



Acres Brook, Sabden Road  
Higham, Lancashire, BB12 9BL

Telephone: 07718070750  
jackie.copley@cprelancashire.org.uk  
www.cprelancashire.org.uk

Stockport MBC,  
Planning Services,  
Stopford House,  
Piccadilly,  
Stockport  
SK1 3XE

Patron  
Her Majesty the Queen  
President  
Emma Bridgewater  
Chair  
Debra McConnell

By Email: [planning@stockport.gov.uk](mailto:planning@stockport.gov.uk); [DC@stockport.gov.uk](mailto:DC@stockport.gov.uk)

6 March 2020

Dear Rebecca Andison,

I am writing to you on behalf of CPRE Lancashire to object to the application DC/074399 for land bounded by Ashton Road, the River Tame, Turner Lane and Bredbury Industrial Estate.

## **About Us**

CPRE is the countryside charity that works with communities, businesses and Government to ensure that our countryside and green spaces can thrive in the future. CPRE Lancashire, Liverpool City-Region and Greater Manchester (hereafter CPRE) is not anti-development per se, but it does want to see countryside and greenspace better protected as development decisions are taken. In this case, we have been contacted by a number of members and local residents who have raised concerns regarding the Bredbury application as described above.

The NPPF states that decisions must be taken in accordance with the development plan, unless material considerations dictate otherwise. In this instance the Local Development Plan comprises the Stockport Local Plan Core Strategy adopted in 2011, saved policies from the Stockport Unitary Development Plan (UDP) and both the Waste and Minerals Plans adopted jointly by Greater Manchester.

We make our comments in the context of the National Planning Policy Framework (NPPF) and the development plan documents.

## **The Proposal**

There are two parts to the application to develop the 30.90 hectare site. Part A is for outline planning permission for the creation of a commercial/industrial development providing up to 76,272 sqm of B2/B8 employment floorspace (including ancillary office accommodation) with an allowance for up to 929 sqm of associated retail/leisure floorspace falling within use classes A1, A2, A3, D1 and/or D2, along with the provision of other associated infrastructure (including internal plot access, roads, parking, footpaths, internal landscaping and the provision of a car park to serve Stockport Sports Village). Part B is for full planning permission for the creation of two commercial/industrial unit comprising 39,857 sqm (including ancillary office accommodation), the widening and realignment of Bredbury Parkway and the relocation of its junction with Ashton Road, along with the provision of other associated infrastructure (including access, parking and internal landscaping).

## **Climate Change**

Is the proposed use of land, which will be accessed in the main by motor vehicles, (many of them to be heavy goods vehicles) be a sustainable development? The Climate Change Act 2008 must be enforced. What are the projected levels of carbon emissions annually (and over the lifetime of the development), and how will this fit with climate change goals at international, national, sub-regional and local levels? We are concerned that the carbon footprint of the development has not been properly assessed.

Furthermore, sustainable development should be enabled and we are concerned that the only public transport services available consist of a single bus stop (600m from site) alongside limited bus services and a train station at a distance of 2.1km. In my view these public transport services are not sufficient for promoting the use of active travel.

The proposal is contrary to Development Management Policy T-3 Safety and Capacity on the Highway Network: 3.503 as capacity of the highway and motorway will be exceeded and there will be detrimental impacts.

## **Environment**

Core Policy CS8: 'Safeguarding and Improving the Environment' determines the approach to Green Infrastructure (GI). This proposal is contrary to that policy as it wants to "protect, develop and enhance an integrated network of high quality and multi-functional GI that will, improve health and well-being, and improve and enhance cross-boundary connectivity and accessibility through the delivery of joint development proposals including specifically the River Valleys". However, the proposal completely fails to protect (or connect) existing sites of nature conservation value. Harm to the environment would result if permission is granted.

## **Landscape Character Area**

Development Management Policy SIE-3A 'Protecting the Natural Environment' (section 3.345) states: "The borough's varying urban and rural landscapes, biodiversity, geodiversity and soils combine to create a unique and distinctive local character of considerable value to residents and visitors alike. This locally distinctive sense of place and character will be maintained and enhanced as follows". The policy then states that the Borough's urban and rural landscape will be conserved and enhanced in line with the borough's Landscape Character Assessment. CPRE is concerned that the Tame Valley Landscape Character Area will be adversely impacted by the introduction of further large scale employment sheds.

