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| Application Number | 21/01171/OUT |
| Proposal | Outline application with all matters reserved other than access for the erection of a new residential-led, mixed-use development comprising residential dwellings (up to 2,150), local centres (including up to 1,300 sqm of retail, 1,600 sqm of commercial uses and 1,000 sqm of local community uses), a primary school, sports facilities, new vehicle, cycle and pedestrian connections, new bridge connection to Hattersley, construction of new site accesses from Mottram Old Road, landscaping and associated works and demolition of farm/agricultural buildings and stables |
| Site | Land Off Mottram Old Road, Hyde, SK14 3BE |
| Applicant | Tameside Metropolitan Borough Council |
| Recommendation | Grant subject to conditions; subject to prior referral of the application to the Secretary of State. |
| Reason for Report | <p>The application is for a major development; is contrary to the provisions of the development plan; is a significant application which would depart from Green Belt policy; and an application subject to an Environmental Impact Assessment.</p> <p>In accordance with the decision made at the meeting of Council on the 4th October 2022, the Speakers Panel (Planning) is to consider the application instead of Strategic Planning and Capital Monitoring Panel.</p> |
| Background Papers: | The planning application documents are background papers to the report. They are open to inspection in accordance with Section 100D of the Local Government Act 1972. |

1. SITE & SURROUNDINGS

- 1.1 The site comprises 127.6 hectares of Green Belt land in the Godley area between the settlements of Godley, Hyde, Hattersley and Gee Cross. It is known as Godley Green. The application site comprises largely agricultural land to the north and south of the A560 Mottram Old Road. The land to the north would be developed for housing, with land to the south of Mottram Road used for improvements to the natural environment. The application site is bordered by the strong physical features of Werneth Brook to the west, the Trans Pennine trail to the north, Manchester/Glossop Railway Line to the east and Mottram Old Road to the south.
- 1.2 Beyond the immediate boundaries, the Trans Pennine Trail (TPT) runs along a former railway line and separates the site from the St Paul's and Oaklands residential estates to the north. Further to the east is the residential area of Hattersley, recognised as one of the most deprived areas nationally. Beyond the southern boundary are some small areas of housing, with Werneth Low Country Park beyond and further west are Alder Community High School and residential properties off Grange Road South.
- 1.3 The topography of the site is heavily influenced by a series of cloughs, including those which carry Godley and Werneth Brooks. It is undulating and variable but broadly slopes downwards from south to north. There are some dramatic internal changes in levels, particularly around the brooks, which run within the steeply sided cloughs. There is also a network of smaller tributaries across the site. In total there are five watercourses which exit the site along the northern boundary being culverted through former railway embankments.

The Environment Agency (EA) flood risk map indicates that the whole site is within flood zone 1 and so is at the lowest risk of flooding.

- 1.4 Although principally agricultural land, the site includes a variety of habitats, such as ancient and semi-natural broad-leaved woodland, semi-improved grassland, arable farmland, ponds, hedgerows and scattered broadleaved trees. There are protected trees and woodland and local wildlife sites at Godley and Werneth Brooks, recognised as a Site of Biological Importance (SBI). The site is identified as grade 4 in accordance with the national agricultural land classification, which means it is poor quality.
- 1.5 There are a number of residential properties within the site, these are mainly clustered along Green Lane which runs south to north. Godley Stud Farm riding school is also accessed from Green Lane. There are no listed buildings or scheduled ancient monuments within the site boundary or immediately adjacent, although the Grade II Listed Hyde War Memorial Obelisk is located within 250m of the site boundary, in an elevated position overlooking the site from Werneth Low.
- 1.6 The site is accessed from the A560 Mottram Old Road. This routes northwards to its junction with the A57 Hyde Road and the eastern terminus of the M67 at Junction 4. In the opposite direction, the A560 routes through Gee Cross to the junction with the A627 Dowson Road and Stockport Road. The A560 then continues south-west to Bredbury and Stockport, with connections to the M60 at Junction 25.
- 1.7 The 341 (Glossop to Hyde) bus service operates hourly along the A560 Mottram Old Road with stops along the site's frontage. Hattersley train station is located immediately across the eastern boundary but is not directly accessible from the site. Godley Train station is located 400m north when accessed from the closest point on Brookfold Lane.
- 1.8 Hyde Town Centre and Hyde Leisure Centre are located 1.2km and 0.5km respectively to the west, and can be accessed most directly via the Trans Pennine Trail from the northern boundary. There are eight recognised public rights of way through the site to the north of the A560 Mottram Old Road. In addition, there are four on the land to the south of the A560 Mottram Old Road. All are shown on the movement and access parameter plan attached to this report.
- 1.9 A medium pressure gas main runs east-west and north-south within the site, in addition there is also a United Utilities foul Sewer. These features are subject to safeguarding easements along their alignment.

2. PROPOSAL

Background & Overview

- 2.1 The application is for outline planning permission for the erection of a residential-led, mixed-use development comprising residential dwellings, local centres, sports facilities, new vehicle, cycle and pedestrian connections, new bridge connection to Hattersley, construction of new site accesses from Mottram Old Road, landscaping and associated works and demolition of existing structures. All matters except for access are reserved for future consideration.
- 2.2 The proposed quantum of development is summarised as flows:
 - Up to 2,150 dwellings;
 - 1,300 square metres (sq.m) of retail floorspace
 - 1,600 sq.m of commercial space; and
 - 1,000 sq.m for local community uses.

2.3 The development seeks to achieve Garden Village Principles focused around two distinct village centres (east and west). The delivery period is stated as being across 15 years, which would equate to an annual average build out rate of 143 dwellings.

2.4 The retail, commercial and local community uses are proposed as follows:

| Land use | Use class | Parameters |
|--|---|---|
| <ul style="list-style-type: none"> • Shops • Financial and professional services • Restaurants and cafes • Indoor sport, recreation or fitness • Medical or health services • Crech, day nursery or day centre • Offices • Publish houses, wine bars, or drinking establishments | E(a) E(b) - E(g)(i) Sui Generis | Retail up to a combined maximum of 1300sqm, with a maximum of 650sqm per local centre. Maximum unit size of 350sqm. Up to 1,600sqm of E(b) - E(g)(i) and sui generis: <ul style="list-style-type: none"> • Medical centre not exceeding 400sqm • All other units not exceeding 300sqm • Sui generis uses to be limited to a) public houses, wine bars or drinking establishments, b) drinking establishments with expanded food provision, and c) hot food takeaways. |

2.5 The local centres could also include local community uses, up to 1,000sqm, these uses are not in the main considered to be 'town centre uses' as defined by the NPPF. The exact mix of uses will be determined through further reserved matters applications.

2.6 Figure 4.1 Land Use Parameter Plan within the Planning Statement sets out the approximate location of these two local centres. The Plan indicates one centre be located adjacent to Alder Community High School, serving the western neighbourhood and one to the east adjacent to Hattersley Rail Station and proposed multi-user footbridge. Although this is an indicative plan, it does set out the broad design principles relating to the local centres. The plan illustrates the potential form of these centres as high-density cluster of shops/services (up to four storeys, 15m in height) with flats above the shops creating a 'hub' for each neighbourhood. These hubs form the most densely developed part of each neighbourhood in terms of building heights and a key 'nodal point' for the development.

2.7 The applicant's Planning Statement acknowledges that the proposal is inappropriate development in the Green Belt that causes harm by definition. The applicant identifies that inappropriate development should not be allowed unless very special circumstances exist. The applicant sets out the approach they have taken to assess the proposal from paragraph 7.3 onwards of the Statement. They say that to determine whether very special circumstances exist, they have assessed the harm to the Green Belt, whether any other harm arises from the proposal and whether there are clear material considerations that have the potential to clearly outweigh any identified harm. The applicant states that they have assessed a comprehensive range of planning matters before drawing this together to undertake the necessary balancing exercise to consider whether very special circumstances exist. The planning matters assessed are as follows:

- Green Belt;
- Emerging site allocation;
- Prematurity;
- Housing delivery;

- Affordable housing delivery;
- Local centres;
- Protected green space;
- Open space and sports provision;
- Education provision;
- Highways and access;
- Design;
- Character and appearance;
- Energy and sustainability;
- Socioeconomic impacts;
- Health impacts;
- Ecology and arboriculture;
- Agricultural land;
- Lighting;
- Heritage impacts;
- Flood risk and drainage;
- Ground conditions and waste;
- Mineral safeguarding;
- Noise and vibration; and
- Air quality.

2.8 The proposed development is a schedule 2 development under the Town & Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) and an Environmental Statement (ES) accompanies the application. The ES provides a detailed appraisal of the site and development proposals. The ES has been supplemented during the course of the application process with two further addendums and additional information.

2.9 In addition to the Planning Statement and ES, the following documents have also been submitted in support of the application:

- Design & Access Statement (including Strategic Design Code & Building for Life Assessment)
- Parameters plans (including land uses and access)
- Illustrative masterplan
- Phasing Plan / Statement
- Entrance/Access Plans of Junction Arrangement
- Demolition Plan
- Energy Statement
- Mineral Assessment
- Outdoor Sports Facilities Statement
- Sequential Assessment for Retail and Main Town Centre Uses
- Statement of Community Involvement
- Sustainability Statement

2.10 The applicant considers development of the site would be delivered through a range of mechanisms and aligned to Garden City principles, which are indivisible and form an interlocking framework for the delivery of high-quality places through the following:

- Land value capture for the benefit of the community.
- Strong vision, leadership and community engagement.
- Community ownership of land and long-term stewardship of assets.
- Mixed-tenure homes and housing types that are genuinely affordable.
- A wide range of local jobs in the Garden City within easy commuting distance of homes.

- Beautifully and imaginatively designed homes with gardens, combining the best of town and country to create healthy communities, and including opportunities to grow food.
- Development that enhances the natural environment, providing a comprehensive green infrastructure network and net biodiversity gains, and that uses zero-carbon and energy-positive technology to ensure climate resilience.
- Strong cultural, recreation and shopping facilities in walkable, vibrant, sociable neighbourhoods.
- Integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport.

Access

- 2.11 The development would be served by five new vehicular accesses; these would be priority junctions onto the A560 Mottram Old Road. One access, plus an emergency access capable of accommodating up to 50 dwellings, would serve the western village; two access points for the eastern village; and one access for the land to the south of the A560 Mottram Old Road. This section would be reduced from 40mph to 30mph in order to accommodate the access junctions safely.
- 2.12 Within the site, the illustrative masterplan shows that the western village would be served by a primary access road that routes north before creating a loop road through the village to connect back to the site access. The eastern village's two access points would also route north and join in the centre before providing access to the local centre to the northern edge of the site. The existing junction between Green Lane and Mottram Old Road is to be retained in its current capacity but would not be a vehicle access point for the proposed development. Both Green Lane and Brookfold Lane are identified within the masterplan to be resurfaced and improved.
- 2.13 There would be no vehicular link between the two villages but there would be active travel routes to enable walking and cycling, between the two local centres. The illustrative masterplan shows enhancements and a change to the alignment of the TPT. This would, in the main, be located off the highway where it would be surfaced and drained appropriately. In addition, the plans also propose a number of cycle routes through the site.
- 2.14 Existing public rights of way would be retained and improved, including new surfacing, drainage, wayfinding signage and associated infrastructure. In addition to this, improved pedestrian and cycle facilities are also proposed to be delivered along the Mottram Old Road frontage and throughout the site.

Open Space

- 2.15 The applicant states that, at the moment, only 1% of the site is publicly accessible. The applicant is seeking to deliver a significant level of green infrastructure, including open space, landscaping and sports provision. Over 50% of the site is proposed to be made publicly accessible for the amenity benefit of future residents and existing communities.
- 2.16 The breakdown of proposed green infrastructure is as follows:
- Natural space /countryside (60.5 hectares) (13.04 hectares of which is existing ancient woodland and Site of Biological Interest (SBI))
 - Parks and gardens (4.68 hectares)
 - Amenity open space (3.23 hectares)
 - Area for formal sports (1.24 hectares)
 - Non-formal sports pitch (0.81 hectares)
 - Allotments (0.74 hectares)
 - Proposed new ponds (0.18 hectares)

- 2.17 On site, open space would include natural space and countryside, complemented with new woodland areas, parks and gardens, including equipped play spaces and community orchards, sports pitches, general amenity, open spaces and allotments.
- 2.18 There is a comprehensive approach proposed to improve access to areas of public open space. The proposals include; Local Areas of Play (LAP), Local Equipped Areas of Play (LEAP) and Neighbourhood Areas of Play (NEAP). They are distributed around the site, to ensure homes are within a five-minute walk of play areas. The scheme also includes the provision of sports courts, formal grass sport pitches, as well as a network of running loops, outdoor gyms, trim trails and event spaces for a variety of activities. These facilities would be accessible to all members of the public including those of neighbouring communities.
- 2.19 Ancient Woodland and SBIs would not be encroached upon, and would be protected by appropriate green space buffers.

Design

- 2.20 The Design and Access Statement includes a strategic design code comprising a primary (mandatory) and secondary code. The code would shape future development, where the primary code is linked to the parameters plan including the location and quantum of open space. The secondary code addresses detailed design matters to ensure the delivery of Garden Village principles. In addition to this, a Building for Life Assessment has been prepared with the majority of the criteria being scored as 'Green' and the single remainder being 'Amber'.
- 2.21 The applicant states that a range of parameter plans, in addition to the Strategic Design Code, have been informed by extensive design work and are considered to achieve a design of outstanding quality. This is reflected in the overall form and layout of the site's surroundings but raises the standard of the design in the locality more generally.

Education

- 2.22 The applicant identifies a need for additional education provision arising from the development, at both primary and secondary level. To address these needs, the proposal includes land for secondary school accommodation to assist with the expansion of Alder Community High School, and financial contributions towards primary, secondary and special education needs in the vicinity. The applicant states that the development suitably mitigates the impact.

Socio Economic Matters

- 2.23 The applicant states that the development would have a positive economic impact. A construction period of 15 years would result in the equivalent of £25m gross value added (GVA) and 550 jobs per annum. Once the development is complete, the economic benefits would come from a combination of the direct and indirect impact of new residents spending income locally and the provision of commercial floor space within the site. This would result in a total GVA of £60m and 590 jobs per annum. The applicant historic estimates that the council would receive £4m per annum in New Homes Bonus for the first 6 years.

Health Impacts

- 2.24 The applicant states that the submitted Health Impact Assessment demonstrates a significant net positive effect on health would be achieved both across the site and within neighbouring areas of Hyde and Hattersley. The creation of construction jobs, having better access to housing, open space and leisure activities is identified as having a beneficial impact to health, particularly in areas where deprivation is high.

Sustainability and Energy

- 2.25 The applicant states that the Council declared a climate emergency on the 25th February 2020. The applicant has therefore sought to ensure that the development is an exemplar scheme with respect to sustainability and energy use. In doing so, there is a confirmed a commitment to achieving net zero carbon in terms of its operational energy use, as well as a commitment to conducting life cycle assessments for each phase of development to promote the use of low carbon materials in the construction process.

Housing

- 2.26 The applicant states that the Council cannot demonstrate a five-year supply of deliverable housing sites. The proposal for 2,150 dwellings would make a significant contribution to council's requirement. The applicant considers this should be afforded very substantial weight when a decision is made.
- 2.27 The illustrative housing mix set out in the submitted planning statement is as follows. The actual mix would be confirmed through the submission of reserved matters:

| Dwelling Type | No. of dwellings | Percentage of Supply |
|----------------------|-------------------------|-----------------------------|
| 1-bedroom apartment | 254 | 12 |
| 2-bedroom apartment | 167 | 8 |
| 2-bedroom dwelling | 482 | 22 |
| 3-bedroom dwelling | 564 | 26 |
| 4-bedroom dwelling | 482 | 22 |
| 1-bed senior living | 133 | 6 |
| 2-bed senior living | 68 | 3 |
| Total | 2,150 | 100 |

- 2.28 The proposed density and height of the development is set out in a parameters plan submitted by the applicant. This identifies the main development plots and a minimum and maximum density and height for each. The lowest density areas are to be located around the perimeter of each village, being 25 to 35 dwellings per hectare, and between 2 and 3 storeys (10 to 12.5 metres). Medium density areas would be built at 35 to 45 dwellings per hectare, at similar heights. The highest density areas would be located at the centre of the villages at 45 to 60 dwellings per hectare and a height of 3 to 4 storeys (12.5 to 15 metres). The density in the local centres would be at 100 dwellings per hectare, reflecting that the accommodation here is likely to be apartments. The buildings would be up to 4 storeys (15 metres).

Affordable Housing

- 2.29 The applicant states there is a significant need for affordable housing within Tameside. The development proposes that 15% of dwellings will be affordable (60% affordable rent 40% affordable home ownership) and that the level of provision would help to address affordable housing requirements.

Delivery

- 2.30 The applicant states that where possible, demolition has been avoided, but to accommodate the development it would be necessary for the following buildings to be demolished:
- Godley Stud Farm and associated buildings;
 - Several stable buildings to the northeast of the site;
 - Far Meadow Farm and associated buildings;
 - The stable buildings of Brookfold Farm; and
 - The agricultural buildings of Greenside Farm.
- 2.31 The illustrative masterplan aligns the proposed land uses, design parameters and design code to demonstrate how the site could be delivered as part of subsequent reserved matters

applications. It is complemented by an indicative phasing plan which breaks the delivery into 8 phases:

- Phase 0 - Delivery of the access junction and initial spine road up to the western village centre. This phase also sees temporary improvements to key routes across the site such as the diverted Trans Pennine Trail and Green Lane.
- Phase 1 – Would include the delivery of essential infrastructure relevant to roads, drainage, flood basins, active travel networks, and public open space. It will also see the commencement of the delivery of houses, as well as key community meeting facilities and public realm works.
- Phases 2-8 – These phases will continue to deliver a mix of homes, as well as any additional infrastructure that each phase requires (essentially infrastructure not already delivered as part of Phase 1).

3. PLANNING HISTORY

3.1 There are no records of any significant planning applications within the site's red line boundary. Applications have typically related to householder development or minor development relevant to established uses. These are not considered material to the determination of the application.

4. PLANNING POLICY

National Planning Policy Framework

4.1 Paragraph 9 of the National Planning Policy Framework (NPPF) states that planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account to reflect the character, needs and opportunities of each area.

4.2 Paragraph 11 states that planning decisions should apply a presumption in favour of sustainable development. This means approving development proposals that accord with an up-to-date development plan without delay, as per section 38(6) of the Planning and Compulsory Purchase Act 2004. However, 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 the 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

4.3 Paragraph 12 of the NPPF clarifies that the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making. Where a planning application conflicts with an up-to-date development plan, permission should not normally 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.

4.4 Relevant sections of the NPPF include:

- Section 2 Achieving sustainable development;
- Section 6 Delivering a sufficient supply of homes;
- Section 7 Ensuring the vitality of town centres;
- Section 8 Promoting healthy and safe communities;

- Section 9 Promoting sustainable travel;
- Section 11 Making effective use of land;
- Section 12 Achieving well-designed places;
- Section 14 Meeting the challenge of climate change, flooding and coastal change;
- Section 15 Conserving and enhancing the natural environment; and
- Section 16 Conserving and enhancing the historic environment.

Development Plan

4.5 The adopted development plan is the Tameside Unitary Development Plan (2004), the Greater Manchester Joint Waste Development Plan Document (2012) and the Greater Manchester Joint Minerals Development Plan Document (2013).

Tameside Unitary Development Plan

4.6 The majority of the application site falls within the Green Belt. The exception is the area that crosses the railway line to the north-east that would facilitate the proposed bridge connection to Hattersley. This is unallocated.

4.7 There are two areas that are designated as protected green space: first located along the northern boundary of the site following the alignment of the Trans Pennine Trail; and second adjacent the site's western boundary along the alignment of Werneth Brook.

4.8 There are two designated Sites of Biological Importance (SBI) within the area identified for built development. These are at Werneth Brook adjacent the western boundary; and Brookfold Wood in the centre of the site. A third SBI, at Back Wood, is located on the land to the south of the A560 which is identified for the delivery of Biodiversity Net Gain. These areas include ancient woodland and grassland habitats.

4.9 Relevant policies are otherwise as follows:

4.10 Part 1 Policies

- 1.1: Capturing Quality Jobs for Tameside People;
- 1.3: Creating a Cleaner and Greener Environment;
- 1.4: Providing More Choice and Quality Homes;
- 1.5: Following the Principles of Sustainable Development;
- 1.6: Securing Urban Regeneration;
- 1.7: Supporting the Role of Town Centres;
- 1.8: Retaining and Improving opportunities for Sport, Recreation and Leisure;
- 1.10: Protecting and Enhancing the Natural Environment;
- 1.11: Conserving Built Heritage and Retaining Local Identity;
- 1.12: Ensuring an Accessible, Safe and Healthy Environment.

4.11 Part 2 Policies

- H1: Housing Land Provision
- H4: Type, Size and Affordability of Dwellings
- H5: Open Space Provision
- H6: Education and Community facilities
- H7: Mixed Use and Density.
- H10: Detailed Design of Housing Developments
- E7: Local Access to New Employment
- S3: New Retail Developments outside town centres
- S6: New Local Shopping Developments
- S7: Food and Drink Establishments and Amusement centres
- OL1: Protection of the Green Belt
- OL2: Existing Buildings in the Green Belt
- OL4: Protected Green Space
- OL6: Outdoor Sport, recreation and Play Space developments.
- OL8: Informal recreation and Countryside Access

OL10: Landscape Quality and Character
 OL 14: Allotments
 T1: Highway Improvement and Traffic Management
 T6: Facilities for Buses
 T7: Cycling
 T8: Walking
 T10: Parking
 T11: Travel Plans
 T12: Special Needs
 T13: Transport Investment
 T14: Transport Assessments
 C1: Townscape and Urban Form
 C10: Development Affecting Archaeological Sites
 C11: Shop fronts
 C12: Art in the Environment
 N2: Locally Designated Nature Conservation Sites
 N3: Nature Conservation Factors
 N4: Trees and Woodland
 N5: Trees within Development Sites
 N6: Protection and Enhancement of Waterside Areas
 N7: Protected Species
 MW1: Protection of Mineral Resources
 MW2: Supply of Aggregate Minerals
 MW3: Reclamation of Derelict Land
 MW10: Development on or near landfill sites
 MW11: Contaminated Land
 MW12: Control of Pollution
 MW13: Hazardous Installations
 MW14: Air Quality
 MW15: Protection of Water Resources
 U3: Water Services for Developments
 U4: Flood Prevention
 U5: Energy Efficiency
 U6: Renewable energy

4.12 Supplementary Planning Documents

- Residential Design Supplementary Planning Document.
- Trees and Landscaping on development Sites Supplementary Planning Document

Greater Manchester Joint Minerals Development Plan Document (2013)

- 4.13 The GM Joint Minerals Plan considers mineral resources and the needs of minerals development. The plan shows that a significant proportion of the site is designated as a Mineral Safeguarding Areas. This includes land to the north and south of Mottram Old Road. The land west of Green Lane and South of Mottram Old Road is safeguarded for brick clay. Land to the east of Green Lane and along the eastern boundary is safeguarded for sand and gravel. A small section of the eastern corner of the site is a safeguarded area for sandstone, part of a much larger designation which extends across Werneth Low and east towards Mottram and Broadbottom. Policy 8 of the plan is relevant within the context of the above.

Greater Manchester Joint Waste Development Plan Document (2012)

- 4.14 The GM Joint Waste Plan sets out a spatial framework for waste developments across the ten boroughs of Greater Manchester. It includes detailed development management policies and identifies preferred areas for a range of waste management facilities.

Places for Everyone Joint Development Plan Document

4.15 The Places for Everyone Joint Development Plan Document was published in August 2021. It was submitted to the Secretary of State in February 2022 and inspectors have been appointed to conduct an examination of it. It is a joint plan covering nine of the ten Greater Manchester districts, including Tameside, and is intended to provide the overarching framework to strategically manage growth across the boroughs. It contains both strategic and development management policies, allocates several sites for development, and establishes a new Green Belt boundary for the nine boroughs. Places for Everyone allocates the site at Godley Green for residential development, although the application site is larger than the proposed allocation. relevant policy is JPA31.

4.16 Paragraph 48 of the NPPF sets out the weight that can be given to emerging plans. It states that local planning authorities may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan; the extent to which there are unresolved objections; and the degree of consistency of the relevant policies in the emerging plan to the NPPF. Each can be considered in turn.

Stage of Preparation

4.17 Places for Everyone has been published and submitted, and its examination is on-going. All planned examination hearing sessions have concluded. The districts have submitted a list of proposed main modifications to the plan and changes to the policies map associated with the main modifications, amongst other things. Following this, the inspectors have issued examination document IN39 dated 11th September 2023. This states that the inspectors are satisfied at this stage of the examination that the list of proposed main modifications are necessary to make the plan sound and/or legally compliant, and would be effective in that regard. The inspectors have therefore indicated their position on the proposed policy content of the plan as modified, including the proposed allocations and revised Green Belt boundary. This, as set out within their note, is without prejudice to their final conclusions, reached after consideration of responses to the public consultation to be carried out on the main modifications. The consultation commenced on 11th October 2023.

4.18 On the basis of the above, progress towards the adoption of Places for Everyone is at an advanced stage. The plan is a material consideration, which a decision taker may lawfully take into account when determining a planning application. To that extent, it is considered that it would be unlawful to say that Places for Everyone was not relevant in this case.

The extent to which there are unresolved objections to relevant policies

4.19 Objections remain in place to the plan, including those made orally during the examination hearings, and a final report from the inspectors has not yet been prepared. However, the direction of travel expressed by the inspectors within examination document IN39 is clear. Although this is set out as an interim view, it is a strong indication in relation to the objections made that they can be resolved.

The degree of consistency of the relevant policies in the emerging plan to the NPPF.

4.20 Paragraph 35 of the NPPF states that plans are legally and procedurally sound if they meet four tests, including that they are consistent with national policy. As set out within examination document IN39, the inspectors examining the plan are of the view that the proposed main modifications are necessary to make the plan sound and/or legally compliant and would be effective in that regard. Therefore, whilst consultation on the main modifications is required, the inspectors consider that the plan as modified is, at this stage of the examination, consistent with the NPPF.

Weight to be given to Places for Everyone

4.21 The amount of weight to be given to Places for Everyone is a matter for the local planning authority to determine in accordance with paragraph 48 of the NPPF. Established practice and case law has founded two further caveats: that firstly, any such decision must not be an irrational one or so unreasonable that no other reasonable council would reach that view; and

that secondly, an emerging plan cannot be given as much weight as it would be given if it were adopted, i.e. full weight.

- 4.22 Whilst Places for Everyone cannot be given full weight in planning decisions, as it does not yet form part of the adopted plan for Tameside, it would be unlawful to give it no weight. Further, given the advanced stage reached in the examination of the plan and the clear direction given by the inspectors in respect of dealing with objections and compliance with national policy, it is reasonable to give Places for Everyone, as modified by the proposed schedule of main modifications, substantial weight in the determination of this application.

Planning Practice Guidance (PPG)

- 4.23 This is intended to complement the NPPF and to provide a single resource for planning guidance, whilst rationalising and streamlining the material. Almost all previous planning Circulars and advice notes have been cancelled. Specific reference will be made to the PPG or other national advice in the analysis section of the report, where appropriate.

National Design Guide (2021)

- 4.24 Illustrates how well-designed places that are beautiful, healthy, greener, enduring and successful can be achieved in practice. It forms part of the Government's collection of planning practice guidance and should be read alongside the separate planning practice guidance on design process and tools.

Other Considerations

- 4.25 The Tameside Corporate Plan 'Our People Our Place Our Plan' set out the Council's aims and aspirations for the area, its people and how it will commit to work for everyone, every day. There are 8 strategic priorities referenced within the plan.
- 4.26 The Tameside Inclusive Growth Plan 2021-2026 sets out 13 key aims for how growth is delivered, to ensure that Tameside can build back better from Covid-19, recovering in a way that brings a fairer economy for all. This includes inclusive employment and training opportunities for those most impacted by Covid-19. Godley Green is identified within the plan as part of a focus for investment as part of the strategic 'Hyde Triangle'.
- 4.27 The application has been considered having regard to Article 1 of the First Protocol of the Human Rights Act 1998, which sets out a persons rights to the peaceful enjoyment of property and Article 8 of the Convention of the same Act which sets out his/her rights in respect for private and family life and for the home. Officers consider that the proposed development would not be contrary to the provisions of the above Articles in respect of the human rights of surrounding residents/occupiers.
- 4.28 The application has been considered in accordance with the Tameside One Equality Scheme (2018-22), which seeks to prevent unlawful discrimination, promote equality of opportunity and good relations between people in a diverse community. In this case the proposed development is not anticipated to have any potential impact from an equality perspective.

5. PUBLICITY CARRIED OUT

- 5.1 The application has been advertised in accordance with the requirements of the Town and Country Planning (Development Management Procedure) (England) Order 2015, the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and the Council's adopted Statement of Community Involvement.
- 5.2 Publicity has been carried out three times as a result of the submission of information through the determination process. This has been in the form of press and site notices and notification of 10,061 properties.

6. SUMMARY OF THIRD PARTY RESPONSES

6.1 In response to the consultation undertaken there have been 4205 letters of objection received in addition to a petition of 4,459 signatures against the development. A total of 33 letters of support have also been submitted.

6.2 The following concerns have been raised within the individual objection letters, these are summarised under common themes as follows. Full copies of the correspondence received can be made available to view on request.

