticipated follow-on developments would result in a substantial and irreversible narrowing of the gap between Wilmslow and Alderley Edge. What remains today as a clear separation with distinct town identities would be reduced to minimal separation, with the towns perceived as merged or merging.

52 This sequential erosion of the Green Belt gap is precisely what Green Belt policy is designed to prevent. Once this development is approved, it will be significantly more difficult to resist subsequent applications on adjacent land, as the precedent will have been set and the gap already compromised.

Supporting Evidence: Arup/CEC Assessment on Town Merging

53 The Arup/CEC assessment of WM 28 was also evaluated with regard to its contribution to the prevention of the closing of the gap between Wilmslow and Alderley Edge.

54 It found that the site made a significant contribution. The parcel forms a large, essential gap between the settlements of Wilmslow to the north and Alderley Edge to the south.

55 The assessment concluded that a reduction in the gap could lead to the perceived merging of settlements and development of this parcel would lead to a narrowing of the gap.

56 This professional assessment remains entirely valid today, as no changes have occurred in the intervening period that would alter the fundamental role this land plays in maintaining settlement separation.

Conclusion on Purpose B

57 This application fails on multiple critical points relating to Green Belt purpose b):

Alderley Edge clearly functions as a town with full urban amenities, population, infrastructure, and functional independence

The site forms a significant and essential part of the gap between the two towns of Wilmslow and Alderley Edge

The development will result in both physical narrowing and loss of visual separation between the two towns

The cumulative impact of this development plus anticipated sequential developments would result in the perceived merging of the settlements

The Arup/CEC 2015 assessment provides authoritative evidence that development of this site would compromise settlement separation

Approval would set a precedent making it impossible to resist further gap closure on adjacent land

E Green Belt Boundaries and the Country Park Proposal

58 We disagree with the applicant's case regarding a permanent, defensible Green Belt boundary. This section demonstrates why these features fail to meet the NPPF's stringent requirements for Green Belt boundary definition and why the existing settlement edge at Welton Drive/Stockton Road represents the appropriate, defensible boundary.

59 NPPF paragraph 149(f) is explicit that when defining Green Belt boundaries, local planning authorities should: *"define boundaries clearly, using physical features that are readily recognisable and likely to be permanent"*

60 Furthermore, NPPF paragraph 145 emphasises that Green Belt boundaries must have: *"intended permanence in the long term, so they can endure beyond the plan period"*. These are not aspirational statements - they are mandatory requirements. A boundary feature must be both readily recognisable AND likely to be permanent. Both criteria must be satisfied.

61 The applicant's Planning Statement argues at paragraph 5.12 that: *"dense trees and hedgerow line the southern boundaries of the site which would be retained as part of the proposals"*. However, it should be noted that the dense trees are only found to the southeast of the application site. The other edges to the south, north and east will be open or have weak containment with the odd tree and hedgerows which are inherently impermanent for multiple reasons:

- **Maintenance Dependency:** Trees and hedgerows require ongoing maintenance, management, and replacement. Without active stewardship, they deteriorate, become gappy, and eventually fail as boundary features.

- Disease Vulnerability: Current threats include ash dieback affecting up to 80% of ash trees in the UK, and historical precedents such as Dutch elm disease which destroyed the majority of elms. A single disease outbreak can eliminate an entire hedgerow species.
- Storm Damage: Extreme weather events - increasingly frequent with climate change - can destroy mature trees and hedgerows overnight. Recent storms have demonstrated this vulnerability across the UK.
- Land Management Changes: Trees and hedgerows can be legally removed through land management decisions, agricultural intensification, or future development pressures. Even with planning conditions, enforcement is difficult and boundaries can be degraded over time.
- Natural Change: Trees and hedgerows naturally change character through growth, aging, and eventual death. What appears as a 'dense tree line' today may be sparse and gappy in 30-50 years. They cannot 'endure beyond the plan period' as required by NPPF paragraph 145.

62 Planning practice guidance and appeal decisions consistently recognise that vegetation-based boundaries lack permanence. Inspectors favour hard infrastructure - roads, railways, watercourses, and built settlement edges - precisely because these features demonstrably endure. Tree lines and hedgerows, to the north, north east and south by contrast, are transient landscape features that fail the permanence test.

63 The applicant's own Planning Statement contains a fatal admission at paragraph 4.22, where it acknowledges that the 2015 Green Belt Assessment found: *"northern boundary currently prevents expansion of the existing residential area"*

64 The existing settlement edge at Welton Drive and Stockton Road already constitutes a strong, defensible boundary. It possesses all the characteristics required by NPPF paragraph 149(f):

- Clear and readily recognisable: The transition from built form to open countryside is immediately apparent. Any observer can identify where Wilmslow ends and the Green Belt begins.
- Permanent: Built settlement edges endure. The houses along Welton Drive and Stockton Road will remain for generations. They meet the NPPF requirement to 'endure beyond the plan period' far more effectively than any hedgerow.
- Based on substantial infrastructure: Roads, utilities, property boundaries, and built structures provide multiple overlapping physical features marking the boundary.

- Logical and defensible: The current boundary represents precisely what Green Belt policy intends - a clear demarcation between urban area and countryside. Moving this boundary 200+ metres south into open fields abandons this principle without justification.

65 The proposal therefore seeks to abandon a strong, permanent, defensible boundary in favour of a weaker boundary. This is precisely the opposite of what sound Green Belt policy requires.

66 At paragraph 5.12, the applicant's Planning Statement argues: *"The provision of a countryside park within parcel WM27 would also assist with creating a permanent, defensible boundary adjacent to the proposed built form."*

67 We disagree with this stance for several reasons:

- A country park is not a physical feature: NPPF paragraph 149(f) requires 'physical features that are readily recognisable and likely to be permanent'. A country park is a land use designation, not a physical feature. The physical features proposed - paths, planting, perhaps some benches - are not substantial infrastructure and certainly don't constitute a defensible boundary.
- Land use designations lack permanence: A country park can be reclassified, redesignated, or altered through subsequent planning applications. Management regimes change. Future landowners may have different priorities. The designation itself provides no physical permanence whatsoever.
- Country parks can themselves become development sites: Under certain circumstances, even designated open space can be released for development where the benefits are considered to outweigh the loss. If this country park is accepted as a boundary feature, what prevents a future application from arguing that the country park itself (or part of it) should be developed? The boundary would simply shift further south again.
- If accepted, the argument could apply anywhere: If a country park constitutes a defensible boundary sufficient to justify Green Belt release, then any Green Belt parcel adjacent to an area of open space could advance identical arguments. This would fundamentally undermine Green Belt protection across England.
- The true permanent boundaries lie further south: If Green Belt boundaries in this location genuinely require revision, the appropriate defensible features already exist: Whitehall Brook (approximately 200m south of the site) provides a permanent watercourse, and the A34 Melrose Way (approximately 370m south-southeast) constitutes a major dual carriageway already forming a western Green Belt

boundary elsewhere in Wilmslow. These are genuine permanent features that could endure beyond the plan period.

68 The country park proposal does not constitute a defensible boundary, it does not meet NPPF paragraph 149(f) requirements, and it does not provide very special circumstances to outweigh the harm from inappropriate development in the Green Belt.

69 The applicant references the 2015 Cheshire East Green Belt Assessment at paragraph 4.22, noting its description of 'southeastern edge of the site is heavily wooded and presents a defensible boundary'. However, this is at odds with the purpose and findings of that Assessment:

- The Assessment evaluated EXISTING boundaries: The 2015 Assessment was examining whether the current Green Belt designation properly ends at defensible features - i.e., whether the existing Green Belt boundary is appropriate. It was not concluding that the wooded edge would constitute an appropriate NEW settlement boundary following development.
- The Assessment found WM28 makes 'Significant Contribution': Critically, the 2015 Assessment (paragraph 4.21 of the Planning Statement) found parcel WM28 makes a 'Significant Contribution' to Green Belt purposes. This is the opposite of an invitation to develop the site.
- Description vs Recommendation: The Assessment's reference to wooded edges describes site characteristics - the existing situation. It does not recommend that development should occur up to these tree lines.

70 If the weak boundaries to the south, north east and east and country park are accepted as defensible boundaries sufficient to justify Green Belt release, the implications extend beyond this single site:

- Multiple parcels along Wilmslow's Green Belt edges could advance identical arguments - 'we have tree lines', 'we'll create a country park', 'we're partially enclosed'.
- Each released parcel makes the next release easier, as the approved development itself becomes part of the 'enclosure' argument for adjacent sites.
- The adjoining parcel WM27 (where part of the country park is proposed) becomes an obvious next phase, with developers able to argue the same points about boundaries and containment.
- This represents incremental erosion through successive 'well-contained' sites, each individually argued to have minimal impact, but cumulatively resulting in substantial urban sprawl.

- The fundamental purpose of Green Belt policy - maintaining permanent boundaries that check sprawl - is defeated if boundaries can be progressively shifted based on vegetation and proposed land uses rather than substantial permanent features.

71 The existing settlement boundary at Welton Drive and Stockton Road represents precisely where Wilmslow ends and the countryside begins. It is clear, permanent, and defensible - meeting all NPPF requirements. This is inappropriate development extending beyond the defensible boundary that currently contains Wilmslow.

F Relevance of Application 25/1730/PIP Refusal

72 Application 25/1730/PIP sought Planning in Principle for 9 dwellings on Green Belt land at the Wilmslow/Alderley Edge boundary. This application was refused by Cheshire East Council, and the decision provides direct support for refusing the current Jones Homes proposal for the following reasons:

- Both sites constitute inappropriate development in the Green Belt causing harm by definition (NPPF paragraph 153)
- Both sites are located on the strategic gap between Wilmslow and Alderley Edge, contributing to preventing settlement merger
- Both applications attempted to argue that sites were 'well-contained' or partially enclosed by existing development
- Both failed to demonstrate very special circumstances sufficient to outweigh Green Belt harm
- Neither site met the 'grey belt' definition under NPPF December 2024 paragraph 153a, being open agricultural land making a positive contribution to Green Belt purposes

73 The refusal of 25/1730/PIP confirms several principles directly applicable to 25/3735/FUL:

- Scale is not determinative: If 9 dwellings on Green Belt land warrant refusal, then 84 dwellings on Green Belt land making similar contributions to Green Belt purposes must also be refused. The harm from inappropriate development is not eliminated simply because more houses are proposed.
- 'Containment' arguments insufficient: The Council rejected arguments about partial enclosure or visual containment in the PIP application. The same arguments advanced by Jones Homes - about golf courses, existing development to the north, and wooded boundaries - did not overcome Green Belt policy in the PIP case and should not do so here.

