

ITEM 1

Application Reference	DC/074399
Location:	Land Bounded By Ashton Road, The River Tame, Turner Lane And Bredbury Industrial Estate
PROPOSAL:	<p>Part A: Outline planning permission with all matters reserved for the creation of a commercial/industrial development providing up to 53,327 sqm of B2/B8 employment floor space (including ancillary office accommodation) 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).</p> <p>Part B: Full planning permission for the creation of two commercial/industrial units comprising 39,857 sqm (including ancillary office accommodation), strategic landscaping, the widening and realignment of Bredbury Park Way and the relocation of its junction with Ashton Road, along with the provision of other associated infrastructure (including access, parking and internal landscaping).</p>
Type Of Application:	Outline Application
Registration Date:	10.02.2020
Expiry Date:	20200511
Case Officer:	Rebecca Andison
Applicant:	Quorum Estates Limited, Edmund Hargreaves Ogden, Joanne L...
Agent:	Lichfields

COMMITTEE STATUS

Under the Council's adopted scheme of delegation this planning application is deemed strategic in nature and comprises EIA Development, as such the application is firstly referred to Werneth Area Committee and Central Area Committee for comments in advance of consideration by Planning and Highways Regulation Committee.

If members are minded to grant planning permission the application will need to be referred to the Secretary of State for Housing, Communities and Local Government to give him the opportunity to determine the application due to the application being major development within the Green Belt.

DESCRIPTION OF PROPOSED DEVELOPMENT

The application contains detailed and outline elements and is submitted as a Hybrid planning application. Each component part is described in detail below:

Detailed element

Full planning permission is sought for the erection of two commercial/industrial units comprising 39,857 sqm of B2/B8 floorspace (including ancillary office

accommodation), a new access road into the site from Bredbury Parkway, the widening and realignment of Bredbury Parkway and the construction of a relocated junction with Ashton Road. The detailed element also includes internal estate roads and the provision of a significant landscape buffer in the north eastern part of the site.

The larger of the two units would have a gross external area of 27,479 sqm. It includes 1,376 sqm of ancillary office accommodation and staff facilities. The second unit measures 12,378 sqm with 576 sqm of ancillary office/staff accommodation.

The units would be positioned within the western part of the site, adjacent to the existing eastern boundary of the employment area and next to the access from Bredbury Parkway. There would be car parking at the side of each unit and trailer parking at the front. A new access would be created from Bredbury Parkway with an internal estate road running north to serve the two units.

Both units have shallow pitched roofs, with a ridge height of 22.09m for unit 1 and 19.16m for unit 2. They would be clad in a mixture of horizontally and vertically laid cladding with contrasting materials for the ancillary office accommodation and to highlight the entrances. The office accommodation features curtain wall glazing and strip windows and there would panels of contrasting cladding to break up the elevations. A gatehouse is proposed on the access road between the two buildings. This is a single storey building (24 sqm) finished in grey cladding with a mono-pitched roof.

A new priority-controlled access is proposed from Bredbury Park Way. This provides one lane to enter the site, two lanes to exit and a pedestrian refuge. A pedestrian footway is proposed on the southern side of the access and a cycleway/footway would be provided along the northern side.

Landscape buffer zones are proposed along the north eastern boundary with the River Tame and the boundaries with Bredbury Parkway and Ashton Road.

Outline element

Outline planning permission with all matters reserved is sought for a commercial/industrial development providing up to 53,327 sqm of B2/B8 floorspace. Associated infrastructure including new roads, car parks, landscaping, footpaths and a car park to serve Stockport Sports Village is also proposed.

A parameters plan has been submitted to establish the broad parameters for the outline part of the proposal. This sets the minimum and maximum building heights, landscape buffer zones, finished floor levels and the location of a dedicated car park to serve Stockport Sports Village.

Up to 40% of the development would be used for B2 floorspace and between 60 and 100% for B8 floorspace. The minimum unit size would be 4,500 sqm. A car park to serve the Sports Village, funded by the applicant, would be located adjacent to the southeast boundary to allow a footpath link to be created onto Turner Lane.

Buildings within the south eastern part of the site adjacent to Castle Hill Park would not exceed 19.5m in height, and there is a small pocket of land adjacent to Stockport Sports village where the height to ridge would be restricted to a maximum of 16.5m. The entire northern half of the site located beyond Units 1 and 2 would be subject to a maximum height to ridge of 19.5 metres.

The parameters plan includes a landscape buffer zone around the boundaries of the site. The detailed landscape scheme would be agreed when an application is made for the approval of reserved matters.

The site is crossed by a number of public rights of way. These would be retained where possible or diverted through landscaped areas within the site. The section of Turner Land which connects Ashton Road to Stockport Sports Village would be diverted and upgraded to a public bridleway.

Background

A planning application seeking outline planning permission for up to 116,129 sqm of B2/B8 floorspace was originally submitted in August 2019. In February 2020, the scope of this application was amended in order to seek detailed approval for 39,857 sqm, with outline approval sought for up to a further 76,272 sqm (totalling 116,129 sqm).

The scope of the current application has been further varied to reduce the quantum of development and facilitate the creation of a larger landscape buffer between the site and the River Tame. This has reduced the net developed area within the site to 21.46 ha, a circa. 15% reduction over the Initial submission. It has resulted in a 20% reduction in the quantum of proposed floorspace, with approval now sought for a total up to 93,184 sqm. The reduction in floorspace and site area has been proposed to reduce harm to the Green Belt.

In addition to the reduction in floor space, the revised scheme has resulted in a significant increase to the landscape buffer between the site and the River Tame. The buffer has increased from 10m on the initial scheme to over 50m in width in the proposal now before you.

Submission Summary

The application is accompanied by an Environmental Statement (ES), which includes chapters on the following environmental effects:

- Highways
- Noise and vibration
- Air Quality
- Flood risk and drainage
- Biodiversity
- Ground conditions
- Landscape and visual impact
- Arboriculture
- Socio-economics

The ES has been supplemented during the course of the application process with further information including a revised Biodiversity Chapter (January 2021).

The following documents have also been submitted in support of the application:

- Crime Impact Statement
- Planning statement
- Design and Access Statement
- Employment and Skills Note
- Energy Statement
- Utilities Statement
- Agricultural Land Use Classification
- Historic Environment Desk-based Assessment
- Mineral Resource Assessment
- Statement of Community Involvement
- Lighting Assessment
- Ecological Assessment
- Badger Survey and Mitigation Strategy

DESCRIPTION OF THE SITE AND SURROUNDINGS

The site extends to approximately 30.90 hectares and is located immediately to the north of Bredbury Park Industrial Estate within the wards of Bredbury and Woodley.

The site is bounded by the River Tame to the north east which marks the boundary between Stockport and Tameside. Beyond the Tame Valley is the predominantly residential area of Haughton Green. The Botany Mill Site of Biological Importance lies between the south bank of the River Tame and the north east boundary of the site.

Part of the site's north west boundary is located adjacent to Ashton Road and the remainder abuts agricultural land. Ashton Road runs north from Junction 25 of the M60 and connects Bredbury to Denton, which lies approximately 600m to the north of the site. Bredbury Park Way joins Ashton Road approximately 800m from the northernmost roundabout of the M60 junction. Buildings on Ashton Road close to the site include Castle Croft Kennels, the Arden Arms public house and Horse Shoe Farm. Castle Hill Farm House is a grade II Listed Building and currently in residential use. The agricultural land to the north west is bounded by Arden Road which connects Ashton Road with Turner Lane.

Turner Lane runs along the sites north eastern boundary linking Ashton Road with Mill Lane in the east. The area to the south east of the site is predominantly residential in character. On the west side of Mill Lane, adjacent to the sites south east boundary, is Castle Hill Residential Park, and there are further residential properties on Lowick Green immediately to the south. Stockport Sports Village lies to the north east of the site, at the junction of Mill Lane and Turner lane.

The site's southern boundary is adjacent to Bredbury Park Way and units within the existing industrial estate.

With the exception of a strip of land adjacent to Bredbury Park Way, the application site is located wholly within the greenbelt as defined by the Stockport Unitary Development Plan. It also lies within the Tame Valley Landscape Character Area as defined by Policies LCR1.1 and LCR1.1a. It is described as follows:

E. Tame Valley

The Tame Valley in the northern part of the Borough is a LCA where substantial environmental and recreational improvements have been implemented over many years through joint working and countryside management schemes. The valley includes several environmental designations including Country Park, Local Nature Reserve and several Sites of Biological Importance. Protection and enhancement of this valuable resource which serves some of the more urbanised parts of the Borough will continue to be central to the Council's approach. In the southern part the LCA overlaps with the Town Centre/M60 Gateway area and in this area there are a number of potential development sites where the impact of proposals on the LCA will be an important factor.

The site comprises agricultural fields, which are divided by hedgerows and trees, and crossed by a number of public rights of way. Three ponds are also found across the site.

There are two existing farms within the site. Finland Park Farm is located off Turner Lane to the east and is used to provide accommodation for a variety of animals. Mill Hill Farm is located in the north west part of the site and is used for the stabling and grazing of horses.

ENVIRONMENTAL STATEMENT

The application is accompanied by an ES and supplemented by further environmental information that is considered to satisfy the requirements of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. It is considered that sufficient information has been provided to assess the environmental impact of the proposed development.

The ES includes chapters on the following environmental effects and assesses their significance both before and after mitigation measures.

- Highways
- Noise and vibration
- Air Quality
- Flood risk and drainage
- Biodiversity
- Ground conditions
- Landscape and visual impact
- Arboriculture
- Socio-economics

The ES sets out the results/findings of the EIA, including proposals of a number of mitigation measures that would be implemented to prevent and/or

minimise any adverse effects. These are set out under a series of separate chapters which are as summarised below.

The ES has been supplemented during the course of the application process with further information submitted, including a revised Biodiversity Chapter.

Chapters A - C provide an introduction to the application, a description of the proposed development and set out the scope and methodologies used. Chapters D – L contain an assessment of the effects listed above, which are discussed in detail in the following sections of this report. Chapter M contains details of the proposed mitigation and monitoring measures proposed to offset any adverse effects on the environment.

Chapter D (Highways) – The location of the site and proposed mitigation provides the opportunity for future employees to use sustainable modes of transport to access the site and minimise the number of single car journeys. The effect of the development on the highways network is being mitigated for through significant highways investment resulting in a safe and accessible location. The construction phase would be of negligible significance, and mitigation will be provided through a Construction Environmental Management Plan (CEMP). Once operational the development would only have a negligible impact on traffic flows, safety and delay due to the upgrades to the network and sustainable transport measures.. It is concluded that the development would not result in any significant negative impact on the highway network.

Chapter E (Noise and vibration) - There are a number of residential properties within 100m of the site boundary and these properties could be affected by noise during the construction phase of the development. The ES divides the construction work into for phases and assesses the noise levels likely to be generated by each. A '*Minor Adverse*' impact from noise and vibration is predicted at the worst affected receptor during the noisiest phase of the work. To assess the impact of noise during operation a detailed acoustic model has been produced. As series of mitigation measures are proposed including acoustic barriers, machinery silencers, and siting plant appropriately. With these measures the effect of operational noise is reduced to '*Minor Adverse*'.

Chapter F (Air Quality) - Potential impacts of the development during the construction phase include dust from demolition and earthworks, vehicles travelling over unpaved ground, the handling of dusty materials, cutting activities and dust being tracked out of the site by heavy vehicles. Mitigation measures to address these impacts would be set out in a Construction Management Plan. With these measures in place the residual effects are judged to be '*not significant*'. Traffic generated by the development once operational would have a '*Negligible*' effect on nitrogen dioxide levels at most locations assessed. Where '*Slight Adverse*' to '*Moderate Adverse*' effects occur, nitrogen dioxide levels would remain below objective levels. Annual mean concentrations of PM₁₀ and PM_{2.5} also remain below objective levels at all receptors. It is concluded that the development would not result in any significant negative impact on air quality.

Chapter G (Flood risk and drainage) - The development would result in a significant increase in hardstanding and surface water runoff rates, which could result in a substantial increase in flood risk. It would also result in an increase in foul water discharge and could impact on water quality through fuel/chemical spillage. To mitigate the impact of the development it is proposed to control surface water discharge rates and volumes, using sustainable drainage systems where possible. With these measure in place the residual effects are assessed as '*minor*' or '*negligible*'.

Chapter H (Biodiversity) - The site comprises semi-improved grassland, scrub, hedgerows, trees, ponds and a farmyard with numerous buildings. It is not subject to any statutory or non-statutory designations. As the development would result in the loss of the vast majority of the existing habitat an extensive mitigation package is proposed, including additional on-site landscaping, with a substantial landscape buffer around the sit boundaries, and off-site mitigation in the form of a commuted sum towards habitat improvement at Woodhall Fields and Reddish Vale Country Park. After mitigation there would be a 10.32% net habitat gain and a 10.0% gain in hedgerows. It is concluded that the residual environmental impacts on protected sites, habitats, bats and nesting birds are '*Negligible*' and the effects on badger '*Moderate*'.

Chapter I (Ground conditions) - Potential risks to human health from contamination have been identified at only one location within the site, and as this area can be mitigated by removing the source of contamination or installing suitable protection measures, the overall risk from the site is considered low. The risk to controlled waters and the wider environment is also considered to be low. With suitable controls in place during the remediation and enabling works, the spread of contaminants and risk of dust to the wider area and third parties can be managed effectively. Gas monitoring has determined that mitigation will be required to reduce the risk to end users, and mine stabilisation works will be required to address underlying shallow mine workings. The residual effects of the development are considered to be '*Negligible*'.

Chapter J (Landscape and visual impact) - Without mitigation the development is described as having adverse effects in terms of both landscape character and visual impact, with the effects ranging from '*minor adverse*' at a district level to a '*moderate to major adverse*' impact on the site itself, PRow with the site and views from houses closest to the site boundary. The development has been designed to reduce the visual impact by siting the buildings away from the Tame Valley, limiting building heights and including significant areas of landscaping around the site boundaries. With mitigation the residual effects on landscape character will vary between '*Negligible Adverse*' at national level, to '*Minor Adverse*' at district level and '*Moderate - Major Adverse*' for the site and immediate context. The visual effects upon completion of the development will vary from '*Negligible*' to '*Major Adverse*' depending upon proximity, degree of screening and sensitivity of the receptor. The majority of receptors are considered to experience effects of between '*Negligible*' and '*Minor Adverse*' significance. There are some receptors subject to '*Moderate to Major*' or '*Major Adverse*' effects, but these are limited to residential receptors in closest proximity to the site boundary and users of existing public rights of way. In

the longer term, some visual effects may be reduced by new landscape buffer and planting proposals to the site's boundaries.

Chapter K (Arboriculture) - There are nine individual trees, sixteen tree groups, one woodland and five hedges within the site, with further trees along the site boundaries. The ES sets out that the removal of these will initially have a '*moderate adverse*' effect but the impact will be reduced by the implementation of mitigation measures. It concludes that with the implantation of a well-designed landscape scheme the residual effects would be '*moderate beneficial*'.

Chapter L (Socio-economics) - The site is well placed to bring about socio-economic benefits due to its location close to the area of Brinnington, which experiences high levels of unemployment and deprivation. The most significant socio-economic impacts of the development on the local economy include an investment of around £77 million over the 5-year construction period; the creation of 126 FTE direct construction jobs per annum over the duration of the development phase, plus 189 indirect FTE jobs across the wider economy; between 994 to 1,518 FTE jobs at the site during operation; improvements to the socio-economic outcomes of deprived areas and the creation new jobs which are to suit the local demographic in Brinnington and Tameside. The residual effects of the development once operational are described as '*minor beneficial*' to '*substantial beneficial*'.

Non-technical summary – this document gives a brief overview of the main findings of the ES in an easily understandable and accessible format.

POLICY BACKGROUND

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications/appeals to be determined in accordance with the Statutory Development Plan unless material considerations indicate otherwise.

The Statutory Development Plan includes:-

- Policies set out in the Stockport Unitary Development Plan Review (SUDP) adopted 31st May 2006 which have been saved by direction under paragraph 1(3) of Schedule 8 to the Planning and Compulsory Purchase Act 2004;
- Policies set out in the Stockport Local Development Framework Core Strategy Development Plan Document (CS) adopted 17th March 2011; and
- The Greater Manchester Minerals Plan adopted April 2013.

N.B. Due weight should be given to relevant SUDP and CS policies according to their degree of consistency with the National Planning Policy Framework ('NPPF') issued on 19th February 2019 (the closer the policies in the plan to the policies in the NPPF, the greater the weight that may be given); and how the policies are expected to be applied is outlined within the Planning Practice Guidance ('PPG') launched on 6th March 2014.

Saved policies of the SUDP Review

LCR1.1 Landscape Character Areas (Heald Green Fringe)
 LCR1.1a The Urban Fringe including the River Valleys
 NE1.1 Sites of Special Nature Conservation Importance
 NE1.2 Sites of nature Conservation Importance
 EP1.7 Development and Flood Risk
 GBA1.1 Extent of Green Belt
 GBA1.2 Control of Development in Green Belt
 GBA2.1 Protection of Agricultural Land
 L1.1 Land for Active Recreation
 L1.2 Children's Play
 L1.7 Recreation Routes: Maintenance and Expansion of Network
 L1.9 Recreation Routes and New Development
 E1.1 Location of New Industrial Development
 TD2.2 Quiet Lanes
 MW1.5 Control of Waste from Development

LDF Core Strategy/Development Management policies

CS1: Overarching Principles: Sustainable Development – Addressing Inequalities and Climate Change
 SD-1: Creating Sustainable Communities
 SD-3: Delivering the Energy Opportunities Plans - New Development
 SD-6: Adapting to the Impacts of Climate Change
 AS-1 The Vitality and Viability of Stockport's Service Centres
 AS-2: Improving Indoor Sports, Community and Education Facilities and their Accessibility
 CS7 Accommodating Economic Development
 CS8: Safeguarding and Improving the Environment
 SIE-1: Quality Places
 SIE-3: Protecting, Safeguarding and Enhancing the Environment
 CS9: Transport and Development
 CS10: An Effective and Sustainable Transport Network
 T-1: Transport and Development
 T-2: Parking in Developments
 T-3: Safety and Capacity on the Highway Network

Supplementary Planning Guidance

Supplementary Planning Guidance does not form part of the Statutory Development Plan; nevertheless, it does provide non-statutory Council approved guidance that is a material consideration when determining planning applications.

- Employment and Training SPD
- Open Space Provision and Commuted Sum Payments
- Sustainable Transport SPD
- Sustainable Design and Construction SPD

National Planning Policy Framework

A Revised National Planning Policy Framework (NPPF) issued by the Secretary of State for Housing, Communities and Local Government (MHCLG) on 19th February 2019 replaced the previous NPPF (originally issued 2012 & revised 2018). The NPPF has not altered the fundamental legal requirement under Section 38(6) of the Planning and Compulsory Purchase Act 2004 that decisions must be made in accordance with the Development Plan unless material considerations (such as the NPPF) indicate otherwise.

The NPPF representing the governments up-to-date planning policy which should be taken into account in dealing with applications focuses on achieving a lasting housing reform, facilitating the delivery of a greater number of homes, ensuring that we get planning for the right homes built in the right places of the right quality at the same time as protecting our environment. If decision takers choose not to follow the NPPF, then clear and convincing reasons for doing so are needed.

N.B. In respect of decision-taking the revised NPPF constitutes a “material consideration”.

Introduction

Para.1 “The National Planning Policy Framework sets out the Government’s planning policies for England and how these should be applied”.

Para.2 “Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise”.

Achieving sustainable development

Para.7 “The purpose of the planning system is to contribute to the achievement of sustainable development”.

Para.8 “Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

- a) an economic objective
- b) a social objective
- c) an environmental objective”

The presumption in favour of sustainable development

Para.11 “Plans and decisions should apply a presumption in favour of sustainable development.

For decision-taking this means:

- c) approving development proposals that accord with an up-to-date development plan without delay; or
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole”.

Para.12 “.....Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed”.

Decision taking

Para.38 “Local planning authorities should approach decisions on proposed development in a positive and creative way..... Decision-makers at every level should seek to approve applications for sustainable development where possible”.

Para.47 “Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing”.

Determining applications

Para. 48. “Local planning authorities may give weight to relevant policies in emerging plans according to:

- a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).”

Para. 49. “However in the context of the Framework – and in particular the presumption in favour of sustainable development – arguments that an application is premature are unlikely to justify a refusal of planning permission other than in the limited circumstances where both:

- a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan; and
- b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.”

Para. 50. “Refusal of planning permission on grounds of prematurity will seldom be justified where a draft plan has yet to be submitted for examination; or – in the case of a neighbourhood plan – before the end of the local planning authority publicity

period on the draft plan. Where planning permission is refused on grounds of prematurity, the local planning authority will need to indicate clearly how granting permission for the development concerned would prejudice the outcome of the plan-making process.”

Planning conditions and obligations

Para 54. “Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition”.

Para 55. “Planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. Agreeing conditions early is beneficial to all parties involved in the process and can speed up decision making. Conditions that are required to be discharged before development commences should be avoided, unless there is a clear justification”.

Para 56. “Planning obligations must only be sought where they meet all of the following tests:

- a) necessary to make the development acceptable in planning terms;
- b) directly related to the development; and
- c) fairly and reasonably related in scale and kind to the development”.

Building a strong and competitive economy

80. “Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential”.

82. “Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations”.

Open space and recreation

Para.96 “Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate”.

Para.97 “Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- b) the loss resulting from the proposed development would be replaced by Equivalent or better provision in terms of quantity and quality in a suitable location; or
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.”

98. Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.

Promoting sustainable transport

Para.108 “In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- b) safe and suitable access to the site can be achieved for all users; and
- c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”

Para.109 “Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

Para.110 “Within this context, applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.”

Making effective use of land

Para.117 “Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’

land.”

Para. 118 “Planning policies and decisions should:

- a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;
- b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;
- c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;
- d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure).”

Achieving well designed spaces

Para.124 “The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities”.

Para.127 “Planning policies and decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”

Para.130 “Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents. Conversely, where the design of a development accords with clear expectations in plan policies, design

should not be used by the decision-maker as a valid reason to object to development”.

Protecting greenbelt land

133. “The Government attaches great importance to Green Belts. 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”.

134. “Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land”.

Proposals affecting the greenbelt

143. “Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances”.

144. “When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations”.

145. “A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

- a) buildings for agriculture and forestry;
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e) limited infilling in villages;
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would: – not have a greater impact on the openness of the Green Belt than the existing development; or – not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority”.

146. "Certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These are:

- a) mineral extraction;
- b) engineering operations;
- c) local transport infrastructure which can demonstrate a requirement for a Green Belt location;
- d) the re-use of buildings provided that the buildings are of permanent and substantial construction;
- e) material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and
- f) development brought forward under a Community Right to Build Order or Neighbourhood Development Order".

Meeting the challenge of climate change, flooding and coastal change

Para.148 "The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure."

Para.153 "In determining planning applications, local planning authorities should expect new development to:

- a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and
- b) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption".

Planning and flood risk

Para.163 "When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:

- a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;
- b) the development is appropriately flood resistant and resilient;
- c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;
- d) any residual risk can be safely managed; and
- e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan."

Para.165 "Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:

- a) take account of advice from the lead local flood authority;

- b) have appropriate proposed minimum operational standards;
- c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and
- d) where possible, provide multifunctional benefits.”

Conserving and enhancing the natural environment

Para.170 “Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.”

Habitats and Biodiversity

Para.175 “When determining planning applications, local planning authorities should apply the following principles:

- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
- c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and
- d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially

where this can secure measurable net gains for biodiversity.”

Ground conditions and pollution

Para.178 “Planning policies and decisions should ensure that:

- a) a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation);
- b) after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and
- c) adequate site investigation information, prepared by a competent person, is available to inform these assessments.”

Para.179 “Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.”

Para.180 “Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

- a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;
- b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and
- c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.”

Para.181 “Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan”.

Heritage Assets

Para.184: “Heritage assets range from sites and buildings of local historic value to those of the highest significance.....these assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance so that they

can enjoyed for their contribution to the quality of life of existing and future generations.”

Para.190 “Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.”

192. In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness.

Para.193 “When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”

Implementation

Para.213 “Existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of this Framework. Due weight should be given to them, according to their degree of consistency with this Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given)”.

Planning Practice Guidance

The Planning Practice Guidance (NPPG) is a web-based resource which brings together planning guidance on various topics into one place (launched in March 2014) and coincided with the cancelling of the majority of Government Circulars which had previously given guidance on many aspects of planning. The following sections are considered relevant to this proposal:

What factors can be taken into account when considering the potential impact of development on the openness of the Green Belt?

Assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgment based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:

- openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;

- the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and
- the degree of activity likely to be generated, such as traffic generation.

Paragraph: 001 Reference ID: 64-001-20190722

How can the strategic policy-making authority ensure that compensatory improvements to the environmental quality and accessibility of the Green Belt will be secured?

Identifying the scope for compensatory improvements is likely to require early engagement with landowners and other interest groups, once the areas of land necessary for release have been identified. Consideration will need to be given to:

- land ownership, in relation to both land that is proposed to be released for development and that which may be most suitable for compensatory improvements for which contributions may be sought;
- the scope of works that would be needed to implement the identified improvements, such as new public rights of way, land remediation, natural capital enhancement or habitat creation and enhancement, and their implications for deliverability;
- the appropriate use of conditions, section 106 obligations and the Community Infrastructure Levy, to secure the improvements where possible. Section 106 agreements could be used to secure long-term maintenance of sites.

Paragraph: 003 Reference ID: 64-003-20190722

RELEVANT PLANNING HISTORY

There is no planning history for this site.

STATEMENT OF COMMUNITY INVOLVEMENT

The applicant has submitted a Statement of Community Involvement which details the public consultation that was carried out by Lexington Communications on behalf of Quorum ahead of submitting the planning application. Early public engagement is encouraged by the Government in Para.40 of the NPPF which advises that LPA's should *"encourage any applicants who are not already required to do so by law to engage with the local community and where relevant, with statutory and non-statutory consultees before submitting their applications."*

The Statement of Community Involvement advises that the following consultation activities were carried out.

- Correspondence was issued to elected representatives, including: Leader of SMBC; Cabinet Member for Economy & Regeneration at SMBC; ward members for Bredbury & Woodley and Brinnington & Central; all members of the Planning & Highways Regulation Committee; Members of Parliament for Hazel Grove and Denton & Reddish.

- Letters were also issued to the following key stakeholders and organisations: SMBC Chief Executive; Greater Manchester Combined Authority; Greater Manchester Chamber of Commerce; and the Greater Manchester Local Enterprise Partnership. The letters provided information on the proposals, invited them to the public consultation event and offered the opportunity to contact the development team if they had any questions.
- An information leaflet was distributed to approximately 4,500 local residential and business addresses (including current Bredbury Industrial Estate occupiers) in close proximity the site to inform them of the planning application and the variety of opportunities to participate in the public consultation.
- A press release was issued to local and industry media outlets to raise awareness of the scheme and encourage participation in the public consultation.
- A bespoke project website was produced (www.bredburygateway.co.uk) which provided information on the proposals and an online feedback form to collect the views and comments from local residents and interested third parties.
- Facebook adverts were launched to the local area to provide information on the plans and provide a pathway to the consultation website via social media. The adverts reached over 40,000 Facebook users and saw more than 2,500 people click through to the project website. A Facebook page was also established detailing information about the consultation and including links to the project website.
- A public exhibition was held on Thursday, 14th June 2018 at Stockport Sports Village, Lambeth Grove, Woodley, Stockport, SK6 1QX. Approximately 95 people attended the event, with 31 attendees completing the questionnaire.
- A community information line, 0161 711 0293, was established for residents and other stakeholders to speak directly with members of the development team.

A total of 201 responses were received across the consultation newsletter leaflet, public exhibition questionnaire and website. In summary, the response from the local community was mixed; with the number of respondents that did not support the proposals slightly outweighing those that were in favour. Respondents raised concerns about the impact of the proposals on local roads and traffic, the loss of Green Belt land and the number of existing derelict units on the industrial estate. Those in favour of the development recognised that the plans would generate much-needed jobs.

NEIGHBOUR/PUBLIC CONSULTATION

The application has been advertised (as a departure from the Development Plan, Major EIA development and development affecting PRow) by way of a press notice in the Stockport Express (02.10.2019) and notices displayed around the site.

The owners/occupiers of 117no. properties were initially notified by letter on 30/09/2019. Following amendments being made to the application neighbouring properties were re-notified on 10.02.2020 and on the 14.12.2020. The application was also re-advertised in the local press on 23.12.2020 and new notices displayed around the site on 21.12.2021.

Representations have been received from 814no. addresses in total comprising 66no. supporting the application, 745no. objecting and 3no. from those with a neutral stance. 373no. individual letters of objection were received in response to the latest consultation carried out on 14.12.2020.

Note: The total number of addresses above is the number registered in Uniform less 174 duplicate addresses, 5 blank lines with contributor ticks and 1 duplicate comment (neutral).

Summary of letters of support

- It is difficult for businesses to find premises.
- There is a shortage of high-quality logistics space in Stockport at every size range.
- The shortage of space has caused businesses to re-locate.
- Stockport is falling behind other locations which have prime logistics sites.
- There is a lack of affordable, good quality warehousing in Stockport.
- It will meet the needs of existing and future businesses.
- The development will deliver a world class destination for manufacturing, e-commerce and logistics.
- Will have knock on benefits for other businesses.
- It will allow business to move and expand.
- The site is a natural extension to the Bredbury Industrial Estate.
 - Bredbury Industrial Estate is always occupied close to full capacity and remains popular with occupiers on both a national and regional level.
- There are no alternative sites within the borough which could deliver the same volume of employment generating accommodation and meet the needs of occupiers.
- It will have a positive environmental impact due to commuter time and air pollution saved.
- The site is near to the motorway which will reduce lorry movements on local streets.
- If not built here it could be built where there is a worse impact.
- Industrial sites are needed to give jobs to the residents of new homes being built.
- Will be good for the area.
- Will bring further benefits for the whole area and contribute to Stockport's growth as one of the key employment centres.
- Would create jobs, prosperity and businesses in the area.
- New links for transport and pedestrians would be provided.
- Will bring a boost to the area and local economy.
- The local area needs more work to increase growth.
- A massive boost for the area.
- This is an opportunity to develop the area and financially help nearby towns.

- Will give Stockport a competitive advantage in the logistics and distribution sectors.
- Will reduce commute times and give a better quality of life.
- A vital investment for the borough which complements the regeneration of nearby Brinnington.
- The development will create over 2000 permanent jobs plus construction jobs.
- Has the potential to deliver a variety of jobs including high skilled roles.
- Will bring jobs to areas where firms have been lost.
- Infrastructure improvements will benefit local people – Sports Village parking, cycle links, footpath/bridleway.

Summary of letters of objection

Ecology/trees:

- Adverse effect on wildlife.
- There are deer on the land and surrounding the site.
- Will affect badgers during construction and operation.
- The biodiversity report states that the impact on badgers would be major adverse.
- The ES states there are 10 badger setts within 1km of the site.
- References to badgers have been redacted from the ES.
- Impact on Great Crested Newt – the ES records 3 instances within 700m of the site.
- Wildlife will be driven out of their habitat and the greenbelt.
- Loss of habitat, including low-moderate ecologically valuable habitats.
- Will upset the balance of the area which is protecting species/habitat in the greenbelt.
- Development will destroy the ambiance of Hulme Wood and Haughton Vale nature reserves.
- We regularly see wildlife and protected species in the Tame Valley.
- Impact on the River Tame and Tame Valley.
- Impact on protected sites close to the site – Haughton Dale Local Nature Reserve, Hulmes and Hardy Woods, Lower Haughton Meadows and the Peak Forest Canal.
- Impact on nesting birds.
- Impact on birds of prey, barn owls, falcon, hawk, bats, foxes, badger, insects and butterfly.
- I am concerned by the statement that there is no direct habitat connectively between the site and Hulmes and Hardy Woods and Lower Haughton Nature Reserve.
- Noise impacts on wildlife.
- Adverse impact of plastic litter and rubbish on the River Tame.
- The land is predominantly wetland.
- The surrounding hedgerows form an extensive network that links wildlife conservation areas.
- The fields are used for growing hay which provides ground nesting opportunities.
- The fields should be preserved to help prevent global warming.
- Risk of chemical or fuel spillage.
- The development will encroach onto the river edge.
- Adverse impact on climate change/global warming.
- Stockport Council has declared a climate emergency.
- Soil degradation.
- Loss of biodiversity and habitat.
- The intersecting road will kill animals crossing into Reddish Vale.

- The hay fields shelter mice and voles which are a food source for birds of prey.
- Adjacent to Botany Mill Wood SBI which would be harmed during construction and operation.
- Destruction of land, nature reserves and recreational space.
- Loss of green space.
- Damage to the nature reserve is irreversible.
- Pollution of the River Tame and the associated land.
- Potential impact on other rivers such as the Mersey.
- Detrimental to wildlife within Hulme's Wood nature reserve and the surrounding green areas.
- Impact on Botany Mill Site of Biological Importance.
- The wooded area around Denton and Bredbury border should be kept.
- The land should be protected.
- Loss of woodland.
- Loss of plant life and the impact on carbon dioxide levels.
- Impact of noise and disturbance on nearby nature reserves.
- Destruction of Reddish Vale Country Park.
- Loss of habitat leads to reduced pollinators which has an impact on commercial crop production.
- To claim that the project will increase biodiversity is ridiculous.
- It is going to decimate natural wildlife habitats and ruin green space.
- To build a green fence 3 miles from the proposed extension borders on farce.
- Seriously threatens biodiversity by encircling and degrading the nearby nature reserve and country parks.
- It is ridiculous to suggest there would be a net gain in biodiversity even if a hedge is erected at Reddish Vale Country Park, which is perfectly ok as it is.
- Impact of light pollution impact on wildlife.
- There is no reference to the noise impact on Haughton Dale Local Nature Reserve.
- The loss of hedgerows will be of moderate adverse significance.
- Neglect of the land and ponds.
- The planet should be preserved for future generations.
- The land currently acts as a barrier to pollution
- Micro plastic pollution will be generated from vehicle tyres.
- The Tame Valley will be affected by litter.
- Is attempting to gain planning permission by claiming to be beneficial to the environment.
- Additional hedgerows are welcome but not at the expense of green space.
- The issue is with green land being turned to concrete and traffic.
- There are a number of adverse and major impacts on arboriculture – the majority of tree features are likely to be adversely affected.
- The area has a lower than average tree population.
- Will reduce the amount of oxygen from trees and absorption of carbon dioxide.
- Contrary to Climate Change Act 2008.
- Would concrete 70% of the fields.
- We need to be finding ways of protecting the habitats of all our local wildlife.
- The continuity of the green corridor gives the area its character.
- The latest version once again destroys countryside and does not change the damage caused to wildlife and the environment.
- The proposed planting is not sufficient.

Landscape/visual impact:

- Will alter the openness of the valley.
- Loss of green space.
- Loss of visual amenity.
- Building in this lovely area would be a disaster.
- Areas like this should be conserved.
- People living closest to the development will have views obscured by huge sheds.
- Loss of views from Castle Hill Park.
- The site is currently a lovely, picturesque area.
- Turners Lane is a nice area to walk.
- The site is within the Tame Valley and Brinnington East Landscape Character Area.
- The application avoids mention of the Tame Valley.
- The design is not considerate of the area.
- 23m height is out of proportion and will detract from the area.
- The development is visually intrusive.
- Overdevelopment of the site.
- Adverse impact on the character of the area.
- Layout, design, appearance and landscaping are concerns
- Would dominate the area.
- Destruction of beautiful surroundings.
- Will be very detrimental to the local landscape.
- The buildings will be clearly visible from miles around.

Highway/traffic:

- Morning traffic is currently bad – it can take an hour to travel a 15 min journey.
- Traffic is can already be bad at 07:00 and backed up Ashton Road.
- The road network cannot cope with the extra traffic
- Stockport Road can become gridlocked.
- Will result in an increased heavy traffic flow between Denton and Bredbury.
- There has been an increase in the number of vehicles using Stockport Road over the years and the number of lorries which do not fit under the bridge to the M60.
- There is no reference to the low bridge over the M60 in the application.
- In the GMSF it is a condition of the allocation that the bridge must be raised.
- Network Rail say the bridge was hit 4 times in a year.
- The planning statement shows 1 in 3 lorries access the estate via Denton not Junction 25.
- There is no direct access off the M60 via the Woodley turn off for HGVs.
- Will result in increased traffic in Denton due to the low railway bridge.
- The M60 cannot cope with the volume of traffic.
- There will be additional delays at the M60 junction.
- The approach from Denton is not suitable for HGVs.
- Trucks will be forced up Stockport Road.
- Increased traffic, particularly Ashton Road, Stockport and Stockport Road during construction and once completed.
- Finance should be made available to alter the low bridge at Bredbury.
- Lorries are a major safety risk to school children and other pedestrians.
- Increased congestion and traffic jams.
- Impact on road users from Denton, Bredbury and Woodley.
- The junctions in Tameside have not been modelled.
- The ES has not appropriately assessed the traffic impacts.

- HGV's will have an adverse impact on the safety of the winding road from the railway bridge.
- There will be extra traffic around the sports centre.
- There is the potential for 2,000 HGVs travelling through Denton every month.
- The proposed highway works are not enough.
- Traffic should be reduced by encouraging cycling and investing in cycle paths.
- The narrow footpath on Arden Bridge is hazardous- more traffic will make this worse.
- There are not enough crossings for school children.
- 2,500 jobs means 2,500 extra cars.
- Delays and queuing traffic are already encountered by employees in Bredbury Industrial Estate, particularly at morning rush hour.
- Additional delays will be detrimental to businesses.
- The ES identifies some very significant impacts on the highway network- some are moderately adverse.
- A particular bottleneck exists where the A6017 Ashton Road passes underneath the Marple Railway Line.
- It is unclear as to how effectively the mitigation measures identified will deal with the impacts of significant additional traffic.
- The old bridge at the Arden Arms is unsuitable for the amount of traffic.
- Road safety concerns especially for schools connected to Stockport Road in Denton.
- Impact on the safety of pedestrians using Stockport Road.
- Access difficulties to the farmland.
- Traffic calming measures on Portwood roundabout are a failure.
- The A560 and A6017 roundabout is already dangerous.
- HGVs drive down small roads at high speeds causing a risk to pedestrians and other drivers.
- Residential roads will be used by HGVs during the day and night.
- Stockport Road has a high rate of road traffic accidents.
- The car park for the sports complex will worsen traffic and will not resolve issues for residents on Mill Lane caused by users of the complex.
- The additional traffic will cause road maintenance issues.
- Traffic would block ambulances.
- The developer should pay for a new access onto the motorway.
- Can HGV's be banned and goods brought in by rail?
- The site is close to the rail network but no links are provided. Trains have a greater capacity and less emissions.
- Road widening will make traffic worse.
- The development will create rat runs through residential areas.
- Adverse impact on cyclists due to increase in HGV's and air quality.
- PROW have been blocked in anticipation of this development.
- The surface used for the new footpath must accommodate all users
- Turner Lane is a designated quiet lane – impact on its character.
- The TA does not consider the impact on Denton on the low bridge to the A6017.
- Previous studies have concluded that no remedial work can be done to the bridge to alleviate the height constraint.
- Viridor/Suez waste vehicles, and Allied Bakeries vehicles have to travel through Denton because of the low bridge.

- Previous traffic surveys carried out by the Council have shown that HGV's use Stockport Road to access the industrial estate and it has been acknowledged that the bridge is an access issue HGV's.
- COVID-19 is leading to more people using cars instead of public transport.
- The car park for Sports Village has been reduced from 130 to 30 spaces.

Environmental Impacts:

- Will increase air pollution which is a health risk.
- Air quality is already poor in the area due to traffic and aircraft.
- Stockport Road already has high levels of nitrogen dioxide at rush hours.
- Increased dust emissions during construction, earthworks and trackout.
- Increased nitrogen dioxide. The ES states there would be a slight adverse impact in several locations.
- Will cause air pollution in Haughton Vale Woods.
- Haughton Green already has pollution from the cement works and recycling plant.
- Health impacts of pollution on humans and wildlife.
- Noise pollution and vibration
- Worsening traffic fumes.
- Lorries using Stockport Road speed, cause noise and vibration and have harmed the trees.
- Impact of noise during construction and operation, and from construction machinery/plant.
- Impact of noise from the service yards, which could exceed 50dB.
- Impact of traffic noise on sleep and mental health.
- The ES lists a number of minor adverse and moderate adverse noise impacts.
- 24 hours operation of the units.
- Impact of noise and air pollution from the sports village parking on local residents.
- Light pollution.
- Odour.
- The ES considers that dust emissions for the construction to be large.
- The plans do not show the use of the buildings close to Castle Hill Park- could result in noise pollution.
- Makes a mockery of Greater Manchester's clean air plan.
- Residents on Stockport Road cannot open windows because of the air pollution.
- Overwhelming increase in noise and air pollution.
- Castle Hill Park is affected by pollution from fires in the industrial estate.
- Noise from the associated restaurants and other facilities.
- Contrary to Manchester's clean air policies.
- Contrary to Climate Change Act 2008.
- Carbon dioxide pollution.
- Removal of excess earthworks over a prolonged period will add to negative CO2 footprint.
- Air pollution will impact on the health of school children and the elderly, many of whom have breathing problems.
- Our children do not want early death by pollution.
- Goes against the government's Clean Air Act.
- Air pollution has contributed to the death of a schoolgirl .

Flooding:

- Impact on the drainage system and flooding.

- There are existing drainage problems within the site.
- Bredbury roundabout already floods when it rains.
- Increase flood risk, surface water runoff, foul water runoff, fuel and chemical spillages – ranked as major adverse by the ES if not mitigated.
- The area provides natural water run-off.
- Increased risk of chemical and fuel spillage which if unmitigated are considered to be Major Adverse by the ES.
- Sports Village has already increased flooding.
- Flooding is a regular occurrence.
- Increased flooding due to loss of green land.

Residential amenity:

- Large buildings would be constructed within 17/20 yards of Castle Hill bungalows.
- Will bring misery to those who live in the area.
- Light pollution.
- Potential health problems for residents.
- Negative impact on local people.
- Noise, litter and anti-social behaviour from the proposed car park.
- Adverse impact on Castle Hill Park and Lowick Green.
- Noise, litter and odours.
- Proximity to Castle Hill Park will result in harm to amenity and privacy of residents.
- Insecurity for Castle Hill residents, increased crime putting elderly at risk.
- Impact on views.
- Will be an eyesore for local residents.
- The trees will provide no screening in winter
- The proposed 24 hour use will impact on residents.
- Negative impact on local communities and area.
- Would deliver a devastating impact on the lives of local residents.
- Impact of noise and disturbance from The Sports Village car park late in the evening.
- Castle Hill Park is a retirement park and is quiet and secluded.
- Increased vulnerability to crime in Castle Hill Park due to adjacent car park.
- The sports centre car park may be used by youths outside the opening hours of the centre.
- Will harm local residents for commercial gain.

Recreation:

- Residents of Tameside and Haughton green and visitors use the area for recreation, exercise and walking.
- Loss of a dog walking area.
- The loss of green space has health implications.
- The valley provides recreational space for residents who may not have the resources to travel further afield.
- Contradicts advice being given to walk more.
- The fields provide peaceful open space and should not be destroyed.
- Loss of green space will lead to additional pressure on other already crowded areas e.g. Peak District.
- Loss of green space could have a detrimental impact on health of residents.
- NHS advice is to exercise more – the loss of open space would impact on this.
- Impact on resident's quality of life.

- There is a lack of green spaces for children to play in.
- Loss of leisure amenities and a children's football pitch.
- There are few green areas left in Stockport.
- The area is part of the Trans Pennine trail.
- Loss of farmland and stables.
- The area is beneficial for peoples mental and physical health.
- People use the area to relax and teach children about wildlife.
- The land is important for the local community.
- The area is well used by Brinnington residents.
- Life expectancy in the area is low compared to other areas.
- To take away from the Tame Valley environment is at odds with the governments for people to exercise more particularly as being fitter and losing weight is effective in preventing Covid 19.
- Open spaces that provide therapeutic activity are now even more important.
- Land that needs development is left to deteriorate, while opportunities for accessing the countryside are diminishing.
- Negative impact on work life balance.
- The area is used daily by many people from the surrounding area, including walking clubs.
- In these times of Covid it is used by many people to exercise by walking in nature.
- Walking paths will be diverted or destroyed.
- Walking routes will be affected visually and potentially by smells.
- Fresh air helps to mitigate the dangers of COVID-19.

Need for the development:

- Will result in more empty units when incentives to move to the area stop.
- There are numerous vacant units in the industrial estate and surrounding area.
- Existing industrial estates in Denton have vacant properties advertised.
- In Wythenshawe and Southmoor Park there are many vacant warehouses with offices, yards and parking.
- Existing units should be redeveloped first.
- The latest planning data for Greater Manchester shows an oversupply of employment land.
- The promise of jobs has been overestimated.
- Most warehouses are highly mechanised.
- Most jobs will probably go to people from outside the area.
- The two new housing estates in Brinnington are occupied by professionals not likely to work in the industrial estate.
- SMBC Employment Land Review 2018 says there is a need for only 4.8 ha land for logistics and industry. This can be provided without building on the greenbelt.
- Of the 14 units built on Ashton Road over 12 months ago, only 7 are occupied
- Stockport has one of highest employment rates in the area.
- Need could be met by other sites in SE Manchester.
- There are enough commercial/industrial units in the area.
- There is other land available for use.
- The boundary of the industrial estate should not be encroached on.
- There is space for large industrial units at Ashton Moss/Snipe Pit.
- Ashton Moss has been removed from the greenbelt and has better road and rail access.
- The units could be built on more than one smaller site.

- Why has land next to Allied Bakeries not been considered.
- Stockport does not require additional land for B2/B8 uses.
- There is enough warehouse space in the M60 area.
- The development is not needed to enhance the economic prospects of the area.
- There is no guarantee that local people will be employed.
- No benefit for the community.
- Both the current pandemic and Brexit will likely reduce commercial demand for this type of facility.
- The type of units proposed will not accommodate displaced town centre businesses.
- There is no evidence of the need for large units.
- Quorum have failed to find any committed tenants for the site.
- The claims about Covid made by the applicant are speculative and not up to date.