6.3 Principle / Green Belt

- Green belt should be protected and not built upon,
- All existing brownfield sites should be developed first;
- This scale of development should be distributed across the whole of the borough and not a single area;
- Green spaces need to be protected, Godley Green is valued asset for local communities it should not be lost for development;
- Loss of Green belt will be damaging to semi-rural character of the area;
- Concerns housing numbers aren't correct – not used the 2016 ONS population projection numbers in its latest draft of the GMSF/PFE despite those numbers going down and chose to use the higher 2014 numbers;
- The Covid pandemic has demonstrated the need and value for open green spaces;
- Sets a dangerous precedent for other areas of Green Belt within Tameside;
- Absolutely no requirement for the housing;
- Not as many houses needed as ONS population figures show a reduction in population growth;
- Functioning Greenbelt that provides a separation between Gee Cross and Hattersley, and the development would result in continuous sprawl from Hyde through to Hollingworth;
- Poor planned development which will be detrimental to the area rather than benefit it;
- Green Belt is designed to protect the countryside and prevent urban sprawl and should only be lost in exceptional circumstances. The proposals present no such exceptional circumstances;
- There is enough brownfield site within Tameside and Green belt should not be developed;
- Godley Green is an area highly valued and is used by many people for recreational activities (walking, running, cycling, riding) this will be lost;
- Focus should be on building acceptable, safe communities in a high-quality environment in Tameside;
- Thousands of existing residents will lose access to much needed accessible nature;
- Green Belt is precious, it should not be built on and to do so suggests hidden agendas;
- Experience of not being able to extend a domestic property in the Green Belt, how can the council support 2150 homes;
- Brownfield land should be developed first and there is plenty within Tameside, the former dye works on Clarendon Road being an example;
- Already enough housing in Hyde what is needed is social infrastructure;
- The proposals need to be scaled back;
- Has there been adequate assessment of the capacity of brownfield sites within the borough?;
- The developer only wants to build on greenfield land because it is cheaper;
- Green Belt land should be retained as community space – not built on for profit;
- Too many green space areas have already been lost;
- There should not be further loss of agricultural land;
- The Council should concentrate on reducing the housing allocation, and focus on providing good quality social and truly affordable housing on brownfield sites;
- Britain is already heavily developed;

- Green Belt is designed to protect the countryside and prevent urban sprawl and should only be lost in exceptional circumstances. The proposals present no such exceptional circumstances.
- Greenbelt was so decreed to protect conurbations from becoming one
- The existing green space supports a number of agricultural businesses which provide jobs
- TMBC needs to conduct a better audit of suitable brownfield sites than the current Brownfield Land Register – many are missing from the register.
- Public Rights of way on the land resulting in a loss of amenity to the public.
- Require new housing requirement models which are outdated.
- Greenbelt is a protected area covered by numerous laws and legislation.
- Unsustainable development
- Plenty of empty/derelict houses in Tameside that could be used instead;
- Contrary to preventing the effects of global warming;
- Should be focusing on preserving green spaces and improving the environment as a result;
- Government now objects to the Green Belt being built upon and has pledged to save Green Belt land across the country from development;
- Already been a refusal on similar grounds with a successful appeal on an industrial plan extension on Bredbury Industrial Estate due to building on Green Belt and destruction of wildlife;
- Werneth Low is too steep to build on and not accessible to people with mobility issues, Green Lane is the only flat area of Green Belt and countryside remaining in the area.
- This area of land will no longer be an area of outstanding natural beauty;
- Goes against everything we do to try and save our planet;
- Would be continuous housing developments from Hattersley to Hyde without a break;
- Other housing developments in Gee Cross that are already removing Greenbelt;
- Redevelopment of areas should come first – fix what is wrong first;
- The rest of Hyde will become a suburban slum left to rot;
- Plenty of empty houses in Tameside that could be used instead;
- Greenbelt cannot be replaced;
- Building a new town means existing towns are dying;
- The development is also being driven by the Homes England Grant, which appears to show the need for money is more important than waiting to see what PfE brings
- The government says greenbelt is sacrosanct – this is certainly not a green development and is just total urban sprawl with a false green tag
- The proposal completely overlooks the purpose of Green Belt – the essential characteristics are its openness and permanence
- Sheer destruction of beautiful countryside and Green Belt – the loss of which has been a common theme in Tameside of recent years;
- The few spaces of Green Belt remaining are precious in the urbanised area of GM and are the boroughs lungs
- Sheer destruction of beautiful countryside and Green Belt – the loss of which has been a common theme in Tameside of recent years;
- Valuable Green Belt enjoyed by many for a long time.
- Green Belt is supposed to be protected - No exceptional circumstance has been shown to warrant its removal
- Many other so called 'garden village' projects have been stopped across the country and so should this one.
- Green belt around Hattersley already non-existent- taking away huge chunk of this
- GMCA identified potential for 13,000 homes on brownfield land;
- Building a green village on green land does not make it green
- Tameside will just be joined up to Manchester;
- New sports fields won't reflect green belt- pay to play;

- Why is this land earmarked?;
- Hattersley 2.0?;
- Alternative sites suggested including Dukinfield Golf Course;
- Redevelop Hyde Town Centre or other areas over green belt;
- Land was a lifesaver during covid.
- Whilst the world is focussing on sustainability this is scandalous;
- Barratt Homes already have permission to build 24 sites in Hattersley;
- Fragmentation of fields and increased public access will not help the Green Belt;
- Garden Village not justification for the building upon Green Belt;
- Hyde is already overdeveloped as it is;

6.4 Policy

- Development is against National Planning Policy and local planning policy, including the land use policy and the local plan;
- The development conflicts with the five purposes of Green Belt, as outlined within the NPPF 2021;
- This is not a suitable solution to a nationwide housing shortage;
- Green Belt should never be developed;
- Contrary to Climate Change policy and is unsustainable and against aspiration of saving the planet, being contrary to the recent COP26 agreement;
- Development is contrary to up to date information on land use and housing requirements in the area;
- Development does not address the housing needs of the Borough;
- The selective changing of Green Belt land makes a mockery of its existence;
- The plan is against brownfield first policy.
- Contrary to land use policy and the local plan;
- There is a requirement to build on Greenbelt, but the scale of this development does not meet this;
- The area is larger than the area considered by the now redundant Greater Manchester Spatial Framework;
- Scale of the development is contrary to the recent COP26 agreement;
- What is the point is having 'protected greenbelt' land if the protected part is just going to be ignored;
- This is not brownfield first policy;
- No exceptional circumstances have been shown to warrant the removal of the Greenbelt;
- Spatial Framework suggests the standard of living in Tameside is low, yet this development only provides for more affluent people;
- Tameside's housing shortfall is 1155, and so no need for 2150 houses;
- Granting the outline permission should not pre-empt the development of a new local plan.
- Whilst additional housing is needed the size of this development is excessive and will have a negative impact on the surrounding area.
- Premature – NPPF 3.15 – “the planning system should be genuinely plan-led” “succinct and up-to-date plans should provide positive vision for the future of each area”. The application for GGGV is submitted prematurely as it is not contained in any approved or adopted Authority Plan. it is included only in a draft GMCA Planning for Everyone Plan yet to be examined in public and therefore un-adopted. Submitted a local application as TMBC do here is to pre-empt the democratic public consultation process there. The application claims that the Tameside UDP as a whole supports such large removal of Green Belt purposes, but seemingly there is no specific text as certainly required to underpin this general claim. (objection rec Jan 2022)

- A case for very special circumstances made of local housing need does not appear to marry with the intention of regional supply case made with PfE – local housing need even of an urgent kind is regrettably common and not nationally in any conceivable way an “exceptional” or “very special circumstances”
- The development would remove 124 hectares of green belt land and in absence of VSCs would not comply with chapter 13 of the NPPF.
- There is no mention of why this land is preferred over brown land and where the rights of way will be
- Loss of Green Belt is the worlds biggest problem at the moment as we battle against the climate change catastrophe
- Housebuilding in Hyde already exceeded quota;
- MHCLG 2018 published guidance which stated the ‘need for development’- space for affordable housing not a sound enough reason to gain approval;
- Not serving the 5 purposes of NPPF paragraph 138;
- GM Green Belt study had outlined how usage of GB land for development was to be granted in exceptional circumstances;
- No justification has been presented for the choice of a high growth option other than it aligns with the ambitions of the Northern Powerhouse; with economic growth being translated into the housing requirements where urban extension would be more appropriate;
- Believe funding should be provided for those who wish to renovate homes;
- NICE has stated that local councils must take air quality into consideration on all planning matters-
- Reuse of vacant homes first as a new policy;
- Boris Johnson stated that GB land should not be built upon.
- Development goes against government green deal;
- Contrary to UDP Policy OL1: Protection of Green Belt
- Central government pushes for brownfield regeneration- promised to do more at recent conference- how is this doing more?
- Contrary to the pledges/assurances regarding eco-systems and forests made at the COP25 UN Climate Change Conferences;
- Conservative Conference- promised no green belt land would be built upon

6.5 Infrastructure

- The existing infrastructure is inadequate to support a development of this scale;
- There's no guarantee services will be improved and infrastructure improvements would just mean extra roads, more noise pollution and a loss of countryside;
- Existing health services are overstretched;
- Inability to make Doctors and Dentist appointments within the area this will only worsen with additional demand;
- Where will additional Doctors and Dentists be accommodated;
- Already the transport network is stretched, and it would not cope with this further development;
- Refuse collection services are already stretched;
- There are no adequate plans to increase education capacity;
- Local hospitals cannot cope;
- Already a lack of social care provision within the area this will increase demand;
- Ambulance wait times are already stretched, and this will exacerbate the situation;
- The development will increase the population from anywhere between 4,000-10,000 people;
- Essential infrastructure should be built first;
- Infrastructure for existing residents needs to be improved before anymore development;
- Water treatment infrastructure and drainage is insufficient;
- Policing teams cannot cope with larger areas of housing;

- There is no mention of infrastructure for gas, water and electricity. Are the networks able to sustain a quality supply;
- There is not going to be enough to do in the area
- Road maintenance, cleaning and waste management is at an all time low
- Promise of cycle pathways and new road infrastructure ring hollow.
- Will create significant additional social problems for the area.
- The Bypass will not alleviate the traffic problems.
- Setting a preference showcase for a 'garden village' is not a good enough reason to blight an already pressurised infrastructure.
- Local farming infrastructure should be accommodated within the outline plan.
- No guarantees that the appropriate level of infrastructure and services will be provided.
- Not enough schools in the area to support the education of children;
- Not enough local shops;
- Delay in building the core infrastructure needed for the development;
- We don't need anymore retail space or sports facilities;
- The supporting infrastructure will not be built until first wave of homes are built;
- Lack of jobs to support the professionals buying the properties.
- The development is too large the size of a small town and in its own right will overshadow the existing area
- Hyde and Glossop will become busier with people dodging the end of the M67
- We should concentrate on what we already have and try and help our community this way instead of putting extra pressure and strain when not needed (Education etc)
- Would local reservoirs cope with extra people
- This will further exasperate the problem with flooding and sewage flooding into streams
- No pubs, social buildings, parks and only one shop;
- Local food industry will be needed;
- Hattersley already has a sports centre;
- Tameside Hospital already overstretched;
- New shops and leisure facilities needed in Hyde - night time economy low
- Bridlepaths will be made unsafe;
- No point building cycle paths with the amount of cars that will be added;
- Potential impact to the disabled- cannot currently support the less able already;

6.6 Education

- Alder School is already oversubscribed, there are currently 3 applications to every single space;
- The revised plans are no better than the original application. The previous application included a primary school. The Council should not have removed the primary school from the proposed plans;
- With an average of 2 children per home, approximately 4,000 children are proposed. How do you expect, Gee Cross, Godley & Hyde to cope with such increased numbers;
- Children will not be able to attend local schools and will be displaced further afield;
- Children within Hattersley cannot attend Alder school and have to travel to Longdendale and Hyde, the development will make this situation worse;
- The development includes no provision for additional school places;
- There is currently no 16-19 education provision within Hyde, and those students are required to travel further afield;
- Ration of development will outweigh the need allocation of Primary places;
- Postcode lottery for the children's education.
- Plans for a primary school but not a secondary school, unrealistic;
- No plan for new schools until further into the development where will children go?
- Nearby schools are already over subscribed;

- Over subscribed = poorer education for students;
- Loss of hobbies for children – riding schools lost;
- Local schools go into the Greenbelt for trips and learning opportunities;
- What will happen to the children who attended 3 schools on estates- Two Hattersley schools demolished and now another is being built- is the community expected to take this increase?
- Existing schools at secondary level are Longdendale which requires improvements by Ofsted and Glossopdale which is inadequate.
- No Ofsted rated “Good” schools in the area;
- No school places left for most vulnerable children, which need the support;
- Will end up at under subscribed schools elsewhere;
- Primary and special school provision has not been adequately considered

6.7 Transport

- Local road are already gridlocked and there is no capacity for this scale of development;
- Trains on the Glossop line are already overcrowded and Northern Rail have confirmed that there will be no additional trains;
- The bypass should be built first;
- There will be too many cars / vehicles trips from the development;
- Local journey times will increase as a result of the associated congestion;
- Lack of local employment in the area promotes commuting gridlocking highways;
- There will be an additional 4000 cars with the development. Public transport is underfunded, outdated, overpriced and unreliable. It does not provide a suitable alternative;
- Train station at Hattersley not big enough to cope with increase in use, needs major engineering works to cope with increase in capacity;
- Northern Rail cannot provide increased service on the Piccadilly-Hadfield line and vice versa as already at peak capacity
- Significant investment required with regard to both road and rail
- Not everyone will cycle or walk to work; as many walkways and cycle ways can be proposed, but they will not be used;
- The design of a garden village and people living without cars and adopting environmentally friendly ways of travel overnight is a false premise;
- The transport plans will not mitigate the concerns to enable the development;
- Proposed transport is not realistic;
- Existing transport is too expensive to consider using;
- Weather not good enough for cycling;
- Buses are too full.
- Hattersley Road West would be used as a through road from traffic coming off the M67 which would affect all residents
- The transport assessment for PfE by the GGGV enterprise shows the proposal is not ‘sound’ as there simply is not a sufficient amount of plausible infrastructure already in existence or planned to carry its journey load were it to be instigated;
- (Comments from a trustee of the Friends of the Trans Pennine Trail;
- The current proposals fails to completely understand the need for provision of a re-route of the Trans Pennine Trail (TPT) to create a safe and secure alternative to what is a national multi user walking, cycling and horse riding path and an international walking route;
- The existing route is along the A560 and Green Lane. the a560 is already a high usage road such that the TPT management have already seemed it unsuitable for horse riders and sustrans have declassified it as part of the national cycle network
- During the pre-app online consultations both ourselves and the TPT office proposed a far superior and safer alternative. Travelling east, the TPT would continue past Green Lane along the old railway line, which is still a Sustrans Path, to the Godley End.

- Main comments suggests alternative route (I have appended a copy to these comments)
- Full trains has a knock on effect to later services;
- Godley and Hattersley stations- not answer as on the same line;
- Hyde stations have limited parking and would increase traffic;
- No estimate on numbers of car journeys or residents or impact on cars using Lilley St Hyde or other junctions along Stockport Road and Mottram Old Road, driving cars to the bottlenecks at Halton Street and Lumm Road;
- Increase in car usage;
- Access for tertiary level pupils to closest education in Ashton- more cars?

6.8 Local Highways

- A57 & M67 have absolutely no more capacity , the development will increase journey times and also present safety risks;
- Development will exacerbate existing traffic issues;
- Rise in car journeys will be a direct contradiction to the aspirations of the Clean Air Zone;
- Traffic will be unbearable and people already struggle with journey times;
- The junction of the A628 , Stalybridge Road and Broadbottom road was omitted from the traffic analysis, other than to show that there will be an increase of 79 vehicles at the junction at peak am heading east caused by the development. This is approximately 10% increase on a road that is already over capacity and can at times see queues of several miles back down the motorway;
- Significant adverse impact upon parking especially near to schools;
- Gee Cross village will be absolutely gridlocked with congestion and parking;
- Local roads are already in a terrible condition the development will just make this worse;
- Traffic surveys were undertaken during the COVID-19 lockdown period, and do not represent a true representation of the traffic using already over-congested roads;
- The traffic reports advise that some areas are currently at capacity for traffic flow, but then state that the addition of 2500 additional cars would not have a detrimental impact upon congestion – how is this the case?
- Tameside refuse to improve the congestion and safety of local roads.
- Residents have had no upgrades to the road network in 30 years
- Increase traffic noise
- Narrow local roads not able to cope with increase in traffic (e.g. Gee Cross);
- Denton island not fit for purpose and Hattersley roundabout a mess at peak times;
- Hattersley built with many roads not having facilities for car access or parking;
- One road in and out will create bottlenecks;
- Appropriate transport solutions need to be in place before the project commences;
- Existing residents should be able to expect their current standards of commute to remain or improve and attention should be given to this;
- Tintwistle by-pass may mitigate but has been mooted for more than 10 years and not certain to be built at all;
- Increase in use of local rat runs such as Ashworth Lane and Broadbottom, which will lead to more roads becoming rat runs;
- Roads will be overused preventing access to supermarkets;
- Traffic will prevent access to Stockport;
- Takes 15 minutes to negotiate the rush hour traffic jam down Market Street in Hyde;
- Will make the road around Hattersley more of a nightmare;
- Traffic generated will not be handled by the small roads within village of Gee Cross
- Joel Lane, Kind Edward Road, and Stockport Road cannot handle congestion already;
- Most streets in the area are on way because of people parking on roads;
- Limited parking;

- Accessing the M60 from Bredbury is already a nightmare;
- Accessing the M67 is already difficult and traffic is already bad;
- The TFGM plans will not ease the traffic situation through Bredbury/Woodley to join the motorway network at the Brinnington junction;
- A journey to Glossop can already take over an hour for a 5 mile journey;
- Poor travel infrastructure
- Roads should be improved as a priority rather than building overpriced housing
- Insufficient roads to allow commuting to alternative areas
- Traffic already horrendous from Manchester/Sheffield;
- 2+ cars per house not sustainable
- Mottram Old Road already horrendous
- Object on basis of excess traffic- including Derbyshire CC's withdrawal of support for the Bypass and the 2 access points to the proposed site.
- Drivers will not take the alternative routes.;
- Proposed junctions on Mottram Old Road will not be safe and no mitigation is offered;
- Victoria Street/ Matley Lane is already a rat run;
- Hattersley Roundabout congested already;
- Buses and wagons already hold up traffic flow;
- 2100 cars anticipated- at least 1 car per household, potentially around 5000 extra cars;
- Roads treacherous with Spring Avenue and along Dowson Road;
- Already a significant amount of speeding drivers;
- Roads already in disrepair;

6.9 Health

- Damaging to physical and mental health of residents;
- This would result in the loss of a space for people to exercise outdoors;
- Green spaces are important for positive mental health and for physical health;
- Noise from the development will adversely impact on local residents;
- Light pollution will negatively affect residents;
- Locating thousands of people in one area will negatively impact upon their health;
- The benefit of green spaces have been felt during the COVID-19 pandemic – they should not be lost;
- There are health problems within Tameside, and taking away green space will exacerbate this through additional pollution;
- The development will take a decade or more to complete, and will cause mass and irreversible pollution during this time;
- Process has caused extreme anxiety to neighbours and residents.
- After Cop26 it is obvious this sort of planning is redundant and short sighted.
- Loss of light natural light as a result of the development
- Development will take too long to establish, neighbours will have to endure noise and dirt and disruption to settled life for 15 years,
- Impact upon health as a result of pollution from increased traffic;
- The development has far-reaching health consequences that outweigh its potential.
- Lack of doctors, dentists etc will impact on people's health;
- Godley riding school would have to be removed, which helps keep the community active and provides therapy for children with needs;
- Children with Asthma and other Bronchial issues will experience more exposure to poor air quality;
- Development will cause earlier life expectancies;
- Tameside is already one of the unhealthiest localities in Greater Manchester.
- During the pandemic, areas such as Godley were a means of saving our mental health and these green belt areas showed their true worth to the people of Tameside.

- Removal of Godley Green Stud – an excellent piece of Social mobility providing affordable equestrian activities
- Building on a landfill
- Noise.
- Goes against any Tameside Wellness initiatives;
- Will exacerbate the rat issue already caused by new builds;
- Higher incidence of early death rates- more pressure on local hospital
- High incidence of COPD and asthma;
- Link between air pollution and Alzheimer's;
- Birth rates falling in the local area- is there need for this?;
- Stepping Hill Hospital already oversubscribed;
- Tameside Hospital A&E is always overwhelmed;
- Area has high levels of health issues- should not take away land used for recreation.;
- Stress levels caused by virtue of confinement by conurbations.
- Length of development could have health issues- noise, pollution and dirt as well as stress;
- River has high microplastic contamination alongside raw sewage release- will effect the water treatment infrastructure;
- Childhood obesity high on the Tameside agenda;
- Life expectancy- how will this be affected;
- Where is the demand for new leisure facilities

6.10 Design

- Scale of the development is too large for the Godley;
- Far too many houses are being proposed;
- Development represents Urban Sprawl and will be damaging to the environmental character;
- Out of character and over populating the local area;
- Is there no possibility of CGI imagery being put forward so at least people can actually see what is being proposed.
- The design of a garden village and people living without cars and adopting environmentally friendly ways of travel overnight is a false premise;
- Proposal claims to make land more “accessible”, but people who purchase the houses will not want to put up with lots of kids and people near their houses;
- We need more parks, playground facilities and outdoor gyms;
- This is an estate, not a ‘village’;
- Proposals to provide leisure and amenities are too little for the proposed additional dwellings.
- This is not a housing estate, it's a new town;
- Houses will be crammed in;
- Will completely impact the feel, look and views of local area
- Housing not in keeping with surrounding area;
- Will lower the quality of living in this area;
- Will create another satellite community- failing to build a cohesive borough;
- Green village is not an appropriate name. doubt it will be anything like a village;
- No mitigating plans in place for the local population;
- People won't walk or cycle from this area;
- Not enough community clubs nor child play areas;
- Poorly thought out plan;
- Reduces access to green space;
- Development is far too big.;
- Would make Hyde and Tameside much less desirable place to live.;
- Want to exercise in countryside, not a development;
- In no way a garden village;

- No place in town planning for vanity projects;
- Would demolish the individuality of Gee Cross and Hattersley;
- Development of the scale is unsustainable given the lack of suitable infrastructure;

6.11 Landscape and Visual

- Don't agree with the demolition of older properties with character and history like farm buildings.
- Impact on Visual amenity
- Leave site as a beautiful bit of scenery.
- Please keep this beautiful green area
- Impact upon scenic views;
- Setting of Werneth Low will be tarnished;
- Whilst portrayed as a grand development it will doubtless be modified to something far less attractive;
- Development will ruin the countryside and be a blight on the countryside;
- Will be an eyesore/blot on the landscape when viewed from higher levels and street level.
- Do not wish to see more housing spilling out into countryside;
- Borders Peak District- Area of Natural Beauty;
- Walk up to Werneth Low will be lost;
- Plans look out of character with rural and farming views enjoyed by local residents;
- On border of Peak District National Park;
- Green Infrastructure parameters plan is inconsistent with the land use parameters plan;
- No need to have building height or density restrictions within the site to certain properties on Green Lane

6.12 Ecology, biodiversity and Trees

- Loss natural habitat and impacts upon biodiversity will be severe;
- No assessment of the environmental impact;
- Development will decimate the habitat of many species. The UK is one of the most nature depleted countries in Europe, plans such as this add to the problem;
- Valued habitat for deer, squirrels, water voles, sheep, cows, foxes, hedgehogs, owls, bats, badgers, sparrow hawks, buzzards, herons, redwings, frogs, great crested newts, diverse bird population and toads etc. Some of which are endangered and all of which will be lost or impacted upon through loss of habitat;
- Proposed recreation routes will be damaging to valued ecosystems;
- The scheme will result in significant tree loss;
- Trees have recently been cut down, with more tree loss to come;
- The proposals represent environmental vandalism;
- Greenbelt is needed to keep wildlife and endangered species safe
- Borders ancient woodland which would suffer serious disturbance.
- Geese rest on the land
- No mention of the equestrian facilities being relocated – Established facilities are being cast aside.
- Greenbelt is invaluable to the equestrian community.
- Demolishing grazing land and stable facilities and proposed for an improved bridleway - Where will the horses on the green belt go?
- Increase the eco-system around the area.
- Loss of green corridor between Hattersley and Gee Cross
- Development close to two sensitive natural habitats; Great Wood and Back Wood;
- Scare bird breeds such as woodcocks and lesser spotted woodpeckers;
- The natural appeal of the Trans Pennine Trail will be further diminished;
- The area is renowned for its landscape and proximity to Werneth Low Nature Park;

- Current use of the land helps with local nature overflowing from Werneth Low Country Park;
- The site is an SSSI and should not be touched.
- Losing Godley Green ecosystem will be a major loss to the green infrastructure of the area.
- Godley Green is on the north side of Werneth Low. The area not only gets its own share of rain, but also the run-off from Werneth Low. This means the water table is quite near the surface and there are numerous small ponds scattered around the many fields. Whilst this limits the scope of farming, it supports a significant biosphere: deer, badgers, foxes, rabbits, birds of prey and many other species of bats, newts, and other freshwater animals and plants.
- Homes for horses will be lost
- Recently noted that more than a quarter of bird species in the UK are now at risk, the UK is also one of the least wooded areas in Europe.
- The idea of a 'green village' sounds great, but if you're replacing swathes of incredibly green area for a much smaller portion of green space, it doesn't make any sense.
- No guarantee that this will stay green, look at Hattersley, It has slowly had all its green spaces removed.
- We don't all want to live in a concrete jungle with a few green spaces around
- This is an extremely effective part of what keeps the areas air clean (Clean Air Zone)
- To claim this is eco-friendly is farcical;
- Large pond areas which definitely have protected species in;
- Global warming;
- Land should be used for rewilding;
- Horses are going to be made homeless;
- No mitigation for the displacement of the wildlife in the area;
- Rare species and threatened wildlife affected
- Parameter plans are not aligned to root protection areas identified within the AIA,

6.13 Economic

- Loss of jobs within the rural economy;
- The site's location remote from Hyde Town Centre will not help stimulate the regeneration of the Town Centre. The economy of Hyde Town Centre and its urban regeneration would be better served by concentrating new Residential development around the Town Centre on brown field sites;
- The development will support city centre economies, rather than town centres which are run down;
- There are little potential of jobs for people within the local area, which will mean more people commuting;
- Will deprive people of leisure opportunities in the great outdoors;
- Hyde is already rundown there will be no benefits;
- Where will these residents shop
- Hyde Town Centre lacks development and has had no investment.
- Hyde Town centre needs investment first
- No suitable compensation for the development given the volume of houses, roads and other infrastructure being built.
- Affect local businesses
- The existing green space supports a number of agricultural businesses which provide jobs
- Money should be used to develop town centres
- The retail space is not needed, there is more than sufficient retail space in the area of which a significant amount lies empty.
- No supporting information to substantiate claims that Godley Green will provide more opportunities for jobs.
- Development will result in the loss of local farms/businesses;

- Keen to see assurances that there will be employment opportunities for those less able to navigate traditional employment methods;
- Area is already oversaturated, additional footfall and residence will adversely affect the quality of life for existing residents for miles around;
- What are the benefits of this development for Hyde?
- More profit made by developing on Green Belt, than on Brownfield sites;
- Environmental cost of losing valuable farming land;
- This Greenbelt is an important asset for the local community and businesses;
- The development would push people out of the area;
- Why spend millions of pounds on tree planting exercise;
- Detrimental to local house prices;
- Where will the money come from for new schools, shops etc?;
- The development is premature in economic terms;
- Will add additional strain to an already bankrupt council;
- No doubt that the development will bring investment long term, but does not outweigh the harm;
- New residents won't spend money in derelict towns, they will spend it in Manchester/Stockport.
- More profit made by developing on Green Belt, than on Brownfield sites;
- Threat to livery yards and Godley Stud riding school;
- Farms are working farms- income into the area needed and to provide resources post Brexit;
- Job density figure is 0.6 – massive estate with no jobs?;
- No existing support for Hattersley's night-time economy;
- What employment is being set up?;
- Hattersley small shopping precinct bulldozed and replaced by a single shopping store'
- Will only benefit city centre economy;
- Failure to balance existing housing/commercial space;
- Will not provide uplift to the borough's economic and welfare benefits
- Cllr Cooney states an uplift to Hyde economy of 500 new jobs year on year for 15 years- and a boost of £50 million- how will this be measured?;
- Not cost effective;
- Hyde needs investment; it has been hit hard by the recession and loss of local industry';
- More local employers needed in Hyde;
- Design of Market place in Hyde is poor and has caused the decline;
- Widening the wealth gap in the area;
- Social amenity space lost in one of the most deprived areas;

6.14 Drainage & Flooding

- Loss of greenfield land will result in additional flooding;
- The effects on downstream valleys/properties to the North of the proposals could be significant and flooding could occur. It is likely that off-site sewers will be required to connect to the existing foul/combined system towards the A57 (Mottram Road). Surface water will probably need considerable attenuation measures. I really hope United Utilities have been consulted and have voiced their concerns;
- The area already takes a lot of ground and surface water from surrounding areas which slowly dissipates into local brooks and streams;
- The proposal would divert existing watercourses and raise the groundwater level within surrounding areas, presenting a flood risk to areas not currently suffering from higher ground water levels, and the structural damage this may cause;
- Would cause excessive surface water run-off issues;
- The flood risk report demonstrates that local authority drainage engineers have advised that further assessments would be required, and that no guarantees would be provided in respect of flood risk;
- Loss of infiltration and natural drainage areas;

- Increase in excessive raw sewerage;
- Water treatment infrastructure and drainage is insufficient;
- Increase in rainfall and surface water resulting in additional flooding.
- Limited attempts to address watercourses
- Dwellings will create isolated enclaves backing onto streams, dead areas for dumping with no foreseeable amenity use
- Who will compensate home owners when their homes flood
- Watertable could be maximised and rainfall flow downhill to existing properties and businesses.
- Risk of flooding from increase in houses;
- Godley Green is on the north side of Werneth Low. The area not only gets its own share of rain, but also the run-off from Werneth Low. This means the water table is quite near the surface and there are numerous small ponds scattered around the many fields. Whilst this limits the scope of farming, it supports a significant biosphere: deer, badgers, foxes, rabbits, birds of prey and many other species of bats, newts, and other freshwater animals and plants.
- Existing raw sewage release into the river
- Wetter climate will turn the site into a sponge;
- There are natural springs in that area- how will the drainage cope;
- Land below the proposed area such as the St Paul's estate is naturally boggy- will need greater area needed for drainage;
- Green Lane already floods- how will this hold up with a tarmacked surface;
- Flooding has become worse since newbuilds;
- Green land soaking up rainfall, with the lack of it will cause flooding;

6.15 Air Quality

- This will worsen due to additional vehicle movement;
- Green spaces are important for the health of the climate and this development is therefore unacceptable during a climate crisis;
- This development will worsen air quality, whilst the upcoming clean air charge is supposed to lead to cleaner air;
- It will directly impact upon people with asthma and other breathing conditions and worsen their condition;
- The site absorbs a lot of pollution and is a valued 'Green Lung' this will be lost;
- The development goes against the Council's commitment to reduce emissions;
- The homes proposed should be eco-friendly;
- I want my children to grow up in a less pollution, not more
- Increased carbon footprint of private vehicle use resulting in a lack of clean air
- Green belt designed for fresh air and space not for housing.
- The development will reduce air quality and undermine the quality of life for residents.
- The Clean air zone is being introduced and the idea is to build not affordable homes without proper and effective public transport therefore people having to drive resulting in more pollution, the development contradicts the clean air act.
- It will directly impact upon people with breathing difficulties and worsen their condition;
- One acre of grassland is Godley Green produces enough oxygen for 64 people to breathe per day and absorbs 3400lbs of CO2 per year;
- Common knowledge that we already have a reduces life span as a result of poor air quality and this development will further shorten it;
- Plans to impose a clean air charge, though not increasing transport infrastructure will force people to use cars;
- Adding CO2 tons in the building process;
- The on going emissions in use as homes;
- A disgrace that on one hand we are all having to suffer the clean air tax,, and on the other a huge clean area could be demolished

- The Godley Green development contradicts both Tameside Council's and the governments aim to decrease pollution and preserve the green belt.
- With increased awareness of climate change and the need to protect biodiversity I find it incredible that such a scheme is being proposed.
- Access to green space will require car journeys from then on;
- TMBC are increasing their footprint whilst the country is trying to reduce it;
- Period of development will cause irreversible pollution;
- No public transport increase= more air pollution from new cars;
- Expected electric vehicles to reduce fumes- will charging points be included?;
- Cars will be adding to the particulates in the air and can cause harm to all;

6.16 Affordability

- Few properties available for lower income families;
- Development will not provide a level of affordable housing which is desperately required;
- These will be executive homes way beyond the reach of most people;
- Development is for the middle classes only and is completely unaffordable for working class people;
- The proposed homes will be overpriced and not affordable;
- If there is a need for the housing development, then 100% of it should be affordable;
- Keen to see that a good proportion of varied housing is provided;
- Development not supportive of the provision of social housing for residents of Hyde
- Social housing needed for communities
- Young people and families are already priced out of the area, this development will further drive up prices locally;
- TMBC website states that only 1400 affordable homes are required, this development is for 1000 more homes than needed and none will be affordable for the next generation;
- Desperate need to replace social housing lost to the right to buy;
- Houses not affordable for first time buyers.
- The houses will not be affordable so they will stand without being bought for years
- £250,000 is not affordable- another posh village for the rich;
- Unaffordable housing on what should be protected greenbelt;
- 51% affordable housing- how does this promote social inclusion
- How does the housing strategy 2021 reduce inequality by promoting young professional renting;
- Difficult time for people to buy with high inflation and reduced earnings;
- Housing waiting lists are huge;

6.17 Historic Environment

- Loss of historic amenity from the local area;
- Impact upon historic buildings within the site will be severe;
- The loss of ancient hedgerows, fields, woods and very old historical farm buildings would destroy the heritage in the area is shocking as the historical part of this part of Hyde and Gee Cross will be lost forever;
- Local history was destroyed when houses were built on the air raid shelters near Godley school.
- Insult to the memory of those who are listed on the memorial which overlooks the site
- Historic identities of the local areas will be eroded
- Removing the heritage of the area;
- Removing historic farmland;
- Object to removal of ancient woodland.
- Put the money into salvaging Hyde library and other buildings;
- Archaeological finds will be destroyed and historical soil.

- Iron Age, Roman and Saxon findings- due to land slippage further evidence could be found;
- Loss of ancient woodland- “The Great Wood”;
- Historically enjoyed area of beauty lost;
- Big part of Hyde’s natural beauty;
- Loss of cultural identity- making area a suburb.
- Should remain a rural town;
- Will threaten and destroy important historical and archaeological features- many of which are misunderstood
- Community created space is being destroyed;

6.18 Safety & Future Generations

- Childrens lives will be put at risk from additional congestion and disruption;
- Compromising the needs of future generations;
- Create safety issues for pupils of Alder and Trinity Schools;
- The development will affect the safety of horse riders;
- The development would result in the loss of horse riding facilities, including those used by children;
- Health and safety concerns associated with the development;
- I want my children to grow up in a less pollution, not more
- Money should be spent on giving youths something to do and somewhere to go;
- Already an increase in anti-social behaviour in the area, more people in the area will add further increase;
- More traffic will cause safety issues for children on the roads;
- Risk to the safety of horse riders;
- Future generations should be able to enjoy the green space like we have;
- Godley Stud provides an educational service for the community, to ride ponies and not hang on the streets, this will be demolished;
- Scale of development will put lives in danger;
- Increase in traffic = increase in road accidents;
- There are currently no play areas for children;
- No future generations as people will be forced out of their town.
- Greenbelt must be protected for future generations
- The population of the UK is currently in decline and as such the council should reconsider their position and reduce the amount of new building taking place
- What will our future generations get to see?;
- GB supposed to be protected for the wellbeing of future generations;
- Handing developers a free ride and they will not be there to fix the legacy of town centres nor the derelict former industrial sites;
- Our children are suffering from the air pollution already
- No facility coverage and crime is spinning out of control;
- Children use this route home from Alder School;
- Children will not have the protected green belt land to exercise and play upon;
- Absence of safe road access for cyclists;
- We need this to secure a healthy and sustainable future for our children and our planet.
- Falling birth rate already in Hyde;

6.19 Environmental

- Increased noise pollution;
- Increased light pollution;
- Carbon footprint must be reduced rather than encouraged by more cars, homes and roads;
- Increased waste;

- Need Greenbelt to save our planet;
- Destroying the eco-system;
- Gas appliances should not be used in the houses proposed.

