

Family Name	Fish
Given Name	Mark
Person ID	1287476
Title	Stakeholder Submission
Type	Web
Family Name	Fish
Given Name	Mark
Person ID	1287476
Title	JPA 3.2: Timperley Wedge
Type	Web
Soundness - Positively prepared?	Sound
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 conversion of green belt land to building plots and creating a continuous urban landscape from Timperley to the airport is a tragic loss. Access to green space has never been more important than in times of COVID with the communities benefits for mental and physical health through use of the existing recreational sports facilities in Timperley Wedge area, particularly between Ridgeway Road and Clay Lane. Specific issues I believe have not been adequately considered</p> <ul style="list-style-type: none"> - Conversion of Greenbelt to building land is not justified and against national policy and guidelines, and should be a path of last resort when other planning options like brownfield development have been exhausted. - Social, health and well being issues in addition to material demand for housing space and office space has been radically changed by the global COVID pandemic, no consideration of impact on priorities and needs following the COVID crisis have been made, in fact no reference is made to the importance of Green Space to health and well being post COVID is made. - The choice and decision criteria to convert Timperley wedge rather than Green Belt closer to Hale Barnes is not adequately explained in the proposal. The tenuous assertion of an historic deer park is not adequately supported by evidence, with no evidence of such in the historical record. Indeed no mention is made of the Rich historic record of the Timperley wedge for recreational, sport and agriculture. Ridgeway Road, formally Sugar Lane has a rich history that has not been adequately considered in evaluating which parcels of last resort Greenbelt should be considered. - Biodiversity has not been adequately considered, the farcical statements about a resultant net gain in Biodiversity have no supporting evidence or scientific basis. No specific details of how this Will be assessed are given, and no study of as is levels of ecology or biodiversity for the Timperley Wedge area are provided.

- Lost of recreational sports facilities and green areas for walking and recreation, need for these areas so important especially post COVID. How can sport and recreational land be converted, when this is do counter local policy and the NPPF guidance.

- There are also notable areas of river, surface water, groundwater and surface water flood risk. These environmental factors and increase in potential localised flooding from surface water runoff to nearby areas, like Ridgeway Road, has not been adequately considered. The current areas between Ridgeway and Clay Lane are often water logged.

The extent to which the Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. The report treats various major development sites in Green Belt, contrary to the importance attached to protecting Green Belt, as "a given", fails to consider options that constrain development or that make greater use of brownfield or previously released greenfield land, focuses on a range of options that involve developing on Green Belt around Timperley in order to protect Green Belt near Hale Barnes and does not consider environmental limits or impact on the next generation or that the use of last resort greenfield options by one generation.

The green belt appraisal is limited in scope to green belt functionality and consequently the review of land parcels completely fails to encompass the environmental objective of the NPPF (objective c) by not giving it the prominence it should within the appraisal.

Guidance for this is explicitly set out in paragraph 171 of the NPPF that ""Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework""

Furthermore as set out in paragraph 174 of the NPPF ""To protect and enhance biodiversity and geodiversity, plans should:

a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation""

There is little or no reference to this crucial policy guidance in the green belt review. This is unacceptable (see NPPF paragraph 170a - protecting and enhancing valued landscapes, sites of biodiversity ... in a manner commensurate with their statutory status or identified quality in the development plan)

I do not agree with the key messages as set out in this section as they fail to acknowledge that there is a strategic requirement to consider environmental issues (particularly impacts on the natural environment). Indeed this was one of the key concerns that came out of the consultation and is one of the three main objectives of the NPPF.

I question why the evidence for environmental issues such as non-statutory sites/ecological networks being ignored? Why are environmental issues missing from the report and detailed assessment of biodiversity measures missing?

The context of the plan MUST reflect the three main objectives (social, economic and environmental) of the NPPF in order to achieve sustainable development. It is unacceptable that key environmental issues are missing from the messages.

Redacted modification - Please set out the modification(s) you

The Places for Everyone plan should reconsider development of the Timperley Wedge Greenbelt area. Plans need to be revised to include:-

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.

- Details of the environmental impact, particular increased risks of localised flooding, mitigation strategy and a full assessment of current levels of biodiversity in the area.
 - Evaluation of the historic social, recreational, and agricultural history of the land between Ridgeway Road (formally Sugar Lane) and Clay Lane.
 - Explanation to how the Timperley Wedge area was selected vs Green Belt land closer to Hale Barnes
 - Detailed explanation of how a net gain in biodiversity will be achieved, founded on science and independent expert bodies.
 - Evidence that priorities and targets for new development have considered changes in demand, particularly for office space, post COVID.
- Destruction of precious Green Belt can never be reversed, and to consider this to be priority over alternative Brown Field development, especially given the social, health and environmental benefits of Green Space is highly unsound. Post COVID to have not considered the impact of this global event on demand, targets, needs, strategy and vision for housing and green space is undefensable and unsound.