Greenbelt/policy:

- There are no very special circumstances.
- Policy GBA1.2 details the presumption against development within the greenbelt - none of the exemptions listed apply in this case.
- Does not comply with Policy GBA1.7 (Major existing greenbelt sites).
- Contrary to NPPF greenbelt policy.
- The exceptional circumstances to overturn the greenbelt status have not been demonstrated.
- The land is protected greenbelt to protect against the spread of urbanisation.
- Will destroy the green heritage of the area forever.
- There are brownfield sites elsewhere in Manchester that should be used first.
- Cannot afford to lose any more green areas.
- Stockport and Tameside will merge.
- Forms part of the greenbelt strip running along Tame Valley – would reduce the width to less than half.
- Harm to the greenbelt outweighs any economic benefit.
- Loss of greenbelt land.
- The Greenbelt helps prevent urban sprawl.
- Loss of a large portion of the green belt and encroachment on the area that remains.
- There are brownfield sites nearby that could be developed.
- Contradicts Stockport MBC's policy of protecting the greenbelt, river valleys and natural environment.
- Once lost is gone forever.
- Greenbelt has already been lost in other areas.
- GMSF does not take windfall sites into account.
- Will reduce green belt running along the Tame Valley to less than half its current width.
- There are ample brown sites to use in Tameside.
- The use of greenfield land instead of brownfield is inefficient.
- Contradiction of Greater Manchester Planning policies: GM-G1: Valuing Important Landscapes, GM-G3: River Valleys and Waterways, GM-S6: Clean Air, GM-G11: The Greater Manchester Greenbelt.
- Contradiction of Stockport's planning policies.
- Counter to Stockport and Combined Authority policies for sustainable growth.

- GM Ecological Framework recommends protecting sites of nature conservation value and creating new wildlife habitats – complete opposite to this application.
- The GMSF review is not yet complete.
- Lack of regard to the GMSF consultation process.
- There has been considerable local objection to inclusion of the site in the GMSF.
- Does not accord with the GMSF allocation.
- The site is larger than the GMSF allocation.
- We have been promised by the Council that no more greenbelt land will be lost.
- The GMSF identifies too much land for commercial use across the region.
- The GMSF has been set aside by Stock port councillors – the application continues to claim the development is in line with the emerging plan.

Other concerns:

- No benefit for local residents.
- A more suitable site needs to be found.
- Denton and Haughton Green residents have not been properly consulted.
- The area has a lot of history.
- Responses to the public consultation have not been taken into account.
- Impact on demand for local properties and house prices.
- Horses that live in the area will need to be re-homed.
- Property damage from vibration from lorries.
- Difficult for residents to locate information if they do not have computer access.
- Will set a precedent for further development on green spaces.
- The decision should be based on the whole application not just 2 units.
- Adverse financial impact on Stockport and Greater Manchester residents.
- The proposal would leave nothing but a legacy of unnecessary industrial development capitalising on the industrialisation of precious little green areas.
- Does not help solve the housing crisis.
- I still oppose – my objections remain the same.
- Previous comments have not been taken into account.
- Compensation must be given for the impact on Tameside.
- The Council should represent residents views and not be pressured by business and financial incentives.
- Has there been a risk assessment to consider the environmental legacy, global and national changes and the welfare policies post Covid 19?
- I question why the original objections should not be upheld.
- The long-term needs of the community are not being taken in to account.
- The proposed development is inappropriate and detrimental to the site.
- The proposal is even worse than that which was rejected as part of the now defunct GMSF.
- The revisions do not address the core issues raised previously.
- Consultation with Councillors/MP's has not been carried out by the developer.
- Alternative bids for the site have not been called for, which goes against the 1947 Planning Act.
- Quorum should have put forward money for the re-assessment of the scheme.
- The impact on Tameside has not been acknowledged.
- Agricultural land should be retained to ensure food security.

Summary of neutral comments

- The road widening and junction enhancements should be a condition if the application is granted.
- The car parking of Life Leisure should be protected.
- Queries regarding the application boundary.

Andrew Gwynne MP

16.12.2020

I wish to record my strong objections to the revised planning application for the Bredbury Gateway industrial estate scheme in the Tame Valley, which was lodged with your authority on 14th December 2020.

This objection adds to my previous written objections of the 21st October 2019 and 24th February 2020 in respect of earlier iterations of this scheme. The following substantive points in those letters are still relevant so please take those comments jointly with the additional comments in this letter:

- Core Policy CS8 - Green Infrastructure
- Development Management Policy SIE-3
 - Protecting the Natural Environment: 3.345
 - Controlling Pollution: 3.348
- Development Management Policy T-1
 - Transport and Development: 3.476
 - Safety and Capacity on the Highway Network: 3.503
- UDP retained policy LCR1.1 Landscape Character Areas
- UDP retained policy LCR1.1a The Urban Fringe including the River Valleys
- UDP retained policy L1.5 Countryside Recreation
- UDP retained policy GBA1.1 Extent of the Green Belt
- UDP retained policy E1.2 Location of New Business Premises and Offices

I do however wish to add the following further material considerations to support my objection to this scheme:

HGV access:

In the new Traffic Impact Assessment, the applicant maintains that:

“there was no evidence that HGVs... have been unable to travel under the railway bridge”.

This is demonstrably untrue. I have been Member of Parliament for Denton and Reddish for over 15 years now, and I worked in the office of my predecessor, Andrew Bennett, for five years. In those two decades, I have dealt with this very issue on a number of occasions. I have held meetings with Tameside and Stockport Engineers, Highways England and Network Rail about the issue. All have acknowledged that the bridge is an access issue for high sided HGVs, which is why a substantial number of these vehicles access the motorway network at Denton. Indeed, early on in my first term as MP, Stockport Council lowered the A6017 carriageway, with the agreement of Network Rail, to the lowest point possible without it compromising the stability of the rail bridge. Whilst it provided a little more headway, it was still not enough for the highest-sided vehicles to fit under and so the problem remains.

In May 2018 Tameside Council was given permission by Stockport Council to conduct a traffic survey in Bredbury Industrial Estate to assess the scale of the problem. In an 18-hour period (6am-midnight), 510 HGVs used Stockport Road, Denton to access/exit from the industrial estate. Furthermore, during the final stages of the now defunct Greater Manchester Spatial Framework process, it was acknowledged by Stockport Council and the Greater Manchester Combined Authority that this (smaller than the current application) site-specific policy should not be brought forward before highways improvements were implemented to mitigate the impact on Tameside roads. That in itself is an acknowledgement that the development will cause an issue for my constituents without measures to create better HGV access at Bredbury.

Indeed Stockport Council and Transport for Greater Manchester also recognise the constraints at this bridge given the very substantial bid to Transport for the North - in the form of the Bredbury Economic Corridor improvement Package - and its inclusion within it. The developer's assertions clearly damage the Council's case for this bid. You cannot have the argument both ways!

Statement of Community Involvement - updated November 2020:

The developer maintains:

"Correspondence was issued to... [the] Members of Parliament for Hazel Grove and Denton & Reddish." This is not true. The first, and only, time I found out about this revised planning application was by an email to Stockport Councillors from Lexington Communications dated 14 December. A Councillor contacted me and kindly forwarded the email on to me knowing of my direct interest in this application. My understanding is that William Wragg MP was also not contacted about this revised application either, even though it sits physically within his constituency.

Planning Statement - Need and Alternative Sites:

The developer maintains there's both a need and no suitable alternative sites. I will challenge both these assertions in turn.

Firstly, on need. The developer maintains that businesses displaced from the redevelopment of Stockport Town Centre West (the Mayoral Development Corporation area) will need to be accommodated elsewhere within the borough. This may well be the case, although the MDC strategic framework and related documentation makes no reference to relocations specifically to Bredbury; rather it seeks to encourage and retain employment use within the MDC area. Also, the types of businesses within the MDC area do not require Amazon-style 'supersheds'. Indeed there isn't one business within the MDC area that has been identified by the developer as requiring a 'supershed' unit at Bredbury, or that couldn't (or wouldn't) be able to be accommodated in current vacant units elsewhere in Stockport - including on the existing Bredbury estate.

Stockport Council makes great play of the regeneration of the town centre. I support this wholeheartedly. The developer's assertion that their Bredbury scheme is required to enable this to happen is a false premise because the type of units they

are proposing does not reflect the need of the possibly displaced town centre businesses; the timeline for the MDC proposals and the Bredbury scheme do not match up; and fundamentally, if you require to develop Green Belt in order to 'regenerate' a town centre, that is not sustainable development or regeneration. It is removing amenity, biodiversity and is environmentally damaging.

In terms of the large logistics sheds, the developer makes a case that Stockport requires these types of units. There is no evidence for this. Indeed, much of the evidence for employment sites developed for the Greater Manchester Spatial Framework shows the demand for these types of unit was strongest along the M62 corridor. Indeed it is an inconvenient truth for the developer that there was already an oversupply of new employment sites within the now defunct GMSF, and there are better and more easily accessible sites than Bredbury. None of the developer's arguments for a logistics hub at this location warrant the removal of Green Belt protection from this site.

Secondly on alternative sites. The developer has sought to demonstrate the Ashton Moss strategic site is not a suitable alternative for this type of development. They are wrong. Whilst not in the borough of Stockport, it is close-by and serves a similar catchment on the eastern side of Greater Manchester. Ashton Moss was removed from the Green Belt, following the examination of the (then draft) Tameside Unitary Development Plan in the mid-1990s. Around half of the site has been developed, and enjoys much better road and direct motorway access than Bredbury. It also benefits from the Metrolink line to Ashton and Manchester running through the site. The rail line linking Stockport to Manchester Victoria also runs through the Ashton Moss site.

Ashton Moss West identified for large scale logistics-type developments in the GMSF (GMA 38) as part of the 'eastern gateway'. Given this site lost its Green Belt status more than 25 years ago, I feel very strongly that its completion as a Strategic Employment site should be prioritised over the removal of further Green Belt within the same catchment area.

Issues directly for Stockport Council:

- The emerging Local Plan

In their Planning Statement, the developer makes the assumption that, given the site's previous allocation in the draft Greater Manchester Spatial Framework, the allocation will be retained in the Stockport Local Plan which will now have to be produced at speed in order to fill the gap left by the defeated GMSF. There is no draft Local Plan for Stockport on deposit and there is no indication that, when there is, this site will be in it – or that such a site would survive the various consultation and examination stages of the plan process. This argument should therefore be completely discounted.

Indeed, the only planning policies currently relevant to Stockport are those contained within the Core Strategy, the retained UDP policies, and national planning guidance. They are the only local policies that this application can be judged against. The Bredbury application does not accord with either the Core Strategy or the retained UDP policies, and nor does it accord with national planning guidance.

Therefore there are very strong planning grounds to refuse this application.

- This site is larger than that proposed in GMSF

In arguing that the site was allocated in the now defunct GMSF (as GMA 31 in the Stockport section) as being a main justification to seek approval for their application, the developer ignores two inconvenient truths:

Firstly, GMSF was defeated by Stockport Council because of concern over the loss of Green Belt within the borough. The inclusion of this site-specific policy was part of the reason for that defeat.

Secondly, the new planning application would not accord with the GMSF allocation in any case. The site-specific policy was, of course, amended considerably to try and balance the impact on the Tame Valley. As you know, the proposed area for development was moved right up the valley to the top of the hillside and away from the river. This application brings the units back down towards the Tame. This is unacceptable and would be against the GMSF policy were that an actual 'emerging' policy that the committee could judge the application against.

- An acknowledgement of the importance of the river valley

In making the amendment to GMSF policy GMA 31 there was an overt acknowledgement by Stockport Council of the continued importance of the Tame river valley and its environmental, recreational and biodiversity value to both Stockport and Tameside. The justification for moving the area identified as being suitable for development away from the river, was to:

- Include the creation of a retained Green Belt buffer zone that will manage the transition, minimise the impact on the Tame Valley and safeguard views creating strong defensible boundaries at the edge of the developable area and the new Green Belt boundary;

- Contribute to the area's special landscape qualities and key sensitivities in line with Policy GM-G 1 'Valuing Important Landscapes'. Development should restore positive landscape characteristics and features that reinforce scenic quality and distinctiveness particularly of the Tame Valley;

- Protect and enhance biodiversity interests, securing opportunities to achieve biodiversity net gains in line with Policy GM-G 9 'A Net Enhancement of Biodiversity and Geodiversity'; both within Stockport and neighbouring areas;

- Be designed to minimise any adverse impacts on the remaining Green Belt, including a comprehensive and high quality landscaping scheme (minimising tree loss and mitigating for any unavoidable loss of trees with significant levels of mature tree planting), provision of a wildlife corridor linking land to the north and east of the site with the existing wildlife corridor at the southern boundary and a detailed scheme for external illumination at the site which shows how light pollution will be controlled.

While GMSF was defeated, all these things remain valid, and were acknowledged of being of such importance by Stockport Council as recently as October 2020 to warrant a change in the policy. This application seeks to undermine those sound policy aims. Indeed, worse, the developer seeks to minimise the importance of this site within the Tame Valley by saying it is not part of a continuous section of Green Belt.

That is utterly false: the Bredbury site is continuous Green Belt with the Hulme's and Hardy Woods, Lower Haughton Meadows and Haughton Dale Local Nature Reserves. The openness of Bredbury is of key value and importance to this part of the Tame Valley and these comments merely highlight the developer's lack of appreciation of the shared nature of the Tame Valley on Stockport and Tameside.

Tameside Council's view:

I also note that Tameside Council has formally written to you, and to the Secretary of State for Housing, Communities and Local Government on the 15th December 2020 in the strongest of terms, outlining their objections as the neighbouring authority.

Their views should be given considerable weight given the Tame Valley is a shared natural asset for both boroughs, and that much of the negative impact from the development will affect Denton in Tameside.

I wholeheartedly share Tameside Council's concerns over:

- Need
- Green Belt
- The Environment
- The River Valleys
- Air Quality

And indeed I have made these particular arguments in detail in my earlier objection letters of 21 October 2019 and 24 February 2020, which this correspondence adds to.

Conclusion:

Finally, I wish to reassert my view that this application must be rejected in its entirety by Stockport's planning committee.

It does not meet either Stockport's current planning policies contained within the retained Unitary Development Plan or Core Strategy, nor does it satisfy the Government's national policies in relation to sustainable development or protection of the green belt.

It fails the local authority's environmental policies, transportation policy and the emerging Clean Air plan for Greater Manchester (of which Stockport is a member). The need for new giant logistics sheds in Stockport has not been made. Indeed, there are better sites for this type of development in Greater Manchester.

It would completely destroy the openness, ambience and coherence of the Tame river valley at this location, and so, in my opinion, there are no 'exceptional circumstances' in which to grant permission for the release of green belt at this important buffer between Stockport and Tameside. The application should be refused.

Out of courtesy I am also letting you know that I am also copying this letter to the Rt Hon Robert Jenrick MP as Secretary of State because I agree with Tameside Council that, should Stockport Council be minded to approve this application, the scheme should be called-in and determined by him.

26.02.2020

I wish to record my strong objections to Part A (outline) and Part B (full) of the amended planning application DC/074399.

I submitted detailed objections to the outline planning application in October 2019. These comments remain relevant to this application and I want them to be considered alongside the additional comments I make here. I have enclosed a copy of my original letter for ease of reference.

This application to extend Bredbury Parkway industrial estate into the greenbelt of the Tame Valley runs against Stockport's own planning policies and quite simply cannot be justified. The development would have a hugely damaging impact on large swathes of the Tame Valley. The two new industrial units will take green space adjoining Haughton Dale and Hulme's Wood Local nature reserves, negatively impacting on air quality, causing noise nuisance and damaging the River Valley. There will be a consequential increase in traffic on Ashton Road in Stockport and Stockport Road in Denton - and this will have a particular impact in Denton as a result of the low bridge.

The two units proposed in this application can't be considered in isolation. They represent just the start of an incremental loss of amenity and the decision needs to be based on the overall outline proposal.

The application runs against the policies in the council's own local plan for all the reasons I stated in my original objection and it doesn't meet with the aims and objectives of the GMSF, as I have stated in my submission to them.

Nor would it meet the aims and objectives of the Tameside Unitary Development Plan and given that it has a substantial impact on residents in Tameside they feel, and I speak for the voiceless in this process, that were this development a few metres in the other direction there would be sound grounds to turn it down, as there as there are in Stockport's Local Plan.

Finally, on the sequential test there is ample employment land available across Greater Manchester to accommodate this use without the need to encroach onto the green belt in the Tame Valley, nor least, as per Tameside council's submission to the earlier outline planning application, substantial land at Ashton Moss.

I wish to reassert my view that this application must be rejected in its entirety. It does not meet Stockport's own planning policies particularly in relation to green belt and River valleys and there are no exceptional circumstances to release this land and grant the application.

22.10.2019

The above planning application is quite simply get hold in Stockport MBC's own planning policies. specifically these include UDP retained policies on protecting the green belt and river valleys, Core Strategy Policies on whether new employment land is required and finally the developers assertion in making an 'exceptional circumstances' case to release green belt land at Bredbury.

In an earlier consultation on the revised version of the Greater Manchester Spatial framework, I strongly opposed the proposal to extend the Bredbury Parkway industrial estate deep into the green belt at the Tame Valley, which is right on the boundary of my constituency. I am frankly dismayed the Stockport council had pursued this application.

This proposal would effectively take the industrial estate right up to the Stockport boundary - a very narrow section of the River tame. This will completely destroy the openness and tranquilly of the Hulmes Wood and Horton Dale local nature reserves over the River in Denton . There, therefore, is no justifiable reason to lose green belt land at this precious location. To do so it will be nothing short of environmental vandalism.

The proposal will also exacerbate the already poor air quality in the area and increase HGV usage along an already congested Stockport Road, as many commercial vehicles currently have to access the motorway network at the M67 north of Crown Point because of the inaccessibility of the M60 at Bredbury owing to the low railway bridges.

I will now move on to this specific policy areas.

Environmental considerations:

Core policy CS8: Safeguarding and improving the environment:

Green Infrastructure (GI)

"3.286 The council working with local communities, developers and partners, will protect, develop and enhance an integrated network of high quality and multi-functional GI that will:

Improve health and well being;

Improve and enhance cross boundary connectivity and accessibility through the delivery of joint development proposals including specifically the River Valleys;

Protect and connect existing and potential sites of nature conservation value and historic landscape features, and seek to create new wildlife habitats as recommended in the GM Ecological Framework (see www.stockport.gov.uk/ldfevidence);

Protect and provide appropriate natural space to connect landscapes and allow wildlife to move through them to adapt to climate change"

The significance of GI in the case of this planning application is further referred to in the Glossary of the Policy.

Quite simply the proposal fails the GI policy test. It will effectively join the built up areas of Stockport and Tameside, Bredbury and Denton with only a narrow green buffer on the Tameside side of the River Tame; it will destroy the openness Haughton Dale and Hulmes Wood local nature reserves.

The development will very tightly constrain the openness of the valley at such a sensitive location (bordering two local nature reserves just over the river); it will decimate the mosaic of semi natural habitats on the Stockport side of the river; the tranquilly and seclusion of the Horton Dale and Holmes Wood local nature reserves will be completely destroyed by noise from traffic and industrial process is coming from the units; the perception of openness only comes from the Stockport side of the river.

As per the policy the proposal will not make a *“positive contribution to the protection an enhancement of the borough's natural environment, biodiversity or geodiversity”*.

Furthermore the Tame Valley which *“offers an ecological, biological, geological and other environmental benefits”* is not being safeguarded and is therefore in direct contravention of 3.296 in the Core Policy.

The Bredbury Parkway proposal is therefore completely in conflict with the core policy on green infrastructure.

Development Management Policy SIE-3

A) Protecting the Natural Environment 3.345

The policy states:

“The borough's varying urban and rural landscapes, biodiversity, geodiversity and soils combined to create a unique and distinctive local character considerable value to residents and visitors alike. This locally distinctive sense of place and character will be maintained and enhanced as follows:

The Borough's urban and rural landscape will be conserved and enhanced in line with the borough's Landscape Character Assessment. The current preliminary assessment detailed in the Stockport UDP review will be reviewed so as to inform the Allocations DPD and the future consideration of development proposals. This will ensure that the landscape as a whole can be managed, protected and enhanced; net loss of biodiversity and geodiversity will be prevented by applying a hierarchical approach to conserving and enhancing the network of nationally, regionally and locally designated sites and habitats; Applications for developments that would result in harm to the borough's biodiversity and geological conservation interests will be determined in accordance with the key principles set out in PPS 9 (Biodiversity and Geological Conservation) and in particular sub-paragraph 1(vi); and Opportunities And locations for biodiversity enhancements will be identified and pursued by the creation, protection, enhancement, extension and management of green corridors

through the development of green infrastructure networks in urban and rural areas to improve connectivity between habitats.”

This planning application fails this policy test at every point, the landscape will not be managed, protected and enhanced, quite the opposite and furthermore this proposal symbolises the destruction, neglect, reduction and contraction of green corridors.

The provisions in the new Core Strategy further underpin and strengthen a number of the UDP retained policies which are described below:

UDP Retained Policies:

LCR1.1 Landscape Character Areas

Development in the countryside will be strictly controlled, and will not be permitted unless it protects or enhances the quality and character of the rural areas. Where it is acceptable in principle, development should:

- (i) be sensitively sited, designed and constructed of materials appropriate to the landscape character in which it is located; and*
- (ii) be accommodated without adverse effect on the landscape quality of the particular character area.*

Development proposals in the countryside should meet the following requirements, where relevant:

- (iii) protect or improve existing recreational land, so as to maintain or enhance the predominantly informal recreational role of the countryside around Stockport;*
- (iv) not impede, and where possible, improve public access for all to the countryside;*
- (v) protect or enhance the natural environment in accordance with policies in chapter 3.*

This planning application does not comply with any of these protections and in fact seeks to destroy them further.

River Valleys:

UDP Retained Policies:

LCR1.1a The Urban Fringe including the River Valleys:

Access to the urban fringe including the River valleys, for all people including those with disabilities and using all travel modes, should be enhanced. Riverside and other long distance walking routes, and access for water users should be protected and completed.

The proposal has no regard for the topography of the site. The land dips down sharply from the top of the Hill at the Kingsmill Bakery on Ashton Road Bredbury down towards the River Tame. The proposed development would therefore be

located in the V of the valley, and the unit would have a terracing impact from the opposite side of the river.

It's clear from the artists image that there won't be a high quality frontage to the water - quite the opposite: the image shows HGV's backing immediately onto the riverbank.

L1.5 Countryside Recreation:

Recreation development will only be permitted where it would not spoil the enjoyment of the river valleys or the wider countryside through the introduction of noise, excessive traffic or other intrusive features.

Explanation: 8.50 there is a continuing need to safeguard the borough's countryside for quiet informal recreation and to protect the rural environment from intrusive development and activities. Built development will not normally be appropriate in the river valleys.

GBA1.1 Extent of the Green Belt

The Bredbury Gateway application and it being the area associated to the Tame Valley falls outside the provisions made in the above policy and therefore the below statement within this policy applies:

Forms of development other than new buildings, including changes in the use of land, will not be permitted unless they maintain openness and do not conflict with the purposes of including land in the green belt.

Policy L1.5 and GBA 1.1 therefore only seek to emphasise as to why the Bredbury Parkway planning application further contradicts Stockport MBC's own policies.

Air quality and pollution:

Development Management Policy SIE-3

Controlling Pollution 3.348

“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.”

The immediate roads that Ashton Road, Bredbury and Crookiley Way, Stockport, are far in excess of safe air quality levels. In addition, the same is true of Crown Point, the A57 Manchester Road and Denton roundabout. The proposed development will add HGV and motor car usage on all of these roads, potentially exacerbating not improving on the unsafe air quality at these locations.

In addition, the Greater Manchester air quality plan excludes the huge amounts of air pollution caused by traffic on the M60 and M67 motorway at the same locations. Such a large-scale development will undoubtedly be 'reliant on forms of traffic that generate air pollution' and fail to 'maximise the use of sustainable travel modes' as a consequence. The proposed application is therefore in conflict with policy 3.348 on clean air.

Development Management Policy T-1

Transport and Development: 3.476

"To facilitate a reduction in the need to travel, development will be focused in the town centre in particular and also other existing centres, as these locations are the most accessible and already contain a wide provision of services and amenities."

Development Management Policy T-3

Safety and Capacity on the Highway Network: 3.503

"Safety for all road users is of prime importance. The capacity of the existing road network is limited, and it is therefore important that new development does not have a detrimental impact on capacity of the highway network."

This is clearly not a town centre proposal and the area certainly does not contain a wide provision of services or amenities. The proposal is not in the interest of the safety of current or future road users and the existing capacity of the highway network is already at its maximum.

In addition to the abovementioned concerns I have relating to air quality, I have separate but related concerns about the potential traffic impact on the immediate area more generally.

Firstly, Ashton Road in Bredbury is already locked at peak times of day. Worse, because of the low railway bridge is at Ashton Road and Lingard Lane, many of the largest HGV's are unable to access the M60 motorway network at Bredbury and instead, travel via Stockport Road, Denton, through Crown Point, to access the motorway network at either J1A of the M67 (westbound) or J2 of the M67 (eastbound).

This additional heavy traffic on Stockport Road is a constant cause for complaints by my constituents, to the extent that, in May 2018, Tameside Council conducted a traffic survey with the agreement of Stockport MBC on the Bredbury Industrial Estate, to ascertain the scale of the problem.

Monitoring equipment was located at all the in and out points to the industrial estate and it was ascertained that, on 23rd of May 2018, in an 18 hour period (6am 12 midnight) a total of 510 HGVs used Stockport Road, Denton, in order to access or exit the Bredbury Industrial Estate.

The split is TO Denton: 251 HGV's FROM Denton 259 HGV's

(source: Tameside MBC Highways)

It is therefore clear that the existing industrial estate is causing significant traffic problems in the neighbouring area of Denton, and this will almost certainly worsen should the park extension happen.

Reference is also made to the site-specific policy justification of the need for additional infrastructure upgrades to the roads, including addressing the low railway bridge is. The trouble is, this is largely unfeasible.

I met with officers from Highways England, Network Rail, Stockport and Tameside Councils on 18th January 2018 in order to discuss this very issue. The long and short is that it will be extremely expensive to resolve. The options are:

- 1) Lower Ashton Road under the railway bridge to allow for maximum HGV height - unfeasible. The road has already been lowered at this location and to do so further would make the bridge unstable/require the bridge to be rebuilt.
- 2) Raise the railway bridge - unfeasible. The line is very busy with freight, local and east-west passenger services. The estimated cost for raising the bridge, according to Network Rail, would be around £5 million. Not included in that cost would also be additional compensatory payments made to the various train operating companies, and rail replacement service costs, owing to line closures for a sustained period.
- 3) A road 'flyover' the railway line - unfeasible due to cost and wider site constraints around the railway line.

In addition, I met with Quorum, the agents for a potential end-user on the proposed Bredbury Parkway extension site, on 6th July 2018. I outlined the options above to them and they told me such works would potentially make the development of the site financially unviable.

It is therefore clear to me that the infrastructure costs involved in order to alleviate the traffic impact on neighbouring Denton, is not remotely viable and so this development - should it proceed - will be bad-neighbourly to the communities I represent.

3.3.5 Accommodating Economic Development:

Of course if a planning application is to even be considered whilst contradicting so many of the Local Planning Authority's policies it is of course important to consider the economic factors. The above policy is as follows:

"3.243 Whilst there is forecast to be a significant fall in the overall level of B2 (Heavy Industry) uses there will still be the need for such sites in the future and these will be directed to existing employment areas. However with the net loss of B2 floorspace there will be a requirement for more B8 (Warehousing) floorspace. Given that there is significant overlap in the needs of such uses it is expected that warehousing uses will replace those B2 uses lost from employment areas, resulting in no net

requirement for new employment land.”

Not only does this application contradict important environmental and social policies Stockport MBC's own economic strategy clearly states there no net requirement for new employment land rendering this application redundant and unnecessary.

UDP retained policies

E1.2 Location of New Business Premises and Offices

Even if it had not been identified that no new net employment land is required the above policy would apply which certainly would be the case:

12.13 However, the Council is of the opinion that additional land release should not be at the expense of the Green Belt or other open land policies and this allocation can be meet the requirements of local and incoming industry.

Finally, the Greater Manchester Combined Authority conducted a thorough study for a large strategic site capable of hosting a Manchester Bid for World EXPO in 2025.

That assessment showed the only available site without greenbelt constraint within the Greater Manchester area was Ashton Moss. That site still available, and it is my understanding that now an EXPO bid isn't being put forward, Tameside Council would like to bring it forward for employment.

Ashton Moss was removed from the Greater Manchester Greenbelt in the Inspector's Report into the 1996 Draft Tameside UDP, as adopted in 1998. The site was released for regional strategic employment site, and a large part of the previous Greenbelt land which lies to the North of Lord Sheldon Way, still remains undeveloped.

Therefore, the developer's assertion in making an 'exceptional circumstances' case to release greenbelt land at Bredbury for this application, because there aren't any suitable sites in either Stockport or Tameside, is factually incorrect.

GMSF Considerations:

As we are midway through the GMSF consultation where the site hasn't yet been approved for Greenbelt release, and in addition to the above existing planning policies relating to the site. Below is a reiteration of my GMSF objection based on the emerging policies in the Spatial Plan:

1) This allocation is completely unnecessary in a Greater Manchester context. The GMSF identifies too much land for future commercial use across the conurbation, way above the projected need or demand for sites. There, therefore, is no justifiable reason to lose Greenbelt land at this precious location. To do so will be nothing short of environmental vandalism.

2) Worse, this proposal would effectively take the industrial estate right up to the

Stockport boundary - very narrow section of the River Tame. This will completely destroy the openness and tranquillity of the Hulmes Wood and Haughton Dale Local Nature Reserves over the river in Denton.

3) The proposal will also exacerbate the already poor air quality in the area and increase HGV usage along an already congested Stockport Road, as many commercial vehicles currently must access the motorway network at the M67 north Crown Point because of the inaccessibility of the M60 at Bredbury owing to the low railway bridges.

The proposal does not accord with the defined environmental policies contained within the Greater Manchester Spatial Framework:

GM-G1: Valuing Important Landscapes:

"Development should reflect and respond to the... sensitivities of the key landscape characteristics of its location, including having regard to: - Topography - Views and perceptual qualities"

The same policy goes on to say, "Transitional areas around new development and the interface of the new development to the surrounding countryside/landscape are also of particular importance, requiring well-considered and sensitive treatment."

GM-G3: River Valleys and Waterways:

"River valleys and waterways will be protected and improved central components of Greater Manchester's green infrastructure network... Greater Manchester's authorities will seek to deliver the following priorities:

1. Retain the remaining open character of the river valleys, avoiding their fragmentation and prominent development on valley edges.

3. Protect and enhance the mosaic of semi-natural habitats...

4. Retain pockets of tranquillity and seclusion, especially within the more tightly enclosed wooded valleys

9. Ensure that development relates positively to nearby rivers.. through: a. High quality frontages to the water".

It's abundantly clear that this site-specific policy fails the above points GM-G3. The development will very tightly constrain the openness of the valley at such a sensitive location (bordering two Local Nature Reserves just over the river); will decimate the mosaic of semi-natural habitats on the Stockport side of the river, the tranquillity and seclusion of the Haughton Dale and Hulmes Wood Local Nature reserves will be completely destroyed by noise from traffic and industrial processes coming from the units; the Tameside-side of the river fits the description of a tightly enclosed wooded valley'-the perception of openness only comes from the Stockport side of the river.

Finally, it's clear from the artist's image that there won't be high-quality frontage to

the water.

GM-G11: The Greater Manchester Greenbelt:

"The Greater Manchester Greenbelt will continue to be managed to serve the... purposes set out in national policy:

To check the unrestricted sprawl of large built-up areas -To prevent neighbouring towns merging into one another -To assist in safeguarding the countryside from encroachment."

The policy goes on to state: "Positive and beneficial use of the Greenbelt will be supported where this can be achieved without harm to its openness..."

It is abundantly clear that this site-specific policy fails on all these tests. I believe that the Bredbury Parkway proposal is therefore completely in conflict with policy GM-G11 on Greenbelt.

GM-S6: Clean Air:

"A comprehensive range of measures will be taken to support improvements in air quality, focusing particularly on areas... where air quality targets are not being met, including:

1. Locating and designing development... so as to reduce reliance on forms of traffic that generate air pollution.

...Development should be located in areas that maximise the use of sustainable travel modes and be designed to minimise exposure to high levels of air pollution."

Need: There is an oversupply of commercial land identified across Greater Manchester. Therefore, in the city-region context, it is not required, and the loss of Greenbelt cannot be justified.

Environment: The site allocation fails to comply with GMSF policies on the River Valleys, Greenbelt and on Clean Air. The allocation will destroy the openness and ambience of the Tame Valley at this sensitive and special location, adjacent to the Haughton Dale and Hulmes Wood Local Nature Reserves.

Traffic: The site will generate an excessive amount of additional traffic that will be forced to use the local road network in Denton in order to access the Motorway network. This is unacceptable. It is also clear that any infrastructure engineering works capable of removing the need to drive through Denton will be cost-prohibitive.

Planning Application DC/074399 Bredbury Gateway must therefore be rejected in its entirety on the basis of it being in contravention of Stockport's own planning policies particularly related to the green belt and river valleys, it ignoring the assessment that no further net employment land is required, and the false assertion there 'exceptional circumstances' to grant this application.

William Wragg MP

March 2020

I am writing in my capacity as the Member of Parliament for the Hazel Grove constituency to outline my strong objections to the above application DC/074399 in its entirety; both parts A and B of the application.

In October 2019 I, along with hundreds of concerned residents, submitted strong letters of objection to the previously proposed scheme. As DC/074399 remains broadly the same application, I have attached to this letter a copy of my original objection submission for your reference.

I again would like to reiterate the strong levels of opposition to this scheme from residents. They have made strong representations to me as their constituency Member of Parliament. I also draw attention to the huge support for a petition I presented to the House of Commons in October 2018, alongside my constituency neighbour, Andrew Gwynne MP.

The principles of my objection remain the same. I object on the grounds that;

- This is building on protected green belt land.
- The increased congestion and pollution on local roads.
- The environmental damage this application would cause.

The application contradicts the process of the Greater Manchester Spatial Framework (GMSF) and therefore also represents a departure from the Council's own Local Plan.

The impact this application will have on the quality of life for my constituents is stark. This will include increased traffic and congestion, both during and after construction, the loss of local much used green belt land in the Tame Valley, and the environmental impact this would have on the surrounding area.

In line with my previous submission, the application cannot be seen in isolation. If granted, the scheme would threaten surrounding green belt land and would encourage further speculative applications, representing even greater incursions into local green belt and open spaces.

I therefore wish to put on record again my strong objection to this scheme. As outlined in my original submission, granting this application would not only have a negative impact on the environment and the quality of life of the people I represent, but would also make a mockery of Stockport Council's own planning processes. This is because it contradicts the objectives of the ratified Local Plan, the aims of the proposed Spatial Framework and also the views of the 1,500 people who signed the petition against the scheme.

Should the council seek to grant permission to this scheme, I will make representations to the Secretary of State for the Ministry of Housing, Communities and Local Government and ask him to call-in the application under the provisions set out in the Town and Country Planning Act 1990.

Thank you for your consideration.

22.10.2019

I am writing in my capacity as Member of Parliament for the Hazel Grove Constituency, and in light of representations made to me by my constituents to formally object to the proposed Bredbury Gateway.

I would also remind the Council that almost exactly one year ago, 23rd October 2018, I and neighbouring Denton and Reddish MP, Andrew Gwynne, presented a petition to the House of Commons outlining both constituencies opposition to the massive extension of Bredbury Parkway industrial estate. This attracted a great deal of support with over 1,500 members of the public pledging their opposition to the proposal.

I wish to object on the following main grounds:

This is protected Green Belt land which should not be built on

Local roads cannot handle the increase in traffic

Potential environmental harm

This ignores the GMSF process

Green Belt Protection

The proposals to extend the Bredbury Parkway Industrial Estate deep into the Tame Valley would involve large-scale development on the Green Belt land, which is a valuable barrier to urban sprawl and is hugely valued by local people, particularly in the areas of Bredbury, Woodley, Denton and Haughton Green.

Stockport MBC's own policy (GBA1.2 - Control of Development in Green Belt) details the presumption against the construction of new buildings in the Green Belt unless it is for the following purposes:

- i. Agriculture and forestry,
- ii. Essential facilities for outdoor sport and outdoor recreation, for cemeteries, or other uses of land which preserve the openness of the Green Belt and which do not conflict with the purposes of including land in it,
- iii. Limited extension, alteration or replacement of existing dwellings,
- iv. Limited Infilling or redevelopment of Major Existing Developed Sites.

None of the above exemptions qualify in this instance.

Stockport MBC's policy (GBA1.7 - Major Existing Developed Sites in Green Belt) details the possibility of a complete or partial redevelopment being permitted providing it would:

- i) Result in environmental improvement
- ii) Have no greater impact than the existing development on the openness of the Green Belt
- iii) Contribute to the achievement objectives for the of land in Green Belt
- iv) Not result in the loss of Listed Buildings or other buildings or features of visual amenity, ecological, environmental or archaeological importance.

Considering that this proposal is a totally new development - and not a complete or partial redevelopment - it is deeply concerning that none of these considerations are met.

The proposal at Bredbury is also in direct contradiction to sections of the National Planning Policy Framework: 'Positive and beneficial use Green Belt will supported where this can be achieved without harm to its openness.' This proposal, in contrast, would destroy the openness of this section of the Tame Valley and damage the visual amenity from the Haughton Dale and Hulme's Wood Local Nature Reserves.

I know that people in Bredbury and Woodley greatly value their local Green Belt land, as do residents across Stockport. It is clear that people value their countryside and want it protected and that massive development in the Green Belt is not welcome.

I am also deeply concerned that this section of the Tame Valley would be redeveloped when many industrial units on the existing site are vacant. It is vital that we protect Green Belt land across the valley and ensure that all possible previously developed sites are brought back into use. The Council must listen to this and adopt a brownfield first strategy ahead of releasing Green Belt land for this development.

Traffic Considerations

Whilst it is acknowledged that the proposal includes modifications to five junctions in the immediate vicinity of the proposed site, it fails to take into account the wider impact on the local road network.

I am deeply concerned that no attention has been paid to the impact the development could have on traffic in both Bredbury and Denton. There is great concern from local people over HGV traffic in the area and the impact that the proposals would have on an already congested Stockport Road (Denton) and Ashton Road (Bredbury). Local roads cannot cope as it is, with traffic through Bredbury is at a near standstill already for well over an hour each side of peak times.

Stockport Road in Denton has become blighted by HGV traffic accessing and exiting the industrial estate as it is. It shouldn't be, because junction 25 of the M60 directly serves Bredbury - However the low railway bridge means that the many high sided vehicles can't get under and so they have to divert through Denton to get to the motorway at Crown point. No reference has been made in Chapter D - Highways of the low bridge on Ashton Rd preventing HGVs from accessing the M60 in Stockport.

Tameside council (with the agreement of Stockport council has monitored HGV vehicle movements from and to the Bredbury industrial estate) and the study shows that in a 13 hour period, around 500 HGVs use Stockport Road. Any increase to this already heavy traffic burden would be completely unacceptable.

I am furthermore very concerned that junctions have not been modelled and that the Highways relevant section of the application have not appropriately assessed the impact of traffic relative to this scheme.

Extra traffic will not only lead to increased congestion, but also the associated effects

on the environment, particularly with regard to air quality, and nitrogen dioxide emissions from slow understanding traffic.

Environmental Concerns

In addition to concerns of air quality caused by traffic increases there will be a range of other harmful environmental impacts both during construction of the site, and ongoing operation phases.

During construction air quality will be impacted by dust emissions from construction and earthworks. There will also be an adverse effect of noise during construction relating to road works, landscaping, site preparation, building foundation works and building construction, and from the operation construction vehicles, plant and machinery.

Local wildlife and biodiversity could be adversely affected as there are a number of protected sites close to the proposed site, notably Horton Dale local nature reserve, Hulmes and Hardy Woods, Lower Horton Meadows and the Peak Forest Canal.

Planning Process Considerations, and related GMSF process

The Draft Greater Manchester Spatial Framework (GMSF) was consulted on last year, and I, along with the Council and fellow MPs made strong representations about the number and location of sites that were proposed on Green Belt land. Furthermore, many tens of thousands of local residents from across Greater Manchester signed petitions, and submitted consultation responses relating to various aspects of the GMSF.

The Bredbury Parkway industrial estate proposal comes as merely the latest episode in the long running public backlash against the GMSF proposals, which include several major planning developments on large swaths of Green Belt land across Greater Manchester, and many thousands of people signed various petitions and attended rallies, marches, and demonstrations across the region.

Following the outcry from both the public and politicians the Greater Manchester Combined Authority was sent back to the drawing board to re-draft the Framework, and a revised version expected to be published soon for further public consultation.

For this particular proposal to be brought forward speculatively at this time, and in parallel to the GMSF process, makes a mockery of the due process. Whatever one's view on the GMSF whole, (and I have a long record of speaking out on various aspects of the GMSF over several years, which are all a matter of public record) is right that the process should be respected.

In contrast this proposal seeks to directly undermine that process. It also undermines the time, energy and great amount of public resources that have gone into the GMSF, from both Stockport Council, the Combined Authority, and other constituent Councils of Greater Manchester. Therefore, it is an insult to those who have contributed to the GMSF process so far, including the many thousands of local residents and constituents. On that basis alone, it ought to be rejected.

Conclusion

In conclusion, I urge that this application is rejected.

I also hereby give notice to Stockport Council, and the public, that I will consider appealing to the Secretary of State for Housing, Communities and Local Government, to request that he call-in the application under section 77 of the Town and Country Planning Act 1990, should it become apparent that the Council is minded to grant the application.

Denton South Councillors (Cllrs Claire Reid, Jack Naylor and George Newton)

05 January 2021

Once again, the Denton South Councillors are writing to object to the above planning application. It is disappointing that that subsequent applications continue to be submitted by the developer – particularly over the festive period – in a bid to confuse local residents and find a path of least resistance.

Further to our previous objections, we wish to formally object to this application for the following reasons:

1. Contravention of regional and local planning policies

a. The proposal would contravene Core Policy CS8: Safeguarding and Improving the Environment: Green Infrastructure (GI). The development would destroy the openness and beauty of the Haughton Dale and Hulmes wood Local Nature Reserves in Denton South by effectively joining up the settlements of Denton and Bredbury. The development would make no positive contribution to the enhancement of the natural environment, biodiversity and geodiversity in the local area, another example of how this policy would be contravened.

b. The proposal would contravene Development Management Policy SIE-3: Protecting the Natural Environment 3.345.

This policy highlights the value of the local area's rural landscapes, biodiversity, geodiversity and soils, yet the proposal shows no regard for protecting any of these valuable local assets – indeed, the proposal would actively destroy these precious green assets.

c. The proposal would contravene Development Management Policy T-3: Safety and Capacity on the Highway Network: 3.503. We cannot stress enough how this policy would be contravened. Bredbury notoriously suffers from heavy congestion, not only during peak times. This development would put greater strain on the road network in that area, having an even greater knock-on effect on the road network in Denton South. Furthermore, I am aghast at how little attention has been paid to the low bridge on Ashton Road and how high sided and larger HGVs are unable to pass under it. It is widely reported that Stockport MBC acknowledged this was an issue – especially for Tameside residents – during the last stages of the GMSF and with the assistance of the GMCA assured Tameside Council that this issue would be resolved. Suddenly, this issue appears to no longer exist.

It is simply disingenuous to pretend this issue does not exist.

d. The proposal would contravene UDP Retained Policy – LCR 1.1 Landscape Character Areas.

This proposal would destroy the local natural environment and would impede public access for all to the countryside. Furthermore, the proposal fails to protect or improve existing recreational land.

e. The proposal would contravene UDP Retained Policy – LCR1.1a The Urban Fringe including River Valleys. The policy speaks about enhancing access to the River Valley and protecting it as best as possible. This proposal contravenes this policy at every point.

f. The proposal would contravene UDP Retained Policy – L1.5 Countryside Recreation. The policy speaks about safeguarding the local area's countryside for quiet informal recreation and to "protect the rural environment from intrusive development". This proposal clearly contravenes this policy.

g. The proposal would contravene GBA 1.1 Extent of the Green Belt. The proposal does not maintain openness and conflicts with the Council's own purposes for building in the Green Belt.

h. The proposal would contravene UDP Retained Policy – E1.2 Location of New Business Premises and Offices. The Council states that "land release [for new business premises and offices] should not be at the expense of the Green Belt or other open land policies." This is a clear contravention of the policy.

i. The proposal would contravene Development Management Policy SIE-3: Controlling Pollution 3.348. The policy speaks about positive consideration being given to proposals that "seek to reduce air, noise, light, water or ground pollution". As detailed in the developer's own Environmental Reports submitted to Stockport Council, there would be noteworthy detrimental affects to air, noise, light, water and ground pollution

j. The proposal would contravene Development Management Policy T-1: Transport and Development 3.476.

This policy speaks about the need to facilitate a reduction in the need to travel. Unfortunately, a few cycle lanes will not prevent a large number of heavy goods vehicles from using the new site. Furthermore, the policy speaks about focussing development in the town centre. The proposal is on the northern boundary of the borough of Stockport and not in the town centre.

2. The Greater Manchester context

There are a number of further contraventions and considerations in the Greater Manchester context, including:

a. It is widely known that the GMSF in Stockport failed because of proposals to develop this site alongside a handful of other greenbelt sites

b. there is a lack of consideration to sensitivities this development would have on the Haughton Dale and Hulmes Wood Local Nature Reserves and the Green Belt;

c. the impact this development would have on air quality;

- d. the necessity of this development when the GMSF identifies too much land for future commercial use across the city-region
- e. the impact this development would have on river valleys and water ways;
- f. the detrimental impact this development would have on the Greater Manchester Green Belt
- g. and, the detrimental impact this development would have on Clean Air.

3. No requirement

This development is not required. Stockport MBC's own policy Development Management Policy T-3 3.3.5 Accommodating Economic Development explains that there is "no net requirement for new employment land" in the Borough of Stockport. Furthermore, the Greater Manchester Spatial Framework has identified too much land for future commercial use across Greater Manchester and there are other more suitable sites across the conurbation, such as at Ashton Moss in Tameside.

4. Impact on Tameside

There appears to be a total lack of acknowledgement that this application would have any impact on Tameside.

