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Patron Her Majesty The Queen President Emma Bridgewater CBE Group President Nick Thompson Group Chair Debbie McConnell Scientific Adviser Dr Des Brennan

Dear Inspector,

CPRE, the countryside charity, considered the application to construct three large scale B2/B8 sheds at more than 90,000 sqm with associated infrastructure at Land bounded by Ashton Road and the River Tame at Bredbury Industrial Estate and recommended refusal by Stockport Council in March 2020. CPRE retains its objection to the appeal due to the following issues.

**Green Belt** – The majority of the site is in the Green Belt, which aims to keep land permanently open. The employment sheds are inappropriate in the terms of National Planning Policy Framework and four of the five functions, set out in NPPF para. 138, would be harmed to a great extent. The proposed development would:

- a) lead to unrestricted sprawl along the A6017 highway with the industrial estate abutting the Stockport boundary;
- b) cause the neighbouring areas of Bredbury and Denton, two distinct areas of Stockport and Tameside to coalesce;
- c) lead to urban forms encroaching into the countryside of Hulmes Wood and Haughton Dale Local Nature Reserves reducing the green space from 600m to below 200m;
- d) not be applicable to the function of preserving the setting and special character of historic towns in this case; and
- e) undermine the regeneration of the 69 brownfield sites identified on Stockport's Brownfield Register in 2020, totalling an area of 165.71 hectares.

The development would leave only a slither of green space along the River Tame that cannot sustain functional separation, either spatially, or visually.

Recently Stockport Council decided not to approve the Greater Manchester Joint Development Plan due to public opposition to the Green Belt sites proposed to be released for jobs and housing. Stockport is now progressing a new local plan. Approval of this site would frustrate the local plan process.

**Climate emergency** – Core Strategy Policy CS1 sets out the local plan policy for Stockport and it sets out that the Council. A material consideration is that in March 2019, Stockport Council declared a climate emergency and agreed to become carbon neutral by 2038. The proposal will not enable Stockport Council to deliver against Policy CS1 or the declaration as it adds increased HGV road-based traffic.

**Environment** – The proposal is contrary to Local Plan Core Policy CS8: Safeguarding and Improving the Environment, which determines the approach to Green Infrastructure in Stockport. CPRE considers that the development design falls short of the requirement set out in paragraph 3.285 that requires a high standard of design and promotes a sense of place. We do not accept that the development contributes positively paying regard to the local natural features or the historic environment. CPRE is concerned about the nature within and near to the site, and function as an ecological corridor, if permission is granted, and CPRE echoes the concerns of the Wildlife Trust. In addition to wildlife, people have increasingly valued their local greenspace for

recreation and the health and well-being benefits during the Covid pandemic. CPRE considers that the proposal will harm the existing network of greenspace around the River Tame and by reducing local connectivity will have an adverse impact on the health and well-being of local people who enjoy the relative tranquillity. These people live in some of the more disadvantaged areas of Stockport and Tameside that are already burdened with health inequalities.

**Landscape character** - CPRE is concerned that the Tame Valley Landscape Character Area will be adversely impacted by the introduction of further large-scale employment sheds contrary to Development Management SIE-3A. The applicant in our view has downplayed the sensitivity of the landscape and the development effects from the large-scale sheds. The local landscape is of tremendous value to local people and the impact of the development should be fully acknowledged. The applicant did not consult with local people or stakeholders during the landscape assessment.

**Loss of farmland** – the development of the employment sheds will lead to an irreversible loss of agricultural land. CPRE believes future generations will need the ability to grow food.

**Traffic congestion** – There are problems with congestion on the strategic road network and the proposal will induce additional traffic that will lead to further issues of congestion, contrary to Development Management Policy T-3. There is an insurmountable issue relating to a narrow rail bridge on Ashton Road to complicate the routing of HGVs to consider.

**Air quality** – Poor air quality linked to transport emissions and HGV vehicles are highly polluting in terms of greenhouse gases and particulates leading to poor health including respiratory disease in the local population. CPRE does not accept the proposal will support Stockport's Core Strategy Objective 5c. that sets out that the Council will seek to assist improvements in air quality through spatial planning and transport infrastructure planning and Objective 6g. that seeks to improve air quality, particularly within Air Quality Management Areas. CPRE considers that the proposal will lead to increases in air pollution contrary to Development Management Policy SIE-3.

**Noise** – the additional induced road activity and site operations will introduce additional noise to an area that is relatively tranquil.

**Benefits** – Recently CPRE gave evidence at inquiries in St Helens where the scale of jobs claimed by applicants was found to be exaggerated due to the reliance on job growth that are too high when considering economic realities and use of job density figures that are out of date. Technological advances means that many B2/B8 uses do not in reality achieve estimated jobs and future automation means this is set to worsen. Also, the nature of the employment contracts is insecure with zero-hour contracts and low value in terms of Gross Value Added. Covid has changed the way people live and how businesses operate, with more commercial property being repurposed in our towns and cities. CPRE believes Stockport should revisit assumptions about land requirements for employment needs. Therefore, the claimed jobs and economic benefits are in CPRE's view overstated and not enough to justify the very special circumstances needed to trigger the grant of permission in the Green Belt.

The extent of Green Belt harm and other adverse impacts when considered weigh against the limited benefits of the proposal.

CPRE consequently recommends that the appeal should be dismissed.

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