## **Congestion – air and noise impacts**

Development Management Policy SIE-3 'Controlling Pollution' (section 3.348) states: "New development that seeks to reduce air, noise, light, water or ground pollution in areas or locations where acceptable standards are already exceeded will be given positive consideration. New housing or other environmentally sensitive development will not be permitted where existing pollution levels are unacceptable and where there is no reasonable prospect that they can be satisfactorily reduced through specific measures or action programmes."

In terms of the actual proposal, the M60 at this particular location is subject to congestion at peak flow times and this causes queuing traffic for miles twice a day. The situation is particularly bad due to the position of low bridges at Ashton Road and Lingard Lane. Therefore, restricting HGV access (alongside air quality

monitoring) is important to ensure that the Council is not exceeding safe limits via approval of this application. It is considered that this proposal is for a substantial scale of development will exacerbate traffic congestion resulting in harmful air and noise pollution. The area is already part of the Manchester Airport Noise Contours. These are important planning issues that require full consideration.

## **Green Belt**

The majority of the site is located in protected Green Belt. The aim of Green Belt designation is to keep land permanently open. NPPF Section 13 Green Belt sets out the policy for decision makers. In my view, the land at this location (see Google Earth insert) performs the following Green Belt purposes:

- a. to check the unrestricted sprawl of large built-up areas: this development would extend the built area along the A6017 highway with the industrial estate abutting the Stockport boundary;
- b. to prevent neighbouring towns merging into one another – the green space (as identified on the Google Earth insert) is preventing Bredbury and Denton, two distinct places of Stockport and Oldham from coalescing with a slither of green space along the River Tame that cannot sustain a functional separation, both in terms of visual perception and form;
- c. the Green Belt has to assist in safeguarding the countryside from encroachment- the green space (as identified) is currently in excess of 600m in width, and therefore, people enjoy a sense of being in tranquil natural open space at Hulmes Wood and Haughton Dale Local Nature Reserves. If the development comes forward this green space would be reduced to below 200m. Therefore, users would experience built forms on either side of them and the sense of openness would be considerably reduced;
- d. to preserve the setting and special character of historic towns – I do not judge that this purpose is provided at the location; and
- e. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land – I consider that the prospect of plentiful brownfield land being invested in and brought forward for viable land uses will be thwarted if this development is allowed.