- Grey Belt provisions tightly defined: Both applications demonstrate that the NPPF December 2024 'grey belt' provisions at paragraph 153a have a narrow scope. Land that makes a positive contribution to Green Belt purposes - preventing sprawl, preventing merger, maintaining countryside character - does not meet the grey belt definition simply because applicants characterise it as 'low quality.'
- Housing need does not override Green Belt policy: The Council refused the PIP application despite Cheshire East's acknowledged housing land supply challenges. This confirms that housing delivery arguments alone do not constitute very special circumstances sufficient to outweigh Green Belt harm.

74 The refusal of 25/1730/PIP establishes a clear precedent for how Cheshire East Council assesses inappropriate development on Green Belt land in this locality. To approve 25/3735/FUL would represent an inconsistent approach to materially similar circumstances and would undermine the integrity of the Development Plan.

75 If the Council determined that 9 dwellings on Green Belt land making a strong contribution to preventing sprawl and merger warranted refusal, then 84 dwellings on Green Belt land with comparable characteristics must logically be refused for the same reasons. The differential is one of scale, not principle - and the greater scale here amplifies the harm rather than mitigating it.

76 Recent appeal decisions across England demonstrate that Planning Inspectors continue to dismiss inappropriate development in the Green Belt even where local planning authorities have significantly reduced or exhausted housing land supply. Key principles emerging from recent appeals including appeal decision APP/C3430/W/25/3363067 that where councils have substantially less than a five year supply of housing the openness and permeance of the green belt is given significant weight where:

- Council performing well against Housing Delivery Test, as Cheshire East has
- The land is not considered to be grey belt
- Housing need, or lack of a five year supply, is not determinative alone.

G Concluding Comments

77 The applicant claims the site constitutes "grey belt" land suitable for development under paragraph 155 of the NPPF; we disagree. Current Planning Practice Guidance states: *"any assessment area that is not judged to strongly contribute to any one of purposes a, b, or d can be identified as grey belt land"*

78 Our assessment is that the land strongly contributes to both Purpose A and Purpose B under current guidance criteria. We base this not just on our own analysis but also after reviewing the Cheshire East Council / Arup 2015 Green Belt review and LUC Character Assessment. The application site is noted as having a "Significant Contribution" to checking urban sprawl and to preventing the merging of Wilmslow and Alderley Edge. The land cannot be classified as grey belt due to strong contributions to Purposes A and B.

79 We note that CEC has a 3.8-year supply of housing which is clearly lower than the required 5 year supply. However this should be assessed in light of previous Housing Delivery by CEC where recent delivery has been 2.6 to 3 times housing requirement. Housing need has consistently been met through appropriate non-Green Belt sites. This is important when considering the December 2024 Written Ministerial Statement which establishes explicit government policy protecting higher performing Green Belt land from development proposals outside the plan process. The PPG also requires the following hierarchy is applied:

1. Brownfield sites (first priority)
2. Grey belt land (second priority)
3. Higher performing land (protected from release outside local plan process)

80 The application proposed does not comply with this policy as it seeks permission outside plan process for higher performing land. The evidence from Arup and LUC clearly direct that the application site falls within the "higher performing land" category as it has the following functions:

Strong contribution to Green Belt Purpose A under Planning Practice Guidance criteria

Strong contribution to Green Belt Purpose B - preventing towns merging

"Significant Contribution" confirmed by Arup/CEC strategic assessment

Grade 3 agricultural land providing productive countryside

Essential role in maintaining Green Belt openness and preventing sprawl

81 We conclude that the proposal fails multiple levels of Green Belt policy and government guidance:

1. Results in urban sprawl: The land makes a strong contribution to checking sprawl under Planning Practice Guidance

2. Leads to town merging: The land makes a strong contribution to preventing Wilmslow and Alderley Edge from merging
3. Incongruous Development: Creates precisely the incongruous pattern guidance identifies as harmful
4. Agricultural Land Loss: Would remove Grade 3 agricultural land fundamental to Green Belt openness
5. Is not a sustainable location as required by paragraphs 110 and 115 of the NPPF

82 It is worth reiterating that paragraph 148 of the NPPF advises that where release of green belt land is necessary the priority should be for previously developed land. Only then grey belt land and then other Green Belt locations. The policy within paragraph 148 also explicitly requires that development should be in a sustainable location in line with guidance within paragraphs 110 and 115 of the NPPF. The location is not sustainable and there are no measures tabled that would make the application sustainable. The proposal represents inappropriate urban sprawl onto higher performing Green Belt land that would result in the merging of two towns, which current government policy exists to prevent.

83 For all the reasons set out, we respectfully request that Cheshire East Council refuse planning application 25/3735/FUL. The proposal constitutes inappropriate development in the Green Belt causing substantial harm by reason of inappropriateness and loss of openness, with no very special circumstances demonstrated to outweigh this harm. The application is contrary to national Green Belt policy (NPPF paragraphs 143-156) and Development Plan policies (CELPS Policy PG3, SADPD Policy PG11).

Yours sincerely,



Simon Plowman MA MRTPI for Plan:8 Town Planning Ltd at the request of Protect Butterfly Bank.

PROTECT BUTTERFLY BANK

Planning Application 25/3735/FUL



Shepherd Gilmour Infrastructure Ltd. Flood Risk Assessment & Drainage Strategy Objection

CI908/RBG/2025255

28/11/2025

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Objection to the Submitted Flood Risk Assessment and Drainage Strategy

Dear Flood Risk and Drainage Team

Re: Full Planning 25/3735/FUL for the Proposed Residential Development comprising 84 dwellings, public open space and parkland and associated works.

I am writing on behalf of my Client, Protect Butterfly Bank, to register a formal objection to the above application on the grounds of that the submitted Flood Risk Assessment (FRA) and Drainage Strategy for the proposed development are technically incomplete and non-compliant with the key requirements of the National Planning Policy Framework dated 2024, the Planning Practice Guidance (Flood Risk and Coastal Change) and Cheshire East Local Flood Risk Management Strategy.

While the FRA provides a general commentary on flood risk sources, it fails to demonstrate that the proposed development will be safe for its lifetime without increasing flood risk elsewhere, as required under the National Planning Policy Framework (NPPF).

Principal Ground for Objections

I. Flood Zone 3 and Sequential Test Non-Compliance

- The FRA states that part of the southern site (country park) lies within the Flood Zone 3, adjacent to Whitehall Brook
- The claims that the Sequential Test 'passed' is unsubstantiated – no floodplain mapping, finished levels or cross sections are provided to confirm that no development or regrading occurs within Flood Zone 3.
- Flood Risk assessment does not allow for the required climate change.
- Land raising, drainage works and public footpath proposed in the park may reduce the floodplain storage capacity. Non-Compliance with NPPF Paragraph 175 - stating that any construction works are proposed within any areas susceptible to flooding from any sources will require undertaking a Sequential Testing.
- Sequential and Exception Tests have not been adequately evidenced.



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2. Surface Water Flooding and Land Raising Risk

- The areas of medium-high surface water flood risk are identified within the site.
- The FRA proposed to raise ground levels and incorporate into drainage system without modelling the floodplain displacement or overland flow diversion effects.
- No exceedance flow route plan or 2D surface water model has been provided
- Land regrading and surface water management are untested and could increase flood risk to the adjacent land.

3. Groundwater Risk and Lack of Investigation

- The FRA acknowledges no site investigation and groundwater monitoring has been undertaken despite Alluvium and Till deposits and a Secondary B Aquifer.
- The FRA lacks empirical evidence to justify this claim.

4. Unverified Surface Water Discharge and Attenuation

- The proposed discharge of 16.4 l/s (2166m³ storage) is not supported by detailed calculations, FEH data or hydraulic modelling. Incorrect Climate Change Allowance has been used to assess the required storage volume.
- Discharge points to Whitehall Brook and United Utilities sewer are 'awaiting confirmation'.
- The Microdrainage results are preliminary quick storage estimates and not verified network design.
- Proposed discharge into the United Utilities sewer does not comply with the drainage hierarchy outlined in the National Policy Planning Framework (INPPF).
- Attenuation requirements and run-off rates are unsubstantiated, compliance with Defra Standards S2-S7 cannot be confirmed.

5. Incomplete SuDS Design and Missing Water Quality Treatment

- The FRA lists SuDS options (swales, basins, permeable paving) but provides no SuDS layout, treatment train or flow routing.
- There is no demonstration of water quality compliance (two treatment stages required as per CIRIA C753).
- The SuDS hierarchy is not evidenced with infiltration being dismissed without appropriate testing.
- The SuDS scheme is non-compliant with CIRIA C753, Defra SuDS Standards S1-S4, and Cheshire East SuDs Guidance.

6. Maintenance and Adoption Ambiguity

- The FRA simply states that the system 'will be offered under S104' but doesn't define who maintains non-sewer SuDS features (ponds, swales, permeable pavement)
- Absence of long-term management plan contravenes Defra Standards S14 and NPPF.

7. Foul Drainage Reliance on Pumped Solution

- The submitted FRA contains inconsistent and incorrect details regarding foul drainage proposal. In section 8.2. the FRA refers to the total of 112 dwellings when calculating foul discharge rates (5.6l/s), despite the Planning Application and development description confirming that only 84 dwellings are proposed. This error indicates that the foul water flow assessment is based on incorrect input data,



which undermines the accuracy of the design flow rates and the sizing of foul infrastructure.

- The FRA proposed that majority of the dwellings will discharge via a pumped foul drainage system into the United Utilities sewer on Stockton Road yet provides no technical justification or resilience measures such as emergency offline storage capacity, telemetry and remote alarm monitoring, standby power provision in the event of failure or adoption and maintenance responsibility confirmation.
- Conflict with Building Regulations Part H and EA PPG, both of which require that foul drainage systems prioritise gravity solutions and include resilience and emergency provisions where pumping is unavoidable.

8. Climate Change and Cumulative Impacts

- The FRA states that surface water attenuation has been designed using 40% climate change allowance, yet this is not correct requirement for this location. Under the current EA guidance, and Cheshire East SFRA the appropriate upper-end allowance for residential development is 45%.
- By applying a lower allowance than required, the FRA significantly underestimates the necessary attenuation volume. No evidence is provided that 45% sensitivity test was carried out, nor that the proposed storage volumes remain adequate under the correct design parameters.
- The FRA fails to assess cumulative impacts from other upstream and adjacent Wilmslow developments that also drain towards Whitehall Brook, including recent and allocated sites in the Local Plan.
- The NPPF requires to assess whether the development could contribute to combined downstream risk when considered alongside other growth. This omission means that the FRA does not demonstrate that runoff from this development will not increase flood risk to third parties downstream, contrary to national policy.