Tameside Council has formally written to Stockport MBC and the Secretary of State for Housing, Communities and Local Government on 15 December 2020 to object in the strongest possible terms to the development of this site.

5. Lack of Consultation with residents in Tameside

Further to point 4, despite the proposed development coming right up to the border with Denton South, and despite how many of the more negative aspects of this development would impact on Denton South, no proper consultation was undertaken with local residents or councillors on the Tameside side of the border. The Denton South Councillors wrote to the developers to question this and invite them to a fair Question and Answer session in Denton South, which they declined.

The Denton South Councillors and Andrew Gwynne MP also wrote to the Leader of Stockport Council to complain about the lack of consultation and to invite her to meet with the Tameside elected representatives to discuss the issue. To date, there has been no acknowledgement of this letter, let alone a detailed response. Stockport Council and the applicants are totally disregarding Tameside in this process.

6. Traffic

A major concern of residents in Tameside is traffic, especially that many HGVs will have to travel through Denton to reach the M60 due to a low bridge on Ashton Road.

The most recent application details that "there was no evidence that HGVs... have been unable to travel under the railway bridge." This is a lie. It is simply disingenuous to pretend this issue does not exist. No mitigation for this has been considered. In May 2018, Tameside Council conducted a traffic survey (with the agreement of Stockport MBC) on the Bredbury Industrial Estate. Monitoring equipment was located at all the in and out points to the industrial estate.

On 23rd May 2018, in an 18-hour period (6am to 12 midnight) a total of 510 HGVs used Stockport Road, Denton, in order to access or exit the Bredbury Industrial

Estate. The split is: To Denton: 251HGVs | From Denton: 259 HGVs (source: Tameside MBC Highways) It is evident that the existing industrial estate is causing significant traffic problems in the Denton, and this will almost certainly worsen should the park extension happen. This proposal would contravene Development Management Policy T-3 Safety and Capacity on the Highway Network: 3.503.

7. River Tame

We have concerns over the impact this development would have on the River Tame, especially when Stockport Council's own planning policies place such importance on the protection of River Valleys and waterways. The developer's Environmental Reports list the following potential eventualities from this proposal:

- a. an increase in surface water runoff and volume, and the risk of flood and poor drainage, which, if unmitigated, is considered to be Major Adverse
- b. an increased risk foul water runoff, which, if unmitigated, is considered to be Major Adverse
- c. an increased risk of chemical and fuel spillages, which, if unmitigated, is considered to be Major Adverse

Furthermore, this development would be a direct contravention of the UDP Retained Policy - LCR1.1a The Urban Fringe including the River Valleys which speaks about enhancing and protecting the riverside, and UDP Retained Policy - L1.5 Countryside Recreation which speaks about only permitting development which would not spoil the enjoyment of the river valleys or wider countryside through the introduction of noise, excessive traffic or other intrusive features.

8. Air Quality

We have deep concerns over the impact this development would have on air quality. We find it incredible that a development which details slight to large risks for air quality is being considered following such a high-profile campaign on air quality. The developer's Environmental Reports detail "large" risks of dust emissions during construction, and "a slight adverse impact" relating to increased poisonous nitrogen dioxide levels during normal operations. The development would contravene Development Management Policy SIE-3: Controlling Pollution: 3.348.

9. Environment

We have concerns over the impact this development would have on natural habitats. Some of the concerns are listed below:

- a. Concerns relating to the impact on a number of protected sites close to the proposed site, notably Haughton Dale Local Nature Reserve, Hulmes and Hardy Woods, Lower Haughton Meadows and the Peak Forest Canal.
- b. Concerns relating to nearby nesting birds.
- c. Concerns relating to a number of adverse and major impacts on arboriculture relative to the proposal, as detailed in Table K5.1 of the Environmental Statement Chapter K – Arboriculture. Of 31 tree features listed in Table K5.1, the majority of tree features are likely to be adversely affected.
- d. Concerns regarding the impact on badgers. The Environmental Statement Chapter H – Biodiversity states that there are 10 badger setts within 1km of the site

(pg 9). Local residents are concerned that section 117.5 of the Environmental Statement Chapter H – Biodiversity relating to the residual effects on badgers is redacted, in both the during construction and during operations sections.

e. Concerns regarding the impact on Great Crested Newt on the site. The Environmental Statement Chapter H – Biodiversity states that there were three records of Great Crested Newt within 700 metres of the site.

f. Concerns relating to the low-moderate ecologically valuable habitats that are to be lost to the proposal.

g. Concerns regarding the loss of visual amenity and green open space, and concerned over the health implications of this.

With points a-g in mind, this development would contravene Development Management Policy SIE-3 A) Protecting the Natural Environment: 3.345 and Core Policy CS8: Safeguarding and Improving the environment: Green Infrastructure (GI).

10. Noise Pollution

We are concerned about the minor adverse and moderate adverse noise effects this development – both during construction and operations – would have. There is no mention of the noise impact this development would have on nearby Hulmes Wood and Haughton Dale Local Nature Reserves.

11. Loss of Green Belt

Section 1 of this objection details the policies which this development would contravene in relation to the Green Belt, but it ought to be mentioned again. I have grave concerns over the loss of this precious area: once it has gone it has gone forever.

This subsequent planning application suggests that there is more green land than the previous applications. Firstly, a greater amount of green land is taken which was not previously the case: this is not acceptable. But importantly, it is simply not acceptable to take any of this precious green belt land. Exceptional circumstances can be given to explain why the loss of Green Belt may sometimes be necessary: no exceptional circumstances have been detailed.

Conclusion

We hope that elected representatives making the determination on this proposal will consider the long-lasting environmental and health impacts that this development could have on residents in Stockport and Tameside.

In addition to those impacts, elected representatives should also be mindful that no exceptional circumstances have been provided to explain why this section of the Green Belt should be built on.

Indeed, Stockport MBC's own policy Development Management Policy T-3 3.3.5 Accommodating Economic Development explains that there is "no net requirement for new employment land" in the Borough of Stockport.

We hope that elected representatives making this determination will seriously consider the impact and precedent that contravening so many of the authority's own

planning policies could have on future developments in the Green Belt in their ward or across the borough.

We urge elected representatives in Stockport to vote against this proposal.

23.10.2019

On behalf of residents in Haughton Green, Haughton Dale and south Denton, the three elected representatives of these communities - wish to put on record our vehement objection to the proposals to destroy our precious Tame Valley and develop over 110,000sqm of green belt land for industrial use.

Our objection is focussed around the following issues:

1. Contravention of regional and local planning policies
2. Contravention of GMSF considerations
3. No requirement for this development
4. Lack of consultation with residents in Tameside, specifically Denton South
5. Impact on traffic
6. Impact on the River Tame
7. Impact on Air Quality
8. Impact on the environment, specifically biodiversity
9. The risk of noise pollution
10. The loss of precious green belt land

We will now detail each objection.

1. Contravention of regional and local planning policies

a) The proposal would contravene *Core Policy CS8: Safeguarding and Improving the Environment: Green Infrastructure (GI)*.

The development would destroy the openness and beauty of Haughton Dale and Hulmes Wood Local Nature Reserves in Denton South by effectively joining up the settlements of Denton and Bredbury.

The development would make no positive contribution to the enhancement of the natural environment, biodiversity and geodiversity in the local area, another example of how this policy would be contravened.

b. The proposal would contravene *Development Management Policy SIE1-3: Protecting the Natural Environment 3.345*.

This policy highlights the value of the area's rural landscapes, biodiversity, geodiversity and soils, yet the proposal shows no regard for protecting any of these valuable local assets – indeed, the proposal would actively destroy these precious green assets.

c. The proposal would contravene *Development Management Policy T-3: Safety and Capacity on the Highway Network: 3.503*

We cannot stress enough how this policy would be contravened. Bredbury notoriously suffers from heavy congestion, not only during peak times. This development would put greater strain on the road network in that area, having an even greater knock-on effect on the road network in Denton South.

Furthermore, due to the little regard that the developers have given to the low bridge on Ashton Road, many larger HGV's – such as waste vehicles, larger delivery vehicles and vehicles from the nearby bakery – would be forced to travel through Denton, passing some of the increased strain onto Denton South. It is simply disingenuous to pretend this issue does not exist.

d. The proposal would contravene *UDP Retained Policy – LCR1.1a The Urban Fringe including River Valleys*.

The policy speaks about enhancing access to the River Valley and protecting it as best as possible. This proposal contravenes this policy at every point.

f. The proposal would contravene *UDP Retained Policy - L1.5 Countryside Recreation*.

The policy speaks about safeguarding the local area's countryside for quiet informal recreation and to "protect the rural environment from intrusive development". This proposal clearly contravenes this policy.

g. The proposal would contravene *GBA 1.1 Extent of the Green Belt*

The proposal does not maintain openness and conflicts with the Council's own purposes for building in the Green Belt.

h. The proposal would contravene *UDP Retained Policy - E1.2 Location of New Business Premises and Offices*.

The Council states that "land release (for new business premises and Offices) should not be at the expense of the Green Belt or other open land policies." This is a clear contravention of the policy.

i. The proposal would contravene *Development Management Policy SIE-3: Controlling Pollution 3.348*.

The policy speaks about positive consideration being given to proposals that "seek to reduce air, noise, light, water or ground pollution". As detailed in the developer's own Environmental Reports submitted to Stockport Council, there would be noteworthy detrimental affects to air, noise, light, water and ground pollution

J. The proposal would contravene *Development Management Policy T-1: Transport and Development 3.476*.

This policy speaks about the need to facilitate a reduction in the need to travel. Unfortunately, a few cycle lanes will not prevent a large number of

heavy goods vehicles from using the new site.

Furthermore, the policy speaks about focussing development in the town centre. The proposal is on the northern boundary of the borough of Stockport and not in the town centre.

2. Greater Manchester Spatial Framework

There are a number of further contraventions and considerations in the Greater Manchester context, including:

- a. the lack of consideration to sensitivities this development would have on the Haughton Dale and Hulmes Wood Local Nature Reserves and the Green Belt;
- b. the impact this development would have on air quality;
- c. the necessity of this development when the GMSF identifies too much land for future commercial use across the region;
- d. the impact this development would have on river valleys and waterways;
- e. the detrimental impact this development would have on the Greater Manchester Green belt;
- f. and, the detrimental impact this development would have on clean air.

3. No requirement

This development is not required. Stockport MBC's own policy *Development Management Policy T-3 3.3.5 Accommodating Economic Development* explains that there is "**no net requirement for new employment land**" in the borough of Stockport. Furthermore, the Greater Manchester Spatial framework has identified too much land for future commercial use across Manchester.

4. Lack of Consultation with residents in Tameside

Despite the proposed development coming right up to the border with Denton South, and despite how many of the more negative aspects of this development would impact on Denton South, we were aghast that no proper consultation was undertaken with local residents or councillors.

We wrote to the developers to question this and invite them to a fair Question and Answer session in Denton South, which they declined.

5. Traffic

A major concern for residents in Denton South is traffic, especially that many HGV's will have to travel through Denton South to reach the M60 due to a low bridge on Ashton Road.

This issue seems to have been explained away by a handful of pictures showing LGV's travelling under the bridge. It is true that some large vehicles can pass under the bridge, but many – including some waste vehicles, heavy goods vehicles and vehicles from the nearby bakery – have to pass through Denton South.

It is simply disingenuous to pretend this issue does not exist. No mitigation for this has been considered.

In May 2018, Tameside Council conducted a traffic survey (with the agreement of Stockport MBC) on the Bredbury Industrial Estate. Monitoring equipment was located at all the in and out points to the industrial estate.

On 23rd May 2018, in an 18-hour period (6am to 12 midnight) a total of 510 HGVs used Stockport Road, Denton, in order to access or exit the Bredbury Industrial Estate.

The split is:

To Denton: 251HGVs From Denton: 259 HGVs
(source: Tameside MBC Highways)

It is evident that the existing industrial estate is causing significant traffic problems in the Denton, and this will almost certainly worsen should the park extension happen.

This proposal would contravene *Development Management Policy T-3 Safety and Capacity on the Highway Network: 3.503*.

6. River Tame

We have deep concerns over the impact this development would have on the River Tame, especially when Stockport Council's own planning policies place such importance on the protection of River Valleys and waterways.

The developer's Environmental Reports list the following potential eventualities from this proposal:

- a. an increase in surface water runoff and volume, and the risk of flood and poor drainage, which, if unmitigated, is considered to be Major Adverse
- b. an increased risk foul water runoff, which, if unmitigated, is considered to be Major Adverse
- c. an increased risk of chemical and fuel spillages, which, if unmitigated, is considered to be Major Adverse

Furthermore, this development would be a direct contravention of the *UDP Retained Policy - LCR1.1a The Urban Fringe including the River Valleys* which speaks about enhancing and protecting the riverside, and *UDP Retained Policy . L1.5 Countryside Recreation* which speaks about only permitting development which would not spoil the enjoyment the river valleys or wider countryside through the introduction of noise, excessive traffic or other intrusive features.

7. Air Quality

We have deep concerns over the impact this development would have on air quality. We find it incredible that a development which details slight to large risks is being considered following such a high-profile campaign on air quality.

The developer's Environmental Report details "large" risks of dust emissions during construction, and a "slight adverse impact" relating to increased poisonous nitrogen dioxide levels during normal operation.

The development would contravene *Development Management Policy SIE-3: Controlling Pollution: 3.348*.

8. Environment

Many residents in and around Denton South have grave concerns over the impact this development would have on natural habitats. Some of the concerns are listed below:

- a. Concerns relating to the impact on a number of protected sites close to the proposed site, notably Haughton Dale Local Nature Reserve, Hulmes and Hardy Woods, Lower Haughton Meadows and the Peak Forest Canal.
- b. Concerns relating to nesting birds.
- c. Concerns relating to a number of adverse impacts on arboriculture relative to the proposal, as detailed in Table K5.1 of the Environmental Statement Chapter K – Arboriculture. Of 31 tree features listed in Table K5.1, the majority of tree features are likely to be adversely affected.
- d. Concerns regarding the impact on badgers. The Environmental Statement Chapter H – Biodiversity states that there are 10 badger setts within 1km of the site (pg.9). Local residents are concerned that section 117.5 of the Environmental Statement Chapter H – Biodiversity relating to the residual effects on badgers is redacted, in both during the construction and during operations section.
- e. Concerns regarding the impact on Great Crested Newt on the site. The Environmental Statement Chapter H – Biodiversity states that there were three records of Great Crested Newt within 700 metres of the site.
- f. Concerns relating to the low-moderate ecologically valuable habitats that are to be lost to the proposal.
- g. Concerns regarding the loss of visual amenity and green open space, and concerned over the health implications of this.

With points a-g in mind, this development would contravene *Development Management Policy SIE1-3 A) Protecting the Natural Environment: 3.345 and Core Policy CS8: Safeguarding and Improving the environment: Green Infrastructure (GI)*.

9. Noise Pollution

Many local residents are concerned about the minor adverse and moderate adverse noise effects this development - both during construction and operations - would have.

There is no mention of the noise impact this development would have on nearby Hulmes Wood and Haughton Dale Local Nature Reserves.

10.Loss of Green Belt

Section 1 of this objection details the policies which this development would contravene in relation to the Green Belt, but it ought to be mentioned again. Many local residents have grave concerns over the loss of this precious area: once it has gone it has gone forever.

Exceptional circumstances can be given to explain why the loss of Green Belt may sometimes be necessary: no exceptional circumstances have been detailed.

Conclusion

We hope that elected representatives making the determination on this proposal will consider the long-lasting environmental and health impacts that this development could have on residents in Stockport and Tameside.

In addition to those impacts, elected representatives should also be mindful that no exceptional circumstances have been provided to explain why this section of the Green Belt should be built on, and that this development is completely unnecessary as the Greater Manchester Spatial Framework identifies too much land for future commercial use across Greater Manchester. Indeed, Stockport MBC's own policy Development Management Policy T-3 3.3.5 Accommodating Economic Development explains that there is "no net requirement for new employment land" in the Borough of Stockport.

We also hope that elected representatives making this determination will seriously consider the impact and precedent that contravening so many of the authority's own planning policies could have future developments in Green Belt in their ward or across the borough.

We urge elected representatives in Stockport to vote against this proposal.

Cllr. Claire Reid (Denton South)

On behalf of the Denton South Councillors I wish to record our strong objections to Part A (outline) and Part B (full) of the amended planning application DC/074399.

Councillor George Newton has already resubmitted the objections to the original application in the week commencing 2nd March. These comments remain relevant to this application and we wish for these to be considered alongside the additional comments made here:

The application to extend Bredbury Parkway industrial estate into the greenbelt is in conflict with Stockport's own retained and current planning policies as well documented in our original application.

However, the purpose of this correspondence is to object specifically to the full application for the two new industrial units. This proposed development will take up the precious green space adjoining Haughton Dale and Hulme's Wood local nature reserves, negatively impacting on air quality, causing noise nuisance and damaging

the river valley. There will be a consequential increase in traffic on Ashton Road in Stockport and Stockport Road in Denton - and this will have a particular impact in Denton as a result of the low bridge.

We are quite confident the full application for the two specific units are simply the thin end of the wedge and will certainly open the floodgates of precedence for development in the precious green open space. Part B of DC/074399 therefore cannot be considered as a stand alone application.

The application runs against the policies in the council's own local plan and retained UDP policies we referred to in our original objection, resubmitted this week.

The Denton South Councillors wish to reassert our view that this application must be rejected. It does not meet Stockport's own planning policies particularly in relation to greenbelt and river valleys and there are no 'exceptional circumstances' to release this land for employment land as confirmed by Stockport's own local plan.

We urge the Panel to reject this application in its entirety.

Cllr. George Newton

I wish to put in writing my vehement objection to any proposal to develop the greenbelt land adjacent to Bredbury Park Way.

I refer you again to the objection Cllr Claire Reid, Cllr Jack Naylor and I made on 23 October 2019. Our objection remains based on:

1. The contravention of regional and local planning policies
2. The contravention of GMSF consideration
3. That there is no requirement for this development
4. The lack of consultation with residents across an arbitrary border in Tameside
5. The impact on traffic, specifically the impact the low bridge on Ashton Road will have in diverting HGVs through Denton
6. The negative impact the development will have on the River Tame
7. The negative impact the development will have on air quality
8. The negative impact the development will have on the environment and local biodiversity
9. The risk of noise pollution
10. The loss of precious greenbelt land.

CONSULTEE RESPONSES

SMBC Planning Policy – Employment

The amended application proposes a total of 93,184sqm. This comprises an outline proposal for 53,327 sqm of B2/B8 employment floorspace and a full proposal for two commercial/industrial units totalling 39,857 sqm. Of the latter, Unit 1 is 27,479sqm and Unit 2 is 12,378sqm.

The applicant's submissions in respect of the case for employment floorspace rests on four key elements:

1. There is a significant need for employment land within Stockport;
2. There are no sites in urban area that are able to meet need;
3. They have examined alternative sites and this is the only site capable of meeting need;
4. Delivering jobs to local people.

In addressing these matters:

1. With regards to employment policy the relevant Core Policy in the Core Strategy is CS7 'Accommodating Economic Development'. In relation to industrial and warehousing, the policy notes that these uses are likely to generate heavy goods traffic and should be directed to employment areas with good access to the National Strategic Road Network and Local Primary Road Network. The policy specifically mentions the Bredbury Industrial Area in this regard. Whilst it is clear that the policy relates to the existing allocation and not an expanded allocation, the policy specifically notes that there are considerable benefits associated with the clustering of employment uses, and that the Council will seek to build on those benefits. The expansion of Bredbury Industrial Estate would align with this approach. For the purposes of my comments I am not referencing Green Belt considerations as that matter will be considered by my colleague against adopted GB policy, and the NPPF together with an assessment of the case for Very Special Circumstances.
2. The supporting information presented by the applicant refers primarily to the 2015 Employment Land Review (ELR) on the basis that they believe that this is the most appropriate guidance having regard to the assessment of quantitative need. However, the Council's position is that the 2018 version provides an updated position with regards to an overall assessment of need within the borough as a whole. Therefore, in my consideration of the proposal I have had regard to 2018 ELR but have also assessed in light of 2015 for the purpose of directly responding to the evidence presented by the applicant.
3. In relation to industrial demand, in quantitative terms ELR2015 identified a need for 9Ha of industrial land to be delivered through to 2031, which it envisaged this being delivered over a short time period well before 2031. The revised and updated ELR2018 identifies need for 4.8Ha, or 0.25Ha per annum, through to 2035 (Para 9.49) which does not represent a significant need in quantitative terms. The applicant suggests that this figure is too low, however Section 8 of ELR2018 is based on more recent information, primarily the Greater Manchester Forecasting Model (GMFM) 2017, and sets out a methodology for calculating projected employment land need from those GMFM 2017 figures and translating the local labour supply into a land requirement, using plot densities and making adjustments for loss of employment land, vacancy and occupier choice. Loss of floorspace has been a particular issue, with a net loss of B2 and B8 units averaging over 3,000sqm per annum since at least 2006.

4. The GMFM has been updated since the 2017 version which underpinned ELR2018, with a baseline forecast published in 2019. In addition, a further report on the future of employment land needs across Greater Manchester was published in February 2020 (Nicol Economics). Whilst neither document looked in detail at the nature of employment units required in Stockport, both identified the continued trend for additional B2 and B8 floorspace requirements across Greater Manchester.
5. ELR2018 also clearly identifies that there is a qualitative need, particularly in terms of demand for larger units and, recognising this, Para 10.32 identifies the possibility of utilising land at Bredbury Gateway, subject to Green Belt and transport issues. The key issue is whether there are any sites available that are capable of delivering the types of units that are required to meet the needs of particular employment types.
6. With regard to demand, within their submission the applicant has identified a shortage of available sites in Stockport for larger employment units and highlighted that this shortage is causing demand to be met elsewhere outside of the borough, e.g. Swizzles Matlow locating to Middlewich. As noted above, this broad demand for larger units has been recognised in ELR2018, primarily covered in paras 8.64-8.86, and in this regard the argument of the applicant's planning statement regarding the need for larger units (over 100,000sqft) is recognised and supported. However, in the matter of small to medium sized units, Stockport has been able to meet demand on existing employment sites or allocated employment areas within the urban area, e.g. S:Park and Aurora. ELR2018 (Para 9.60) identifies the need for larger units in well-connected prominent locations, of which this broad area would be one. In terms of demand for smaller units, there is greater potential that this could be accommodated by refurbishment of older, under-performing existing stock. The ELR2018 identifies a number of employment sites and areas in poor condition that have the potential for appropriate refurbishment or redevelopment.
7. With regards to alternative sites the exploration of alternative sites in the submission examines them on the basis of the ability to deliver large floorspace units and the shortage of such sites in the area is accepted. Working on the basis of a 40% plot ratio, for a minimum unit of a single 100,000sqft unit this would equate to a plot of around 2.3Ha, so this would be the bare minimum requirement for just one unit. The Planning Statement (para 6.52 onwards) sets out a number of potential alternative sites, both outside and within the Green Belt. The two existing employment units tested that could theoretically meet need in floorspace terms are unable to meet the requirements of the proposed use. Hilti on Bredbury Gateway is restricted by the element of office development and Welkin Mill's layout is unsuited to modern B2/B8 use.
8. Alternative sites explored include Plot 3000 in Ashton Moss and the Littlemoss-Ashton Moss Opportunity Area, both sitting outside of the borough and in both cases their potential is limited by sites constraints such that they would not be

able to be delivered at the relevant scale or within a suitable time period. As such this site represents on the only suitable alternative available.

9. It is noted that the applicant has advanced their argument through the resubmitted documentation in seeking to be able to deliver units of over 4,500sqm, based on there being few available units in Stockport of this size. The most recently submitted information highlights the lack of available space of that size (only 2 units in the 50-100,000sq ft category) in Appendix L3 which sets out the market analysis for Stockport. That same element of the submission illustrates that there is a complete lack of available sites capable of delivering sites of over 100,000sqft (9,290sqm).
10. The applicant contends that for the ability to deliver units over 4,500sqm in the future may be unduly constrained by the imposition a minimum requirement of 9,290sqm. Given the evidence relating to both availability of sites and of qualitative demand a lower floorspace limit of 4,500sqm would ensure that smaller units would not be able to locate here at the expense of existing employment sites and areas in the boroughs, whilst also ensuring that the reason for allowing the development in the Green Belt is not undermined.
11. As a result, and notwithstanding other Green Belt matters, given the nature of the illustrative layout, a matter to be resolved will be the extent of the development area in accommodating the necessary floorspace. The total figure of 93,184sqm is towards the lower end of what is a wide range of employment forecasts. The case that there is a need for larger units in the Stockport area is accepted, albeit this is on a qualitative rather than a quantitative basis. Based on the evidence provided it is considered that substantial weight is given to the need for large scale industrial units, and in this case, that greater than 4,500sqm units are acceptable due to the lack of available land.
12. The applicant makes a case for the impact of Covid (Planning Statement Para 6.24-6.30) and the subsequent need to deliver sites such as this. In the context of utilising Green Belt for employment purposes of this scale, at this stage it is too early to give significant weight to such matters as it remains unclear what medium-long term impacts, if any, will result from pandemic. Whilst the conclusions may turn out to be relevant it may also be that nothing significant changes at all or even that other non-Green Belt sites will become available as a result of a sustained downturn in other economic sectors. Consequently, it is recommended that in assessing the very special circumstances, very little weight should be given to this element of the case. It is however accepted that there has been a substantial increase in the take up of large big box logistics, with over 45million sqft of demand nationally.

JOB CREATION

13. The applicant has submitted information in relation to employment and the provision of job numbers and types as part of the proposed development. The range of numbers quoted in the Employment and Skills Note (para 3.1) is for 1,059– 1,596 full time equivalent [FTE] jobs, based on the proposed floorspaces and this is expanded upon in para 5.1 of that note. Clearly this is a significant range, but given the outline nature of much of the proposal and the possibility for different employment types, even within the B2 and B8 use classes, this is not regarded as unreasonable. The same paragraph (3.1) of that note recognises the importance of “ensuring that the significant level of job growth [Quorum] are providing provides opportunities for local people in the surrounding urban areas including Brinnington, Woodley and Denton to the north which is located in the borough of Tameside.”
14. The matter of jobs and skills for local people is also addressed in the Planning Statement (para 6.40-51). Whilst para 6.48 appears to quote a different number of FTE jobs (949-1,518) to that stated in the Employment and Skills Note the broad reasoning and conclusions to that appear reasonable. It is also important to note that the Employment and Skills note highlights that the range of jobs is not confined to low skilled jobs or to one type of job. A range of jobs are likely to be created as a result of the proposed use, with a variety of skills required to be able to access these jobs.
15. Delivering skills training and future jobs to local populations, particularly those in the surrounding and deprived areas, is a vital part of ensuring that the scheme addresses the matter of VSC. The statement made in that regard is welcomed as part of an approach to identifying the number and types of jobs to be secured locally and towards helping deliver training in the necessary skills for local people to be able to access those jobs. However, in order for the Council to be able to give anything other than limited weight to this benefit there must be a clear indication of how it is intended that the proposal will deliver the relevant levels of jobs and skills training to people in those areas.
16. The Heads of Terms (para 3.13) proposes that an employment and skills scheme focussing on creating jobs for local people should be secured by condition or legal agreement. Paras 6.50-51 of the Planning Statement also refer to this element of the proposal.
17. In assessing the benefit of the scheme in terms of a positive impact on the surrounding areas, securing through a legal agreement a suitable employment and skills scheme in that regard would be a significant benefit to the area.

SUMMARY

As noted above the applicant has set out four key elements to the employment case in relation to the proposal:

i) Significant need for employment land in Stockport

In this case, the need is regarded as qualitative rather than quantitative and it is considered that this case has been made. There is a clear need within Stockport for the largest sized units, over 9,290sqm, but the applicant has also demonstrated a relative lack of suitable and available alternative units in excess of 4,500sqm to meet demand. In order to ensure that only the evidenced need is accommodated on site, and to protect the borough's other employment areas should planning permission be granted a suitably worded planning condition or legal agreement would ensure that units with a minimum floor area be accommodated on the site.

ii) Lack of alternative urban sites

With regards to the qualitative element, it is accepted that there are no alternative sites within Stockport which could accommodate units of the size required to meet need. In particular the low vacancy rate in the adjoining employment area, which is the largest in the borough, is indicative of the lack of available and suitable land for large-scale employment development in the borough. This means that Stockport's ability to deliver the economic growth required will be significantly affected and will result in fewer jobs being delivered for people in the area.

iii) Alternative Green Belt sites

As with urban sites, there are no preferable Green Belt sites available in the area. No sites have been identified that would be better located for the purposes for which the scheme is proposed, i.e. large floorspace B2/B8 employment units.

iv) Creation of local jobs

Given the number of jobs to be created as a result of this development, the socio-economic benefit of the scheme should be considered to carry considerable weight in the consideration of VSC. As noted above, the delivery of jobs as a result of this development would not be likely to occur without the site coming forward, due to the lack of alternative sites in both the urban and Green Belt areas. The applicant has outlined a means of delivering training and skills to ensure that local people are able to access the jobs to be created and this is also regarded as carrying material weight.

18. Overall, given the need for land for large employment units and the lack of alternative sites in the urban area and a lack of better located sites in the Green Belt, this may be regarded as a site suitable for such development which seeks to address the requirement of NPPF Para 82, subject to consideration of all other issues. Therefore, notwithstanding all the other matters to be addressed, should the Council be minded to approve any scheme on the site, consideration should be given to imposing a minimum floorspace for units of at least 4,500sqm, both in terms of total footprint per unit and by way of restricting future sub-division of units.

SMBC Planning Policy – Green Belt

Harm to the Green Belt

Permanence

The planning statement sets out the position that the permanence of Green Belt in this location should be addressed by considering its harm to the purposes of the Green Belt and any consequential effects on the remaining Green Belt. It is outlined that the Stockport Core Strategy and Employment Land Review collectively find there is insufficient land available in the Borough's urban areas to meet the identified needs and a significant qualitative deficiency which cannot be addressed without Green Belt release. The statement made in the Planning Statement with regard to the site's draft allocation in the GMSF and likelihood of an amended boundary in the Local Plan can only be given very limited weight at this stage.

Whilst the position above with respect to the availability of non-Green Belt land to meet the required needs is accepted and forms part of the case for very special circumstances to follow, Paragraph 7.10 and 7.11 concludes, though without supporting evidence, that the site represents the best site for release because it has limited impact on the strategic purposes of the Green Belt and will provide a defensible long-term boundary.

The impact on openness in relation to the proposed scheme is addressed below together with reference to relevant evidence on the contribution to Green Belt purposes and likely harm caused by release of Green Belt.

Openness

Paragraph 133 of the NPPF sets out that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open and the essential characteristics of Green Belts are their openness and their permanence.

Openness can be considered as meaning an absence of built or otherwise urbanising development. The courts have also identified other matters in terms of assessing the impact on openness and have confirmed that the concept of "openness of the Green Belt" is not narrowly limited to the volumetric approach. A number of factors are capable of being relevant when it comes to applying it to the particular facts of a specific case, such as visual impact.

LUC carried out the Greater Manchester Green Belt Assessment (GMGBA) in July 2016, looking at the contribution of parcels of Green Belt to meeting the five purposes as outlined in national planning policy.

The site falls within parcel SP05 and was assessed as scoring 'Strong' for three purposes of the Green Belt. Some of the key contributions of this Green Belt parcel are listed below;

- The parcel plays a strong role in checking urban sprawl between Bredbury Park Industrial Estate and Woodley in respect of exhibiting evidence of existing sprawl (Purpose 1a);
- The parcel plays a strong role in checking urban sprawl between Bredbury Park Industrial Estate and Woodley in respect of protecting open land from the potential for urban sprawl to occur, and in doing so performs strongly in inhibiting ribbon development taking place along internal minor roads and east of the B6017 (Purpose 1b);
- The parcel plays a strong role in preventing towns from merging, and in doing so 'forms part of a critical gap between the settlements of Denton and Bredbury' (Purpose 2);

- It assists in safeguarding the countryside from encroachment, scoring as 'moderate' (Purpose 3). Furthermore, the assessment notes against this purpose that the parcel has a 'relatively intact and rural character and displays some characteristics of the countryside' and therefore not 'relatively featureless' as described in the Planning Statement at Paragraph 7.27.

Paragraph 7.13 of the planning statement states that the parcel is isolated and does not form part of or adjoin a wider land parcel within the Green Belt. However, evidence in the GMGBA finds that the parcel sits across from parcel TS66 and in-between SP03 and SP07. The collection of parcels of Green Belt in this location ultimately form part of the Tame Valley and Brinnington landscape character area (LCA) and form a major green corridor, which leads into the centre of Stockport. It is viewed that the effect of the proposed development on openness and on the purposes of Green Belt is understated in the planning statement. Whilst the mitigation proposed helps to reduce the impact on openness, the original impact on openness both locally and strategically must be correctly quantified.

LUC carried out further assessments in 2020 to consider the harm from proposed allocations in the GMSF and on cumulative harm to the Greater Manchester Green Belt from proposed releases. It was concluded that release of the GMA31 allocation would cause 'high' harm to Green Belt purposes overall and a 'minor' impact on adjacent Green Belt. In relation to cumulative harm on Strategic Green Belt Area 22 it was found that release would constitute sprawl but have a limited impact (Purpose 1) and would reduce an already narrow gap between Bredbury and Denton and weaken its integrity and role it plays in preventing merging, although the wooded riverside banks and lower valley sides provide a clear barrier to settlements merging (Purpose 2).

Consequently it is clear from this evidence that the harm to Green Belt, to which the NPPF affords significant weight, is greater than that which is argued by the applicant, and informs the balancing exercise required when weighing up if a case for very special circumstances exists.

Consideration of the proposal

The revised scheme has reduced a number of relevant aspects. The maximum heights on the buildings are proposed to be not greater than 19.5m, reduced from 23m previously. In addition, the taller units on site are proposed to be located within the site rather than on the edge of the site adjacent the wider Green Belt, to minimise the impact of development on the openness of the Green Belt.

The floorspace has been reduced by around 23,000sqm to 93,184sqm and consequently the buffer between areas of development has been increased from. Thus, whilst clearly development in the location will have an impact on openness, as outlined above, that impact has been reduced from the original proposals. It is not a matter for these comments to suggest whether the scale of floorspace to be provided has been reduced has far as it can in terms of addressing employment matters. However, it is a material consideration to weigh up the benefits to be delivered as a result of the proposal against the harm which would be caused to the Green Belt.

Those benefits would include meeting an identified need for such units, delivering jobs to the local area, both in Stockport and Tameside, and a means to ensure that training and skills will be provided to ensure that people living locally and in the more deprived areas are not prevented from access those jobs through a lack of skills.

Further economic benefits are suggested in the planning statement and these include increasing the competitiveness of Stockport to enable further investment, maintaining a diversified local economy, support to the regeneration programmes of the Council and the location and form of development to enable these benefits.

These are key considerations and also weigh in to the case for very special circumstances. The strategic landscape buffer will deliver a new and enhanced corridor of green infrastructure for users of the site and will increase public access in the adjacent Tame Valley. The proposed improvements to biodiversity, habitat connectivity and recreational opportunities including walking and cycling alongside a softened and clear defensible boundary help to meet guidance in the PPG on compensatory improvements.

Other harm

Caselaw (Redhill Aerodrome Ltd [2014] EWCA Civ 1386, Sullivan, Tomlinson, Lewison LJJ) has established that the phrase “and any other harm” means any harm, not only harm to the Green Belt.

As outlined previously the site falls within Tame Valley and Brinnington LCA, protected by saved UDP Policy LCR1.1 ‘Landscape Character Areas’. This policy sets out that development will not be permitted unless it protects or enhances the quality and character of the rural area. The recent Landscape Character Assessment for the borough identifies this character area to be highly sensitive to any new development and highlights the valley’s function as a green corridor. The proposed development of this scale therefore conflicts with this policy and will cause harm in terms of landscape impact in this location.

SMBC Planning Policy Energy

The energy statement submitted for the above application is compliant with Core Strategy Policy SD3 requirements around energy statement content and addressing carbon reduction targets.

Stockport’s Core Strategy Policy SD3 includes a minimum carbon reduction target for commercial development of 30% over part L 2006. This target was superseded in 2014 by changes to the Building Regulations. However the policy requirement still remains for an energy statement showing evidence of consideration of the technical feasibility and financial viability of district heating and micro generation technologies.

The energy statement for this application clearly shows consideration of technical feasibility for low / zero carbon technologies. Some of the financial viability is not included but this has always been problematic for types of development where eventual occupants will determine energy demand and it is not feasible to determine specifics at this stage of design.

There is a proposal to consider solar generation and air source heat pumps on this development which is welcomed. In 2019 Stockport Council declared a Climate Emergency recognising that the climate crisis requires urgent action to ensure average global temperature rises are limited to 1.5 degrees. In Stockport's Climate Action Now document the Council has laid out its aim (alongside other Greater Manchester councils) to be carbon neutral by 2038 and recognising the need for a shift to decarbonise energy options.

SMBC Environmental Health Officer (EHO) Contaminated Land

I have no objections in principle based on the information submitted subject to the following conditions relating to contamination and Landfill Gas, including monitoring and management:

Full:

- CTM2
- CTM3
- LFG3

Outline:

- CTM1
- CTM2
- CTM3
- LFG 1
- LFG3

SMBC Environmental Health Officer (EHO) Noise

An updated NIA has been submitted in support of the application: Volume 2: Environmental Statement, Chapter E: Noise & Vibration, December 2020 by JPM Acoustics Ltd, Ref: 42046/03/SPM 18208892v1.

Scheme Layout

The final scheme layout was not available at this stage in the design/ planning application process; therefore, the NIA was based on an illustrative scheme layout at Figure E4.1 Illustrative Scheme Layout and Receptor Locations.

Any amendments to the planning layout must comply with the NIA or the NIA maybe required to be reviewed accordingly.

Methodology

The impact arising from noise and vibration during the developments construction and operational phase noise has been assessed in accordance with:

- The Design Manual for Roads and Bridges (DMRB): Sustainability & Environment Appraisal: LA 111: Noise and Vibration: Revision 2
 - BS4142:2014 Methods for rating and assessing industrial and commercial sound
 - BS5228 parts 1 and 2 for construction noise and vibration
- Approved methodology for the assessment of the noise sources.

Noise Mitigation

The report recommends noise mitigation and monitoring measures (at section 6) designed to ensure that occupants of nearby properties are not adversely affected by noise arising from the proposed developments construction and operational phases.

To protect noise sensitive receptors from operational noise, figure E3.1 in Appendix E3 details proposed barrier locations and heights, for the southern portion of the site, to protect Receptor C and Receptor D from noise emissions from the service yard areas of the illustrative layout.

The assessment prediction modelling exercise, has determined that with appropriate barriers in place the illustrative scheme layout would achieve the derived noise level limits.

At section: E3.17 A final scheme layout is not available at this stage; therefore, this assessment has been undertaken based on an illustrative scheme layout.

SUMMARY

The reports methodology, conclusion and recommendations are accepted by this service.

This is an outline application, this service requests that it is further consulted, should the final layout differ from the illustrative layout that the December 2020 has assessed: E6.11 a further assessment of suitable mitigation measures should be undertaken once the final scheme layout has been decided, to account for the arrangement of the final scheme.

December 2020, Noise Impact Assessment (NIA)

In support of the OUTLINE application, the applicant has submitted an acoustic report: Volume 2: Environmental Statement, Chapter E: Noise & Vibration, December 2020 by JPM Acoustics Ltd, Ref: 42046/03/SPM 18208892v1.

The December 2020 NIA, relates to Layout: Figure E4.1, pg. 16, Illustrative Scheme Layout and Receptor Locations.

Any amendments to the planning layout must comply with the NIA or the NIA maybe required to be reviewed accordingly. For this purpose the following noise condition is recommended:

RECOMMENDATION

In accordance with the December 2020 acoustic report, the following conditions are necessary in order for this application to be approved and any subsequent application for approval of reserved matters shall address the following:

The mitigation recommended in the acoustic report Volume 2: Environmental Statement, Chapter E: Noise & Vibration, December 2020 by JPM Acoustics Ltd, Ref: 42046/03/SPM 18208892v1.

- Shall be implemented in full prior to the first use of the development.
- The agreed mitigation scheme shall be maintained for the purpose originally intended throughout the use of the development.

Reason: In accordance with paragraph 180a) of the National Planning Policy Framework, February 2019: mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life

Should the layout design detailed in the December 2020 NIA, differ at the next planning application stage (reserved matters) - any amendments to the planning layout, must comply with the NIA or the NIA maybe required to be reviewed accordingly. For this purpose the noise measurement criteria as previously agreed with this service is applicable (see section E2.54, page 10, Volume 2: Environment Statement, Chapter E: Noise and Vibration and Environment Statement 3, Appendix E1, Noise & Vibration) by Stockport Metropolitan Borough Council (SMBC) first by phone and then confirmed by e-mail on the 15th May 2018, to agree the survey and assessment methodology for this chapter. (or can be discussed/ agreed in writing at a future date with the LPA prior to submission of any future applications):

The industrial estate will be operational 24 hours a day. Therefore, the following condition is recommended:

Noise Condition: No Process Machinery Outside Building(s)

All processes, including manufacture and repair, associated with the use hereby approved shall take place within the building(s) on the application site only.

Reason: To prevent an increase in background sound levels and protect the amenity of any residents. In accordance with: Paragraphs 170(e) & 180(a) of the National Planning Policy Framework (February 2019).

External Lighting Assessment

Any external lighting shall be designed to minimise potential loss of amenity caused by light spillage onto adjoining properties.

Prior to its installation, the details of the location, height, design, and luminance of any external flood lighting shall be submitted to and approved in writing by the Local Planning Authority.

The external lighting scheme shall show levels of illumination around the site (isolux drawings) and any overspill lighting beyond the site boundary.

Mitigation measures or installation requirements shall be clearly identified on the external lighting scheme drawings: time controls/light sensors or other control methods.

Once approved, the agreed external lighting scheme shall be installed and thereafter operated in accordance with the approved details.

Reason: To limit the impact of light pollution from artificial light on local amenity, In accordance with: paragraph 180c of the National Planning Policy Framework (February 2019)

Lighting Informative: Installation of Lighting Schemes

Any external area lighting shall be designed and installed by competent persons. The system shall be designed according to best practice in respect of glare, light spill, efficiency and appropriate hours of operation based on illumination required for the task or site operations. Advice can be obtained from the Institution of Lighting Professionals at <https://theilp.org.uk/> or other equivalent professional organisations.

The scale of the development is such that an extended build period is considered likely which may impact on neighbouring noise sensitive properties. I would therefore recommend a Construction Environmental Management Plan condition is attached to any approval decision notice.

Construction Environmental Management Plan

A Construction Environmental Management Plan (CEMP) shall be submitted for assessment by the LPA:

The CEMP shall address the environmental impact in respect of air quality and noise on existing residents during the demolition and construction phase. There shall be no burning of materials on site during construction and the CEMP shall be implemented throughout the demolition and construction phase of the development.

The CEMP shall show mitigation measures in respect of:

- Noise Mitigation Measures

Noise and disturbance during the construction phase including piling techniques, vibration and noise limits, monitoring methodology, screening, a detailed specification of plant and equipment to be used and construction traffic route. Comply with BS5228:2009 Code of Practice for Noise and Vibration Control on Construction and Open Sites – Part 1: Noise and Part 2: Vibration

- Dust Management

For the prevention of dust emissions beyond the site boundary, a scheme detailing all dust suppression measures and the methods to monitor emissions of dust arising from the development. The demolition / construction phase shall be implemented in accordance with the approved scheme, with the approved dust suppression measures being maintained in a fully functional condition for the duration of the demolition / construction phase.

- Pile Foundation Method Statement

Should piling be required as part of the development, the applicant shall submit a method statement, to be approved by the LPA. The piling work shall be undertaken in accordance with the approved method statement. The method statement shall include the following details:

1. Details of the method of piling
2. Days / hours of work
3. Duration of the pile driving operations (expected starting date and completion date)
4. Prior notification to the occupiers of potentially affected properties
5. Details of the responsible person (e.g. site manager / office) who could be contacted in the event of complaint

Reason: In accordance with paragraphs 170 and 180 of the National Planning Policy Framework 2019.

ENVIRONMENTAL HEALTH INFORMATIVES

Informative comments are designed to assist developers in the prevention, minimisation and control of noise and dust arising from the construction phases of the development for the purpose of protecting the residential amenity of occupiers of nearby dwellings.

Construction & Demolition Sites - Hours of Operation

Any works which can be heard outside the site boundary must only be carried out between:

Monday to Friday 7.30 am – 6.00 pm

Saturday 8.00 am – 12:30 pm

Sundays, Public and Bank Holidays - No noisy working audible from the site boundary

Please view the guidance notes for contractors (PDF 300kb) for more information.

SMBC Environmental Health Officer (EHO) Air Quality

I have looked at the air quality assessment submitted with this application and it states that the traffic information will remain the same as the scheme submitted in 2018.

I am happy with the methodology of the report conclusions within the report.

The mitigation recommended within the report shall be followed. A dust management plan shall be submitted for approval prior to the commencement of any works.

SMBC Employment and Skills

I am happy that the minimum construction employment and skills targets have been incorporated into the Employment and Skills Note. I have also noted that they have committed to engaging with the Council in the development of an Employment and Skills Agreement to deliver on these construction targets and also to secure end user jobs and skills opportunities.

08.09.2020 comments

From an Employment & Skills perspective, my general comments on the Bredbury Gateway application, and the opportunities it has the potential to create, for bringing new people into the labour market employment are generally supportive and have been reflected in my earlier consultation response.

In addition, in terms of the construction element of the Employment & Skills Plan, that we would need to see developed as a condition, we would be looking for the submitted Employment & Skills Plan to address achieving the following outcomes, based on the £80m design and build cost identified in the Planning Statement (these outcomes are based on the Construction Industry Training Board benchmark indicators that the Council has adopted):

Employment and Skills Plan

The developer is required to complete an Employment and Skills Plan (ESP) covering the following employment and skills areas, and expected KPI minimum outcomes from the table below:

Work Placements 3

Jobs Created 11

Construction Careers Information, Advice and Guidance (CCIAG) Events 5

Training Weeks 417

Qualifying the Workforce 25 of which: Qualifications 11

Short Duration training 14

Training Plans 6

Case Studies Approved (minimum per year) TBC

For further information, a supporting CITB document is provided to explain the KPI's. The actual outcome figures will be agreed with the developer. The developer is to use their own judgement as to what additional outcomes they may consider are achievable in relation to the Project. The Employment & Skills Plan (ESP) will expect to see monthly or quarterly estimates for when outcomes for each benchmark will be achieved over the lifetime of the construction.

