

## **BREDBURY PARKWAY INQUIRY CLOSING SPEECH**

Thank you Sir.

I would like to begin by sincerely thanking you for allowing me to take part in this process. I would like to express my thanks for yours and Yvonne's patience and accommodation.

I went into this Inquiry having had precious little experience of the process. It has certainly been a steep learning curve, and I am very grateful to everyone who has supported me during it; including Claire and Griffin in my office, as well as Nick Fenwick – both for his counsel and for agreeing to support my statement. I would also just like to thank all interested parties who have taken part in the Inquiry including – but not limited to – CPRE, Diane Coffey, Steve Marsland, the children of Russell Scott Primary School and Cllr's Jack Naylor and George Newton.

I believe that the evidence heard at this inquiry has proven that this development should be rejected in its entirety. It has demonstrated that traffic, as well as the low Ashton Bridge will be an issue to some extent; that the damage to the Valley will be severe and irreparable and that green belt policy, both in the UDP and NPPF render this application wholly inappropriate.

It is my belief that the facts of this case are clear. There are simply no Very Special Circumstances that exist to outweigh the NPPF, Greenbelt and River Valley Policies. In closing, there are some key points, which have been raised both in

evidence and over the course of the inquiry, which I believe are instructive to re-emphasise.

## **Need**

As Mr Barrett has highlighted in his excellent cross-examination, need has not been objectively demonstrated, and therefore any reliance on Very Special Circumstances falls away.

Much play has been made by the appellants of the pressing need for industrial employment space. Time and time again they have sidestepped the simple fact that there are no end-users for the proposed development, and therefore any reference to pressing need stretches credulity.

I am grateful for the evidence that Mr Wood gave on behalf of Stockport Metropolitan Borough Council. As Mr Wood made clear, sufficient work has not been conducted to establish what the need/demand is, and how this should be met. It is essential that this work is done through the local plan process.

It is not for a developer to impose what it views as necessary development. It is something that should be decided through a process that has rigor and is evidence based where alternatives can robustly be examined and considered.

It also should be part of our democratic local processes. The democratic process in Stockport has rejected this appeal because it is not suitable. It is now the job of the Council to

suggest a suitable alternative. That process is underway, and we should not attempt to bypass or supersede it.

I would also reinforce the arguments made by Harry Bolton of CBRE, namely that it is only “through an evidence-led plan-making process that a full, objective, and robust picture of employment need can be determined and used to inform the spatial distribution of all development across Stockport.” The appellant seeks to pre-empt that full, objective, and robust picture, all to the detriment of the Tame Valley.

I have made regular reference in my evidence and statements to Ashton Moss. It has been included in every single iteration of the GMSF and is now part of Places for Everyone.

In addition to this, on the Friday just gone, it was announced that Ashton Moss will form part of a new Mayoral development zone around Ashton-under-Lyne.

Full details of this can be found in Inquiry Document ID-018, however just to summarise, Ashton Moss forms a key part of the ‘innovation corridor’ which will include St Petersfield and Ashton town centre. This zone has been backed by the Mayor of Greater Manchester, who will sit on the steering board alongside senior representatives of the GMCA, Homes England and Transport for Greater Manchester. It’s clear, then, that redeveloping Ashton Moss is not only a Tameside Priority, but a regional one too.

I do not believe that the site would have been included in GMSF, PfE and this new Mayoral Development Zone, were

there not a realistic prospect of development within its boundaries. Despite the appellant's best efforts, Ashton Moss serves to prove that there are possible alternatives to development in the Tame Valley, and that these should be fully explored prior to releasing Green Belt land which is so important to the people I represent.

Finally, on employment, I have raised my concerns on the nature of automation within the logistics industry, as well as what I view to be inconsistent employment estimates.

### **Traffic, Highways and Congestion**

As traffic is not an area that Stockport Metropolitan Borough Council are contesting, I believe that over the course of the inquiry it has been my responsibility to speak on behalf of residents who have real concerns over the low Ashton Road bridge, and the possibility of it compounding congestion problems in the area.

As I have demonstrated in core documents 8.26 and 8.27, as well as in Inquiry Document 008, the Ashton Road bridge has long been a cause for concern amongst council officers and local people. The evidence is there in black and white and cannot be disputed.