6.20 Loss of Equestrian Land

- Loss of Godley Stud farm is unacceptable and provides an essential facility for children;
- Do not want to lose the Godley Stud Farm riding school and livery;
- The Godley Stud Farm and riding school is an invaluable asset to the area and community.
- Horseowners- where do they take horses as farm land lost;
- Changing the space as we know it will be detrimental to the local riding schools and livery farms;
- Grazing land destroyed;

6.21 Process / Neighbour Notification

- Notification to neighbours is just a box ticking exercise, the views and opinions will not be listened to;
- Development disregards the views of local residents who fund the council;
- Consultation process is flawed, many people wishing to make comments via the online system get timed out;
- ;
- The costs of financing the development should be provided in comparisons to brownfield sites;
- There has been no face to face communication with existing property owners;
- The traffic survey was commissioned by the same local authority which submitted the application, and which will be determining the application, which represents a conflict of interest. Independent traffic surveys should be commissioned, where no conflict of interest exists;
- No leafletting of the local population
- Who do we sue when we have been lied to?
- The criteria given to these plans will not be adhered to on completion.
- The process has been managed appallingly and we have not been consulted appropriately.
- Been consulted with very little despite significant promises.
- Elected individuals have been barely seen throughout the process.
- You haven't had the decency to tell the farmer that his property will be demolished. Appalling.
- Application should be looked at by National Government.
- Democratic deficit due to poor official publicity and communication from Tameside council about the development.
- No official literature has been received in the post.
- Online documents are not easily digestible.
- The handling of the process does not show Tameside in a good light;
- A long standing elderly resident had been assured that his property would not be compulsory purchased (CPO), however, heard via the local press that his home and business would be demolished;
- Do not believe that the consultation on the plan has been carried out in accordance with the statement of community involvement;
- Numerous inconsistencies with the planning application. Information and plans have been withheld from the public with little local involvement;
- Information purposely kept away from the public;
- A resident who is not online and has made this clear is not told about any developments to the application;

- Insufficient notice given to residents in respect of consultation period;
- Insufficient public notices put on the site;
- People who do not live in the vicinity should not be voting for this to happen;
- Why go ahead with this when none of the local residents want it;
- No wonder the public have no confidence or respect for the government of local authorities;
- Seems the development will go ahead anyway;
- The public are wasting their time;
- The Council will start the project and not complete it. Why make plans and do nothing with them?
- The local authority appear to be rushing this through because of the loan they have taken to fund it. Without properly considering such a development. Which is why I object and believe such an improper and poorly planned development shouldn't go ahead.
- The councillors supporting this plan and pushing it through are ignoring their constituents and also live nowhere near the site.
- Many members of the community are unaware that this development has even been proposed/
- The consultations that have so far taken place have been on Zoom and therefore are not inclusive of those who are not online/ did not know about the sessions.
- The people who live near the area do not want this development to take place but are being ignored.
- Consistency of planning approval- process questionable at very least;
- Disgusting that planning has even gotten this far;
- Land Owners are being forced through bully-boy tactics;
- Traffic studies have been carried out throughout the pandemic and as such are not reflective of the true circumstances;
- Studies are biased and misleading;
- No reason to build upon this to ease workload of civil servants and developers;
- Using policy from 2014 is outdated;
- TMBC trying to satisfy all housing requirements in one fell swoop;
- Time taken to develop= upheaval;
- Threats and trespassing by staff to push elderly out is unacceptable;
- Spaces including Godley Brook- are these low priority and therefore able to be built upon;
- Tameside have failed to inform residents other than a few posters on a footpath;
- No one has received consultation leaflets;
- Why does Tameside constantly validate applications for the green belt.
- Council has not followed the procedure with the Development plan;
- Concerns over how much consultation was delivered digitally with no consideration for those who cannot use these;
- Pandemic provided convenient excuse for traditional approaches;
- Too much has been committed to allow for an objective review of the situation;
- Precedent of compulsory purchase orders after giving assurances that people would not suffer this is to be deplored.
- Disgraceful to include the compulsory purchase of people's homes and businesses.

6.22 Tameside Council

- The application is motivated by greed and not the needs of the local residents;
- Supporters advocated additional Council Tax revenue but do not acknowledge the demand on services;
- The Council should not be considering their own financial gain from this scheme;
- The scheme would benefit certain councillors and MPs;
- The additional Council Tax raised will not become reality for many years;

- Lack of respect of local residents and landowners;
- The council is hypocritical and should not be promoting the development;
- Very short-sighted of the value of the green environment;
- The council promoted a big deal about planting a tree for every resident and are now proposing to dig up vast amounts of woodland;
- The council objected to the loss of Green Belt land at Denton / Bredbury, they should not be supporting this development;
- Allegations of corruption;
- The Council should never consider developing Green Belt;
- Incredible when people mental health is so low that the Council would support this development;
- The Council should be ashamed of running rough shod over Green Belt policy;
- The Council does not have the slightest moral upstanding or appreciation for doing what is right;
- Development is being rushed by the Council with no thoughts on the long term impacts;
- The council have already used up every piece of green space on Hattersley, Godley green should be protected;
- Council is arrogant to support this development;
- The development goes against other Council commitments to improve wellbeing and reduce pollution;
- The development goes against the Council's commitment to reduce emissions;
- Councillors should lose their election by supporting this development;
- The Council is hypocritical in supporting release of Green Belt land, whilst implementing green zones elsewhere;
- The council have acted unlawfully and morally in their pursuit of this project
- Lining Pockets of local councillors
- Who will be held accountable when things go wrong?
- Labour has failed the people of Hyde with these plans
- Tameside applying for planning to Tameside seems a huge conflict of interest.
- As a taxpayer I feel let down by those who are supposed to be working for me to govern the local area.
- The council is suppose to represent its constituents and protect area of natural beauty
- The council is voting on its own proposal to implement a huge vanity project that has dragged out for many years.
- Seen as a Cash grab
- TMBC need to go back to the drawing board and use some imagination and expertise to find an alternative solution to meeting their ridiculous and greedy targets.
- No reduction in council tax or any other package being considered
- The council have constantly refused to consider alternatives.
- How will Tameside council deal with developers who choose to use viability statements to avoid paying their section 106 monies.
- The letter of support from the council is disingenuous.
- Council appear desperate for government funding
- Development is a means to generate income to cover the previous mismanagement of finances;
- Tameside Council using figures from 2014, which are outdated;
- Tameside Council promoting the Greater Manchester green air policy while ripping the green lungs from a community is laughable;
- Tameside issuing compulsory purchase orders (CPO) to residents;
- A long standing elderly resident and upstanding citizen had been assured that his property would not be compulsory purchased (CPO), however, heard via the local press that his home and business would be demolished;
- Councils in the Lake District, Derbyshire and other beautiful green areas would never consider a development of this scale;
- Do the Council have a local plan for Hyde?

- TMBC should consider regenerating Hyde Town Centre, rather than selling off its assets;
- A couple of Labour Councillors disagree with the proposals, however they have to agree for it to go ahead to follow the whip;
- Already a done deal;
- TMBC does not complete projects – plans submitted to shops opposite Tesco on Stockport Road, residents were uprooted, however, the development never happened;
- Why are Tameside allowing a development of 2,150 houses when the figures show a shortfall of 1,155;
- Have the Hyde Councillors voiced any objections?
- The Council have notified residents that there is not sufficient funding to collect bins on a fortnightly basis, how will thousands more homes reduce this burden;
- Local Councillors and the local MP ignoring the views of residents;
- Council services are currently poor before the additional requirement/needs.
- How a Labour led council can consider approving such development is hard to believe;
- The Council do not want to take on the more difficult challenges of redeveloping what has become rundown;
- Public's interest cannot be at the heart of the Council if this land is destroyed;
- How many people pushing this idea forward actually live in the community?;
- Relying on consultations and assessments is erroneous – patterns of work may change and the climate emergency become paramount;
- The Council is not fit for purpose, you can stop this, like Stockport did.
- Money making exercise for Tameside Council;
- Appalling and short-sighted approach by Tameside Council who are also blatantly ignoring the presence of brownfield sites in the area;
- Cannot fathom how any of the local councils feel it is appropriate to build more houses on Godley Green. There has been so much objection to this proposal and then the advocate compulsory purchases on top is not short of criminal.
- The UK is governed as a democracy, where individual property rights are respected, so I am not sure on what legal basis TMBC feel able to CPO private land for their planning purposes and profit. If, as I suspect, this is in any way dependent upon GGGV inclusion in PfE again such steps would be premature, and accordingly should be dropped.
- Tameside Council should be offering our greenbelt the upmost respect it deserves rather pursue the Homes England Grant at all costs.
- The authority argue that the extra revenue will be beneficial – the reality is the opposite because they will still need to finance the additional public services required such as education, police, fire and Dr services amid already rising costs for Council tax payers
- Give go ahead for all Councils and Businesses to have a right to sell off and build upon GB land, will set a precedent;
- Council should set an example;
- Fed up of green space being taken up by developments
- Will be ignored by planning.
- Whilst sewage is being released into the river, Cllr Brenda Warrington's GMPF invests in UU.
- Project is a vanity project for the Council;
- TMBC have done nothing but bury their head in the sand and have failed to take on board any public feeling- shows the contempt towards the residents
- Council needs to be a pioneer in climate change;
- Council could force developers to build on Brownfield sites- as seen in Manchester, Stockport and Salford;
- Council need to focus on reducing housing allocation;
- No-one has the right to take the land of the people- least of all the Council and corrupt Councillors;

- Seems like a way for TMBC to increase the commercial and financial profile of the Council area;
- Council is breaking old covenants regarding building on green belt;
- Should Tameside be forced to meet the inflated OAN figures?- opportunity to stand up and do something sustainable like the truly carbon zero development.
- Cllr Kitchen has the power to do as he pleases;
- Spend money on the roads instead;
- TMBC ignoring duty to cooperate with other councils, asking them to take housing need;
- TMBC only concerned with revenues from the development as stated on notifications from TMBC;
- No thought to people living there;
- Council should focus on the problems elsewhere instead of higher ups pulling strings to line pockets;
- Labour Council is a disgrace and should be ashamed of the way they are treating electorate;
- Compulsory Purchase Powers promised not to be used.
- Contrary to instructions of residents;
- Tameside do not have the best interests of the population at heart;

6.23 Other

- It is an absolute disgrace that so many people have objected to this planning application and it's still going ahead.
- The Godley Green planning application is a poorly proposed infrastructure of housing, based on an outdated model or profiteering rather than serving the needs of the community;
- Potential increase in Crime;
- Development conflicts with the Mottram bypass;
- Seems a simplistic solution to a complex Borough wide problem;
- Greedy developers just want to develop Green Belt land because it is cheaper;
- Ridiculous concept and is motivated about profit only;
- Many buildings sitting empty which could be knocked down and used for the same reason;
- Recent developments within Hyde have seen no benefits for the Town centre which remain a ghost town, they'll be no benefits from the development;
- Adverse impact upon Gee Crosses village character;
- Direct adverse impact on the established communities around Godley Green;
- Will increase subsidence;
- Will increase incidences of fly tipping;
- Development is too large;
- Demolish Morrisons and build there;
- Will be visible from Werneth Low country park and will ruin views and character;
- Hyde has been overdeveloped and cannot take more;
- Local groups currently use this valuable space;
- The scheme allows profiteering for construction companies;
- This would lead to people losing their homes;
- Residents' homes are being compulsorily purchased, even though it was assumed they wouldn't be;
- Misrepresented by local MP;
- The development of Hattersley was considered a mistake, and this development would be similar;
- Two businesses, riding school and a farm on site on their own land who do not want to be forced to sell

- Home already on the land. Why get rid of what is already there to then have to get planning and build on it.
- Current residents will move out of the area
- Will create significant additional social problems for the area.
- There are two 'Phase Ones' and two 'Phase twos' what are the timeframes?
- Unneeded and poorly planned.
- Conflict of interest between the rights of the local resident community and the developer's aspiration.
- Taking land for sporting facilities
- There will be an increase in litter and fly tipping;
- The original Hattersley development was a terrible mistake, stigmatising people and isolating them from the rest of the community and this development will do the same;
- Will only line the pockets of a few greedy people;
- Complete overpopulation of the area;
- Chose the property to live in because of the nearby Greenbelt;
- GREEN is the keyword in the proposed development, yet it will tear down the GREENbelt;
- Political parties droll on about saving the planet but are only concerned about conserving the economy;
- Worries about the future of properties directly adjoining the housing development;
- Taking land that belongs to others;
- The land is damp and so difficult to build on;
- Increase in population = increase in crime;
- Concentration on regeneration rather than eliminate an already amazing local beauty spot
- Tameside have chosen to use the separate brownfield register for identifying the available brownfield land instead of the original list from the SHLAA. The criteria for the list was much narrower and a number of large and small plots were dropped. Again bringing into the question the actual demand figures.
- Causing extreme distress to existing residents
- Horses, farms, walker freedom, cyclists and horse riders all gone
- Community morale has gone;
- Will be creating another Hattersley estate, which will be full of immigrants and paid to live here;
- People will need to place their horses elsewhere;
- MP Jonathan Reynolds had stated that NO houses would need to be demolished;
- Would recommend reading Charles Montgomery's work;
- Loss of trails and bridlepaths;
- Stables provide leisure pursuits for children
- Want to be proud of Tameside that leads by example;
- Impact to property due to construction traffic and traffic in general;
- What is the proposed method for dealing with extra household waste
- Water- there is an expected 709,000-809,000 litres a day- what is the plan for waste water
- Approx 18,000kg of CO2 produced per home- how to produce this in target with reducing carbon emissions by 48%
- Surrounding areas cannot sustain accessibility without serious disruption;
- Conflicts with the local land use and loses Godley Stud Farm and equestrian centre;
- Phasing plan should be revisited to ensure that landowners land can be brought forward within an early phase.
- Trees within group G44 should be removed to ensure the effective use of land.

6.24 Representations made in support

- Gee Cross is short of bigger houses for people to move up the property ladder without moving out of the area;
- Will open up the area for more footpaths and bike paths as at the moment it is all just private land;
- It will bring new jobs into the area and will be a lovely place to live right next to Werneth Low Country Park;
- The investment into sport areas to improve the area will have a great huge impact on the local area;
- Barriers on all sides to stop spreading into local area;
- Reduce the need for building on urban green spaces;
- Help fund council services;
- Cate purposeful community amenities without solely impacting on existing ones;
- Useful bridge to Hattersley station reduced need to drive to the station;
- Plenty of amenities;
- A good thing for the economy;
- Built to vision e.g. new school, medical centre, sports facilities & infrastructure upgrades including garden village vision – green areas, ponds;
- Good for jobs in the area and local businesses;
- Hyde town centre likely to benefit from extra people and custom;
- Tameside is in desperate need for family homes;
- This area is a great place to live, with good access to the city centre and the countryside;
- Anything that creates more economic activity in Tameside is positive;
- People against the development are just NIMBYs who deny the opportunity to others or embrace change;
- need to expand, will provide income for the area, added need for transport will result in an increase in services;
- More homes are needed, this is a reasonable place to build between Hattersley and Newton/Godley where the impact on the environment is small.
- Recognise that we need more housing

6.25 Barratt Homes

- Comment that the site is suitable and available for development and is deliverable. Barratt Homes supports the site coming forward for a residential-led mixed-use development as the proposals will ensure transformational change for the area and will deliver significant social, economic and environmental benefits for Tameside and the local community. Barratt Homes also considers that there are very special circumstances to justify the granting of outline planning permission on the site.

7. RESPONSES FROM CONSULTEES

7.1 This section sets out a summary of the comments made by statutory and non-statutory consultees. Full copies of responses are available to view on the council's public access website.

Local Highway Authority (LHA)

7.2 The LHA has undertaken several reviews of the applications supporting Transport Assessment following subsequent amendments. They confirm that they are now satisfied with the updated analysis and comments that have been provided and support the

application, subject to a number of planning conditions. The comments can be summarised as follows:

- 7.3 Transport Assessment & Addendum - The Transport Assessment Addendum explains that the original Transport Assessment was submitted in October 2021. An updated Transport Assessment Addendum (TAA) was produced to address various comments received on traffic and transport matters. The TAA explains that National Highways removed their holding objection. The TAA has been produced to respond to comments from the LHA and Transport for Greater Manchester (TfGM).
- 7.4 TfGM comment on trip distribution that the source data was the same, but the method of assessment was different. The TAA explains that the different approach to assess trip distribution the approach was broadly the same, but some wider analysis and inbound assessment was undertaken to address some concerns which resulted in some change on specific routes. TfGM did advise that the earlier method should be used but with some refinement in Stockport, which has been undertaken. The 'with development flows' are provided as an appendix along with the raw data which was requested by TfGM. As a result, the LHA/TfGM consider that the flows are as agreed and no further comments are required.
- 7.5 Opening Year and Future Year - National Highways in its response dated 12th May 2023 has indicated that on the basis of the transport evidence, the development proposals would not have a severe impact and are therefore supportive of the development subject to a recommendation to attach a planning condition to any application approval that is granted. The condition relates to:
- the provision of a dedicated travel plan co-ordinator;
 - the southern connection to Hattersley station should be implemented at the earliest opportunity;
 - traffic counters to be provided at the site accesses to monitor traffic on an ongoing basis;
 - a working group to be established for the management of the travel plan; and electronic charging points to be provided in housing and district centres.
- 7.6 Growth Factors - The LHA indicated that confirmation of the acceptability of the growth rates and future year assessment would be required from TfGM. The TAA notes that no further comments have been received from TfGM on either of these matters. In their formal response TfGM did not comment on these matters other than to advise that they consider the flows are as agreed and no further comments are required.
- 7.7 Conclusion - It is acknowledged that the Transport Assessment has undertaken considerable and complex analysis of the trip generation and traffic distribution of the proposed development. Junction capacity modelling has been undertaken at a number of locations across the highway network. TfGM and National Highways are satisfied with the trip generation and trip distribution analysis that has been produced for the Development.
- 7.8 TfGM is satisfied that the trip rates are as per those agreed previously. TfGM has required mitigation measures to be included at a number of junctions and some of this mitigation will include the contribution to the SCOOT traffic signal monitoring system, Cameras, VMS and Automatic Traffic (ATC) / Cycle Counters (ACC). This will come to a total cost of £181,960.
- 7.9 The LHA/TfGM have identified that Hyde Road / Lower Bents Lane will operate over capacity during both peaks in 2040 and as such, require schemes to be explored to review the capacity at the junctions to mitigate the impact of the Development traffic, which would need to be funded by the Applicant.
- 7.10 Transport investments are identified for delivery as part of the GGGV and these are welcomed.

- 7.11 The LHA recognises that the phasing plan is conveying complex information over a long timeframe. The applicant has agreed to a condition relating to the phasing plan.
- 7.12 The LHA had concerns regarding the necessary sustainable transport infrastructure to support walking, cycling, bus and rail journeys not being planned for implementation until significant amounts of housing has been delivered. The LHA firmly believes that that sustainable travel infrastructure should be delivered much sooner within the delivery of the development. The Applicant has committed to a condition relating to the phasing plan details that will deliver the infrastructure at an earlier date than was initially proposed.
- 7.13 The LHA has identified the need to provide high quality active travel upgrades/provisions from the development to Stockport MBC's boundary and to link to the existing cycling/walking infrastructure within the Borough, to promote sustainable modes of transport and reduce vehicle journeys. A scheme is currently being developed by the Council, along Stockport Road/Dowson Road, which has the potential to provide 1.8 km of active travel infrastructure along this corridor and potentially funded through the Phase 2 of the Active Travel Fund (ATF2) and Capability and Ambition Fund (CAF).
- 7.14 The LHA requested the bus service implementation be reviewed so that a greater proportion of residents have direct access to bus services on the internal road network of the GGGV at an earlier stage in the delivery of the Development. The TAA had agreed to the principle of funding for bus services and further advised that a condition is agreed so that the phasing plan details are provided. The total cost would be £1.4 Million
- 7.15 National Highways has removed its holding objection and now request a condition on the travel plan, including management and monitoring. TfGM has commented that it is understood that the trip rates to be those as previously agreed and that no further comments on that part of the analysis is required. TfGM has provided comments on traffic modelling and junction mitigation and are now satisfied that all matters have now been agreed. The Trans Pennine Trail has raised a number of comments and the applicant is requested to consider those points further.

Transport for Greater Manchester (TfGM)

- 7.16 TfGM raise no objections. They comment that a response has previously been provided by TfGM dated the 14th December 2022 in respect of the development proposals. Since this time, TfGM has engaged with the applicant and the Local Highway Authority (LHA) and have carried out several reviews of updated iterations of the transport assessment work. An updated Transport Assessment Addendum (TAA) was submitted in July 2023 which has been reviewed where the trip generation and distribution assessment work is agreed. TfGM Urban traffic Control (UTC) is satisfied that the junction modelling work is acceptable, and the previous comments have now been addressed.

National Highways

- 7.17 In their latest consultation response they raise no objections to the proposals and their previous recommendation to condition a Green Travel plan still stands. In their previous response they commented that a number of sustainable measures are proposed which would reduce the impact of the development on the surrounding road network. These help to reduce the need to travel and improve travel choice by enhancing and promoting more sustainable modes of transport. These measures include:
- A network of pedestrian and cycle routes throughout the site connecting to other routes to enable onward travel by active travel modes.
 - Cycle parking across the site.
 - A bus route through the site with indicative details in a Bus Strategy.

- A new southern connection to Hattersley station for trips towards central Manchester and Glossop. National Highways Planning Response (NHPR 22-12) December 2022
- A Travel Plan featuring a number of hard and soft measures.
- The development of local centres and improvements to local education facilities to encourage a reduction in external trips.
- High-speed broadband connectivity to allow residents to work from home.

7.18 National Highways in support of the proposed active travel and public transport improvements, which is in-line with the Circular's vision-led approach to planning. National Highways recommend that further work is undertaken to establish a detailed strategy for active travel and that, where possible, sustainability measures are implemented prior to the occupation of the first dwelling. We would also seek to be involved in a future working group to monitor the Travel Plan and the impact of the sustainable measures.

7.19 In their latest comments they state they reflect upon the updated Traffic Assessment. They confirm that overall, the traffic figures and distribution lead to lower traffic volumes hitting key locations on the SRN junctions. Whilst there is an increase on some arms, the areas of most concern (including the M60 north-bound off slip at Denton Island (-60 vehicles compared to the original TA)) see a reduction in traffic using the updated distribution. The findings of the report do suggest that there may be longer queues on the A560 arm of M67 J4 in the morning peak (+68), but as this is not SRN I will leave Tameside Highways to comment on the suitability of that increase. It also seems that, despite the overall reduction in traffic, the new distribution shows that more vehicles are likely to head straight on to Manchester Road (+49) rather than southbound from the M67 (-60), which may lead to a slight increase in queueing on the M67 behind the traffic signals. However, as the queueing at this location is already lengthy in the AM peak, National Highways do not believe we could consider the difference to be severe.

Active Travel England

7.20 Comment that Active Travel England (ATE) has no comment to make as its statutory consultee remit applies only to qualifying consultations that were made valid by the local planning authority (LPA) on or after 1st June 2023. They advise that they have produced a standing advice note that may assist the LPA in assessing the application.

Sustrans

7.21 Welcome the opportunity that this could bring to improve the section of National Cycle Network (NCN) Route 62 and the Trans Pennine Trail.

7.22 As noted in the application documents, the section of NCN 62 from the end of Green Lane along the Mottram Old Road was declassified from the National Cycle Network in 2020 as the route was not deemed up to standard due to concerns over safety. As a result, it has left a temporary gap in the network that Sustrans are keen to rectify. Sustrans have begun feasibility work to look at providing a route through Hattersley from the Godley Turntable which would improve the 'missing link' that currently exists.

7.23 In principle, Sustrans support the proposal to create a high-quality active travel corridor through the site that would become the new Trans Pennine Trail NCN 62 route. Sustrans are pleased to see that the path designs mentioned in Section 7.16 of the Design and Access Statement accord with Sustrans, BHS and LTN 1/20 guidance. The document does mention that there may be constraints along the route, therefore Sustrans and the Trans Pennine Trail office would like to be able to see any more detailed design drawings of these sections to ensure that a high quality active travel corridor can be provided throughout the development, which is fully accessible and open to those walking, cycling as well as equestrian users.

7.24 Sustrans would request that a timeline for the installation of this future path is provided. There are eight phases of development associated with the Godley Green proposal, however it

would be beneficial if the Trans Pennine Trail route could be installed in the first phase to ensure that active travel is embedded within the development at an early stage.

- 7.25 Sustrans would request that accesses through the development and the Trans Pennine Trail are fully accessible to all and would appreciate clarification is given over future responsibility of ownership and maintenance of the route.
- 7.26 Sustrans would welcome further discussions with Tameside Metropolitan Borough Council in unison with the Trans Pennine Trail office to ensure that the proposals provide the best possible active travel benefit to the area and to the Trans Pennine Trail/NCN Route 62.

Lead Local Flood Authority

- 7.27 Recommend a conditional approval, following comments taken from the summary:
- 7.28 The site's drainage needs to be approached in a holistic way regarding the detailed design and integration of the blue and green infrastructure. This approach is embedded within the principles contained in "Building for a Healthy Life", published by the Urban Design Group (UDG), and the drainage strategy should be designed in compliance with these principles. The LLFA acknowledges and welcomes the approach adopted to date by the Applicant.
- 7.29 The drainage strategy will need to be developed during detailed design to ensure sufficient consideration of appropriate SuDS and effective surface water management and to evidence a fully integrated approach to SuDS and development planning. This is likely to have implications for SuDS approach, the proposed development flood risk strategy and potentially influence the development layout.
- 7.30 Proposals to reduce current and future levels of flood risk through integrated SuDS across the development area will help provide opportunities to both manage surface water flooding and improve water quality by mitigating the impacts of diffuse pollution. Appropriate SuDS techniques also provide opportunities to enhance local amenity along with wider biodiversity benefits.
- 7.31 Subsequent detailed development proposals should provide opportunity to incorporate effective SuDS approaches that take account of increased runoff from the new development as well as understanding existing limitations, current surface water flow routes and flood risk downstream.
- 7.32 Further design, prior to reserved matters application, will need to demonstrate how the detailed development plans will take SuDS requirements into account and incorporate appropriate measures to:
- Reduce flood risk to the development site associated with surface water runoff.
 - Reduce the off-site surface water flood and pollution impacts from the proposed development.
- 7.33 Options for wider flood risk management may need to be discussed with the Environment Agency (fluvial interactions and Environmental Permits) and United Utilities (detailed foul drainage strategy).
- 7.34 The sequencing for development planning is also key with blue and green infrastructure forming the basis for strategy and design. The potential for beneficial impacts of source control, combined with cascading impacts of SuDS will need to be considered during the detailed design. Effective development planning necessitates that development cannot progress until downstream drainage (including capturing upstream inflows) have been designed and constructed. To prevent an increase in flood risk, a detailed phased

development plan is required. Strategic SuDS elements will need to be formed prior to any residential development. Local SuDS within each development parcel will also need to be quantified and agreed.

7.35 The LLFA will require the following information prior to reserved matters application:

1. A Sustainable Drainage Strategy identifying the type of sustainable drainage systems proposed to control the flow of water/surface water and measures to protect flooding and pollution during construction and operation for the lifetime of the development for each development parcel.
2. The SuDS pro-forma and the evidence required for approval.
3. A comprehensive Surface Water Lifetime Management and Maintenance Plan.
4. Consideration of strategic SuDS elements and detailed development phasing strategy.
5. A Flood Risk Assessment which clearly considers, and quantifies, current day and post development interactions for the lifetime of the development, based on the detailed layout of the development.
6. Detailed investigations into existing culvert condition, capacity, ground infiltration, springs.
7. Blockage, exceedance routes, urban creep and climate change flood mapping to fully define flood risks.
8. Based on existing mapping and access to all land, consideration of wider opportunities for SuDS and existing surface water flow routes.
9. Effective development SuDS criterion to manage development runoff.
10. Demonstration of no downstream detriment – through detailed design, the development should seek opportunities to reduce flood risk to downstream communities.

7.36 Detail and assessment of proposed highway culverts or watercourse crossings including an analysis of the implications for such on associated road and development levels, flood conveyance and design flows. The detailed development layout must be designed to minimise the need for new road or access crossings of watercourses and surface water flow routes. There is a requirement for assessment of any strategic crossings required to access the site and development.

7.37 In accordance with current best practice, appropriate SuDS techniques need to be considered. Opportunities for combined habitat creation, Biodiversity Net Gain and enhanced amenity value need to be demonstrated as part of the water management strategy progressed during detailed design.

7.38 Surface water should be managed through sustainable drainage components with multi-functional benefits as part of an integrated high-quality blue and green environment. Evidence is required for the detailed design to demonstrate that all planned development incorporates SuDS designs to include the following:

- Flood risk reduction
- Management of surface water in stages
- Environmental, water quality and biodiversity benefits.
- Multilevel pollution control,
- Landscape and amenity enhancement.
- Public Health and Safety
- Exceedance flow management.

7.39 The detailed layout of the development should be designed around the SuDS systems and natural flow paths. Designing a layout to fit within existing topography is key to development planning. The LLFA acknowledges the challenging nature of the site but also feels that this affords the Applicant opportunities to incorporate SuDS features into the natural landscape. Attenuation needs to take account of development runoff as well as existing catchment flows with climate change adjustments. This will need to be evidenced through a strategy scale

model with a focus on natural drainage, multifunctional blue and green infrastructure, biodiversity and slow the flow opportunities.

- A detailed engineering feasibility study will be required to identify options that reduce flood risk by attenuating runoff for each development parcel. Potential evidenced options should include On-line ponds or cascading blue and green corridors and Natural Flood Management to attenuate and control runoff.
- Protection and enhancement of areas defined by strategic drainage, flood risk management, public open space, community value, habitat, and ecology areas – blue and green infrastructure.
- Flood risk management measures, including an assessment of green infrastructure or open space that could be used for flood storage should take account of local circumstances.
- The outline design of SuDS in accordance with Defra's Technical Standards.
- Protection of play areas and public open space as these areas are considered integral to design
- Infrastructure designs to adoptable standards including suitable capacity culverts, bridge crossings and flow controls.

7.40 The submitted information contains indicative details on SuDS within the site which according to the information provided would be offered for adoption by United Utilities. It is worth outlining initially that to be adopted by United Utilities, future Applicants/developers must meet the criteria in the Design and Construction Guidance. More details can be found at <https://www.unitedutilities.com/builders-developers/wastewater-services/sustainable-drainage-systems/>

7.41 The submitted drainage details includes elements of storage as part of the SuDS components put forward for adoption. It is worth highlighting that United Utilities have requested that the Applicant must confirm the type of storage with United Utilities as soon as possible as certain elements of storage will not be adopted, e.g. Geocellular Systems. It is worth noting that the shape and design of each storage component needs to meet certain criteria. Some of the storage basins within the design will need further review as part of detailed design. The Applicant must take care during the detailed design of the surface water interaction with highway drainage, as any highway drainage which interacts with SuDS features must have protection measures in place to prevent silt and debris entering the SuDS features.

7.42 The LLFA has not provided comment on the foul drainage proposals for the development. We note there is very limited foul water proposals submitted in the plans. United Utilities will need to provide comment on the adequacy of any foul drainage solution. However, it is anticipated that a detailed assessment of the existing foul systems in the area will need to be undertaken

7.43 Foul drainage proposals are dependent on a pumping strategy, requiring a pumping station(s) even if temporary. The potential impact of flooding of this infrastructure, which is susceptible to water, must be considered and mitigation provided. The Applicant has identified that there is a foul drain located within the site and measures to connect to this will be explored. The LLFA recommends that the detailed design is suitably conditioned with regards to the foul drainage to allow agreement to be reached between the applicant and United Utilities as part of further reserved matters applications.

7.44 During the course of the application the Flood Risk Assessment and indicative drainage strategy have been updated by the Applicant following discussions with consultees including the LLFA. The LLFA considers that the drainage strategy has been adequately explored and agrees that the site can be drained using a variety of sustainable drainage features in accordance with the principles of NPPF guidance on drainage hierarchy. The LLFA is confident that the Applicant will further explore and develop the drainage strategy through

the detailed design phase. Full details of the drainage proposals would be considered and approved through the discharge of conditions process ahead of each phase of development. Subject to the provisions and imposition of conditions, the LLFA believes that the requirements of policy U4 and the NPPF have been adequately addressed.

- 7.45 The LLFA agrees with the approach adopted and assumptions made by the Applicant within their submission. The LLFA recognises that further information is necessary and will be provided as part of the detailed design of the development. The LLFA is comfortable with the information provided to date and in its opinion the drainage proposals are acceptable. The LLFA is supportive of the application, subject to the recommended conditions being imposed.