Conclusion

The submitted FRA contains factual errors, uses incorrect climate-change allowances, misidentifies the Local Authority, and lacks the hydraulic evidence required to demonstrate that the development will be safe or that flood risk will not be increased elsewhere. As a result, the assessment does not comply with the NPPF, PPG, EA Standing Advice or LLFA requirements and cannot be relied upon for decision-making.

Given these unresolved technical deficiencies, the application should be **refused** until a fully revised, site-specific and technically robust FRA is submitted that meets national and local policy standards.

Yours sincerely,
SHEPHERD GILMOUR INFRASTRUCTURE LTD

Renata Bochenek-Gasiorkiewicz
Associate Civil Director

PROTECT BUTTERFLY BANK

Planning Application 25/3735/FUL



Shepherd Gilmour Infrastructure Ltd. Transport Statement Objection

CI908/RBG/2025256

01/12/2025

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Objection to the Submitted Transport Assessment

Dear Highways Team

Re: Full Planning 25/3735/FUL for the Proposed Residential Development comprising 84 dwellings, public open space and parkland and associated works.

I am writing on behalf of my Client, Protect Butterfly Bank, to register a formal objection to the above application on the highways and transportation grounds, having carefully reviewed the Transport Assessment (TA) prepared by Focus Transport Planning (August 2025).

While the report concludes that the scheme will not have a 'severe' impact, several aspects of its analysis appear incomplete and inconsistent with the local conditions.

Principal Ground for Objections

1. Inadequate Traffic Impact Assessment

The TA significantly underestimates trip generation and fails to consider realistic travel behaviour for local residents. The trip rates used in assessment are taken from TRICS database without transparency on comparator sites. Local car ownership is high, and the public transport usage is low, and the proposed site's commuters' profile is assumed to be car dominated.

Peak hour forecasts of 46 two-way trips (less than one per minute) are not credible given the size of the scheme, the proportion of the proposed family housing, and the likely volume of school and non-work trips.

Also, no robust sensitivity testing has been carried out to reflect higher trip rates or short duration peak surges typical for the morning school and work commute.

2. Unsuitable Access via Welton Drive

The access proposal relies almost entirely on Welton Drive, a narrow residential cul-de-sac. Post-development the traffic along this road would be more than double, passing directly in front of the existing houses with limited off-street parking.



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This would increase noise, congestion, and road safety risks, particularly for pedestrians and children walking to nearby schools.

The TA fails to consider these amenity impacts or provide a swept path analysis for larger vehicles such as refuse and delivery vehicles.

The secondary 'emergency access' off Stockton Road relies on bollard control, which raises operational reliability concerns and provide minimal traffic relief.

3. Insufficient Assessment of Cumulative Impacts

Although the TA references other committed developments, the cumulative testing underestimates the combined impact of multiple major housing and employment sites in south Wilmslow.

Traffic conditions at Knutsford Road/Alderley Road/Bedells Lane roundabout are already approaching its capacity and any further increase will likely lead to queuing and delay.

The stated in the report increases of 'less than one vehicle per minute' are unsupported by model evidence and are therefore unreliable.

4. Overstated Sustainable Travel Opportunities

The TA asserts that the site is accessible by walking, cycling and public transport, yet provides no detailed audit of these routes.

Footways along Fulshaw Park South and Stockton Road are narrow, discontinuous and poorly lit, especially in winter months.

Bus frequencies in the area are limited and unlikely to provide a realistic alternative to private car use for most residents.

Without guaranteed infrastructure improvements these assumptions/assessments are aspirational rather than deliverable.

5. Limited Road Safety Analysis

The road safety review is based only on recorded personal injury accidents from 2019-2023, a period affected by pandemic related traffic reductions.

The analysis ignores near-miss incidents, on-street parking hazards, and future risks to pedestrians and cyclists arising from increased traffic on narrow estate roads.

No independent Stage I Road Safety Audit is provided for the proposed site access or pedestrian crossings, contrary to best practice.

6. Missing Design and Infrastructure Detail

Key details such as the design of pedestrian improvements, crossing points and junction geometry are not included. There is no indication of S278 funded works or highway adoption commitments.

7. Policy Inconsistency

Paragraph 116 of the NPPF states that the proposed development should be refused where the residential cumulative impact on the road network would be severe. Given the lack of sufficient information identified above, the scheme fails to demonstrate that the development would not have such an impact.



Also, it is believed that the proposal does not align with Cheshire East Local Transport Plan objective to reduce car dependency and prioritise safe, sustainable transport.

8. Design and Planning Issues

8.1. Access & Manoeuvring

- Single 5.5m access via Welton Drive – The refuse plan shows collection vehicles using the same estate spine road that serves all the traffic. This confirms that all servicing (including HGV refuse lorries) must pass existing dwellings on Welton Drive. This reinforces concerns about noise, obstruction, and safety on what is currently a quiet cul-de-sac.
- Turning geometry is not demonstrated – The proposed plan illustrates a general 'refuse vehicular route' but doesn't provide a swept-path analysis or vehicle tracking details.
- Emergency link overlap – The extension of the existing farm track, proposed as a shared access to 3no plots and emergency link of 3.7m width also appears on the proposed refuse route plan. This link is bollard controlled, with bollard proposed at the start of the turning head. It is unclear of how the refuse or emergency vehicles will gain access through or manoeuvre around to drive away.

8.2. Collection Points and Drag Distances

- Multiple bin collection points are shown, but there are no dimensions confirming that drag distances from individual plots to collection points meet Building Regulations Part H6 (maximum 25m from the waste collection point specified by the waste collection authority).
- Some plots – especially those along the private drive or cul-de-sac head appear to be more than 25m away from the collection point, what means the residents may need to wheel the bins excessive distances.

8.3. Emergency Vehicle Access Issue

- The refuse plan shows the Emergency Vehicle Access from Stockton Road widened to only 3.7m with bollards. This width may be inadequate for a 2.5m refuse vehicle or 3.1m fire engine, especially if there are cars parked on the side of the road.
- Therefore, it is assumed that proposed layout potentially depends on the Welton Drive access, leaving no secondary servicing route.

9. Unregistered Land

There is an unresolved dispute regarding the ownership of the land located on the back of the cul-de-sac Welton Drive that is included within the proposed development boundary. This is an area on which the boundary/retaining wall is located along with the adjoining unregistered triangular strip. This land has a conflicting boundary evidence and is currently the subject of registration applications with Land Registry.

Cheshire East Council has previously denied the responsibility for this land, however, later objected to registration on the basis that it is in ownership of CEC Highways, while at no point undertaking any maintenance.

Until ownership is formally determined, the inclusion of this land within the proposed development boundary is inappropriate and premature. It also raises significant uncertainty about whether the applicant has control of all land required to implement the scheme.

10. Existing Parking Pressure and Restricted Vehicle Movements on Welton Drive and Stockton Road.

In addition to the concerns already raised, both Welton Drive and Stockton Road already experience significant on-street parking pressure with vehicles routinely parked on both sides of the carriageway for long period, often years, due to the limited availability of the private drives and off-street parking within the existing estate. This creates a ‘single-lane traffic’ environment in several locations, particularly at the cul-de-sac head of Welton Drive, where the roadside parking severely restricts the two-way flow and forces the vehicles, including delivery vans, emergency vehicles and refuse lorries to undertake complex manoeuvres or wait for the oncoming traffic to clear. The Transport Assessment and the Refuse Layout drawing fail to acknowledge or assess the existing constraint. Introducing substantial additional traffic, service vehicles and construction movements into this already constrained environment would result in congestions, obstruct emergency access, and increase safety risks for pedestrian. The assessment of the network performance is therefore incomplete, as it does not reflect the real operating conditions on these narrow and heavily parked residential streets.



Welton Drive Cul-de-sac



Welton Drive



Welton Drive



Welton Drive towards Knutsford Road

A recent photographs of Stockton Road/Knutsford Rd and Welton Drive/Knutsford Rd junctions (attached below) illustrate the problems already experienced on this narrow, bending section of the roads. Large vehicles frequently stop or park close to the junctions, as shown in the images, which restricts sightlines, forces vehicles onto the wrong side of the carriageway, and creates a serious conflict point for the drivers and pedestrians. This is a routine occurrence, not an isolated incident.

The Transport Assessment does not account for these real-world constraints, nor does it assess how construction vehicles, refuse vehicles, delivery vans or additional residential traffic from the proposed 84 dwellings would safely pass through this junction under such conditions.



Stockton Road / Knutsford Road Junction



Welton Drive / Knutsford Road Junction



Conclusion

For the reason outlined above, it is considered that the submitted Transport Assessment is incomplete and unreliable. The proposal would generate harmful traffic, parking and safety impact along Welton Drive and the surrounding network, contrary to the principles of safe and suitable development.

Also, the submitted Refuse Layout drawing does not provide a sufficient or safe servicing arrangements and therefore fails to demonstrate compliance with national and local design standards.

I therefore respectfully request that Cheshire East Council **refuses** the application on transport and highways ground unless a comprehensive and independently verified Transport Assessment is undertaken, supported by a full Road Safety Audit and clear mitigation proposals.

Yours sincerely,
SHEPHERD GILMOUR INFRASTRUCTURE LTD

Renata Bochenek-Gasiorkiewicz
Associate Civil Director

PROTECT BUTTERFLY BANK

Planning Application 25/3735/FUL



Shepherd Gilmour Infrastructure Ltd. Arboricultural Statement Objection

CI908/RBG/2025257

01/12/2025

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Objection to the Submitted Arboricultural Statement

Dear Sir/Madam,

Re: Full Planning 25/3735/FUL for the Proposed Residential Development comprising 84 dwellings, public open space and parkland and associated works.

I am writing on behalf of my Client, Protect Butterfly Bank, to register a formal objection to the above application on the grounds that the Arboricultural Statement prepared by Cheshire Woodlands in September 2025, and associated documents fail to demonstrate that the development can be undertaken without causing significant, permanent and unacceptable harm to existing trees, hedgerows, landscaping character and biodiversity.

Principal Ground for Objections

I. Insufficient Protection and Assessment of Veteran Quality Trees

The Arboricultural Statement identifies that Group 13 and G15 include trees with veteran features. Veteran trees are under the highest level of protection under the NPPF Paragraph 193 (c), which states that the proposed development resulting in loss or deterioration of veteran trees should be refused unless wholly exceptional.

Despite this the proposed scheme:

- Does not provide a veteran tree specific mitigation
- Fails to assess the potential deterioration caused by changes in hydrology, ground levels pr adjacent construction activities
- Overlooks risks arising from the increased pressure due to the proximity of the built development and future residents.