Stockport Metropolitan Borough Council officers have clearly stated on two occasions that 18-20% of HGVs are unable to clear the bridge, and I do not believe that the appellant has a) taken this seriously or b) provided any clear mitigation measures in the event that Stockport's estimates are proved to be correct.

In fact, the dismissive nature by which the concerns of residents in Denton have been treated is a source of continued and immense personal frustration.

Councillors, residents, and local leaders have repeatedly raised this issue with the developer, and time and time again been told that the problem is either entirely manufactured or overstated. We now know that not to be the case. Around 1/5<sup>th</sup> of HGVs avoid the Ashton Road Bridge, and in examination Mr Hargreaves – acting on behalf of the appellant – admitted that vehicles will just take the Denton route to avoid the bridge.

The fact is, there is already an end-user on the Bredbury Industrial Estate whose entire fleet of vehicles cannot get under the low Ashton Bridge. This is demonstrated in correspondence that was sent on to me on behalf of Viridor Waste, then a contractor of Greater Manchester Waste Disposal Authority. This undermines Mr Hargreaves' assertion that high-sided HGVs would most likely be sparingly utilised. In fact, as I pointed out in my cross-examination, the appellant cannot guarantee that end-users will not seek to increase logistic transportation, and thereby utilise high-sided vehicles.

The appellant has pointed to the Bredbury Industrial Corridor Improvement Package as evidence that the bridge will be dealt with in due course. As demonstrated in my cross-examination of Mr Hargreaves, BECI is by no means a done deal. In fact, a bid hasn't even gone in, and we have no idea how long TfN funding will take to be granted – if it is

granted at all. In the meantime, residents in Denton will be left to bear the brunt of a short-sighted development, and HGVs will continue to plight residential roads in the area.

Furthermore - and as Mr Marsland from Russell Scott Primary School so eloquently put it - roads to Ashton Road, Bredbury and Crookilley Way, Stockport are already far in excess of safe air quality levels. As I made clear in my evidence in Chief, the same can be said for the Crown Point area, the A57 Manchester Road and the Denton roundabout. This can clearly be seen in the Greater Manchester Clean Air Zone Map, which can be accessed online and within my Statement of Case. I note that the appellant has not provided any answer to this fact, and has instead opted to ignore the dire reality of the air quality situation in the area.

24-hour logistics, alongside increased HGV activity, will further exacerbate this problem. Yet again the people of Denton will pay the price.

I believe the strength of feeling on this issue was powerfully put to the Inquiry by the students at Russell Scott. We owe it to them to help build a greener and cleaner future, not make regressive decisions that further exacerbate pollution in the area.

### **Damage to the Green Belt & coalescence**

This proposal will irreparably damage the green belt, as well as further encroach on the Tame Valley and its diverse wildlife.

This is not something that has been disputed by the appellant. I noted that on multiple occasions, Mr Holliday repeatedly told the inquiry that harm would be done to the green belt. However, despite that admission, the appellant has made some strange arguments in attempting to blunt the reality of the damage that will be done to the Valley.

The first is the assumption by Mr Holliday that the proposed site is an “isolated” patch of land, which pales in comparison to the beauty of the incised and wooded part of the Valley. This is something that Mr Pemberton accorded with in his own evidence in chief. This is entirely incorrect, and unfortunately reveals an ignorance of the Valley that is hard to countenance.

The Tame Valley should not be chopped up and examined patch by patch. It is an entire landscape area that should be considered as a whole. You cannot lob off a portion that you want to use, and then claim that it wasn't really part of the Valley in the first place. It is cynical, and it is not accurate.

As I made clear in my cross-examination of Mr Holliday, the boundaries of the Tame Valley were drawn long before the current Bredbury Industrial site. They have been in place for over 40 years. This is something I have reinforced in Inquiry document 13.

They were not arbitrarily drawn, they were drawn to incorporate the space where the Tame Valley opens into much wider, open valley, and towards the floodplains around Reddish Vale. This area is part of the varied

landscape of the valley, and therefore enormously valuable to the integrity of the area.

A second aspect related to the Green Belt which has been the subject of much discussion is the issue of coalescence and urban encroachment. As Mr Fenwick made clear in his evidence and in subsequent cross-examination, this development would effectively destroy any functional separation, physically and spatially. It would impose “heavily into the existing Green Belt and narrow down the natural flow and openness of the green belt at this point”.