Employment and Skills Plan Method Statement

The developer will be required to provide a detailed Method Statement, in conjunction with the outcomes in the Plan setting out how they intend to implement the employment and training requirements and to deliver the Employment and Skills Plan (ESP). The Method Statement should clearly set out the proposed approach for delivering the employment and skills outcomes, covering the following:

- Who in the organisation will be responsible for managing the training scheme and overseeing the proposals?
- Previous experience of delivering employment and skills objectives in major construction projects
- Which education and training providers will be involved with the delivery of the ESP?
- What types of accredited and non-accredited training are expected to be offered and who are expected to be the main beneficiaries of this training?
- Which trades or occupational areas is it envisaged will be offering Apprenticeship opportunities?
- What types of Apprenticeship are expected to be offered (e.g. subjects and levels)?
- How will the target outputs as set out in the ESP be delivered?
- How will health and safety issues be managed?
- What actions will be taken to ensure the support of trade contractors and sub-contractors working on the project?
- How will compliance be managed (and monitored) with respect to the organising trade contractors and subcontractors?

The Employment & Skills Plan and the Method Statement should be developed and agreed in consultation with the Council's Economy, Work & Skills Team, and should also involve the contractors that are commissioned to build the development.

Officers in the Economy, Work & Skills Team will be able to actively support the successful contractor to build partnerships with local training and employment providers, who will be in a position to support the commitments to engage unemployed people, and deliver on the training needs.

SMBC Nature Development Officer

Please note that these comments update those previously submitted on 14 October 2020 following various meetings and discussions / emails with the ecological consultants and subsequent submission of additional and updated ecological survey information and amendments to the scheme design. The following updated documents have been submitted and reviewed:

- Landscape Masterplan (Rev G 8383-L-01 dated 8 February 2021)
- Detailed Planting Plan (Rev G 8383-L-02-08 dated 8 February 2021)
- ES Chapter H Biodiversity (dated 21 January 2021 NB two versions of this document have this date. These comments relate to the most recent version of the ES Chapter which was submitted to the LPA on 8 February 2021)
- Ecological Assessment (Rev I)
- Badger Survey and Mitigation Strategy (Rev D)
- DEFRA Metric 2.0 dated 8 February
- Lighting Plan P183-500-C

Site Context

The site is located in Bredbury and is approx. 30ha, extending from Turner Lane next to the River Tame in the north, to Bredbury Industrial Estate in the south and Ashton Road in the west. The application involves:

Part A: Outline planning permission with all matters reserved 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: 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).

Legislative and Policy Framework **Nature Conservation Designations**

The site itself has no nature conservation designations legal or otherwise. It is however directly adjacent to Botany Mill Wood Site of Biological Importance (SBI). Outside Stockport, Hulmes & Hardy Woods and Lower Haughton Meadows Local Nature Reserve (LNR) and SBI exists approx. 50m from the site on the opposite side of the River Tame (Hardy Woods is listed on Natural England's Ancient Woodland Inventory).

The ES chapter states that Botany Mill Wood SBI will be protected through implementation of a Construction Ecological Management Plan (CEMP) and provision of a habitat buffer along the SBI/woodland edge. This buffer is a minimum of 18m which is a big improvement compared with earlier submitted plans., It is considered that the buffer along with the submitted sensitive Lighting Plan, and a strict CEMP, will help ensure the SBI and woodland habitats would not be significantly adversely impacted by the proposals.

Habitat Assessment and Biodiversity Impact Assessment (DEFRA Metric)

Ecological surveys have been carried out to inform the Environmental Impact Assessment (EIA). The surveys have been undertaken by suitably experienced ecologists. It is not clear why the EIA (dated January 2021) follows CIEEM Guidelines for Ecological Impact Assessment (EclA) 2016 guidelines as these were updated and replaced in September 2018.

Habitats

An extended Phase 1 Habitat survey was carried out in December 2016, updated in June 2018 and further updated by walkover surveys in 2019/2020. The survey aimed to map habitats present on site and assess their potential to support protected species. Habitats on site include semi-improved grassland, with tall ruderal, scrub, hedgerows, trees and ponds. The main Phase 1 habitat surveys were carried out at suboptimal times of year to undertake habitat condition assessments. However due to the nature of the habitats on site and given that site visits were undertaken for other ecology surveys at various times throughout the years of survey, it is considered that this has allowed for an adequate understanding of baseline conditions.

Hedgerows

The hedgerows on site qualify as UK Priority BAP habitat (80% or more cover of at least one woody UK native species). Hedgerow Assessment surveys were undertaken in December 2019. This is a sub-optimal time of year for hedgerow surveys, however the Ecological Assessment Report states that the assessment is also based on observations during site visits within the optimal season and so this is not considered to be a significant limitation to the overall assessment.

Hedgerow 1 and Hedgerow 9 were both identified as important hedgerows. Much of Hedgerow 1 would be removed under the proposals whilst Hedgerow 9 will be retained. Many of the hedgerows (particularly those internal to the site) would also be lost under the current proposals.

The submitted Landscape Masterplan and Detailed Planting Plan shows on-site hedgerow planting to help offset this loss. The DEFRA metric and Ecological

Assessment Report state that 3.55km of new hedgerow will be created on-site together with 0.3km of retained hedgerows on-site to be enhanced. The ES Chapter states that 3.63km of new hedgerow will be planted on-site (para H7.9) but it is assumed that is a typo.

Off-site hedgerow compensation measures are also proposed at Tiviot dale and Woodhall Fields within Reddish Vale. It is proposed to enhance 0.43km of existing hedgerow and create 0.8km of hedgerow. Biodiversity Net Gain (BNG) calculations using the DEFRA 2.0 Metric have been submitted to show there would be an overall gain of 10% hedgerow units (including both on-site and off-site mitigation).

Ponds

Three ponds have been identified on site. All three ponds will be lost due to the proposals. All ponds are a Greater Manchester BAP Habitat and can support diverse assemblages of invertebrates and amphibians (including great crested newt and common toad – a UKBAP species). Three attenuation ponds are proposed within the scheme to the north of the site. Furthermore, a 600m² pond is proposed off-site (to be designed for biodiversity) within Woodhall Fields at Reddish Vale. It would be preferable if two smaller ponds were created (to cover the same overall area) to provide greater diversity of habitat niches.

Grassland and other habitats

Although not a UKBAP or LBAP/priority habitat, the grassland and scrub habitats on site would also be lost under the proposals. These habitats are nonetheless a valuable resource for local wildlife, functioning as habitat corridors and foraging areas. The submitted Landscape Masterplan and Detailed Planting Plan shows the provision of new woodland, grassland and scrub along with scattered trees. Nonetheless, opportunities to compensate for the proposed habitat loss are limited within the development site, and therefore an off-site compensation plan has been proposed within Reddish Vale Country Park. This will involve enhancement of 6.2ha of grassland at Woodhall Fields and 3.8ha of grassland at Tiviot Dale. It is stated within the Ecological Assessment and Environmental Statement (and submitted DEFRA 2.0 metric) that together with on site and off site mitigation measures, there will be a 10.32% net gain in habitat units.

Habitat off-setting Commuted Sum

Details regarding the calculation of the proposed monetary value to fund off-site habitat enhancement and creation has been provided within Appendix 7 of the Ecological Assessment Report. These costs include maintenance and monitoring of the habitats for 30 years (which is in accordance with Principle 8: Create a Net Gain Legacy of the Biodiversity Net Gain: Good Practice Principles for Development (CIEEM, CIRIA & IEMA, 2016).

To create 600m² of pond habitat, enhance 6.2ha grassland at Woodhall Fields, enhance 3.8ha grassland at Tiviot Dale along with maintenance and monitoring for 30 years, costs have been estimated at £71, 8881.

To create 80m of new hedgerow and enhance 430m of existing hedgerow within the Reddish Vale site, along with management and monitoring for 30 years, costs

have been estimated at £24,118. The table shows a figure of £22.40 for trimming the new hedgerow. It is assumed that this is a typo – the estimated total of £4100.40 for the new hedgerow, minus £250 monitoring and minus £3028 management, leaves £822.40. Even despite this increase, the overall estimated hedgerow trimming costs appear quite low to cover the 30 year period. Some of the proposed management techniques however, are not appropriate for hedgerows in this region. Casting up is a form of hedgerow management more common in the West Country whilst top binding and stacking is a traditional form of hedge laying used in the Welsh borders and southern England. The estimated costs for these forms of management would therefore be better used for other forms of management including additional hedge trimming (e.g. new hedgerows benefit from regular trimming to promote bushy growth). To that end, the overall estimated hedgerow management costs seem broadly appropriate compared with previously submitted figures that were provided as part of earlier submissions of the application. It should be noted however that **the cost to create the 80m of new hedgerow does not appear to have been included within the total and this needs to be added.**

The overall total habitat offsetting commuted sum is estimated in the Environmental Assessment report to be approx. £96,000. This figure is supported by the metric calculations and evidence relating to estimated habitat management costs. Providing the costs associated with new hedgerow creation are added to this figure, it would be considered appropriate to secure adequate compensatory habitat offsetting.

Legally Protected Species

Bats

All species of bats, and their roosts, are protected under Section 9 of the Wildlife and Countryside Act 1981 (as amended) and The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. The latter implements the Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora. Bats are included in Schedule 2 of the Regulations as 'European Protected Species of animals' (EPS).

Under the Regulations it is an offence to:

- 1) Deliberately capture or kill a wild EPS
- 2) Deliberately disturb a wild EPS in such a way that significantly affects:
 - a) the ability of a significant group to survive, breed, rear or nurture young.
 - b) the local distribution of that species.
- 3) Damage or destroy a breeding place or resting site of such an animal.

Buildings

Bat survey work, including internal and external building inspections were undertaken in August and September 2017 to assess the potential of the buildings to support roosting bats and search for evidence of bat presence. Inspections were undertaken using binoculars, a high powered torch and an endoscope. No evidence of roosting bats was observed and the six buildings at

Mill Hill Farm were assessed as offering negligible potential to support roosting bats.

The inspection survey was extended in 2020 to include the buildings at Finland Park Farm. All buildings were subject to an internal and external inspection. No evidence of roosting bats was discovered and the three buildings at Finland Park Farm (B7, B8 and B9) were considered to offer negligible bat roost potential.

Update survey work in 2019 found scattered bat droppings in Mill Hill Farm Building B4. It was initially thought that these were likely to be from brown long-eared bats as moth wings (considered to represent feeding remains) were also observed. Subsequent DNA analysis confirmed the droppings as being from common pipistrelle bat. No potential roosting features were identified within the building above where the droppings were found despite a thorough re-inspection with an endoscope in March 2020. An emergence survey was carried out in May 2020 and no bats were observed to emerge from the building. It is therefore concluded that the barn is used by foraging bats rather than a roost site.

Trees

All trees proposed for removal were subject to a ground based assessment of bat roosting potential. Trees identified as offering potential roost features were then subject to climb and inspect surveys in 2019. No evidence of roosting bats was discovered and several of the roosting features were discounted/suitability downgraded as upon closer inspection they were found to be damp or otherwise unsuitable for use as a bat roost site. However, the absence of bat field signs does not necessarily mean that a potential roosting feature is no longer suitable for future use by bats. I would therefore recommend a method statement is prepared detailing soft-fell techniques of all trees with bat roost potential to be felled as a precautionary measure.

Transects

A desktop and daytime assessment of the foraging potential of the site is provided in the Ecological Assessment. The site boundary hedgerows and tree lines were assessed as offering 'priority' foraging and commuting bat habitat whereas 'intra-site hedgerows' were assessed as being 'sub-optimal'. Although all the hedgerows provide good foraging and commuting habitat for bats, the linear site features along the north-eastern and south-western boundaries of the site have been identified as priority bat foraging and commuting habitat.

Bat transects were undertaken in August and September 2020. An automated bat detector was also left in situ for 7 nights to record bat activity. Activity from common pipistrelle, soprano pipistrelle, brown long-eared and noctule bats was recorded. It is acknowledged in the Ecological Assessment that best practice survey guidelines were not followed in that no transect survey data is available for spring (BCT guidelines recommended one transect survey per month between May-September). Also BCT guidelines advise that two automated detector points are recorded per transect for a minimum of 5 nights each month). The Ecological Assessment concludes however that a sufficient level of survey effort has been carried out to adequately assess potential impacts. Particularly given the proposed mitigation (e.g. min 18m buffer along the northern site

boundary with Botany Mill Wood SBI, landscape planting on-site and sympathetic lighting strategy).

A sympathetic lighting scheme to avoid light-spill on important bat foraging habitats has been submitted. This will ensure that light levels are kept to below 3 lux on sensitive habitats to minimise potential disturbance impact to commuting and foraging bats.

Badgers

Badgers are protected under the Protection of Badgers Act, 1992. This makes it an offence to kill or injure a badger or to damage, destroy or obstruct access to a sett. It is also an offence to disturb a badger while it is in a sett. A badger survey was undertaken in August 2017 with follow up visits carried out in January, February and March 2018. A five-hole sett was recorded, along with a single-hole setts. Camera monitoring was undertaken at the five-hole sett for five nights and at the one-hole setts for four and two nights respectively. Single badgers were recorded during the camera monitoring. A bait-marking study was undertaken but no latrines were found.

The bait marking study was repeated and extended to include Botany Mill main sett located off-site and also habitats to the north of the application area. The survey was carried out between January and March 2020. Several latrines were discovered during the extended bait marking study and it was concluded that the badgers on site belong to a different social group to the Botany Mill sett. A main sett and an outlier sett would be lost to the development as well as approx. 85% of the badger clan's grassland foraging habitat (based on assumed territory size outlined in the badger report). Badger main setts are typically created in close proximity to high quality foraging habitat which therefore indicates that the grassland to be lost represents optimal foraging resource.

The proposed badger mitigation includes provision of a new replacement sett and closure of the main sett and outlier sett following a method statement (to be submitted) and under licence from Natural England. The proposed location of the replacement sett appears to be appropriate and the submitted lighting strategy/light spill plan demonstrates that the area of the new replacement sett will be unlit (less than 3 lux). Use of the replacement sett will be monitored.

It is also proposed that a badger tunnel is provided under the new access road to maintain habitat connectivity to the southwest of the site (identified as an important foraging area). Some information regarding the tunnel and associated landscape planting/fencing (to guide badgers into the tunnel and keep them off the road) have been provided within the submitted Badger Survey and Mitigation Strategy Report. It states that the tunnel will be minimum 600mm diameter, created in an embankment and a soak away incorporated to provide adequate drainage. The lighting strategy also shows that the tunnel entrances will not be subject to light disturbance (i.e. less than 3 lux). Use of the tunnel by badgers will be monitored. It is also advised that monitoring of the tunnel is continued even after it has been demonstrated that badgers use the tunnel, to ensure that the tunnel remains functional (e.g. does not become blocked or flooded). Badger

fencing will also require regular on-going monitoring to ensure it is sited appropriately and its integrity is maintained.

It is proposed that the loss of grassland foraging habitat will be mitigated for by fruit tree and hedgerow planting along with some small areas of grassland creation. Seasonal berries and fruits are not considered an adequate substitute for the large scale loss of grassland which would offer a year-round supply of earthworms (the principal food resource of badgers). Moreover, impacts associated with habitat loss/ badger displacement can lead to increased risk of territorial disputes between neighbouring badger clans. The resultant residual impact associated with this loss has therefore been assessed in the Environmental Statement as moderate adverse. To manage this residual impact it is proposed that a 10 year bait marking study will monitor the long-term viability of the social group so that remedial action can be taken as appropriate.

Great Crested Newts (GCN)

Great crested newts and their habitats (terrestrial and aquatic) receive the same level of protection as bats (see above). Three ponds have been identified within the site with a further six ponds identified within 250 metres of the site. Habitat Suitability Index (HSI) assessment of the ponds have been carried out as part of the extended phase 1 habitat survey and two of the ponds were assessed as 'poor', with the third found to be 'below average' suitability. Suitable terrestrial habitat for GCN exists on site (e.g. through the presence of scrub and hedgerows).

An eDNA GCN survey of the 'below average' pond was carried out on 15 April 2020. The result was negative which suggests that GCN are absent.

Birds

The nests of all breeding birds are protected under the Wildlife and Countryside Act (1981) as amended. The buildings, trees, hedges, scrub and grassland habitats can support nesting and foraging birds and habitats could also support small numbers of wintering birds. Evidence of swallows nesting within barns on site was identified.

Invasive Species

Himalayan balsam is present on site and during my previous site visit was observed in the northeast corner of the site along Turner Lane. This species is listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) Mapping the distribution of this invasive species will be required along with appropriate management and treatment procedures.

LDF Core Strategy

Core Policy CS8 Safeguarding and Improving the Environment

Green Infrastructure

3.286

Biodiversity and Nature Conservation

3.296

DEVELOPMENT MANAGEMENT POLICY SIE-3

A) Protecting the Natural Environment

Protecting, Safeguarding and Enhancing the Environment

3.345, 3.346, 3.347, 3.361, 3.362, 3.363, 3.364, 3.365, 3.366, 3.367 and 3.369

Stockport's Unitary Development Plan (Retained Policy)

NE1.2 SITES OF NATURE CONSERVATION IMPORTANCE

The habitats and biodiversity of sites of biological importance, geological conservation sites and local wildlife sites will be protected and enhanced where possible. Proposals for development on sites so designated must demonstrate that there is a justification which overrides any harm to the nature conservation value of the site.

Recommendations:

It is considered that adequate ecological information has been submitted to inform determination of the application. A mitigation package is proposed within the Ecological Assessment Report, Environmental Statement and Badger Survey Report. This will help to reduce potential impacts and secure suitable compensation. It is requested however that the **proposed commuted sum in Appendix 7 of the Ecological Assessment (Revision I) is amended to include the cost to create hedgerow off-site as this is currently missing** from the estimated total cost.

It is important that retained habitats (including the SBI and river corridor) are adequately protected during the construction phase. The following condition should therefore be used: [BS42020: D.4.1] No development shall take place until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the LPA. The CEMP shall include:

- a) risk assessment of potentially damaging construction activities
- b) identification of 'biodiversity protection zones'
- c) measures and sensitive working practices to avoid or reduce impacts during construction
- d) location and timing of sensitive works to avoid harm to biodiversity
- e) times during construction when specialist ecologists need to be present on site to oversee works
- f) responsible persons and lines of communication
- g) roles and responsibilities on site of an ecological clerk or works (EcOW) where one is required
- h) use of protective fences, exclusion barriers and warning signs

and shall include details of measures to:

- Avoid the impact on nesting birds
- Avoid the spread and details of treatment (where appropriate) of invasive species listed on Schedule 9 of the WCA
- Avoid negative impact on sensitive ecological features during construction (such as the SBI, retained hedgerows)

- and trees etc) and protect all retained features of biodiversity interest.
- Sensitive working measures and RAMS to be adopted when felling trees (e.g. soft fell - bats) and draining down ponds/clearing vegetation (amphibians) and relating to badgers (see also badger condition below).

In relation to breeding birds, the following condition would be relevant to any planning permission relating to the site: [BS42020: D.3.2.1] No demolition/vegetation clearance works should take place between 1st March and 31st August inclusive, unless a competent ecologist has undertaken a careful, detailed check of buildings/structures and vegetation for active birds' nests immediately before demolition/vegetation clearance works commence and provided written confirmation that no birds will be harmed and/or that there are appropriate measures in place to protect nesting bird interest on site. Any such written confirmation should be submitted to the LPA. This can be incorporated into the CEMP if preferred.

[BS42020: D.3.10] Prior to the commencement of development, an invasive non-native species protocol shall be submitted to and approved by the LPA, detailing the containment, control and removal of Himalayan balsam on site. The measures shall be carried out strictly in accordance with the approved scheme. This can be incorporated into the CEMP if preferred.

It is vital that lighting is sensitively designed so as to minimise impacts on wildlife (e.g. foraging/commuting bats and badgers) associated with light disturbance and ensuring the SBI is protected from light spill/remains an unlit zone is of particular importance. Lighting should follow the principles outlined in Bat Conservation Trust guidance: http://www.bats.org.uk/pages/bats_and_lighting.html in conjunction with careful landscape planting to further protect sensitive habitats from light disturbance. All lighting should therefore be carried out in strict accordance with the submitted Lighting Plan P183-500-C unless otherwise approved by the LPA.

No development shall commence until a detailed Mitigation Strategy for Badgers has been submitted to and approved by the LPA. The mitigation strategy will include:

- Details of sett closure
- Details of measures to be implemented during the construction phase to minimise impacts to badgers e.g. during site clearance and construction works
- Detailed design of proposed replacement sett
- Detailed design of proposed badger tunnel (to be a minimum of 600mm diameter and be created in an embankment with soakaway to ensure adequate drainage)
- Details of proposed badger fencing
- Details of long-term monitoring programme for the replacement sett, tunnel and fencing along with 10 year bait marking study of the on-site social group together with roles and responsibilities for

monitoring and mechanism to secure any required remedial measures.

The badger mitigation scheme shall thereafter be completed in accordance with the approved details.

An informative should be used so that the applicant is aware of legal protection that badgers receive. It should also state that a licence from Natural England will be required prior to commencement of works. Works must be carried out in accordance with the conditions of any such licence.

Net gains for biodiversity are expected within development in accordance with national and local planning policy (NPPF and paragraph 3.345 of the LDF). The DRFRA metric 2.0 calculations indicate that the on-site and off-site proposed mitigation will deliver a BNG of 10% gain in hedgerow units and 10.32% gain in habitat units.

The submitted Landscape Masterplan and Detailed Planting Plans show provision of new habitats on site. It would also be expected that bat and bird boxes should be provided on site and details of the proposed number, type and location of bat and bird boxes should be submitted to the LPA for review. This can be secured via condition.

A Landscape and Ecological Management Plan (LEMP) for habitats and species on-site should also be submitted in conjunction with the on-site landscaping scheme, and needs to consider the roles and responsibilities for delivery of subsequent long-term (for a minimum of 30 years) management measures. [BS42020 D4.5]: A Landscape and Ecological Management Plan (LEMP) shall be submitted to, and be approved in writing by the LPA prior to the commencement of development. The content of the LEMP shall include the following:

- a) Description and evaluation of features to be managed
- b) Ecological trends and constraints on site that might influence management
- c) Aims and objectives of management
- d) Appropriate management options for achieving aims and objectives
- e) Prescriptions for management actions
- f) Preparation of a work schedule (including an annual work plan to be rolled forward for long-term management for a minimum of 30 years)
- g) Details of the body or organisation responsible for implementation of the plan
- h) Ongoing monitoring and remedial measures.

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still

delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details.

In relation to the proposed off-site habitat enhancement and creation and subsequent long-term management of these areas the below condition can be used. This will secure a management plan to detail the proposed creation, enhancement and long-term maintenance and monitoring of the off-site habitats outlined within the Ecological Assessment (Rev I) and the DEFRA Metric (dated 8 February 2021). The commuted sum to cover the creation, maintenance and monitoring costs can be secured via a Section 106 agreement.

Before the development hereby approved is commenced, a scheme for the offsetting of biodiversity impacts at the site shall be submitted to and approved in writing by the Local Planning Authority. The proposed offsetting scheme, as detailed in the Ecological Assessment Revision I, shall provide for the creation and/or improvement of habitat/s in line with the principles established in the Environmental Statement (Chapter H, dated 21 January 2021 version 2):

- i. Details of the offset requirements of the development, in accordance with a recognised biodiversity offsetting metric,
- ii. The identification of a receptor site or sites which deliver meaning full and measurable net gain in line with Ecological Assessment Rev I;
- iii. The provision of arrangements to secure the delivery of offsetting measures, including a timetable for delivery;
- iv. A management and monitoring plan, to include for the provision and maintenance of the offsetting measures for a period of no less than 30 years from the commencement of the development. The management and monitoring plan is to include:
- v. Description of all habitats to be created/enhanced with the scheme including expected management condition and total area;
- vi. Review of the ecological constraints;
- vii. Detailed designs and/or working methods (management prescriptions) to achieve proposed habitats and management conditions, including extent and location of proposed works;
- viii. Type and source of materials to be used, including species list for all proposed planting and abundance of species within any seed mix/planting scheme;
- ix. Identification of the persons responsible for implementing the works;
- x. A timetable of ecological monitoring to assess the success of all habitat creation/enhancement.
- xi. A timetable of future ecological monitoring to ensure that all habitats achieve their proposed management condition as well as description of a feed-back mechanism by which the management prescriptions can be amended should the monitoring deem it necessary. All ecological monitoring and all recommendations for the maintenance/amendment of future management shall be submitted to and approved in writing by the Local Planning

Authority.

The offsetting scheme shall thereafter be completed in accordance with the approved details.

Ecological conditions can change over time. If the development has not commenced within two years of the submitted survey work, update ecological surveys will be required. The following condition can be used to secure this update survey and ecological assessment.

If the development hereby approved does not commence (or, having commenced, is suspended for more than 12 months) within 2 years from the ecological surveys (2019 or 2020 depending on the ecological receptor), the approved ecological measures secured through the above conditions shall be reviewed and, where necessary, amended and updated. The review shall be informed by further ecological surveys commissioned to:

- i) establish if there have been any changes in the ecological baseline and
- ii) identify any likely new ecological impacts that might arise from any changes.

Where the survey results indicate that changes have occurred that will result in ecological impacts not previously addressed in the approved scheme, the original approved ecological measures will be revised and new or amended measures, and a timetable for their implementation, will be submitted to and approved in writing by the local planning authority prior to the commencement of development. Works will then be carried out in accordance with the proposed new approved ecological measures and timetable.

GM Ecology Unit

As you are aware GMEU have previously provided comments on this application, both directly to the planning department and via the applicant's ecological consultants Rachel Hacking Ecology Ltd. An updated landscape masterplan (REV G), detailed planting plan (REV G), ES Chapter H biodiversity (submitted 08/02/2021), updated Ecological Assessment (Rev I) and Badger Survey and Mitigation Strategy (REV D) have been produced, along with more detail of the proposed lighting on the site (plan P183-500-C), and submission of the DEFRA Metric 2.0 (08/02/2021). These comments supersede our previous comments submitted in October 2020.

An extended Phase 1 habitat survey was undertaken in December 2016 and updated in June 2018. In addition to this, day time bat inspections of the buildings on the site were undertaken in August and September 2017, and badger surveys in August 2017 and January and March 2018. Updated habitat surveys including hedgerow surveys were carried out in late 2019 and 2020. All trees on the site were subject to a bat roost assessment, including a climb and inspect to investigate any features with potential to support a bat roost. A great crested newt survey (eDNA) was undertaken in April 2020. The badger survey work was also updated and extended to include bait marking between 30th January 2020 and 13th March 2020. Bat inspections of the buildings were updated and extended to include the buildings to at Finland Park Farm, and an emergence survey at building 4 was undertaken in

May 2020. Activity transects on the fields and woodland edge were undertaken in August and September 2020.

My previous comments have noted several inconsistencies between some of the reports and a lack of justification for some of the survey methodology. There were also documents missing from the submission, such as the lighting plan and the biodiversity net gain metric. It appears that the majority of this has now been rectified, and some of the additional detail required can be secured via a condition.

Specific comments on the scheme are provided in the sections below, along with recommendations for conditions.

1) Protected sites

No legally protected sites are present within the development site or directly adjacent to the site. However there are a number of statutory and non-statutory sites within 1km of the site, one of which (Botany Mill Wood Site of Biological Importance (SBI)) is directly adjacent to the northern boundary of the site. The ES chapter states that the SBI will require protection through a CEMP and a habitat buffer zone along the northern edge of the site will be provided. The Landscape Masterplan (8383-L-01 Rev G) submitted with the application does now show a much enhanced continual planted buffer zone along the SBI/woodland edge, which is much improved from previous submissions. The ecology report states that this is a minimum of 18m from the woodland/SBI edge, and in many places is wider than this. Along with the proposed CEMP this should be sufficient to buffer the woodland from any adverse impacts during the construction phase of the scheme. The lighting plan also demonstrates sufficiently low lux levels along the woodland edge to avoid any adverse impacts on the SBI.

Recommendations

- A condition should be used to ensure that no development commences until a Construction Environmental Management Plan (CEMP) for the site is submitted to the LPA for approval, this should include measure to protect the SBI and River Tame from any adverse impacts of the development during the construction phase, including fencing of the buffer zone prior to the commencement of the ground works on the site. Once approved the CEMP must be implemented in full (see also General Recommendations below). In addition to protection of the SBI, other measures are recommended for inclusion in the CEMP (see other comments)

2) Priority habitats/species

Hedgerows

The hedgerows on the site qualify as Priority Habitat being comprised of >80% native woody species. Further survey work and assessment in relation to hedgerows has now been undertaken. Hedgerow 1 and 9 were identified as being Important under the Hedgerow Regulations. The majority of H1 will be lost as a result of the development, and H9 is retained as it outside of the site boundary. Much of the existing hedgerows on the site will be lost as a result of

the proposed development, however the landscape plan indicates increased hedgerow planting in the site and enhancement of the retained hedgerow, and provision for off-site hedgerow creation and enhancement of existing off-site hedgerow.

Ponds

There are three ponds on the site which will be lost as a result of the proposed development. Three new attenuation ponds are proposed within the scheme to the north of the site, and a compensatory pond (600m²), designed for biodiversity is proposed as part of the off-site measures at Woodhall Fields. I would probably prefer creation of several smaller ponds rather one of this size, however the principle of the area of pond to be created is acceptable and the finer details can be determined via the suggested condition.

Grassland

A large area of grassland will be lost as a result of the proposed development. While this grassland may not be species rich and therefore does not qualify as Priority Habitat, it does provide a valuable area of green space and will be an important resource for local wildlife (for foraging and as a habitat corridor for example). Opportunities to compensate for this loss are limited within the site, although there is some provision on site, however 10ha on offsite grassland enhancement is proposed at Woodhall Fields and Tiviot Dale, within Reddish Vale Country Park.

Woodland/Scrub

The woodland to the north of the site, the majority of which is within the SBI, is also priority woodland habitat. Areas of scrub will also be lost as a result of the proposal, however the onsite planting will compensate for this loss.

Off-Site Commuted Sum

The scheme now includes a provision for off-site compensatory measures through habitat restoration/creation (hedgerow, ponds and grassland) proposed within Tiviot Dale and Woodhall Fields within Reddish Vale Country Park. The DEFRA Metric demonstrates a 10% net gain for both habitats and hedgerows can be achieved with onsite and off-site habitat creation/enhancement. The revised scheme, with careful supervision and appropriate long-term management will hopefully compensate for the impact of the scheme and deliver biodiversity net gain, and a commitment for 30 years management and monitoring has been made. While some detail is provided in relation to the potential areas for habitat creation, full details of the management plan have not been provided, these can be secured via a condition.

Appendix 7 of the ecology report contains details of suggested costs to achieve the figures produced in the Defra Metric, and are largely based on published costs. For habitat creation of 600m² pond and enhancement of 10ha of grassland (3.8ha at Tiviot Dale and 6.2ha at Woodhall Fields), with 30years management and monitoring a sum of £71,881.

The table relating to hedgerow creation in Appendix 7 does not appear to have included the cost of creation of the 80m of new hedgerow on the site, which needs to be added to the overall total.

The total for hedgerow management for 30 years (of new and existing hedgerow) is £24,118.70. The total amount is justified by the proposed management interventions at different frequencies through the 30 years. The total for hedge trimming is lower than I would have anticipated, however some of the other management techniques proposed are probably not suited to hedgerows in Greater Manchester, as they tend to be by styles of management associated with hedgerows in other regions. In principle therefore the amount proposed for hedgerow management is justified, and the exact details of the management can be secured through a management plan via condition.

Recommendations

- The costings within Appendix 7 of the Ecological Appraisal should be updated to include creation of the 80m of new hedgerow at Woodhall Fields. Once this has been provided these figures can be used to secure a section 106 agreement with the Local Authority.

- In addition, as information on the proposed off site habitat creation and management are not detailed, we would recommend this condition is used to secure production of a habitat management plan for the off-site habitats. The below wording may be appropriate:

Before the development hereby approved is commenced, a scheme for the offsetting of biodiversity impacts at the site shall be submitted to and approved in writing by the Local Planning Authority. The proposed offsetting scheme, as detailed in the Ecological Assessment (Rev I), shall provide for the creation and/or improvement of habitat/s in line with the principles established in the Environmental Statement (Chapter H submitted 08/02/2021):

- i. Details of the offset requirements of the development, in accordance with a recognised biodiversity offsetting metric,
- ii. The identification of a receptor site or sites which deliver meaning full and measurable net gain in line with the Ecological Assessment (Rev I);
- iii. The provision of arrangements to secure the delivery of offsetting measures, including a timetable for delivery;
- iv. A management and monitoring plan, to include for the provision and maintenance of the offsetting measures for a period of no less than 30 years from the commencement of the development. The management and monitoring plan is to include:
- v. Description of all habitats to be created/enhanced with the scheme including expected management condition and total area;
- vi. Review of the ecological constraints;
- vii. Detailed designs and/or working methods (management prescriptions) to achieve proposed habitats and management conditions, including extent and location of proposed works;

- viii. Type and source of materials to be used, including species list for all proposed planting and abundance of species within any seed mix/planting scheme;
- ix. Identification of the persons responsible for implementing the works;
- x. A timetable of ecological monitoring to assess the success of all habitat creation/enhancement;
- xi. A timetable of future ecological monitoring to ensure that all habitats achieve their proposed management condition as well as description of a feed-back mechanism by which the management prescriptions can be amended should the monitoring deem it necessary. All ecological monitoring and all recommendations for the maintenance/amendment of future management shall be submitted to and approved in writing by the Local Planning Authority.

The offsetting scheme shall thereafter be completed in accordance with the approved details.

- Measures to protect retained habitats on the site (such as the retained hedgerows) should be included within the CEMP.

3) **Bats**

The works proposed result in the demolition of the farm buildings on the northern end of the site, and buildings associated with Finland Park Farm at the south-east of the site, as well as removal of a number of hedgerows, ponds and trees which are likely to provide foraging and commuting habitat for bats.

Updated bat survey inspections of the buildings were undertaken in 2019 and 2020. The majority of the buildings were assessed to have negligible potential to support roosting bats, however scattered bat droppings were found within building 4. These were confirmed via DNA analysis as being common pipistrelle. No potential roosting features were identified within the building despite a thorough re-inspection of the beams other building features with an endoscope. 1 emergence survey of this building was undertaken in May 2020 and no bats were seen to emerge from the building. The building is therefore most likely to be used for foraging rather than any type of day time roost.

A desktop and daytime assessment of the foraging potential of the site is provided in the ecology report, and bat activity transects of the site were walked in August and September 2020, as well as a static detector being deployed within the site. All trees proposed for removal were examined from the ground to assess their bat roost potential, and trees with potential roost features were subject to an aerial inspection, which allowed the roost features to be further classified. No evidence of bat roosts was found, however the description of some of the features means they are still suitable for roosting bats, even in no evidence was found.

The lighting scheme for the site has now been submitted and demonstrates a lux level of less than 3lux on areas which will likely be used by bats, meaning that there are unlikely to be negative impacts of the scheme on bats.

Recommendations

- The lighting scheme for the site must be undertaken in full accordance with the submitted lighting plan
- The CEMP should include measures to detail a method statement for the felling of trees where PRFs were identified, even when no bat roosts are present.
- Enhancement for bats within the scheme, including provision of bat boxes within retained mature trees would be beneficial, given the loss of buildings and trees with potential roost features.

4) Badgers

A badger survey of the site was undertaken in 2017/2018, which included bait marking and camera trapping on the site was initially submitted to establish the use of the site by badgers, however no latrines have been located to enable the bait marking. On the request of GMEU and the Stockport Nature Development Officer, this study was extended to include bait marking of a main off-site sett (Botany Mill Wood Main Sett) as well as further survey work north of the proposed scheme, and further survey work on the site has located more latrines.

The survey work has demonstrated that a main sett and an outlier sett are located within the proposed development site, occupying a different badger territory to than the badgers associated with the sett at Botany Mill Woods.

The main sett and outlier sett will be lost as a result of the proposed development, along with a good proportion of the high quality badger foraging habitat which surrounds the main sett, and is likely to be optimal feeding ground. The bait marking study has also demonstrated that the on-site badger territory extends northwards of the site, and up to the River Tame.

Work to close the badger setts on site can only be done under a Natural England licence which would usually be applied for/issued on the grant of planning permission once all conditions relating to badgers have been discharged.

A proposed location for the new main sett is detailed in the plans and is acceptable in principle. The loss of foraging habitat on the site is proposed to be compensated for with fruit tree and hedgerow planting, however this is unlikely to compensate fully for the loss of extensive grassland habitat. As such the ES has concluded there could be moderate adverse impact of the scheme on badgers, due to the loss of feeding habitat and risk of territorial disputes with other badger clans. To mitigate for this a number of measures are proposed, including a commitment to 10 years bait mark monitoring of the badger setts to establish how the badgers are using the site and to monitor the long term impacts on this social group.

In addition other measures for badgers are required and have been committed to within the application, including a mammal tunnel and badger fencing, monitoring of the new sett and tunnel and a lighting scheme which demonstrates the new badger sett and woodland edges will not be subject to

high levels of external lighting. The principles of the mitigation are acceptable, however further detail will be required and can be secured via a condition.

Recommendations

- A condition should be used to secure a detailed mitigation plan for badgers, which must be in line with the principles laid out in the submitted information. This includes, details of the sett closure and measures which will be required to minimise impact of badgers during the site clearance and construction, detailed design of the replacement sett (including how badgers will be encouraged to use the sett), detailed design of the proposed tunnel and badger fencing (tunnel to be a minimum of 600mm diameter, created in an embankment with adequate drainage and baited to encourage use) and details of the long term monitoring of the tunnels, new sett and 10 year bait marking study of the badger clans, with provision to implement and remedial measures highlighted by this monitoring. Once agreed in writing with the LPA the badger mitigation strategy must be carried out in full.
- An informative should be used to ensure the applicant is aware that badgers are legally protected from any harm, injury or killing and from disturbance, and that their setts are legally protected damage, destruction and obstruction. The proposed work can only be undertaken under a Natural England licence and following the conditions of any such licence.

5) Great Crested Newts

There are ponds present on the site and adjacent to the site which have had a Habitat Suitability Index (HSI) carried out as part of the ecological assessment. The two ponds on the site which had HSIs were assessed as poor and the third pond adjacent to the site scored 'below average'. An eDNA survey of the pond for great crested newts has been undertaken, which returned a negative result, suggesting great crested newts are not present in the pond.

Recommendation

No further information in relation to great crested newts is required. It is recommend that the drainage of the existing ponds is undertaken following a method statement to prevent impact on any other wildlife present in the pond (other amphibians for example), which can be secured through a condition or included within the CEMP.

6) Nesting birds

The habitat on the site (buildings, trees, hedgerows, grassland etc) is suitable for nesting birds, and evidence of use of the farm buildings by swallows was found. The active nests of all wild birds are protected under the Wildlife and Countryside Act, 1981 (as amended).

Recommendation

A condition should be used so that the applicant is aware of the legal protection that active bird nests receive. Work (building demolition, site and

vegetation clearance) should be timed to avoid the main bird nesting season (March - August inclusive) unless it can otherwise be demonstrated that no active birds' nests are present. Compensatory measures must be put in place to ensure no loss of bird breeding opportunities as a result of the proposed development, including the loss of the swallow nesting site.

7) Invasive Species

No invasive species were recorded on the site within the extended phase 1 habitat survey, however Himalayan balsam is present on the periphery of the site, along the north/north east boundary of the site.

Recommendation

No development should take place until a management plan for the control (treatment and prevention of spread) of Himalayan balsam is submitted to the LPA for approval. This should be based on the most up to date survey work available, and follow best practice methodologies. Once approved in writing by the LPA the method statement should be carried out in full.

8) General Recommendations

In addition to the above specific issues, I would also make the following more general recommendations:

- The EIA recommends that Construction and Environmental Management Plan (CEMP) is produced and followed, which will contain details for the protection of the SBI from factors such as run-off, noise and dust pollution and protection of retained habitats. I would advise that this is secured through a suitably worded condition in line with BS42020. The scope of the CEMP should also be extended to cover a number of the recommendations already discussed such as prevention of spread of invasive species, impact on nesting birds and suitable method statements for activities such as felling of trees (e.g. soft felling of trees in relation to bats), site clearance (nesting birds/amphibians) and sensitive pond drainage (amphibians).
- In addition to recommendations already made for offsite compensatory habitat creation and management, a 30 year management plan for habitats on the site is also advised. This should be secured through a suitably worded condition which requires a Landscape and Ecological Management Plan (LEMP) to be submitted to the LPA for approval. This LEMP should be linked to the final landscape scheme for the site and include details of the long term funding and monitoring of the proposals (GMEU can provide suggested wording for this in line with BS42020).
- If the development has not commenced within two years of the latest survey work (2019/2020 depending on the receptor), updated ecological surveys will be required, and mitigation measures may need to be altered as a result of any change in the ecology of the site.

- All lighting for the site should be installed in strict accordance with the submitted Lighting Plan P183-500-C unless otherwise approved by the LPA.

Natural England

Natural England have previously commented on this proposal and made comments in our letter dated 08 January 2020. The advice contained in our previous response applies equally to this amendment although we have made no objection to the original proposal. The proposed amendments are unlikely to have significantly different impacts on the natural environment than the original proposal.

08.01.2020 comments

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

Sites of Special Scientific Interest Impact Risk Zones

The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on "Development in or likely to affect a Site of Special Scientific Interest" (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI.

Soils and Land Quality

From the documents accompanying the consultation we consider this application falls outside the scope of the Development Management Procedure Order (as amended) consultation arrangements, as the proposed development would not appear to lead to the loss of over 20 ha 'best and most versatile' agricultural land (paragraph 170 and 171 of the National Planning Policy Framework).

For this reason we do not propose to make any detailed comments in relation to agricultural land quality and soils, although more general guidance is available in Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, and we recommend that this is followed. If, however, you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

SMBC Arboriculture Officer

Site Context

The site is located off Bredbury Park Way. Proposal is for an outline application to re-develop the site for a commercial development of multiple units within the fields to the north and east of Bredbury Park Way.

Legislative and Policy Framework

Conservation Area Designations:

The proposed development is not within a Conservation Area or affected by this development.

Legally Protected Trees:

There is no legally protected tree within this site or affected by this development.

Stockport's Core Strategy DPD:

CS – 8 Biodiversity and Nature Conservation

SIE-1 Development Management

SIE-3 Protecting, Safeguarding and enhancing the Environment 3.345/3.346/3.347

Stockport's Unitary Development Plan (Retained Policy)

NE1.1 SITES OF SPECIAL NATURE CONSERVATION IMPORTANCE

NE1.2 SITES OF NATURE CONSERVATION IMPORTANCE

NE3.1 PROTECTION AND ENHANCEMENT OF GREEN CHAINS

Recommendations:

The proposed development in relation to the redevelopment of the site for both the commercial and car parking areas will have a negative impact on trees located on site, however the existing trees on site are a mix of low/Medium value trees along the boundaries or natural regenerated young trees which have a low value and therefore, would be a minimum loss in an arboriculture aspect if lost as they can easily be replaced through a good quality landscaping plan.

The main concern for the development is the potential for encroachment/potential damage from machinery working in close proximity of the trees shown for retention within the site. The sites front and rear boundary has a fair level of vegetation and trees and as such there cannot be any loss of trees on site as this will have a negative impact on amenity and biodiversity without an enhanced landscaping plan showing an agreed level of replacements.

The construction materials or vehicles may also impact on the trees and as such an advisory should be required to be given to make contractors aware of the proposed retained trees and the installation of protective fencing to limit access to these areas to prevent compaction, accidental damage or spillage of chemicals on the root zones of all trees in the whole of the property. In addition, the proposed storage areas and site compound should not be located anywhere near to the retained trees as compaction and accidental damage is more likely to occur and so the site compounds need to be conditioned away from the trees.

Further consideration will need to be given to the size of the proposed buffer areas along the existing woodland areas, quantity and quality of proposed replacement planting within the site with increased numbers and improved avenue creation to improve biodiversity and wildlife movement through the site.

In addition to the new tree planting more understorey species such as Holly and Yew to be considered along with the entire retained woodland copses areas, which are being retained to screen the development and maintain a wildlife corridor around the perimeter of the site thus making it a key retained feature of the local environment and enhance the site as well as the biodiversity of the area.

The trees offer a high level of biodiversity/habitat benefit and as such they need retaining as the loss of the boundary trees would be unacceptable as this would be further increasing urban sprawl of Bredbury area.

The proposed open space land and small ornamental planting should all be reconsidered to link with the surrounding environment and all planting should be native species to lessen the impact and create as many wildlife corridors and habitats in the area where there has been significant loss. In addition due to the size of the site and the proposed structures more Green Infrastructure should be considered in green roofs or walls as enhancement and increases access for all to wildlife areas. It would be good to see a level of fruiting trees planted throughout this area to increase access for free fruit to all.

Finally consideration needs to be given to the environmental impact the development will have on the access routes to the site and where appropriate a site meeting will be required prior to commencing on site with the tree officer to agree the route in, the remedial tree pruning and replacement planting on the approach highways for the development which will reduce accidental damage and increase tree cover along the routes to minimise the impact from the increased vehicular access.

In principle the scheme as a whole will have a negative impact on the trees in the area, however due to the low amenity values or young natural regen, which can be easily compensated and enhanced through the landscape plan and should be considered for approval from an arboriculture aspect. If the scheme is considered for approval then an enhanced landscaping plan showing replacement planting with appropriate species for the local environment and a protective fencing plan and an advisory restricting all access to the protected trees in the property and adjoining the property area will be required to limit any damage relating to tree issues.

The following conditions are required if the scheme is approved;

Condition Tree 1

No existing tree within the site shall be cut down, topped, lopped, uprooted, wilfully damaged or wilfully destroyed without the prior written approval of the local planning authority, with the exception of those indicated otherwise on the approved plan. Any hedgerows, woody plants or shrubbery removed without such consent or dying or being severely damaged or being seriously diseased, within 5 years of the development commencing, shall be replaced within the next planting season with trees of such size and species as may be approved in writing by the local planning authority.