United Utilities

- 7.46 United Utilities has no objection to the principle of the drainage solution proposed. However, it must be noted that discussions have only taken place regarding the drainage solution for the initial phases. Further assessment and investigation must be undertaken to ensure the proposed solutions for foul and surface water can be delivered not only for the initial phases, but also for the application site in its entirety.
- 7.47 Within the first response, we outlined our expectations in terms of the level of detail required as part of the planning application submission. Although the applicant has provided drainage and phasing information, they have not fully considered how infrastructure will be delivered across the entirety of the application site thereby undermining the objective to ensure a coordinated approach to delivery. This includes further details on a schedule of delivery the indicative foul and surface water drainage proposals for the entire site. As also outlined to the applicant in discussions, there are third party agreements which are required for the discharge of foul and surface water to ensure the site wide drainage solution can be delivered. The applicant has been informed that without investigation into the proposed discharge points for foul and surface water there is potential that the drainage solution cannot be implemented. Further discussions are required with the LLFA regarding the suitability of the existing watercourses within the site as these are a fundamental part of the surface water drainage proposals. The Local Authority will need to be satisfied that these requirements can be met and evidence should be provided to this effect to demonstrate the deliverability of the development.
- 7.48 The submission still lacks full detail on a clear strategy for delivery. Although the submission is in outline the applicant has yet to fully establish the principle of site delivery which does not meet the requirements of the draft site specific policy in the Places for Everyone document (Policy JF31). The applicant has provided information on drainage and phasing proposals, and although the approach has been commended, there are still outstanding details on a clear strategy as per our original response. Therefore, should the application be recommended for approval in its current form, we must recommend conditions are attached to any subsequent approval to secure the necessary information as part of the first reserved matters submission. This is not our preferred approach but is felt necessary should the application be recommended for approval without the applicant providing the additional information as requested in our first response dated 10th February 2022.
- 7.49 To meet the requirements of the recommended conditions, we recommend that the applicant maintains discussions with the LPA, LLFA and United Utilities prior to any detailed design proposals and throughout the design and development process.
- 7.50 We recommend the Lead Local Flood Authority along with any other statutory consultee, including the EA, is also consulted on the proposal.
- 7.51 We have recommended conditions for the management of sustainable drainage systems. Without effective management and maintenance, sustainable drainage systems can fail or

become ineffective. As a provider of wastewater services, 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. We have provided a condition below as a useful example only. The condition is a matter for discussion with the Lead Local Flood Authority.

Environment Agency

- 7.52 Winter 21: This site is known as the proposed Godley Green Village development, and we have been working with the developer and their lead environmental consultant to understand the current and future condition of the land and how this may influence possible risks to the Water Environment.
- 7.53 We have reviewed the relevant chapters of the submitted Environmental Statement; Chapter 9 – Historic Environment, Chapter 10 – Ground conditions, Chapter 11 – Drainage and Flood Risk and Chapter 18 – Waste along with the appropriate appendices.
- 7.54 The National Planning Policy Framework states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from or being adversely affected by unacceptable levels of water pollution.
- 7.55 It further states that local policies and decisions should ensure that new development is appropriate for its location, having regard to the effects of pollution on health or the natural environment, taking account of the potential sensitivity of the area or proposed development to adverse effects from pollution.
- 7.56 Government policy also states that planning policies and decisions should also ensure that adequate site investigation information, prepared by a competent person, is presented.
- 7.57 We note that previous correspondence for our previous engagement has been included in this submission (Ref. ENVPAC/1/GMC/00312 and SO/2021/120861/01-L01 dated April 2021). Our records show that these points and actions remain outstanding and have not been addressed pending additional investigation, sampling, interpolation, and assessment.
- Environment Agency position
- 7.58 I5n response to the July 2023 consultation confirm that the EA have no further comments to those made in our letter dated 21 November 2022 (our ref. SO/2021/121759/02-L01).
- 7.59 Nov 22 - We are aware of the development proposal and have previously recommended advice and guidance to the project team and the local planning authority on this matter. We identified from our review that the eastern sector of the site was predominantly influenced by the presence of a known, formerly licensed, landfilled area. As such we identified that this material was considered to have been subject to landfilling activities and would be a waste if disturbed or excavated.
- 7.60 This would mean a departure from the standard approach to remediating brownfield land and could have additional influences on future permitting and requirement for reuse of materials.
- 7.61 The document demonstrates that it should be possible to manage the risks posed to controlled waters by this development.
- 7.62 Further detailed information 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.

- 7.63 We recommend that focus should be placed on creating a detailed conceptual site model for the water environment so that interactions and interfaces with groundwater and surface from the formerly deposited waste materials were fully identified, understood, and could be robustly assessed.
- 7.64 We suggest that this was a sound way forwards as it would help with future material management plans and possible needs to seek and gain sufficient permitting from the Environment Agency if needed.
- 7.65 Considering 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.
- 7.66 Without these conditions we would object to the proposal in line with paragraph 170 of the National Planning Policy Framework because 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.
- 7.67 Confirmed that owing to the site being located within flood zone 1 any drainage issues should be dealt with via the LLFA.
- 7.68 Recommend 4 conditions and a series of informatives.

Greater Manchester Ecology Unit

- 7.69 No objections raised subject to conditions. Confirm that they have no further detailed comments to make to those issued in November 2022. However, confirm that the Since the submission of the 2022 ES Addendum, the deposit for the District Level Licence for Great Crested Newts has been paid to Natural England, which is the first stage in the implementation of the proposed mitigation strategy for offsetting the impacts on amphibians. It is an acknowledgement that Natural England believe that the development is suitable to be entered into the District Licensing scheme, which will reduce and/or replace the need for on-site mitigation for great crested newts.
- 7.70 The Biodiversity Net Gain (BNG) Assessment has been subject to ongoing adjustments in consultation with GMEU. It has been agreed that the BNG score for the development as measured by a recognised metric will continue to be refined to reflect the most up-to-date and more detailed information available as the development progresses, but the applicant's commitment to achieving a 10% net remains unaffected. GMEU has also been working with the Council to help to progress sites which are able to offer opportunities for off-site habitat creation and enhancement in order to achieve a 10% uplift in biodiversity, should improvements prove not be possible within the application boundary. There is therefore a higher degree of certainty that it would be possible to deliver a 10% net gain in biodiversity locally, should the need for off-setting arise.
- 7.71 November 2022 comments:

Survey Effort

- 7.72 A wide range of ecology surveys have been undertaken to inform the application by suitably qualified consultants, and these are generally to appropriate standards. I would not consider that additional surveys are required prior to deciding the application.
- 7.73 However, this is a very large application covering a large area. Development will inevitably be delivered in a number of Phases over a long time period (probably several years). Since many species are mobile in their habits, and habitats change over time, further surveys may therefore be needed prior to the commencement of any ground clearance and construction

works required for any one phase of development. This requirement particularly applies to badgers, bats and birds.

Designated Sites

- 7.74 The application site is within 6 km of statutorily designated sites of nature conservation importance (Special Areas of Conservation, Special Protection Areas and SSSIs). In particular, it is some 6 km from the South Pennine Moors SAC/SPA, and it is conceivable that new residents of the development could use the Moors for recreation. Some recreational activities can cause harm to the special nature conservation interest of designated sites.
- 7.75 As mitigation for this potential harm, I note that it is proposed to incorporate significant areas of greenspace into the development area, and that at least some of these areas will be publicly accessible. These places will assist in the mitigation of any recreational effects of the development on designated sites, by reducing the need for new residents to travel for outdoor recreation.
- 7.76 Natural England, as the statutory agency concerned with designated national sites, have not raised any issues with the application concerning impacts on these sites. I would defer to the advice of Natural England on this issue.
- 7.77 There are three Local Wildlife Sites (Sites of Biological Importance) within the red line application boundary: Werneth Brook SBI and Brookfold Wood SBI north of the A560 and Back Wood SBI south of the A560. Brookfold Wood SBI and Back Wood SBI are also on the Natural England Ancient Woodland Inventory. The SBIs are primarily designated for their important woodland and grassland habitats and for amphibian populations.
- 7.78 I note that direct losses to SBIs have largely been avoided, and that buffer zones will be able to be established between SBIs and built development. Where minor direct impacts cannot be avoided (e.g. creation of new pathways), details of mitigation and compensation measures will need to be provided at detailed design stages.
- 7.79 I would recommend that any Construction Environment Method Statements (CEMPs) prepared for the development should incorporate measures to protect biodiversity interests during construction periods, including specific measures to be taken to avoid harm to SBIs and ancient woodland.

Habitats

- 7.80 The site supports notable, locally important semi-natural habitats outside of designated areas, including broadleaved woodland, semi-improved grassland, ponds, hedgerows, brooks and streams. The woodland and hedgerow network across the site is particularly notable. These locally important habitats will in turn support a range of wildlife communities that, whilst not nationally rare, will together have valuable local interest.
- 7.81 The areas of semi-improved grasslands are extensive. While some areas of grassland could be considered to be 'recovering', because the grazing and input pressures may have been reduced in recent years, I would not regard the grasslands as currently representing good examples of the priority habitat type Species Rich (Unimproved) Neutral Grassland.
- 7.82 I note that the current masterplan shows that the most valuable habitats on the site have been avoided. Enhancements of retained habitats through long-term management will be possible, although the development is considered unlikely to achieve a net gain in biodiversity within the application boundary (see comments below). To ensure the retention of notable habitats on the site wherever possible, and to ensure the management of new landscaping for wildlife, I would recommend that a comprehensive, holistic Landscape and Habitat Creation and Management Plan should be prepared for the whole site as a condition of any approval.

Protected and priority species

- 7.83 The application site supports the following protected and priority species –
- Great crested newts
 - Badgers
 - Foraging and roosting bats
 - Nesting birds
 - Barn Owls

Great crested newts

- 7.84 The Environmental Statement states that the development will be entered into the District Level Licensing (DLL) scheme for great crested newts, and I understand that Natural England are currently considering the scheme as likely suitable for DLL (*personal communication*). This will mitigate the need for further surveys for great crested newts and for provision of new habitats for newts within the site boundary. But I could not find evidence within the application documentation that the development has been finally accepted into the DLL scheme by Natural England. Evidence would take the form of an official certificate granted by NE. The certificate should be obtained, and presented to the local planning authority, as evidence that the development has been accepted into the DLL scheme, if the applicant wishes to pursue this option.
- 7.85 In the absence of DLL, I would accept that, given the small-medium population of gcn involved, it would be possible to mitigate for harm to gcn on-site. However, I would advise that if this 'traditional' approach is to be taken to the conservation of great crested newts, a comprehensive mitigation strategy must be prepared and, once agreed, implemented in full. This strategy could be required by Condition.

Badgers

- 7.86 Current plans for the development indicate that several outlier badger setts will need to be closed to facilitate the development. The site supports different badger clans, and the development may fragment and sever Badger territories. Although badgers are not rare or endangered, their welfare is specially protected under the terms of the Protection of Badgers Act 1992. Harm to badgers and their setts is an offence and should be avoided wherever possible. Under the terms of the Act, any sett closures will require a separate License to be obtained from Natural England. Given the size of the application site, and the proposed retention of areas of woodland and other greenspace, I would consider that it would be possible to permit the development without causing long-term harm and losses to local badger populations, but further precautions as regards badgers are justified.
- 7.87 I would recommend that a comprehensive Method Statement is prepared giving full details of measures to be taken to avoid, mitigate and compensate for possible harm to badgers as a result of the scheme. I would advise that the Method Statement should include details of long-term (at least 5 years) monitoring of badger road casualties on nearby roads to identify any patterns which could emerge if badgers are displaced from their current territories. This would enable mitigation measures to be taken to avoid future casualties (e.g. fencing). The Method Statement must be required by Condition.

Bats

- 7.88 While it is considered unlikely that any bat roosts will be directly lost to the development, the development may result in direct and indirect losses to bat foraging habitat, which may affect the local conservation status of bats. I note that the wildlife movement corridors will be retained as part of the development and that important bat foraging habitats will be retained, but I would also recommend:
- Further detailed landscape management plans for each phase of the development should be submitted to and approved in writing by the local planning authority prior to

the occupation of the first dwellings within each phase of the development. The landscape plans should consider the provision of wildlife corridors through the site.

- New bat roosting opportunities (bat boxes, bat bricks *etc*) should be introduced into the detailed designs of the development
- Sensitive lighting plans should be developed, avoiding or reducing lighting of useful bat feeding habitats

Barn Owls

- 7.89 Barn Owls have been confirmed as likely breeding on the site. Barn owls are specially protected under Schedule 1 of the Wildlife and Countryside Act 1981 (as amended). Given that Barn owls prefer to forage over large areas of open farmland, it would be best to compensate for losses to barn owl breeding sites and foraging habitat off-site. It is understood that nearby land at Werneth Low is under consideration for provision of off-site habitat creation and repair. I would recommend that new barn owl nesting boxes are installed on land at Werneth low as part of these habitat enhancement proposals.

Nesting Birds

- 7.90 To avoid harm to nesting birds in general –
- Vegetation clearance should be carried out outside of the optimum time of year for bird nesting (March to August inclusive).
 - New nesting provision for birds should be provided, *e.g.* new nest boxes. In particular, consideration should be given to providing new nesting places for Swifts.

The Impact of the Development and Mitigation and Compensation for Impacts

- 7.91 Although at the moment the application is in Outline and final layouts are yet to be decided, it does appear likely that the development will result in losses to locally important habitats, including woodlands, open grassland, hedgerows and ponds. Fragmentation and disturbance to retained habitats are inevitable. Built development will lead to a loss of open-ness and the loss of the current rural character of the site.
- 7.92 However, significant mitigation and compensation measures for harm to habitats and species have been put forward as part of the Outline application, including –
- The retention, protection and management of woodlands, including Ancient Woodland and Sites of Biological Importance
 - The establishment of landscape buffer zones around important habitat areas
 - The creation of off-site ecological enhancement areas, both on land to the north and to the south of Mottram Old Road
 - Efforts to retain landscape connectivity
- 7.93 Because this development is very large and will likely be delivered in phases over a number of years, it is important to establish a coherent, holistic Landscape Framework at this stage, so that local ecological connectivity is maintained over time, and so that the form and type of new planting is standardised across different development platforms and phases. As each phase of the development is brought forward, it should be required to contribute to an overall Landscape Plan.

Biodiversity Net Gain

- 7.94 The NPPF, and emerging statute and local policy, strongly encourage new developments to achieve a net gain in biodiversity. A commitment is made in the ES that this development aims to achieve a gain of at least 10%, as measured using an accepted Biodiversity Metric, and this commitment is welcomed. At this outline application stage, it is not possible to calculate detailed biodiversity metrics. However, draft metrics indicate that it will not be possible to achieve biodiversity net gain within the application site, and that off-site habitat creation and repair will be needed. As yet, no sites to accommodate necessary biodiversity

enhancements have been finally confirmed. But a 'Biodiversity Net Gain Feasibility Report' has been provided to inform the application, and this Report provides a high level of confidence that off-site Biodiversity Net Gain will be able to be delivered.

7.95 *Recommendations*

- BNG Design Stage Reports should be required to be provided as part of the subsequent Reserved Matters Application(s) for each development Parcel or Phase. These reports will require new BNG metric calculations, once detailed layouts and landscape proposals are available. In the absence of detailed off-site habitat creation proposals, the Council may wish to consider requesting a general financial contribution to be made towards off-site biodiversity compensation.

7.96 *Additional Recommendations*

- A comprehensive, holistic Landscape and Habitat Creation and Management Plan should be prepared for the whole site
- It would be useful for an overall Ecological Clerk of Works to be appointed to oversee development phases, to ensure that nature conservation interests are protected at all development stages
- A legal agreement will likely need to be prepared to require a contribution to be made towards off-site habitat creation, repair, enhancement and management in order to ensure that commitments to biodiversity net gain can be met.
- A method statement should be required to be prepared giving details of measures to be taken to prevent the spread of invasive plant species during the course of works
- A comprehensive Construction Environmental Method Statement should be required to be prepared, including details of how harm to nature conservation assets is to be avoided during the course of ground clearance and construction works.

Conclusions

7.97 The development proposals will have significant effects on designated nature conservation sites, on semi-natural habitats and on protected and priority species.

7.98 Substantive avoidance, mitigation and compensation measures have been proposed as part of the application, including the management of areas which will be enhanced for nature conservation. In addition, meaningful amounts of open greenspace, and improved greenspace, will be provided as an integral part of the overall development. Off-site habitat compensation is also put forward as an option for achieving a net gain in biodiversity.

7.99 I would therefore conclude that it would be possible to allow the development without causing levels of unacceptable harm to nature conservation interests.

7.100 However, updated ecology surveys and further details of mitigation and biodiversity enhancement will be required to inform subsequent, detailed Reserved Matters applications.

Further comments

7.101 The GMEU were reconsulted following the receipt of an Environmental Statement Addendum and associated appendices on 20th July 2023. As a result of this new information additional comments were provided and have been presented below.

7.102 There do not appear to have been any substantive changes to the proposed development that have significantly affected the assessment of effects upon ecology since the submission of the 2022 ES Addendum, which I responded to on the 22nd November 2022. I therefore

have no further detailed comments to make on the application in addition to the comments made in November 2022.

- 7.103 No additional ecological survey information appears to have been gathered since 2022. It is noted that because this development has very long time frames and the site is likely to be developed in phases, further surveys are expected to take place throughout the development process to maintain an ongoing working knowledge of the ecological conditions and to inform the detailed design process for each phase.
- 7.104 Since the submission of the 2022 ES Addendum, the deposit for the District Level Licence for Great Crested Newts has been paid to Natural England, which is the first stage in the implementation of the proposed mitigation strategy for offsetting the impacts on amphibians. It is an acknowledgement that Natural England believe that the development is suitable to be entered into the District Licensing scheme, which will reduce and/or replace the need for on-site mitigation for great crested newts.
- 7.105 The Biodiversity Net Gain (BNG) Assessment has been subject to ongoing adjustments in consultation with GMEU. It has been agreed that the BNG score for the development as measured by a recognised metric will continue to be refined to reflect the most up-to-date and more detailed information available as the development progresses, but the applicant's commitment to achieving a 10% net remains unaffected. GMEU has also been working with the Council to help to progress sites which are able to offer opportunities for off-site habitat creation and enhancement in order to achieve a 10% uplift in biodiversity, should improvements prove not be possible within the application boundary. There is therefore a higher degree of certainty that it would be possible to deliver a 10% net gain in biodiversity locally, should the need for off-setting arise.

Natural England

- 7.106 Consider that the proposed development will not have a significant adverse impact on statutorily protected nature conservation sites. Advise on the use of informatives should planning permission be granted.

Tree Officer

- 7.107 The known detailed elements of the proposed outline plans indicate the removal of a limited number of trees. These include one tree classed as category B, one category B group, two category C groups and 143m of hedgerow. The majority of trees, woodland and hedgerow are to be retained, including all high value category A trees and groups, ancient woodland and a large proportion of category B trees.
- 7.108 The current Arboricultural Impact Assessment is adequate for the outline application. However, any full application should require detailed Arboricultural Impact Assessments and Arboricultural Method Statements for the entire site and for all phases of construction, including any deviations from approved plans. These should be based on the detailed plans when submitted. They should include tree protection measures for all retained trees and instructions on how all aspects of construction can be undertaken with no detrimental impacts on the trees or further tree removal.
- 7.109 An addendum to the Arboricultural Impact Assessment has now been submitted covering the area south of Mottram Old Road. This details the various tree retention categories according to BS5837 and is adequate for the current application. Any detailed plans for this area should have a presumption that all higher value trees will be retained.
- 7.110 The design should incorporate a reasonable 'buffer' zone between the retained trees and woodland, particularly significant trees and ancient woodland, and the new development. This will reduce the potential for future conflicts, or requests for inappropriate tree management. The current proposal for a 15m minimum buffer zone to woodland should be

considered inadequate, as this is based on root protection alone. The minimum buffer zone should be at least 30m to control other adverse effects on existing woodland.

- 7.111 In terms of mitigating soft landscape and planting a full application should include a detailed scheme of new individual trees, tree groups and hedgerows. The new planting should be extensive and go beyond a simple replacement for losses. There should be significant new highway / verge tree planting utilising high specification shared trench pits of large volume rather than individual trees pits and incorporating sustainable drainage systems to supply irrigation where possible.
- 7.112 The current outline plans are broadly acceptable from an Arboricultural perspective, as the proposed negative impacts on trees and woodlands is considered minimal. However the detailed plans and assessments should reflect this presumption that all the trees and woodlands are valuable amenity assets and should be incorporated into the scheme with no detrimental effects.

Woodland Trust

- 7.113 Objection to the application on the basis of indirect impact to ancient woodland (Brookfold Wood). Advise that the applicant should seek to provide a buffer zone of 100 metres to Brookfold wood to ensure that it will be adequately protected.
- 7.114 December 2022 - While we welcome the increase in the buffer zone provided, given the scale of the development proposed we will be maintaining our position with respect to Brookfold Wood. However, if the Local Authority is minded to grant permission, we would like to reiterate the following recommendations are considered and taken forward:
- Implementation of a suitable buffer zone to Brookfold Wood. We note that the applicant will be working closer to the ancient woodland edge in some areas compared to others, however, we maintain our position that the size and scale of the development warrants a 100m buffer between any development and ancient woodland.
 - Retaining and enhancing natural habitats around ancient woodland to improve connectivity with the surrounding landscape, with the need to ensure these are designed accordingly with other management and access plans related to the ancient woodland.
 - The applicant should work with the local woodland owner (if applicable) to produce a woodland management plan. For example, looking at woodland restoration if the site requires it. Any neglected woods or trees should be considered for sympathetic management to better their standing and ecological value.
 - This should also include producing and funding an access management plan for the woodland to ensure that harm from recreational use is avoided, as well as ensuring the provision of suitable alternative natural greenspace to reduce additional visitor pressure and redirect people and pets. If ingress into the woodland from residents is anticipated then consideration of a footpath may be required to avoid informal accesses being created through areas that may contain sensitive species.
 - Measures to control noise, dust and other forms of water and airborne pollution, as well as sympathetic design and use of appropriate lighting to avoid light pollution.
 - Drainage management plan/strategy to ensure that the development would not adversely affect the hydrological condition of the ancient woodland.
 - Implementation of an appropriate monitoring plan to ensure that proposed measures are effective over the long term and accompanied by contingencies should any conservation objectives not be met.
- 7.115 February 2022 - Objection to the application on the basis of indirect impact to ancient woodland (Brookfold Wood). Advise that the applicant should seek to provide a buffer zone of 100 metres to Brookfold wood to ensure that it will be adequately protected.

TMBC Greenspace Manager

- 7.116 No objections, welcome the provision of open space across the site. Summary of comments is as follows:
- 7.117 The inclusion of trees within the highway, new parks and smaller greenspaces is welcomed. Advise planting needs to be creative with species choice to enhance the character of each space and provide a sense of place. In terms of existing woodland comment that significant capital investment will be required to fund safety and management work.
- 7.118 Biodiversity – The Council has sites which could be enhanced as part of the overall BNG strategy. There is a diverse range of habitats across the site and this is welcomed – however these will require a diverse range of specialist maintenance. There will need to be specific contracts in place to carry out this maintenance and it needs substantial funding as some can be labour intensive. Volunteers could get involved in the maintenance of some of the sites however there would need to be a base for the volunteers, full funding of necessary tools and equipment, vehicles and training as well as funding Officers to organise and supervise the volunteers.
- 7.119 Watercourses – Would like to explore opportunities to increase ponds if a comprehensive SUDS scheme is in place. All the watercourses have the potential to be attractive places for residents and visitors to spend time and enjoy if they are properly managed and maintained. A small pond can really enhance a green space – as well as the aesthetics they will encourage native flora and fauna which all adds interest to people visiting the greenspace. The watercourses on site will all need appropriate management and maintenance contracts in place to ensure that they are managed safely.
- 7.120 Formal Green Space - The spaces need to be diverse – places where people can sit and relax in a more peaceful setting as well as spaces which lend themselves to ball games, picnics and appeal to families and groups. There is opportunity when creating new greenspaces to include planting which is unusual and not something that people can see in their gardens. The planting needs to be designed with future climate change in mind. Careful consideration is needed for when the greenspaces are built and how this ties in with the phases of development – ideally the greenspace needs to be built at the same time as, if not before, the housing. Management and maintenance of the greenspaces will be critical to their ongoing success so needs careful thought.
- 7.121 Playgrounds - The locations of the playgrounds are acceptable but we would like to see some play equipment in the village centres – these will be well used places and good play provision could increase dwell time which will benefit local businesses. The playgrounds must provide a diverse and inclusive range of play equipment and this should be possible with the number of playgrounds across site.
- 7.122 Playgrounds can be a big liability so the stewardship model for the site needs to include details on how playgrounds will be inspected, repaired and maintained. Depending on the type of play equipment included some play equipment may need replacing frequently and there must be adequate funding available for this. The design and composition of the play areas need to be provided for detailed comments.
- 7.123 Outdoor gyms / trim trails need to be managed and maintained in the same way as play areas and depending on the type used can need even more maintenance due to the number of moving parts.
- 7.124 Active travel - It is really positive to see the emphasis on active travel across the development. There seems to be adequate provision for walkers and cyclists however there needs to be detailed plans for the provision of equestrian routes across the site. The area is frequently used for horse riding and as well as the bridleways there are horse riding tracks through Werneth Low – a plan needs to be produced demonstrating the equestrian routes in future

applications. There needs to be a coherent signage strategy for the site so that people can easily find their way and so they can be signposted to other locations and attractions. A signage strategy should be included for the whole site when full planning applications are submitted.

- 7.125 Allotments - The Council has a long waiting list for allotments so there is demand however they can be challenging to run. The allotments could be used as a way of creating a community and there needs to be consideration given to how they are run to maximise the opportunities for the whole community to get involved in growing.
- 7.126 Maintenance - We cannot provide detailed comments on maintenance of the grass, trees, woodlands, green infrastructure site until the stewardship model has been confirmed. We welcome the thought that has gone into the Stewardship Technical Briefing Note and can provide advice to the applicant as the plans progress. There is a wide variety of assets so one team will not be able to maintain all elements – there will need to be specialist contractors brought in for elements such as woodland management, playground inspections, maintenance of water courses and habitats. There is no indication of a maintenance depot within the site – this seems an omission unless it is expected that all contractors are only visiting the site on an occasional basis. If this is the expectation it may lead to issues with a lack of ownership of the area.
- 7.127 Phasing - The phasing of housing alongside green infrastructure is critical and needs to be developed alongside the Stewardship model.
- 7.128 Developer Contributions - Sites such as Werneth Low and Great Wood will see an increase in visitor numbers and this will have an adverse impact unless there is suitable mitigation through contributions from the developers.

Sport England

- 7.129 Confirm that they generally support the recommendations in the Sport Facilities Guidance Pre Position Statement Report' prepared by KKP. Note that this will be dependent on the outcome of the Tameside Playing Pitch and Outdoor Sport Strategy (PPOSS) There are also some discrepancies between the Pre Position Statement and the PPOSS which would need to be rectified by updating the Sports Provision Statement.
- 7.130 Sport England consider there is a requirement for a Sports Strategy to be developed that can be secured via condition.
- 7.131 The Sports Strategy should build on and update the evidence contained in the Pre Position Statement, and provide clarity around:
- the quantum and location of pitches/ancillary facilities required. Options include Multi sport hub site/co-location with the new school and Alder Community High School. As a note Sport England do not support single/double pitch sites dispersed around housing sites. They are unsustainable and do not actively contribute to the supply of pitches, often becoming informal kick about areas.
 - an analysis of the additional demand for indoor sport and recommendations as to whether the additional demand:
 - can be accommodated in existing indoor facilities (i.e. those sports facilities have sufficient spare capacity)
 - improvements to existing sports facilities are required to accommodate the additional demand; or
 - new provision is required
 - Management and maintenance arrangements of the sports facilities to ensure long term sustainable sports facilities for the local community

Trans Pennine Trail

- 7.132 August 2023: The Trans Pennine Trail (TPT) partnership and Sustrans welcomes the opportunity to comment this latest application in relation to Godley Green. It is noted that there is an improvement of the sustainable transport offer of the development and both organisations acknowledge the work done by the developer to provide this. However, concern remains as to the delivery date of the realignment for the TPT/NCN and concern that a full active travel route will not be delivered until the penultimate phase of development is completed. This is not delivering on an active travel agenda with an ethos of a development promoting low-car use from the outset.
- 7.133 Clarity is sought re Brookfold Lane and Green Lane. It should be evidenced that there is still a commitment from Tameside and the Developer to look at better connections to the Trail to the east of the site (Natural Open Space area).
- 7.134 Brookfold Lane and Green Lane – assurance sought that these will both be a minimum of 3m wide footways and cater for cyclists and pedestrians. In turn the connection to the west at Mottram Old Road should also cater for cyclists, not just pedestrians (see note below). Are both roads provided to LTN1/20 standard?
- 7.135 Since the first application response, the TPT has welcomed further discussion with the developer and Sustrans to source the best alignment for the TPT / NCN within the development area. It is noted the original application included a primary school but the revised application states secondary school. Equestrian provision has now also been accommodated for in terms of the TPT / NCN. Some of the illustrations need to clearly indicate multi-user connection. It is noted that the bridge link to Hattersley Station will accommodate walkers and cyclists.
- 7.136 The TPT requests that a timeline for building the TPT/NCN within the development is provided and assurance given that the route will be delivered early within the development programme. Assurance should also be given to provide information for the continuation of the TPT / NCN through to Broadbottom, as part of the development of the secondary site. This information has not yet been provided.
- 7.137 It is important that the new TPT / NCN alignment is delivered early within the development programme and confirmation of the continuation of the route to Broadbottom is provided. Once the development starts the extra traffic, including HGV's, will add to the unsafe environment of the A560 for sustainable transport users. It is also recognised that Sustrans have undertaken initial feasibility work to provide an interim route for TPT users along Underwood Road.
- 7.138 As noted in earlier responses, this proposal will ensure a safe route can be provided during the construction of the Godley Garden Village proposal. However, it is not the intention for this to be the permanent alignment of the TPT / NCN but early construction will provide a safe route during development of this site. The developer should also provide information regarding the continuation of the TPT / NCN through the second development area. This has not yet been discussed or details presented.

Contaminated Land

- 7.139 Comment that the contaminated land reports are exploratory in nature and the aim would appear to be to determine that development is possible at the site when considering potential contamination issues rather than it being a detailed contamination appraisal.
- 7.140 In relation to soils, the information provided appears satisfactory to confirm that remedial measures can be implemented to mitigate soil contamination. In relation to ground gas, there is sufficient information to demonstrate that concentrations do not preclude development for the eastern and southern sectors. However, only limited ground gas monitoring has been undertaken in the central and western area and none from the three landfills located in this sector. Consequently, the applicant produced a Ground Gas Addendum report based on the ground investigation information available and the materials used to infill the small landfill

split into three sections in this part of the site. From this additional risk assessment, the applicant has concluded that the potential contamination issues and ground gas regime would not prevent development in this area. In addition, they advised that remedial works could be undertaken that would enable construction works in these areas.

- 7.141 Based on the information provided, we have no objection to the development proposal from a contaminated land perspective. However, when considering the exploratory nature of the ground investigations undertaken, the lack of investigation/monitoring in some areas and the potential contamination issues detailed, conditions are recommended relevant to further site investigations prior to commencement of development.

Coal Authority

- 7.142 It is only the extreme south / south western part of the site that marginally intersects the Development High Risk Area and therefore the Coal Authority raised no objections to this application in our previous letter to you dated 13 December 2021 and reiterated these comments on our letter dated 15th November 2023.
- 7.143 Confirm that the Planning team at the Coal Authority have no further comments to make on this application as the site proposed for development falls outside of the defined Development High Risk Area.

GM Minerals Team

- 7.144 We have reviewed the information online in relation to the above application and have no comments in respect of the Minerals Assessment which clearly sets out the development in relation to Policy 8 of the Greater Manchester Joint Minerals Plan. We would direct you to advice from the Coal Authority in relation to previous workings for coal, and the Environment Agency and your Contaminated Land specialists, for guidance on the requirements relating to the historic landfill.
- 7.145 The proposed site is within Mineral Safeguarding Areas (MSA) for Brick Clay, Sand and Gravel, Coal and Sandstone; therefore, the proposal must be in compliance with Policy 8 (Prior Extraction of Minerals) of the Greater Manchester Minerals Plan Development Plan Document (2013). It is acknowledged that further site investigation will be necessary to determine the full extent of minerals reserve on site.
- 7.146 The latest LAA published in 2019 using data for the period 1st Jan 2018 to 31st Dec 2018 indicates that the land bank for sand and gravel is estimated to have fallen below 7 years for the third year in succession, with a total reserve of 1.2 million tonnes, representing 4.4 years of sales based on the average sales over the most recent 10 year period. The North.
- 7.147 West Aggregate Working Party have also produced an updated report in 2019 quoting these figures to highlight the importance of safeguarding this resource. More detailed figures on the potential volume of sand and gravel extraction across the central and eastern parts of the site as described, would therefore be helpful to provide more robust analysis of economic viability. Further site investigation will support this process to clarify the conditions in the eastern sector of the site.
- 7.148 Given that the area to the south of Mottram Road is considered more economically viable for mineral extraction, the proposed development should provide a suitable buffer to ensure that there are no constraints to access or restrictions that could impact full maximisation of viable areas of extraction.

Environment Health Officer – Air Quality

- 7.149 Air Quality:- Chapter 13 of the Environmental Statement and the subsequent Environmental Statement Addendum assesses the effects of the proposed development on air quality. In particular it considers the potential effects of construction phase dust and operational phase road traffic emissions on air quality at existing receptor locations, as well as the potential exposure of future residents to existing air quality issues.

7.150 We can confirm that the methodology used in the air quality impact assessment is acceptable and conforms to current guidance issued by the Institute of Air Quality Management (IAQM) and the Department for Environment, Food and Rural Affairs (DEFRA).

7.151 The background concentrations used in both the assessment of the impacts of traffic and the potential impacts of fugitive dust released during the construction phase of the development are correctly sourced from the DEFRA Local Air Quality Management website and the Council's own published air quality monitoring data.

Potential Impact of Dust from Fugitive Emissions.

