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17th July 2011

Ms Yvonne Parker
The Programme Officer
Trafford Council
First Floor, Waterside House
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Dear Ms Parker

Trafford Core Strategy Examination

I refer to your letters of 6th and 8th July, which were addressed to my wife. I am pleased to tell you that she will be replying independently, but meanwhile I am enclosing my own comments.

I have not previously submitted any representation to the Examination, but please note that having read the Further Response to Inspector's Note 5 of 1st July, I wish to appear at the resumed Examination and make my representation in accordance with paragraph 2 of your letter of 8th July.

I would be grateful if you could keep us informed of the date for the resumed Examination.

Yours sincerely

David Eastwood

**Representation of Mr David Eastwood to Further Response to Inspector's Note 5,
dated 1st July 2011.**

Council's Response

Para 2.2. The future possible development of the Airport City Enterprise Zone and the relaxed planning regulations are likely to require additional sites bordering on the remaining Green Belt and open land, with a danger of encroachment

Para 2.9. I note that the DTZ report gives five reasons why the proposed development of Davenport Green [DG] should not proceed. I note also that the Council sees fit to disregard them or to contradict them.

Para 2.12. I note also that RLAM claims that "there is a clear and demonstrable need to allocate Davenport Green as a Strategic Site. However, the Council does not see fit to quote the reasons or the evidence given by RLAM.

Paras 3.2, 3.3. The Council does not support the inclusion of Davenport Green in the Enterprise Zone. This weakens their stance that it will remain protected "unless it can be demonstrated that it is required for an exceptionally high quality, deliverable and sustainable B1 business/office related development." In fifteen years no such demonstration has come. If the Council had determined that DG should be included in the Enterprise Zone, it would have proved their continued faith in the scheme and the fact that they have not agreed for its inclusion in the EZ indicates that they have perhaps less faith than they express.

Paras 3.5, Appendix R4 24.9, 24.13 and 24.14. Despite this pessimism, the Council states that there are no exceptional circumstances justifying the return of DG to the Green Belt, quoting PPG2. I claim that the Council's attitude is illogical. Only in the event of exceptional circumstances can land be removed from the Green Belt. Fifteen years ago the Inspector conceded that if the Council could demonstrate exceptional circumstances, it could be removed from the Green Belt and in theory it was to remain in the Green Belt until those circumstances came about. The passage of time has demonstrated that they do not exist and have not existed, therefore, depending on the interpretation of the situation, either DG still remains in the Green Belt, or alternatively it does not need exceptional circumstances to be returned to the Green Belt and its return to Green Belt status should be non-controversial and automatic.

Para 3.8. The Council seems to have changed its ground to some extent and states that the proposed 99HA Rural Park which is part of the DG proposal also appears to depend at least in part on the future of Airport City. This in turn probably involves the relaxation of the requirements for a high quality international standard development at DG.

Appendix A, Paras 4.3, 4.4. The Council has added the possible future expansion of Airport City and the Medipark proposals for UHSM as demonstrating a future need for the DG land. I suggest they have made no attempt to claim that these possible expansions are exceptional circumstances and that the above is merely trying to relax the criteria of fifteen years ago. I therefore suggest that their case remains weak.

Appendix C. Paras R4, S2, S3. It is admitted that transport accessibility and improvement of quality of life is low.

Paras S4, S5, S6, S7. It is admitted that there would be little or no effect on crime reduction, the reduction of poverty and social exclusion, the sense of community identity or the improvement of qualifications and skills of local residents.

Para S8. It is claimed that the future use of DG land for recreation would result in improvements in health. However to be set against this is the highly optimistic and as yet unplanned increase in public transport, which implies that much traffic will remain private.

Para S9 and Appendix D S9. It is claimed that the protection of DG would result in an improvement of the quality of the neighbourhood environment. However any protection it currently gets is no more and probably less than the statutory protection offered by Green Belt status. Moreover if there is an increase in footfall, it is inevitable that there will be more pollution.

Para E1, Appendix D, S2, E1. The objective is to reduce the impact of traffic on the DG area. However, it is admitted that public transport is as yet inadequate and is not included in the GMTU Transport Model. Clearly the proposed development would create an increase of traffic. Alternative modes other than the private car are aspired to. However, given that the only access routes are either from the M56 or via the narrow winding country lanes of Whitecarr Lane and Roaring Gate Lane, it is obvious that neither of the latter could cope with any increase in traffic. It is clear therefore that much new highway infrastructure would be required.