Condition Tree 2

No development shall take place until all existing trees on the site except those shown to be removed on the approved plans, have been fenced off in accordance with BS 5837:2012 "Trees in relation to construction - Recommendations". The fencing shall be retained during the period of construction and no work, excavation, tipping or stacking of materials shall take place within any such fence during the construction period.

Condition Tree 3

No development shall take place until details of all proposed tree planting, including the intended dates of planting, have been submitted to and approved in writing by the local planning authority. All tree planting shall be carried out in accordance with the approved details prior to the development being brought into use.

SMBC Highway Engineer and PROW

Impact on the highway network

A Transport Assessment has been submitted in support of the planning application; the scope of which was agreed with the Highway Authority at pre-application stage. This includes an assessment of the site's trip generation based on traffic counts carried out at the existing eastern section of Bredbury Industrial Estate (for the proposed B2 use) and TRICS data (for the proposed B8 use) and trip generation is based on a scenario that the split between B2 and B8 floor space is 40/60. As B2 uses generate greater traffic volumes than B8 use, any planning approval granted would need to be subject to a condition restricting the amount of B2 floor space to no greater than 36,526 sqm GIA (40%), as the TA does not include any assessment for a larger amount of B2 floor space.

The assessment estimates that the development would be expected to generate 340 two-way vehicle movements between 0730 and 0830 (270 light vehicles and 70 HGVs) and 318 two-way vehicle movements between 0830 and 0930 (208 light vehicles and 110 HGVs). In respect to the afternoon peak, the assessment outlines that the development would be expected to generate 310 two-way vehicle movements between 1630 and 1730 (253 light vehicles and 57 HGVs) and 181 two-way vehicle movements between 1730 and 1830 (136 light vehicles and 45 HGVs). As outlined above, since the application was originally submitted, the scheme has been revised so as to reduce the floorspace by 20%. As such, these figures are reduced from the figures presented in the original TA (approx. 75 fewer vehicles per hour). Some of the subsequent modelling work, however, is based on the vehicle movements that would have been generated by the original larger floorspace and, as such, will slightly overestimate the impact of the development.

Based on census journey to work data and traffic survey data, these vehicle movements have been distributed onto the local highway network. For cars, it is estimated that 19% of vehicle movements will be to / from the north (from Tameside), 54% to / from the motorway network, 8% from Stockport and 17% to / from the Bredbury direction. For HGVs, slightly fewer vehicle movements are estimated to be to / from the north (11-14% AM, 7-8% PM) around 50% to / from the motorway network, 17% to / from the Bredbury direction and 10-31% via Crookilley Way (these figures depend on time of day and whether a vehicle is arriving or departing). These figures have then been inputted into a VISSIM microsimulation traffic model to determine what the impact that these additional vehicle movements would have on the local highway network and determine what mitigation measures will be required.

The VISSIM microsimulation model that was built to assess the development includes Ashton Road, Stockport Road East/West, Crookilley Way, Lingard Lane, Bredbury Parkway and sections of the M60, including junctions 25 and 26, and the model has been designed to assess the impact of the development during both the

AM and PM peak periods. Initial modelling work concluded that the additional vehicle movements that would be generated by the development would have a material impact on the local highway network and, as such, various mitigation measures were drawn up and modelled so as to determine whether such measures sufficiently mitigated the impact of the development. These mitigation measures (junction improvements) comprise of:

- 1) Upgrading and repositioning the existing Ashton Road / Bredbury Parkway (north) junction to form a signal-controlled junction, as shown on drawing VN60707-D122 Rev G.
- 2) Upgrading the existing Ashton Road / Bredbury Parkway (south) junction through the provision of an extended right-turn ghost island (and improved pedestrian / cycle facilities), as shown on drawing VN60707-D118 Rev D.
- 3) Amending and signalising the Ashton Road roundabout junction, as shown on drawing VN60707-D115 Rev F.
- 4) Part-signalising the M60 Junction 25 roundabout through the introduction of signals on the northbound approaches from the M60 and Crookilley Way, as shown on drawing VN60707-D116Rev D.

The impact of the development has therefore been assessed (for both 2023 and 2028) by comparing the operation of the existing highway network with how it would operate if the development was implemented, together with these mitigation measures / junction improvements. The results of this assessment were originally presented in Technical Note 13 and are included in the latest TA. The VISSIM model that has been produced and the results that have been derived from the model have been reviewed by a specialist modelling consultant who has confirmed that the model is suitable for the purpose of assessing the impact of development on the network.

In terms of overall network performance, the modelling shows that, with the mitigation measures in place, the network would not be significantly affected by the additional traffic that would be generated by the development. For both 2023 and 2028, the modelling indicates that the mitigation package should sufficiently mitigate the impact of the development, with slight reductions in average delay per vehicle and travel time during the AM peak and slightly larger reductions between 16:30 and 17:30. Average speed of vehicles through the network is also predicted to increase slightly during the PM peak.

In terms of journey time, the modelling shows that for some routes on the network, journey times will increase slightly and for some routes, times will reduce slightly. During the AM peak, the increases are focused on the motorway network and Bredbury Parkway (with vehicles taking longer to exit onto Ashton Road to the north). During the PM peak, the modelling shows improved journey times on the majority of routes, with significant improvements on routes between Ashton Road / Crookilley Way and Stockport Road East and exiting the M60 northbound at J25.

The performance of individual junctions has also been assessed. The results of this modelling are as follows:

Bredbury Parkway North / Ashton Road: This junction is proposed to be re-aligned and upgraded to a signal controlled junction as part of the development. Modelling shows minimal queuing would occur on the Bredbury Parkway arm both during the AM and PM peak periods, with northbound queues of up to 9 vehicles on Ashton Road, queues of up to 5 vehicles right turning into Bredbury Parkway and southbound queues of up to 19 vehicles.

Ashton Road / Lingard Lane: The modelling shows that the existing signal controlled junction experiences congestion at peak periods, with queues on all 3 arms, with long queues on both the Lingard Lane and Ashton Road southbound arms. Although the development will add additional traffic to the network and no changes are proposed to this junction, the modelling shows that the wider mitigation package will result in significant reductions in queue length on both the Lingard Lane and Ashton Road southbound arms and no material change on the Ashton Road northbound arm.

Bredbury Parkway South / Ashton Road: This junction is proposed to be retained as a priority controlled (give-way) junction but improvements are proposed to be carried out to extend the right-turn pocket on Ashton Road and the two-lane approach on Bredbury Gateway. The modelling shows that these improvements, together with the wider mitigation package, should sufficiently mitigate the impact of the development and should result in a slight reduction in queue lengths.

Ashton Road roundabout: This junction is proposed to be modified and signalised as part of the development, with modifications including additional flare lanes on the approaches and additional circulatory lanes. The modelling shows that, following the development and with the junction improvements implemented, there will be a reduction in queues on the Ashton Road and M60 slip road approaches but an increase in queues on the Crookilley Way approach (up to 14 vehicles). These would be able to be accommodated on this link without backing up to the southern roundabout and it could be argued that the benefits in respect to queue reductions on the other arms outweigh the impact of additional queuing on this arm.

M60 junction 25 roundabout: As part of the development, this roundabout is proposed to be part-signalised, with signals provided on the M60 off-slip and Crookilley Way northbound approaches. The modelling shows that, following development and with the junction improvements implemented, there will be a significant reduction in queues on both the M60 off-slip and Crookilley Way approaches, with the greatest reductions occurring on the Crookilley Way approach.

Ashton Road / Whitefield Road: The modelling shows that the existing signal controlled junction experiences congestion with queues of up to 15 vehicles on Ashton Road (northbound) during the AM peak and 10 vehicles (southbound) during the PM peak. Following development and with the mitigation measures in place, it outlines that there will be a reduction in queuing during the AM peak, but a slight increase in queuing (by 1-3 vehicles) during the PM peak

Stockport Road West / Ashton Road: The modelling shows that the existing signal controlled junction experiences congestion at peak period, with queues on all 3 arms, with long queues on both the Stockport Road West arms. Although the

development will add additional traffic to the network and no changes are proposed to this junction, the modelling shows that the development won't lead to a material change in the operation of this junction. Whilst a slight increase in queuing is predicted on the Stockport Road eastbound arm during the PM peak, a reduction on this arm is predicted during the AM peak and slight reductions are predicted on the Stockport Road westbound arm.

M60 Junction 26: The modelling shows that this junction would not be materially affected as a result of the development and a small reduction in queuing is predicted to occur on the Crookilley Way eastbound approach.

Based on the results of the VISSIM modelling I would conclude that the proposed mitigation measures will sufficiently mitigate the impact of the development. Whilst parts of the network will remain congested and there are certain links and arms of junctions which will experience an increase in queues or delays, any increases are not predicted to be significant and these will be offset by a reduction in queues and delays elsewhere.

The Council's modelling consultant has, however, outlined that the modelling indicates that vehicles travelling south through the Ashton Road / Bredbury Parkway South junction may block vehicles turning right into Bredbury Parkway South, which has the potential of causing queuing back to the Ashton Road roundabout. This issue has been reviewed by the applicant's consultant who concluded that the modelling may overestimate the amount of vehicles right-turning into Bredbury Parkway South and queue length analysis indicates that this should not be an issue and the roundabout should not be affected. The Council's modelling consultant, however, has nevertheless recommended that this issue is monitored over time and, if it is subsequently found to be an issue, he has outlined that a queue loop detector should be provided within the right turn pocket linked to the Lingard Lane junction, which would enable an 'all-red' pedestrian stage to be called so as to provide a break in southbound traffic flow to allow vehicles to turn right into Bredbury Park Way South. This issue could be dealt with by means of a suitable clause in a Section 106 Agreement which requires a detector to be provided in the event that such a queuing issue occurred (the need for this would be monitored over time as the development is implemented).

I note that Transport for Greater Manchester have raised some concern in respect to aspects of the VISSIM modelling, with them noting that the base model does not reflect existing levels of congestion that can be observed. They acknowledge, however, that the model has been validated and therefore they note that observed queues may be down to day-to-day flow variability and, as such, the predicted queues and delays may be greater than that predicted on certain days. As the VISSIM modelling is based on the floor area of the development that was originally proposed, as opposed to a floor area of 20% less, the predicted impact the impact of the development should be less than that predicted and the number of days where queues and delays may be greater than that predicted are likely to be less. In addition, the junction improvements also include pedestrian and cycle infrastructure which will improve the accessibility of the site and wider area, which, together with travel plan measures may help to further mitigate the impact of the development.

Although the VISSIM model has been the primary assessment tool for assessing the impact of the development on the local highway network, Transport for Greater Manchester (TfGM), who are responsible for the operation of traffic signals, requested that each individual signal-controlled junction was also assessed using LINSIG and Junctions (the industry standard software packages for assessing individual junctions). As such, the 9 junctions in the study area have also been assessed using LINSIG or Junctions, using flows from the VISSIM modelling. As with the VISSIM modelling, this assessment was carried out using the flows that were predicted to be generated by the original development, rather than the slightly smaller development that is now produced. TfGM have reviewed the LINSIG models, as well as the results of some sensitivity tests with an uplift in flows that were also carried out, and they have confirmed that the proposed amended junctions will work with some spare capacity. The modelling, however, does indicate that operation of the Stockport Road / Ashton Road junction will worsen slightly (albeit not significantly) and that queues may be slightly greater than those predicted by the VISSIM modelling. As such, the modelling of individual junctions that has been carried out does not change the conclusions reached from the review of the VISSIM modelling which were that the proposed mitigation measures will sufficiently mitigate the impact of the development on the local highway network.

In the event that the application was to be approved, I would recommend that any approval granted is subject to conditions requiring the detailed design and construction of the highway mitigation package, as well as measures to allow and encourage travel by sustainable modes so as to maximise the number of trips by sustainable modes of transport. This will include conditions relating to sustainable transport improvements, cycle parking and associated on-site facilities and the production and operation of a Travel Plan. The applicant will need to enter into Section 278 Agreements with Stockport Council, Highways England and Transport for Greater Manchester in respect to the implementation of the highway mitigation package. As the Transport Assessment has not assessed the development to take into account any phased delivery, the full highway mitigation package will need to be implemented prior to occupation of any part of the development.

Finally, the above comments relate to impact of the development on the highway network within the Borough of Stockport. As outlined above, it is estimated that 19% of light vehicle movements and 11-14% (AM) / 7-8% (PM) of HGV movements will be to / from the north (from Tameside). The TA has assessed the impact of these vehicle movements on one junction to the north of the site (the Stockport Road / Two Trees Lane signal controlled junction) using LINSIG. This outlines that the junction presently operates over capacity during the AM peak, with queuing on all 3 arms, and that the development will result in an increase in queues (of up to 7 vehicles). This, the TA outlines, is not considered material. I will, however, leave it for colleagues at Tameside MBC and TfGM to confirm whether they agree with this conclusion.

Highway Improvements

As outlined above, in order to mitigate the impact of the development, a highway mitigation package, has been development. In summary, this comprises of:

- 1) Upgrading and repositioning the existing Ashton Road / Bredbury Parkway (north) junction to form a signal-controlled junction
- 2) Upgrading the existing Ashton Road / Bredbury Parkway (south) junction through the provision of an extended right-turn ghost island (and improved pedestrian / cycle facilities)
- 3) Amending and signalising the Ashton Road roundabout junction,
- 4) Part-signalising the M60 Junction 25 roundabout through the introduction of signals on the northbound approaches from the M60 and Crookilley Way

Vehicle swept-path tracking diagrams have been submitted which demonstrate that HGVs would be able to negotiate each of the amended junctions and Stage 1 Road Safety Audits have been carried out for each of these junctions and a copy of these audits, together with Designer's Responses, have also been submitted. These have highlighted a number of issues with respect to the design of the junctions, although it is considered that these can be addressed as part of the detailed design (and it is noted that the designer has accepted the recommendations). Issues that will need to be reviewed and addressed include signal phasing, signage, visibility, vegetation, drainage, width of a hard shoulder on the M60 off-slip, provision of facilities for maintenance vehicles, location of service covers / gullies, carriageway and footway surfacing, lighting, provision of tactile / hazard paving and positioning of street furniture.

As outlined above, in the event that the application was to be approved, I would recommend that any approval granted is subject to conditions requiring the detailed design and construction of the highway mitigation package. The applicant will need to enter into Section 278 Agreements with Stockport Council, Highways England and Transport for Greater Manchester in respect to the implementation of the highway mitigation package.

Access

The development is proposed to be accessed via a new priority junction on Bredbury Parkway located approx. 200m to the east of its northern junction with Ashton Road. The junction will include a right-turn ghost lane on Bredbury Parkway and a two-lane exit from the new development. Footways and cycle tracks will be provided on both sides of the access, which will link to footways and cycle tracks to be provided along Bredbury Parkway (in both directions), and a pedestrian refuge will be provided to assist pedestrians crossing the proposed access road. A detailed layout of the access is included on drawing VN60707-D108 Rev B and vehicle swept-path tracking diagrams have been submitted which demonstrate that articulated HGVs would be able to turn into and out of the access. Modelling of the access outlines that it should operate in a satisfactory manner, with minimal queuing. I therefore consider the proposed access acceptable, subject to matters of detailed design, which can be dealt with by condition. The applicant will need to enter into Section 278 Agreement with Stockport Council, as Highway Authority, in respect to the construction of the site access, as well as associated highway works.

Parking

The TA outlines that car and cycle parking will be provided in accordance with the adopted parking standards. It also outlines that charging points will be provided for electric vehicles in accordance with the Council's policy requirements, together with ducting to enable additional charging points to be provided in the future.

In respect to the two units for which full planning permission is being sought, the following table outlines the proposed level of parking and how it relates to the adopted parking standards / Council guidance (bracketed figures are the adopted standards):

Unit	Car parking spaces	Disabled spaces	EV spaces	Cycles	Motorcycles
1	359 (603 max.)	18 (17 min.)	36 + 12* (47 min)	40 (39 min.)	0 (8 min.)
2	160 (269 max.)	8 (9 min.)	18 + 8* (21 min.)	20 (17 min.)	4 (4 min.)

* ducting to be provided, charging units to be provided in future

As outlined in the table, the overall level of car parking is within the maximum permitted and the level of parking for disabled badge holders and cycles is generally in accordance with the minimum standard. One additional space for disabled badge holders is required for Unit 2 and parking for motorcycles is also required for Unit 1. This, however, could be dealt with by condition. In order to encourage car sharing, it is recommend that parking spaces for car sharers are provided close to the entrances of each building. This can also be dealt with by condition, with the number determined as part of the Travel Plan process.

With respect to parking spaces with EV charging points, the TA outlines that 54 spaces (36 spaces for Unit 1 and 18 spaces for Unit 2) will have EV charging points provided upon occupation (equating to 10% of spaces) and an additional 20 spaces (12 for Unit 1 and 8 spaces for Unit 2) will have ducting to allow additional EV charging points to be provided in the future (equating to 14% of all spaces). Assuming a 2025 year of opening and having regard to likely demand, I would, however, recommend a larger number of EV units are provided from occupation (equating to 13% of spaces or 47 for Unit 1 and 21 for Unit 2). 10% of these should be suitable for disabled persons to use and 10% of the EV units should be rapid charge units (Mode 4, minimum 43kw). In addition, I recommend that ducting is provided to an additional number of spaces to as to allow additional charging units to be provided in the future as demand increases. This, however, could be dealt with by condition. In addition, consideration also need to be given for the need of additional charging points for commercial vehicles (e.g. vans / HGVs). The need for this will be depended on end-occupier and will need to have regard to the development of technology and the adoption of EVs over time. This, however, can be dealt with as part of the site's Travel Plan.

With respect to the layout and design of the parking facilities, I consider the layout of the car parks for Units 1 and 2 generally acceptable, as well as the location of the cycle parking for these units. I do, however, consider that cycle parking should be provided in fully secure cycle stores, rather than open-fronted shelters as illustrated in the Design and Access Statement. This, as well as other matters of detail, can be

dealt with by condition. Although only indicative layouts, the layouts for Units 3-7 are also considered generally acceptable. Motorcycle parking spaces and spaces with EV charging units, however, will need to be provided, I consider the location for the cycle parking for units 3, 6 and 7 needs to be reviewed (so it is closer to the building entrances) and pedestrian / cycle access routes in the sites need to be reviewed. These matters, however, can all be dealt with at reserved matters stage / by condition.

In addition to the provision of parking for the development, the scheme also includes the provision of a 32-space car park to the south-eastern end of the site, which would be for use by those attending Stockport Sports Village at Woodley. The Sports Village presently has approx. 246 parking spaces within its site but it is understood that this level of parking does not always meet demand, resulting in parking taking place on residential streets around the facility. The proposed car park therefore has the potential to reduce some of these parking issues. The original TA did not include any information to justify the number of parking spaces proposed therefore additional information was requested and subsequently submitted, in the form of a supplementary transport report titled 'Stockport Sports Village Trip Reassignment analysis'. This included information contained within a report produced in 2014 for Stockport Council on the operation of the Sports Village, which outlined that during the day on weekdays, parking demand is less than 100 cars but that demand rises quickly after 5pm, with capacity being exceeded (by approx. 50 cars) on some weekdays after 6.30pm before reducing after 7.30pm. Whilst the submitted report does not include details on demand on weekends, the 2014 report outlines that surveys carried out on weekends showed that demand did not exceed supply. The report also reviews where users of the Sports Village travel from and which would be the most convenient location to park, outlining that the proposed overflow car park would be more convenient for approx. 20% of users (e.g. those travelling from the Denton area). Based on this information, I would conclude a 32-space car park will help to address the current parking issue in respect to Stockport Sports Village, as it will be a more convenient car park to use for those travelling from the Denton area and provide additional off-street capacity during the early evening peak period. Whilst it may not fully address existing issues, it will provide benefits to the local area, reducing on-street parking in the vicinity of the Sports Village. Details of the car park, including when it is to be constructed, how it will be used and how users of the Sports Village will access it, will need to be agreed in conjunction with the operator of Sports Village. This, however, can be dealt with by condition. Details to be agreed will need to include how it will be laid out, drained, surfaced and lit, what facilities for the charging of electric vehicles would be provided and how it would be managed and maintained.

Servicing

The development is proposed to be served via a new access road, accessed from Bredbury Parkway, and this is designed so it would be suitable for use by a range of vehicles, including articulated HGVs. Service yards are proposed to be provided for each of the units, with room for both HGV parking and turning / manoeuvring and gate houses are proposed to be provided for the larger units, which would be set back from the highway to enable a number of HGVs to pull clear of the highway before reaching the gatehouse. The Design and Access Statement outlines that

secure and screened refuse storage facilities will be provided in each service yard and a Site Waste Management Plan (SWMP) would be produced to outline how waste will be managed and disposed of. The location of the bin stores for Units 1 and 2 are shown on the submitted plans.

These proposed servicing arrangements are considered acceptable, in principle, although full details of the service yards, including how they will be surfaced, drained and illuminated, will need to be agreed. This, however, can be dealt with by condition. As part of any reserved matters applications for the part of the site which the applicant is seeking outline permission for, the applicant will need to demonstrate that all plots within this part of the site will be able to be accessed and serviced in a safe and practical manner. This will need to include the submission of detailed site layouts, showing service yards, the accesses to them, service doors, refuse stores, waste compactors, skips etc., and vehicle swept-path tracking diagrams that demonstrate that rigid and articulated HGVs will be able to service each plot.

Accessibility

The TA outlines that the site is within reasonable walking distance of parts of Bredbury, Brinnington, Woodley and Haughton Green, there are a number of public rights of way within and close to the site and that pedestrian infrastructure in the area is generally of good standard, with all local roads benefitting from street lighting and various controlled and uncontrolled crossings provided on Ashton Road. It also outlines that a reasonably large residential population is within reasonable cycling distance of the site, with Stockport Town Centre, Hyde, Denton, Romiley, Brinnington, Bredbury and Woodley all within a 5km ride from the site. In addition, it outlines that National Cycle Network Route 62 runs to the north of the site and there are various other on and off carriageway cycle routes in the area.

With respect to accessibility by public transport, the TA outlines that 3 bus services travel along Ashton Road, linking the site with Stockport and Denton. Two operate during the day and 1 in the evening. Whilst the nearest northbound bus is within 200m of the site access, the nearest southbound stop is approx. 470m away. It also outlines that the frequent 330 bus service, which links Stockport with Ashton, Dukinfield and Hyde travels along Hyde Road, stops approx. 1km from the site (via Mill Lane). Whilst the TA notes the walking distance to these stop is greater than recommended, it outlines that as the service is frequent, some people may be willing to use this service. Finally, the TA outlines that the site is approx. 1.5km from both Brinnington and Woodley Stations and, although, these are beyond the recommended distance for commuting purposes, it notes that they would enable people to travel to the site from places such as Manchester, New Mills and Marple within 45 minutes to 1 hour.

It does, however, outline that there are some routes which are sub-standard in parts or locations where suitable crossings are not provided. This includes narrow or overgrown footways and paths, lack of lighting, poorly surfaced paths and lack of dropped kerbs and tactile paving at crossing points. Various improvements are therefore proposed as part of the development so as to address these issues and improve the site's accessibility. These include:

- 1) New and improved footways / cycle tracks on Bredbury Parkway between the site access and Ashton Road, together with a crossing point
- 2) A new shared footway / cycleway along Bredbury Parkway between the site access and its southern junction with Ashton Road
- 3) New / improved off-carriageway cycle facilities at the Ashton Road / Bredbury Parkway South junction
- 4) New TOUCAN crossings at the Ashton Road roundabout
- 5) Controlled crossing facilities at the Ashton Road / Bredbury Parkway North junction
- 6) A cycle track on the southbound / uphill approach to the Ashton Road / Bredbury Parkway North
- 7) A pedestrian refuge on Ashton Road (to assist pedestrians crossing between public footpaths 46BR and 68BR)
- 8) New / improved bus stops on Ashton Road
- 9) New / improved footways / cycle tracks on Ashton Road, including provision of a continuous off-carriageway cycle route between Cromwell Road and Bredbury Parkway North
- 10) The provision of new lighting on the M60 footbridge over which runs public footpath 43BR to Brinnington, together with access improvements
- 11) Improvements to public footpath 50BR between the site and Mill Lane
- 12) A new section of footway to the northern end of Mill Lane (west side)
- 13) Pedestrian improvements on Mill Lane, including the provision of uncontrolled pedestrian crossings and pedestrian improvements at the Rodney Drive junction
- 14) Pedestrian and cycle links into the site from the south and the north (connecting to Turner Lane in two locations)
- 15) Improvements to public rights of way within the site (some along new lines)
- 16) Rerouting and improving Turner Lane (designated a 'Quiet Lane' by the UDP Review) to the north / east of the site (for use by pedestrians, cyclists and horse riders)
- 17) New / upgraded pedestrian cycle path to Arden Bridge (along 64(a)BR) and on to Haughton Green

These are designed to improve pedestrian and cycle access to Brinnington, Woodley, Bredbury and Haughton Green, as well as access to nearby bus stops. The proposed new and improved bus stops on Ashton Road are intended to ensure that the site is better served by public transport. They have been developed following detailed discussions with this department.

With respect to phasing of these works, whilst the applicant is proposing to deliver many of these improvements as part of the initial phase of the development (construction of Units 1 and 2), they are proposing to implement the cycleway along Bredbury Parkway between the site access and its southern junction with Ashton Road, the Haughton Green improvements and works to the south-western end of Turner Lane as part of the second phase of the development.

Consideration of these improvements concludes that they should ensure that the site will connect into the existing pedestrian and cycle network and that staff and visitors will be able to access the site by foot and cycle from various locations. In addition, provision of off-carriageway cycle facilities should improve the safety for cyclists

(notably less confident and more vulnerable cyclists) and some of the infrastructure provided will allow and encourage walking and cycling on less polluted and trafficked routes. The improvements will also improve the overall level of accessibility in the area, which will allow and encourage more use of sustainable modes of transport which could help to mitigate the impact of the development.

During discussions with the developer, however, it was highlighted that other improvements should be considered to maximise sustainable access, including improving Arden Road (to the north of the site), providing an off-road pedestrian / cycle path through the open space to the south of the site and along to Stockport Road, improving pedestrian access to Woodley Station and carrying out improvements on Lingard Lane. The developer, however, has outlined that delivery of all these measures would affect the viability of the development (notably since the development has been reduced in scale). Such an argument is accepted. As such, and noting that it is considered that the measures tabled are considered to be those which should be most beneficial in ensuring the site is accessible, I would accept, in general, the proposed package of measures.

I do, however, consider that, in addition, to the measures proposed, some additional street lighting and wayfinding signage should be provided on Arden Road / Turner Lane, to assist pedestrian / cycle access from the north. In addition, whilst I do not consider the requirement to provide an off-road pedestrian / cycle path through the open space to the south of the site can be justified, its provision at a later date would be beneficial and would further improve the site's accessibility. As such, in the event that the application was to be approved, I would recommend that any approval granted is subject to a Section 106 relating to the payment of a financial contribution to funding lighting / signage on Arden Road / Turner Lane and to reserve a route in the landscaped area to the south-east side of Unit 7 to allow the Council to provide a cycle route through this area (and then south) in the future.

With respect to public transport, the site could not be regarded as being highly accessible by public transport, due to the proximity of bus stops and train stations in relation to the site and the routing and frequency of services in the area. The provision of a new bus stop closer to the site and improvements to pedestrian and cycle routes between the site and nearby bus stops and train stations will improve the site's public transport accessibility but trips by public transport would likely remain reasonable low compared with many other sites. Addressing this would require significant investment (e.g. new bus services), which the development would not be able to sustain unless other measures (e.g. pedestrian and cycle improvements) were not implemented. I would, however, conclude that improvements in pedestrian and cycling infrastructure would more likely result in people carrying out trips using sustainable transport and, as such, I would not put an argument forward for improving public transport services. I do, however, recommend that the Travel Plan includes measures to encourage the use of public transport (e.g. encouraging people to travel by train and then cycle from the station).

Finally, with respect to detail and delivery of the sustainable transport improvements, these will also need to be worked up at detailed design stage, with the schemes complying with both local and national design standards, including LTN 1/20. Infrastructure will also need to be constructed to the Council's design standards and

specifications (including surfacing of public rights of way and other paths). It should also be noted that certain elements of the improvements (e.g. all the elements of the improved route from Brinnington) are not detailed in the TA. The requirement to implement the majority of the improvements can be dealt with by condition (with conditions detailing exactly what is required) and the applicant will need to enter into Section 278 Agreements with Stockport Council (and TfGM in respect to the improvements that have controlled crossings) with respect to the construction of all improvements on the public highway. New paths within the site will need to be delivered by means of a Section 38 Agreement. With respect to timing, noting the scale of improvements to be carried out, I do consider it reasonable for these to be phased, with the implementation of some delayed until Phase 2 of the development is occupied. As such, and taking into account what parts of the site will be developed first and the fact that some improvements are linked with the main highway works, I consider the phasing suggested by the applicant acceptable (although a section of cycle track on Bredbury Parkway to the south of the access will need to be constructed as part of the works to construct the access).

Travel Plan

Alongside the physical improvements proposed to be carried out to allow and encourage staff and visitors to travel to the site by foot, cycle and public transport, a Framework Travel Plan (FTP) has been produced, which outlines various measures and initiatives that will be implemented to increase awareness of, and encourage the use of, sustainable travel modes. Measures include creating a site website with travel information, offering personalised travel planning advice to staff, providing cycle parking and shower / changing facilities and promoting car sharing, flexible working and Cycle to Work cycle purchase schemes. The FTP also includes details of how final Travel Plans will be produced (using TfGM's online travel plan toolkit), some details of how they will be managed and how surveys will be carried out.

The TPT, however, assumes that reserved matters applications will be required for each plot (which would not be the case for Plots 1 and 2) and therefore a mechanism for production of subsidiary plans for these two plots is required. In addition, I consider that other measures should be implemented, such as providing travel information packs for staff, providing parking spaces for car sharers in priority locations, promoting the use of travel apps, having walking / cycling user groups, promoting sustainable travel days, such as national Cycle to Work Day and promoting sustainable travel via staff e-mail, social media and staff intranets. In addition, I consider that the travel plan should also include details on car park management, charging of electric vehicles and e-bikes, business travel, freight operations, charging infrastructure for commercial vehicles and, if businesses will be working 24/7 or long shifts, how travel for staff arriving or departing at non-standard times will be managed. With respect to reviewing the operation of the plan, it is considered that the plan also needs to have detailed and robust targets and objectives and proposals for remedial action if targets are not being met. With respect to surveys, I also consider that car parking surveys should be carried out, together with 24 hour travel surveys (noting that the traffic generation of B2 and B8 uses can be spread throughout the day).

These matters, however, can all be addressed as part of the development of the travel plans for the site. Due to the scale and nature of the site, I would consider it appropriate for:

- 1) A Framework Travel Plan to be produced for the whole site (which could be a development of the submitted plan with the issues outlined above addressed)
- 2) Subsidiary Travel Plans to be produced for each unit (or group of small units)

The requirement to do this can be secured by condition. Noting that it will be important for the Travel Plans to be properly reviewed and revised if targets and objectives are not being met, there will be a need for the Travel Plans to be properly reviewed by the Local Authority. As such, I would recommend that any approval granted is subject to a Section 106 Agreement relating to the payment of a fee to cover the Council's costs of monitoring the Travel Plan.

Finally, although the FTP outlines that showers, changing facilities and lockers will be provided throughout the site, I note that these are not indicated on the floor plans for Plots 1 and 2. This therefore needs to be addressed. This matter, however, can be dealt with by condition.

Design / site layout

The planning application is a hybrid application, with full planning consent being sought for the site access, the majority of the site access roads, two employment units and associated infrastructure (e.g. parking, service yards etc.) and landscaping, and outline consent being sought for the remainder of the site. Since the application has been submitted, various amendments have been made to the site layout and therefore my comments are based on drawing B9269-AEW-XX-XX-DR-A-0513 Rev P7 'Proposed Masterplan'. This shows both the area of the site which full planning consent is being sought and the area of the site which outline planning consent is being sought. It is noted and accepted that the layout within the parts of the site for which only outline consent is being sought is only indicative and may therefore be subject to change (unless elements are conditioned). A supplementary drawing, B9269-AEW-XX-XX-DR-A-0030 Rev P3 'Rights of Way Strategy' has also been submitted, which shows the existing public rights of way within the site and proposed new and diverted rights of way overlaid on the proposed layout plan.

In summary, the following is proposed:

- 1) The development would be accessed via a 7.3m wide access road (with localised widening), with a 2m wide footway on one side and a 2m wide footway and a 3m wide cycle track on the other side, accessed from a new junction on Bredbury Parkway
- 2) New pedestrian and cycle paths would be provided into the site from the south east and north-east (from two points on Turner Lane)
- 3) Each of the units would be served via accesses that would take access from the proposed access road. Pedestrian / cycle crossings would be provided at each access
- 4) Car parks and service yards would be provided for each unit

- 5) Turner Lane (an existing unregistered public right of way) which runs through the north-eastern part of the site would be diverted, running through the landscaped corridor to be provided along the site's north-eastern boundary
- 6) A 32-space car park would be provided to the south-eastern end of the site for use by those attending Stockport Sports Village (located to the west of the site)
- 7) A number of public rights of way within the site (46BR, 47BR, 48BR and 49BR) would be diverted (within landscape corridors or along the proposed access roads)
- 8) New public footpaths would be provided to the north and south east of the site, which would link up existing public rights of way and form a circular footpath around the site boundary.

Vehicle swept-path tracking diagrams have been submitted (within the Transport Assessment and in subsequent submissions), which demonstrate that articulated HGVs would be able to negotiate the main site access road.

A Stage 1 Road Safety Audit (RSA) has have been carried for the site access road and a copy of this audits, together with Designer's Response, has been submitted. Whilst this has highlighted a number of issues, these all relate to matters of detailed design and can therefore be addressed at detailed design stage.

A review of the layout, which has been developed following discussions with this department, in conjunction with the vehicle swept-path tracking diagrams and RSA, concludes that, subject to detail, it should enable the development to be accessed and serviced in a safe and practical manner by pedestrians, cyclists, cars and HGVs. The layout of the main access road accords with the Council's design standards and the cycle facilities on the access road, as well at the site access, accord with current national guidance on the design of cycle facilities (LTN 1/20). If the access road is constructed in phases and its first phase terminates at the Phase 1/2 boundary, however, a sub-standard turning area will be provided by the access to the service yard to Unit 1. As such, the road will need to extend a few metres past the Phase 1/2 boundary in this location. In addition, I consider the transition points between the existing and diverted route of Turner Lane need to be "smoothed out" so as to avoid sharp changes in direction. These matters, however, can be dealt with by condition / at detailed design stage.

In order to ensure that the site access road functions in a safe and practical manner and access is not compromised it is considered that parking restrictions should be provided on, at least, some sections of the road. This matter, however, can all be dealt with by condition / as part of the Section 38 Agreement for the access road (noting that the access road will replace existing public rights of way and having regard to the scale and nature of the development, it is considered that the access road should be adopted as public highway).

As outlined above, the scheme will require a number of existing public rights of way within the site to be diverted and the scheme includes the proposals to provide a number of new and replacement paths within the site. Subject to the paths being constructed to a suitable standard, I would consider the new network of paths that will be provided will provide a reasonable alternative to the existing network, would

enable the each of the units within the development to be accessed and would be suitable for use for both recreation and commuting.

Finally, with respect to the part of the site for which outline consent is being sought, although I consider the indicative layout generally acceptable, I consider the design of the access road that will serve the car park to Unit 6 and the Sports Village car park and adjacent cycle path needs to be reviewed slightly and consider that all units within the outline part of the site should be served by paths suitable for cycles, as well as pedestrians. As these issues relate to parts of the development which for which only outline consent is being sought, these issues can be addressed at a later stage (reserved matters / by condition). Full details of the access road, paths, parking areas and service yards will need to be agreed and therefore I would recommend that any approval granted is subject to conditions relating to the agreeing details of the access roads, paths, parking facilities and service yards.

Construction

The Highways Section of the Environment Statement outlines that a Construction Environmental Management Plan (CEMP) would be prepared for the development, which would include details on HGV movements during the construction phase, the management of construction traffic, wheel washing, transportation of plant to the site etc. Whilst construction of the development (and associated highway works) will have some impact on the local highway network, providing suitable arrangements are put in place to minimise and mitigate the impact, I would conclude that construction of the development should not have a significantly adverse impact on the local highway network.

I also note that the Mineral Resource Assessment outlines that there are no minerals on the site that would be commercially viable to extract and therefore HGV movements would not be generated from the removal of minerals prior to the commencement of the main development. The "Cross sections through site" drawing, however, outlines that the development will require a fair amount ground remodelling, with the sections on the drawing indicating that there will be both cut and fill operations on the site. The applicant, however, has confirmed that there would be no surplus material generated from these operations that would need to be removed from the site, other than peat. Although there is a potential for some of the peat to be used in the landscaping areas, if all of this does need to be removed from site, this would equate to 648 HGV trips (worse case). Even if all this peat would need to be removed, the applicant has outlined that this would be done on a phased basis over a period of around 6 months, which would equate to around 4 trips a day. Providing such an operation was carried out over such a period (which could be controlled and managed as part of the CEMP), the impact of such an operation on the highway network would not be material. I would nevertheless recommend that the scheme is developed with the aim of retaining as much peat on the site as possible so as to minimise vehicle movements generated by such an operation. The production, approval and implementation of a CEMP can be dealt with by condition. As the development is to be phased, separate CEMPs will be required for each phase of the development.

Conclusion

This application, seeking permission for the extension of Bredbury Industrial Estate, has been subject to detailed assessment by the Local Highway Authority (Stockport Council), in conjunction with colleagues from Highways England and Transport for Greater Manchester. Detailed and extensive discussions have taken place with the applicant's consultants in respect to the development of a traffic model to assess the impact of the development on the local highway network (including the M60 through Bredbury), development of a highways mitigation scheme (which includes junction and other improvements), development of a package of measures to enable the development to be accessed by all modes of transport and improve sustainable transport in the area and development of a site layout which accords with local and national design standards, guidance and policy.

A review of the VISSIM traffic modelling concludes that the proposed highway mitigation measures will sufficiently mitigate the impact of the development and it is considered that, subject to matters of detailed design, the proposed highway mitigation scheme and the site's access arrangements are acceptable. The proposed level of parking is generally in line with the adopted parking standards and full details of parking can be dealt with by condition. The scheme also include proposals to provide a 32-space car park aimed at helping to address the current parking issues in respect to Stockport Sports Village. This will be a more convenient car park to use for those travelling from the Denton area, providing additional off-street capacity during the early evening peak period and will therefore provide benefits to the local area. Various improvements are proposed as part of the development so as to improve the site's accessibility. These should ensure that the site will be able to be accessed by sustainable modes of transport and will also improve the overall level of accessibility in the area, which allow and encourage more use of sustainable modes of transport in the area which could help to further mitigate the impact of the development. As with all schemes, there will be a need to agree details of the scheme, as well as ensure that the development is constructed in a manner that minimises its impact on the local highway network (by means of a Construction Environmental Management Plan) and sustainable travel is encouraged (by means of a Travel Plan). This, however, can be dealt with by condition / Section 106 Agreement.

As such, subject to conditions and the applicant entering into a Section 106 Agreement, I would conclude that the development will accord with local and national transport policies, including those in the NPPF and the Stockport Core Strategy DPD, as well as local and national design advice and guidance, and therefore I raise no objection to the application.

Recommendation: No objection subject to conditions and the applicant entering into a Section 106 Agreement in respect to:

- 1) The requirement to provide a queue loop detector at the Ashton Road / Bredbury Parkway South junction in the event that future monitoring shows that traffic queues extend back to the Ashton Road roundabout**
- 2) The payment of a financial contribution to fund street lighting / signage on Arden Road / Turner Lane**

- 3) **The reservation of a route in the landscaped area to the south-east side of Unit 7 to allow the Council to provide a cycle route through this area (and then south) in the future.**
- 4) **The payment of a financial contribution to cover the Council's costs of monitoring the Travel Plan/s for the site.**

Transport for Greater Manchester

Highways Overview

Colleagues from within TfGM HFAS (Highways Forecasting Analytical Services) and TfGM UTC (Urban Traffic Control) have reviewed the highways information issued in support of the proposed industrial development and have provided comments in respect of the highway section. The comments provided are listed below.

The proposed development has been reduced by 20% compared with the previous proposals. No additional assessments and modelling have been undertaken.

Whilst the model validation reports provided suggest that the VISSIM model validates well against WebTag validation criteria (confirmed by an HE review), TfGM have some concerns that the base year validated VISSIM model appears to run with little or no real congestion, compared to our knowledge of network operation in this area, suggesting that there may be too little traffic in it, or that vehicle operating / behaviour parameters may be a little optimistic.

Based on our experience with the existing operation of the network in this area during the morning peak, we would expect to see queues and congestion from the motorway through the roundabouts into Bredbury. The flows on the motorway and hence on the road that joins the motorway appear to be free running in the model. In reality, this is congested (slow moving / queued) during the morning peak. During the evening peak we would expect to see queues and congestion from Bredbury towards the motorway. The VISSIM outputs do not appear to show this. Given this, we have some concerns that the scenarios with the proposed changes in Bredbury do not fully reflect the potential impacts correctly.

Clearly, given that the models have been shown to replicate the observed flows and the average journey times accurately, we appreciate that it is difficult to argue that the models are not a reasonable representation of observed operation. However, we are less certain about how well the model replicates the observed range of network performance in the area caused by day-to-day flow variability, which could mean that on a significant number of occasions, network operation is considerably worse than shown by the model.

TfGM can confirm that the LINSIG models have been agreed and that further sensitivity tests with an uplift in flows have been done. The results of the highway assessment appear to suggest that the junctions will work with some spare capacity.

TfGM still have some concerns that the roundabout is too small and hasn't been

tested with a full range of different flow conditions but as TfGM are not the highway authority the acceptability of the proposed design is not ours to make.

Highways England

Referring to the planning application referenced above, dated 30 September 2019, for an outline application with all matters reserved, proposing the creation of a commercial/industrial development providing up to 116,129 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, 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, roads, parking, footpaths, internal landscaping and the provision of a car park to serve Stockport Sports Village), notice is hereby given that Highways England's formal recommendation is that we:

Recommend that conditions should be attached to any planning permission that may be granted

As such, Highways England recommends the following planning conditions are placed on this application:

1. No development pursuant to this planning permission, except site clearance, remediation and ground remodelling, shall commence unless and until the developer has submitted full design and construction details, including all geotechnical and structural design requirements, of the required improvements to M60 Junction 25 and surrounding local roads, as outlined in the following drawings:

- Vectos drawing VN60707-D122 Rev C (Ashton Road / Bredbury Park Way North Proposed Signalised Junction (Option 2));
- Vectos drawing VN60707/D118 Rev D (Ashton Road / Bredbury Park Way South Proposed Signalised Junction);
- Vectos drawing VN60707/D115 Rev F (A560 Crookilley Way / Ashton Road Roundabout Improvements); and,
- Vectos drawing VN60707/D116 Rev D (M60 Junction 25 (A560 Crookilley Way Roundabout) Proposed (Part) Junction Signalisation).

Such details are to be agreed in writing by the local planning authority, in consultation with Highways England. The details to be submitted shall include:

- How the scheme interfaces with the existing highway alignment, details of the carriageway markings and lane destinations;
- Full signing and lighting details;
- Confirmation of full compliance with current Departmental Standards (DMRB) and Policies (or approved relaxations/departures from standards);
- A phasing scheme for the implementation of the improvements; and,
- An independent Stage Two Road Safety Audit (taking account of the Stage One Road Safety Audit recommendations) carried out in accordance with current Departmental Standards (DMRB) and Advice Notes.

Reason: To minimise the queuing impact of additional traffic generated by this development, and to ensure the continued safe operation of the Strategic Road Network.

2. No development shall be brought into use, unless and until the highway improvements, identified in condition 1 above, have been implemented to the satisfaction of the local planning authority in consultation with Highways England.

Reason: To ensure that the works to mitigate the impact of the development on the Strategic Road Network are completed satisfactorily prior to occupation of the developed site.

3. No development pursuant to this planning permission shall be occupied until a detailed Travel Plan has been submitted and approved in writing by the Local Planning Authority, in consultation with Highways England. The Travel Plan shall be developed in accordance with the Framework Travel Plan document produced by Vectos, dated February 2020. The Travel Plan as approved shall be implemented in full upon occupation of any one building and shall thereafter monitored in accordance with the approved Travel Plan.

Reason: To ensure that the proposals outlined in the Framework Travel Plan document have been implemented sufficiently to assist in the mitigation of the development's traffic impact.

This response represents our formal recommendations with regard planning application DC/074399 and has been prepared by Adam Johnson, Spatial Planner.

United Utilities

Drainage

Following our review of the submitted Drainage Strategy, we can confirm the proposals are acceptable in principle to United Utilities and therefore should planning permission be granted we request the following condition is attached to any subsequent Decision Notice:

Condition 1 – Surface Water

The drainage for the development hereby approved, shall be carried out in accordance with principles set out in the submitted Drainage Strategy Re w10658-181120-drainage Strategy which was prepared by Waterco. For the avoidance of doubt and unless otherwise agreed in writing by the Local Planning Authority, surface water must drain at the restricted rate of 160 l/s. The development shall be completed in accordance with the approved details.

Reason: To ensure a satisfactory form of development and to prevent an undue increase in surface water run-off and to reduce the risk of flooding

Condition 2 – Foul water

Foul and surface water shall be drained on separate systems.

Reason: To secure proper drainage and to manage the risk of flooding and pollution.

The applicant can discuss any of the above with Developer Engineer, Neil O'Brien, by email at wastewaterdeveloperservices@uuplc.co.uk.

Please note, United Utilities are not responsible for advising on rates of discharge to the local watercourse system. This is a matter for discussion with the Lead Local

Flood Authority and / or the Environment Agency (if the watercourse is classified as main river).

If the applicant intends to offer wastewater assets forward for adoption by United Utilities, the proposed detailed design will be subject to a technical appraisal by an Adoptions Engineer as we need to be sure that the proposal meets the requirements of Sewers for Adoption and United Utilities' Asset Standards. The detailed layout should be prepared with consideration of what is necessary to secure a development to an adoptable standard. This is important as drainage design can be a key determining factor of site levels and layout. The proposed design should give consideration to long term operability and give United Utilities a cost effective proposal for the life of the assets. Therefore, should this application be approved and the applicant wishes to progress a Section 104 agreement, we strongly recommend that no construction commences until the detailed drainage design, submitted as part of the Section 104 agreement, has been assessed and accepted in writing by United Utilities. Any works carried out prior to the technical assessment being approved is done entirely at the developers own risk and could be subject to change.