7.152 The assessment has been undertaken in accordance with the methodology outlined within the Institute of Air Quality Management document 'Guidance on the Assessment of Dust from Demolition and Construction V1.1'. The report concludes that without any mitigation measures in place, a major adverse impact from fugitive dust on neighboring properties during the construction phase, earthworks phase and from vehicle track out could occur, along with a moderate adverse impact on human health from vehicle track out.

7.153 The report does not consider that the development is expected to take many years to complete and the effect this may have on some residents. Although the point sources for releases of fugitive emissions will move through the different phases of the development, residents in close proximity to the access points for the site maybe more sensitive to ongoing issues of dust being released through track out over such an extended time period and consideration to this could be explored in more detail.

7.154 The report advises that the use of appropriate mitigation measures, as detailed in the IAQM guidance on the assessment of dust from demolition and construction, in the form of a construction environment management plan, will effectively control the release of fugitive dust emissions during all phases of the development. These mitigation measures are appropriate and will need to be put into a suitably worded condition, should the application be approved. We also recommend that given the extended time frame for the development to be completed that a review of this plan, including any recommendations for changes in order to take in to account any updates on construction methods, machinery type, complaints from residents etc. is undertaken annually and any changes to mitigation measures be submitted to the LPA in writing for approval.

Impact of Vehicle Emissions During the Operational Phase

7.155 The impact of vehicle emissions during the operational phase have been assessed in accordance with the Institute of Air Quality Management guidance "Land Use Planning and Development Control: Planning for Air Quality.

7.156 Any new development that leads to an increase in vehicle movements will have an adverse impact on air quality. The report sets out to determine the significance of this impact and if it could lead to any potential breaches of the air quality objectives for nitrogen dioxide and particulate matter PM₁₀.

7.157 Dispersion modelling was undertaken using the ADMS-Roads dispersion model (version 5.0.1.3). ADMS-Roads is developed by CERC and is routinely used throughout the world for the prediction of pollutant dispersion from road sources. The model was appropriately verified using traffic data, meteorological data and monitoring results from 2019. The choice of 2019 as the verification year aligns with current guidance, taking into account any variation in traffic flows that were seen during 2020 and 2021 as a result of the pandemic.

7.158 Concentrations of nitrogen dioxide and particulate matter (PM₁₀) where modelled across the site and on the local highway network and at 38 sensitive receptor points.

7.159 The results of the dispersion modelling assessment indicate that the impact of annual mean nitrogen dioxide concentrations were predicted to be slight at one receptor and negligible at the remaining receptor locations. Particulate concentration impacts were negligible at all sensitive receptor locations as result of the revised traffic flow predictions for the development. Residual air quality effects are therefore predicted to be “not significant”. The results of the dispersion modelling assessment also indicated that predicted annual mean nitrogen dioxide and particulate concentrations were below the relevant Air Quality Objectives across the site. The report concluded that no further mitigation was required other than those already embedded within the development proposal i.e;

“Several features have been included in the proposed development that will provide mitigation against air quality impacts during the operational phase. These include provision of an Electric Vehicle (EV) charging point at each residential property with a parking space, as well as high quality walking and cycling infrastructure. These measures are anticipated to promote the use of sustainable modes of transport and reduce road traffic exhaust emission impacts. The location of the proposed development also promotes sustainable travel due to the accessibility of bus and train services, as well as pedestrian and cycle connections. Local amenities including health centres, education facilities and small retail stores are proposed on site to minimise the need for trips using private vehicles”.

Conclusion

7.160 Based on the information provided, we have no objection to the development proposal from an air quality perspective. We recommend that a condition requiring the submission of a construction environment management plan for the control of fugitive dust emissions during the demolition, earthworks and construction phases and from vehicle track out be submitted in writing to the LPA for approval prior to commencement of development and that this plan is reviewed annually and any changes to required mitigation be submitted in writing for approval of the LPA prior to their introduction.

Environmental Health Officer - Noise

7.161 The assessments referred to in this chapter have been undertaken in accordance with the relevant standards and guidance.

Construction Noise & Vibration

7.162 Construction noise and vibration has been assessed in relation to existing, on-site, sensitive receptors to predict the impact the development would have on these receptors. While noise and vibration is inevitable, it will be temporary in nature and, while it is predicted that the impact will not be significant to some existing receptors, it identified dwellings where mitigation measures will be required during the construction phase.

7.163 Such mitigation measures will be based on the adoption of the Best Practicable Means criteria listed in the Control of Pollution Act 1974. Such measures should be included in the Construction\ Environmental Management Plan and agreed with, in writing, by the Local Planning Authority.

Road, Rail, Commercial & Sport Pitch Noise Impact

7.164 A noise impact assessment was undertaken to determine the impact of road traffic noise, including from predicted traffic flows once the development has been completed. While the majority of the site will not be impacted by road traffic noise, those dwellings that will be situated close to Mottram Old Road will require some mitigation measures to ensure compliance with the relevant British Standard. Such measures include acoustic glazing, acoustic ventilation, in the form of whole house ventilation, and acoustic fencing around outside areas.

7.165 The assessment concluded that dwellings close to the railway line are unlikely to require mitigation measures.

- 7.166 Also, the assessment has concluded that the proposed sports pitches will not have an adverse impact on existing and future receptors. However, from experience, consideration needs to be given to the given to the actual, real, noise impact from users of such sports pitches. This Department does receive complaints of noise from loud shouting and bad language from users of such pitches and consideration should be given to the design of such pitches and whether to include some form of barrier to mitigate against such issues.
- 7.167 It has also been predicted that noise from commercial premises is unlikely to have an adverse impact on future receptors. However, at this stage, it is not known what commercial premises are to be included in the development hence the condition requiring design details of any proposed plant and machinery.
- 7.168 However, the above assessment was undertaken during July 2020 which coincided with the initial ease of Covid 19 restrictions when traffic flows will not have returned to pre-pandemic levels. Therefore, the noise impact assessment will require updating to take in to account current road and rail traffic levels, hence the recommendation to include a condition requiring such an assessment. The assessment should include specific details of the mitigation measures required

Police (Secure by Design)

- 7.169 Greater Manchester Police can confirm that due to the size and nature of this proposal we would recommend that a full Crime Impact Statement (CIS) report should be submitted, in order to show how crime has been considered for the proposal and the surrounding area. The report should be completed by a suitably qualified security assessor, and identify, predict, evaluate and mitigate the site-specific crime and disorder effects of a development and should be produced by a professional individual/organisation independent of the design process. The CIS can then be submitted as part of the planning application, indicating that the proposed development has been designed to avoid/reduce the adverse effects of crime and disorder and enabling the planning process to run more smoothly.

TMBC Housing Strategy

- 7.170 The level of affordable housing provision has been set in accordance with Councils Executive Cabinets requirements for all new developments as Tameside council does not currently have an adopted policy regarding the provision of affordable housing. As such, 15% of all homes on the site will meet the definition of affordable housing in the NPPF. Based on a 2,150 unit scheme, Godley Green will deliver 323 affordable homes via planning obligations with the split of tenure suggested at 60% Social Rent and 40% affordable home ownership, with types and tenures to be approved by the Council. Any affordable homes not delivered via planning obligations will be additional to the 323. As the scheme will be delivered over a 15-year period based on strong place-making principles, property values within the scheme may perform better than expected. If so, there would be the opportunity for a higher quantum affordable housing to be delivered on site via planning obligations. This could equate to a total provision of 30% affordable housing or 645 units.

TMBC Public Health

- 7.171 The Strategic Design Code makes some good reference to the planning of local infrastructure such as healthcare facilities which may be required in the immediate area as part of future developments. Some wider consideration should be given to the impact on health and social care service capacity impacts in the wider surrounding area, including across the entire borough for more specialist services. Further discussions should be held with the appropriate local authority and healthcare commissioners (NHS GM Integrated Care Board) to ensure that service planning adequately meets any increased demand.
- 7.172 NHS England has set out guidance which outlines some of the priority areas from a health perspective which should be considered when planning new developments and new places – in the context of the guidance this was around ‘new towns’. Putting Health into Place.

(england.nhs.uk). This sets out a number of key points which should be considered for the proposed Godley Green development: integrated health services which meet local needs (can developers commit some of the community space for these purposes for free/subsidised?); involve people and communities (is there work that developers can commission or enable to support this happening – maybe some support for voluntary organisations to establish in the area with subsidised travel / active travel / premises? – supporting these small community organisations to establish a base and then coordinate community involvement in the area etc); maximising active travel; inspire and enable healthy eating (supplementary planning approach or added support for food outlets which are not A5 – hot food takeaways); enable healthy play and leisure; provide health services that help people stay well; and create integrated health centres. The final point in this guidance would be particularly suited to some of the health challenges which can be addressed by having more shared 'one-stop' service centres, or 'hubs'. There is already an active collaborative team established in the wider Hyde area as part of the Primary Care Network for Hyde, but this should continue to be built on with developers making relationships with the PCN and exploring opportunities to deliver healthcare needs in the area in an integrated way – one example of this would be a community facility/building, which could house multi-purpose service centres and providers such as a GP practice, social care neighbourhood teams, community mental health teams, and other specialist services including substance misuse, sexual health, early help and other teams. Potentially this could be offered free/subsidised to demonstrate social value investment.

- 7.173 Another particular priority in the immediate area and across the whole borough is obesity and enabling healthy weight. It is important to consider active travel, movement, access and open spaces for recreation, which have been addressed in the separate population health consultation response. There are other aspects including improving the food environment for both consumption and production of healthier food option (potentially achievable via supplementary planning documents or a developer focus on suitable retail outlets); ensuring adequate space available in the public realm for community facilities which can run health promoting programmes such as weight reduction / NHS Health Checks / Smoking Cessation; ensure high quality building design; supporting people into local employment; also supporting space for community food growing projects (again, this could be funded/subsidised by developers to demonstrate social value, and would combine well with support for voluntary and community sector organisations who could have a base in the area and coordinate activities around these spaces. Provision of high quality community facilities/spaces will be supportive of a number of health promoting initiatives in the area including outreach and targeted work which the Primary Care Network lead on to support some of the most vulnerable members of the community. This type of space available will also enable potentially low-cost or subsidised access to space for voluntary and third sector organisations including the large number of micro-organisations in the Hyde and wider Tameside area, which provide a wide range of health promoting activities. Examples may include food banks and pantries, weight loss programmes, befriending services, mental health support, specialist support for older people, child and baby groups. It would also be health promoting to have spaces which attract and encourage young people to use them. These spaces could also link in to relevant specialist services such as sexual health services, which are commissioned by public health – providers of this service in Tameside (Locala CIC) would be keen to engage with developers to look at mutual ways to engage with young people to bring them in to these spaces to spend time / leisure / seek information & support.
- 7.174 The Local Authority has also recently been successful in a bid for national funding for 'family hubs'. This is a new model which gives local areas some resource to develop a core offer for families and young children around a shared physical space such as a hub or community use building. This will have core offers for families around parent/infant mental health, breastfeeding peer support, and parenting skills. New community facilities and buildings in the Godley Green area potentially present an opportunity to further develop this model in this local area once it is established during 2023 and beyond.

- 7.175 Due to the relatively high degree of health inequity and inequalities that people in Tameside and parts of the neighbouring Hyde area experience, there should be a consideration for how the future development will provide spaces and services which attempt to address the additional barriers some groups in our communities' face. This will include some of the more direct 'health-related' aspects including access to health and social care services and wider public services in the area, which should also crucially ensure that inequalities around protected characteristics are addressed – particularly for people from ethnic minority communities who face a number of disproportionate challenges in terms of service access (eg. ability to read/write/speak English) and also health outcomes. An example of this could be for developers to reach out to community groups which represent some of the ethnic minority communities in Tameside and Hyde to explore whether support for more community based work in this area would be useful – eg. subsidised community space, as already mentioned. This will also include wider determinants of health such as access to good employment and a commitment to inclusive growth in the immediate area (eg. encouraging real living wage employers; creating opportunities for skills development). There are a range of recommendations in recently published GM wide reports on inequalities. Firstly the GM Marmot Build Back Fairer review which can be found here [Build Back Fairer: The COVID-19 Marmot Review - The Health Foundation](#), which includes specific recommendations for a range of local stakeholders, which developers should take into account; and secondly the inequalities commission report which can be found here [The Next Level: Good Lives for All in Greater Manchester \(greatermanchester-ca.gov.uk\)](#), which more directly focusses on protected characteristics.
- 7.176 I have attached a recent 'neighbourhood health profile' for the wider Hyde area which describes some of the demographic characteristics and some of the key health challenges in the area. This shows that Hyde generally has a relatively high level of deprivation; high levels of respiratory illness linked to smoking; high levels of obesity; and low uptake of relevant healthcare services such as health checks for some groups of people including those with learning disabilities or severe mental illness. Any proposed development should consider these challenges in the wider Hyde area and look to work with relevant healthcare and other public services to try to mitigate the impact of these challenges for the community. High smoking prevalence is a particular challenge in the neighbouring area, with Hattersley Group GP practice reporting 38.95% smoking prevalence of all registered patients which is one of the highest in the borough and significantly above the Hyde PCN average of 21% and well above the England average smoking prevalence of 16.47%. Any activity to support or subsidise health interventions in the community to encourage smoking cessation, such as the council provided Be Well team, offers from GP practices to support patients to stop smoking, and similar offers from pharmacies in the borough should be supported and prioritised.
- 7.177 In terms of the overall population, up to 2030 there is estimated to be a 3.64% overall population growth but in different age groups this varies with a 2.53% increase in the 0-19 age group; no change in the 20-39 group; 3.49% reduction in the 40-59 age group; 12.93% increase in 60-79 age group; and 34.77% increase in the 80+ age group. This breakdown of increases means there is likely to be an impact on health and social care demand in the Hyde area with a growing older population up to 2030, and this should be reflective in provision of housing and community spaces and assets which are 'age friendly'. Further guidance on the Greater Manchester approach to age friendly homes can be found here [Framework for Creating Age-Friendly Homes in Greater Manchester, 2021-2024 \(greatermanchester-ca.gov.uk\)](#). This sets out a vision for creating more age friendly homes across GM. The World Health Organisation also outlines 8 domains in their Age Friendly Cities Framework which aim to improve the wellbeing of older people and increase overall participation of older people. More information available here [The WHO Age-friendly Cities Framework - Age-Friendly World](#).
- 7.178 Noting the key findings of the Health Impact Assessment conducted for this development – it found that there is likely to be significant positive health impacts from this development

particularly around active travel, parks and play areas, community facilities, health and education infrastructure, high quality housing design – therefore assurance should be put in place to ensure that all of these aspects are delivered upon. The HIA also identifies some of the similar health challenges that this response highlights, adding more evidence to the need for steps in the development to enable smoking cessation support, greater physical activity, reduced fast food consumption, and good access to healthier food.

Education

- 7.179 As set out in the Education Service response submitted to Planning in February 2022, the need for additional school places, in particular, secondary and special school places, is critical given the number of houses planned on the site.
- 7.180 Since February 2022, the Education Service has worked hard with the developers to reach an agreed solution to the issue of needing additional school places in the area. This is especially important to continue to enable children from the Hattersley estate for whom Alder Community High School was originally built to attend the school. We agree with the parameter plan setting out the land highlighted for education use. Colleagues continue to work with Alder Community High School and the Special Purpose Vehicle to design a solution to enable Alder Community High School to expand significantly. A costed feasibility solution is expected before the end of 2022. The feasibility solution is a curriculum based model which moves the entire PE curriculum area to a new build facility. This will enable vacated space in the main building of the school to be remodelled to accommodate other curriculum areas. Much of this solution could be completed alongside day to day activity within the school. The flexibility in the parameter plan will enable sufficient flexibility to be innovative in this solution.
- 7.181 As set out in the statutory response to the planning application, the need for additional secondary school places is immediate and will need implementing within the first 50 houses being released as there is little surplus capacity in the Hyde area to accommodate the additional demand. The new PE facility would need to be completed before additional children could be admitted into Alder Community High School as there is no surplus capacity at the school currently or predicted to be in the next few years. The remodelling work within the main building could be completed after the new PE space is operational. The full remodelling will need to be complete by Year 3 of the development or after 140 houses are complete.
- 7.182 There is surplus capacity currently and predicted in the primary school phase to meet expected demand for several years but not the total additional number of places required. Primary capacity would not be needed in the area until Year 14 of the development or after 1800 houses are complete and would need to be an expansion of current schools rather than a new primary school. This would require capital expenditure.
- 7.183 There is no surplus capacity in specialist settings currently or predicted in the future for children with additional needs. A contribution will be needed in order to expand existing provision.
- 7.184 In order to meet the predicted demand from this development, additional places will be needed. The Education Service is therefore seeking the following contribution:

| Phase | Places needed | Cost per place | Total contribution |
|--------------|---------------|----------------|--------------------|
| Primary | 83 | £ 10,459 | £ 868,097 |
| Secondary | 215 | £ 17,974 | £ 3,864,410 |
| Special | 5 | £ 66,420 | £ 332,100 |
| TOTAL | 303 | | £ 5,064,607 |

- 7.185 Providing the above contributions are secured, the Education Service believes that it will be able to meet the demand for places expected as a result of the Godley Green Garden Village development.

Greater Manchester Archaeological Advisory Service (GMAAS)

- 7.186 No objection subject to conditions. The geophysical survey undertaken thus far has identified areas of archaeological potential across the site, but there are large areas that have not yet been assessed due to various access concerns and timetabling considerations. GMAAS expressed that the delivery of the project on a phased basis with heritage considerations secured via planning conditions would be an acceptable approach, but made it clear that this carries risk, particularly where archaeological interests are as yet undefined and could lead to financial, timetabling and masterplan implications.
- 7.187 Given the large area and the plethora of historic environment implications, GMAAS suggested that a catch-all, overarching condition embedded into any forthcoming permission would be advantageous. Some areas may require multiple stages of above and below-ground evaluation and follow-on mitigation, i.e. building survey followed by a demolition watching brief; targeted geophysical survey and evaluation trenching followed by area excavation etc., whereas some areas may require fewer stages, or none. As individual plots/phases of the project come forward the appropriate scheme of works can be selected from the overarching condition, with appropriate methodologies provided in site-specific Written Schemes of Investigation (WSIs). GMAAS are unsure if each phase of development will be accompanied by separate planning applications. If they are, then site/area specific conditions can be applied via consultation with GMAAS (again based around an appropriate scheme of works selected from the overarching condition), but with area/phase conditions signed off piecemeal as the project progresses. Discharge of the overarching condition would follow completion of the final phase of archaeological works once GMAAS are happy that all aspects of the condition have been met, including any final archiving requirements and schemes for heritage presentation, dissemination and publication.
- 7.188 As stated in GMAAS original consultation response, there may be opportunities for community involvement following evaluation phases of works in specific areas. For example, around the former Dove House Farm, where a programme of evaluation trenching is recommended to determine the extent and condition of any archaeological remains of this 17th century farmstead. Dependant on the results of the evaluation this site in particular presents the opportunity for community involvement (excavation project). GMAAS are unsure which phase of the masterplan this falls into (could be Phase 4 or 5 in the north-west area of the site), but again this can be determined in more detail as the relevant phase of the development comes forward for consideration. GMAAS will be happy to discuss appropriate schemes of work with all stakeholders as areas come forward for development, but GMAAS would like to take this opportunity to further state the importance of undertaking all works as early as possible during the project.

Cadent

- 7.189 Would otherwise raise and objection to proposals as a result of potential impacts to the integrity and safe operation of intermediate pressure pipelines. Acknowledge this can be addressed by a condition which they have recommended in applied to any planning consent.

Health & Safety Executive

- 7.190 Online consultation process has been completed; no objections raised.

Network Rail

- 7.191 Note that the proposals include a new active travel link bridge over the railway line to connect the new Garden Village to the existing settlement. In order for the new development to be

fully sustainable, any new link bridge must include step-free access to the railway platform so that rail travel is made available to all the new residents.

- 7.192 Any new bridge over the railway will require agreements with Network Rail relating to its construction, maintenance and also property rights in the form of an easement-which must be in line with our Shared Value policy.
- 7.193 Engagement is also required with Network Rail regarding the proposed new Trans Pennine trail crossing and access point which in its current location is sited on land off the Mottram Old Road in Network Rail ownership.

Historic England

- 7.194 Confirm that they do not wish to offer any comments but suggest that you seek the views of your specialist conservation and archaeological advisers, as relevant. Confirm that it is not necessary for Historic England to be consulted on this application again, unless there are material changes to the proposals.

TMBC Waste Services

- 7.195 No objections, a waste strategy will need to be developed as part of the future planning submissions. All dwellings will need to be served with an appropriate level of bin storage and consideration given to access and servicing arrangements.

TMBC Growth & Regeneration

- 7.196 Tameside Council's Inclusive Growth Strategy (2021-26) sets the vision and objectives of the authority that ensure the economic opportunities, quality of life, health and happiness of the people of Tameside is improved. The IGS Vision "Tameside will be a place where residents can start well, live well, and age well" demonstrates the Council's ambition for growing the local economy in a way that benefits local residents and local businesses. The Council is focused on ensuring that Tameside's town centres are diverse in their offer, encourage a wide demographic of users and ensure that they have a high quality offer, and to reinvent themselves as the heart of the local communities that they serve.
- 7.197 In doing so, The Draft Tameside Town Centre Framework sets the hierarchy for the borough's town centres. Of relevance to the Godley Green Garden Village proposal is Hyde Town Centre and neighbouring Hattersley. As the Socioeconomic statement correctly points out, Hyde suffers from areas of deprivation, particularly in those wards that include the town centre itself. The Council is currently preparing a masterplan for the Hyde Town Centre. The masterplan will ensure an integrated approach to regeneration and ensure the step change that is required in the town centre by way of identifying development opportunities, public realm improvements, accessibility and connectivity and working with the local community to drive change. The masterplan will focus on delivery mechanisms that the Investment, Development and Housing Team will be responsible for implementing tangible proposals and benefits for the town centre as well as an opportunity to raise the profile of Hyde to ensure the town is at the front of the queue of any emerging funding initiatives.
- 7.198 At the Greater Manchester level, Godley Green, Hattersley and Hyde Town Centre form one of the GM Growth Locations: Hyde Triangle. The Godley Green development will provide additional footfall and spend for Hyde contributing to the regeneration of the town centre and the Council welcomes new employment opportunities in construction phase and operation use will also be created. It will be important that access and connectivity between GGGV and Hyde Town Centre are strengthened to encourage residents to access vital local services in the town.
- 7.199 In conclusion, the Godley Green Garden Village proposal will ensure socioeconomic benefits from a town centre regeneration perspective. The proposal will contribute positively to the vitality and viability of Hyde by providing additional footfall, spend, a wider

demographic of customers for key services and businesses and investment opportunities, as well as raising the profile of the area as a place that people will want to live, do business and visit. The Hyde Town Centre Masterplan will provide the delivery platform in ensuring these socioeconomic benefits are delivered to support regeneration in Hyde.

Tameside NHS Primary Care

- 7.200 It is essential in the consideration of all housing development, however certainly of this scale, that access to good quality primary care services is available. Following NHS reform in July 2022, Greater Manchester Integrated Care Board has responsibility for the commissioning of Primary Care services, with a key link with the Tameside Place in relation to General Practice. Dental, Community Pharmacy and Opticians are commissioned on a pan-Greater Manchester footprint and so colleagues would also need to be brought into the development design and considerations.
- 7.201 It is essential all patients have access to General Practice services and that all residents fall within the practice boundary of a practice or practices, therefore ensuring patient choice to register with a practice. The development therefore cannot be approved if this is not in place. The footprint of the Godley Green site is covered by a range of existing practice boundaries.
- 7.202 In line with national strategy, all 31 Tameside practices are aligned into our 4 Primary Care Networks (PCNs). PCNs, in place since 2019, build on existing primary care services and enable greater provision of proactive, personalised, coordinated and more integrated health and social care for people close to home. Clinicians describe this as a change from reactively providing appointments to proactively caring for the people and communities they serve.

Current Position

- 7.203 Capacity across existing General Practice and Community Services estate is a challenge and so the development of the community health and wellbeing hub would need to be a priority in the development. The nearest practice site is Hattersley Group Practice located within Hattersley Health Centre and this is not only a challenge from a transport and access perspective but is a practice already experiencing challenges within its estate capacity and seeing list size growth through housing developments within Hattersley. There are four practices in Hyde Town Centre.
- 7.204 Access to NHS dental services is also already pressured.

Requirements if Godley Green planning application is supported

- 7.205 If the planning application is supported additional healthcare estate will be needed. The current estate is already challenged and therefore this additional geographic development will compound that. What is unclear is how much the population moving into Godley Green would be existing registered patients who could remain with their current practice, ie moving but within the practice boundary and how many would be new to Hyde or new to Tameside and therefore be increase in the local registered population.
- 7.206 The Godley Green development would need to include a community health and wellbeing hub within one of the Village Hubs as part of the existing work to redesign and transform the offer of services to the registered population. This would include both proactive and preventative care as well as acute and urgent care.
- 7.207 There is little NHS capital funding, therefore additional funding would need to be secured via the developer to create the estate infrastructure needed.
- 7.208 Our strategy would then be to work with Hyde PCN to develop access to services for the residents of Godley Green, at a range of locations across Hyde. This may be estate within the Godley Green development as well as consideration of the access and estate across the total Hyde PCN geographical footprint.
- 7.209 The additional impact and pressure on dental access will need to be explored within the development and Community Pharmacy provision mapped.

Scale and Timeline of Additional Health Estate

- 7.210 As noted above, there would need to be investment sought through this development to support the health and community wellbeing infrastructure – covering community spaces for person and community centred offer, supporting proactive care, reducing isolation etc as well as clinical provision of care.
- 7.211 The scale of this would need to be worked up with consideration of the phasing of the development, the housing stock of each phase etc. Similarly, the timeline of additional estate could be incremental and may focus initially on providing support in the surrounding areas ahead of the establishment of facilities within the Village Hub.

Forestry Commission

- 7.212 No objections, advise that; Brockfold Wood, adjacent to Brockfold Farm and Alberts Farm, is an area of ancient woodland and is within the development boundary. Tameside Metropolitan Borough Council should ensure that appropriate mitigation is secured in line with the Standing Advice on ancient woodland.
- 7.213 Please also note that Under the Forestry Act 1967 any tree felling carried out without a felling licence is an offence unless it is covered by an exception. Outline planning permission is not sufficient to demonstrate that the felling of trees is immediately required for the purposes of development. A felling licence will be required in these circumstances unless another reason for exception applies. Our leaflet 'Tree Felling Getting Permission' contains more information about felling licenses, exceptions, and development. We hope these comments are helpful to you. If you have any further queries please do not hesitate to contact me.

High Peak

- 7.214 No comments received

Peak District National Park Authority

- 7.215 An earlier assessment in response to the previous consultation (Autumn 2022) established that the distance of the site from the National Park, and the variable terrain meant that it was not considered to result in a significant visual impact on the National Park. Therefore, this response offers some background information; and focuses on the Design and Access Statement, and the connectivity of the site to the National Park.
- 7.216 The Design and Access Statement shares our travel hierarchy approach, with a focus on encouraging walking and cycling for short journeys, over motorised travel. This is demonstrated in the Strategic Masterplan Objectives; including one of 'Bikes and People over Cars'. This objective is supported by the National Park Authority.

Bolton Council

- 7.217 No comments received.

Bury Council

- 7.218 No comments received

Manchester City Council

- 7.219 No comments received

Oldham Council

- 7.220 No comments received

Rochdale Council

- 7.221 No objection to the proposals.

Salford Council

- 7.222 No objections to the proposals.

Stockport Council

- 7.223 Objected 09/12/2022. Confirming that they consider the transport impacts and requirements of the development have been properly assessed and, based on the information contained in the TA, it is considered that the development may have a detrimental impact on the roads with the Borough of Stockport and sufficient opportunities will not be available to allow occupiers and developers to the site to walk, cycle and use public transport.
- 7.224 A further objection was submitted on 18/10/2023 outlining concerns with modelling undertaken as part of the Transport Assessment and conclusions reached on mitigation.
- 7.225 I write further to your consultation on this planning application to advise that Stockport Council formally objects to the proposal. The reason for this maintained objection is outlined in the comments below. We consider that this application should not be determined until the matters outlined in his letter have been addressed, and following further consultation with this Council. We remain available to discuss our concerns with Tameside and the applicant directly.
- 7.226 This application, which seeks outline consent (with all matters reserved other than access) for the erection of a new residential-led, mixed-use development at land off Mottram Old Road, Hyde, is a further update to an application which highway / transportation comments were provided in December 2021 under SMBC application reference DC/083569 and in December 2022 under SMBC application reference DC/087031. The TMBC application reference remains the same (application 21/01171/OUT).
- 7.227 It is noted that the applicant has outlined in a letter of the 19th July 2023 that:
- Updates have been made to the technical information, including on highways issues.
 - Minor updates have been made to the Land Use Parameter Plan, Density and Height Parameter Plan and Indicative Phasing Plan.
 - The phasing strategy has been updated.
 - Minor updates have been made to the access drawings to align with off-site enhancement works to Mottram Old Road.
 - Minor updates have been made to the Design and Access Statement (including the Design Code) to reflect the updated plans; and
 - Minor amendments have been made to the Planning Statement
- 7.228 As outlined in comments made on the original submission, whilst the site is located within the Metropolitan Borough of Tameside, it is located just 1km from the northern boundary of the Metropolitan Borough of Stockport. As such, a proportion of trips generated by the development will be distributed onto the road network within the Metropolitan Borough of Stockport (notably the A560, Stockport Road) and a proportion of trips by foot, cycle and public transport will also be on the Borough's transport network. Various residents of Stockport who travel through or within the vicinity of the site (either for commuting, business, shopping or leisure purposes) could also be affected by the development. As such, it is considered that Stockport Council, as Highway Authority for the Metropolitan Borough of Stockport, needs to review and assess the implications of the development, alongside Tameside MBC. In addition, due to the scale and nature of the development, National Highways and Transport for Greater Manchester also need to review the application. There is obviously some overlap in respect to the highways and transportation issues and therefore, in such cases, Stockport MBC, seeks to work with other organisations in order to gain consensus, where relevant.
- 7.229 After examining the revised / additional drawings and documents (notably the Transport Assessment Addendum, which forms Appendix 12.3 of the Environmental Statement, I would make the following comments:

Consultation

- 7.230 The planning application was supported by a Transport Assessment, dated September 2021 and prepared by the Traffic, Transport & Highway Consultancy (TTHC Ltd). No scoping discussions took place with any Stockport Council Development Management officers to agree the scope of the assessment, in accordance with recommended guidance. This was disappointing given the potential of this major development proposal to impact on the safe and efficient operation on highway network within the Metropolitan Borough of Stockport.
- 7.231 Owing to the inadequacies in the original Transport Assessment, Stockport Council issued a formal objection dated 21st December 2021. Similar holding objections were received from Transport for Greater Manchester (TfGM), National Highways (NH) and TMBC Highways.
- 7.232 In response to these substantive concerns Tameside Council's Principal Planning Officer (Major Developments), Steven Kirkham convened a series of "roundtable" meetings in early 2022 with interested parties (TfGM, NH, TMBC Highways and SMBC), the Applicant and their transport consultants TTHC with a view to addressing concerns and agreeing a revised scope for the TA.
- 7.233 On the May 2022, the Applicant's planning consultants (Gerald Eve LLP) advised all parties that: "Following the recent meetings, and difficulties with agreeing a revised scope for the TA, the decision has been taken to bring in a new transport adviser to seek to draw together the comments of the statutory consultees and update the scope for the TA. The intention is to agree the revised scope as quickly as possible, to enable all survey work to be undertaken before the school holidays and a revised TA to be submitted over the summer."
- 7.234 Eddisons were accordingly appointed to take on this role. No subsequent roundtable meetings were convened (including the roundtable meeting scheduled for the 26th May 2022) and no overarching scoping document has been prepared (or at least none that was shared with SMBC).
- 7.235 The only limited consultation with Eddisons took place in June / July 2022, which centred on the approach to trip distribution which was left unresolved. Following SMBC's response dated 22nd July 2022, Eddisons provided a holding response the same day saying simply and clearly that: "We'll review and provide a response".
- 7.236 No response or any form of further communication was forthcoming prior to the issue of the new TA dated November 2022, included as part of an updated planning application consultation dated 7th November 2022.
- 7.237 Following consultation and review of the updated planning application, Stockport Council responded on the 9th December 2022 in which it formally objected to the proposal (a copy of this letter is attached). The reason for this objection related to highway matters set out in the letter. The letter also outlined that the Council advised that the application should not be determined until the matters outlined the letter had been addressed and following further consultation with the Council.

The principal concerns outlined were:

- Area of Potential Impact: No justification for excluding A560 Stockport Road / A6017 Lower Bents Lane signal-controlled junction from the area of potential impact.
- Trip Distribution: An over-estimation of the proportion of development-related traffic assumed to route via Denton Island and M60 south compared to the A560 and Travellers Call junction, and therefore an under-estimation of the potential impact of development-traffic to several key junctions within the Metropolitan Borough of Stockport, with no mitigation put forward to ameliorate these impacts; and
- Junction Operation: no validation of the base traffic models for either the A560 Travellers Call junction or A560 / George Lane junction which were reported to be operating within capacity at peak times.