Registered in UK as Shepherd Gilmour Infrastructure Ltd No. 2713503
Registered address: Maxwell House, Liverpool Innovation Park, Edge Lane, Liverpool L7 9NJ



2. Unjustified Loss of B Category Trees and Historic Hedgerows

The proposal includes removal of Group G5 (B category) and few sections of hedgerows (H3, H6, H13, H16, H17, H19) as well as the full removal of H14 and H15. These hedgerows are long established field boundaries that contribute significantly to the rural character of Stockton Farm.

The Arboricultural Statement provides no assessment as required under the Hedgerow Regulation 1997. In accordance with this regulation, the existing hedgerows are classed as 'important' as they have existed for over 30 years and no attempt has been made to retain or integrate these features into the layout.

The proposed removal of the trees and hedgerows is not justified and would harm the site's landscape character and ecological value.

3. Lack of Detailed Assessment of Construction Impacts on Root Protection Areas (RPAs)

The development encroaches into the RPAs of several retained trees (T6, T21, T22, T25, T26). However, no engineered construction specification is provided and the extent of the RPA encroachment is not quantified. Also, compliance with the BS5837:2012 can't be verified and prevent the LPA from assessing whether retained trees can be safeguarded.

4. The Proposed Development Layout is Not Informed by Tree Constraints

The Arboricultural Statement indicates that several trees require crown lifting or pruning solely to accommodate the proposed roads and housing layout. This suggests that the layout has been designed around the development rather than existing natural assets, contrary to the principles of BS5837 and sustainable design.

5. Excessive Reliance on Planning Conditions

The Arboricultural Statement assumes multiple essential details to later planning conditions, including:

- Engineering specifications for construction within the RPAs
- Hardsurfacing design
- Construction Methodology
- Underground services routing

These are critical to determine whether harm can be avoided. Assumptions regarding key arboricultural information prevents proper assessment at application stage and is contrary to the requirements for validated submission.

Conclusion

For the reason stated above, the Arboricultural Statement fails to demonstrate that the proposed development can occur without unacceptable harm to trees, hedgerows, wildlife and landscape character.



Shepherd Gilmour
Consulting Engineers

The proposal is contrary to the NPPF, Hedgerow Regulations 1997, British Standards BS5837 and relevant local planning policies on biodiversity, trees and landscape protection.

I therefore respectfully request that the LPA refuse the application.

Yours sincerely,
SHEPHERD GILMOUR INFRASTRUCTURE LTD

A handwritten signature in blue ink, appearing to read 'RKG'.

Renata Bochenek-Gasiorkiewicz
Associate Civil Director

PROTECT BUTTERFLY BANK

Planning Application 25/3735/FUL



Gavin Dawber EngTech MICE BEng Planning Documents Review

Review of Jones Homes Proposal for 85 New Homes

CIVIL ENGINEERING REVIEW FOR THE PROTECT
BUTTERFLY BANK COMMITTEE

GAVIN DAWBER ENGTECH MICE BENG

FAO:

Paul Wakefield

Head of Planning and Housing

Development Management

Cheshire East Council

PO Box 606

Municipal Buildings

Crewe

Cheshire

CW1 9HP

Planning Reference: 25/3735/FUL

Address: Land Off Welton Drive and Stockton Road, Wilmslow

Dear Sir/Madam,

Please find below my review of the Jones Homes proposed development on the above planning reference number.

As a practicing Civil Engineer, and having worked in multiple sectors within the industry, I have been able to use my knowledge and experience to come to the below conclusions and review the anomalies within the planning documents.

Landscape and Visual Appraisal - 16049 R03b

- Photoviewpoints: Photos state Wilmslow Golf Course, this is incorrect and should be Alderley Edge Golf Course
- Photoviewpoints 2: Shows “Dwellings on Chesham Road” but no marker for Chesham Close dwellings
- Photoviewpoints 1: House on Stockton farm not labelled but labelled in other photos
- Photoviewpoints 7: Arrow for “Dwellings on Stockton Road” misplaced
- Photoviewpoints 8: “Vegetation associated with B5359 Wilmslow Road” should be Alderley Road
- Landscape Strategy Plan:
 - Proposed Central Open Space: This is not central and will not be visible from most of the site therefore not creating a focal point; also compared with the whole scheme area, the area is small and with the retained trees, will not be able to provide a large focal area
 - Public access through the “country park” area: The connections as mentioned are not possible where shown, the footbridge in the south west corner of the park area does currently not exist and the footpath diverts through the golf course; there isn’t any link across the river at present, this is something that would have to be re-established by Jones Homes to facilitate this and agreed with PROW team at Cheshire East Council.
 - Section 1.7: It is located in the Chonar Landscape as designated by the Wilmslow Neighbourhood Plan (therefore locally designated)
 - Sections 1.10 and 1.11 seem to contradict each other in regard to the PROW’s in the area
 - Section 2.8 – The Fulshaw Park Design Guide (FPDG) states “any new development should include proposals for a high proportion of soft landscaping” – this proposal by Jones Homes, has a significant lack of open space around where the houses are proposed to be built; they have tried to mitigate this by having a “country park” area, but this land is currently open and soft landscaping already, so this cannot be used to meet the FPDG statement for the whole site
 - Section 2.12 – States the site is “achievable and developable” for up to 139 dwellings” but this has already been shown not to be achievable after the retracted Planning Application from 2015 after local opposition.

- Cheshire East SHLAA document states it is developable with a Policy Change. But there hasn't been any policy change which would affect this area – The site does not meet the criteria for Grey Belt.
- Section 2.14 is a statement to remove any further need for reporting into the CEBDG as a number of the comments from CE are applicable:
 - Contest and environments into which they are set (open landscape, design to match FPDG).
 - Logical design (affordable home layout as objected to by the Housing Officer).
 - Deliver quality developments (Do high volume developments also give quality developments... the sharp rise in “Snag Doctors” for new build houses would so otherwise – research shows that the number of issues per house has nearly doubled since 2005.[Rise in Snag Doctors Research Media Article](#))
- Section 2.14 also states the requirement to priced High Quality design – Section 2.13 does not state “high” anywhere.
- Section 3.5-3.68 contradict the statement in Section 1.7
- Section 3.24 – Perceptual (Scenic) states “Internally, the Site appears to have no more than an ordinary visual appeal, comprising grassland with vegetated boundaries” but the fields are used for grass growing and also for crops
- Section 3.24 - Perceptual (Wildness and Tranquillity) - The Site is not valued for tranquillity – can TG confirm how this is measured? When
- Section 3.24 – what is the matrix TG have used to give each section a low/medium etc value?
- Section 3.68 contradicts the fact the area is in the Chonar landscape
- Section 6.35 states that the “built form is set back from the existing dwellings by approximately 15m”, the nearest property is 45m from the site boundary.

Proposed-pumping-station-1464-DEV-PUMP-01

- Padlock arrangement is incorrect specification (Welsh Water not United Utilities); UU is the local water authority and WW has no authority in the area.
- What is the permeable hardstanding made of
- This is a site-specific plan and elevation drawing but states “flowmeter chamber where required”

Planning and Affordable Housing Statement:

As Jones Homes are stating that the open space to the south side of the site will be a country park; Do Jones Homes want to make this an official Country Park as per The Countryside Act 1968; If they do the Act states “a country park should have some formal amenities such as: car park, toilets, maybe a cafe or kiosk, paths and trails, and some information for visitors” – this Country Park only has one circular path. They do seem to want to make it a Country Park otherwise the term “Open Space” or “Park” would have been used.

23-52-Stockton-Farm-Street-Scenes-Sections

- The design of the housing is not conducive to following the FPDG – they are generic Jones Homes designs with no localised design included into them

Refuse-Layout

- No notes on what size of refuse vehicle has been used to get vehicle routes – it is noted in the objection by Cheshire Fire and Rescue that the incorrect size of fire vehicle has been used. It needs to be confirmed that the correct size of vehicle has been used for refuse collection. Cheshire East Council regularly use up to 32tonne vehicles.

Hard Surfacing

- Most of the materials proposed are non-permeable which will increase the surface run off
- None of the roadways are permeable surfacing, all runoff will go to gulleys/rain gardens and then to attenuation pond
- Who will be responsible for the upkeep of the roads and private drives?
 - Are the internal development roads to become public highways or kept under the control of Jones Homes and or its management companies?
 - Are Jones Homes and or its management companies responsible for the upkeep of the private drives or is this split between the proposed housing they serve?

Landscaping Proposal

- Existing field gate into field from existing PROW seems to be left in place, which will lead to a potential risk of Anti Social Behaviour in this area as the area between the gate and adjacent houses is screened by existing trees and vegetation but also proposed hedging along the proposed housing boundary line.
- Bollard placement at the end of Stockton Road, still has enough room around the sized between the bollard and the hedges for vehicles to go round using the verge.
 - In addition to this, who will have access from the emergency services to remove and replace this bollard?
 - Who will ensure the bollard is replaced after an emergency vehicle has gained access?
- How will small vehicular traffic (motorbikes etc) be excluded from the public right of way 43 – currently there are gates/kissing gates/reduced width accesses to reduce this – these proposals remove gates and kissing gates from the area with no replacement
- No legend/key for blue hatching on Stockton Road
- What is the pink hatching on the “Continuation of Public Right of Way” – this is not included in the legend?

Energy-Statement

- Section 1.1 – has included within the red line boundary land which does not belong to Jones Homes but also does not include land which Jones Homes does own.

16049-R05-BNG-Report-October-2025

- Section 3.3 states that Natural England should be consulted for any development where there is a net gain in residential units as it falls within the SSSI Impact Risk zone of Lindow Common SSSI. There has been no correspondence with NE in the BNG report or in documents submitted to the Planning Authority.
- Table 2.1: The Butterfly Bank woods is listed as a “Priority Habitat Deciduous Woodland” and is of “County Ecological Importance” and “Local Ecological Importance”. Many existing hedgerows are of “County Ecological Importance” and “Local Ecological Importance”.
- Section 3.12 – states small sections will be lost as part of the proposals – it doesn’t mention that 2 fields of crops will be lost- it just mentions an area
- Section 3.15 states compensatory planning/habitats will be created – this will mainly be from garden hedging and localised tree planting and will not be in the locations where they have been lost due to the proposed development
- Plan 2: This shows the scale of lost cropland and grassland to urban vegetated gardens; the open space of the development is a very small percentage of the whole main development area

Arboricultural Statement

- Numerous locations of building within Tree Root Protection Areas
- How are these TRPA going to be managed?
- What are the construction methods for working in the TRPAs?
 - Will they be mechanical equipment?
 - Will there be a watching brief from the arboriculturist?
 - What will the final works be made of? Will it be permeable/flexible for tree root growth/tree movement – ground levels should be raised for construction in TRPA not lowered for build up
 - What is the maximum root size allowed to be cut through?
- Hedge H3 is in 3 sections, 2 of which are due to be removed (one section is in a TRPA); this isn’t clear and should be clarified
- What is the reasoning for Tree G7 being removed?
- What is the reasoning for Hedge H13 being removed?
- Hedge H15 should be retained where not crossing driveways or footpaths
- What is the reasoning for Hedge H6 being removed?
- A large section of Hedge H17 is to be removed; only a small section of this needs to be removed for the drainage works – the access path and drainage route can be over the top of each other to reduce hedgerow removal
- Hedge H16 only needs to be removed for the drainage crossing and not the full width as shown

- Can not see any reason why Hedge H19 needs to be removed
- As has been seen on other new residential developments, new hedges are not planted to the same standard as existing hedges that have been removed, and any measure to limit the hedge loss in the first place should be undertaken first – this Arboricultural Statement does not do this and seems to be driven by the developer and not nature.

