

Places for Everyone Representation 2021

Family Name	Brownhill
Given Name	David
Person ID	1287258
Title	Stakeholder Submission
Type	Web
Include files	PFE1287258_Redacted.pdf
Family Name	Brownhill
Given Name	David
Person ID	1287258
Title	Our Vision
Type	Web
Include files	PFE1287258_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	Special circumstances have not been met in order to build on the greenbelt
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Available brownfield sites need to developed first prior to developing on the greenfield
Family Name	Brownhill
Given Name	David

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Person ID	1287258
Title	Our Strategic Objectives
Type	Web
Include files	PFE1287258_Redacted.pdf
Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your written comment refers to:	6. Promote the sustainable movement of people, goods and information 8. Improve the quality of our natural environment and access to green spaces
Family Name	Brownhill
Given Name	David
Person ID	1287258
Title	JPA 3.1: Medipark
Type	Web
Include files	PFE1287258_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>This site is 100% greenbelt uptake and does not deliver the special circumstances needed to build on.</p> <p>The Draft GMSF 2016, states that the site was proposed for 86,000 m2 commercial floorspace. Document 10.01.47 - JPA3.10 was published in August 2018. The site is still today listed for 86,000m2 commercial floorspace. It has therefore not been reviewed with an effective timescale to consider the impact of Brexit, Covid-19 (which has reduced the requirement for office space) and the ongoing climate emergency.</p> <p>On page 19 section 2.4.11 it states how "In excess of 500,000 sqft of good quality office accommodation, with dedicated car parking, is currently available within close proximity to Medipark". The table it outlines with the space surprisingly does not list Roundthorn Industrial Estate or Southmoor Industrial estate. Both of these sites are located adjacent to the proposed location of Medipark. I do not have figures for available spaces within this area but I can assure you that there is a considerable amount of sites within these locations displaying signs for availability.</p>

Also on page 19, section 2.4.18 states "There has been no speculative development of office accommodation in South Manchester over 20,000 sqft for more than 10 years".

This is an extremely misleading statement. There is already development happening right now nearby. Airport City Manchester will develop 5 million sq ft of offices, logistics, hotels and advanced manufacturing space. (<https://www.airportcity.co.uk/>). Although this is briefly mentioned in Document 10.01.47 - JPA3.10 as a "competing site and location", in the Places for Everyone proposals, only the Global Logistics part of Airport City is listed as a development site - presumably because airport city is already under construction.

Also newly developed, although not in South Manchester (as its in Cheshire), Alderley Park is another site listed as notable competition. This is 11 miles away from medipark. It offers 1.5 million sqft of scientific, laboratory, office and conferencing space. Its notable that "The newly re-developed 150,000 sq ft "Glasshouse", opened in February 2020". (<https://www.alderleypark.co.uk/about-us>).

The fact that the supporting documents even mention that there is competition for the space surely proves that this does not represent the exceptional circumstances required to allow development on greenbelt. There should be no competition for this development to be necessary.

With the current office availability already existing nearby and the construction of airport city already happening, there is no need for further office developments at Medipark - which is 2 miles away.

Lining the banks of the Fairywell Brook with this development on one side and the huge housing development of Timperley Wedge on the Trafford side would be a flooding risk. The Fairywell Brook has no history of flooding but such vast construction is going to have a negative effect downstream.

Within my supporting documents you will see a link to a youtube video showing the flooding on site particularly along Dobinetts Lane and Whitecar Lane.

Document 10.01.46 - JPA3.1 indicates that the vast majority of the proposed land is of "High Archaeological Sensitivity" (Page 19). It should therefore not be developed on until a further work is completed.

There has been very little community engagement and community involvement in this. I received what can only really be described as a piece of propaganda through my letter box. It was branded as an expansion of the hospital with accommodation for doctors and nurses. In reality the plans in Places for Everyone, do not reflect this. A full consultation with workshop involving local residents should be undertaken.

The signs placed out around the site recently to inform the local population about the development are insignificant. You can only view them if you stop and and read whilst walking past.