Whilst there has been some disagreement over the so-called landscape buffer, it has now been recognised by the appellant that the buffer will provide just 222m between the red boundary line of the site and the nearest Tameside properties. This is recognised in ID-010. This 222m distance was not included anywhere in the appellants original assessment. In fact, I would point out that it was only included after I asked on two separate occasions for it to be incorporated.

Any landscape screening will take years to mature, and even then, the imposing buildings will still be visible from several areas in and around the site. Indeed, by Mr Pemberton’s own admission in his Proof of Evidence, it will take 15 years for landscaping to reach early maturity, and even after 15 years there will still be an impact on openness in the Valley.

This is simply not acceptable.



As I pointed out in my cross-examination of Mr Holliday, for a resident in Haughton Green, living in one of the tower blocks, the proposal will lead visual coalescence and destroy any sense of openness.

Furthermore - as has been recognised by a number of witnesses - logistics is a 24-hour operation. As a result of this, there will be activity, artificial light from vehicles and lighting on site which will tangibly increase the perception of urbanisation in the area.

I have also raised objections on multiple occasions over the course of the inquiry to the topographical work that will be required at the site. Extensive earthworks will create plateaus for the benefit of large-scale construction, this will effectively take a sledgehammer to the unique topography of the Tame Valley.

The topography of the Tame Valley is part of what makes it so special, to artificially nibble away at it totally threatens to destroy its defining characteristics and attributes.

Another claim regularly stated by the appellant and witnesses is that mitigation measures will result in net biodiversity gain. This may be the case for the area beyond the Valley, but the fact is that in the site itself, biodiversity will be reduced by 40%. This is a substantial figure, and I do not believe that it is fair that this area of the Valley should lose so much biodiversity because of this development.

Finally, I would reiterate the concerns of Cheshire Wildlife Trust, as well as CPRE – The Countryside Charity on the appellants ecological considerations. In my evidence, I have

pointed to failures within the appellants ecological assessment.

There has also been no full-bird survey undertaken, something that I find hard to believe given the sites proximity to Local Nature Reserves and a designated site of Biological Importance.

Given these failures, I am unfortunately not reassured by the appellant's assertion that the LNRs will not fall victim to light and noise pollution.

### **Policy and Planning**

As those observing this inquiry will note, I opted not to utilise my allocated time to cross-examine Mr Pemberton on Planning and Policy. I made this decision because I was entirely satisfied that Mr Barrett had highlighted key areas of contradiction within Mr Pemberton's testimony and addressed several questions which I myself was planning to ask.

Mr Pemberton failed to demonstrate that there was pressing need to justify the release of a green belt land and failed to provide reasonable reassurances that the development would not result in coalescence and encroachment.

Furthermore, and as Mr Barrett made abundantly clear, the proposal is clearly in contravention of NPPF, Greenbelt and River Valley Policies. There is simply no way around that fact.

## **Conclusion**

In conclusion Sir, I believe that this inquiry has served to demonstrate how inappropriate those development will be, and the fundamental absence of Very Special Circumstances.

After I gave my Evidence in Chief, Mr Warren stated that it is the job of the Inspector to remove emotion from the decision-making process. Mr Warren is entirely correct, although I would state that my own emotion which has been displayed from time to time is because I'm not just looking at dry documents and maps from a distance.

I am looking at our Tame Valley. A Valley cherished by all the local communities surrounding it. As my evidence has shown, it is the lasting legacy of the GMC to all generations. It is a green lung in a heavily urbanised area. I have called it the crown jewel of my constituency, and I stand by that statement. It is a gift. A gift that we have a duty to preserve, protect and to pass on to future generations.

It is special to the people I represent. Something I think has been clearly demonstrated by the exceptional interventions that interested parties have made over the course of the last two weeks. It is special to the people that William Wragg represents, and it is special to me personally. That is why I have acted as a Rule 6 Party at this inquiry.

The appeal does not fall within the identified categories of development referred to in the NPPF and the council's development plan policies that may be acceptable within

Green Belt. It therefore falls to be considered as inappropriate development and should therefore be accorded full weight and the appeal dismissed.

I know that on a few occasions I have strayed, or maybe slightly misinterpreted procedure, but I thank you for listening, for guiding and for your understanding. It is now for you, Sir, to make your deliberation. Thank you.