Outline Drainage Strategy

- Maintenance requirements on swale into attenuation pond due to the use of timber wall?
- No vehicle access to attenuation pond for maintenance
- Where does Exceedance Flow go to from Rain gardens?
- No mention of road gullies and they direction of outfall
- Have calculations been done on 14.4L/s flow from hydro brake into Brook – this is a main river and needs calculations to prove it can take the extra flow, what monitoring will be done to ensure the water level is not too high/at capacity in the stream before the hydro brake operates and releases more water into the stream?
- What scour protection is to be added at the outfall into the brook to prevent erosion of the stream bank under the headwall, riverbed and opposite bank
- Attenuation tank depth not mentioned – tanks are generally not able to have trees etc planted on top of them and also not having vehicles driving over them – this tank location has both (trees and driveway).
- Welton drive foul sewer discharge rate to be confirmed with United Utilities prior to construction of drainage commences
- Stockton Farm access road- road to be drained by highway drainage – is this referring to new or existing drainage? There isn't any positive existing drainage.
- No mention of existing drainage ditches near to the proposed pumping station

Statement of Community Involvement

- The letter drop for the consultation did not consult all affected properties for this development.
- In Appendix EP1 and EP2 the local facilities maps are missing and have misplaced many facilities:
 - Kenmore Medical Centre Pharmacy in incorrect position
 - Other pharmacies (i.e. at Lindow Parade have been missed)
 - No playground mentioned at new Fulshaw Park development by Story Homes
 - Maps don't show going towards Lindow Cricket Club and therefore not showing other local facilities:
 - Convenience Store
 - Vets
 - Church
 - Church Hall
 - Lindow Cricket Club
 - Lindow Primary School
 - Lindow Football Club

- No mention of public houses
- Facilities in town centre are cherry picked
- Section 4 gives no actual answers but points to other documents without references

Transport Assessment

- How will small vehicular traffic (motorbikes etc) be excluded from the public right of way 43 – currently there are gates/kissing gates/reduced width accesses to reduce this – these proposals remove gates and kissing gates from the area with no replacement
- Section 2.4.1 doesn't state all local planning applications for residential use in the area – these were submitted before this Jones application so should be added to the assessment
- Section 3.1.2 – this gate although not served by a dropped kerb does allow vehicle access into the current community field for grass cutting, hedge cutting and other maintenance works
- Section 5.6.4 – workers constructed housing – I agree vehicle movements won't be at the same level as post completion, but no mention of parking for the workers during construction – on completion residential vehicles will be parked on drives in most cases.
- Section 5.6.6 – the CTMP should be included with the planning application
- Section 7.6.10 – states no works to existing junctions as less than 100 vehicle movements an hour at peak times – say 50 outbound vehicles – that means roughly 1 a minute leaving, it can take over a minute during peak times for a vehicle to exit currently with the current housing in the area – this will lead to queues up Welton Drive and lead to my point as in my point below.
- No mention of arriving and departing traffic alternating on which exit/entrances from Knutsford Road to use between Welton Drive and Stockton Road depending on queuing traffic waiting to leave the junctions; and therefore, using Chesham Road as a fast link between the two.
- Section 7.1.1 - Detailed junction operational capacity assessments have been undertaken at some junctions but not at the Stockton Road/Knutsford Road junction which as my point above will take extra traffic
- Section 8.2 – in my professional opinion, due diligence and required estimating has not been undertaken correctly or to the same standard as this development has in this report.
- TA8A, TA8b, TA9 – what is the scale on the vertical axis? Is it metres, vehicles – unclear and therefore data is not useable
- TA12b:
 - Child nursery missing at High School
 - Many facility numbers misplaced
 - TA13 – no cycle routes marked on plan so isomap is not useable
- No mention of cycle infrastructure in the area
- Limited mention of train infrastructure in the area

Boundary Treatments

- Has approval been gained from neighbouring dwellings outside of the proposed development to replace the boundary treatment? Most have either hedgerows or post and rail fencing; replacing these with a 1.8m timber fence needs approval from both parties; also, if the 1.8m fence is not to place on the boundary line, who is responsible for the land between the red line boundary and the proposed 1.8m fencing?

APT Cycle Store

- Title of drawing incorrect
- Various references across drawing to “Match Apartment Block”
- Not site specific

1464-C-DT-5.03(-) SF1-SF15 Details

- SF1 Brick Wall and Timber Screen:
 - Thickness of wall (1 brick thick) is not suitable for wind loading
 - Drawing section states coping is PCC or cast stone; detail note states Pre Cast Concrete – in consistency of description of materials to be used
- SF15 -Estate Railing Detail
 - Inconsistency of naming across drawings – Boundary Treatments drawing states “Cheshire Railing”
 - There is a distinctive difference between Cheshire and estate railings
 - Estate Railings are one colour generally white or black
 - Cheshire railings are white and black in a specific pattern
 - What depth are the posts to be concreted in? This should be included as if not done to design or building regulations can be a Health and Safety issue

Details of SF12 Timber Knee Rail, SF13 Brick Wall and SF16 Railing

- SF12:
 - No detail on what treatment will be used on the timber?
 - No detail on the life expectancy of the preserved timber products?

1464-C-DT-5_01(-) SF10-SF11 Detail

- SF10:
 - States timber treatment as note but no notes on drawings
- SF11:
 - States timber treatment as note but no notes on drawings

Various Drawings for Housing Types

- All the submitted plans, have colour images and elevations for each house type but then points you to another plan for all the elements shown

- Therefore, all the submitted plans for the housing types mentioned below are obsolete and not site specific
 - STOCK-THORN
 - STOCK-POP
 - STOCK-MERE
 - STOCK-LUD
 - STOCK-KEN
 - STOCK-HAW
 - STOCK-ELM-LARCH
 - STOCK-DUR
 - STOCK-DEL
 - STOCK-CAM
 - STOCK-BAMB
 - STOCK-ALD

SHD2341-SHD-HLG-STOC-DR-EO-Lighting Layout

- No street lighting is proposed for the 3 dwellings off Stockton Road

CEMP

- Several items on the key are not included on the plan
- No wheel wash facility marked on plan which given the ground conditions of this area is a necessity – I have never seen a Jones Homes site (or any other housing development) install a wheel wash facility on site
- No mention of how surface water will be contained, treated and disposed of
- The site compound, storage facilities and car parking are at the furthest extent of the site away from the entrance point meaning all vehicles leaving site will need to be washed down not just deliveries; they are also up against the red line boundary for the scheme, adjacent existing dwellings on Chesham Road. This area is also prone to localised flooding
- No indication of the pink box adjacent the site compound area
- No indication of what the two separated areas are: adjacent site compound and to the rear of Build Phase 5
- Arros on plan only show vehicular traffic accessing site and not leaving site
- No mention of how construction traffic accesses houses to be built off Stockton Road
- No detail on how vehicles access site from public roads to development
- No detail on Tree Root Protection zones
- No detail on protection of retained trees and hedgerows
- No mention of where material will be stockpiled (i.e. topsoil stripped from site)
- Where will vehicles park for sales area?
- No mention of holding areas for deliveries – Chesham Road, Welton Drive are not large enough to hold HGVs or other large vehicles
- No mention of timings of site access hours or restricted operating hours
- No mention of how the public will be protected accessing and exiting the public open space adjacent the development entrance

- No mention of once houses in early build phases are occupied, how will the roads be kept clean as it is presumed later build phases will still be ongoing at this point

Location Plan

- No indication of what the two separated areas are: behind 5-11 Chesham Road and 2 Welton Close / 4 Chesham Close
- Indicates the red line boundary adjoins Welton Drive which has been proven the red line boundary doesn't

Noise Impact Assessment

- Assessment carried out in December 2024 – details of development have changed, and surrounding area has changed (more houses built etc); in theory this needs to be reassessed as using data which will be over 12 months old on determination of application
- Section 2.1: No mention of Welton Close/Chesham Close or Chesham Road
- Section 2.3: Mentions approximately 100 houses – been dropped to 85 in the application (this number is not even with 10% of approximate number); also states “likely to be dominant environmental noise source” – this can be confirmed as this would be dominate noise source
- Section 4 does not indicate where noise readings were taken
- Undertaking the readings only once has a detrimental impact to the assessment as noise absorption is at its lowest from the natural environment in the winter months; another assessment should have been carried out in the summer months
- Figure 5.3: Shaded colour doesn't match the adjacent key therefore actual noise risk is undefined
- Section 6.2 states an Acoustic Design Statement (ADS) is needed once a layout is available – this is available, and the ADS hasn't been provided
- No mention of noise impact during construction either in the NIA or the CEMP – no suggestions on how to reduce or remove noise during construction

LEAP

- No detail of fencing arrangement around the play area
- No mention of how to prevent wayward toys/balls leaving play area and landing in the adjacent existing sub station accessed from Chesham Road

Hedgerow Assessment Report

- Document Prepared, Checked and Approved by unknown persons with unknown qualifications
- Document checked and approved by the same person

- Executive Summary: With the Point 2 mentioning 11 of the 18 hedgerows on site being important and 6 of these being important; how can it then be deemed in point 3 that any removals of important hedgerows will be minor?
- Section 1.2.1 states the land between Whitehall Brook and the A34 to be “rough grassland, scrub and woodland”, this in fact is a protected area with protected species living in the area
- Section 1.3.1 is making assumptions about what is being retained and what is being proposed by Jones Homes which makes it seem as if RSK have not reviewed other documentation of discussed the proposals with their client, Jones Homes
- Table 1 states over 190m of hedgerow is to be removed where most of the hedgerows on site are classed as important