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	<p>As this site is a cross boundary site, it should surely represent both developments? Only the Medipark development is seen within the notices. The notices do not include Timperley Wedge. A passer by could conceivably think that this might not be as destructive as they imagine, because of the extent of the other greenbelt in the area.</p> <p>The signs only are placed along the boundaries of the site. The notices should have been placed right throughout the community for bigger exposure. The signs are A4 in size with small print writing. You do not notice these signs if you are driving by. Ironically, you will notice the significant amount of huge billboards offering warehouse and office space within the adjacent Roundthorn and Southmoor industrial estates.</p>
<p>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</p>	<p>Put plans on hold until a full review of recent developments such as Brexit, Covid-19 and the climate emergency have been undertaken.</p> <p>Put plans on hold until Airport City construction is complete and a review of office requirements undertaken based on this new development.</p> <p>If the development is required - Review Roundthorn and Southmoor Industrial estates adjacent to the hospital. There are a vast amount of empty units and units to let. Work with occupants of the sites adjacent to the hospital and look to relocate them into the empty units elsewhere, leaving the sites next to the hospital empty. This can allow the development to take place within the site of the existing industrial estate as oppose to tearing up the green belt on the other side of the hospital. There is already one hospital building in this location - the Carol Kendrick Centre.</p> <p>The existing Wythenshawe Hospital staff car park was built on greenbelt land a number of years ago. This is a single story ground floor only gravel car park. The greenbelt in this area has already been breached because of this car park. According to Document 10.01.47 - JPA3.10 on page 15 "The site is covered by building height restrictions related to safe development heights around Manchester Airport. Development is limited to a height of 15 metres (around 5 stories). Why not maximize this site as a 5 story car park, thus enabling for 4/5 of the current car park to be released for development as opposed to breaching more green belt land. - The multi story car park would enable more cars to be park closer to the hospital.</p>
<p>Family Name</p>	<p>Brownhill</p>
<p>Given Name</p>	<p>David</p>
<p>Person ID</p>	<p>1287258</p>
<p>Title</p>	<p>JPA 3.2: Timperley Wedge</p>
<p>Type</p>	<p>Web</p>
<p>Include files</p>	<p>PFE1287258_Redacted.pdf</p>
<p>Soundness - Positively prepared?</p>	<p>Unsound</p>

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Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>Development on the greenbelt does not represent exceptional circumstances as there are alternatives and risks.</p> <p>Flooding risks associated by the development on both the Timperley Brook and the Fairywell Brook.</p> <p>Please review youtube video in link posted. This highlights current flooding and surface drainage within the site itself.</p> <p>It should already be known that the Timperley brook already floods downstream and developing further along it upstream is therefore likely to cause more issues. Please see article listed https://www.manchesternews.co.uk/2021/01/20/news/weather-pictures-of-cold-winter-conditions-for-warrington-bridle-land-in-somerset-philly-land/</p> <p>From the environment agency on the same date: "Timperley Brook at Altrincham" "River levels are rising at the Partington river gauge as a result of heavy rainfall and are expected to remain high until Friday. Consequently, flooding of properties on Green Lane to Woodlands Rd and Canal Rd is possible tonight, Wednesday 20th January and into tomorrow.</p> <p>The latter specifically highlights issues with Flooding of the Timperley Brook, downstream from the proposed development. Its also worth noting that Woodlands Road and Canal Road mentioned above are locations along the Timperley Brook after it passes through a natural flood defense slandscape of the greenbelt area of Altrincham Municipal golf course.</p> <p>The Fairywell Brook does not have a history of flooding beyond the fields where development is proposed. However, the majority of houses planned are along the length of the brook. On the Manchester side of the brook there is the proposed Medipark development. The brooks also starts at Manchester airport where further development is taking pace. It is extremely dangerous to propose all of these developments - particularly at once.</p> <p>Incidentally it is also worth noting that both brooks that flow through the development flow onto and into Carrington Moss, where a further huge development of houses is proposed.</p> <p>Although the traffic issues are resolved within the site itself, the amount of pressure this development will add to the existing network in the surrounding areas is extremely concerning. I dont have any figures but I would urge you to carry out traffic surveys on the nearby Park Road, Stockport Road, Brooklands Road and Chester Road to name but a few.</p>

The spine road proposed running from Thorley Lane to Clay Lane should NOT be built. Should the development go ahead the only spine road that should exist would be to direct traffic to the M56 and beyond. A spine road into a housing community of Timperley Village district itself only encourages car journeys and adds enormous pressure on the existing roads listed above.

There is one additional primary school proposed within the development. I am strongly contesting the figures provided to suggest that this one school can cope with the extra pressures that 2,500 family houses will bring. There is insufficient evidence that there are adequate school places available and that this is inconsistent with NPPF paragraph 95, page 28

On 28th September 2021, The Manchester Evening News reported ""Unprecedented"pressure on Trafford school places sees council plead for support".

Full article:

<https://www.manchestereveningnews.co.uk/news/greater-manchester-news/we-need-help-unprecedented-pressure-21701919>

Metrolink extension is not needed in this area. The network already exists between the hospital and the airport. A second stop at Wythenshawe hospital is not required. Metrolink extension should be focused on existing developments within Greater Manchester that do not have public transport. It shouldn't be used as an excuse to build new ones. Linking in with the schools comments earlier this Metrolink extension would not take children to schools in Trafford. This part of the Metrolink line goes through Manchester. Anyone travelling to a Trafford school (I imagine the most sought after schools would be the Altrincham ones) would need to travel on the Metrolink all the way to Cornbrook before heading back into Sale, Altrincham and Timperley on a different line.

Endangered species of Great Crested Newts exist within the area. Please see document attached listed "Grayson" published in 2020. This document suggests alternative routes for HS2 so well worth a read. However I wish to bring your attention to page 17.

GOLD CIRCLES - Great Crested Newt breeding ponds

BLUE CIRCLES - other ponds, some of which may also be GCN ponds.

Of critical importance is that breeding ponds within 250 metres of each other can be deemed to be a single METAPOPOPULATION which is essential for the long-term survival of the protected species. Not just UK and EU legislation applies to GCN but also the BERNE CONVENTION which the UK ratified.