7.238 Some level of consultation did take place during December 2022 and January 2023, the main outputs from which are recorded in email correspondence dated 13th December 2022 and 6th January 2023, between Eddisons (on behalf of the applicant) and WSP (on behalf of Stockport Council), namely:

- Eddisons email dated 13th December 2022: “Whilst I do think a proportion of traffic will route via J24, particularly trips from the eastern village, in order to move things forward we’ve amended the outbound and inbound distributions so that any trips travelling from the site to/from J25 would route via the A560. Similarly, any trips that had been shown to travel to/from the site to J24 via the A560 are now shown to utilise the M67 (though the proportion of trips previously assumed to do this was, in any case, low). The resulting distribution is shown on Figs 33 and 34 of the attached.

For completeness, if you could confirm you are content with this distribution and the resulting traffic flows, we can re-run the assessments, also picking up the A560 Stockport Road / A6017 Lower Bents Lane signal-controlled junction at the same time.”

- WSP email dated 11th January 2023: “I am pleased to report that we are satisfied with the revised trip distribution, but as discussed prior to Christmas are not satisfied with the proposed trip generation calculations for the reasons set out in the Council’s initial holding objection [dated 14th December 2021], and review attached. We would welcome further discussion on this matter.” [A copy of WSP’s review on the topic of trip generation is attached as Appendix B]

7.239 No response was received to WSP’s email dated 11th January 2023, and no form of further communication has been forthcoming, from either Eddisons or the applicant / scheme promoter, prior to (or indeed subsequent to) the issue of the TA Addendum, included as part of the latest planning application consultation dated 27th July 2023.

7.240 Comments on additional information / updated submission

7.241 A Transport Assessment Addendum, together with a number of revised drawings have been submitted as part of this updated submission. It is noted that there have been no fundamental changes to the layout of the scheme, but some amendments have been made to the site’s access arrangements and associated works on Mottram Old Road. As the whole site and site accesses are within Tameside, it is appropriate for Tameside MBC Highways Development Management to review the site layout and access arrangements and the amendments that have been made. I would, however, refer you to the comments I made on site layout, access arrangements and works on Mottram Old Road, as well as pedestrian and cycle connections and routes in the area, in my initial response.

7.242 There is a fairly limited mitigation package / package of accessibility improvements (having regard to the scale and nature of the development) proposed as part of the development which is disappointing. I also note that improvement works for pedestrians and cyclists on the A560 corridor are limited due to land ownership. This is likely to limit the number of trips made by sustainable modes of transport and I note that the likely impact of this package on trip numbers does not appear to have been determined. Without a comprehensive package of measures being provided to ensure that opportunities to travel by sustainable modes of transport are available and are maximised, the proposal would fail to comply with Paragraphs T1, T7 and T8 of the Tameside Unitary Development Plan (2004) and the National Planning Policy Framework (2023).

7.243 I would therefore recommend that Tameside MBC negotiates with the applicant to ensure that a comprehensive package of improvements which maximises trips by

sustainable modes are delivered as part of the development and these are front-loaded as much as possible so as to ensure that these are available to occupiers of earlier phases of the development and travel patterns using non-sustainable modes of transport are not established.

- 7.244 It is noted that the TA Addendum outlines that the applicant has agreed to fund an improved bus service (extending the 346 Ashton-Hyde service to the site, with the service operating every 20 minutes) and implement a full Travel Plan for the site. With respect to the former, I will defer to TfGM to comment on this and whether they consider this measure will be sufficient. With respect to the latter, as previously advised, it was considered that the Travel Plan that was originally submitted was weak and, as such, I recommended that any approval granted is subject to a condition / obligation which requires the production and implementation of a robust Travel Plan (to ensure compliance with Policy T11).
- 7.245 With respect to the transport impact, it is considered that the TA Addendum has not addressed the issues raised in respect the two previous consultation responses and in correspondence between the Council's Consultants, WSP, and the applicant's consultant's Eddisons.
- 7.246 Notwithstanding that, it is noted that the LINSIG modelling included in the TA outlines that a number of junctions within the Borough of Stockport will be materially affected by the development, including:
- A560 Hyde Road / Pennine Road Signalised Junction
 - A560 Hyde Road / George Lane / Stockport Road East / Redhouse Lane Signalised junction
 - A560 Ashton Road / Stockport Road East / B6104 Stockport Road West (Travellers Call) Signalised Junction
 - B6104 Stockport Road West / New Zealand Road / Carrington Road / New Bridge Lane Signalised Junction
- 7.247 I note that the modelling (for the modelled year 2040) shows the development resulting in a material increase in queuing at the Hyde Road / Pennine Road junction (e.g., up to 10 vehicles on the Hyde Road Eastbound approach during the PM peak), albeit with the junction still operating within capacity and the Travellers Call Junction (e.g. up to 18 vehicles on the Stockport Road West approach during the PM peak), with the junction operating over capacity with and without development. It also shows material increases in queuing at the Stockport Road West / New Zealand Road / Carrington Road / New Bridge Lane Signalised Junction (e.g., up to 22 vehicles Stockport Road West approach during the AM peak).
- 7.248 With respect to the Hyde Road / George Lane / Stockport Road East / Redhouse Lane Signalised junction, it is noted that the modelling shows a very significant increase in queuing during the PM peak, with an increase of 61 vehicles predicted on the Stockport Road East approach.
- 7.249 It is disappointing and surprising that the applicant has not tabled proposals to mitigate the impact at these junctions, notably the latter junction. Whilst I note the applicant has argued in Paragraphs 6.1.47-6.1.53 that they do not consider this impact at this junction needs mitigating, I would highlight that Paragraph 110 of the NPPF outlines that "in assessing...specific applications for development, it should be ensured that 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". As such, I would argue that the NPPF clearly outlines that significant impacts should be mitigated. I note that TfGM have outlined that they consider a scheme to mitigate the impact at this junction should be explored.
- 7.250 Finally, it is noted that other junctions within the Borough of Stockport which the distribution diagrams contained in the TA Addendum indicate could be affected by the development (e.g., they would see increases of 30+ vehicles through them at peak hour) have not been modelled, notably:
- A560 Stockport Road West / Stockport Road East / A6017 Lower Bents Lane / Hollingworth Road Signalised Junction

- A560 Stockport Road West / The Broadway / Morrisons Signalised Junction
- A560 Ashton Road roundabout

Without these junctions being assessed, it is considered that the TA Addendum does not comprehensively assess the impact of the development on the highway network within the Borough of Stockport.

Conclusion

7.251 As outlined in my previous Consultation Responses, whilst the proposed development is situated within, and will be accessed from roads which are solely within, the Metropolitan Borough of Tameside, due to the proximity of the site to the Metropolitan Borough of Stockport, the trip generation of the development and the expected distribution of these trips, it is considered that the development could have an adverse impact on the highway network within the Metropolitan Borough of Stockport. It could also have an impact on public transport services within the Borough of Stockport and occupiers and those accessing the development may wish, or require, to travel on roads and paths within Borough of Stockport by foot and cycle. As such, Stockport Council, as local highway authority for the Metropolitan Borough of Stockport, considers the need for transport impacts and requirements of the development in Borough to be fully assessed and any required mitigation measures outlined, in accordance with both local and national policy, including Paragraph 113 of the NPPF and Policy T14 of the Tameside Unitary Development Plan. Whilst a Transport Assessment (TA) was originally submitted in support of the application and this has now been followed on with a TA Addendum, the scope of neither document was agreed with Stockport Council.

7.252 In Consultation Response of the 9th December 2022, I outlined that I did not consider that the transport impacts and requirements of the development had been fully or properly assessed and I do not consider that the information contained in the TA Addendum has addressed the issues previously raised. Issues previously raised in respect to how the impact of the development on the highway network has been assessed have not been addressed, the modelling results contained in the TA Addendum show the development will have a material impact on a number of junctions within the Borough of Stockport and the applicant has not tabled any proposals to mitigate the impact at these junctions. It is also noted that not all junctions within the Borough of Stockport that could be affected by the development have been assessed.

7.253 As such, it is considered that the TA Addendum and other information that has been submitted have not addressed the issues previously raised by SMBC and, as such, the applicant has not yet demonstrated that the development will comply with both local and national policy, notably the National Planning Policy Framework (2023) and the Tameside Unitary Development Plan (2004). Accordingly, I remain of the view that insufficient information has been submitted to enable the application to be determined and would therefore recommend that Tameside are advised to not determine the application at this stage and that they are requested to advise the developer and their consultants to actively engage with Stockport Council with the aim of addressing the issues outlined.

Trafford

7.254 No objections to the proposals.

Wigan

7.255 Confirm no objections to the proposals

Greater Manchester Combined Authority

7.256 No comments received.

8. ANALYSIS

- 8.1 Section 38 of the Planning and Compulsory Purchase Act 2004 states that applications should be determined in accordance with the development plan unless material considerations indicate otherwise. Paragraphs 2 and 219 of the National Planning Policy Framework (NPPF) state that the policies contained therein are material considerations which should be taken into account in dealing with applications.
- 8.3 Paragraph 7 states that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 11 states that plans and decisions should apply a presumption in favour of sustainable development. For decision taking this means:
- approving development proposals that accord with an up-to-date development plan without delay; or
 - where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting planning permission unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides 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 the Framework taken as a whole.
- 8.4 As stated at paragraph 2.8 of this report, the proposed development comes within schedule 2 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (the EIA Regulations). An Environmental Statement (ES) accompanies the application, where two addendums were submitted during the determination period.
- 8.5 The fundamental obligation under the EIA Regulations is to have sufficient environmental information to judge the likely effects of the development on the environment. The cases of *R.v Rochdale MBC Ex p.Tew* [2000] and *R. v. Rochdale MBC Ex p. Milne (No.2)* [2001] set out the relevant principles relating to EIA and application for outline planning permission:
- The more detailed a proposal, the easier it will be to ensure compliance with the EIA regulations;
 - The permission must create 'clearly defined parameters' within which the framework of the development must take place. Those parameters must achieve a level of detail that is likely to exceed what would be required as a matter of domestic planning law. It is for the local planning authority in granting outline planning permission to impose conditions to ensure that the process of evolution keeps within the parameters applied for and assessed;
 - Taken with those defined parameters of the project, the level of detail of the proposals must be such as to enable a proper assessment of the likely environmental effects, and necessary mitigation – if necessary considering a range of possibilities;
 - The level of information required is 'sufficient information to enable "the main", or the "likely significant" effects on the environment to be assessed under para 2(b) and (c), and the mitigation measures to be described under para 2(d);
 - The 'flexibility' referred to is not to be abused, it does not give developers an excuse to provide inadequate descriptions of their projects. It is for the local planning authority to decide whether it's satisfied that it has full knowledge of its likely significant effects on the environment;
 - It is for the planning authority to determined what degree of flexibility can be permitted; and
 - Reserved matters are not modifications that require their own EIA, since they are part of the same project that has been assessed.
- 8.6 In this case, officers have reviewed the submitted Environmental Statement and its addendums. All factors have been taken into account and officers are of the view that there is sufficient environmental information such that the submission meets the requirements of the above and can be used as a basis for determination of the application.

9. PRINCIPLE OF DEVELOPMENT

- 9.1 The majority of the site is allocated as Green Belt, where saved policy OL1 of the UDP is the starting point. This policy is broadly consistent with NPPF paragraph 149 in setting out exceptions to inappropriate development and in what circumstances development in the Green Belt may be acceptable. There are some limited inconsistencies with the exact tests of the Framework, however the policy remains broadly consistent in matters material to the application and should be given full weight.
- 9.2 Policy OL1 states that the Green Belt will continue to be protected from inappropriate development and approval will not be given except in very special circumstances, for the construction of new buildings, subject to a number of exceptions. NPPF paragraph 147 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 148 states that 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.
- 9.3 The application proposes a substantial amount of built development, including the erection of up to 2,150 dwellings. It does not meet any of the exceptions identified in the UDP or NPPF. The proposed development amounts to inappropriate development in the Green Belt. Policy OL1 and the NPPF are explicit that the development should not be approved except in very special circumstances.
- 9.4 What results in very special circumstances is not defined within either the NPPF or local policy. There could be a single and substantial factor that clearly outweighs the harms, or a number of seemingly ordinary benefits which, when considered in isolation might not be individually particularly noteworthy, but collectively, clearly outweigh the harms, to amount to 'very special circumstances' existing. The weight given to any particular factor, and their combination, is a matter of planning judgement for the decision taker.
- 9.5 In accordance with Paragraph 148 of the NPPF, this report will evaluate harm to the Green Belt, any other harm and any other considerations, before coming to a conclusion as to whether very special circumstances exist. In assessing harm, the following weight has been ascribed to each matter either in favour or against the proposed development:
- Neutral;
 - Limited;
 - Moderate;
 - Significant; or
 - Substantial.

10. HARM TO THE GREEN BELT

Harm by Definition

- 10.1 As stated above, the proposal is inappropriate development in the Green Belt. Paragraph 147 of the NPPF states that inappropriate development is, by definition, harmful to the Green Belt. Paragraph 148 states that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. Having established that there is definitional harm, it is necessary to consider other forms of harm to the Green Belt. The next subsections will therefore consider the impact of the

proposal on the openness of the Green Belt and the impact on the purposes of including land in the Green Belt.

Impact on Openness

- 10.2 Paragraph 137 of the NPPF states that 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. This approach is supported by the policies of both the UDP and Places for Everyone (PfE).
- 10.3 Planning Practice Guidance provides further advice on what factors can be taken into account when considering the potential impact of development on openness. This guidance clarifies that assessing this impact requires a judgment based on the circumstances of the case in question. Furthermore, the guidance gives a number of examples where the courts have identified a number of matters which might need to be taken into account in making the assessment. In summary these include, but are not limited to:
- openness is capable of having both spatial and visual aspects;
 - the duration of the development, and its remediability; and
 - the degree of activity likely to be generated, such as traffic generation.
- 10.4 The applicant acknowledges the spatial impact on openness the proposal is likely to have, noting the site as it currently exists is largely free from built development and has a strong sense of openness. The applicant outlines that the development would result in a considerable reduction in the spatial openness of the site given the significant amount of built development. This is recognised and agreed.
- 10.5 Visually the applicant draws upon the findings of the submitted landscape and visual impact assessment report, noting that although there are a number of viewpoints which are said to have beneficial impacts, there are also a number which are deemed to have a visually adverse impact. These, however, are noted to relate to largely localised points to the development with impacts described as either minor or not significant. The applicant describes the impact upon visual openness as limited.
- 10.6 However, as set out within this report in assessing the landscape and visual impacts of the proposed development, there are a number of highly sensitive views across the site. The development will be permanent and will transform the landscape from rural to an urban setting. The retention of on-site open space, alongside the naturally undulating topography and the retention and establishment of landscaping is expected to assist in mitigating this impact, aiding the development to assimilate visually into its surroundings over time. However, it is considered, contrary to the applicant, that the development proposals would negatively impact visual openness both within the site and from its surroundings.
- 10.7 Overall, the development would result in harm to spatial and visual openness, contrary to the requirements of paragraph 137 of the NPPF. It is now important to consider the impact of the proposal on the purposes that land within the Green Belt should serve.

Impact on purposes

- 10.8 Paragraph 138 of the NPPF sets out that Green Belt serves the following 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.
- 10.9 Review of the impact on the purposes of the Green Belt was undertaken as part of the PfE evidence base, including the Stage 2 Greater Manchester Green Belt Study – Assessment

of Proposed 2019 GMSF Allocations (Sept 2020) and subsequent addenda. This assessed the potential impact on the Green Belt that could result from release of land within the proposed development allocations in the plan. This is not to be confused with other studies undertaken to inform the plan which assessed the combined effect of proposed released and proposed new Green Belt on the strategic functioning of the Greater Manchester Green Belt, and the contribution to the Green Belt purposes that would be made by additions to the Green Belt.

10.10 The application site and the proposed allocation are not exactly the same, but there are only minor differences meaning that the explanation and conclusions of the above study are broadly relevant. However, although the judgements below take account of the study, they are made within the context of specific consideration of the proposed development.

a) To check the unrestricted sprawl of large built up areas

10.11 The site comprises open farmland and equine activity, and includes several large dwellings, stables and farmsteads. Although contained by urbanising development on three sides, in addition to the A560 to the south, development within this area would constitute sprawl. The land has a strong distinction from the urban edges, where existing urbanising features have a limited influence upon the character of the landscape. The site has a strong sense of openness which comprises undulating farmland, woodland and areas of recreation. Hyde is part of the Greater Manchester large built-up area, so development expanding within this area would constitute sprawl.

10.12 The openness, and strong distinction of the site on the urban edge, created by the railway lines and wooded brook, contribute to its role in preventing sprawl. The application proposes development outside of the existing defined urban area and would therefore lead to an expansion of the built-up area and is therefore considered to have a significant impact on this Green Belt purpose.

b) To prevent neighbouring towns merging into one another

10.13 The site borders established residential areas within Godley and Hattersley which all form part of the township of Hyde. Whilst the land provides a gap between these suburbs it does not lie directly in a gap between neighbouring towns. The land serves limited/no purpose in preventing neighbouring towns merging and as such it would not conflict with this purpose.

c) To assist in safeguarding the countryside from encroachment

10.14 The site is characterised by its rural environment, comprising pockets of buildings and farmsteads within a countryside setting. Despite the urbanising features found at the site, it has strong distinction between the existing urban edge and retains a relationship with the surrounding countryside. The development would therefore result in encroachment into the countryside and would have a significant impact on this purpose.

d) To preserve the setting and special character of historic towns

10.15 The proposed development does not abut an identified historic settlement and does not have a physical or visual relationship to the setting or significance of an historic town. The proposed development would not conflict with this purpose.

e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

10.16 The proposal does not assist in urban regeneration by encouraging the recycling of derelict and other urban land. The evidence prepared for PfE shows that Tameside cannot meet its housing requirement from the urban area alone. This is confirmed by the Strategic Housing and Economic Land Availability Assessment (SHELAA). The scale of the development would have a significant impact upon the supply of housing elsewhere within the Borough. However, as presented by the applicant, given the scale of the Council's current unmet need, and the scale of the application site there is no conflict with this purpose given that no such comparable prospect exists within the urban area.

Conclusion of Impacts on the Green Belt

- 10.17 The proposal would be inappropriate development within the Green Belt, and therefore is harmful by definition. Further, the proposal would conflict with two of the five purposes that Green Belts serve through representing urban sprawl and encroachment into the countryside. Additionally, the proposal, despite the mitigations proposed, would negatively impact both spatially and visually upon openness. In conclusion, the conflict with purposes, taken together with the impact upon openness and definitional harm by reason of inappropriateness, culminate that very substantial weight should be attached to the harm to the Green Belt as a result of the proposal.

11. OTHER HARM

- 11.1 As set out in paragraph 148 of the NPPF, there is a need to assess whether any other harm would result from the proposed development.

12. HIGHWAYS, TRANSPORTATION & ACCESS

Applicant's case

Access

- 12.1 The application is in outline with all matters reserved except for access. This means that access to the site is for detailed consideration at this time. The proposals would see the development 4no accesses from Mottram Old Road designed as priority junctions (2 for each village). The parameters plan provided for each junction is limited to an access stub. The indicative masterplan provides more context and shows that the western village would primarily be served by a single access onto Mottram Old Road. An additional access into the village would also be provided from Mottram Old Road, and would serve a small proportion of the western village (up to 50 dwellings) and provide an emergency access route to the wider village should the main access be blocked. The eastern village would be served by two vehicular access points from Mottram Old Road; one at the eastern extent of the village and one at the western extent of the village. The indicative masterplan identifies that the two junctions would be connected by a through-road that runs through the eastern village.

Traffic Impact & Active Travel

- 12.2 The impact of the development on the highway network is assessed in chapter 12 of the ES and a transport assessment (TA). The documents assess the impacts of the development on the local and strategic highway network. The TA assumes an opening year of 2024, anticipates a completion by 2040 and assesses the impact of the proposed development during typical traffic conditions, where it is accepted that exceptional circumstances (e.g. road traffic collisions or road closures) cannot be assessed. The ES establishes the current and future baseline conditions, it also assesses the likely effects of the development during the construction and operational phases. A framework travel plan and phasing proposals also accompany the assessment.
- 12.3 The TA has used complex analyses to model the traffic generated by the site. People trip rates have been obtained from the TRICS database and then a series of calculations have been carried out to forecast the traffic generation, including the use of the National Travel Survey datasheets. The analysis is finalised with use of trip rates from the TRICS databases to calculate the inbound and outbound flows.
- 12.4 The assessment estimates that the development would be expected to generate the following vehicle trips;
- 237 arrivals and 636 departures in the AM peak (8 – 9am); and

- 660 arrival and 389 departures in the PM peak 5 – 6pm.

12.5 In terms of vehicle movements, it is predicted that 62% of outbound trips will travel in an eastbound direction; and 38% travelling westbound. Inbound trips from the distribution analysis are shown to be 59% from the east; and 41% from the west.

12.6 The TA has been revised during the determination period, including the scope, and its associated inputs. The submission has been reviewed by the local highway authority (LHA), Transport for Greater Manchester (TfGM), National Highways (NH) and Stockport MBC. The TA presents capacity modelling at the following junctions on the highway network.

- Proposed eastern and western site entrances onto Mottram Old Road
- Stockport Road/Ashworth Lane/ Underwood Road signalised junction
- Dukinfield Road/Lower Bennett Street priority junction
- A57 Manchester Road/ Hulme Road/ Denton Golf Club signalised junction
- A57 Hyde Road/A6010 Pottery Lane signalised Junction
- Mottram Old Road/Spring Avenue/ Werneth Avenue staggered priority junctions
- A560 Stockport Road/B6468/Mottram Old Road priority junction
- B6468 Stockport Road/ Lilly Street priority junction
- B6468 Stockport Road/James Drive/Smithy Lane mini-roundabout
- B6468 Market Street/Dowson Road signalised junction
- B6468 Market Street/Union Street signalised junction
- M67 Junction 3 westbound slip / A57 Market Street Priority junction
- Stockport Road / Joel Lane Priority junction
- A560 Hyde Road / Pennine Road signalised junction
- A560 Hyde Road/George Lane/Stockport Road East/ Redhouse Lane signalised junction
- A560/B6104 Stockport Road west signalised junction
- B6104 Stockport Road west / New Zealand Road / Carrington Road / New Bridge Lane signalised junction
- M67 Junction 1A off slip/A6017 Ashton Road signalised junction
- M67 junction 1A westbound on-slip / A6017 Ashton Road/Lance Corporal Andrew Breeze Way signalised junction
- M67 junction 2 westbound off slip / A57 Hyde Road signalised junction
- M67 junction 2 westbound off slip / A57 Hyde Road signalised junction
- M67 junction 2 eastbound on slip / St Annes Road priority junction
- M67 junction 3 eastbound off slip / Clarke Way signalised junction
- M67 junction 3 westbound off slip / Clarke Way signalised junction
- Vissim modelling Denton Island M60 Junction 24

Active Travel

12.7 The applicant states that active travel would be promoted through the site by provision of safe, convenient and attractive links to key spaces, including education, service, recreation and public transport connections. There would be connections between the east and west villages, as shown on the illustrative framework masterplan. The parameters plan shows the potential for sustainable transport links to Alder Community High School.

12.8 In terms of accessibility, the applicant states they have demonstrated the following:

- There are a wide range of amenities within a short walk of the proposed development site;
- Pedestrian and cycle access to the site is good, with existing pedestrian and cycle routes being located in the vicinity of the site;
- The site is accessible by bus, with up to 7 buses per hour operating in the immediate vicinity of the site, providing access to a range of destinations in and around Greater Manchester;

- The site is accessible by rail, with two stations in close proximity to the site. These will both provide access to a range of destinations around Greater Manchester, and Derbyshire

They conclude that on the basis of the above, the site is accessible and caters for needs of future residents and visitors. As such, this will assist in promoting a choice of travel modes other than the private car, as set out in NPPF.

- 12.9 The site access roads have been designed to accommodate buses and an indicative bus strategy is submitted with the TA. This seeks to ensure that future residents would be within walking distance of bus stops, so far as is practicable, and that this encourages use of sustainable modes of transport.
- 12.10 There would be a new bridge connection to Hattersley, at the eastern village, providing pedestrian/cycle access both to the station and the settlement beyond. The link would integrate into the existing and proposed pedestrian and cycle network, including the TPT. It is acknowledged that provision of the link would expand the general walk and cycle catchments further eastwards.
- 12.11 Green Lane is a private road and provides access onto Mottram Old Road, where it links through the site on a north south alignment to St Pauls Hill Road. The proposals would see this retained and upgraded to serve existing dwellings, pedestrians, cyclists and equestrian users as part of an active travel network.. Green Lane would not be opened up to provide direct access to serve either new dwellings or commercial uses within the development.
- 12.12 The applicant states that the development would both retain and enhance public rights of way (PRoWs) within the site, ensuring that they are key features of the active travel network. This is a benefit for both existing and future residents. They say that the proposal would also enhance the Trans Pennine Trail (TPT) and National Cycle Route, providing a new traffic free route through the site that connects with key facilities including the eastern village centre and the associated bridge connection to Hattersley. The proposals also include provision of dedicated Pegasus and Puffin crossing points across Mottram Road which would enhance connectivity to Werneth Low Country Park.

Proposals for Mitigation

- 12.13 Within the context of the above, a summary of the transport proposals/mitigation measures is set out below:
- New bridge to link the eastern village with Hattersley, including the rail station
 - Improvements to the A560 Hattersley viaduct bridge
 - Improvements to existing PRoW through Godley Brook and onto Brookfold Lane for sustainable transport users to access Godley Station from the west and eastern villages
 - Internal connectivity between proposed Eastern and Western villages
 - Financial contribution to bus service improvements
 - Diversion and improvement to existing TPT through the eastern village
 - Provision of dedicated Pegasus and puffin crossing on A560
 - Improvements to the walking and cycling facilities along the A560 corridor
 - Traffic calming features on Lilly Street/Werneth Avenue
 - Speed limit and reduction measures along Mottram Old Road
 - Upgrades to Green Lane to accommodate walking/cycling/equestrian users
 - Improvements to existing signalised junction at Stockport Road / Ashworth Lane
 - Upgrades to signals along the Market Street/Dowson Road corridor
 - Upgrades to signals M67 slip / Clarke Way
 - Improvements to bus stops along the A560 (site frontage)
 - Footpath improvements to Apple Street

The Council's assessment

Policy

- 12.14 Paragraph 110 of the NPPF states that, in assessing 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;
 - c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and
 - d) 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.
- 12.15 Paragraph 111 of the NPPF adds that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highways safety, or if the residual cumulative impacts on the road network would be severe.
- 12.16 Paragraph 112 promotes active travel measures by giving priority to pedestrians and cyclists. It also advocates (so far as possible) that developments facilitate 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.
- 12.17 Paragraph 113 of the NPPF states that all developments that will generate significant amounts of movement should be required to provide a travel plan. The application should be supported by a transport statement or transport assessment.
- 12.18 Policy T1 of the UDP refers to Highway Improvement and Traffic Management. The policy establishes a number of aims for access arrangements for new developments.
- 12.19 Policy T8 of the UDP relates to walking and establishes that public rights of way will be protected where they fall within sites proposed for development, subject to consideration of opportunities for local re-routing.
- 12.20 Policy T11 relates to travel plans and requires travel plans to be produced in support of proposals for new development expected to result in significant travel implications.
- 12.21 Policy T13 establishes requirements around transport investment and expects the demands placed on existing infrastructure to be rectified by improvement schemes facilitated by the developer, where appropriate.
- 12.22 Policy T14 relates to the provision of transport assessments on development which may have significant transport implications.

Access

- 12.23 The design and location of the proposed access junctions have been reviewed by the LHA who acknowledge that they accord with relevant technical standards in terms of visibility, geometry and safety requirements for pedestrians and cyclists. The provision of the *entrances* would be delivered as part of an initial phase of essential infrastructure works, the phasing and exact design/landscaping could be secured by way of planning conditions.

Traffic Impact

- 12.24 The LHA, Transport for Greater Manchester (TfGM) and National Highways have reviewed the ES and TA and are satisfied with the trip generation and trip distribution analysis that has been produced for the scale of development. Stockport MBC has raised a concern that the proportion of development related traffic assumed to route via Denton Island and the M60 south has been over-estimated and that as a result, the impact on key junctions in Stockport

has been under estimated. Whilst this concern is acknowledged, evidence provided by statutory consultees means that these aspects of the TA are accepted.

- 12.25 It is noted that due to the scale of the proposals the development would be delivered in phases across a minimum period of 15 years, although it is conceivable that this may be longer recognising the influence of external factors such as market conditions. The associated traffic impacts (growth) would be residual in their nature, and this will be aligned to progress on delivery of the site. A phasing plan for transport-based infrastructure and mitigation would ensure that there would be a coordinated approach to with site delivery.
- 12.26 It is acknowledged that the proposed development would increase traffic flows on the surrounding highways resulting in some additional queueing and delay at junctions which would be an adverse impact of the development. Following review by the LHA and TfGM, the following mitigation measures have been identified which would be secured by condition:

| Location | Baseline Capacity | 2040 Capacity with Development | Mitigation |
|---|---|--|--|
| Proposed eastern and western site entrances onto Mottram Old Road | Not reported as new accesses to be provided. | Forecast operate well under capacity. | None identified. None needed other than the agreed site layouts contained in the drawings. |
| Stockport Road/Ashworth Lane/ Underwood Road signalised junction | Forecast to operate within capacity | At capacity in the 2040 am peak scenario. | Mitigation proposed via a contribution to junction improvement to be conditioned. |
| Dukinfield Road/Lower Bennett Street priority junction | Forecast to operate slightly above capacity in the am peak period | Forecast to operate at a similar level of capacity in 2040 | No mitigation required |
| A57 Manchester Road/ Hulme Road/ Denton Golf Club signalised junction | Forecast to operate well below capacity | forecast to operate well below capacity | No mitigation required |
| A57 Hyde Road/A6010 Pottery Lane signalised Junction | Forecast to operate around capacity in the am and pm periods. | Forecast to have modest increase in traffic queues. | Mitigation - SCOOT to be implemented at the traffic signal junction and funded by the Applicant. Details to be conditioned. |
| Mottram Old Road/Spring Avenue/ Werneth Avenue staggered priority junctions | Forecast to operate within capacity | Forecast to operate within capacity | Mitigation to be provided in the form of traffic monitoring and traffic calming may be implemented subject to changes in traffic flows above agreed levels. Details to be conditioned. |
| A560 Stockport Road/B6468/Mottram Old Road priority junction | Forecast to operate within capacity | Forecast to operate within capacity | No mitigation required |
| B6468 Stockport Road/ Lilly Street priority junction | Forecast to operate within capacity | Forecast to operate within capacity | Mitigation to be provided in the form of traffic monitoring and traffic calming may be implemented subject |

| | | | |
|--|--|--|--|
| | | | to changes in traffic flows above agreed levels. |
| B6468 Stockport Road/James Drive/Smithy Lane mini-roundabout | Forecast to operate within capacity | Forecast to operate within capacity | No mitigation required. |
| B6468 Market Street/Dowson Road signalised junction | Forecast to operate within capacity | Forecast to exceed capacity | Mitigation - SCOOT to be implemented at the traffic signal junction and funded by the Applicant. Details to be conditioned. |
| B6468 Market Street/Union Street signalised junction | Forecast to operate within capacity | Forecast to operate within capacity but with some queuing. | Mitigation - revalidation of SCOOT at the junction and a contribution towards SCOOT along the Market Street corridor. Details to be conditioned. |
| M67 Junction 3 westbound slip / A57 Market Street Priority junction | Forecast to operate within capacity | Forecast to operate within capacity | No mitigation required |
| Stockport Road / Joel Lane Priority junction | Forecast to operate within capacity | Forecast to operate within capacity | No mitigation required |
| A560 Hyde Road / Pennine Road signalised junction | Forecast to operate within capacity | Forecast to operate within capacity | No mitigation required |
| A560 Hyde Road/George Lane/Stockport Road East/ Redhouse Lane + Lower Bents Lane signalised junction | Forecast to operate above capacity in the am and pm peak periods | Forecast to operate above capacity in the am and pm peak periods | Mitigation to be proposed to address future capacity issues. To be conditioned. |
| A560/B6104 Stockport Road west signalised junction | Forecast to operate around capacity | Forecast to have modest increases in queues | No mitigation required |
| B6104 Stockport Road west / New Zealand Road / Carrington Road / New Bridge Lane signalised junction | Forecast to operate around capacity | Forecast to operate around capacity | No mitigation required |
| M67 Junction 1A off slip/A6017 Ashton Road signalised junction | Forecast to operate around / within capacity | Forecast to operate around / within capacity | No mitigation required |
| M67 junction 1A westbound on-slip / A6017 Ashton Road/Lance Corporal Andrew Breeze Way signalised junction | Forecast to operate within capacity | Forecast to operate within capacity | No mitigation required |

| | | | |
|---|---|---|--|
| M67 junction 2 westbound off slip / A57 Hyde Road signalised junction | Forecast to operate within capacity | Forecast to operate within capacity | No mitigation required. |
| M67 junction 2 westbound off slip / A57 Hyde Road signalised junction | Forecast to operate within capacity | Forecast to operate within capacity | No mitigation required. |
| M67 junction 3 eastbound off slip / Clarke Way signalised junction | Forecast to operate above capacity | Forecast to operate above capacity | Mitigation - SCOOT to be funded at the traffic signal junction. Details to be conditioned. |
| M67 junction 3 westbound off slip / Clarke Way signalised junction | Forecast to operate within capacity | Forecast to operate within capacity | No mitigation required. |
| Vissim modelling Denton Island M60 Junction 24 | Forecast to operate within capacity | Forecast to operate within capacity | No mitigation required |
| M67 Junction 4 Roundabout | Forecast to operate within capacity | Forecast to operate within capacity | No mitigation required |
| M60 Junction 25 Southbound off slip / A560 (Northern) Roundabout | Forecast to operate within capacity | Forecast to have modest increase in traffic queues. | No mitigation required |
| M60 Junction 25 Northbound on slip / A560 (Southern) Roundabout | Forecast to operate within capacity in the am peak but operate over capacity in the pm peak | Forecast to have modest increase in traffic queues. | No mitigation required |

12.27 Stockport Council has also objected on the basis that there are other junctions within Stockport that could be affected by the development and have not been modelled:

- A560 Stockport Road West / Stockport Road East / A6017 Lower Bents Lane / Hollingworth Road Signalised Junction
- A560 Stockport Road West / The Broadway / Morrisons Signalised Junction
- A560 Ashton Road roundabout

12.28 However, it is the view of consultees that the TA has comprehensively assessed the impact on the network as per the trips generated.