Spine Road X section 1 of 3

- Bar Chainage 0.000 (where it joins the existing highway network); the whole spine road on this plan is being raised a considerable height
- The land is currently very wet anyway, so lifting the spine road and therefore adjacent development land, will increase the amount of water going into the rain gardens or running off to outside of the red line boundary

Spine Road X section 2 of 3

- Most of the level on this plan are still being raised for the spine road
- Comment above regarding the surface water is a valid point for this plan as well

Spine Road X section 3 of 3

- Most of the level on this plan are still being raised for the spine road
- Comment above regarding the surface water is a valid point for this plan as well

Flood Risk Assessment / Engineering Appraisal

- Section 2.2.2: states multiple minor watercourses are shown in Figure 4 – only the main river of Whitehall Brook is shown
- Most of the comments to the FRA have been mentioned by the Environmental Agency
- Figure 6 shows surface water flooding on the main development site and the Country Park area in a 1:30 flood risk
- Section 4.1 mentions proposed apartments which aren't in the development.
- Table 6-1 shows the permeable area goes from 0.00ha to 2.82ha and the permeable area therefore decreasing by 2.82ha; with no suggestion if the attenuation system can cope with this volume
- Section 6.2 also states that gardens and landscaping are not included in the change to impermeable area as it is considered to drain to the ground – however, increasingly hard

landscaping areas (terraces/patios/drives etc) now have positive drainage included and connected into the surface water drainage system

- Section 6.4.12 states a controlled discharge rate of 14.4L/s – how has this been worked out and how are the flows to be controlled – this has not been mentioned. Whitehall Brook floods in high rainfall and adding more water to the river at his time will exasperate the flooding to the local roads and dwellings on Ashford Road and Fulshaw Park South and flooding to Alderley Road, and flooding to the golf course and the other side of Brook Lane
- With the information supplied by Jones Homes via the Report provider, it can be considered, there is a significant lack of information contained in the report.
- Appendix E: Borehole 1 (BH1) – Page 1 and 2 of report - is for a different location which is 885miles from the closest part of the proposed site

Design and access statement

- Diagram 6.1 is missing many hedgerows and mature trees
- Surrounding Character: This shows dwellings from the local area. Due to this development being in the FPDG area, only house types 1 and 2 are suitable to be compared with
- Site and Context is pulling dwelling design from across the local area and not related to the FPDG
- Diagram 13.1 shows maintaining and enhancing the field/footpath access – this is already at adjacent footpath level so any change would be in benefit to access the development; also, this diagram shows the red line boundary coming through the entrance to the field (open space area) – this access is owned and maintained by Cheshire East Highways/Council
- The Design Parameters show multiple images of housing and roads/footways but contributes very little to the purpose development as not all these will be used in this proposed development
- Detailed Design: The design of all the dwellings are very generic Jones Homes designs and not altered to suit into the FPDG

Several documents state there are apartments as part of the development, but having reviewed the submitted plans and documents, this is not the case. Mentioning this in documents suggests consultants and designers have not worked together on this application. It may also suggest many parts of the reports are copy and pasted from other reports done for Jones Homes on other developments – this can bring into repute the reports as a whole.

I have produced this report for the Protect Butterfly Bank Committee in aiding them and the local population in objecting to this proposed development by Jones Homes. I have used my Civil Engineering knowledge and experience to put this together and not have allowed personal opinions to be added to this – as a local resident I have submitted a separate objection.

Regards

A handwritten signature in black ink, appearing to read 'Gavin Dawber', with a long, sweeping flourish extending to the right.

Gavin Dawber

EngTech MICE BEng

PROTECT BUTTERFLY BANK

Planning Application 25/3735/FUL



Elite Ecology EIA Technical Report Review



Elite Ecology

Passionate about Ecology

**Stockton Farm,
Wilmslow**

**Technical Report Review
December 2025**



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1. Introduction

1.1 Report Rationale

This report has been prepared at the request of Mr. Paul Wakefield (Planning Officer) on behalf of Protect Butterfly Bank. It relates to the proposed development works at Stockton Farm, Wilmslow, Cheshire, SK9 6HH (Central Grid Reference: SJ 83994 79559).

1.2 Works

The site in question measures at 9.34ha, with 2.65ha proposed to be developed into residential housing.

The baseline habitats of the site contains; woodland, mature trees, hedgerows with associated ditches, mixed scrub, arable land, modified grassland, and other neutral grassland.

An Ecological Impact Assessment has been undertaken by Taylor Grange for the site dated October 2025 (TG Report No. 16049_R01_SC). This EIA covers the baseline of the site, potential for protected species on site, phase 2 surveys undertaken Taylor Grange, impacts and a Biodiversity Net Gain assessment.

With the exception of an updated Biodiversity Net Gain Assessment, No standalone documents have been submitted to the Local Planning Authority.

The document aims to review the works undertaken.

2. Survey works

2.1 Limitations and Assumptions

Please note, that page numbers of the section and paragraph could not be provided as the page numbers provided within the EIA are inconsistent with page 1 repeating multiple times.

2.1.1 Great crested newt

Within paragraph 1.10 of the EIA only ponds within a 250m radius of the site have been considered. Under the Great crested newt mitigation guidelines (Natural England 2001) and the Guidelines for Preliminary Ecological Appraisal (CIEEM 2017), the standard scoping size for ponds is a radius of 500m.

2.1.2 Whitehall Brook

Paragraph 1.13 states that an outfall for drainage is proposed and will be discharged into Whitehall Brook. This paragraph also states that a River Condition Assessment of the brook and riparian mammal surveys are still required to be undertaken. Based on this, the full impacts of the proposals have not been assessed.

2.1.3 Designated sites

Table 2.1 lists two Ramsar sites within 10km of the site. No assessment has been made of the impacts that the site will have on the Ramsar sites through additional pressures such as additional visitors to the area. A Habitats Regulations Assessment (HRA) must be undertaken in accordance with The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 to fully assess the impacts that may occur within the Ramsar Sites.

2.2 Habitats

2.2.1 In Table 2.2, a number of habitats have been described with a general overview and a list of species. Column three states the ecological importance of the habitats. Within this ecological importance column, several habitats, including other neutral grassland with scattered scrub, tall forbs, and woodland have only been assessed on their botanical species, and have been classified as being of negligible ecological importance. No assessment has been made on how fauna may potentially use the habitats for means of foraging and refugia. This is only assessed in the mixed scrub and willow scrub habitats.

2.3 Species

2.3.1 Table 1 below details the following species have been assessed within the EIA and what survey methods have been used:

Species / Species Group	Methodology Used
Amphibians	No surveys undertaken as no access was granted for ponds within 250m.
Badgers	Information redacted.
Bats	Ongoing assessment through night-time bat walkovers. Ground level Assessment of trees with subsequent aerial inspections.
Birds	Four breeding bird surveys undertaken during April to June 2025
Reptiles	No surveys undertaken due to the development offering limited habitat.
Riparian Mammals (otters and water voles)	No assessment undertaken.
Hedgehogs	Scoped out as likely to be in adjacent habitats.
Invasive species	Invasive nonnative species identified on site during walkover.

No assessment of the following taxonomic groups has been undertaken:

- Fish
- Crustaceans
- Invertebrates

2.3.2 Amphibians

Paragraph 2.8 of the EIA states that great crested newts have been found within 250m of the site. In addition to this, a total of six European Protected Species (EPS) licences for great crested newts have been granted 600m to the south of the site. The site also falls within an amber District Level Licensing Zone.

A review of the data Provided by Multi- Agency Geographic Information for the Countryside (MAGIC) reveal there are a total of six European Protected Species (EPS) licences for great crested newts. However these licences are approximately 400m to the south east of the site, Not the 600m as reported within the EIA.

This again brings up the question of why ponds within a 500m radius of the site were not assessed?

Within a 500m radius of the site there are twelve ponds. The ponds to the east of Melrose way and Adderley road can be discounted from assessment due to major barriers. The EIA states that whitehall brook also forms a barrier for dispersal however, no reasoning has been stated as to why this is the case and no information has been provided on the morphology of the brook to back up this statement. A number of foot bridges are also present along the brook, with two of these directly accessing the site. These bridges can be taken advantage of by amphibians, including great crested newts, to access the site. Based on this there are a total of 7 ponds that require assessment within 500m of the site.

No additional survey work has been undertaken, this is explained in paragraph 1.10, due to a lack of access provided and presence is assumed. However, no evidence of refusal has been provided.

2.3.3 Bats

At the time of this review, the bat activity surveys are incomplete. Therefore, the impacts on bats cannot be assessed in full. It should be noted that under the Surveys for Professional Ecologists: Good Practice Guidelines 4th edition (2023), these surveys are no longer referred to as bat activity surveys and are now referred to as bat night-time walkover surveys.

Several trees have been on site have been identified to have potential to support roosting bats. Follow up aerial surveys have been undertaken. T1 was originally recorded as PRF-I, and then updated to FAR requiring further assessment. No further assessment of T1 looks to have been undertaken.

An aerial tree survey was undertaken of T2, which is ivy clad. Due to the ivy on the tree also being a potential roosting feature, there is the potential that a bat could have been harmed during the inspection.

All other trees have been sufficiently assessed following the guidance set out in the Good Practice Guidelines 4th edition.

2.3.4 Birds

Only four bird surveys have been conducted between April and June 2025. No methodology, timings, or weather conditions have been provided has been provided for these surveys. The bird survey guidelines (2025) recommend that there is a minimum of six visit for breeding bird surveys. Any deviation in the number of surveys must be supported with detailed and robust justification. No justification for undertaking only four visits has been provided within the EIA.

No surveys for barn owl (*Tyto Alba*) have been undertaken, despite the ecological data records noting that the species potentially has a roost on site as stated in Paragraph 2.27. Under the Barn Owl Survey Methodology and Techniques for use in Ecological Assessment (2012) methodology, following the confirmation of barn owl on site provided by the ecological data the following stages should be implemented:

- *Stage 1: On-site Scoping Survey to identify and record those features of the landscape which are broadly suited to barn owls.*
- *Stage 2: Investigative Field Survey to determine which of the features identified in the Stage 1 survey offer potential nest sites, roost sites and habitats for foraging and movement.*
- *Stage 3: Nest site Verification Survey to confirm which of the potential nest sites identified in the Stage 2 survey are actively used by barn owls for breeding.*

In addition to the above, No consideration for the potential for wintering bird amalgamations has been mentioned in the EIA, nor have they been scoped out.

2.3.5 Reptiles

No assessment of reptiles has been undertaken due to limited habitats on site that has been intensely managed. The EIA acknowledges that the hedgerows and scrub on site may be used as refugia but has not taken into account the woodland edge. The EIA also states that “*there is some potential for transient reptile species on site or very localised populations utilising the hedgerows and scrub habitat*” in paragraph 2.36.