Para E2. Approximately 14.5HA of Greenfield land is required to be built on with obvious damage to the natural environment. Furthermore the proposed Rural Park will create more footfall, which is also an aspiration of Para EC3, the growth of tourism. Tourism has many advantages, but environmental protection and improvement is a conflict unless the greatest care is taken.

Para EC1. It is admitted that other Core Strategy policies will ensure that suitable sites will be brought forward. That being so, it would militate against the need for the DG proposal.

Para EC2. It is admitted that there is only a low likelihood of reducing disparities of disadvantaged areas. There is poor access to DG and what there is is not related to deprived areas.

Para EC3. I refer again to Trafford's tourism industry and in particular to the mention of protecting the setting of Dunham Massey Hall. I submit that this is irrelevant to Trafford, because the core of the Dunham estate is set in 3,000 acres of inalienable land belonging to the National Trust. With relevance to DG, as stated above, any substantial increase in tourism would have a damaging effect on its ecology and environment.

Para EC4. This paragraph states that there is likely to be insufficient sites in town centres to meet demand for office space. This statement conflicts with the commonly known fact that many even modern office blocks in Altrincham are wholly or partially empty at present.

Appendix D.

Paras S2, S3, E1, E3. It is admitted that road access to the proposed site is poor, particularly from deprived areas. The only solution would be for public transport to gain better access from the M56 or to create new roads or to widen or straighten the existing Whitecarr Lane and Roaring Gate Lane, thus causing considerable damage to the rural environment, which is of course in conflict with the stated aims of the proposal.

Paras S5, S7, EC1. It is stated that the development would have a positive impact on poverty and social exclusion. Unfortunately the local resident population is generally, though not entirely, of relatively low educational level and therefore would be able to take ancillary jobs of a low level. In this context EC1 has a revealing phrase when it

refers to the “highly skilled work force in Cheshire” which is virtually an admission that traffic from the south will increase, carrying high level people who cannot be recruited locally. It is therefore considered that most of the job creation would last only as long as the construction phase.

Para E2, S7. in addition to making a great play about the presence or otherwise on the site of the Great Crested Newt, the development would ‘create a substantial area of woodland’ and enhanced habitats for local fauna. It should be noted that woodland cannot be created immediately. It is a long term project and will only come to maturity in a generation or so. It is not detailed how the Rural Park will contribute to enhanced habitats. For any wildlife to find a suitable habitat, a reliable food supply is essential and it is unclear how a Rural Park would increase the food availability of the area.

Paras E5, E8. It is admitted that the construction phase will result in increases in consumption, production, waste and pollution. It should also be recognised that if several thousand people are to be employed in an area where at present very few are, there will be a considerable increase in waste, which will require extra traffic for its removal. The environmental impact will therefore be increased rather than reduced.

Para E9. It is admitted that there will be a negative impact on the most historically significant landscapes in the Borough and it is obvious that no mitigation will replace them. The creation of a Rural Park implies a desire to increase visitor levels and it is not specified what visitor services will be provided. One assumes that there will be a Visitor Centre, probably with café and toilet facilities, some sort of permanent or semi-permanent education provision for children, and some sort of recreation facilities, for example perhaps equitation, all of which would be a degradation of open land.

Sustainability Summary.

The proposals indicate numerous examples of negative impact on the ancient environment of Davenport Green and I have pointed them out in the above, so I do not propose to quote them again. Moreover I have specified numerous places in which the stated positive effects are actually over-stated and in which I have been able to provide counter-arguments.

It is also clear that the Council’s original recommendation was to abandon the proposals in their existing form and to return Davenport Green to the Green Belt, but the recommendation was re-written to reverse the recommendation. I suggest that the arguments in favour of retaining the proposals and keeping Davenport Green out of the Green Belt are remarkably weak, especially in that fifteen years have elapsed without any sign that conditions have become favourable for the development. I therefore request the Inspector to agree with my contention that there is no justification for keeping Davenport Green out of the Green Belt, that the proposed development should be abandoned and that Trafford’s remaining Green Belt returned to its previous status.