12.29 National Highways has confirmed that the proposed A57 Link Road scheme will look to bypass the nearby village of Mottram and offer capacity enhancements along the route, in particular at M67 J4. Although the scheme has been granted the Secretary of State, it is currently subject to judicial review, but it has been treated as a committed development for the purposes of the assessment here.

12.30 National Highways highlights that there are a number of sustainable measures proposed which would reduce the impact of the development on the surrounding road network. They are of the opinion that these help to reduce the need to travel and improve travel choice by enhancing and promoting more sustainable modes of transport. Having reviewed the TA, National Highways support the mitigation package that centres upon active travel enhancements, and comment that this approach accords with the recommendations within DfT Circular 01/20222 (Mitigating the Impacts of Development) of a vision-led approach to developments. They recommend that a travel plan be secured by condition and that they are involved in a future working group to monitor its outputs.

- 12.31 Chapter 8 of the NPPF highlights the important role of the planning system in creating healthy, inclusive communities which enable and support healthy lifestyles and promote social interaction. Para. 98 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. 100 requires planning decision to protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users.
- 12.32 UDP policy T8 seeks to secure safe and convenient pedestrian routes between residential areas. It also states that PRow will be protected where they fall within sites proposed for development. The needs for pedestrians must be taken into account in new development with an aim of encouraging modal shift.
- 12.33 Embedding sustainable travel options from the outset is essential to reducing reliance on the use of private vehicles. The site's location is favourable being accessible to public transport, an established footpath and cycle network and being within reach of established amenities within Hyde and Hattersley. Nonetheless, a series of improvements and investments are required to address accessibility needs and provide attractive travel alternatives for future residents.
- 12.34 The submitted Access and Movement Parameter Plan seeks to retain, upgrade and expand the provision of footpath provision within the site, this would include improvements to all existing PRow's within the site to both provide suitable connections within and between the two proposed villages, but also to existing connections to Hyde town centre, Hattersley and Werneth Low Country Park.
- 12.35 The provision of a new pedestrian and cycling bridge between the eastern village and Hattersley is perhaps the most significant of the planned infrastructure investments. This will provide direct and convenient access to both train and bus services to future residents of the site. The bridge is identified by the applicant to be delivered within phase 2 of the eastern village's development. It is accepted that there are logistical issues to be addressed in terms of its delivery and connectivity, nonetheless it is considered that the bridge should be delivered as early as possible, taking account of the need to embed into the development and the fact that the location means that it is not straight forward. Ultimately the delivery of the bridge will be secured as part of the overall infrastructure delivery but to compensate for any delay it is recommended that cycling and walking improvements are secured along the A560 and to Green Lane / Brookfold Lane as part of an initial phase of infrastructure works (i.e. prior to occupation of any dwellings). These improvements would be tied to the construction of the site entrances and secured within a phasing condition.
- 12.36 The proposed realignment of the TPT towards the eastern boundary would align the route to the amenities of the eastern village centre and connect to the route from Hattersley. Until the full realignment of the route, the cycling and walking improvements to Green Lane, A560 frontage will provide an improved safe and convenient passage for users. The TPT and Sustrans have both been supportive to the principle of the active travel improvements. In response to their concerns about the delivery date of the improvements this will be looked at as part of the overall phasing delivery of the infrastructure.
- 12.37 The retention and improvement to existing footpaths along with provision of additional footpaths, including a dedicated bridge crossing to Hattersley and realignment of the Trans Pennine Trail (TPT), is a significant benefit. The cumulative impacts of this network of routes would embed active travel/modal shift within the new community as well as embed cohesion with adjoining neighbourhoods.
- 12.38 Within the vicinity of the development, the TPT is also part of the National Cycle Network (NCN 62) and international long distance walking route (E8). A section of the NCN along A560 has recently been declassified from the network due to safety concerns. The realignment and improvement to the route along the eastern boundary will address current

issues and will enhance cycling and walking opportunities which would be of benefit to the wider area. The proposed network of new footpath and cycle ways through the site would also provide a safer connection for pupils between Hattersley and Alder Community High School. In a similar manner, access to Werneth Low Country Park would also be improved by virtue of improved links to Hattersley train station which would be secured from the proposed bridge, footpath/cycle network and proposed Pegasus and Puffin crossings to Mottram Road.

- 12.39 The submitted Design Code includes within the primary (mandatory) code, a commitment to upgrade the Green Lane, the present condition of which is poor. It is heavily potholed, badly drained with little to no street lighting. Green Lane forms an established link to existing communities and Werneth Low. The code states that the intention is to; 'retain and enhance Green Lane to create a more positive cycling and walking environment. This includes resurfacing work and potential drainage improvements in accordance with the strategic materials palette for the site and deliver measures to prevent "rat-running" along Green Lane whilst protecting existing residents' access'. Given the importance of Green Lane as both the principal access to existing residential properties and recreation throughfare for walkers, cyclists and horse riders, the improvements are welcomed and are a benefit of the proposals. The improvement would contribute positively to encouraging active travel where the works could be secured under an initial phase of infrastructure works.
- 12.40 Collectively, the associated community and access benefits associated with the TPT realignment, footpath and Green Lane improvements and the relationship to new and existing open and recreation space constitute a significant benefit of the scheme.
- 12.41 There are 9 recorded rights of way in addition to Green Lane and Brookfold Lane. Existing routes would be retained and incorporated into the development. Improvements to the existing PRow's is a benefit of the development, perhaps the most significant of these would be the proposed improvements to the TransPennine trail, which as identified would be diverted along an alignment through the eastern side of the site, this would be complemented with a dedicated Pegasus crossing across Mottram Old Road. All footpaths would be upgraded to include new surfacing, wayfinding signage, entry gates and drainage where appropriate. The phasing plan, masterplan and design code all give an indication of how this would be delivered and this would be in turn secured by a condition.
- 12.42 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 determined as part of subsequent reserved matters.
- 12.43 Overall the development presents a significant opportunity to improve active travel through the site. The improvement to the footpath and cycling network would improve connectivity between existing communities to Werneth Low Country Park, Hattersley Rail Station and the TPT
- 12.44 In terms of bus services, the TA identifies that the layouts within the site have been designed to accommodate bus movements. Access would be taken via separate internal 'looped' roads to the western and eastern villages, the scope for an internal highway connection between the two villages has been discounted on grounds of site constraints, which are mainly ecological and topographical in nature. It is essential that bus services are provided to the future residents of the development. At present Mottram Old Road is served with the 341 hourly service which runs between Hyde and Glossop a more frequent service would therefore need to be provided. It is accepted that the development will need to advance before bus services are likely to be commercially viable to operators. To address this, the applicant has committed to funding a service for an initial period of 5 years, this would be secured by condition which would be triggered before or upon the occupation of the 100th dwelling. Early review by TfGM's Operational Service Planning Team indicates a preference to extend the current 346 service from Hyde bus station. Further to funding services there

will be a requirement to fund improvement to existing bus stops along Mottram Old Road / Stockport Road as well as provide bus stop infrastructure within the site, matters again which would be addressed by a condition.

- 12.45 The LHA confirms that applications have been made for funding for infrastructure improvements within the immediate vicinity of the site. The applications have been made as part of Tameside's application to the City Region Sustainable Transport Settlement (CRTS), this includes Hattersley Viaduct improvements, cycling and walking improvements to the A560 corridor. The schemes are aligned to the mitigation measures detailed within the application and will secure significant local improvements to mitigate the reliance upon journeys being taken by private vehicles and promote active travel and support net zero targets, this is also aligned to the principles within paragraph 77(a) of the NPPF which states; a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains'.
- 12.46 In addition to the CRTS bid, the LHA has identified the need to provide high quality active travel upgrades/provisions from the development to Stockport MBC's boundary and link to the existing cycling/walking infrastructure within the Borough, to promote sustainable modes of transport and reduce vehicle journeys. A scheme is currently being developed along Stockport Road/Dowson Road, which has the potential to provide 1.8 km of active travel infrastructure along this corridor and potentially funded through the Phase 2 of the Active Travel Fund (ATF2) and Capability and Ambition Fund (CAF). if successful, this will contribute positively to active travel and would be complemented by initiative proposed from the development.
- 12.47 In terms of parking this is not a matter relevant to the consideration of the outline application. Car and cycle parking would be expected to meet the adopted standards, this would be looked at as part of the details of future reserved matters applications.
- 12.48 To manage construction traffic throughout the development process, a phasing plan and construction management plan (CMP) could be secured via condition. The condition would look to minimise disruption upon the highway network, this would include the measures to ensure the routing of HGVs from the east to avoid Gee Cross centre and Alder Community High School. This would address all logistical matters relevant to the development, the CMP would be revisited throughout subsequent phases/reserved matters applications.

Conclusion on Highways, Transportation and Access

- 12.49 The TA and ES appropriately consider the transport implications of the development. The operational results have been compared to the baseline to establish the effects of the development to the satisfaction of technical consultees. The comprehensive mitigation package provided responds to the identified impacts and results in residual effects that are negligible or minor adverse.
- 12.50 Measures to promote and implement active travel are welcomed and are a benefit of the development. Enhancement of existing rights of way, including the TPT, the provision of a new bridge to Hattersley and crossings to Mottram Old Road, mean as that there would be enhanced connectivity to the area more generally. The cumulative impacts would drive improved connectivity of existing communities in addition to future residents of the development. The network of public footpaths would also connect with train stations and bus stops which will encourage sustainable travel. The overall benefits are a considerable benefit of the development.
- 12.51 It is recognised that considerable public objections have been made to the development on grounds of additional traffic and the impact on the local and strategic highway network. However, the site is well located in terms of access to public transport, the strategic highway network and established walking and cycling network. A comprehensive mitigation package of highway improvements has been proposed which not only mitigates against associated

impacts of the development but also secures significant improvements to the benefit of all highway users within the locality. The proposals have been met with the support of the LHA, TfGM and National Highways, subject to the imposition of conditions the development would not have a significant impact upon the highway network.

- 12.52 In addition, correspondence from Stockport MBC sets out a number of concerns regarding the highways and transportation impact of the development in Stockport. However, these comments do not relate to the most up to date information. It is the case that other statutory and non-statutory consultees on highways matters have no objection to the development subject to conditions.
- 12.53 The development would not have an unacceptable impact on highway safety nor would the residual cumulative impact on the highway network be severe. The proposal would generally comply with UDP policy T1 and the NPPF. However, although the benefit of improvements to active travel measures are recognised, there will still remain a relatively minor adverse impact on the highway network as a result of the development. As such, limited harm should be attributed to this factor in the planning balance.

13. LANDSCAPE AND VISUAL IMPACT

Applicant's case

- 13.1 The applicant has submitted a landscape and visual impact assessment (LVIA). This has assessed and identified 24 short, medium and long-range views which have the potential to be influenced by the development proposals. Beyond these identified areas, the development would be located too far away to have a significant or discernible impact upon landscape character. The impact upon each of these areas has been considered. It is important to note that residents are not entitled to a view; it is the impact of the proposed change and whether the visual effects of the development are harmful at the identified properties/receptors that must be considered.
- 13.2 Out of the 24 views which have been assessed within the LVIA, 3 views are considered to have 'high sensitivity'; 17 views have 'medium sensitivity' and 4 views 'low sensitivity'. The Design and Access Statement states that this is due to the factors including, but not limited to the substantial site area, the accessibility of the site, varied topography and existing landscaping.
- 13.3 Following the process established in the LVIA Methodology, only effects which are deemed to be 'moderately significant' and 'significant' are considered to be relevant within the meaning of EIA Regulations (2017).
- 13.4 The LVIA identifies that the construction phase will have several effects, which are temporary in nature. These will be mitigated by embedded measures within the construction process, using a phased approach, landscape screening, site hoarding and the positioning of site compounds close to site access.
- 13.5 Further assessment within the LVIA identifies that the operational phase will produce several beneficial changes to both landscape and visual receptors. These include beneficial changes to movement and linkages due to the proposed networks which would form part of the development, such as those for multi-users, and existing routes through the site would be retained and upgraded where required. These would encourage use of sustainable modes of transport and would act as a 'stepping stone' between the existing urban edge and the surrounding rural areas. There would also be beneficial changes to environmentally designated areas and open space, with a comprehensive green infrastructure network proposed as part of the development. Whilst existing environmentally designated areas will be retained and protected, new ponds for sustainable urban drainage systems (SUDS) and habitat potential will be created. Furthermore, the creation of new green infrastructure will

include new open spaces, supporting the health and wellbeing of future residents and users, as well as new areas of ecological enhancement, will contribute to raising the habitat and biodiversity potential within the site.

- 13.6 The LVIA considers that there would be beneficial changes to identified site landscape character areas 2 (Western Fields), 4 (Central Fields), and 6 (Eastern Fields). The extent of development would transform these areas of the development site from rural in character to developed. However, the sensitive approach to development, supported by movements, wider linkages and green infrastructure would result in a beneficial change during the operational phase. The LVIA also considers that there would be a beneficial change to a total of 8 views across the site as a result of the development.

The Council's assessment

- 13.7 Paragraph 126 of the NPPF states that the creation of high quality, beautiful and sustainable 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.
- 13.8 Paragraph 130 of the NPPF states that planning decisions should ensure that, amongst other things, developments are:
- b) visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - c) 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);
- 13.9 Paragraph 134 states that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:
- a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or
 - b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.
- 13.10 Policy C1 of the Tameside UDP 2004 requires proposals to respect the distinct settlement pattern, open space features, topography, townscape and landscape character to be understood and the nature of the surrounding fabric to be respected.
- 13.11 Policy H10 of the UDP establishes criteria for the detailed design of housing developments and requires proposals to provide an attractive, convenient and safe environment for the local community, and complements or enhances the character and appearance of the surrounding area.
- 13.12 Policy OL10 of the UDP requires developments to maintain the landscape quality of the borough, with a requirement to be sympathetic to its surroundings to its surroundings and utilise high standards of siting, design, materials and landscaping will be expected.
- 13.13 Policy OL16 of the UDP relates to the Peak District National Park. It states that the Council will not permit development that would adversely affect the purposes of the Peak District National Park or be harmful to its valued characteristics.
- 13.14 It is the case that there would be a degree of harm during the construction phase. However, the temporary nature of the impacts are accepted such that appropriate mitigation measures to screen and minimise such impacts can be secured by conditions.

- 13.15 Having regard to the natural terrain and topography of the site, it benefits from a natural level of obscurity which reduces the visual impact from key perspectives including Mottram Old Road. The site slopes downwards significantly toward Godley Brook and features peaks and troughs which will be reflected in the final development. Significant sections of the site are obscured from view from Mottram Old Road, by hedgerow planting and woodland. Similarly views within the site would be broken by woodland, hedgerows and changes in topography. Sections of the eastern village would have a prominent appearance from the highway given the open views across the site. The undulating nature of the site would also result in some sections of the development being visible above the highway; however further west along Mottram Old Road (across the Western Field section), the site slopes significantly away from the highway and therefore the prominence of development would be reduced. Large sections of the western village would be screened from the highway on account of the fall in levels, and the influence of Green Lane (and its associated properties) and Alder Community High School. The details of the proposed landscaping and specific design features are a matter to be finalised through subsequent reserved matters applications, however, natural green buffer zones will create separation from vantage points and will help to mitigate the overall visual impact of the development.
- 13.16 Beyond the northern and western sections of the site, bordering Hyde, are relatively modern housing estates, situated to the south of Mottram Road and to the west of Grange Road South. These housing estates are grouped and separated by clusters of landscaping and wooded areas. This established form of development would be replicated through the site, with the Design and Access Statement indicating that a similar form would be followed. The submitted Design Code establishes the vernacular of Garden Village principles, and this would ensure that the external form and design of the development responds appropriately to the environmental setting.
- 13.17 The development, once built, will integrate with the existing built environment of Hattersley and Hyde from the perspective of Werneth Low. Comparison in this regard can be taken with how adjacent housing settlements are embedded into the landscape. The development will also benefit from green infrastructure and the retention of existing landscape features such as ancient woodland, and sites of biological interest (SBI's). These features will provide defensible boundaries and a semi-rural context. Indicative visuals and supplementary plans show the lower density nature of the settlement alongside the general topography of the site.
- 13.18 A development of the scale proposed would have an urbanising impact, and in turn a lasting legacy, in contrast to the established rural nature of the existing form. However, this will, at least in part, be mitigated by established mature landscaping that would be retained as well as new landscaping features to be created. The Design Code establishes the vernacular of Garden Village principles throughout the site, which are of a considered standard. As detailed within the Design and Access Statement, the development would include the retention of significant areas of on-site open space provision, and the further landscaping proposed would provide further benefits.
- 13.19 As stated earlier, only effects which are deemed to be 'moderately significant' and 'significant' are considered to be significant in the meaning of EIA Regulations (2017), and of the 24 views across the site identified within the LVIA, 3 were identified as 'high sensitivity'. This impact, combined with the magnitude of the proposed development transforming the landscape from a rural to an urban setting is considered to result in a significant impact upon the site and its surroundings. However, as noted the retention of on-site open space and established mature landscaping would assist in mitigating against this impact. The development thereby would assimilate into its surroundings, even from an early stage of the development due to the retention of existing mature landscaping and open space features which would envelope new development.

13.20 On balance though, it is considered that the development proposals would create a moderately harmful impact overall on the site and its surroundings, with due regard given to the above local policies and the NPPF.

14. AIR QUALITY

Applicant's case

14.1 Chapter 13 of the ES and the subsequent addendums assess the effects of the proposed development on air quality. In particular, it sets out the potential effects of construction phase dust and operational phase road traffic emissions on air quality at existing receptor locations, as well as the potential exposure of future residents to existing air quality issues.

14.2 In terms of the construction phase, the use of appropriate mitigation measures, as detailed in the Institute of Air Quality Management (IAQM) guidance on the assessment of dust from demolition and construction, in the form of a construction environment management plan (CMP) is proposed. The CMP would ensure that best practice measures are employed throughout the construction period, this could include the use of water sprinklers to dampen materials, dedicated storage areas for materials, specific parking and delivery routes and the covering of any loose material being transported off site. The application of CMP is recognised as being an effective control on the release of fugitive dust emissions during all phases of the development. These mitigation measures are appropriate and would be secured by a planning condition which would be reviewed upon subsequent reserved matters applications.

14.3 In terms of operation, the applicant states that any new development that leads to an increase in vehicle movements will have an adverse impact on air quality. The submission sets out to determine the significance of this impact and if it would lead to any potential breaches of the air quality objectives for nitrogen dioxide and particulate matter (PM₁₀).

14.4 The Air Quality Assessment (AQA) has modelled the associated air quality impact across 38 receptors sites. The results of the dispersion modelling assessment indicate that the impact of annual mean nitrogen dioxide concentrations are predicted to be slight at one receptor and negligible at the remaining receptor locations. Across all receptor sites particulate matter impacts were assessed as being negligible.

14.5 Overall, the AQA concludes that the air quality impact of the development on the local area is predicted to be negligible and that there would be no significant effects. The report concludes that no further mitigation is required other than those already embedded within the development proposals, including active travel measures, electric charging points to all properties, on site amenities and access to the public transport network.

The Council's assessment

14.6 Paragraph 186 of the NPPF states that planning policies and decisions should sustain compliance with and contribute towards relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas (AQMAs) and the cumulative impacts of air quality 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.

14.7 National Planning Practice Guidance (NPPG) (para 001) advises that the Ambient Air Quality Directive 2008 sets legally binding limits for concentrations in outdoor air of major air pollutants (EU limit values) that impact public health such as particulate matter (PM₁₀ and PM_{2.5}) and Nitrogen Dioxide (NO₂). As well as having direct effects, these pollutants can combine in the atmosphere to form ozone. Dust can also be a planning concern, for example, because of the effect on local amenity.

- 14.8 Poor air quality can have significant health impacts, and this is reflected in the EU Limit Values referred to above. The limit values are annual mean concentrations of 25µg/m³ (micrograms per cubic metre) for PM_{2.5} and 40µg/m³ for both PM₁₀ and NO₂. The annual mean should be applied at locations where members of the public might regularly be exposed, such as the building facades of residential properties, schools or hospitals. If the pollutant level is below the EU Limit Values, then it is largely regarded that there is an acceptable impact on health.
- 14.9 The NPPG states that air quality may be relevant to a decision if the development is likely to have an adverse effect on air quality in areas where it is already known to be poor, particularly if it could affect the implementation of air quality strategies and action plans and/or breach legal obligations (including those relating to the conservation of habitats and species).
- 14.10 Policy MW14 states that when developments are proposed which could have a significant impact on local air quality, The Council will consider the extent to which the development may affect the target levels in any AQMA which are declared of the requirements of related action plans, and weigh this against other material considerations before granting planning permission.
- 14.11 The methodology has been reviewed by the Air Quality officer who is satisfied that it complies with current guidance issued by the Institute of Air Quality Management (IAQM) and the Department for Environment, Food and Rural Affairs (DEFRA). The Air Quality officer is satisfied that the assessment is technically sound, within the consultation response commenting that; 'The background concentrations used in both the assessment of the impacts of traffic and the potential impacts of fugitive dust released during the construction phase of the development are correctly sourced from the DEFRA Local Air Quality Management website and the Council's own published air quality monitoring data'.
- 14.12 The construction phase is scheduled to be undertaken across many years. Potential impacts include dust arising from earthworks, demolition, material transportation, vehicle movements with (associated dust being tracked). These circumstances are not particularly unique to any construction process, air quality issues can be significantly influenced by weather conditions, sensitive receptors may include residents within areas around site entrances.
- 14.13 The application site is not within an air quality management area (AQMA). There are, however, sections of highway in Hyde, Hattersley and Mottram which are designated AQMAs, where consideration of traffic impacts within these areas is important.
- 14.14 The applicant's air quality assessment has been reviewed by the Council's Air Quality officer who agrees with the conclusions. Whilst air quality would deteriorate in the vicinity of site during the construction and operational phases, it would not be significant and would comply with the requirements of the NPPF and UDP. However, as an adverse impact would result, limited harm is afforded to air quality matters in the planning balance.

15. NOISE

Applicant's Case

- 15.1 The ES includes a noise assessment, supported by technical notes that reviews the noise and vibration impact of the construction phase and operational phase of the proposed development as well as the suitability of the site for residential development. The assessment accounts for all existing receptors in the immediate vicinity of the site that may be subject to noise and vibration from construction and operational activities as well as existing receptors that are located along any affected highways that are subject to a significant change in traffic flows. In addition, the assessment covers all proposed residential receptors associated with the development.

- 15.2 The noise assessment notes that during the baseline surveys, noise generated by road and rail traffic currently dominate the noise climate across the site. Noise surveys were undertaken during the COVID-19 pandemic, but during a period when lockdown restrictions were eased. The applicant considers that the measured data is representative.
- 15.3 The applicant states that it is inevitable with any major development that there would be some disturbance caused to nearby receptors during the clearance and construction phases. However, this is temporary, limited to the parameters of the site, and is of a medium-term duration. Some periods and methods of construction would have greater noise intensity than others, for example earthworks are likely to be extensive.
- 15.4 Some receptors, based on their location, are considered of a higher sensitivity than others, such as residential development off Green Lane or Mottram Old Road. The applicant states that those that would be worst affected by construction works are likely to be only impacted upon in the short term, with a short operational duration of construction works within a particular area of the site. Although construction works would take place over a longer period over the whole site, activity would move to thus taking place at a greater distance to sensitive receptors and reducing the significance of disturbance.
- 15.5 Construction generated road traffic noise, in the form of HGV vehicles and cars and vans carrying construction workers and materials would have potential impacts in relation to noise. Vehicles would arrive into the site from roads that have significant baseline flows (such as Mottram Old Road). The volume of construction traffic would make up a progressively lower proportion of the overall traffic volumes as the site is developed, with overall volumes anticipated to be the highest upon completion. Construction traffic is considered to be limited to daytime hours only, when background noise levels are higher, and therefore reducing the impact upon nearby sensitive receptors.
- 15.6 The applicant has reviewed the long-term change in road traffic noise by comparing the anticipated completion of the development from the TA (2040) against a position where no development occurs. The assessment concludes that there would be a maximum change of 2.4dB along the A560, and that there would be a negligible adverse impact along all affected roads. It is not considered that the long-term effects from road traffic noise associated with the general site operations would be detrimental.
- 15.7 Although the proposal is in outline, and the detailed layout would be determined at reserved matters, a number of recommendations are made within the Noise Assessment to ensure that individual plots and their garden areas are positioned and orientated in order to reduce noise disturbance for future occupants. Due to background noise levels being primarily linked to traffic and railway noise, acoustic design measures in the construction of residential properties would need to be employed in order to ensure no undue disturbance to future occupants.
- 15.8 The applicant states that the impact of the proposed commercial centres cannot be accurately determined at this outline stage. However mitigation measures can be employed, for example limiting plant noise emissions levels, in order to ensure no undue noise and disturbance to both future and existing occupiers. Similarly, any sports facilities would need to be designed in a manner to reduce noise impacts upon sensitive receptors, and use mitigation measures where necessary, such as acoustic fencing and hours of use restrictions.

The Council's Assessment

- 15.9 Paragraph 185 of the NPPF states that planning decisions should 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 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 as set out in the Noise Policy Statement for England.

- 15.10 The NPPG states that local planning authorities' decision taking should take account of the acoustic environment and in doing so consider: whether or not a significant adverse effect is occurring or likely to occur; whether or not an adverse effect is occurring or likely to occur; and whether or not a good standard of amenity can be achieved.
- 15.11 A significant observed adverse effect level is defined as the level of noise exposure above which significant adverse effects on health and quality of life occur. At this level, the NPPG states that the noise causes a material change in behaviour and/or attitude, e.g. avoiding certain activities during periods of intrusion; where there is no alternative ventilation, having to keep windows closed most of the time because of the noise. The NPPG states that there is potential for sleep disturbance resulting in difficulty in getting to sleep, premature awakening and difficulty in getting back to sleep, and that quality of life is diminished due to a change in the acoustic character of the area. The NPPG states that this level of impact should be avoided, and that any impacts below this level should be mitigated and reduced to a minimum.
- 15.12 The NPPG states that local planning authorities' decision taking should take account of the acoustic environment and in doing so consider: whether or not a significant adverse effect is occurring or likely to occur; whether or not an adverse effect is occurring or likely to occur; and whether or not a good standard of amenity can be achieved.
- 15.13 Policy MW12 of the UDP states that planning permission will not be granted for a development if its operation is likely to be a source of pollution (including noise pollution). Where appropriate, conditions will be attached to planning permissions to safeguard against the loss of amenity which may be caused by pollution resulting from the operation of a development, or to establish acceptable levels which should not be breached. Where developments are permitted, any emissions may be monitored to ensure compliance with conditions which are imposed.
- 15.14 In general, the submission has been reviewed by Environmental Health who consider the methodology and conclusions of the submitted assessment to be acceptable. It is accepted that the background noise survey was undertaken during the covid-19 pandemic and as such, background levels were likely to have been lower than at present. As the difference between background and predicted levels are likely to be less than in the assessment, the approach is considered to be acceptable.
- 15.15 Noise associated with the construction phase of the development has been assessed, and although there is the potential to result in adverse effects, use of mitigation measures would minimise these impacts upon sensitive receptors. These could include programming deliveries to take place during normal working hours, situating plant so that noise impacts upon sensitive receptors are minimised, and fitting pneumatic tools with silencers or mufflers, for example. These measures could be controlled through a construction environment management plan, which would be agreed prior to works commencing. Other mitigation measures could be employed to ensure construction vibration levels are kept to a minimum, for example through regular monitoring of on-site vibration levels, adoption of low vibration working methods, and removal of any ground obstructions when undertaking piling works, for example. Crucially, it is noted that the impacts of noise during the construction phase would be temporary in nature.
- 15.16 Post construction, it is anticipated that road traffic would increase due to the redevelopment of the site and would be the main source of noise as a result. At that time, the development would be fully established, and reasonable levels of noise from general operations and movements within the site would be expected. Furthermore, the development of the site would be gradual, and therefore the increase in traffic levels would be progressive.

- 15.17 The impacts of noise during construction works has been assessed, and although these have the potential to result in adverse effects, the use of mitigation measures to be controlled via the use of conditions would minimise these impacts. Further, it is noted that such impacts would be temporary in nature. Longer term, once built, careful consideration of the layout of the site at reserved matters stage would be necessary, in order to ensure that noise impacts upon existing sensitive receptors from commercial uses, sports uses and operational traffic are limited. The careful consideration of future layout would also ensure future occupiers are not unduly affected by background noise levels, and appropriate mitigation could be considered where necessary.
- 15.18 The noise impacts of the development would have a limited impact upon sensitive receptors, due to the level and length of construction activity, however, these impacts would be minimised against through mitigation measures and the temporary period associated with construction works. Detrimental operational noise impacts of the development could be adequately mitigated at the design stage. Notwithstanding this, given the anticipated construction period and the overall transformational change of the developed site, with its associated activity, in comparison to the current undeveloped and largely agricultural use, there would invariably be an increase in noise arising from the site. This adverse harm should attract limited weight in the planning balance.

16. LIGHTING

Applicant's case

- 16.1 The applicant has examined the current lighting environment, which was found to be consistent with a rural environment or dark outer suburb. They say that lighting of the proposed development should be appropriate for this environment and not adversely affect receptors that are sensitive to lighting. The assessment includes lighting surveys and modelling of the lighting layout in sensitive areas of the site, such as adjacent to existing residents and ecological features such as ancient woodlands or potential bat roosts.
- 16.2 The applicant states that the lighting impact on residential receptors would not be significant if best practice guidance is followed during the design phase. There is the potential for a small impact on ecological receptors during the construction phase. However, this is a temporary effect and would be avoided as far as possible through implementation of a construction lighting management plan.

The Council's assessment

- 16.3 Paragraph 185 of the NPPF states that planning decisions should ensure that new development is appropriate for its location taking into account the likely effects on pollution and health, living conditions and the natural environment as well as the sensitivity of the site or wider area to impacts that could arise from the development. They should limit the impact of light pollution from artificial light on local amenity.
- 16.4 Policy MW12 of the Unitary Development Plan states that planning permission will not be granted for a development if its operation is likely to be a source of pollution (including noise pollution). Where appropriate, conditions will be attached to planning permissions to safeguard against the loss of amenity which may be caused by pollution resulting from the operation of a development, or to establish acceptable levels which should not be breached. Where developments are permitted, any emissions may be monitored to ensure compliance with conditions which are imposed.
- 16.5 The submitted information assesses the potential impacts and likely residual effects due to artificial lighting across the site, both during the construction phase and operational phase of the development. Although the final form of lighting would be developed following a grant of planning permission, the submitted information includes indicative details which are representative of a typical scenario. The proposed development would require artificial

lighting for the sake of safe passage (by pedestrians and vehicles for example), health and safety, security and amenity. Such artificial lighting, particularly if poorly designed, has the potential to result in adverse environmental effects I.e. light pollution, or obtrusive light.