2.3.6 Riparian Mammals

An outfall for drainage is proposed and will be discharged into Whitehall Brook. Survey works are still required before impacts on riparian mammals can be addressed. These surveys have been recommended within the EIA with an addendum report to follow. At the time of this review no such report has been uploaded to the planning portal.

2.3.7 Hedgehogs

The EIA in paragraph 2.42 states that populations of hedgehog that utilise the site will be using the habitats in the area and are not reliant on the site alone. Therefore, any population of hedgehogs on site will be of negligible ecological importance. Hedgehogs have seen a drastic decline in their population within the UK and are considered vulnerable to extinction on the UK red list for mammals.

2.3.8 Welfare

While not legally protected, no welfare considerations have been put forward for species such as deer and foxes that currently use the site have been put forward. For example under the Animal Welfare Act 2006 it is illegal to block the dens of foxes within the breeding season of December to May.

3. Proposed Development

3.1 Design Evolution

- 3.1.1 Paragraph 2.45 discusses measures to avoid and retain important ecological features. This includes avoidance of woodland and scattered tree removal, where possible, suitable buffer zones between the proposed development and priority woodland, the retention of hedgerows and other boundary features, and enhancements to the habitats. While these are welcome, no maps have been provided to show any form of buffer or avoidance zones, nor is there any mention on the size the buffer to the would land should be. The submitted landscape plans show a 10m buffer of wildflower between the development and the north-west boundary of the central woodland however buffer zones for individual tree and hedgerows do not appear to have considered the root protection area of either twelve times the trees diameter at breast height (DBH) or the 5m from the canopy edge in accordance with British Standard BS 5837:2012. There is no mention of any possible veteran trees, which will need a buffer of 15m minimum or 15 times the DBH as recommended by UK government guidance.

The eastern section of the development will be enhanced with the inclusion of wildflower meadow and wetland meadow, native shrubs and trees. Ecologically important habitats in this area are sufficiently protected.

3.2 Designated Sites

Paragraph 2.46 states that there will be no impact to the Ramsar Sites due to the provision of recreational areas on site, with no full Habitat Regulation Assessment undertaken. A Habitats Regulations Assessment (HRA) must be undertaken in accordance with The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 to fully assess the impacts that may occur within the Ramsar Sites.

3.3 Habitats and Flora

Paragraph 2.50 states that all trees and woodlands are to be retained as part of the proposal. However, this is not the case, with a small section of woodland shown to be lost within the development area when comparing the baseline habitat map to the new habitat map.

3.4 **Protected and Notable Species**

3.4.1 Table 2 below details the following mitigation has been put forward within the EIA:

Species / Species group	Mitigation
Amphibians	The Development will join the Natural England District Level Licencing (DLL) scheme
Badgers	Precautionary measures have been recommended to be detailed within a CEMP. Measures are to include a pre-commencement walkover to ensure no setts are on site, a tool box talk, materials to be stored off the ground, capping off all pipework >200mm left overnight. Sealing trenches/excavations or providing a ladder/ramp to allow for escape.
Bats	Trees with PRFs are to be retained. Avoidance measure detailed within a CEMP for the avoidance of dust and lighting during the construction. Ecological enhancements through the provision of bat boxes. This mitigation is incomplete due to ongoing night-time bat walkover surveys.
Birds	Precautionary measures to avoid clearance of suitable habitats on site during the breeding bird season. Ecological enhancements through habitat creation and the provision of bird boxes.
Reptiles	Precautionary measure through Reasonable Avoidance Measures (RAMs) to avoid suitable habitat during the winter to avoid disturbance of hibernating individuals and a phased cut of vegetation to allow for reptiles to disperse.
Hedgehogs	To follow the same mitigation as badgers.
Riparian Mammals (otters and water voles)	No Mitigation put forward due to the need for survey works
Invasive species	Avoidance measures and treatment of Non-native invasive species.

3.4.2 Amphibians

The Application to the DLL is an acceptable form of mitigation. However, due to the reasons stated in section 2, due to the lack of survey effort the true impact on local great crested newt populations is unknown.

3.4.3 Badgers

The precautionary measures for badgers is acceptable but does not cover the process for a scenario where a badger sett is identified during the pre-commencement walkover and the possible need to close a sett.

3.4.3 Bats

This mitigation is incomplete due to ongoing night-time bat walkover surveys. Additionally post development impacts such as artificial lighting have not been considered. A lighting plan is required and must be in accordance with the provisions set out by the Institute of Lighting Professionals and Bat Conservation Trust: Guidance Note 08/23: Bats and Artificial Lighting in the UK.

3.4.4 Birds

Only precautionary measures have been recommended. No discussion on impacts to the five priority species that may possibly be breeding on site and if mitigation is required has been put forward within the EIA. In addition to this as only four surveys have been completed rather than the six outlined in the bird survey guidance. Therefore, the data collected is incomplete and adequate mitigation cannot be put forward.

3.4.5 Reptiles

A RAMS has been recommended within the EIA. Based on the scale of the development and the enhancements to be made this strategy is acceptable however detail is required showing the timings of works, suitable environmental factors and the vegetation clearance directions are to be mapped to show the direction in which reptiles are being dispersed.

3.4.6 Riparian mammals

Further survey work is required to assess impacts and possible mitigation.

3.4.7 Invasive species

The avoidance measures and treatment for Himalayan balsam (*Impatiens glandulifera*) are acceptable. However, there is no mention of the removal of *Yellow Archangel* (*Lamium galeobdolon*) also identified on site as mentioned in paragraph 2.75. There also appears to be a copy paste error in this section with the river ouzel mentioned.

4. Biodiversity Net Gain

4.1 General Comments

A Biodiversity Net Gain assessment has been provided in section 4 of the EIA using the Statutory Metric. However, no assessment of the condition of the baseline habitats has been provided, nor is there any reference to a separate condition assessment to refer to.

The EIA states that rationale has been detailed within the metric itself, however this metric does not appear to be on the Planning Portal. In addition to this, the EIA does not give a breakdown of the baseline units value and how many units are to be lost.

An updated Biodiversity Net Gain Report has been uploaded to the Planning Portal. While some habitats have been re-parcelled, the areas of habitats add up and the condition assessment has been provided. However, the River Condition Assessment is still outstanding.

Within the EIA, 0.07ha of developed land; sealed surface (designated as buildings) can be found within table 4.3. This is omitted from the updated assessment.

The plans within both documents show multiple buildings to be built on the site that will exceed the total 0.07ha area. In addition to this, the new habitat map in both documents show the buildings, driveways, road and pathways mapped as vegetated garden, and front gardens of properties mapped as modified grassland rather than vegetated gardens.

There is not mention of strategic significance of habitats in either document.

Due to this, it is likely that the total areas input into the calculation are incorrect.

5. Conclusion

5.1 Summary

The Environmental Impact Assessment (EIA) demonstrates several significant limitations in scope, methodology, and ecological evaluation. For amphibians, only ponds within 250m of the site were considered, despite guidance recommending a 500m radius. This is particularly concerning given the presence of great crested newts within 250m, multiple EPS licences granted nearby, and the site's location within an amber District Level Licensing Zone. No further surveys were undertaken, with presence merely assumed due to access constraints.

Similarly, bat activity surveys remain incomplete, leaving impacts uncertain. Trees with potential roost features (notably T1 and T2) were inadequately followed up, with inspection of ivy-clad features carrying a risk of harm, although other trees were sufficiently assessed.

Bird surveys were limited to four visits, below the recommended minimum of six, with no methodology provided. Barn owl surveys were absent despite records of potential roosts, and wintering birds were neither considered nor scoped out.

Riparian mammal surveys are still required to assess the proposed drainage outfall into Whitehall Brook, while hedgehogs were deemed of negligible importance despite their vulnerable conservation status and national population decline.

Habitat assessments also undervalue ecological importance by focusing primarily on botanical species. Other neutral grassland, tall forbs, and woodland were classified as negligible without considering their potential use by fauna for foraging or shelter, with faunal use only assessed in scrub habitats.

Mitigation measures, such as woodland avoidance, hedgerow retention, and buffer zones, are welcome but lack detail. No maps have been provided to illustrate buffer or avoidance zones, nor is there clarity on buffer dimensions. The submitted landscape plans show a 10m buffer of wildflower between the development and the north-west boundary of the central woodland however buffer zones for individual tree and hedgerows do not appear to have considered the root protection area of either twelve times the trees diameter at breast height (DBH) or the 5m from the canopy edge in accordance with British Standard BS 5837:2012. There is no mention of any possible veteran trees, which will need a buffer of 15m minimum or 15 times the DBH as recommended by UK government guidance.

Designated sites are similarly under-assessed: while two Ramsar Sites are present within 10km are identified, no Habitats Regulations Assessment has been undertaken to evaluate potential indirect impacts such as visitor pressure or pollution from the outfall.

Furthermore, although paragraph 2.50 claims all trees and woodlands will be retained, comparison of baseline and proposed habitat maps indicates a small section of woodland loss.

The Biodiversity Net Gain (BNG) assessment presented in Section 4 of the EIA is incomplete and raises concerns about accuracy and transparency. No baseline habitat condition assessment was provided, nor was a separate condition report referenced, leaving the validity of the metric unsubstantiated. Although the EIA claims that rationale is detailed within the metric, the metric itself is not available on the planning portal, and no breakdown of baseline unit values or losses is given.

An updated BNG report has since been uploaded, with habitats re-parcelled and condition assessments included, but the River Condition Assessment remains outstanding and the Statutory Metric is still unavailable.

Furthermore, inconsistencies exist between reported and mapped areas: 0.07ha of developed land (sealed surface/buildings) listed in Table 4.3 is omitted from the updated metric, while site plans show multiple buildings exceeding this area.

Habitat maps also misclassify built features such as buildings, driveways, and paths as vegetated gardens, and front gardens as modified grassland. These discrepancies strongly suggest that the input areas used in the calculation are incorrect, undermining confidence in the reported net gain outcomes.

Overall, the EIA contains gaps in survey effort, methodological rigour, and ecological evaluation. Without completion of outstanding surveys and provision of clear mitigation mapping, the full impacts of the development cannot be adequately assessed or mitigated.

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The latest good practice guidelines put in place by Natural England or the relevant statutory conservation bodies have been followed by the surveyors on site. If those methodologies fail to identify a protected species during the survey efforts, no responsibility can be attributed to Elite Ecology. If any of these guidelines are adapted between the date(s) of the surveys being undertaken and the submission of this report, then Elite Ecology takes no responsibility for this.