Management and Maintenance of Sustainable Drainage Systems

Without effective management and maintenance, sustainable drainage systems can fail or become ineffective. As a provider of wastewater services, we believe we have a duty to advise the Local Planning Authority of this potential risk to ensure the longevity of the surface water drainage system and the service it provides to people. We also wish to minimise the risk of a sustainable drainage system having a detrimental impact on the public sewer network should the two systems interact.

We therefore recommend the Local Planning Authority include a condition in their Decision Notice regarding a management and maintenance regime for any sustainable drainage system that is included as part of the proposed development. For schemes of 10 or more units and other major development, we recommend the Local Planning Authority consults with the Lead Local Flood Authority regarding the exact wording of any condition.

You may find the below a useful example:

Prior to occupation of the development a sustainable drainage management and maintenance plan for the lifetime of the development shall be submitted to the local planning authority and agreed in writing. The sustainable drainage management and maintenance plan shall include as a minimum:

- a. Arrangements for adoption by an appropriate public body or statutory undertaker, or, management and maintenance by a resident's management company; and*
- b. Arrangements for inspection and ongoing maintenance of all elements of the sustainable drainage system to secure the operation of the surface water drainage scheme throughout its lifetime.*

The development shall subsequently be completed, maintained and managed in accordance with the approved plan.

Reason: To ensure that management arrangements are in place for the sustainable drainage system in order to manage the risk of flooding and pollution during the lifetime of the development.

Please note United Utilities cannot provide comment on the management and maintenance of an asset that is owned by a third party management and maintenance company. We would not be involved in the discharge of the management and maintenance condition in these circumstances.

Water Supply

United Utilities can readily supply water for domestic purposes, but for larger quantities for example, commercial/industrial we will need further information. The applicant must undertake a complete soil survey, as and when land proposals have progressed to a scheme design i.e. development, and results submitted along with an application for water. This will aid in our design of future pipework and materials to eliminate the risk of contamination to the local water supply.

Although water supply in the area is compliant with current regulatory standards, we recommend the applicant provides water storage of 24 hours capacity to guarantee an adequate and constant supply.

If the applicant intends to obtain a water supply from United Utilities for the proposed development, we strongly recommend they engage with us at the earliest opportunity. If reinforcement of the water network is required to meet the demand, this could be a significant project and the design and construction period should be accounted for.

To discuss a potential water supply or any of the water comments detailed above, the applicant can contact the team at DeveloperServicesWater@uuplc.co.uk. Please note, all internal pipework must comply with current Water Supply (water fittings) Regulations 1999.

United Utilities' Property, Assets and Infrastructure

According to our records there is an easement crossing the proposed development site which is in addition to our statutory rights for inspection, maintenance and repair. The easement dated 22/03/1937 UU Ref: Z522 has restrictive covenants that must be adhered to. It is the responsibility of the developer to obtain a copy of the document, available from United Utilities Legal Services or Land Registry and to comply to the provisions stated within the document. Under no circumstances should anything be stored, planted or erected on the easement width. Nor should anything occur that may affect the integrity of the pipe or United Utilities legal right to 24 hour access.

We recommend the applicant contacts our Property Services team to discuss how the proposals may interact with the easement. They should contact PropertyGeneralEnquiries@uuplc.co.uk

A water main crosses the site. As we need unrestricted access for operating and maintaining it, we will not permit development over or in close proximity to the main. We require an access strip as detailed in our 'Standard Conditions for Works Adjacent to Pipelines', a copy of which is enclosed.

The applicant must comply with our 'Standard Conditions' document. This should be taken into account in the final site layout, or a diversion may be necessary. Unless there is specific provision within the title of the property or an associated easement, any necessary disconnection or diversion required as a result of any development will be at the applicant's expense. If considering a water mains diversion, the applicant should contact United Utilities at their earliest opportunity as they may find that the cost of mains diversion is prohibitive in the context of their development scheme.

The Water Industry Act 1991 affords United Utilities specific rights in relation to the maintenance, repair, access and protection of our water infrastructure;

- Sections 158 & 159, outlines the right to inspect, maintain, adjust, repair or alter our mains. This includes carrying out any works incidental to any of those purposes. Service pipes are not our property and we have no record of them.
- Under Section 174 of the Act it is an offence to intentionally or negligently interfere with any resource main or water main that causes damage to or has an effect on its use or operation.

It is in accordance with this statutory provision that we provide standard conditions to assist developers when working in close proximity to our water mains.

Both during and post construction, there should be no additional load bearing capacity on the main without prior agreement from United Utilities. This would include earth movement and the transport and position of construction equipment and vehicles.

A public sewer crosses this site and we may not permit building over it. We will require an access strip width of six metres, three metres either side of the centre line of the sewer which is in accordance with the minimum distances specified in the current issue of "Sewers for Adoption", for maintenance or replacement. Therefore a modification of the site layout, or a diversion of the affected public sewer at the applicant's expense, may be necessary. To establish if a sewer diversion is feasible, the applicant must discuss this at an early stage with our Developer Engineer at wastewaterdeveloperservices@uuplc.co.uk as a lengthy lead in period may be required if a sewer diversion proves to be acceptable. Deep rooted shrubs and trees should not be planted in the vicinity of the public sewer and overflow systems. Where United Utilities' assets exist, the level of cover to the water mains and public sewers must not be compromised either during or after construction.

For advice regarding protection of United Utilities assets, the applicant should contact the teams as follows:

Water assets – DeveloperServicesWater@uuplc.co.uk

Wastewater assets – WastewaterDeveloperServices@uuplc.co.uk

It is the applicant's responsibility to investigate the possibility of any United Utilities' assets potentially impacted by their proposals and to demonstrate the exact relationship between any United Utilities' assets and the proposed development.

A number of providers offer a paid for mapping service including United Utilities. To find out how to purchase a sewer and water plan from United Utilities, please visit the Property Searches website;
<https://www.unitedutilities.com/property-searches/>

You can also view the plans for free. To make an appointment to view our sewer records at your local authority please contact them direct, alternatively if you wish to view the water and the sewer records at our Lingley Mere offices based in Warrington please ring 0370 751 0101 to book an appointment.

Due to the public sewer transfer in 2011, not all sewers are currently shown on the statutory sewer records and we do not always show private pipes on our plans. If a sewer is discovered during construction; please contact a Building Control Body to discuss the matter further.

SMBC Drainage Engineer/Local Lead Flood Authority

Based on the submitted evidence the LLFA raises no objection subject to the following conditions and informative:

1. Units 1 and 2

Notwithstanding the approved plans and before development of Units 1 and Unit 2 commences, a detailed surface water drainage scheme that prioritises the use of the most sustainable surface water drainage systems based on the findings of a detailed ground investigation shall be submitted to and approved in writing by the local planning authority. The scheme shall include a timetable for implementation; take account of advice received from the Council as lead local flood authority and other relevant agencies and providers; satisfy the flow regimes and run-off rates set out in Policy SD-6 of the Stockport Core Strategy DPD; include maintenance arrangements to ensure an acceptable standard of operation for the lifetime of the development and where possible provide multifunctional benefits.

The drainage scheme should confirm / incorporate as a minimum:

- Final outfall arrangements to a water body, watercourse, public surface water sewer or infiltration to ground, for all discharges from the development;
- incorporate SuDS and be based on the hierarchy of drainage options in the National Planning Practice Guidance with evidence of an assessment of the site conditions;
- Details of proposed attenuation including volumes and drain down times; and,
- Detailed design of the fully integrated drainage system.

The approved scheme shall be implemented in full in accordance with the approved timetable for implementation.

2. Outline

Notwithstanding the approved plans and before development of the 'outline element' commences, a detailed surface water drainage scheme that prioritises the use of the most sustainable surface water drainage systems based on the findings of a detailed ground investigation shall be submitted to and approved in

writing by the local planning authority. The scheme shall include a timetable for implementation; take account of advice received from the Council as lead local flood authority and other relevant agencies and providers; satisfy the flow regimes and run-off rates set out in Policy SD-6 of the Stockport Core Strategy DPD; include maintenance arrangements to ensure an acceptable standard of operation for the lifetime of the development and where possible provide multifunctional benefits.

The drainage scheme should confirm / incorporate as a minimum:

- Conveyance and final outfall arrangements to a water body, watercourse, public surface water sewer or infiltration to ground, for all discharges from the development;
- incorporate SuDS and be based on the hierarchy of drainage options in the National Planning Practice Guidance with evidence of an assessment of the site conditions including:
 - a. Highways / access roads;
 - b. Development parcels;
 - c. Landscaped areas;
- Details of proposed attenuation including volumes and drain down times;
- Details for management of infrastructure including preliminary discussions / agreements in principle with any adopting / controlling bodies; and,
- Details for the proposed public sewer diversion together with discussions / agreements with the asset owner.

The approved scheme shall be implemented in full in accordance with the approved timetable for implementation.

Informative Note:

It should be noted that any future application to discharge conditions above relating to surface water drainage and the application of the SuDS hierarchy will need to demonstrate a comprehensive approach to the surface water strategy for those parts of the site that the full and outline permissions pertain too. Therefore, partial discharge of these conditions may not be possible, or may only be possible where this comprehensive approach to that part of the site (full or outline) can be demonstrated. This is particularly the case in the outline part of the site where if individual units are brought forward at different times it will need to be demonstrated that a comprehensive approach to surface water drainage and the SuDS hierarchy has been taken.

Environment Agency

Our previous comments of 27 July 2020 still apply.

27 July 2020 comments

We have reviewed the following reports in terms of the risk to controlled waters and

- PHASE I GEO-ENVIRONMENTAL SITE ASSESSMENT for Land off Ashton Road Bredbury Stockport SK6 2RY Prepared by E3P for Quorum Estates Report Ref: 11-363-r1 Date Issued: August 2016

- PHASE II GEO-ENVIRONMENTAL SITE ASSESSMENT for Land off Ashton Road Bredbury Stockport SK6 2RY Prepared by E3P for Quorum Estates Report Ref: 11-363-R4 Date Issued: January 2018
- Email Tue 26/05/2020 14:52 Environmental sampling explanation
- Email Tue 07/07/2020 12:11 including trial pit photos

Environment Agency position

We are satisfied with the conclusions in the PHASE II GEO-ENVIRONMENTAL SITE ASSESSMENT Report Ref: 11-363-R4 Date Issued: January 2018 for Land off Ashton Road Bredbury. Note: the ground investigation supplied does not cover the full area submitted as the location plan for the application.

The area listed as Turner Lane No.2 land fill containing an in filled reservoir has not been investigated. This area should be subject to an intrusive ground investigation before built development is undertaken.

The previous use of the proposed development site as Bredbury Colliery and Turner Lane No.1 & 2 (inc in filled reservoir) landfills presents a medium risk of contamination that could be mobilised during construction to pollute controlled waters. Controlled waters are particularly sensitive in this location because the proposed development site is located upon a Secondary A aquifer.

The application's Phase 1 Desk Top Study and partial Phase 2 Geo-Environmental Site Assessment demonstrates that it will be possible to manage the risk posed to controlled waters by this development. Further detailed information for Turner Lane No.2 and the in filled reservoir will however be required before built development is undertaken. We believe that it would place an unreasonable burden on the developer to ask for more detailed information prior to the granting of planning permission but respect that this is a decision for the local planning authority.

In light of the above, the proposed development will be acceptable if a planning condition is included requiring the submission of a remediation strategy. This should be carried out by a competent person in line with paragraph 178 of the National Planning Policy Framework.

Without these conditions it cannot be guaranteed that the development will not be put at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution

Condition

Prior to each phase of development approved by this planning permission no development shall commence until a remediation strategy to deal with the risks associated with contamination of the site in respect of the development hereby permitted, has been submitted to, and approved in writing by, the local planning authority. This strategy will include the following components:

1. A preliminary risk assessment which has identified:
 - all previous uses
 - potential contaminants associated with those uses
 - a conceptual model of the site indicating sources, pathways and receptors
 - potentially unacceptable risks arising from contamination at the site

2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off-site.
 3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
 4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.
- Any changes to these components require the written consent of the local planning authority. The scheme shall be implemented as approved.

Reason: To ensure that the development does not contribute to, or is not put at unacceptable risk from/adversely affected by, unacceptable levels of water pollution in line with paragraph 170 of the National Planning Policy Framework. To protect the underlying Secondary A aquifer.

Condition

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by, the local planning authority. The remediation strategy shall be implemented as approved.

Reason: To protect the underlying Secondary A aquifer and to ensure that the development does not contribute to, is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with paragraph 170 of the National Planning Policy Framework.

Condition

Prior to any part of the permitted development being brought into use, a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to, and approved in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

Reason: To ensure that the site does not pose any further risk to human health or the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete. This is in line with paragraph 170 of the National Planning Policy Framework.

Advice to applicant

Piling- Piling or any other foundation designs using penetrative methods can result in risks to potable supplies from, for example, pollution / turbidity, risk of mobilising contamination, drilling through different aquifers and creating preferential pathways. Thus it should be demonstrated that any proposed piling will not result in contamination of groundwater.

Waste on-site- The CL:AIRE Definition of Waste: Development Industry Code of Practice (version 2) provides operators with a framework for determining whether or not excavated material arising from site during remediation and/ or land development works are waste or have ceased to be waste. Under the Code of Practice:

- excavated materials that are recovered via a treatment operation can be re-used on-site providing they are treated to a standard such that they fit for purpose and unlikely to cause pollution
- treated materials can be transferred between sites as part of a hub and cluster project
- some naturally occurring clean material can be transferred directly between sites

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

We recommend that developers should refer to:

- the position statement on the Definition of Waste: Development Industry Code of Practice
- The waste management page on GOV.UK

Waste to be taken off-site - Contaminated soil that is (or must be) disposed of is waste. Therefore, its handling, transport, treatment and disposal are subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2016
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

If the total quantity of hazardous waste material produced or taken off-site is 500kg or greater in any 12 month period, the developer will need to register with us as a hazardous waste producer. Refer to the hazardous waste pages on GOV.UK for more information.

Greater Manchester Archaeological Advisory Service

GMAAS have commented twice before on consultations for this scheme and the following comments re-iterate our previous ones.

The archaeological interest is described in the archaeological desk based assessment prepared by CgMs (August 2018) and submitted in support of this application. Based on this, GMAAS consider the principal archaeological interest to relate to:

- Prehistoric settlement/funerary site potential, particularly for the higher ground on the west side of the development site
- The site of the mid-19th century Bredbury colliery and tramway
- The post medieval relict farming landscape in the form of the 18th century Mill Hill Farm's historic fabric and former building sites, the site of a building shown on 1830 mapping on Turner Lane, old field boundaries and old trackways (including Turner Lane).

GMAAS recommend that an archaeology condition is attached to any planning consent to secure the programme of archaeological work. The recommended conditioned scheme of archaeological work should commence with a general walkover survey of the proposed development area. This should be undertaken with a view to locating and recording any visible earthworks. The immediate area of Mill Hill Farm may also merit detailed survey to identify any traces of earlier structures or activity. This should then be followed by a phase of evaluation fieldwork. The evaluation should commence with geophysical survey. The results of the geophysical survey, the earthwork survey and sites identified in the DBA should then provide targets for evaluation trenching. The western half of the site, where a potential for prehistoric settlement has been recognised, should also be defined as a sub-area and subject to a level of evaluation trenching comprising no less than a 4% sample of that sub-area when combined with any targeted trenches. In this sub-area particular care should be taken in recognising more ephemeral cut features and/ or artefact scatters. Following demolition to ground level of the buildings and clearance of the rubble at Mill Hill farm, evaluation trenching should be undertaken. This will target the footprints of the buildings at Mill Hill Farm mapped in the mid-nineteenth century. Where the evaluation indicates the presence of archaeological remains worthy of further investigation there should be a programme of targeted open area excavation.

The condition should take the following wording:

No demolition or development-related ground works shall take place until the applicant or their agents or successors in title has secured the implementation of a programme of archaeological works. The works are to be undertaken in accordance with a Written Scheme of Investigation (WSI) submitted to and approved in writing by Stockport Planning Authority. The WSI shall cover the following:

1. A phased programme and methodology of investigation and recording to include:
 - a. earthwork survey and recording
 - b. geophysical survey
 - c. targeted and sample archaeological evaluation trenching
 - d. targeted open area excavation and recording (subject to a separate WSI)
2. A programme for post investigation assessment to include:
 - a analysis of the site investigation records and finds
 - b production of a final report on the significance of the heritage interest recorded

3. Dissemination of the results of the site investigations commensurate with their significance
4. Provision for archive deposition of the report, finds and records of the site investigation
5. Nomination of a competent person or persons/organisation to undertake the works set out within the approved WSI

Reason: In accordance with NPPF Paragraph 199 - To record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) and to make this evidence (and any archive generated) publicly accessible and SIE-3 "Protecting, Safeguarding and Enhancing the Environment" of the adopted Stockport Core Strategy DPD.

All archaeological work should be undertaken by a suitably qualified and experienced archaeological contractor, funded by the applicant. GMAAS will approve the WSI and also monitor the implementation of the work on behalf of Stockport Council.

Greater Manchester Police – Design for Security

Thank you for the opportunity to comment on the above application, having looked at the documents submitted, we would recommend that a condition to reflect the physical security specifications set out in the Crime Impact Statement should be added, if the application is to be approved.

Coal Authority

The Coal Authority previously commented on this planning application in a letter to the LPA dated 05 March 2020. I note the applicant has submitted further information, most notably:

- Phase 1 Geo-Environmental Site Assessment (e3p, November 2020)
- Volume 2: Environmental Statement - Chapter 1: Ground Conditions (e3p, December 2020)

I note that the conclusions of this additional information remain the same as the information reviewed at the time of my previous letter. There, I refer you back to the recommendations contained in my letter dated 05 March 2020.

05.03.2020 comments

The Coal Authority Response: Material Consideration

The Coal Authority previously commented on this planning application in a letter to the LPA dated 24 October 2021. We have now been provided with the findings of intrusive site investigations undertaken within the application site boundary. Specifically, we have reviewed the following notable documents submitted to accompany this planning application:

- Phase II Geo-Environmental Site Assessment (e3p, January 2018); and,

• Bredbury Gateway, Stockport Volume 2: Environmental Statement Chapter I Ground Conditions (e3p, February 2020).

The Phase II report details the findings of intrusive site investigations undertaken within the application site. Part of these investigations comprised of thirteen boreholes to identify shallow coal seams, one of these boreholes found the potential for shallow workings. When taking into account the amount of competent rock cover, the report author considers there to be 'unacceptable risk' associated with any future potential subsidence event as rock cover does not exceed the 10 times rule.

The report recommends in the central and southern sectors of the site that proof drilling and grouting on a 10m grid should be undertaken, where workings are encountered this should be reduced to a 6m grid with centre hole. In the northern portion of the site the report recommends that proof drilling and grouting should be undertaken on a 25m grid, reduced where necessary. In any case, the exact scheme needs to be agreed with the Coal Authority's Permitting team as part of the applicant's permit application. The Coal Authority also expects that scheme of remediation should take into account the development as a whole, including roadways, car parking and areas of open space. If drilling and grouting is not to be undertaken in these area we will expect justification as to why and description of what mitigation measures are to be taken to ensure the safety and stability of these aspects of the proposed development.

In regard to mine entries 392392-002 & 392392-001, the Phase II report details that location of mine entry 392392-001. It correctly considers that a suitable stabilisation solution needs to be proposed and that final development layout must take due consideration of this features location. I note that mine entry 392392-002 also needs to be located, while both mine entries still require their condition to be determined.

The Coal Authority still expects that intrusive site investigations should determine the exact location and condition of both mine entries within the application site. The findings from these investigations should then be used to calculate no build zones for these features and subsequently inform the site layout for Part A by the reserved matters stage; demonstrating that adequate separation has been provided between mine entries and any building proposed. Furthermore, detailed remediation measures should be identified for these features in order to mitigate the risks posed. A layout plan plotting the found position of the mine entries should be submitted for approval by the LPA. The plan should also define the features 'no-build zone' as calculated using site specific ground condition data from investigations.

The recommendations for further schemes of investigations and remediation is supported in the Bredbury Gateway, Stockport Volume 2: Environmental Statement Chapter I Ground Conditions (e3p, February 2020).

The exact form and extent of intrusive site investigations need to be agreed with the Permitting Section of the Coal Authority. These investigations need to be prepared and conducted by a suitably competent person and findings used to inform an appropriate scheme of remedial works. In addition consideration should also be afforded to the risks posed to the development by mine gas.

The Coal Authority's Revised Recommendations:

Accordingly, the Coal Authority recommends the imposition of the following conditions:

PART A: Outline

- Prior to (or concurrent with) the submission of the first of the reserved matters the findings from intrusive site investigations to locate the mine entries on the site shall be submitted to the Local Planning Authority for consideration and approval in writing. These findings shall be supported by a plan which shows the location of the mine entries established as being present on the site and shall define suitable no build zones for these features. A detailed remediation and mitigation scheme for the mine entries on site shall also be submitted to the Local Planning Authority for consideration and approval in writing.
- No development shall commence until a detailed remediation scheme to protect the development from the effects of shallow mine workings has been submitted to the Local Planning Authority for consideration and approval in writing. Following approval, all remedial, treatment and mitigation works for mine entries and shallow workings shall be implemented on site in complete accordance with the approved details.

Part B: FULL

- No development shall commence until a detailed remediation scheme to protect the development from the effects of land instability associated with coal mining legacy has been submitted to the Local Planning Authority for consideration and approval in writing. Following approval, the remedial works shall be implemented on site in complete accordance with the approved details.

The Coal Authority therefore has no objection to the proposed development subject to the imposition of the conditions to secure the above. This is our recommendation for condition wording. Whilst we appreciate that you may wish to make some amendment to the choice of words, we would respectfully request that the specific parameters to be satisfied are not altered by any changes that may be made.

The following statement provides the justification why the Coal Authority considers that a pre-commencement condition is required in this instance:

The undertaking of intrusive site investigations, prior to the commencement of development, is considered to be necessary to ensure that adequate information pertaining to ground conditions and coal mining legacy is available to enable appropriate remedial and mitigatory measures to be identified and carried out before building works commence on site. This is in order to ensure the safety and stability of the development, in accordance with paragraphs 178 and 179 of the National Planning Policy Framework.

Tameside MBC

Thank you for your letter dated 14 December 2020 regarding the above planning application inviting further representations following the receipt of amendments.

I understand that the amendments principally relate to:

- a reduction in the quantity of floorspace by 20%;
- amendments to the location of buildings proposed on the site;
- a reduction in the net developable area by 30%; and,
- an increase in the landscape buffers around the periphery.

It is these aspects that this letter focuses upon. However, this response should still be read in conjunction with previous correspondence raising objections to the proposals.

Specifically, you will recall that Tameside Council has previously made representations to the planning application on 21 October 2019, 11 March 2020, and 1 June 2020.

Tameside Council's grounds for objecting to the application previously focussed on the matters of concern as summarised below and concluded that the benefits to be delivered by the proposals would not outweigh the totality of the harm identified and, therefore, did not amount to the very special circumstances required to justify inappropriate development in the Green Belt:

1. Conflict with the aims and objectives of Green Belt policy (openness and permanence) and therefore conflict with SUDP policies GBA1.1 and GBA 1.2;
2. Impact of the development on the landscape character area within which the site is located and harm to its associated recreational benefits resulting in conflict with SUDP policies LCR1.1, LCR 1.1a, and L1.5;
3. Concerns over additional traffic generation through Denton having an adverse impact on local residents and businesses through increased noise and congestion, and likely decrease in local air quality;
4. Flaws in the submitted Alternative Site Assessment Study which was based on the 2016 draft allocation boundary; and,
5. Proposed development occurring outside of the proposed draft GMSF allocation (GMA-34) and only a limited green buffer towards the northern boundary.

As you are aware, the Greater Manchester Spatial Framework Publication Plan 2020 (Draft for Approval, October 2020) was presented to AGMA Executive Board on 30 October 2020. The recommendation that the GMSF be published for representations and subsequent submission to the Secretary of State was endorsed. This Publication Plan included Policy GM Allocation 31 (Bredbury Parkway Extension) which, following the consideration of all available evidence, set out that this site could support approximately 60,000m² of B2/B8 floor space and would retain a significant element of Green Belt within its boundary.

Whilst it is recognised there has been a reduction in the B2/B8 floorspace proposed, the quantum of development still gives cause for maintaining our objections, and our understanding is that the total amount of B2/B8 floorspace now proposed is 93,184m².

It is accepted that there has been an increase in the size of the green buffer to the north eastern boundary of the site which was also a concern raised in our previous objections. However, the increase proposed is not considered sufficient to enable us to remove our objection on this point, and the development is still considered to have a harmful impact on the visual amenity and established character of this part of the Tame Valley. Furthermore, we note that the proposals would still result in significant development taking place within an area set aside as retained Green Belt in the Publication Plan. Irrespective of the of the Publication Plan the quantum and form of development is still not considered to result in benefits that would outweigh the harm caused and amount to being very special circumstances necessary to justify inappropriate development in the Green Belt.

In conclusion, the objections previously raised by Tameside Council appear to be largely unresolved. Particular concerns remain about the potential routing options of Heavy Goods Vehicles along the A6017 towards and through Denton to access both the M60 and M67 motorways. This would be of significant detriment to Denton's residents and businesses operating in this location through impacts of noise, congestion and air quality. Tameside Council also maintains its objections on the grounds of the harmful impact to landscape character, the significant incursion into the Tame Valley, and the loss of recreational value. Together, these elements of harm are material in determining whether very special circumstances exist.

In summary, it is considered that the very special circumstances needed to justify inappropriate development in the Green Belt still do not exist, and therefore Tameside Council remains unable to support the application.

01 June 2020

I refer to my previous letter dated 11 March 2020 raising continued objections to the above planning application.

It has come to my attention that a drafting error exists in my letter whereby it was suggested that the red line boundary associated with the application, other than the site access, is completely contained within the GMSF Draft Allocation Boundary (GMA-34). As you will no doubt know, this is not correct, since the outline element of the application site includes Finland Park Farm to the south east.

Whilst I am taking the opportunity to clarify this point I can confirm that the objections made in my previous letter still stand. However, I remain of the view that continued dialogue between Tameside and Stockport Council takes place so that any opportunities to address or mitigate the concerns and objections I have raised can at least be considered.

11 March 2020

For the avoidance of doubt Tameside Council has previously raised objections to the original application by letter on 21 October 2019 on the following (summarised) grounds:

1. Conflict with the aims and objectives of Green Belt policy (openness and permanence) and therefore conflict with SUDP policies GBA1.1 and GBA 1.2;
2. Impact of the development on the landscape character area within which the site is located and harm to its associated recreational benefits resulting in conflict with SUDP policies LCR1.1, LCR 1.1a, and L1.5;
3. Concerns over additional traffic generation through Denton having an adverse impact on local residents and businesses through increased noise and congestion, and likely decrease in local air quality;
4. Flaws in the submitted Alternative Site Assessment Study which was based on the 2016 draft allocation boundary; and,
5. Proposed development occurring outside of the proposed draft GMSF allocation (GMA-34) and only a limited green buffer towards the northern boundary.

The objection made clear that despite the economic benefits the scheme would undoubtedly deliver, in the context of the issues raised above, we questioned whether this is the most appropriate location to accommodate the scale of the development proposed. The letter advised that the Council considered the totality of the harm identified was not clearly outweighed by other material planning considerations and, as such, the very special circumstances required to justify inappropriate development (in the Green Belt) simply did not exist.

The re-consultation now provides the opportunity for Tameside Council to review its position and I understand the material amendments made to the scheme include:

1. A change in the application type from an outline planning application to a hybrid comprising the following component parts:

Part A: Outline planning permission with all matters reserved for the creation of a commercial/industrial development providing up to 76,272m² of B2/B8 employment floorspace (including ancillary office accommodation) with an allowance for up to 929m² 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); and,

Part B: Full planning permission for the creation of two commercial/industrial unit comprising 39,857m² (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).

2. Reduction in the red line boundary so that, with the exception of the proposed access from Bredbury Parkway, the application is completely contained within the GMSF Draft Allocation Boundary (GMA-34).

The amendments made to the application type suggest that part of the site (for which full planning permission is now sought) will be brought forward for development more quickly - further in advance of future decisions taken in respect of the GMSF.

The objections raised previously by Tameside Council, and which appear to be largely unresolved, include the visual and more localised impact of the development. However, Tameside Council remains extremely concerned about the potential routing of Heavy Goods Vehicles along the A6017 towards and through Denton to access the M67 and M60 motorways. This would result in serious impacts on residents and businesses operating in Denton through noise disturbance, increased congestion, and deterioration in overall air quality in the surrounding area. Without assurances of how such impacts could be prevented, minimised, or mitigated appropriately for, this aspect of the objection from the Council should be given substantial weight in the consideration of the application.

In summary, there are significant environmental, economic and social impacts arising from the proposal, and Tameside Council maintains its objection on the grounds of its detrimental impact on the openness and permanence of the Green Belt, its harmful impact on landscape character and loss of recreational value, and its impact on traffic generation and consequent harm to local residents and businesses in Denton. However, without prejudice, it is important that continued dialogue between Tameside and Stockport Council takes place so opportunities to address or mitigate the concerns and objections raised can at least be considered.

Cheshire Wildlife Trust

Following a detailed review of the Biodiversity Net Gain (BNG) DEFRA Metric 2.0 spreadsheet (08 February 2021) in conjunction with the updated Environmental Statement (ES) Chapter H: Biodiversity (January 2021) and the updated Ecological Assessment Rev. H; Cheshire Wildlife Trust (CWT) would like to submit the following comments.

CWT welcomes the fact that a number of the comments raised in our previous objection letter (dated 11 January 2021) have been addressed, however, there are still a number of outstanding concerns. As a result CWT would still object to the proposed scheme based on this new iteration of the BNG metric. A summary of our key concerns is included below:

1. Our previous comment (comment 2 in the letter dated 11 January 2021), in regard to the metric being applied inappropriately to an area of neutral grassland, has been justified in the revised Ecological Assessment Rev. H as follows:

“The poor semi-improved, horse grazed paddocks and fields have translated to ‘modified grassland’ in UK Hab. This habitat does not qualify as BAP grassland. The neutral grassland on site is concluded to be ‘modified grassland’ because it is species-poor, it was previously semi-improved grassland but is currently unmanaged. The species diversity is not diverse enough to match the neutral grassland definition.”

CWT does not believe this key issue has been addressed in appropriate detail. This justification should only be accepted if evidenced by a comprehensive botanical species list, complete with DAFOR values, that verifies the claim that the species diversity of this habitat parcel does not meet the neutral grassland definition. As per the UK Habitat Classification Habitat Definitions¹ guidance document the definition of g3c other neutral grassland is:

Perennial Rye-grass *Lolium perenne* is likely to be present at <30% with between 9 and 15 further species (M2) also present. Many of the more species rich swards that were previously described as “semi-improved neutral grassland” will fall here, together with rank and unmanaged swards on neutral soils.”

Species poor variations of this sward are excluded and would be classified as g4 Modified Grassland, as per the justification provided in the Ecological Assessment Rev. H, however this should be evidenced in a detailed species list due to the significance of the effect on the outcome of the overall BNG metric score. There are also a number of other grassland classifications that differ slightly to the definition provided above. CWT believes that based on the current description of the neutral grassland in the updated ES, the habitat described could potentially match the UKHab definition of g3c7 *Deschampsia* neutral grassland. This habitat would be classed in the metric as other neutral grassland and therefore represent additional BNG units.

This change has the potential to result in the reduction of the headline total net percentage change for habitats from a +10.32% net-gain to a -1.35% net loss.

2. In reviewing the UKHab guidance documentation for the comment above, CWT believes there is also a lack of evidence to support the blanket conversion of all poor semi-improved grassland across the application site to g4 modified grassland. Only the fields that are evidenced to be species poor (<9 species per m²) should be converted to g4 modified grassland. This should be evidenced as per the above comment, with a comprehensive botanical species list, complete with DAFOR values, for each individual field across the application site.

3. There is still a discrepancy of approx. 0.7 ha between the habitat baseline and site habitat creation areas.

In addition to the specific comments above, the following general queries have also not been addressed:

- No report or technical note has been submitted by the applicant to support the BNG metric assessment. A brief methodology and some discussion of the proposed off-site compensation is set out in the ES chapter but in general there is a lack of detail around how the assessment was carried out, any assumptions made or limitations encountered. Any project assumptions and limitations should be reported in line with BNG Good Practice Principles for Development², Principle 10. Be transparent – “Communicate all Net Gain activities in a transparent and timely manner, sharing the learning with all stakeholders.”
- Some of the condition assessment criteria have been briefly referenced in relation to the proposed habitat creation and enhancement, although this appears to be arbitrary and not specific or detailed enough to inform a management plan. As per our previous comment, no evidence such as photographs, survey notes or records of habitats in their recorded conditions have been included to support the metric. CWT recommends the condition

assessment survey data should be made available for review as part of a wider BNG report / technical note for the project (as described above). Without evidence of habitat condition assessments it is difficult to scrutinise or verify whether any of the proposed habitat enhancements (as per the metric) are feasible. The actions required for enhancing habitats must be derived from the BNG Technical Supplement³ and based upon failed condition assessment criteria for each habitat entered into the metric.

- As per our previous comment, on the use of the "fairly" condition category throughout the metric. Use of the "fairly" category should be avoided unless it can be appropriately justified each time it is used. Detailed condition assessments for the baseline habitats are still outstanding so the use of "fairly" cannot be verified.
- As per our previous comment, a habitat management plan is still outstanding although this has been acknowledged by the applicant. CWT recommend this is submitted prior to determination of the application to ensure its consideration is included in making the decision.

In addition to the summary above, the comments previously included in our previous objection letter (dated 11 January 2021) have been reviewed in light of the re-submitted metric spreadsheet and are appended to this letter (Appendix 1). This includes comments that have not been addressed and those identifying additional errors within the metric and additional queries in regard to how the metric has been applied to the proposed scheme.

CWT would again welcome an opportunity to discuss the issues highlighted within this letter with a representative from Greater Manchester Ecology Unit and/or from the ecological consultant.

Biodiversity Net Gain is covered under the NPPF policies 170d, 174b, 175d and is set out in the Chancellor's Spring Statement 2019, the 25 Year Environment Plan (2018) and the current iteration of the forthcoming Environment Bill.

Appendix 1

Bredbury Gateway Biodiversity Net Gain (BNG) DEFRA Metric 2.0 spreadsheet (04 December 2020)

In addition to those set out in the main body of the letter, a number of additional errors within the metric and additional queries in regard to how the metric has been applied to the proposed scheme are included below.

Habitats

- As per our initial comment, the initial phase 1 habitat survey of the application site was carried out on 13 December 2016 and updated on 08 June 2018. This is now almost three years out of date and will need updating in the appropriate season this year as per good practice guidance⁴.

Off-Site Habitat Baseline

- As per our previous comment, the walkover/ground-truth survey of Woodhall fields was undertaken in March 2020 which is sub-optimal time of year for

botanical survey. This may have resulted in the habitats off-site being undervalued (both habitat type and habitat condition).

Hedgerows

Site Hedgerow Baseline

- As per our previous comment, hedgerow assessments were undertaken in December 2019 which is sub-optimal time of year for botanical survey. This may have resulted in the hedgerows on-site being undervalued (both habitat type and habitat condition).

Chief Executive – Mayoral Development Corporation

As you will be aware, following the formation of the MDC in September 2019 and the publication and adoption of the Strategic Regeneration Framework, the MDC is aiming to create a new urban village in 130 acres to the west of the Town Centre based on the guiding principles of Community, Sustainability and Innovation. The ambition is to deliver 3,500 new homes and 1,000,000 sq.ft. of commercial space over the next 15 to 20 years.

The regeneration of a significant area of brownfield land with a large number of predominantly industrial uses currently operating in this area and key to the MDC's ambition is the provision of other good quality employment space elsewhere within the Borough to provide relocation opportunities which will not only enable land to be released for the uses required to deliver the vision set out in the Strategic Regeneration Framework but also as importantly retain the jobs which these businesses provide within the Borough.

I can therefore confirm that the MDC are supportive of the application.

Head of Economy, Work & Skills

The Economy, Work and Skills team are fully supportive of the proposal for Bredbury Gateway.

This proposal brings a significant amount and variety of opportunities to deliver on a range of work, skills, green and health priorities for Stockport and neighbouring Tameside. The Council will be leveraging the maximum gain for employment and skills during the construction phase through its approach to using employment and skills agreements with the developer to secure apprenticeships, training, work experience and support for schools' careers advice activity.

With around 1,600 jobs and many new businesses being based at the expanded site, this is an important and significant contribution to the local economy when we will be trying to recover from the impact of the pandemic that has caused a doubling in unemployment, and particularly youth unemployment for 16 – 25 year olds, as well as the over 50s. This site will also support business to cope with the impact of changes to the economy caused by Brexit by providing good quality space for those businesses that may need to return operations to the UK because of the logistics and financial implications of changes to tariffs with Europe.

Stockport and Tameside have an under-supply of light industrial units and workspace and this is inhibiting economic growth and productivity for these

boroughs. The Government is providing access to various funding streams for local authorities to respond to their policy aspirations for growing the economy and improving productivity. This site would provide an opportunity to leverage these, and future funding streams linked to post-pandemic economic recovery that may be announced in the next budget, so that we can be ready to make the most of attracting funding to Stockport by being in a position to move quickly.

Bredbury Gateway will provide excellent accommodation for businesses that will offer vocational occupations and higher level roles for people from foundation and entry level through to senior and executive positions. The new site will provide support for Stockport to establish a leading role in being the location of choice for businesses that are being established and grown to deliver on achieving net zero through a growing green economy. These businesses will deliver an enhanced return to reducing environmental impact and alleviating climate change which will far outweigh the cost of the green belt take for the footprint of the site.

The geographic location of Bredbury Gateway is ideal because of its proximity to some of our most deprived communities, as well as those in Tameside, offering local employment for people who will struggle to afford their own vehicle or the cost of long journeys on public transport. With walking and cycling to work on the site being a realistic prospect for local people, emissions from travel to work will be reduced as well as delivering health benefits for the individuals.

A further opportunity lies in the ability for local schools to partner easily with businesses to provide experience of the world of work for young people in the area who rarely have good chances to be engaged and motivated to aspire to good employment and the improved life chances that research shows follow on from it.

The considerations around establishing an expanded site at this location are certainly challenging, but the benefits and plus side to be gained from going ahead, in my opinion, far outweigh any negative aspects of the proposal.

ANALYSIS

Introduction

This is a complex application which requires detailed consideration. Before proceeding with the detailed analysis of the case, it is important to outline the main considerations in this case. The main material considerations considered pertinent to the determination of the case are:-

- Green Belt, Green Belt harm, and any other harm
- The Case for Very special circumstances
- Landscape/visual impact
- Impact on ecology and trees
- Noise pollution
- Air pollution
- Residential amenity
- Highway impacts
- Public rights of way impacts

- Flood risk
- Other matters such as impact on the historic environment, contamination/land stability, mineral extraction, agricultural land, crime impact, energy efficient design.

Representations

A considerable number of representations have been received in response to the public consultation that has been carried out, including representations from Andrew Gwynne MP, William Wragg MP and Tameside Councillors. Comments have been received from over 800no. addresses, with the majority of residents objecting to the development. The concerns raised are set out in full in the Neighbour/Public Consultation section above. The concerns raised most frequently relate to the following issues:

- Impact on ecology, particularly the impact on the Tame Valley, and climate change.
- Visual impact on the site itself and views from nearby properties.
- Impact of additional traffic on the highway network and the associated impact on pedestrian safety.
- HGVs will travel through Denton to avoid the low railway bridge.
- Impact of additional pollution on air quality and public health.
- Harm to the amenity of neighbouring residents.
- Loss of green space which is well used for recreational purposes.
- Lack of need/demand for the development.
- Loss of Greenbelt land.

Of the responses received, 202 were from residents/businesses with a Stockport postcode, with 176 objecting to the scheme and 26 in support of the development. It is clear that the majority of responses were from outside of the borough.

These concerns will be addressed in the main body of the report below.

Principle of the development and Green Belt considerations

Paragraph 11 of the NPPF states that there should be a presumption in favour of sustainable development, which sits at the heart of the Framework and for decision taking means (unless material considerations indicate otherwise) approving development proposals that accord with the development plan without delay; and where there are no relevant development plan policies, of the policies are most important for determining the applications are out of date, granting permission unless:

- i) The application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing development (footnote 6); or
- ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies of the Framework taken as a whole.

The policies referred to in footnote 6 include those in the Framework relating to Green Belt.

Paragraph 47 identifies that Planning Law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

The starting point for decision making is, of course, the statutory development plan. The site lies within the Greater Manchester Green Belt as designated by SUDP Policy GBA1.1 and the accompanying Proposals Map. The Greater Manchester Green Belt was originally designated in 1984 by the Greater Manchester Council. The NPPF (Para.133) makes clear that the Government attaches great importance to Green Belts with the fundamental aim of Green Belt policy being to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

NPPF Para.145 and SUDP Policy GBA1.2 state that the construction on new buildings in the Green Belt should be regarded as inappropriate unless the development is one of a number of specified exceptions. However, it is confirmed that none of the exceptions in Para 145 apply in this case.

The proposed development therefore falls to be considered as inappropriate development within the Green Belt under the terms of Policy GBA1.2 and the NPPF. The applicant in their submission has addressed this matter in detail.

NPPF Para. 143 states *that “inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances”*. This strong presumption against inappropriate development is also set out in SUDP Policy GBA1.2; however, this policy makes no specific allowance for ‘very special circumstances’ exceptions to be made, and therefore it is considered that local policy conflicts with the NPPF in this instance (note that SUDP policies predate the NPPF and are based on former government policy that left ‘very special circumstances’ exceptions to be considered outside the development plan). In accordance with NPPF Par.213 greater weight should therefore be given to the NPPF in these circumstances.

The assessment of whether ‘very special circumstances’ exist and whether they clearly outweigh the harm to the Green Belt, and any other harm, caused by the development is therefore key to determining whether planning permission should be granted. Nonetheless, the fact that the proposal constitutes inappropriate development in itself means that the development is, by definition, harmful to the Green Belt. NPPF Paragraph 144 makes clear that substantial weight should be given to any harm to the Green Belt. It follows that substantial weight should therefore be given to the harm to the Green Belt caused by the development by reason of inappropriateness. In addition to the harm caused by inappropriateness, it is then necessary to consider the magnitude of the development’s impact on the openness and permanence of the Green Belt as well as any harm to the purposes of the Green Belt.

Green Belt Harm

It is established that the proposed development comprises inappropriate development, and therefore that the development is, by definition, harmful to the Green Belt. NPPF Para.144 requires that substantial weight is given to any harm to

the Green Belt and that 'Very Special Circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. It therefore follows that substantial weight should be given to the harm to the Green Belt and that 'any other harm' resulting from the development is fully considered.

In assessing the development, and having regard to 'any other harm' it is also necessary to consider the significance of the development's impact on the openness and permanency of the Green Belt, which are the two essential characteristics defined by Para.133 of the NPPF. In addition to the harm caused by inappropriateness, it is then necessary to consider the magnitude of the development's impact on the openness and permanence of the Green Belt and any harm to the purposes of including land in the Green Belt.

The site is currently undeveloped with the exception of buildings associated with Finland Park Farm and Mill Hill Farm, and comprises open fields intersected by trees and hedgerows. The proposed development of 93,184 sqm of industrial/warehousing units up to 22m in height with associated car parking and roads would clearly result in a significant reduction in openness by virtue of the scale and visual impact.

National Planning Practice Guidance (Paragraph: 001 Reference ID: 64-001-20190722) also sets out that the degree of activity likely to be generated from any proposed development such as traffic generation can also be a consideration in assessing openness. The traffic movement and general increase in activity associated with the proposed development will be significant, and it is considered that this will further reduce the openness of the Green Belt.

As part of the application a full landscape and visual assessment has been provided, including mitigation measures. Whilst the landscaping and visual mitigation measures proposed within the ES would mitigate the visual impact over time, the harm to the Green Belt as a result of the permanent reduction in openness, is considered to be significant. This additional harm should be attributed substantial weight in the overall planning balance.

As identified earlier, SUDP GBA1.2 makes no allowance for 'very special circumstances' and as such the NPPF is considered to be most up to date for the determination of the application. Para 134 of the NPPF identifies the purpose of including land in the Green Belt as:

- To check the unrestricted sprawl of large built up areas
- To prevent neighbouring towns from merging into each other
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns and,
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

Each purpose is considered in turn below:

To check the unrestricted sprawl of large built-up areas

In 2016 an assessment was undertaken of Greater Manchester's Green Belt in association with the preparation of the GMSF. The assessment looked at the Green Belt's contribution to meeting the five purposes as outlined in national planning policy. The site lies within parcel SSP5 of the assessment and was assessed as scoring strongly for four purposes of the Green Belt.

The Green Belt Assessment found that Parcel SSP5 plays a strong role in checking urban development between Bredbury Park Industrial Estate and Woodley and forms a critical gap between the industrial estate and Denton. The application site sits alongside other parcels of Green Belt land to form part of the Tame Valley and Brinnington landscape character area (LCA) and a major green corridor.

Although the River Tame and the proposed landscape buffer zone would retain some degree of separation, the proposed development would clearly reduce the gap between Haughton Green and Bredbury Industrial Estate by up to 400metres, therefore resulting in harm to this particular purpose of the Green belt.

To prevent neighbouring towns merging into one another

The development would not result in neighbouring towns merging as a green corridor would remain between the northern edge of the development and the southern edge of Haughton Green. This corridor is mainly formed by fields on the north side of the River Tame but also by a belt of existing trees to the south, and this would be strengthened by new landscaping associated with the development. The River Tame forms a natural barrier between the two settlements. The site is contained by existing development to the south and east and Ashton Road to the west.

It is clear that there would be a significant reduction in the gap between Bredbury and Haughton Green that would result in some harm to this particular purpose of the Green Belt. However, given that a clear landscaped gap would remain it is not considered that the level of harm would be severe.

To assist in safeguarding the countryside from encroachment

Taking into account the additional landscaping proposed within the site, the proposed development would result in the loss of approximately 21.46 hectares of open countryside and would therefore clearly conflict with this Green Belt purpose. Member will note that the whole site extends to 30.90 hectares leaving 9.44 ha as landscaping/habitat areas.