A cluster of 10 to 12 GCN breeding ponds can be deemed to be of regional biological importance and therefore equivalent to a grade B or even grade A SBI.

That includes the intervening land if suitable to GCN feeding (earthworms are their main food on land), movement, daytime shelter and overwintering hibernacula.

Just slightly off this map is land associated with plot 1 of the Timperley Wedge Masterplan. There are residents in this area that confirm Newts exist within their garden ponds. The land now owned by Harlex was previously owned by Wyevale. In 2017 Trafford Council rejected plans for just 15 houses and 8 apartments on this site stating - Wyevale had failed to demonstrate that there were any "special circumstances which would outweigh the harm to the Green Belt", and that it had also been unable to demonstrate how the scheme would not harm the protected species of great crested newts on the site.

It is surprising therefore that the new owners, Harlex, less than 4 years later are proposing a mixture of 116 apartments and houses here (despite the fact that the Timperley wedge masterplan states that a 100% yield from this plot would provide 112 residential properties).

I would urge Trafford Council to look back at the reasons why they rejected 23 properties on the site in 2017 and what has changed (other than them declaring a climate emergency in 2018) since then. I would ask them to apply this reasoning to all the plots of land proposed for Timperley Wedge.

There is enough brownfield sites within Greater Manchester to build all of the houses proposed within Places for Everyone to avoid building on greenbelt land. Please review response from Save Greater Manchester Greenbelt for these figures. Because there are alternatives the plan does therefore not meet the needs for building on green belt.

Why Trafford?

The current average greenbelt across the 9 boroughs is 46.7%. The Trafford figure is 37.6%.

The average net loss of greenbelt across the 9 boroughs is 3.27%. The figure for Trafford is 6.7%.

Therefore, not only is Trafford already behind in terms green belt land available, it also loses double the average loss of other boroughs.

Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.

All development needs to be reviewed. Since the proposals were initially placed, we have experienced Brexit, Covid-19 and a climate emergency. The world is a very different place now.

Any office development removed. Unnecessary due to developments close by at Manchester Airport.

Brownfield sites within Greater Manchester reviewed and housing placed on these sites instead.

Spine Road from Thorley Lane to Clay Lane removed. This encourages car journeys into already congested residential areas.

Trafford Council to review their reasoning behind rejecting 15 houses and 8 apartments on plot 1 of Timperley Wedge in 2017 to now be considering 116 residential units on the same plot. The reasoning of the rejection for planning in 2017 should be applied across the full Timperley wedge development.

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	<p>Having said the above about plot 1 however, there is already development that exists there. Should there be no flooding risk and should the population of Great Crested Newts be able to be repopulated elsewhere development should be maximised in order to relieve the pressure on the rest of the Timperley Wedge area.</p> <p>Plot 9 which sits between Brooks drive and the Fairywell Brook is a beautiful little field. This should not be developed under any circumstances.</p>
Family Name	Brownhill
Given Name	David
Person ID	1287258
Title	JPA 10: Global Logistics
Type	Web
Include files	PFE1287258_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>The site is built on 100% countryside and adjacent to the SSSI of Cotteril Clough. It cannot be justifiable.</p> <p>Manchester airport and Manchester City council need to work together to retain this greenbelt. Its too easy and too lazy and too destructive to build on this land. Its time to think outside the box.</p> <p>On 19th July the rt Honorable Chris Clarkson MP raised the concern about his "Heywood and Middleton constituency and across Greater Manchester about the amount of greenbelt approved for release by the Greater Manchester Mayor, Andy Burnham".</p> <p>The Secretary of State for Housing, Communities and Local Government responded "This government made a manifesto commitment not just to protect, but to enhance the green belt. At the moment, planning policy is clear that building on the green belt should only be contemplated in the most exceptional circumstances. And we intend to continue that through our modernised planning system.</p> <p>I appreciate the pressure that my hon friend and his constituents are under as a result of the proposed Greater Manchester spatial framework, that does not seem to be according with</p>

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	<p>the wishes of the local residents. I hope that as we come out of the pandemic, Manchester City Council and others with a good record of house building and regeneration will find opportunities for imaginative building on brownfield sites and around the city centre".</p> <p>This is not the most exceptional of circumstances. There is no imaginative building proposed here and nothing has been reviewed as we have come out of the pandemic.</p> <p>Manchester already has the low percentage of biodiversity units per hectare within greater manchester, further loss of Greenbelt with this development and Medipark is unnecessary.</p>
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	<p>The amount of ground level only car parking space around Manchester Airport needs to be looked at. If the car parks along Runger Lane were developed into multi story sites this would create enough spaces to release the car park site off Wilmslow Road. Why not develop this as oppose to developing on this important part of the green belt?</p>
Family Name	Brownhill
Given Name	David
Person ID	1287258
Title	Trafford - Green Belt Additions
Type	Web
Include files	PFE1287258_Redacted.pdf
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>The level of green belt addition in Trafford in comparison to greenbelt lost in the borough is simply not justifiable. I personally will not be able to use this land due to distance and at the same time see local green space taken away from me.</p>