Should any equipment be damaged or lost on site at the fault of the client(s), then Elite Ecology withholds the right to charge 100% above the current market value for that exact product or the nearest similar product.

The survey results purport the current status of the site and its potential for protected species utilisation at the time of surveying. It should not be viewed as a complete list of the possible flora and fauna species that could be using the site at different times of the year.

Elite Ecology has been provided with full payment for this report and thus the product has been released to the client(s) for the purpose of their planning application. If any part of the report is lost or altered without the written permission of Elite Ecology, then the entire report becomes invalid. Due to the potential for continual change within the natural world, this report is valid for **2 years only** from the date of the last survey visit. If this report is submitted after the 2 year deadline, then a further updated inspection will be required to ascertain whether the site remains in the same condition as it was when initially inspected.

No reliance should be made on any such comments in relation to the structural integrity of the features located on the surveyed site. All information within the report is based solely on evidence that has been found on site during the service provided. No individual opinion or inference will be made other than that of the suitably qualified ecologist appointed to the project.

PROTECT BUTTERFLY BANK

Planning Application 25/3735/FUL



Elite Ecology LVA Technical Report Review



Elite Ecology

Passionate about Ecology

**Stockton Farm,
Wilmslow**

**Technical Report Review
December 2025**



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1. Introduction

1.1 Report Rationale

This report has been prepared at the request of Project Butterfly Bank for the attention of Mr. Paul Wakefield (Planning Officer). It relates to the proposed development works at Stockton Farm, Wilmslow, Cheshire, SK9 6HH (Central Grid Reference: SJ 83994 79559).

1.2 Works

The site in question measures at 9.34ha, with 2.65ha proposed to be developed into residential housing.

A Landscape and Visual Appraisal has been undertaken by Taylor Grange for the site dated September 2025 (TG Report No. 16049_R03_CD_OK).

The document aims to review the works undertaken.

2. Review

2.1 Scope and Methodology

- 2.1.1 The report correctly sites Guidelines for Landscape and Visual Impact Assessment (GLVIA), Third Edition, LI and IEMA, 2013; An Approach to Landscape Character Assessment, Natural England, 2018; and the Landscape Institute's TGN 02/21 and LITGN-2024-01 showing there is a clear awareness of the current best practises. In addition to this the report states that this is "*is a standalone report and does not comprise a landscape chapter in the context of an Environmental Statement (ES) required by an Environmental Impact Assessment (EIA)*" which aligns with the GLVIA3 proportionality principle.
- 2.1.2 The report does not clearly set out how value, susceptibility and sensitivity were derived for each receptor (landscape units and visual receptors). The appraisal could benefit from explicit definitions of sensitivity, magnitude, and significance criteria. GLVIA3 requires transparent reasoning for these judgements rather than implicit professional assertion. The report should reference LITGN-2024-01 clarifications where interpretation is needed and show how professional judgement was applied.

2.2 Planning context

- 2.2.1 The LVA makes reference to National Planning Policy Framework (2024), Cheshire East Local Plan Strategy, Site Allocations, Neighbourhood Plan, and relevant SPDs. The relevant policies have been correctly identified.
- 2.2.2 The policy review is descriptive but lacks critical linkage: how do the proposals align or conflict with each policy? Best practice is to provide a policy compliance matrix. The Green Belt context is mentioned but not fully analysed against the five purposes of Green Belt (NPPF §138). The LVA should explicitly apply the NPPF decision tests (e.g., conserving landscape character, weighing harm against benefits) and demonstrate how proposals meet Policy SE4 requirements (conserve/enhance character, integrate planting, protect hedgerows/trees) rather than only listing policies.

2.3 Baseline and Landscape Value

- 2.3.1 The LVA uses national and local character assessments and cites Cheshire East LCT/LCA appropriately and identifies the site at a national level of NCA 61: Shropshire, Cheshire and Staffordshire Plain. The LVA correctly identifies the county character of LCT 7: Lower Wooded Farmland and within LCA 7c: 'Chonar' and site specific levels with reference to Cheshire East Landscape Character Assessment (2018), ensuring alignment with local evidence base. Topography, hydrology, vegetation, and heritage are described in detail within this section of the LVA.
- 2.3.2 The baseline assessment is descriptive but not evaluative. UK best practice requires explicit identification of landscape value (using LI TGN 02/21 criteria: scenic quality, rarity, representativeness, conservation interests, etc.). Where the report scopes out Conservation Areas and Listed Buildings from further assessment, it must show clear visibility analysis and reasoning against the TGN factors.

2.4 Visual Baseline, Viewpoints and Visualisations

- 2.4.1 Viewpoints agreed with the LPA, demonstrating compliance with consultation requirements and Zone of Theoretical Visibility (ZTV) mapping and PRow analysis are included, which is standard practice. Photomontages and the ZTV map are included within the appendices of the report.

2.5 Assessment of Effects and Significance

- 2.5.1 The report uses standard significance labels but does not show the matrix or stepwise combination of sensitivity and magnitude used to reach each conclusion. GLVIA3 requires that significance judgements be traceable and explained; LITGN emphasises narrative justification over opaque matrices. The report should also explicitly separate landscape-resource effects from visual-receptor effects and quantify residual effects after mitigation. UK practice requires explicit judgements of significance of effects, even in non-EIA LVAs. There is limited discussion of mitigation measures beyond landscape strategy; best practice expects embedded mitigation (planting, buffers, design refinements) to be clearly tied to effects.

2.6 Assessment of Cumulative Effects

- 2.6.1 There is no clear cumulative effects section in the provided extract. GLVIA3 requires cumulative assessment with rationale for included projects and spatial/temporal scope; this must be added and cross-referenced to local consented/allocated developments.

3. Conclusion

3.1 Summary

- 3.1.1 Insufficient PRow receptor analysis: The appraisal notes PRow locations but lacks a receptor-by-receptor sensitivity table that explains how users of each path (commuters, recreational walkers) were judged for susceptibility and value; GLVIA3 expects explicit receptor characterisation and justification.
- 3.1.2 Limited treatment of temporary construction effects: Construction-phase effects are only briefly mentioned; there is no clear programme, mitigation for temporary visual intrusion, or monitoring commitments, yet these can be material to planning decisions and should be assessed separately.
- 3.1.3 Value assessment not systematic: The report references local and county LCAs but does not present a structured *landscape value* appraisal using TGN 02-21 factors (representativeness, rarity, perceptual qualities, recreational value, associations). A short table applying those factors to the site and nearby LLDAs would make value judgements transparent.
- 3.1.4 Scoped-out heritage visibility needs evidence: Scoping out Conservation Areas and Listed Buildings from assessment is acceptable only if supported by clear visibility analysis and explanation against TGN criteria; the report's statements are currently insufficiently evidenced.
- 3.1.5 Policy test mapping is weak: The report lists NPPF and Cheshire East policies but does not map each identified significant effect to the relevant policy test (e.g., NPPF paragraphs on conserving landscape and Cheshire East Policy SE4) or state whether harm would be "significant" in planning terms.
- 3.1.6 No explicit cumulative assessment: There is no systematic cumulative effects section listing consented/allocated schemes, their distances, and combined visual/landscape implications; GLVIA3 requires a reasoned cumulative scope and inclusion rationale.

3.2 Conclusion

- 3.2.1 The Landscape and Visual Appraisal (LVA) for Stockton Farm demonstrates awareness of relevant guidance but falls short of current UK standards in several key respects. The appraisal is overly descriptive, lacking transparent evaluative criteria for sensitivity, magnitude, and significance of effects as required by GLVIA3. Landscape value has not been systematically assessed against LI TGN 02/21, and heritage assets are scoped out without robust justification. Policy analysis is presented narratively but fails to critically link proposals to compliance or conflict with specific policies, including Green Belt purposes. Cumulative effects and embedded mitigation are not addressed, leaving the assessment vulnerable to challenge. Presentation is technical-heavy, without a non-technical summary, and plans are not fully integrated into the narrative.

Overall, the LVA requires stronger transparency and evaluative rigour to meet the expectations of UK planning authorities and withstand scrutiny at inquiry or appeal.

4. References

Landscape Institute & IEMA (2013) – Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3)

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Landscape Institute (2019) – Technical Guidance Note 06/19: Visual Representation of Development Proposals

Natural England (2018) – An Approach to Landscape Character Assessment

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National Planning Policy Framework (NPPF, December 2024) – UK Government

Cheshire East Council (2018) – Cheshire East Landscape Character Assessment

Cheshire East Council (2017) – Local Plan Strategy 2010–2030

Cheshire East Council (2022) – Site Allocations and Development Policies Document

Cheshire East Council (2017) – Borough Design Guide SPD

Wilmslow Neighbourhood Plan (2019) – Adopted November 2019

Cheshire East Council (2015) – Green Belt Assessment Update

Cheshire East Council (2013) – Strategic Housing Land Availability Assessment (SHLAA)

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Elite Ecology undertake all site surveys with reasonable skill, care, and diligence, within the terms of the contract that has been agreed with the client and abiding by the Elite Ecology Terms and Conditions. The actions of the surveyors on site, and during the production of the report, were undertaken in accordance with the Code of Professional Conduct for the Chartered Institute of Ecology and Environmental Management.

The latest good practice guidelines put in place by Natural England or the relevant statutory conservation bodies have been followed by the surveyors on site. If those methodologies fail to identify a protected species during the survey efforts, no responsibility can be attributed to Elite Ecology. If any of these guidelines are adapted between the date(s) of the surveys being undertaken and the submission of this report, then Elite Ecology takes no responsibility for this.

Should any equipment be damaged or lost on site at the fault of the client(s), then Elite Ecology withholds the right to charge 100% above the current market value for that exact product or the nearest similar product.

The survey results purport the current status of the site and its potential for protected species utilisation at the time of surveying. It should not be viewed as a complete list of the possible flora and fauna species that could be using the site at different times of the year.

Elite Ecology has been provided with full payment for this report and thus the product has been released to the client(s) for the purpose of their planning application. If any part of the report is lost or altered without the written permission of Elite Ecology, then the entire report becomes invalid. Due to the potential for continual change within the natural world, this report is valid for **2 years only** from the date of the last survey visit. If this report is submitted after the 2 year deadline, then a further updated inspection will be required to ascertain whether the site remains in the same condition as it was when initially inspected.

No reliance should be made on any such comments in relation to the structural integrity of the features located on the surveyed site. All information within the report is based solely on evidence that has been found on site during the service provided. No individual opinion or inference will be made other than that of the suitably qualified ecologist appointed to the project.

PROTECT BUTTERFLY BANK

Planning Application 25/3735/FUL



End