To preserve the setting and special character of historic towns

There would be no impact on historic towns and therefore no conflict with this Green Belt purpose.

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

The Green Belt helps to direct new development towards existing urban areas and to focus new B2/B8 uses in existing employment areas in accordance with SUDP Policy E1.1 and Core Strategy Policy CS7.

Part of the justification put forward by the applicant is that there are no alternative sites outside the Green Belt capable of accommodating the development and that

the development would bring significant regeneration benefits to the local area. They consider that there is a specific demand for a large-scale development to meet the needs of the logistics/manufacturing sector and a lack of supply to meet this demand within the existing urban area. These matters are discussed in the following section of this report which contains an assessment of whether 'very special circumstances' exist.

Other harm

In assessing whether 'very special circumstances' exist regard must also be had to any other harm that may be caused by the development, in addition to Green Belt harm. The later sections of this report discuss the impacts of the development on the site and surroundings.

Summary of Green Belt harm

The development is inappropriate development within the Green Belt, and therefore harmful by definition. There would be additional harm caused by a significant reduction in openness, urban sprawl and encroachment into the countryside. Substantial weight should be given to this Green Belt harm. The application proposes inappropriate development in the Green Belt, which would be contrary to three of the five purposes of including land within the Green Belt and would have a significant impact on the openness of the Green Belt, contrary to Saved Policy GBA1.2. Accordingly, significant weight should be given to such impacts to the Green Belt, in addition to the substantial policy harm to be attached by reason of the inappropriateness of the development (NPPF 144).

Very Special Circumstances

Despite the very strong presumption against inappropriate development within the Green Belt, the NPPF does not prevent development taking place if 'very special circumstances' exist that clearly outweigh the harm to the Green Belt by reason of inappropriateness, and any other harm. Some of those making representations received to the development do not believe that there is a need for the development, that they believe that the development could be located elsewhere and that the applicant has not demonstrated very special circumstances.

What constitutes a case for 'very special circumstances' is not defined within either the NPPF or local policy. There could be a single factor that outweighs the harm, or a number of benefits which, when considered in isolation might not be considered individually 'very special', but collectively amount to 'very special circumstances'. The weight given to any particular factor, and their combination, is a matter of judgement for the decision maker.

Case law suggests that the following principles may be relevant:

1. Identify (with evidence) an essential objective that the proposal is intended to meet;
2. Demonstrate that this objective could not reasonably be met in a less harmful way (i.e. consideration of sites outside the Green Belt, or less harmful sites within the Green Belt); and

3. Demonstrate that the proposed development would meet the essential objective and that doing so clearly outweighs the degree of harm caused by the proposal.

The applicant has put forward the following factors which they consider constitute 'very special circumstances (VSC)':

- The need/demand for the development;
- Lack of alternative sites;
- The economic and regeneration benefits; and
- Other benefits.

Each of the VSC will be assessed in turn:

Need/demand for B2/B8 development in Stockport

In support of the application an Employment Land Needs Assessment (ELNA) and a Stockport Industrial Market Analysis Report (SIMA) have been submitted.

The Employment Land Needs Assessment examines the quantitative and qualitative need for strategic industrial/warehousing development in Stockport, the main economic and labour market conditions for Stockport's economy, reviews current employment floorspace within Stockport, assesses the future economic growth needs and considers the industrial land demand/supply balance.

The analysis of Stockport's economy is based around population growth, job growth, productivity levels, business growth and the labour market. The key points are set out below:

- Stockport has low levels of population growth but strong growth in the working age population is predicted between 2018 and 2037.
- There was strong growth in total workforce jobs between 2000 and 2018 and high levels of growth are forecasted over the next 19 years.
- Stockport has high levels of productivity per workforce job which reflects a higher - value employment base in the borough. Productivity growth is forecasted to be high in Stockport over the next 19 years.
- The borough has strong levels of economic activity, low levels of unemployment, high levels of qualification attainment and high local workforce wages.
- At a sub-regional level there are areas within Stockport with very high levels of unemployment, low levels of qualification attainment and low wages.
- Unemployment rates in Stockport between 2018 – 2019 were generally lower than elsewhere in the north west but there are clear variations at a sub-regional level, with rates significantly higher for Brinnington. In 2011 11.3% of Brinnington residents were unemployed compared to 3.9% for Stockport and 4.4% for the north west.

- The estimated net annual household income in 2015/16 for Brinnington was also significantly (-38.4%) lower than the average for Stockport and was the lowest of any sub-local authority areas within the borough.
- Stockport experiences net out-commuting, particularly into nearby Manchester, Salford and Cheshire East. The low level of out-commuting to the northern areas of Greater Manchester suggest that employment needs should be met within Stockport's own boundaries.
- The baseline assessment of Stockport's economy indicates that the borough is well placed to capture economic growth.

The Employment Land Needs Assessment considers the future economic growth requirements in Stockport by using economic forecasting data to predict future employment growth needs and the floorspace requirements to stem from these needs. The applicant considers that the requirement for industrial/warehousing land in Stockport Borough over the period 2020 to 2037 ranges from a low of 43.3 ha to a high of 62.31 ha. The average of the 5 scenarios modelled equates to 49 ha.

The quantitative need identified by the applicant does not reflect the demand set out within Stockport's 2018 ELR, as this identifies a need of just 4.8ha based on the Greater Manchester Forecasting Model (GMFM). However, the GMFM has been updated since the 2017 version which underpinned ELR2018, with a baseline forecast published in 2019. In addition, a further report on the future of employment land needs across Greater Manchester was published in February 2020 (Nicol Economics). Whilst neither document looked in detail at the nature of employment units required in Stockport, both identified the continued trend for additional B2 and B8 floorspace requirements across Greater Manchester.

In addition to evidencing a quantitative need the applicant considers that there is a qualitative need for employment development in Stockport. The case for this is set out within the Industrial Market Analysis Report and the Employment Land Needs Assessment. The key points from these documents are summarised below.

- There is a vacancy rate of just 7.17% across the Borough as a whole, this being weighted towards older premises not suited to current requirements and is significantly lower in locations such as Bredbury Industrial Estate where premises tend to be newer.
- Bredbury Industrial Estate (December 2020) has an overall vacancy rate of 6.6%. However, there are a number of units under offer within Bredbury Industrial Estate which when complete will reduce this figure further.
- Growth in manufacturing and e-commerce sectors in recent years has resulted in unprecedented take-up of premises.
- There are no large-scale industrial premises (over 100,000 sq.ft.) either available or coming forward in Stockport Borough.

- Of all the large-scale industrial premises (over 100,000 sq ft) recently completed, under construction or second hand, in the north west none are within Stockport Borough.
- Existing supply is primarily focussed around Bredbury Park Industrial Estate, Whitehill Industrial Estate, Bird Hall Lane and Crossley Park. A significant element of the available industrial space in Stockport is made up of old multi storey mill space which is not appropriate for the majority of modern businesses.
- The total availability of vacant industrial premises in Stockport totals just 747,043 sqft (69,403 sqm) across 48 units. Only two of these units are over 50,000 sq ft in size.
- There is an absence of any large-scale sites capable of accommodating a new large scale industrial/logistics facility. Of the industrial sites within Stockport only 8 are over 0.5 ha in size and two are currently being built out, making them unavailable.
- Based on current recorded availability of premises there is currently less than 2 years' supply of industrial premises based on average reported take up for the period 2014 - 2019. Much of the available accommodation is of poor quality in the context of modern occupier needs inevitably leading to many occupiers leaving the Borough to acquire suitable premises.
- The lack of available good quality B2/B8 accommodation within the borough is acknowledged within the Stockport ELR 2015.
- There are no available development plots within the Bredbury Industrial Estate.
- In 2017 across the north west region as a whole approximately 139,355 sqm of large scale industrial/warehousing premises was taken up in 2017. Of the nine largest transactions, none were within Stockport and only one was in south Manchester.
- The effect of the current low availability is illustrated by the speed at which new industrial space is taken up. The S:Park scheme was sold/let within 12 months of completion in 2015 and the Aurora scheme reached completion in 2018 with only two units remaining.
- There are numerous examples in the north west where fully serviced sites have successful results and high take up. This demonstrates the need for such sites and why Stockport have failed to attract occupational interest.
- The level of pent up demand is illustrated by the high rents being achieved in existing industrial estates.
- Exceptional demand has been shown in the Bredbury Industrial Estate extension from Stockport based companies that wish to remain in the borough but are unable to expand.

- The lack of employment sites in the area is demonstrated by Swizzles Matlow, who have had a long-standing requirement for employment land in Stockport but due to the lack of available sites have now acquired a site at Midpoint in Middlewich.
- There is a particularly strong demand for units in excess of 100,000 sq ft. There are currently live requirements for approximately 4 million sq ft from multiple occupiers seeking space in Greater Manchester who would consider locating in Stockport if a suitable, deliverable site were made available.
- Proposals are currently being progressed for Stockport Town Centre West by the Mayoral Development Corporation [MDC]. The proposals would bring forward a Strategic Regeneration Framework which covers land to the south and east of Junction 1 of the M60 and west of the A6 incorporating a large swathe of Stockport Town Centre. They include the removal of older industries and the redevelopment of the area for a mix of housing and offices. Parts of the area include traditional industries that would be displaced by the proposals. It is imperative that additional employment land is provided if these important regeneration proposals are to be progressed so as not to force existing business to relocate outside of Stockport.
- The B2/B8 employment land requirement set out within the 2018 ELR should incorporate a replacement for losses for employment land to other uses.

Consideration of alternative sites/Lack of alternative sites

An Alternative Sites Assessment has been submitted with the planning application. The assessment seeks to establish whether there are any alternative sites that could meet the aforementioned established need for a large-scale B2/B8 development, looking at both non-Green Belt sites and other Green Belt sites that may be able to accommodate the development with less harm. As can be seen from the representations received above, many objectors state that the Green Belt harm could be avoided and that the development should be located out of the Green Belt. This is not a matter supported by evidence submitted with the application.

The assessment considers sites within both Stockport and the adjoining borough of Tameside to reflect the proximity of the site to the Tameside boundary. Sites with planning permission for employment purposes, allocated employment sites, sites within an emerging policy document, sites being marketed, and sites considered as part of any Employment Land Review/Strategic Housing Land Availability Assessment are considered.

The search is based on a minimum site area of 8 ha, which is the minimum area required to accommodate the largest unit for which detailed planning permission is sought. Other site requirements include access to a motorway junction and strategic road network, a workable topography and location within flood zones 1 or 2. Sites meeting these requirements were then assessed in terms of their deliverability, taking into account their availability, physical constraints and policy constraints.

Four potential sites were identified that met the minimum size and site requirement requirements, namely:

- Plot 3000, Ashton Moss, Tameside;
- Little Moss/Ashton Moss, Tameside;
- Mottram North, and;

- Land east of Bredbury Industrial Estate (the application site).

Members will note that the only site that sits within the SMBC boundary is the application site before you and would provide for the benefits to the borough described throughout this report

Plot 3000, Ashton Moss, Tameside:

The site is located within 400m of stops serving a local bus route. It lies adjacent to Ashton West Metrolink Station and is 1.1km from Ashton Railway Station. It is located adjacent to the settlement of Ashton-under-Lyne and therefore has good access to a local labour force. There is a population of 15,700 within 1km of site boundary. The site is not located adjacent to a sensitive use and is not subject to environmental designations.

The site is identified as a Regional Investment Site in the adopted Tameside UDP (Policy E1) and is currently being marketed for employment use. However, it is subject to a number of constraints including several metres of peat which requires extensive remediation, the potential relocation of the existing sports facilities and radio/telecoms masts, which would have a significant impact on the development timeframe.

The issue with peat on the site is so fundamental that development of the site is not viable without public sector funding, and in 2011 funding was unsuccessfully sought to remediate the site. Given the nature of the remediation required the works would take in the region of 3-5 years to complete. The site has been marketed extensively over the last 10 years without success which indicates the potentially insurmountable constraints.

Little Moss/Ashton Moss, Tameside:

The site is within 400m of the nearest bus stop on Lord Sheldon Way. It lies 0.15km from Ashton Moss Metrolink Station and 1.4km to Guide Bridge Railway Station. The site is located adjacent to the settlements of Ashton-under-Lyne and Droylsden and therefore has good access to a local labour force. There is a population of 31,500 within 1km of site boundary. The site and surroundings are subject to a number of environmental designations. The Hollinwood Branch Canal SSSI runs along the northern boundary of the site. Listed buildings within the site include the Grade II* Listed Buckley Hill Farmhouse, Lumb Lane, Grade II Listed Barn to west of Buckley Hill Farmhouse, Lumb Lane (south-east side). There is also an extensive group Tree Preservation Order (TPO) at Jaum Farm.

The site currently comprises Green Belt land. The site is subject to environmental designations including Listed Buildings and TPO trees within the site, and a SSSI along the northern boundary which may restrict development potential. A number of Public Rights of Way cross the site and would need to be suitably accommodated or re-routed as part of any development proposals.

The Ashton Moss West site (on which employment development is envisaged under the GMSF Allocation GM38) requires remediation (including a strategy for the removal and relocation of the peat on the site) which would delay the development of the site. Given the size of the site, this delay is likely to be extensive. Indeed, the

revised draft GMSF (2020) sets out that one of the principle barriers to development on Ashton Moss West is the volume of placed material present and other geotechnical considerations. It is acknowledged that contamination testing, gas monitoring and extensive ground investigation and analysis would be required in order to produce a detailed earthworks assessment and remediation strategy prior to development taking place. This is clearly a significant barrier to the development of the site.

A number of Public Rights of Way cross the site and would need to be suitably accommodated or re-routed as part of any development proposals.

Given the time required to address the constraints identified, it is unlikely that the site would be developable within 12 months.

Mottram North:

The site is located 3.9km from the nearest major settlement (Hyde) and has a population of 6,400 within 1km of site boundary. It was therefore discounted due to its separation from a settlement with a large local labour force. The other three sites were then assessed to determine their suitability for accommodating the development. A summary of the sites is set out below.

Land to the east of Bredbury Industrial Estate (Application site):

The site is approximately 30m to nearest bus stop on Ashton Road and 1.3km from Brinnington Railway Station. The site is located adjacent to the settlement of Bredbury and therefore has good access to a local labour force. There is a population of 11,700 within 1km of site boundary. The surrounding area is subject to environmental designations. There is one listed building (grade II) on adjacent land and Botany Mill Wood SBI lies immediately adjacent to the site.

The site currently comprises Green Belt land. It is identified as a part of a wider strategic employment allocation for B2 and B8 floorspace in the 2020 revised draft GMSF (Policy GM Allocation 31).

The site is not subject to any physical or environmental constraints which would preclude development for the proposed use. The existing public rights of way within the site can be accommodated or suitably diverted

The site is available for development immediately and is capable of development within 6 months of the necessary planning permissions being granted.

The Alternative Sites Assessment discounts Plot 3000, Ashton Moss and Little Moss/Ashton Moss due to the site constraints which would require significant time to resolve.

The applicant concludes that the application site is the only site capable of delivering the proposed development.

In recognition of the application site as Green Belt, the applicant has also given consideration to disaggregation of the site over a number of smaller developments, including the redevelopment/refurbishment of existing employment units.

The SIMA includes an availability schedule for units across the borough. Out of a total of 747,043 sq.ft of available floor space, only two units exceed 4,500 sqm. The first unit is Hilti on the Bredbury Park Industrial Estate. However, this unit has an unusually high office content of 23.5%, and the applicant therefore considers that this property will have a very limited occupier demand due to its bespoke nature. The second is Welkin Mill in Bredbury. However, the available units are located in a multi-storey, multi-occupied Mill premises in a number of individual units which do not provide industrial accommodation suitable for modern occupational requirements. As such, neither of these sites are considered suitable to accommodate even the smallest units proposed at Bredbury Gateway. If these units were converted, they would only deliver two of the smaller units which are proposed on the application site and the same benefits would not be achieved.

The ASA looks at sites identified within the 2018 Stockport Employment Land Review and considers whether any are suitable for the proposed development. It concludes that there is no other available site in Stockport that could accommodate a single unit of even the minimum size threshold of 4,500 sqm. Even if there was the ability for the existing vacant unit on Bredbury, that would only provide for a small amount of the overall need that has been demonstrated by the applicant.

The applicant notes that there are a large number of poor-quality industrial areas in Stockport, but despite this occupancy levels are good. To refurbish and upgrade these units would require significant investment and could not be done in a way that would secure the same level of economic growth and the delivery of jobs within the borough.

The applicant notes that there is a particular need for a large scale industrial/distribution development and that the logistics industry benefits from clustering business and networks together to allow stronger relationships between suppliers.

The applicant has advised that whilst the development is seeking to meet the significant demand that exists for large scale units in excess of 100,000 sqft (9,000 sqm), the lower parameter of 4,500 sq m is proposed in order to maintain flexibility and ensure that the development can respond robustly to future market conditions and occupier demand. It is clear from the comments of the policy officer that there is a clear need within Stockport for the largest sized units, over 9,290sqm, and the applicant has also demonstrated a lack of suitable and available alternative units in excess of 4,500sqm to meet demand. Furthermore, it is accepted that there are no alternative sites within Stockport which could accommodate units of the size required to meet this need.

Economic benefits

The economic benefits are set out with the ES (Chapter L) and the Employment and Skills Note (January 2021).

The applicant has highlighted that while unemployment and deprivation levels in Stockport as a whole are relatively low, there are clear variations at a sub-local authority level, especially having regard to Brinnington. Brinnington is located to the

west of the application site and comprises an area of 1950/60's Local Authority housing. It is one of the Council's priority areas for investment and regeneration. While job levels in Stockport increased by 9.6% between 2015 and 2018, Brinnington experienced a decrease in the number of jobs from 700 to 600. The level of economically active residents (engaged in or seeking employment) living in Brinnington is also far lower than Stockport, Tameside and the north west region, at 60.2% compared to 81.6% for Stockport and 78.9% for the north west.

Unemployment rates in Stockport between 2018 – 2019 were generally lower than elsewhere in the north west but there are clear variations at a sub-regional level, with rates significantly higher for Brinnington. In 2011 11.3% of Brinnington residents were unemployed compared to 3.9% for Stockport and 4.4% for the north west.

The estimated net annual household income in 2015/16 for Brinnington was also significantly (-38.4%) lower than the average for Stockport and was the lowest of any sub-local authority areas within the borough. Less workers are engaged in highly skilled roles, 15.7% (2011) compared to 52.6% for Stockport (2018), and 42.5% of the working age population in Brinnington held no formal qualifications. This compares to 4.9% for Stockport and 9.1% for the north west.

Deprivation levels in Brinnington are also significantly higher than other areas within Stockport and England as a whole. Using the Index of Multiple Deprivation all four of Brinnington Lower Super Output Areas rank in the 10% most deprived in Stockport and the 5% most deprived in England. Two of these areas are the 2nd and 3rd most deprived in Stockport and the 69th and 90th most deprived nationally out of 32,844 areas. In addition, the application site itself is located in an area that is in the 16% most deprived in England.

The applicant considers that the proposed development could help address this localised deprivation.

The applicant has highlighted in their submission that the development is likely to generate:

- 126 full time equivalent (FTE) construction jobs plus 189 indirect jobs;
- Between 949 and 1,515 net additional FTE jobs locally, depending on whether the site is developed wholly for B8 use or a mix of B8 and B2 use.
- An additional £43 million to £104 million contribution to the economy (GVA).
- Additional business rate revenue of up to £1.36 billion.

In the period between March 2015 and March 2020 data published by Novis on job seeker allowance by occupation shows that the majority of job seekers within Brinnington and Bredbury were seeking roles within sales occupations but the second most sought after roles are those within elementary trades, plant and storage related sectors, i.e. including those typically generated by B2/B8 uses. The applicant considers that this demonstrates that there is a local labour market for the roles that would be created by the development.

A significant number of roles within the development, particularly in the case of B8 uses, can be undertaken without specific skills and limited training requirements. Therefore, there is no reason why those residents seeking sales roles would not take

an alternative job within a warehousing facility. At least 50% of the development is likely to accommodate B8 uses and provide a proportion of lower skilled jobs.

The development would also provide training opportunities for local residents both during the construction phase and once operational. These opportunities would help to improving the high levels of education deprivation experienced in the areas of Brinnington, which is within the 1% most deprived in England.

The applicant has compared data from March 2020 with the data from October 2020 to assess whether the Covid-19 pandemic has had an impact on occupations sought. The data shows that there has been a dramatic increase of 460% in the number of people seeking jobs in the Elementary Trades, Plant and Storage Related Occupations sector in October when compared to March. There has also been a notable decrease in the number of people seeking jobs in both the sales and administrative occupation sectors. Whilst job seekers might return to the more traditional occupations post pandemic, the applicant considers that the shift towards warehousing and logistics roles is unlikely to recede.

The applicant envisages that construction would generate:

- 3 work placements
- 11 jobs for unemployed individuals
- 5 careers advice events
- 417 training weeks on site
- 25 workforce qualifications achievements
- 6 training plans

The number and type of jobs during the operation phase will however depend on the end user. The applicant proposes that an Employment and Skills Scheme focussing on creating jobs for local people would be secured by a condition. The scheme would ensure that future occupiers must recruit a proportion of their staff locally. Apprenticeship and training opportunities would be provided during both the construction and operation phases.

Covid-19 Pandemic

The Covid-19 pandemic is a material consideration in respect of the need case for the development. Given the uncertainties that exist around the pandemic it is considered that it should be given limited weight in the planning balance. The applicant has referred to this in the Planning Statement as summarised below:

- The considerable economic benefits that would be generated by the development are particularly important in light of the significant economic consequences of the pandemic.
- The pandemic is likely to result in further unemployment and commercial / economic pressures across a wider variety of sectors and industries with a significant and ongoing impact upon the economy.

- In light of the unprecedented economic circumstances caused by the pandemic, it is now more important than ever that economic growth is facilitated wherever possible and in sectors of strength that have not suffered as severely as others.
- The logistics industry has a unique position in serving a wide range of other sectors, which means that it is considered to be a relatively low-risk industry in terms of responding to economic shocks and is one that offers a level of job security not typically afforded by other industries.
- This is further supported by delivery drivers' status as key workers during the Covid-19 pandemic.
- For this reason, as well as the wide range of skill levels and occupations it supports, the logistics industry is often touted as the primary alternative to lost manufacturing capacity during economic restructuring.
- The strength of the logistics sector in spite of the pandemic is reflected by the continuation of high take up rates of premises through its duration to date.
- Whilst other forms of development are suffering as a result of the pandemic, the logistics sector is strengthening, with demand greater than ever. Bredbury Gateway will create an opportunity in Stockport to facilitate economic growth in the wake of the pandemic, creating secure jobs for residents of both Stockport and Tameside.

Other benefits

In addition to the key areas outlined above the development would deliver the following benefits that need to be considered in the overall assessment of the application. The benefits are primarily benefits that would assist the wider area allowing for safe access to/through the area, together with assisting the local community and visual appearance of the area:

- 1) Creation of a 32-space overspill car park for the Stockport Sports Village to address capacity issues that result in on-street parking issues on nearby residential streets.
- 2) A new public bridleway/footpath to the north of the site, running close to the bank of the River Tame.
- 3) Junction improvements to reduce the impacts on the existing highway network and improve the functioning of the network.
- 4) Off-site improvement works to enhance pedestrian and cycle links between the site and Brinnington and Woodley, allowing easy access for local workers.

Officer assessment

As set out above there are three factors which it is considered appropriate to consider in assessing whether 'very special circumstances' exist. Firstly, whether there is an essential objective which the proposal seeks to address, secondly

whether that objective could be met in a less harmful way and lastly whether the development would meet the essential objective and whether doing so would clearly outweigh the harm to the Green Belt and any other harm. The principal 'very special circumstances' put forward by the applicant are the need for large scale industrial/distribution buildings, the lack of alternative sites and the economic, social and environmental benefits of the development.

Is the objective of the development essential?

The provision of a strong, responsive and competitive economy lies at the heart of the NPPF. Para.80 states that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

The NPPF requires that planning decisions should recognise and address the specific locational requirements of different sectors. Para.82 states that provision should be made for a range of specific sectors, including storage and distribution operations at a variety of scales and in suitable locations.

Core Strategy Policy CS7 notes that industrial and warehousing uses are likely to generate heavy goods traffic and should be directed to employment areas with good access to the National Strategic Road Network and Local Primary Road Network. The policy specifically mentions the Bredbury Industrial Area in this regard, however this relates to the allocated employment area rather than the Green Belt land adjacent to it and the subject of this application. The policy further also notes that there are benefits of clustering of employment uses and states that the Council will seek to build on those benefits.

The 2018 Employment Land Review (ELR) provides the most recent assessment of employment land need within Stockport. In relation to industrial demand it identifies a need for 0.25ha per annum (Para 9.49), which is not a significant in quantitative terms. It does however note that there is a qualitative need, particularly in terms of demand for larger units. The ELR specifically identifies the possibility of utilising land at Bredbury Gateway, subject to Green Belt and transport issues.

The Employment Topic paper which supported the 2020 GMSF identifies a total industrial and warehousing supply requirement for the plan period of 5,064,000 sqm, and a shortfall of 2,437,000 sq m across the Greater Manchester area. Whilst it is appreciated that Stockport no longer form part of the GMSF, it is clear that there is a need for such development as evidenced from the background research work undertaken for the GMSF.

It is considered that there is a clear need for large scale industrial/warehousing units in the Stockport area, as demonstrated through the evidence base of the GMSF, the 2018 ELR and the evidence submitted by the applicant. It has been demonstrated that there is a high level of pent up demand for such units, and that the lack of high quality large units has resulted in businesses being forced to relocate outside the Stockport area. In addition to the identified need in Stockport, the proposals would support opportunities for businesses within the borough to expand/relocate, specifically relating to existing businesses and those located within the area covered

by the Strategic Regeneration Framework, importantly retaining jobs and businesses within the borough.

It is considered that the need for large scale industrial and warehousing units should be afforded substantial weight when assessed against harm to the Green Belt and that the applicant through their submission has demonstrated need for such units.

There is also clear evidence of high unemployment and deprivation levels in the immediate vicinity of the site, particularly in Brinnington. The development would create jobs during both the construction and operational periods, and these would be both targeted and available to local residents. The development would also generate a significant contribution to the local and regional economy, which is of particular importance to ensure economic recovery following the Covid-19 pandemic. The Councils Head of Economy, Work and Skills has emphasised the important and significant contribution the site could make to the local economy when trying to recover from the impact of the pandemic, especially noting the doubling in unemployment levels, and particularly youth unemployment for 16 – 25 year olds, as well as the over 50s. In addition it is noted that the site would also support business to cope with the impact of changes to the economy caused by Brexit by providing good quality space for those businesses that may need to return operations to the UK because of the logistics and financial implications of changes to tariffs with Europe.

Members should also note that minimum construction employment and skills targets have been incorporated into the Employment and Skills Note and that the applicant has committed to engaging with the Council to develop an Employment and Skills Agreement to deliver on these construction targets and also to secure end user jobs and skills opportunities. This is again supported by the Head of Economy, Work and Skills who further identifies the geographic location of the proposal in supporting some of the boroughs most deprived communities, as well as those in Tameside, offering local employment for people who will struggle to afford their own vehicle or the cost of long journeys on public transport. With walking and cycling to work on the site being a realistic prospect for local people, emissions from travel to work will be reduced as well as delivering health benefits for the individuals.

Officers consider that the socio-economic benefits should be afforded moderate to substantial weight in the overall assessment of the proposal.

As such it is concluded that the first test of establishing whether development is designed to meet an essential objective has been satisfied.

The other benefits brought by the scheme (as identified above) are considered to carry some, but limited weight in the overall planning balance, however would clearly support the wider population and existing industrial estate. The benefits would ensure that wider choice and safe access is provided to the wider area, and that additional parking would be available to support the Sports village, negating the need for all users to approach through the existing residential streets and providing a more direct and convenient location for those approaching from the east.

Could the objective reasonably be met in a less harmful way?

The analysis conducted by the applicant looks at a number of alternative sites, both outside and within the Green Belt, that could potentially accommodate the development. It is concluded that alternative sites have been fairly and reasonably discounted as being either unsuitable, unavailable, or undeliverable. It is therefore concluded that there are no alternative non-Green Belt sites or less harmful sites within the Green Belt that could accommodate the development as a whole or through disaggregation across a number of smaller sites. It is clear that there are no suitable, available or deliverable sites within Stockport that could accommodate the proposed development.

It is also necessary to consider whether the application site could be developed in a way to reduce the impact on the Green Belt. As evidenced by the Stockport ELR there is not a significant quantitative shortfall of employment land within the borough, and it is therefore possible that reducing the site area could achieve some of the same benefits but with a lesser impact on the essential characteristic of the Green Belt.

Members will however note that the scheme before you has undergone significant changes since the application was first submitted. The floor area of the development has been reduced by 20%, from 116,129 sqm to 93,184 sqm, and the net developed area within the site reduced by 15%. This has addressed many of the concerns raised by residents and allowed for the landscape buffer between the site and the River Tame to be increased from 10m to over 50m in width. These changes have significantly reduced the harm to the Green Belt and resulted in greater benefits to be discussed later in the report. In addition the taller of the buildings have been located adjacent to the existing industrial area to reduce overall landscape impact into the Tame Valley.

Members will note that as part of the application a significant scope of works to the highway network and environmental benefits are proposed. The applicant has advised that the quantum of development proposed is the minimum that can be provided whilst maintaining the full provision of off-site highways mitigation package, the onsite infrastructure, along with the wider package of environmental benefits. If the proposed quantum of floorspace were to be reduced further, then the deliverability of these improvements, would be compromised. The wider benefits are considered to be to the benefit of the wider local population, those commuting and the existing industrial area, thus supporting the economy in the area as a whole.

Taking the above factors into account it is considered that all reasonable steps have been taken to minimise harm to the Green Belt while still allowing the objectives of the development and adequate mitigation to be achieved.

Whilst it is noted that the final version of the GMSF prior to Stockport withdrawing reduced the extent of the developable area / quantum of floorspace to circa 60,000 square metres. However, this plan did not proceed as it was not supported by Members of the Council. As such it is not considered that it should be given any weight in the assessment of this application which must consider the individual merits of this scheme and submitted supporting information.

Conclusion

For the reasons set out above, and having full regard to the concerns of residents, Tameside Council, Tameside Councillors, William Wragg MP and Andrew Gwynne MP relating to the loss of Green Belt, need for the development and impact, it is considered that the provision of large scale industrial and warehousing units, with clear economic and regeneration benefits, is an essential objective, and that alternative less harmful ways of delivering these benefits have been reasonably discounted. The NPPF is clear that 'significant weight' should be placed on the need to support economic growth and productivity, and that planning decisions should help create the conditions in which businesses can invest, expand and adapt (Para.80). It is therefore considered that the first two requirements of a very special circumstances case, as outlined above, are satisfied.

The need for large scale industrial and warehousing units should be afforded substantial weight when assessing against harm to the Green Belt. Substantial weight should also be given to the lack of alternative sites evidenced in the submission and moderate to substantial weight should be given to the economic benefits of the development. The other benefits outlined by the applicant should, in officer opinion, be afforded some but limited weight in the overall planning balance.

Landscape and Visual Impact

The applicant has assessed the landscape and visual impacts as part of the ES, informed by a Landscape Impact and Visual Impact Assessment (LIVIA). The ES describes the baseline conditions of the site and surroundings, examines the likely environment effects of the development, the mitigation measures required and the likely residual effects after mitigation. It examines the effects on the landscape as a resource in its own right and the visual effects on specific views and the general visual amenity experienced by people.

Significant concerns have been raised by objectors to the scheme identifying that the development would detrimentally impact the openness of the valley, would result in adverse impacts on the character of the area, that the development is overdevelopment and the scheme would dominate the area. There is no doubt that development on the site would impact on the overall appearance and character of the area, however the landscape and visual impact needs to be assessed both individually and cumulatively as part of the wider assessment of the site and forms only part of the wider planning balance to be discussed.

The ES notes that the site is located within the 'Manchester Conurbation' National Character Area (NCA55) and within Landscape Character Area (LCA) E; Tame Valley and Brinnington East as defined by the 'Stockport Landscape Character Assessment and Landscape Sensitivity Study'.

The Site does not sit within, or adjacent to, any landscape designations such as National Parks, Areas of Outstanding Natural Beauty or Special Landscape Areas.

The site comprises a number of pastoral fields, separated by trees and hedgerows, with areas of rough grassland, woodland, and two farms. There is some opportunity for views out of the site from the PRow in the south and centre of the site towards

wooded high ground to the north, and settlement and pasture on rising land to the east. However, views are typically contained to a large degree by field boundary vegetation and by settlements to the southwest and southeast. Views from and of the site typically include residential or industrial development. It is noted that there is recreational activity associated with the site.

A visual appraisal has been undertaken to establish the approximate visibility of the site from surrounding locations and receptors. A series of 29 photo viewpoints have been selected which support this analysis.

The ES notes that following completion of the development, the character of the site will have changed to a wholly developed one with some interspersed areas of formally maintained green space. The perimeter tree belts are proposed to remain largely intact, with additional structural planting introduced to enhance and strengthen them, but all internal vegetated field boundaries would be removed. The topography would be altered following regrading of the site to create the proposed building plot levels/development platforms. Views from PRow crossing the site would change from agricultural to industrial, and although often flanked by hedgerows as existing, views would become further enclosed by large-scale built form. Visual receptors at a short distance are already influenced by built development, and this would be increased by the proposal. These receptors may observe alterations to the skyline, as it is likely that the proposed buildings will be visible beyond the intervening built form. Long distance receptors will experience an increased urbanisation of their views along the Tame Valley corridor, and the Bredbury Industrial Estate will become more prominent as a result of the notable increase in its extent. It is however important to remember that the majority of views towards Bredbury Industrial Estate will already have the urbanised backdrop of the existing Industrial Estate.

The ES considers the potential effects on landscape character and the visual effects of the development during construction and when operational. It assesses whether the effect would be adverse or beneficial and the overall significance of the effect. The development is found to have adverse effects in terms of both landscape character and visual impact, with the effects ranging from minor adverse at a district level to a moderate to major adverse impact on the site itself, PRow within the site and views from houses closest to the site boundary of the site.

The applicant is proposing a series of mitigation measures to minimise the impact of the development including:

- Retention of hedgerows and trees along the boundaries to provide screening from adjacent roads and settlements.
- Significant planting and habitat creation along the site boundaries at an early stage.
- Erection of hoarding around the work area during construction and storing materials and machinery tidily.
- Using lighting only when necessary during construction and designing all permanent lighting to prevent light pollution and glare.
- The parameters plan for the development has been designed in response to the local landscape character in order to integrate the development and where possible enhance the area.

- Tree belts, woodland and hedgerows are incorporated into the development and enhanced as part of the landscape proposals.
- Inclusion of incidental green space, links and corridors.
- Careful consideration of building heights and scale.

The ES then identifies residual effects after mitigation. In terms of the landscape impact the following conclusions are made:

- The landscape effects will lessen over time with the successful establishment and maturing of the proposed planting.
- The main benefits in landscape terms will arise from the maturing of the perimeter landscape and planting proposals which will assist in assimilating the development proposals and will deliver other related public open space and access benefits.
- The long-term effects of the proposed development on the site are considered to be '*Moderate Adverse*', with a '*Minor Adverse*' long-term effect on its setting.
- '*Negligible Adverse*' effect on landscape character at national level.
- '*Minor Adverse*' effect at district level.
- '*Moderate - Major Adverse*' effects on the site and its immediate context. The effect will be reduced by the landscaping but not sufficiently to reduce the level of effect on the landscape character of the site.
- '*Minor Adverse*' effect on the site's setting.
- '*Moderate – Major Adverse*' effect on landform due to the permanent change to the topography of the site.
- '*Moderate Adverse*' effect on trees, woodland and hedgerows given that new planting and habitat creation is proposed.
- '*Negligible Adverse*' effect on the water features/courses. There will be no direct landscape effects on the River Tame.

The keys conclusions of the visual impact assessment are as follows:

- The successful establishment and maturing of the planting will provide some localised benefits to residents in close proximity to the south east boundary and users of the PRow.
- The maturing of the perimeter woodland, tree and hedgerow planting will assist in screening and filtering any available views towards the highest parts of the units.
- As planting along the north-eastern boundary matures it will assist in visually integrating the proposals in conjunction with the existing woodland along the slopes to the south of the River Tame.
- '*Moderate/Major Adverse*' effect on public footpaths within the site. Users will pass through the development along re-directed routes with views changing from farmland to industrial. The impact will reduce over time as the landscaping establishes.
- '*Moderate Adverse*' effect on Turner Lane. The lane will be removed and redirected through the development. Users will experience a change in view but by Year 15, the landscape setting, in which the diverted route of Turner Lane sits, will have sufficiently established to provide some degree of visual mitigation.

- ‘*Minor Adverse to Moderate Adverse*’ effect on footpaths adjacent to the site due to a notable change in view which will reduce over time as the landscaping establishes.
- ‘*Negligible Adverse*’ effect on the Tameside long distance trail.
- ‘*Negligible*’ impact on views from Haughton Green. It is anticipated that only glimpses of the built development will be seen from windows on upper floors facing southwest. During summer, when trees are in leaf, these glimpsed views of the proposed built development will be further reduced.
- ‘*Moderate Adverse*’ effects on also three residential tower blocks within Haughton Green (Fitzgerald Court, Southey, and Castleton). Residents would experience oblique views of the proposed development, seen in the context of Bredbury Industrial Estate. By Year 15, the proposed planting will help the built development to assimilate better with its surroundings, however from elevated viewpoints this will provide only very limited screening.
- ‘*Negligible/Minor Adverse*’ effects on views from Brinnington.
- ‘*Moderate/Minor Adverse*’ effect on views from 14 properties on Mill Lane. Partial views of the proposed development can be achieved from properties at the northern end of the road. The development would be seen either beyond the park homes, or through tree canopies. A belt of screen planting is proposed along the western site boundary which, over time, would help to soften views.
- ‘*Moderate Adverse*’ effects are identified on views from properties at Castle Hill. North west facing homes have direct views into the site and these views will alter from grassland and pasture to large scale industrial buildings. A belt of woodland planting, proposed on the southeast boundary of the site will, in time, help to soften views of the development.
- ‘*Moderate/Minor Adverse*’ (*potential for Moderate adverse from northern-most dwellings*) effect on properties within Lowick Green. Up to 10 residences may have oblique or partly screened views of the proposed development, seen alongside the existing industrial estate. The immediate foreground would remain undeveloped and proposed units would sit beyond a strengthened vegetated site boundary.
- ‘*Moderate/Minor Adverse*’ effects on views from residential properties on Arden Road. Where views are available these would be oblique in nature and would look towards buildings within the north of the Site. Residents would see large scale units at short distance beyond enhanced boundary vegetation.

The applicant site is located within Tame Valley Landscape Character Area as defined by SUDP Policy LCR1.1. This policy confirms that development in the countryside will be strictly controlled and will not be permitted unless it protects or enhances the quality and character of the rural area. Where development is acceptable in principle it should be sensitively sited, designed and constructed of materials appropriate to the landscape quality of the particular area. Development proposals in the countryside should protect or improve recreational land. These objectives are also emphasised in SUDP Policy LCR1.1a which relates to defined areas of urban fringe considered to be of value in terms of landscape, ecology and the important role they play in meeting the need for recreation in a natural setting. The objectives are also reflected in Core Strategy Policies CS8 and SIE3. Para. 170 of the NPPF states that planning decisions should contribute to and enhance the

natural and local environment by protecting and enhancing valued landscapes and recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services.

The description of the Tame Valley Landscape Character Area emphasises the importance of protecting and enhancing the area, which is a valuable resource for many urbanised parts of the borough, and the Stockport Landscape Character Assessment 2018 highlights the character area as being highly sensitive to new development. The development of what is currently open agricultural land would therefore clearly have an adverse impact on the Landscape Character Area. It would also have an adverse effect on users of the public rights of way which run through and adjoin the site. While the routes would be relocated to retain access, users would suffer from experiential losses due to the loss of the footpath's natural setting.

It is considered that the industrial use of site would have a negative adverse effect on the landscape character of the site. The most notable change would be the change from agricultural fields with hedgerow boundaries to large scale employment units. However, the effects are considered to be largely localised due to the site's setting within what is a largely urban area. The effects would lessen over time as the landscaping establishes to integrate the development within its setting.

In terms of the visual effects, the most significant effects would be on users of PROW within the site and residents living within Castle Hill Park, Lowick Green and on Mill Lane. Landscaping around the site boundaries would reduce the impact to some degree over time but in the long term the development would result in a fundamental change in view for a limited number of residents.

Building within the site would be up to 22m in height. The applicant has advised that the building heights are required to meet the institutional standards for industrial and distribution buildings of this quantum of floorspace. To minimise the impact on the River Tame and views from the recreational routes that run along this corridor, the highest buildings would be located in the south west part of the site, adjacent to the existing industrial estate and would be read in the context of the existing built form of this area. In addition, a substantial landscape buffer zone, in excess of 50m in width, would be provided between the developed area and the site's north east boundary. As this planting matures it will assist in visually integrating the development through further screening in conjunction with the existing woodland along the slopes to the south of the River Tame. The landscaped area, comprising the existing river corridor and the proposed landscape buffer, between the proposed development and the residential area of Tameside beyond would measure approximately 250m in width.

The harmful impacts of the development in landscape and visual impact terms should be given moderate weight in the overall planning balance. This is considered a fair weighting given the need for a proportionate response to harm to reflect the importance and status of local landscape designations relative to the 'great' weight that must be afforded to the landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty required by NPPF Paragraph 172.

A condition is recommended requiring the development to be carried out in full accordance with the landscape and visual impact mitigation measures set out in the ES.

Ecological impacts and mitigation

Core Strategy Policy SIE3 sets out the Council's development management policies on protecting the natural environment stating that net losses of biodiversity and geodiversity will be prevented using a hierarchical approach to conserving and enhancing designated sites and habitats. It goes on to state that applications for development that would harm the borough's biodiversity will be determined in accordance with the key principles set out in former government policy (PPS9). It sets out the requirements for biodiversity enhancements through the development of green infrastructure networks to improve connectivity between habitats. The policy also states that planning applications should identify mitigation measures that keep disturbance to a minimum and provide alternative habitats to sustain at least the current level of population as well as setting out a long-term management plan for the site.

The NPPF (Par.170) reflects the objectives of this policy, stating that planning decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. Para. 175 states that when determining planning application that if significant harm to biodiversity cannot be avoided, or as a last resort compensated for, then planning permission should be refused.

Members will note from the objections received that many of the concerns raised relate to the loss of habitat and impact on biodiversity from the proposed development.

The ecological impacts of the development are assessed in Chapter H of the ES and the accompanying Ecological Assessment and Badger Survey. The assessment is based on a series of desktop and field studies including an ecological assessment, bat surveys, badger surveys, hedgerow assessment and great crested newt assessment. The ES sets out the baseline conditions then sets out the effects of the development and the proposed mitigation measures.

The site comprises semi-improved grassland, with tall ruderal vegetation, scrub, hedgerows, trees, ponds and a farmyard with numerous buildings. It is not subject to any statutory or non-statutory designations. Three statutory protected sites lie within 1km, the closest being Hulmes and Hardy Woods and Lower Haughton Meadows Local Nature Reserve. There are 11 non-statutory protected sites within 1km of the site, including Botany Mill Wood Site of Biological Importance which lies directly adjacent to the northern boundary.

Buildings and trees within the site have been surveyed for bats and found to have low to negligible potential to support roosting bats. Bat activity surveys have also been carried out and found no activity within the site but evidence of foraging along northern and southern boundaries.

Badgers are protected under the Protection of Badgers Act, 1992. This makes it an offence to kill or injure a badger or to damage, destroy or obstruct access to a sett. It is also an offence to disturb a badger while it is in a sett. Two active badger sets have been found within the site and these would be lost as a result of the development.

Great Crested Newt are protected under Section 9 of the Wildlife and Countryside Act 1981 (as amended) and The Conservation of Habitats and Species Regulations 2017. There are three ponds within the application site with a further four within 250m of the site boundary. These have been assessed for their suitability as breeding habitat for Great Crested Newt. It is considered unlikely that Great Crested Newts are present on site.

A Biodiversity Impact Assessment has been undertaken to ascertain the level of habitat lost or gained as a result of the development. The development would result in the loss of the vast majority of the existing habitat from within the site, but new planting is proposed to mitigate for this loss. Despite this on-site mitigation there would still be a net habitat loss of 39% and a net hedgerow loss of 19%.

Off-site mitigation is therefore proposed in the form of a commuted sum of £96,000 towards habitat improvement at Woodhall Fields and Reddish Vale Country Park and the management of this habitat for 30 years. Woodland Fields are located 2.35km to the south west of the site and comprise 8.5ha of neutral grassland habitat. Reddish Vale is located 90m east of Woodhall Fields and covers an area of 3.6ha. It is proposed to improve the condition of these existing habitats, including the creation of a new pond, improvements to existing hedgerows and the planting of new hedgerows. The assessment concludes that after mitigation there would be a 10.32% net habitat gain and a 10.00% gain in hedgerows.

There is no opportunity to retain the existing sets within the development; therefore, these will need to be closed under a license from Natural England. Mitigation measures are set out within a confidential Badger Survey and Mitigation Strategy. The proposed badger mitigation includes provision of a new replacement sett and badger tunnel to maintain connectivity to the south west of the site. The retention of woodland on the site boundaries allows badger foraging land to be retained and additional foraging land would be created within the on-site landscaping.

The potential effects of the development during construction and operation are set out within the ES. During the construction phase these impacts include run-off to the River Tame, noise, dust and light pollution to the woodland, damage to the Botany Mill Wood SBI woodland edge, loss of hedgerows and bat foraging habitat, impact on badgers and loss of bird nesting habitat. Once operational the development could result in ongoing disturbance to bats, badger and nesting birds.

The ES proposes a series of mitigation measures to reduce the impact of the development including:

- The implementation of a Construction Environmental Management Plan (CEMP) to prevent run-off, lightspill, noise and dust pollution from affecting

Hulmes and Hardy Woods, Lower Haughton Meadows LNR and Botany Mill Wood.