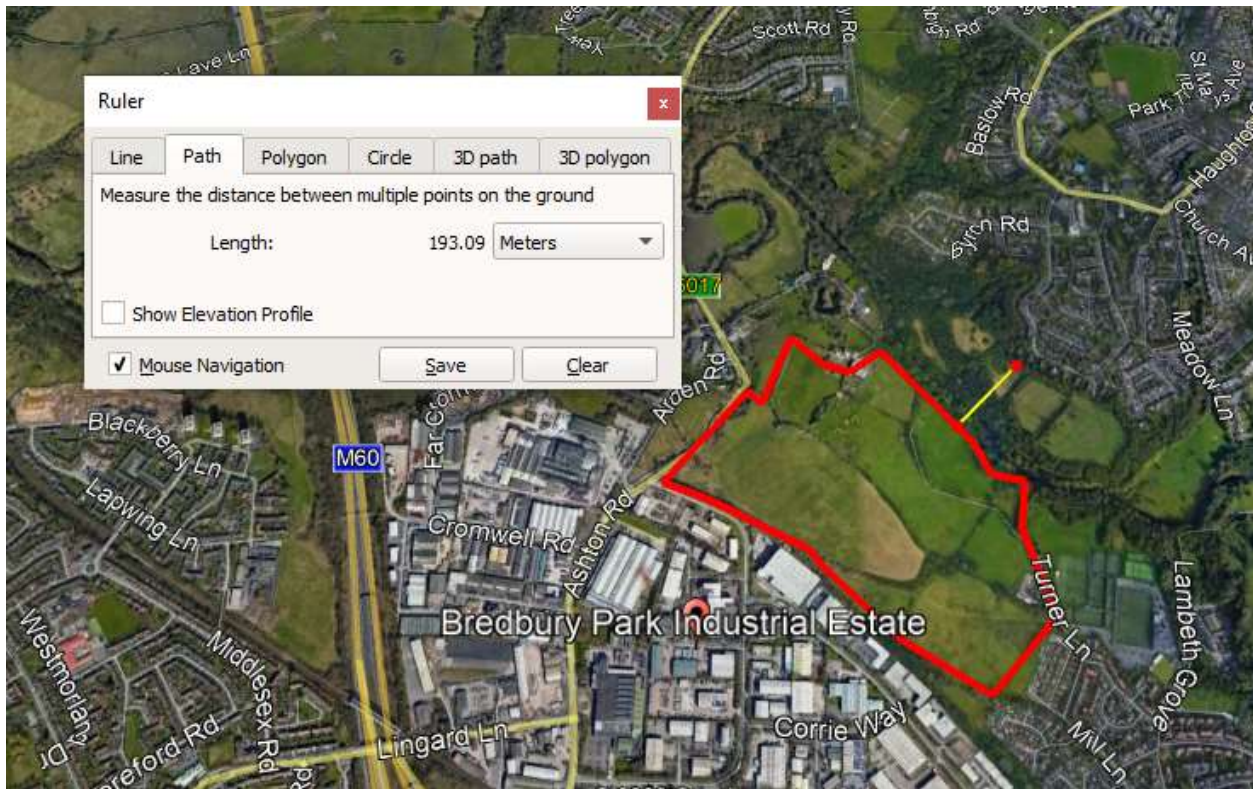


Fig 1.0 Extract from GoogleEarth, showing the site proximity to buildings to the north west.

There is a policy presumption against that development of the Green Belt unless 'Very Special Circumstances' are demonstrated. Having considered the application and supporting documents I consider that the case made for VSC is incorrect as the data, analysis and assumptions are flawed. The Green Belt designation is not intended to be interpreted as presented by Lichfield in their Planning Statement.

Although the Greater Manchester Spatial Framework Policy GM Allocation 34 includes this site, the draft is at an emerging stage and is therefore of limited weight in the ultimate determination of this proposal. Furthermore, release of Green Belt is being hotly objected by the local communities with support from democratically elected representative-constituency MPs such as Andrew Gwynne and William Wragg. Also, the Combined Authority (led by Andy Burnham, Greater Manchester Mayor) has made development commitments focussing on urban concentration alongside a commitment to reuse the significant brownfield land resources as a priority (see *Our Strategy* policies GM-Strat 1 to 14). Any Green Belt release at this time is being targeted to sustainable extension locations that are deficit in job investment i.e. to the M62 North East corridor for employment land. Therefore this proposed allocation does not support the over-arching policy of regeneration.

## **Loss of Agricultural Land**

A key harm that would be caused if the application were allowed would be the loss of agricultural land and removal of ability of future generations to produce food. There is also an associated adverse impact on the number of farm jobs both directly and indirectly in the supply and customer chains. In considering the growth economic sectors across the North West (and in particular Greater Manchester) it should be noted that the food and drink sector is currently buoyant. However, given the imminent departure from the European Union (and the absence of trade deals with other markets), the Council must consider protecting local food security as a priority. Such protections should include safeguarding agricultural land and/or land that could be used for agricultural purposes in the future.

## **Positives**

We acknowledge the proposal will provide jobs, however we query the assumptions behind the 'jobs created' figure, and argue that the same number of jobs could be brought forward on an alternative site without the harm of Green Belt loss at this location.

Technological advances mean that land hungry warehousing and distribution centres actually employ very few humans, thereby yielding a very low job density. In recent similar cases, such as Florida Farm in St Helens, the claimed job numbers have failed to materialise while locals suffer adverse impacts arising from inconsiderate HGV parking, HGV use of local roads, residential amenity and ongoing operations – all despite being subject to planning conditions. Enforcement of stipulated planning conditions are apparently lacking due to capacity constraints of the Council. The situation is making local living conditions difficult and we fear the same for the Tame Valley area and local residences should this application be approved. Finding an alternative site should bring approximately the same level of jobs and may, in reality, have a more beneficial impact to delivering the local plan policies and allocations.

## **Planning Balance**

I have judged that there are in fact no Very Special Circumstances and that the harm to the national planning designation of Green Belt, and to local economic, social and environmental factors are such that it outweighs

the claimed benefits, leading to a negative planning balance. I therefore recommend that the only option for the Council in the context of the town and country planning legislation is to refuse the development.

This is a gigantic, speculative 'off local plan' site located to the north west of an existing industrial estate. Due to the harms outweighing the benefits there is a negative planning balance. For this reason the application should be refused.

If you would like to discuss any aspect of this letter please contact me without delay,

Yours sincerely



**Jackie Copley MRTPI MA BA(Hons) PgCERT**

Planning Manager

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