- A habitat buffer zone designed into the northern boundary of the site.
- Protection of retained habitats during the construction phase by Root Protection Areas, a CEMP and appropriate buffer zones.
- A sensitive lighting scheme, to protect the potential bat foraging and commuting features.
- Mitigation for badgers will be implemented prior to any construction taking place and the mitigation zone will be protected during construction.
- A site wide Habitat Management Plan to include monitoring and maintenance of the sensitive lighting scheme, pollution monitoring, habitat management and protection of new and retained habitats.
- Monitoring of retained habitats that are of value to nesting birds as part of the Habitat management Plan.

The residual environmental impacts following mitigation are assessed as follows:

- *'Negligible'* effect on protected sites, habitats, bats and nesting birds.
- *'Moderate'* effect on badger.

The application has been assessed by Natural England, the Greater Manchester Ecology Unit and the Council's Nature Development Officer whose comments are set out above. No objections are raised by any of these. The Nature Development Officer and GMEU advise that the proposed commuted sum should be amended to include the cost of hedgerow creation off-site. The applicant has confirmed that this cost has been included.

The Cheshire Wildlife Trust have raised concern regarding the level of habitat mitigation proposed and whether this achieves a 10% net gain in biodiversity. The reference to 10% is taken from the 2019 Environment Bill which refers to a 10% net gain in biodiversity after development compared to the level of biodiversity prior to development taking place. However, the Environment Bill is not, at this stage law and thus no such requirement exists to provide 10% biodiversity net gains as part of development proposals. Core Strategy Policy SIE-3 seeks to prevent net loss of biodiversity and this is consistent with the requirements of the NPPF which states that planning decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity. Stockport's Nature Development Officer has confirmed that she is satisfied that adequate mitigation would be provided. Subject to recommended conditions and a legal agreement to secure the off-site mitigation it is considered that the development would not have an adverse impact on protected species and will provide for enhancements to biodiversity in accordance with CS Policy SIE-3 Protecting, Safeguarding and Enhancing the Environment of the Core Strategy along with para's 170 and 175 of the NPPF.

Despite safeguarding the favourable conservation status of species and securing habitat enhancements, the proposals would nonetheless disturb and then result in the loss of habitat of protected species. Given the mitigation proposed, it is considered that the impact on ecology is neutral in the planning balance.

Impact on Trees

Core Strategy Policy SIE3 states that development proposals affecting trees, woodland and other vegetation which make a positive contribution to amenity should make provision for the retention of the vegetation unless there is justification for felling, topping or lopping to enable the development to take place. Even where there is a strong justification for a proposal the design should maximise the potential for retaining some mature planting, and replacement planting of appropriate species and covering a similar area should be provided within the site or nearby.

The impact on trees within and adjacent to the site is assessed in Chapter K of the ES and the accompanying Arboricultural Impact Assessment, Method Statement and Tree Survey.

There are nine individual trees, sixteen tree groups, one woodland and five hedges within the site, with further trees along the site boundaries. The ES sets out that the removal of these will initially have a '*moderate adverse*' effect but the impact will be reduced by the implementation of mitigation measures.

The application has been assessed by the Arboricultural and Habitats Officer whose comments are set out above.

Trees within the site are a mixture of low/medium value and therefore their loss is considered to be acceptable subject to replacement trees being planted. A detailed planting scheme has been submitted for the parts of the development for which detailed planning permission is sought and a Landscape Masterplan has been submitted for the other parts of the site. New trees would be provided at a level which exceeds those lost as a result of the development. The detailed planting scheme for the outline part of the development would be agreed when an application is made for the approval of the reserved matters.

To prevent damage of retained trees along the site's boundaries it will be necessary for protective fencing to be installed and for storage areas and compounds to be located outside the root protection areas of the retained trees. These measures can be secured by conditions.

Whilst the proposed development would result in tree loss on the site, subject to the protection of the retained trees and a fully detailed landscaping scheme, it is not considered that the proposed development will have an unacceptable impact. On this basis the proposal is considered compliant with CS Policy SIE-3 and the NPPF, and the impact on trees is considered neutral in the planning balance.

Noise and Vibration

CS Policy SIE3 seeks to prevent new development from being exposed to unacceptable noise impacts and to safeguard recreational and other activities within river valleys and other areas that are dependent on quiet conditions for their proper enjoyment from development that introduces unacceptable noise levels. It goes on to say that development that will result in an unacceptable impact on the occupiers of dwellings or other environmentally sensitive properties in terms of vibration will also not be allowed.

The NPPF (Para.180) sets out that new development should be appropriate for its location taking into account the likely effects of pollution on health, living conditions and the natural environment. Any adverse impacts should be mitigated and reduced and noise should not give rise to significant adverse impacts on health and quality of life.

Chapter E of the ES considers the impact of noise during the construction and operation phases. The assessment looks at the closest noise sensitive receptors, which are residential properties on Arden Road, Castle Hill, Mill Lane and Lowick Green. The noise environment at these locations is currently dominated by noise from the surrounding road network, the existing industrial estate and aircraft movements.

There are a number of residential properties within 100m of the site boundary and these properties could be affected by noise during the construction phase of the development. The ES divides the construction work into four phases and assesses the noise levels likely to be generated by each. A '*Minor Adverse*' impact is predicted at the worst affected receptor during the noisiest phase of the work. The impact of vibration has also been considered. Assuming pile foundations will not be required a '*Minor Adverse*' effect is predicted in the worst-case scenario.

During operation it is necessary for noise levels to be 5dB below the current background noise levels in order for the development to have a '*Minor Adverse*' effect at worst. A detailed acoustic model of the site has been produced to determine whether these levels can be achieved. Without mitigation the levels would be exceeded by noise generated from activity within the service yards, giving rise to a '*Moderate Adverse*' effect. Noise from HGV movements within the site, car park use and road traffic would have a '*Minor Adverse*' effect at worst.

A series of mitigation measures are set out including:

- Fitting silencers to machinery or using acoustic enclosures.
- Carrying out deliveries during normal working hours and routing deliveries to minimise disturbance to residents.
- Siting plant to minimise noise at residential properties.
- Using working methods that ensure vibration levels are minimised.
- Provision of acoustic barriers for the northern part of the site.

With the acoustic barriers in place the development is able to achieve the noise levels set out above and the effect of operational noise is reduced to '*Minor Adverse*'.

The application has been assessed by the Council's Environmental Health Officer whose comments are set out above.

Given that construction would last in the region of five years there would be a need to manage noise levels to ensure that nearby residents are protected from ongoing intrusive noise. Conditions can be used to ensure that a Construction Environmental Management Plan is submitted, and that construction is undertaken during normal working hours. Given that the application is in part outline, the detailed design may

be subject to change, and a further assessment of mitigation measures for the operation phase of the development should therefore be undertaken when an application is made for the approval of reserved matters.

Subject to the mitigation measures discussed above, it is considered that the impact of noise and vibration would be acceptable, and there would be no conflict with CS Policy SIE-3 and the NPPF. The noise and vibration impacts are therefore considered to have a neutral effect on the overall planning balance.

Air Quality

CS Policy SIE3 seeks to ensure that adequate levels of air quality are achieved within buildings and that development that would exacerbate existing poor air quality levels within designated Air Quality Management Areas (AQMA) will only be permitted where it is demonstrated that exacerbation will be mitigated.

At Para.181 the NPPF states that planning decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas.

An Air Quality Management Area (AQMA) has been declared on areas surrounding many of the main roads in Greater Manchester. The application site is not within this AQMA.

Chapter F of the ES contains an assessment of the impact of the development on air quality. The ES considers the potential impact of construction dust within 350m of the site and within 50m of roads used by construction vehicles, and the impact of increased road traffic on concentrations of nitrogen dioxide, PM₁₀ and PM_{2.5}. It looks at a number of receptors in the surrounding area, including residential properties adjacent to the site's boundaries.

Potential impacts of the development during the construction phase include dust from demolition and earthworks, vehicles travelling over unpaved ground, the handling of dusty materials, cutting activities and dust being tracked out of the site by heavy vehicles.

Mitigation measures are proposed to address these impacts and would be set out in a Construction Management Plan. With these measures in place the residual effects are judged to be '*not significant*'.

Traffic generated once the development operational is predicted to have a '*Negligible*' effect on nitrogen dioxide levels for all receptors near Castle Hill Park, at locations adjacent to the motorway and on Ashton Road. '*Slight Adverse*' to '*Moderate Adverse*' effects occur at locations in Bredbury, near Haughton Green and in Denton at locations where residential buildings are located less than 5m from a heavily trafficked road. Nitrogen dioxide levels remain below objective levels at all receptors. Annual mean concentrations of PM₁₀ and PM_{2.5} also remain below objective levels at all receptors, with the development having a '*Negligible*' effect on baseline levels. Operational air quality effects without mitigation are judged to be not significant.

The applicant's air quality assessment has been reviewed by the Council's Air Quality Management Officer who agrees with the conclusions.

The development is not considered to have any significant adverse impact on air quality and therefore accords with the NPPF and CS Policy SIE3, with a neutral weighting in the planning balance.

Ground conditions and contamination risks

CS Policy SIE3 states that development of contaminated land will be permitted provided that it can be clearly demonstrated that there are no remaining risks from contaminants or that satisfactory remediation measures will be undertaken to make the site suitable for end-users. This policy position is reflected in NPPF Para. 170(e).

The applicant has submitted a Phase I Geo-Environmental Site Assessment, Preliminary Geo-Environmental Assessment, Phase II Geo Environmental Site Assessment and a Coal Mining Risk Assessment. Chapter I of the ES considers the impact of the development in terms of the ground conditions and contamination risks.

The site has been largely undeveloped from the earliest mapping with the exception of a colliery and two landfills in the south east part of the site and the existing farms. The ES identifies a potential risk to human health from asbestos fibres and TPH compounds at one location within the site. It notes asbestos could be present across the wider site and that this would need to be determined through further site investigation work. No risk to controlled waters was identified. Ground gas monitoring indicates that protection measures would be required for buildings within the southern part of the site. Further detailed site investigation works would be carried out prior to construction commencing and the results of these works used to inform an Options Appraisal and Detailed Remediation and Enabling Works Strategy to set out the mitigation measures required. Working methods to prevent the generation of dust and run-off would be detailed within a Construction Environmental Management Plan, and a Materials Management Plan would also be produced to set out the control procedures for materials brought to and from the site. With mitigation in place the ES concludes that there would be a negligible effect on controlled waters and the wider environment, neighbouring properties and human health.

The Environmental Agency states that they are satisfied with the conclusions of the Phase II Site Assessment but note that part of the site containing an infilled reservoir has not been fully investigated. Therefore they advise that intrusive ground investigation will be required in this area. They acknowledge that the submitted Geo-environmental Site Assessment demonstrates that it would be possible to manage the risk posed to controlled waters but advise that a detailed remediation strategy would be required. They consider that these matters can be dealt with via planning conditions. This approach is supported by the Council's Contaminated Land Officer.

The site is known to be underlain by shallow mine workings with a recorded mine entry in the south east sector. The applicant proposes that a process of drilling and were necessary stabilisation works would be carried prior to construction

commencing. The Coal Authority supports this approach and has no objections to the development subject conditions being imposed to ensure that intrusive site investigation and, where necessary remediation, is carried out.

Subject to the imposition of appropriate conditions, the development is considered to be acceptable in terms of ground stability and contamination risks. These matters are considered neutral in the overall planning balance.

Historic Environment

CS Policy SIE-3 part D welcomes development which preserves or enhances the special architectural, artistic, historic or archaeological significance of heritage assets and states that loss or harm to the significance of a heritage asset, through alteration, destruction or development within its setting, will require clear and convincing justification. The NPPF also requires clear and convincing justification for development resulting in harm to heritage assets, but unlike Policy SIE-3 the NPPF distinguishes between designated and undesignated heritage assets. The need for a desk-based archaeological assessment for developments with the potential to impact on heritage assets with archaeological significance is set out in NPPF Para. 189 and CS Policy SIE3.

A Historic Environment Desk-based Assessment has been submitted in support of the application. There are no designated heritage assets within the application site. The closest designated heritage asset is Castle Hill Farmhouse (Grade II Listed), which is located approximately 100m to the east of the site. Views between the site and this listed building are constrained by topography and heavily filtered by vegetation. The potential for any material adverse impacts on designated heritage assets is therefore considered to be negligible.

The following non-designated heritage assets are found within the site: Mill Hill Farm, the site of the former Bredbury Colliery, part of a former tramway, the part of a former pit mound and the site of a former building on Turner Lane. The significance of any archaeological remains associated with these assets has yet to be determined but may contribute to an understanding of the local development of rural settlements and coal mining since the eighteenth century. The potential for the presence of currently unknown archaeological remains within the remainder of the site is assessed as being moderate to high for the Prehistoric period and low for all other periods. The desk-based assessment considers that the archaeological implications of the development could be addressed by a planning condition requiring that a programme of archaeological work is undertaken prior to development commencing.

The Greater Manchester Archaeological Advisory Service accepts the applicant's conclusion and recommends that an archaeology condition is attached to any planning consent to secure the programme of archaeological fieldwork.

The development would not adversely affect any designated heritage assets within or surrounding the site, with the exception of Castle Hill Farmhouse on which the effects would be negligible. While it would impact on non-designated heritage assets, the impact can be mitigated through conditions requiring that further archaeological investigation and recording is carried out. Subject to these conditions the development is considered to accord with the NPPF and local plan

policies in this respect and the impact on the historic environment is considered neutral in the overall planning balance.

Loss of agricultural land

SUDP Policy GBA2.1 seeks to protect the best and most versatile agricultural land from loss unless it is demonstrated that the agricultural value of the land is outweighed by other factors. This position is echoed by Paragraph 170 of the NPPF which states that planning decisions should recognise the economic and other benefits of the best and most versatile agricultural land. The NPPF goes on to say that where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.

An Agricultural Land Classification Assessment has been submitted in support of the application. The site is currently rough grassland and grazing pasture for horses. The assessment concludes that the majority of the site (30 ha) is of 'moderate quality' capable of producing moderate yields of a narrow range of crops or lower yields of a wider range of crops - Grade 3b. The other 1ha is non-agricultural land. As the 'best and most versatile' agricultural land is defined by the NPPF and SUDP as Grade 1, 2 or 3a land, no conflicts with these policy requirements arise, and therefore this matter is considered neutral in the planning balance.

Residential Amenity

CS Policy SIE1 seeks to ensure adequate levels of privacy and amenity for existing and future residents are provided.

The impact on the amenity of surrounding residents in terms of the visual impact of the development, noise, air quality have been considered in the relevant sections of this report.

An External Lighting Assessment has been submitted to demonstrate the impact that might be had on the site and surroundings as a result of the external lighting. Lighting would be provided to all access roads, parking areas, service yards and building entrances. A buffer zone between the development and residential properties would provide protection from light spillage.

Subject to the mitigation measures discussed within the other sections of this report being implemented and the development being carried out in accordance with the parameters set out within the application the impact on the amenity of surrounding residents is considered to be acceptable. A condition is recommended requiring that a detailed lighting scheme is provided prior to development commencing. Therefore, this matter is considered neutral in the planning balance.

Design Considerations

CS Policies CS8 and SIE-1 require that development is designed and landscaped to a high standard which makes a positive contribution to a sustainable, attractive, safe and accessible built and natural environment. This emphasis on quality design is

echoed by the NPPF at Para.124 which states that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve.

Detailed planning permission is sought for two industrial/warehousing units, associated parking and service areas and a new access from Bredbury Parkway. The units would be located within the western part of the site, adjacent to the access from Bredbury Parkway. There would be car parking at the side of each unit and trailer parking at the front. A new access would be created from Bredbury Parkway with an internal estate road running north to serve the two units.

The layout of the remainder of the development for which outline planning permission is sought would be agreed when an application is made for the approval of the reserved matters. A parameters plan has been submitted as part of the current application and this establishes that a landscape buffer would be included around the perimeter of the site, excluding where the new access road is located. This would strengthen the screening provided by existing vegetation particularly in respect of residential properties to the south east and the Tame Valley to the north. The parameters plan also sets the location of the Sports Village car park, which is located adjacent to the south east boundary of the site. The detailed landscape scheme would be agreed when an application is made for the approval of reserved matters.

The maximum heights of the development are also established through the parameters plan. Buildings within the south eastern part of the site adjacent to Castle Hill Park would not exceed 19.5m in height, and there is a small pocket of land adjacent to Stockport Sports village where the height to ridge would be restricted to a maximum of 16.5m. The entire northern half of the site located beyond Units 1 and 2 would be subject to a maximum height to ridge of 19.5 meters.

In terms of the appearance of the development a varied material palette is proposed to help reduce the perceived scale of the buildings and to add visual interest. Units 1 and 2 would be clad in a mixture of horizontally and vertically laid cladding, in varying shades of grey, with contrasting materials for the ancillary office accommodation and to highlight the entrances, where curtain wall glazing would be used. The roofs would be shallow pitched and finished in grey cladding with roof lights. The gatehouse would be finished in matching materials.

A detailed planting scheme has been submitted for the part of the development for which detailed planning permission is sought and a landscape masterplan has been submitted in respect of the remainder of the site. Trees around the perimeter of the site would be retained and enhanced by additional planting. Landscaping is also proposed within the parking areas and along the edge of the access road from Bredbury Parkway to soften the visual impact.

Whilst objections have been raised to the siting, scale and proximity of the neighbouring site, it is considered that the development has been designed to integrate well into the landscaped areas to the north and west by virtue of the existing and proposed trees/vegetation along these boundaries. The landscape buffer on the south east side of the site will also help to assimilate the development

with the residential area to the south east. The development is clearly in keeping with the character of the wider existing industrial estate to south west, and it is considered that the approach taken to the design and layout will result in a high-quality scheme.

Details of the boundary enclosures have not been provided; therefore conditions are proposed requiring that these details are formally approved.

Overall and subject to recommended conditions, the proposed development is considered to be in full accordance with the design policies in the development plan and NPPF, and therefore this matter is considered neutral in the overall planning balance.

Sustainable Design and Construction

CS Policy CS1 states that the Council will seek to ensure that all development meets an appropriate recognised sustainable design and construction standard where viable to do so particularly in respect of the achievement of carbon management standards. CS Policy SD3 requires all developments to achieve levels of CO₂ reduction based on a benchmark set by the Target CO₂ Emissions Rate (TER) embodied in the 2006 Building Regulations. For this development CS Policy SD3 requires a 30% reduction in CO₂. Policy SD6 requires development to avoid, mitigate or reduce the impacts of climate change through the incorporation of sustainable urban drainage systems (SUDS) and measures to mitigate the urban heat island effect. These policies reflect the aims of Para.153 of the NPPF.

The applicant has submitted an Energy Statement in support of the application which assesses alternative options for the site. District heating is not a viable option for the development due to the likely low heat requirements of the industrial buildings and the fact that the end users of the units are not yet known. The applicant therefore proposes to use Microgeneration Technologies to meet the required targets. The Energy Statement confirms that the development will achieve a minimum CO₂ reduction of 40% beyond the 2006 Target Emissions Rate (or the current Building regulations), whichever is higher. It is envisaged that a high proportion of the targets will be achieved through energy demand minimisation measures such as passive solar design, natural ventilation and high efficiency plant. The remainder of would be met through the use of microgeneration technologies including photovoltaic panels and air source heat pumps.

The applicant has also submitted a New Development Certification Note from The Planet Mark sustainability consultants. This sets out the environmental measures that the developer is committed to incorporating in order to create a development with the highest sustainability credentials.

The Council's Energy and Sustainability Officer recognises that the energy statement is fully compliant with CS Policy SD3 but notes that there is no clear assessment of the TER. It is therefore considered necessary to impose a condition requiring that details of the percentage carbon savings and a methodology for meeting the target are submitted for written approval.

The requirement for SUDs is addressed within the flood risk and drainage section of this report.

Subject to the recommended conditions, the proposals are considered to accord with the sustainable design policies set out within the development plan and NPPF. Given that these fundamental requirements apply to all development, compliance is considered neutral in the overall planning balance.

Crime Prevention

CS Policy SIE1 together with Paras. 117 and 127 of the NPPF seek to ensure that developments create safe living conditions and incorporate safety and security measures into the design whilst not compromising overall design quality.

A Crime Impact Statement has been submitted with the application. The statement advises that the residential areas to the south of the site have relatively high levels of violent crime, but this is not attributable to the existing industrial estate. Crime levels within the industrial estate are described as worrying but not unexpected. The introduction of new industrial units and the recommended security strategy is expected to prevent or reduce opportunities for crime to be committed within the development and may improve other nearby areas. The recommended crime prevention measures include security fencing, CCTV at the site entrance, enclosed refuse storage facilities, designing buildings to minimise opportunities for climbing, ensuring that natural surveillance is maintained and providing security lighting.

Greater Manchester Police have reviewed the Crime Impact Statement and recommend that a condition is imposed requiring that the development reflects the physical security specifications set out within the statement.

Subject to the imposition of the recommended condition and detailed assessments of the outline components at the reserved matters stage, the proposal is considered to accord with policy SIE1 of the Core Strategy and Para's 117 and 127 of the NPPF. Therefore this matter is considered neutral in the planning balance.

Minerals

The site is located within a mineral safeguarding area for shallow coal, brick clay, sand and gravel as defined by the Greater Manchester Joint Minerals Plan (GMJMP). Policy 8 of the GMJMP states that proposals for non-mineral development within safeguarded areas that do not allow for the prior extraction of minerals will be permitted in four circumstances. These include where it can be demonstrated that it is not environmentally acceptable or economically viable to extract the minerals or if it can be established that the mineral is not present or that there is no economic value in extracting it.

A Minerals Assessment has been submitted with the application. This advises that there is a small superficial deposit of glaciofluvial sand and gravel, but this is too small to be worth extracting and therefore has no economic value. The site is also underlain by coal which has been worked since the mid-late 19th century. It is therefore reasonable to assume that little, if any, of the coal remains in situ and it

would not be economically viable to extract it. It would also be environmentally unviable due to the proximity to residential and commercial properties.

For the reasons set out above it is considered that the proposal complies with Policy 8 of the GMJMP, and this matter is considered neutral in the overall planning balance.

Impact on PROW

CS policy CS8 seeks to create appropriate access for a range of users to enjoy the countryside, including improved linkages to formal and informal recreation. SUDP policies L1.7 and L1.9 seek to protect and enhance the public rights of way and other recreation routes. Guidance contained within Para's 91 to 98 of the NPPF highlights the planning system's important role in creating healthy, inclusive communities which enable and support healthy lifestyles and promote social interaction. Para. 96 states that access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities and Para. 98 requires planning decision to protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users.

There are a number of existing rights of way which run through and adjacent to the site including Turner Lane. To construct the development it would be necessary to divert these footpaths. It is proposed to divert Turner Lane further north towards the River Tame and to upgrade it from an unsurfaced track to a public bridleway with its new route running through a landscaped area.

As layout is not being considered at this stage details of the footpath diversions required for the part of the development for which outline permission is sought would be finalised when an application is made for the approval of the reserved matters.

The development would provide improvements to Turner Lane, which would benefit existing users of the route and workers within the proposed development. Connectivity through the site would be maintained and the diverted PROW would provide access into the development from the adjacent housing areas. There would however be some harm to views from the footpaths, and this is discussed in the Landscape/visual impact section above.

Overall, the impact on PROW is considered to comply with the NPPF and local policies, and is considered neutral in the overall planning balance.

Traffic, transport and accessibility

The scheme before members follows extensive discussions between the applicant, Highways England, TfGM and the council and not only seeks to mitigate for any impact of the development the scheme of works also seeks to assist the wider area increasing accessibility and supporting sustainable modes of travel.

Policies CS9, CS10, T1, T2 and T3 of the Core Strategy seek to ensure that development is delivered in accessible locations and is of a design and layout that is safe to use, considers the needs of the most vulnerable road users following a

hierarchical approach, provides sufficient parking and does not have an adverse impact on highway safety or the capacity of the highway network.

These policies reflect the stance set out in Para's 108 and 110 of the NPPF, while Para.109 advises that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Policy TD2.2 of the SUDP relates to development affecting designated "Quiet Lanes". It states that developments that detracts from the character of rural roads, and their value as "Quiet Lanes", will only be permitted where they can be justified on safety grounds. Development will not be permitted if it results in a significant increase in traffic or conflict between users of the lanes.

The impact of the development on the highway network is assessed in Chapter D of the ES, the accompanying Transport Assessment and Framework Travel Plan and a series of Technical Notes. The ES establishes the current and future baseline conditions, then considers the likely effects of the development during the construction and operation phases, identifies areas of concern and finally sets out mitigation measures and the likely residual effects.

Baseline traffic flows have been obtained for roads and junctions within the vicinity of the site, including the northern and southern junction of Bredbury Park Way and Ashton Road, the northern and southern dumbbell roundabouts at the M60 junction, the junction of Ashton Road and Lingard Lane and the junction of Stockport Road West and Ashton Road. The majority of the junctions are shown to be busiest during the morning peak hours (08:00-09:00) and observations revealed that the network experiences notable congestion during the peak periods. The average vehicle delay during the most congested period was found to be approximately 7 minutes and 51 seconds, with an average delay of approximately 3 minutes and 54 seconds during the least congested period.

Trip generation forecasts have been produced using a combination of TRICS data and traffic surveys. The trip rates are based on a worse case scenario given that the end users and the proportions of B8 and B2 use are not known. The assessment estimates that the development would be expected to generate 340 two-way vehicle movements between 0730 and 0830 (270 light vehicles and 70 HGVs) and 318 two-way vehicle movements between 0830 and 0930 (208 light vehicles and 110 HGVs). In respect to the afternoon peak, the assessment outlines that the development would be expected to generate 310 two-way vehicle movements between 1630 and 1730 (253 light vehicles and 57 HGVs) and 181 two-way vehicle movements between 1730 and 1830 (136 light vehicles and 45 HGVs).

The accessibility of the site by sustainable travel modes is also reviewed. It is linked to surrounding residential areas of Bredbury, Haughton Green, Brinnington and Woodley by existing pedestrian infrastructure, which includes a shared footway/cycleway along parts of Ashton Road and Bredbury Park Way. There are two pedestrian routes into Brinnington, namely the footway alongside Lingard Lane and a footbridge over the M60. The ES describes how there are also good levels of cycle infrastructure in the vicinity of the site and a bus stop within 400m.

The ES does not include a forecast of construction traffic but considers that traffic movements are likely to be low level and spread over the working day, and notes that deliveries can be controlled to avoid peak hours. Delays could occur as a result of temporary lane closures and road works with the main impacts likely to be on drivers on junction 25 of the M60, Ashton Road and Bredbury Park Way. The effects would be short terms and temporary.

The operational impacts are assessed in terms of driver delay, pedestrian amenity, severance and highway safety using traffic forecasts based on the detailed assessment contained within the Transport Assessment. The greatest increase in traffic flow is predicted to be along the northern section of Bredbury Park Way. Without mitigation the development is described as having a '*moderate adverse*' effect on drivers on the M60 J25 off-slip, drivers on Ashton Road, drivers on Bredbury Parkway and pedestrians and cyclists on Bredbury Park Way. With the mitigation proposed all effects are reduced to '*Negligible*' or '*Minor Adverse*'.

Impact on the highway network:

The impact of the development on traffic growth and the highway network has been assessed for 2023 and 2028 using a VISSIM microsimulation model (VISSIM). A range of scenarios are considered including an assessment of network performance if the development did not go ahead ('Do Nothing' scenario), an assessment if the development went ahead without any mitigation and an assessment of the impact of the development with mitigation ('Do Something' scenario). Without mitigation the development is shown to have a significant impact on network performance and mitigation is therefore proposed to address these impacts. The VISSIM model identified the most significant constraints on the network and that intervention at the following junctions would prove most effective in mitigating the impact of the development:

- Ashton Road/Bredbury Park Way (northern junction)
- Ashton Road/Predbury park Way (southern junction)
- M60 junction 25 northern dumbbell roundabout
- M60 junction 25 southern dumbbell roundabout

The following mitigation measures are proposed:

Ashton Road/Bredbury Park Way (northern junction):

- Widen and re-align the junction and introduce signal control to increase the capacity of the junction.
- Introduce advisory cycle lanes on the Ashton Road and a segregated cycle/foot path along both sides of Bredbury Park Way to link the junction to the site access,.

Ashton Road/Bredbury Parkway (southern junction):

- Extend the 2-lane approach on Bredbury Park Way to give increased capacity.
- Provide a shared footway/cycleway along the southern side of Bredbury Park Way leading onto Ashton Road.

M60 Junction 25 northern dumbbell roundabout:

- Create additional lane capacity using flares on the approaches and the introduction of signal control on the roundabout.
- Widen the south bound exit on Ashton Road to provide a longer extent of 2-lane operation in the southbound direction
- Improvements to pedestrian and cycle facilities, including a controlled crossing on the Ashton Road northern arm, and new pedestrian links.
- Addition of an extra lane to the Crookilley Way approach.

M60 Junction 25 southern dumbbell roundabout:

- Part signalisation of the roundabout to provide signal control on the Crookilley Way northbound approach and the M60 northbound off-slip.

The modelling assesses the impact on the overall network in terms of average vehicle speeds, and vehicle delay. The journey time results for the morning peak period do not show any significant increases in journey time in the 'Do Something' scenarios, when compared to the Reference Case scenarios, and in some cases show a decrease. The evening peak period shows some significant reductions in journey times.

The reduced scheme now being proposed would generate notably fewer trips than the previously proposed scheme. Across the two-hour morning peak period, this would amount to 112 fewer light vehicle trips and 42 fewer heavy vehicle trips. Across the two-hour evening peak period, it amounts to 92 fewer light vehicle trips and 26 fewer heavy vehicle trips.

The VISSIM model also considers the performance of eight individual junctions within the network by looking at the queue length on the approach to each junction. The results broadly show improvements in terms of reductions in queue lengths particularly during the evening peak period.

The VISSIM model suggests that the proposed highway improvement works are sufficient to mitigate the effects of the development in both the morning and evening peak periods. It is also noted that while the revised proposals seek a reduction in the proposed quantum of floorspace by 20% the mitigation package has not been reduced. The proposed highways improvements were designed to create capacity in local highways infrastructure sufficient to resolve existing issues and to allow a development of 116,129 sqm.

Parking and access:

For units 1 and 2, which are subject to the detailed application, parking is proposed in accordance with Stockport's Parking Standards in terms of the overall number of parking spaces, the number of accessible bays and electric vehicle charging points. Cycle parking is also proposed in accordance with the Council's standards. The parking provision for the remainder of the site would be finalised when an application is made for the approval of the reserved matters.

A new car park is proposed within the site to serve Stockport Sports Village and relieve parking pressure on the residential streets surrounding the Sports Village in Woodley. It would be located at the south east edge of the site and contains 32no. spaces.

A single vehicular access with a pedestrian refuge is proposed from Bredbury Park Way. This is designed to accommodate a 16.5m articulated lorry and would provide two lanes on exit from the site. A pedestrian footway would be provided on the southern side of the access and a cycleway/footway would be provided along the northern side.

Low railway bridge:

Around 60m to the north of junction 25 of the M60 Ashton Road passes under a railway bridge with a height restriction of 4.4m. Objectors have voiced concerns that this height restriction leads to HGV's being unable to access the industrial estate from the south via Ashton Road, and instead they access it from the north via Tameside.

The Transport Assessment includes data from a survey of HGV movements to and from the existing industrial estate that was carried out on a typical weekday (Tuesday 15th November 2016) during the morning and evening peak periods. Video surveys were carried out at the two Bredbury Park Way junctions with Ashton Road to establish the number and type of HGVs travelling to and from Junction 25 and passing under Ashton Road railway bridge, and also the number and type of HGVs that use Ashton Road to the north, to and from Denton. From the surveys it was possible to determine whether any vehicles that were travelling to and from Denton were too high to pass underneath the Ashton Road railway bridge. Following review of the video survey footage, there was no evidence of HGVs travelling to/from the north that wouldn't have been able to travel under the railway bridge. The surveys indicate that vehicles heading to/from the Tameside area are choosing this route for reasons other than the height restriction at the railway bridge.

The evidence contained within the Transport Assessment demonstrates that there is not an existing issue with excessive oversized HGV's unable to access the existing industrial estate via Ashton Road. There is no evidence to suggest that the application proposals would have any bearing on the existing conditions, which would remain the same. It would therefore be unreasonable and unnecessary to require this development to address this perceived matter.

Accidents:

A review of accident data has been carried out using data obtained from TfGM and the crashmap online database. The accident data does not indicate any defects in the existing highway network that cause a significant highway safety concern.

Turner Lane:

Turner Lane is designated as a Quiet Lane within the SUDP. Quiet lanes are defined as being a highway where cars are encouraged to travel at lower speeds, and it is easier for cyclists, walkers, horse riders and those in wheelchairs to travel. Policy TD2.2 seeks to protect the character of such roads from development which increases conflict between users.

The proposal requires Turner Lane to be re-routed but this would not result in any change to how it would be used and its character would be retained by routing it through an area of woodland planting. It would be upgraded to a public bridleway in

order to improve accessibility for all users. The proposal is therefore considered to comply with Policy TD2.2

Sustainability Improvements:

In addition to the highway improvement listed above the following improvements are proposed to improve the accessibility of the site:

- New southbound bus stop and improved northbound bus stop on Ashton Road.
- Installation of lighting on the footbridge over the M60 to Brinnington, and improved access to the bridge from Cromwell Road.
- New/upgraded footway/cycleway connection to link Arden Road and the National Cycle Route.
- New/upgraded cycleway connection to Mill Lane.
- New controlled crossing facilities to improve the link between the north and south of the M60 J25 roundabout.
- New pedestrian refuge on Ashton Road linking to the PROW on either side.
- New Toucan crossing facilities across all arms at the Ashton Road junction and on-carriageway cycle lanes through the junction.
- New footway / cycleway to link western side of Ashton Road with Cromwell Road.
- New upgraded footway / cycleway connection to link site to northern end of Mill Lane, and resurfacing and lighting along a section of Turner Lane.

The ES and other submissions have been assessed in detail by the Council's Highway Engineer, TfGM and Highways England.

The Council's Highway Engineer concludes that subject to conditions and the applicant entering into a Section 106 Agreement, the development will accord with local and national transport policies, including those in the NPPF and the Stockport Core Strategy DPD, as well as local and national design advice and guidance.

Highways England have determined that highway mitigation will be necessary in order to ensure that the impact of the proposed development on the surrounding road network is minimised. They recommend conditions to secure these works.

Transport for Greater Manchester have raised some concern in respect to aspects of the VISSIM modelling, noting that the base model does not reflect existing levels of congestion that can be observed.. They acknowledge, however, that the model has been validated and therefore they note that observed queues may be down to day-to-day flow variability and, as such, the predicted queues and delays may be greater than that predicted on certain days. As the VISSIM modelling is based on the floor area of the development that was originally proposed, as opposed to a floor area of 20% less, the predicted impact the impact of the development should be less than that predicted and the number of days where queues and delays may be greater than that predicted are likely to be less. In addition, the junction improvements also include pedestrian and cycle infrastructure which will improve the accessibility of the site and wider area, which, together with travel plan measures may help to further mitigate the impact of the development.

It is recognised that considerable public objections have been made to the development on grounds of additional traffic and the impact on the highway network. However, the test for the LPA is to consider whether the impact of the proposed development is adequately mitigated for and that the highway impact is less than severe. Considerable dialogue, evidence and information has been submitted which has resulted in discussions involving the Council, TFGM and Highway England over many months, which have culminated in a scheme which is supported by a comprehensive package of works, with a total value in the region of £7m. It is considered that subject to the imposition of the recommended conditions and a legal agreement to secure the mitigation measures set out above, the development would not result in significant harm to the highway network. The proposal is considered to comply with the development plan NPPF in terms of traffic, transport and accessibility.

The mitigation measures proposed would not only mitigate the impact of the development on the highway network but would enhance pedestrian/cycle links in the surrounding area. As these routes provide access to the existing industrial estate and surrounding residential areas any improvement will be of benefit to a wide range of users.

It is considered that these benefits should be afforded moderate weight in the overall planning balance.

Flood Risk and Drainage

UDP Policy EP1.7 states that the Council will not permit development where it would be at risk of flooding; increase the risk of flooding elsewhere; hinder future access to watercourses for maintenance purposes; cause loss of a natural floodplain; result in extensive culverting; affect the integrity of existing flood defences; or significantly increase surface water run off unless sustainable mitigation are in place to overcome adverse effects. It goes on to state that development should incorporate so far as is practicable, sustainable drainage systems taking account of current Government guidance. Core Strategy Policies SD6 and SIE3 states that development should comply with national planning policies managing flood risk and where planning permission is required, areas of hard-standing or other surfaces, should be of a permeable construction or drain to an alternative form of SUDS. SD6 also makes clear that brownfield sites are required to reduce unattenuated run-off by a minimum of 50% and on greenfield sites, such as the housing land, rates should not exceed existing greenfield rates.

Para's 163 and 165 of the NPPF state that developments should ensure that flood risk is not increased elsewhere and that sustainable drainage systems should be incorporated into major developments.

Planning Practice Guidance sets out a hierarchy of drainage solutions. Generally, the aim should be to discharge surface runoff as high up in the hierarchy as possible. In order of priority the drainage options are: into ground (infiltration), to a surface water body, to a surface water sewer and finally to a combined sewer.

Chapter G of the ES assesses the potential impact of the development in terms of flood risk and drainage. Baseline conditions have been established following a topographical survey of the site and a review of geological and drainage information. The generally topography is undulating with ground levels across the site varying by approximately 27m. The nearest water course is the River Tame, which is located approximately 20m from the north east boundary. The site is crossed by several existing surface and foul water sewers. The entire site is located within Flood Zone 1, with a low risk of surface water flooding. Flooding risks from other sources (tidal, sewer, groundwater and artificial sources) are considered to be low. Due to the 15m elevation above the River Tame climate change and the resulting increase in flood risk are highly unlikely to impact on the site.

The development would result in a significant increase in hardstanding and surface water runoff rates, which could result in a substantial increase in flood risk. It would also result in an increase in foul water discharge and could impact on water quality through fuel/chemical spillage.

The ES sets out a series of mitigation measures to reduce the impact of the development including:

- Good working methods to prevent chemical/fuel spillages entering the river.
- Regular road cleaning and wheel washing to prevent silt laden run-off entering the river or escaping into ground.
- Locating stockpiles away from the water course and drainage systems.
- Controlling surface water discharge rates and volumes to ensure there would be no increase in surface water discharge.

In conclusion and with mitigation the residual effects are assessed as '*minor*' or '*negligible*'.

In order to ensure that the proposed development does not increase flood risk elsewhere it is proposed to control surface water discharge rates and volumes, and to use sustainable drainage systems to accommodate the 1 in 100 year flood event plus 40% climate change storm event.

Detailed planning permission is sought for Units 1 and 2 and as such, the layout for these units is fixed. Outline planning permission is sought for the remainder of the site, with layouts of the units subject to change. Surface water runoff would be discharged to the River Tame via an existing outfall on the public surface water sewer which crosses the site at a limited discharge rate. The surface water sewer would be replaced with new surface water culvert. Attenuation storage would be provided across the site with each unit having their own privately owned drainage system encompassing attenuation storage and flow control. It is proposed that the principle Sustainable Drainage Systems system for the development will be made up of ponds, swales or detention basins to attenuate, convey and treat surface water run-off prior to discharge from site. These are likely to be located in the north-eastern extent of the site adjacent to the River Tame.

The applicant has advised that Unit 1 would have an estimated storage volume requirement of 3,420m³ and Unit 2 a requirement of 1,542m³. No drainage ponds are proposed within the northern landscape buffer zone.

Given that the remainder of the development is outline, detailed drainage proposals have not yet been established. Therefore, conditions are recommended requiring detailed surface water drainage proposals incorporating SUDS to be submitted at a later date, formally approved and implemented in full.

It is considered that the imposition of planning conditions will secure sustainable and policy compliant drainage solutions. This conclusion is supported by the LLFA, the Environment Agency and United Utilities.

Subject to recommended conditions, it is considered that in the absence of any significant harm in flood risk and drainage terms these matters are assessed as neutral in the overall planning balance.

Planning obligations

In order to make the development acceptable in planning policy terms, it is recommended that planning permission only be granted for the proposed development if the Council enter into a legal agreement with the applicant to secure the following heads of terms:

- £96,000 to be paid towards habitat improvement at Woodhall Fields and Reddish Vale Country Park.
- Highway contributions:
 1. The requirement to provide a queue loop detector at the Ashton Road / Bredbury Parkway South junction in the event that future monitoring shows that traffic queues extend back to the Ashton Road roundabout
 2. The payment of a financial contribution to fund street lighting / signage on Arden Road / Turner Lane
 3. The reservation of a route in the landscaped area to the south-east side of Unit 7 to allow the Council to provide a cycle route through this area (and then south) in the future.
 4. The payment of a financial contribution to cover the Council's costs of monitoring the Travel Plan/s for the site.

These heads of terms are considered to satisfy the legal tests that require planning obligations to be:

- necessary to make the development acceptable in planning terms
- directly related to the development
- fairly and reasonably related in scale and kind to the development

Other Matters

Responses to other matters raised in the written representations not dealt with above are provided below:

- A development's impact on house prices is not a material planning consideration.
- Every planning application is judged on its own merits and this application would not therefore set a precedent for other development to be approved within the Green Belt.

- Although footpaths within the site would need to be re-routed, once complete residents would still be able to use these routes for exercise and recreation.
- The site is privately owned and, other than via the footpaths is not publicly accessible. Therefore, it is not considered that the development would adversely affect residents' access to green space for exercise or recreation.
- Refusing the application on the grounds of prematurity would be unreasonable given GMSF that on the 3rd of December 2020 Stockport Council decided not to endorse the latest draft GMSF document. Therefore, in the context of the consideration of this application the publication draft GMSF carries no weight.

The letters of support which have been received primarily refer to the difficulty local business have in finding premises, the shortage of high-quality warehousing space in Stockport and the benefits the development would bring to the economy which is discussed above.

Planning balance and overall conclusion

The proposed development is located in the Greater Manchester Green Belt and is in conflict with relevant Green Belt policies in the statutory development plan. Planning permission should therefore be refused unless material considerations exist that warrant a decision other than in accordance with the development plan. Importantly, the SUDP policies relating to Green belt development make no allowance for exceptions to be made to green belt protections where 'very special circumstances' exist. However, the NPPF is a material consideration that makes clear that exceptions can be made to the strong presumption against inappropriate development in the Green Belt in 'very special circumstances'. Given the age of the development plan policies that the proposals are in conflict with, it is considered that the NPPF should be afforded overriding weight in this regard. The determination of this application is therefore based on an assessment of whether 'very special circumstances' exist as explained and defined in the NPPF.

Earlier sections of the report identify that the need for large scale industrial/distribution buildings to deliver economic and social benefits is an essential objective with clear public benefits and that alternative, less harmful ways of meeting that objective have been fairly and reasonably discounted.

NPPF Para.144 however also provides that "‘very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations." This part of the assessment requires decision makers to weigh cumulative harm against the cumulative benefits of the proposals. If the benefits clearly outweigh the harm caused, then planning permission should be granted.

The development is inappropriate development in the Green Belt and is therefore harmful by definition. It will also have a detrimental impact on the openness of the Green Belt, resulting in a complete change in the site's landscape character and an elimination of its openness. Finally, the proposed development will result in urban sprawl and encroachment into the countryside, the prevention of which are two of the purposes of Green Belt designation. In accordance with the NPPF, **substantial**

weight should be attributed to the harm to the Green Belt caused by the proposed development.

The loss of openness described above would also have a detrimental landscape and visual impact on the character of the area, resulting in harm to the Tame Valley Landscape Character Area. Given that the adverse impact would be reduced by the proposed landscape mitigation scheme, it is considered that the **landscape and visual harm should be afforded moderate weight in the overall planning balance.**

The development would also result in harm through the loss of habitat of protected species, but when taking into account the mitigation measures and habitat enhancements that are proposed it is considered that ecological impacts are neutral in the planning balance.

In contrast, the economic and social benefits of the developments to both the immediate area and the wider south west Manchester region are clear. The development would help meet an identified need for large scale industrial units in Stockport as evidenced by the strong and immediate demand for such units and the lack of current availability both within the existing industrial estate and the wider Stockport borough. It has been demonstrated through the application that there are no alternative sites capable of accommodating either a large-scale logistics development or individual units of the size proposed under this application.

The NPPF is clear that '*significant weight*' should be placed on the need to support economic growth and productivity, and that planning decisions should help create the conditions in which businesses can invest, expand and adapt (Para.80). The NPPF also sets out the importance of recognising and addressing the specific locational requirements of different sectors. It is therefore considered that the **need for large scale industrial and warehousing units should be afforded substantial weight in the overall planning balance.**

There would be local and regional economic benefits through the creation of jobs, with particular benefits to the adjacent area of Brinnington which experiences high levels of unemployment and deprivation. Jobs would be targeted towards local people through an Employment and Skills Scheme and the development could make an important contribution towards addressing localised deprivations issues. It is considered that the **socio-economic benefits should be afforded moderate to substantial weight.**

Other benefits delivered by the development include the creation of an overspill car park for the Stockport Sports Village, a new public bridleway/footpath to the north of the site, running close to the bank of the River Tame and off-site improvement works to enhance pedestrian and cycle links between the site and Brinnington and Woodley, allowing easy access for local workers. These **social benefits are considered to carry some, but limited weight in the overall planning balance.**

Without mitigation the development would result in harm to the highway network. A package of mitigation measures are however proposed which would fully mitigate the impact of the development and secure improvements to access routes serving the

surrounding area. It is considered that these **accessibility improvements should be afforded *moderate weight* in the overall planning balance.**

In terms of the planning balance, it is considered that the contribution that the development would make to the Council's employment land position is significant and of particular importance, particularly given that the evidenced need for such development that only Green Belt sites are likely to satisfy it. It is considered that this and the other significant economic benefits would clearly outweigh the considerable harm caused to the Green Belt and the other harm identified in the report above.

Having assessed and balanced the cumulative harm against the cumulative benefits of the proposed development above, it is considered that the benefits of the proposed development clearly outweigh the substantial harm to the Green Belt, justifying the proposal on the basis of very special circumstances. It follows that the benefits of the proposed development would clearly outweigh the harm to the Green Belt and all other harm in accordance with NPPF Paragraph 144.

RECOMMENDATION

Grant subject to conditions; the completion of a Section 106 legal agreement securing the heads of terms detailed above; and the application having first been referred to the Secretary of State to give him the opportunity to call in the application for his own determination should he wish to do so.