- 16.6 During the construction phase, there would likely include task lighting at height (in order to allow construction to take place), lighting of the contractor compound areas, security lighting and car park lighting. This has the potential to cause light intrusion to residential properties, upward light (causing 'sky-glow') and light spill on ecological receptors. In addition, it also has the potential to cause glare to highway and railway receptors. On-site working hours would likely be limited to typical hours, and therefore night time works are unlikely to be required, however during winter months the hours of darkness may create a noticeable change for local residents and ecological receptors. Light levels would only be increased for short periods of time whilst works are undertaken during hours of darkness, and would be temporary and short term. Further, construction is planned to be undertaken in phases, which would reduce the extent of temporary lighting in one location for the duration of the works. Although the construction phase would cause light intrusion to those areas which have direct views of the proposed development site, these effects can be controlled to limit the most potentially disruptive, and would only be temporary in nature. Light glare is less likely to affect existing residential properties, due to the distances involved from the development area. However, construction lighting is likely to be of a higher lumen output to provide good levels of working conditions and security on site, and therefore may further affect residential properties; however as noted above such lighting would be temporary in nature.
- 16.7 Sky-glow during construction works has the potential to affect wider areas. Floodlights are often angled with a significant uplift angle, and typical festoon, bulkhead and strip lighting, by nature of their design, typically has a high upward light component. The sky-glow effects during construction are considered to be moderate, however this impact is considered to be reduced by the temporary nature of the works. Light spill would likely impact upon species which utilise areas within close proximity for night-time commuting and foraging, however this impact would be temporary in nature, and would impact certain areas only for the periods during which it is in use.
- 16.8 Construction work has the potential to affect glare of highway and railway receptors, however due to the longer distances involved, the effects would be somewhat limited. However, construction lighting details have not been confirmed at this stage, and therefore as a worst-case scenario it is considered that the lighting could adversely affect such receptors.
- 16.9 A number of mitigation measures are recommended to be employed during the construction phase, including designing lighting to meet relevant British Standard levels and ensuring areas are not 'over-lit', switching off lighting when not in use, use of security lighting only for strategic areas which require it, and use of shields and cowls to ensure appropriate distribution of lighting. Furthermore, lighting would be directed away from ecological receptors, and light spill beyond the development site would be minimised by avoiding poorly sited lights on or close to the site boundary. These measures would be stipulated and controlled through appropriate use of conditions, and it is considered that the associated light intrusion / light spill, glare and sky-glow impacts would be minimised through the identified mitigation measures.
- 16.10 Assessing the impacts of lighting during the operational phase of the development (post construction), light intrusion from the development would not significantly impact upon the light receptors of existing residential properties, due to the predicted light levels used at this stage. Although the cumulative volume of lighting would be significant, it is likely that LED lighting would be utilised for street lighting, which is directed to a particular area of the highway, and lighting on individual residential properties would be primarily focused upon their garden areas. Lighting proposed to commercial premises would likely be more prominent, however it is not considered that this would unduly affect existing residential properties. Use of shields and cowls on the permanent lighting would also assist in reducing

the impact upon surrounding residential properties, whom the majority of are already affected by lighting close to their properties, and the lighting would likely be designed to appropriate British Standards. The proposed lighting, when combined with mitigation measures discussed above and considering that surrounding properties are already affected by lighting, would have only a limited impact upon neighbouring properties.

- 16.11 Cumulatively, 'sky-glow' impacts of lighting and 'light spill' from the site are considered to be limited in their long term impact during the operational phase of the site. The overall development would lead to an urbanising impact of the site, which would fit with some of the existing surroundings. Furthermore, the nature of the development, retaining and introducing landscaped areas, woodlands and cloughs, would result in proposed lighting being dispersed across the site, further reducing its overall impact.
- 16.12 It is considered that associated glare impacts upon highway and railway receptors would only have a limited impact during the operational phase of development, as mitigation measures such as those discussed earlier could be employed in order to reduce any adverse impacts. Similarly, the impact of operational lighting upon ecological factors could be controlled and directed away from sensitive areas.
- 16.13 In conclusion, the impacts of the lighting proposed during construction works has been assessed, and although these have the potential to result in adverse effects, the use of mitigation measures to be controlled by conditions would minimise these impacts. Crucially, it is noted that such impacts would be temporary in nature. Longer term, details of appropriate lighting would be required to be submitted prior to installation during the operational phase of the development, and would be assessed to ensure the impacts of this are limited in their impact, through use of mitigation measures and lower light intensities than those required during the construction phase. As discussed, neighbouring residential properties would already reasonably expect light from existing surrounding uses, and the sky-glow effect of the development would be cumulative with surrounding existing development, reducing its overall effect on the environment.
- 16.14 Accordingly, the development lighting would not have a significant adverse impact upon neighbouring residential properties including sky-glow and light spill. Other matters such as highway, railway and ecological impacts could also be mitigated, subject to the implementation of appropriate conditions. The development complies with the relevant national and local planning policy. Nonetheless, as a result of the increased developed area and urbanised environment, lighting would be increased, and this would in comparison to the current agricultural environment, result in a moderate adverse weighting in the overall planning balance.

17. CONCLUSION ON OTHER HARM

- 17.1 In summary, the development would not have an unacceptable impact on highway safety nor the highway network in addressing policy requirements. However, there would still remain a relatively minor adverse impact on the highway network and this harm should attract limited weight in the planning balance.
- 17.2 Further, whilst careful consideration has been given to the landscape impacts of the proposal, including a range of mitigations which will assist in blending the development into the landscape over time, the landscape has a high degree of sensitivity and there will remain longstanding harm as a result of the proposal, harm which should attract moderate weight in the planning balance.
- 17.3 Issues of air quality have been acceptably assessed in accordance with current guidance. The application site is not within an air quality management area, although there are areas

locally which are. Air quality would deteriorate in the vicinity of site, particularly during the construction and operational phases, but it would not be significant and would comply with the requirements of the NPPF and UDP. However, an adverse impact will remain, and this harm should attract limited weight in the planning balance.

- 17.4 The noise impacts of the development have been adequately assessed, having a limited impact upon sensitive receptors, due to the level and of construction activity, however, these impacts would be minimised through mitigation and the temporary nature of construction activity. That said, given the length of time of the construction period and the overall transformational change of the developed site, compared to existing uses, there would remain an increase in noise arising. This harm should attract limited weight in the planning balance.
- 17.5 The introduction of lighting into this rural location will have an impact on residential properties in the vicinity as well as sky-glow and some light spill. And other matters such as highway, railway and ecological impacts can be mitigated. However, it remains, there would be an increase in urbanised lighting in comparison to the current agricultural environment which would be harmful. This harm should attract moderate weight in the overall planning balance.

18. OTHER CONSIDERATIONS

- 18.1 Paragraph 148 of the NPPF requires analysis of other considerations in the planning balance. These are set out below.

19. HOUSING

Policy Context

- 19.1 UDP Policy H1 Housing Land Provision, sets a housing requirement for an average of 370 new dwellings per year, net of clearance, to be provided April 2002 to March 2011 inclusive. The target set in the policy is therefore time expired.
- 19.2 Of relevance is NPPF paragraph 61 which advises that

'To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.'

Therefore, the Framework is deferred to by way of seeking to establish an appropriate figure for local housing need (LHN). NPPF Annex 2 defines local housing need as:

'The number of homes identified as being needed through the application of the standard method set out in national planning guidance...'

- 19.3 The Council's assessment of its five-year deliverable supply is set out in its Strategic Housing and Economic Land Availability Assessment (SHELAA) as required by paragraphs 68 and 74 of the NPPF. The Council is not currently able to demonstrate a five-year deliverable supply of land for housing. UDP Policy H2 Unallocated Sites is of relevance and states that

'Residential development on greenfield land which is not specifically allocated for this purpose in the plan will not be permitted unless an adequate five-year supply is no longer

available through outstanding commitments and remaining allocated sites, inclusive of an appropriate allowance for brownfield windfalls.'

- 19.4 Further, given the scale of the application, NPPF paragraph 73 is of particular relevance, in that

'the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes).'

Evidence

- 19.5 The Tameside SHELAA 2022 sets out the supply of land for housing and economic development for the period 1 April 2022 to 31 March 2037. The SHELAA has identified land with the potential to deliver 6,575 net additional dwelling for this 15-year period demonstrates that the council has 3.3 years' worth of supply for the five-year period 2022 to 2027.
- 19.6 The Tameside Housing Delivery Test Action Plan 2022 sets out the results of the government's Housing Delivery Test (HDT) measurement. This sets out that Tameside met 91% of the HDT requirement and as such is required to prepare an action plan in line with NPPF paragraph 76, as published on the Council's website.

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- 19.7 Paragraph 1.36 of the above states that a key objective of the Plan is to meet local housing need, using the Government's standard methodology. Policy JP-Strat6: Northern Areas seeks to increase the competitiveness of the northern areas including making best use of previously developed brownfield land. The plan further identifies that the baseline land supply will be complemented by the allocation of sites for development identified in chapter 11 of the plan, on sites which are currently within the designated Green Belt. This is because land in the urban area alone is insufficient to provide an adequate long-term supply to meet development requirements with sufficient choice and flexibility.
- 19.8 Policy JP-H1 Scale, Distribution and Phasing of New Housing Development sets out the phasing of targets for each of the 9 PfE districts. The targets for Tameside are shown in the table below:

| | Annual Average | 2022-25 | 2025-30 | 2030-39 | Total |
|------------------------|-----------------------|----------------|----------------|----------------|--------------|
| No of dwellings | 485 | 236 | 485 | 568 | 8,245 |

- 19.9 In addition, Policy JPA 31 Godley Green Garden Village, identifies the majority of the application site as consistent with the plans overall spatial strategy, objectives and site selection criteria and therefore an appropriate location to deliver around 2,350 new homes.

Applicant's case

- 19.10 The applicant identifies the Government objective to significantly boost the supply of homes (paragraph 60 NPPF); that policy H1 of the UDP should be considered out of date for the purposes of decision making; and that there is currently no adopted housing target for Tameside.
- 19.11 The submitted Planning Statement notes that the council is seeking to address its housing requirement in accordance with the NPPF through PfE and that across the plan period, Tameside has an identified local housing need requirement of 9,870 dwellings which equates to 658 dwelling per annum.

- 19.12 However, the applicant also notes that PfE seeks to redistribute the housing requirement across the 9 Greater Manchester authorities rather than requiring each district to meet their own needs in full. This results in an annual average target for Tameside of 497 dwellings or a total of 7,459 dwellings over the plan period. This results in a shortfall of 3,295 dwellings against the local housing need (as per the standard method), or a shortfall of 884 against the proposed PfE housing target.
- 19.13 The applicant's Planning Statement notes that Tameside has 5 year housing land supply of 3.1 years, which is a significant shortfall against its requirements. They say that there is clearly an urgent need for housing and the delivery of the application site.
- 19.14 The applicant's Planning Statement identifies what it considers to be a realistic and achievable trajectory of delivery of 475 dwellings within the next 5 years. Paragraph 7.80 states that this would have a significant beneficial impact on the council's short-term five-year housing land supply. The applicant goes on to identify that notwithstanding this, even if the proposed development were not to occur as envisaged, the site would still significantly boost long term supply.
- 19.15 The applicant does not consider the Written Ministerial Statement of December 2015, relating to unmet housing need outweighing harm to the Green Belt and any other harm to establish very special circumstances exist, should carry any weight, given that it has not been incorporated into the NPPF, despite there being several revisions of this in the intervening period.
- 19.16 The applicant gives 'very substantial' weight to housing delivery as the council is unable to provide sufficient sites to meet its long-term housing requirements and at 3.1 years is unable to demonstrate a 5 year housing land supply. The proposed delivery of up to 2,150 dwellings at this site would significantly boost the supply of housing. In addition, the existing and emerging evidence demonstrates that this is the only suitable strategic site within Tameside to meet long-term housing need. They say that very substantial weight should be ascribed as a result.

The Council's assessment

Policy

- 19.17 It is agreed that the requirement of 370 new dwellings per annum identified in UDP policy H1 is time expired and that it is appropriate to use the standard method for calculating the minimum annual local housing need (LHN).
- 19.18 The SHELAA in 2022 shows that Tameside's LHN was calculated to be 658 dwellings per annum. This has since been superseded and is now calculated to be 681 dwellings per annum. This follows the release of new government data in March 2023. This is not considered by the applicant but is reflected in the discussion below and will also be incorporated into the next iteration of the SHELAA.

Long Term 15 Year Housing Land Supply

- 19.19 The SHELAA 2022 identifies 316 sites as having development potential and the capacity to deliver a total of 6,575 net additional dwelling over the 15-year period 1 April 2022 – 31 March 2037. This does not include the proposed allocations for residential development in PfE Tameside Paragraph 3.45 states that

'All sites within the adopted Green Belt will not be considered suitable for development given the very strong protection afforded them in national policy, with the exception of those sites with an extant planning permission.'

Short Term Housing Land Supply

- 19.20 In accordance with paragraph 74 of the NPPF, the council annually identifies and updates its supply of specific deliverable sites sufficient to provide a minimum of five years' worth of

housing supply when compared against its housing requirement with an additional buffer applied depending on local circumstances. For a site to be included within years one to five of the plan period, NPPF paragraph 68 requires that the site be deliverable. NPPF Annex 2 defines the term deliverable and states that a site should be available now and have a realistic prospect of being delivered within 5 years. Section 4 of the SHELAA sets out that the deliverable supply for the five-year period 2022 to 2027 is 2,267 net additional dwellings.

- 19.21 Section 5 of the SHELAA sets out the calculations necessary to determine the five-year housing land supply position for Tameside. Paragraph 74 of the NPPF specifies that a buffer also needs to be applied to the five-year housing land supply as follows:
- 5% - to ensure choice and competition;
 - 10% - where the local planning authority wishes to demonstrate through an annual position statement or recently adopted plan; or
 - 20% - where there has been significant under delivery of housing over the previous three years (as determined by the annual Housing Delivery Test results).
- 19.22 The result of the 2022 Housing Delivery Test Action Plan (paragraph 1.8) does not indicate that there has been significant under delivery of housing in the Borough. A total of 1,510 net additional homes, or 91% of the HDT requirement were delivered over the previous three years. Therefore, the net additional housing requirement for the period 2022 to 2027, including a 5% buffer, is 3,455 net additional dwellings.
- 19.23 Section 5 of the SHELAA concludes with the calculation of the five-year housing land supply, and demonstrates that the council has 3.3 years' worth of supply for the period 2022 to 2027. This is marginally greater than the 3.1 years stated by the applicant.
- 19.24 However, the five-year requirement will rise within the next iteration of the SHELAA due to the increase in the 2023 LHN figure. In addition, the supply of sites determined to be deliverable is expected to fall, as those which are under construction see completions year on year. This is expected to result in there being less than 3 years of deliverable supply. A significant shortfall therefore exists in the deliverable supply of land for housing, although, as evidenced by the results of the HDT, this has not historically been a persistent issue.
- 19.25 The applicant's Planning Statement states that the site will make a significant positive contribution to the five-year housing land supply position, delivering 475 homes between 2023/24 and 2027/28.
- 19.26 However, it is considered a more cautious approach should be taken, being more realistic and founded upon published evidence including the SHELAA; application of Lichfield's Start to Finish (Second Edition, February 2020); local evidence which assesses the factors affecting the time between initial permission and delivery of first dwelling; and annual average build out rates of large scale housing sites. This evidence suggests that there will be no housing completions on this site within the next five years. Any outline planning permission of this scale would still have significant challenges to overcome including, for example, the making of subsequent reserved matters applications, resolving planning conditions, legal agreement and strategic infrastructure delivery.
- 19.27 Therefore, while it is accepted the Council falls short of having a 5-year housing land supply, there is no evidence the application site will make a positive contribution to either land supply or delivery of new homes in the short term.

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- 19.28 As set out above, Places for Everyone is to be given substantial weight in the determination of this application. The plan aims to strategically manage jobs, housing and sustainable growth whilst addressing disparities and inequalities across nine of the Greater Manchester districts. While the plan illustrates that, in numerical terms, the existing supply of potential

housing sites identified by the nine districts is adequate to meet the overall identified need, meeting numerical needs alone is not enough.

- 19.29 The land supply needs to have sufficient flexibility within it to ensure it is deliverable, viable and robust as the resultant Green Belt boundary should endure beyond the plan period. Therefore, strategic sites, including Godley Green are required.
- 19.30 Within Tameside, the plan seeks to establish a target over the plan period equating to the delivery of 8,245 new homes. Tameside does not have sufficient supply within the existing urban area to deliver against this target without the inclusion of the strategic sites that are currently in the Green Belt. The addition of proposed allocations in PfE result in a housing land supply capable of delivering in total 8,752 new homes, as set out below.

PfE Table 7.1 Sources of Housing Land Supply 2022-2039 sets out Tameside's housing land supply including the contribution of allocations.

| | 2022 Tameside Strategic Housing Land Availability Assessment | | | Allowances | PfE Allocations | 2022-39 Land supply |
|------------------------|--|------------|-----|------------|-----------------|---------------------|
| | Brownfield | Greenfield | Mix | | | |
| No of dwellings | 5,127 | 714 | 455 | 562 | 1,894 | 8,752 |

- 19.31 Whilst the application is unlikely to make a positive contribution to the delivery of new homes within the next five years, it is considered that Godley Green will deliver 1,452 homes over the plan period, consistent with local delivery rates across multiple outlets, as evidenced within the Council's SHELAA. The site is critical in the long-term delivery of a sustainable supply of sites, and is expected to make a meaningful planned contribution to new homes in the medium to long term, including beyond 2039.

Conclusion

- 19.32 It is accepted the Council does not have an up to date adopted housing target and should instead make use of the standard method, as set out by the applicant. However, significant progress has been made through the examination of Places for Everyone toward rectifying this.
- 19.33 In addition, it is accepted that the 5-year housing land supply position is significantly less than 5 years and in the range of 2.7-3.3 years dependent upon the date of data used from both a supply and requirement perspective. However, the Council has not, suffered persistent, historic under delivery, as defined by the results of the Housing Delivery Test
- 19.34 However, it is not considered that the application site will make a positive contribution in the short term toward improving the boroughs 5-year land supply position as is suggested might be the case by the applicant given the relative complexities which exist in delivering sites at this scale.
- 19.35 It is also not considered that the Written Ministerial Statement of December 2015, relating to housing need and Green Belt harm carries little, if any, weight simply because it has not been directly incorporated into the NPPF through its subsequent revisions and is instead still material.
- 19.36 That said, the site's potential contribution toward medium and long-term supply is recognised. Places for Everyone seeks to establish a target for the borough to deliver 8,245 new homes by 2039, which although less than the borough's LHN for the same period, requires the contribution of strategic sites beyond what is capable of being delivered by existing sites within the urban area. The site is identified within PfE site selection criteria, is consistent with

the spatial strategy and strategic objectives and having the capability to significantly boost the long term supply of homes in a managed and planned way.

- 19.37 The development can play a strategic role in the ability of the Council to meet its long-term housing land requirement in a sustainable manner. This would comply with the aspirations of Places for Everyone which is now at an advanced stage in the plan making process. The overall benefit attributed to housing supply is attributed significant positive weight in the planning balance.

20. AFFORDABLE HOUSING

Policy Context

- 20.1 UDP Policy H4 Types, Size and Affordability of Dwellings outlines that the provision of new housing should incorporate a range of dwelling types, sizes and affordability to meet the needs of all sections of the community and to help create better balanced communities for the future. The policy also goes on to outline the local planning authority's approach to affordable housing provision, which states that this will be sought in areas of need on suitable residential sites of 25 or more dwellings or 1 hectare or more in size.

- 20.2 NPPF paragraph 65 seeks to ensure that

'Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups...'

- 20.3 PfE Composite Plan September 2023 Policy JP-H2 Affordability of New Housing addresses the issue of the ability of people to access housing at a price they can afford. In particular, criterion 2 looks to maximise the delivery of additional affordable homes, including through local plans setting targets for the provision of affordable housing for sale and rent as part of market-led developments based on evidence relating to need and viability'. Criterion 3 also seeks to

'Support provision of affordable housing, either on- or off-site, as part of new developments (avoiding where possible clusters of tenure to deliver mixed communities).'

- 20.4 PfE Composite Plan Policy JP Allocation 31 Godley Green Garden Village, includes a new criterion that seeks to ensure the site will

'Make provision for around 2,350 new homes across a range of types and tenures and having regard to the Council's most up-to-date Housing Needs Assessment. Affordable housing will be provided in accordance with the Council's affordable housing requirements.'

- 20.5 Of relevance to this application is the updated analysis of affordable need set out in the latest iteration of the Tameside Housing Needs Assessment (HNA). This assessment identifies a net shortfall of 828 dwellings each year and a tenure split of 60% rented and 40% affordable home ownership. Table C13 goes further, splitting affordable tenure to ward level. For Hyde Godley, this is identified to be 70.2% affordable rented and 29.8% affordable home ownership.

Applicant's case

- 20.6 The applicant's submitted Planning Statement states that there is a significant need for affordable housing within Tameside. Their position is based on analysis of the GM Strategic Housing Market Assessment (GM SHMA, 2019), prepared to support Places for Everyone,

and data on gross affordable housing delivery taken from the Government's live data tables. This evidence suggests a net annual affordable housing requirement of 523 dwellings, and that the current level of completions are low, with a four-year annual average delivery rate of 89 dwellings.

20.7 Whilst the applicant states (Planning Statement, paragraph 7.84) that the quantum of affordable housing, or type of tenure, is not set out in policy, paragraph 5.16 specifies that

'Within the residential element of the proposal, 15% of all dwellings will be affordable to be secured by legal agreement, with the split of tenure suggested at 60% affordable rent and 40% affordable home ownership subject to further discussion with the LPA. This level of affordable housing provision is in accordance with Council's Executive Cabinet's requirement for all new development.'

20.8 The submitted Planning Statement states that 'a total of 15% of all dwellings' within this application are proposed to be affordable.' This equates to delivery of 323 new affordable dwellings across the lifetime of the development and will therefore contribute to meeting part of the Borough's affordable housing need.

20.9 The applicant has made reference to the findings of the 2020 Tameside Housing Needs Assessment in their Planning Statement (paragraph 7.93) and as such proposes to provide a 'tenure mix of 60% affordable rent and 40% affordable home ownership.' They go on to highlight that based on this provision, the development will accord with the NPPF requirement to deliver a minimum of 10% of units for affordable home ownership.

20.10 The applicant states that a minimum of 15% (323) of all the dwellings would be affordable, split 60% affordable rent and 40% affordable home ownership. They state that the overall affordable contribution from the site represents a substantial level of provision, and this will assist in addressing an identified affordable housing need in the borough and on this basis this should therefore be offered 'very substantial' weight (Planning Statement, page 147) in the planning assessment.

The Council's assessment

20.11 Paragraph one of UDP Policy H4 is relevant in this instance. It expects that

'new housing in the borough should incorporate a range of dwelling types, sizes and affordability to meet the needs of all sections of the community and to help create better balanced communities for the future.'

However, prior to 2018, the Council did not require 'developers to provide an element of subsidised or low-cost market housing on suitable residential sites of 25 or more dwellings or 1 hectare or more in size' as evidence did 'not show sufficient demonstrable evidence of need for additional affordable housing to meet local need in any areas of the Borough.' The reason for this is set out in the reasoned justification of Policy H4.

20.12 The 2017/18 Housing Needs Assessment provided an analysis of the social, economic, housing and demographic situation across the area at that point in time, and was presented to Executive Cabinet on 28 August 2018. The Council resolved to agree with the recommendations presented, that,

- i. The outcomes of the Tameside Housing Needs Assessment be noted,
- ii. That the Council expects all new development to meet the Council's aspirations of 20% affordable housing but will not accept anything less than 15% except in exceptional circumstances, with immediate effect.

The LPA, therefore, accepts that the proposed contribution of 15% affordable new homes across the Godley Green site is in accordance with this requirement.

20.13 Paragraph 65 of the NPPF states that,

'Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups.'

20.14 The proposed affordable home ownership contribution across the site will be lower than the 10% expectation identified in paragraph 65 of the NPPF. However, this lower figure is in line with local evidence from the 2020 Tameside HNA. The HNA recommends a 60% affordable rent and 40% affordable home ownership split across the Borough and 70.2% and 29.8% respectively in Hyde Godley. Applying this 40% affordable home ownership split from the local evidence to the affordable homes contribution arrives at a 6% contribution for affordable home ownership across this site. Applying a 10% affordable home ownership contribution would exceed locally evidenced requirements and exceed the level expected in the Hyde Godley ward area and prejudice to meet the affordable housing needs of those seeking affordable rented properties. Officers are therefore satisfied that the contribution as proposed is appropriate in the context of the local evidence available.

20.15 However, whilst support can be given the proposal for a 15% affordable housing contribution, split between 60% affordable rent 40% affordable home ownership, little is known about the precise type (e.g. the split between houses and apartments and number of bedrooms etc.). Therefore, the applicant proposes that the permission is conditioned to require 15% affordable housing in accordance with the proposed tenure split, subject to viability. The number, tenure and location of the dwellings would be determined per phase but on the basis that the scheme provides 15% total across the development.

20.16 With regards to delivery, although no annual build out rate for affordable housing is provided by the applicant, it is possible to calculate what it could amount to using the estimated housing delivery trajectory (Planning Statement, page 35). Analysis of this table, using the 15% affordable housing requirement as a proxy, would suggest that the range of annual affordable delivery would be between 13 and 27 units net per annum, depending upon the delivery year (this discounts the first year of delivery due to its lower delivery estimate). On average this amounts to 20 net additional affordable homes per annum over a 16 year period. This broadly aligns with the council's trajectory produced to support PfE which also indicates that there would be delivery of 20 net affordable dwellings per annum on average.

20.17 The proposed 15% affordable housing contribution on this site would assist with PfE 'Strategic Objective 1: Meet our housing need' by increasing the number of affordable homes and would also meet with Policy JP-H2 Affordable Housing Provision Criterion 3 which would

'Support provision of affordable housing, either on- or off-site, as part of new developments (avoiding where possible clusters of tenure to deliver mixed communities).'

20.18 The potential to deliver 15% affordable homes is consistent with the Policy JPA-31 as set out in paragraph 13.4 of this report.'

20.19 Consultation advice from the Council's Housing Strategy Team also recommends that 'As the scheme will be delivered over a 15-year period based on strong place-making principles, property values within the scheme may perform better than expected. If so, there would be the opportunity for a higher quantum affordable housing to be delivered on site via planning obligations. This could equate to a total provision of 30% affordable housing or 645 units.'

20.20 Taking the above into consideration, it is clear that the proposal has the capacity to deliver housing that will help to meet affordable housing need in the Borough. The applicant

contends that 323 affordable homes could be delivered by applying the council's 15% requirement. The Council's Housing Strategy Team note that based on the projected long-term nature of the project that opportunities may arise for higher levels of affordable homes to be delivered in future phases. Whilst there is no doubt that this is a possibility, it is a hypothetical scenario and not one that can carry weight in the decision making process. However, the applicant and the LPA concur that the proposal presents a policy compliant approach. Delivery will likely continue over the lifetime of the development, and as set out above is likely to be at an average rate of 20 affordable homes per annum. This is noteworthy given annual average (for the past 4 years) gross delivery rates of 89 affordable homes. This is in the context of a net annual affordable housing requirement of 523 dwellings, a figure which represents what proportion of additional households in Tameside might require affordable housing, many of these are existing households already living in accommodation and need is met through a variety of mechanisms including the delivery of social housing, specialist accommodation and affordable housing programmes, alongside new build development, such as this proposal. However, it is important to note the requirement is influenced by many factors, including for example changes in affordable housing stock, estate regeneration, right to buy, personal financial circumstances and cannot be simply translated as an affordable housing target, but instead evidences the scale of the challenge.

- 20.21 The delivery of 15% of the housing as affordable would also be fully compliant with UDP policy H4 and policy JPA-31 of PfE. There would be attributed social and economic benefits to this housing, which taken in the context of the boroughs affordable need would be a significant benefit. Accordingly significant positive weight should be attributed to this factor in the planning balance.

21. SOCIO ECONOMIC MATTERS

Applicant's case

- 21.1 The applicant sets out that economic growth has not been experienced equally across Greater Manchester, and Tameside has underperformed comparative to a number of other boroughs. The supporting statement references the known socio-economic inequalities both within Tameside and neighbouring wards to the site. The applicant states that the development presents an opportunity to provide a step change to help rebalance the local housing market by a mixed tenure development within a unique Garden Village environment. Reference is made to the success of the regeneration of Hattersley, adjacent to the site, the ability to build upon this success and continue the regeneration of the wider area.
- 21.2 The applicant draws upon the evaluation report of the regeneration of Hattersley, undertaken by the Heseltine Institute for Public Policy, Practice and Place. This highlights the successes, including the diversification and upgrades to existing housing stock; new build properties primarily for sale; other wider improvements to Hattersley station; and development of a new district centre, driving local employment opportunities and improvement to life chances.
- 21.3 The applicant states that the development would promote a continuation of economic growth within Tameside. Jobs would be created within construction equivalent to £25m gross value added (GVA) and 550 jobs per annum across the development period with operational jobs equivalent to a total £60m GVA per annum and a total jobs provision of 590. There would also be direct economic benefits to the Council including additional Council Tax and Business Rate receipts and £4m in New Homes Bonus per annum for the first six years. In addition, it is stated that the development would contribute positively to the emerging regeneration plan for Hyde Town centre, including increased local spend.
- 21.4 The development as set out by the applicant seeks to build on the previously successful interventions and continue the regeneration of surrounding areas through spill over effects, in addition to committing to a local labour agreement to ensure many of the construction jobs

are sourced locally and benefit of existing residents. Further to this the applicant's assessment notes that development will reduce deprivation outcomes, particularly regarding health and access to open space (including those equipped for play), investment and stimulating community interaction, with consequential benefits to physical and mental wellbeing. The applicant draws the relationship between the proposed development and benefits which are often realised in neighbouring areas, such that when one area experiences economic development, benefits include knowledge, increased wage and investment spill over.

- 21.5 The applicant attaches substantial positive weight to the beneficial socio-economic impacts resulting from the development.

The Council's assessment

- 21.6 Chapter 6 (Building a strong, Competitive Economy) of the NPPF advocates that planning policies and decisions should support economic growth. Paragraph 81 states;

'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'.

- 21.7 The applicant's Planning Statement and Environmental Statement (ES) identify that there will be significant cumulative benefits associated with the socio-economic effects of the scheme, in terms of GVA and job creation, which will significantly boost the local economy.

- 21.8 The creation of a vibrant economy which promotes health and wellbeing is the golden thread to the Council's Corporate Plan (Our People – Our Place – Our Plan). The plan looks to nurture communities to raise attainment, aspirations and skills levels. The creation of a vibrant economy along with the promotion of healthier lifestyles are identified as core priorities of the Council, which strives to give its residents the best chance in life.

- 21.9 The Council's Inclusive Growth Strategy plays a major role in how the vision of the Corporate Plan is delivered. It provides detail on how the Council and its partners across all sectors, will work together to help grow the Borough's economy in a way that supports its residents and maximises opportunities. Godley Green is identified as being within the 'Hyde Triangle', which is a priority of the Council as a targeted area for growth and regeneration.

- 21.10 The site sits adjacent to two areas within Hyde that are identified as being amongst the 10 per cent most deprived neighbourhoods in the country, this includes Hattersley, an area of predominantly social housing. The social and economic benefits presented by the applicant are acknowledged and these, in the main, are considered to be a reasonable reflection of the development's potential to secure long-term social and economic benefits. They also align with the strategic objectives of the Corporate Plan and the objectives of the Inclusive Growth Strategy.

- 21.11 There can be no guarantee that the development would give jobs or provide training opportunities to those in the highest areas of deprivation. However, many jobs and training schemes (including apprenticeship opportunities with house builders) will be created during the construction phases and upon completion of such a major development. It is proposed that a condition requiring labour and training agreements will help to maximise employment opportunities for Tameside residents, in line with economic and social objectives of UDP Policy E7, PFE Policies JP-Strat 6 and JP-J1 and the Corporate aspirations of the Inclusive Growth Strategy.

- 21.12 The ES identifies the proximity of the site to Hyde Town Centre and that the development is expected to increase the demand for retail and leisure services locally, providing additional local job opportunities, in addition to those created within the two proposed village centres. The associated benefits of economic growth and additional spend within Hyde would be a

particular benefit which the development would positively contribute to, particularly as Hyde is identified as a priority for future growth and is to be supported by an emerging regeneration framework.

- 21.13 Section 70(2) of the Town and Country Planning Act 1990 (as amended) provides that a local planning authority must have regard to local finance considerations as far as they are material. Section 70(4) of the 1990 Act defines a local finance consideration as a grant or other financial assistance that has been, that will or that could be provided to a relevant authority by a Minister of the Crown (such as New Homes Bonus payments), or sums that a relevant authority has received, or will or could receive in payment of the Community Infrastructure Levy. Planning Practice Guidance states that it would not be appropriate to make a decision based on the potential for the development to raise money for a local authority or other government body. As such, whilst generating New Homes Bonus is a minor beneficial impact, the level of council tax and business rates generated cannot be taken into consideration..
- 21.14 The development is expected to make a positive contribution to tackling deprivation and promoting inclusive growth within the Borough, in particular to the specific localities adjacent to the site. This would be through either direct, indirect or catalytic economic impacts, on areas which are recognised as within the most deprived nationally, which having benefitted from intervention, investment and support, also need continued assistance. Particularly key to these socioeconomic benefits, and them being realised adjacent deprived communities is the provision of the multi user bridge from the development site to Hattersley, connecting the two. This will support social cohesion, enable a more convenient access for existing residents of Hattersley to Alder Community High school, enable access to primary school provision for new residents through Hattersley whilst also providing access to existing rail station infrastructure and potentially boost line patronage.
- 21.15 Further, direct and indirect social-economic benefits will be attributed to the development throughout the construction and operational stages. The use of local employment agreements would ensure compliance with UDP policy E7 by targeting unemployment within neighbouring deprived wards, the associated opportunities represent a positive step change to achieving the growth and regeneration aspirations the Council has identified within its Inclusive Growth Strategy, this is attributed substantial positive weight in the planning balance.

22. HEALTH IMPACTS

Applicant's case

- 22.1 The ES addresses health impacts in and includes a Health Impact Assessment (HIA) which assesses the human health impacts during the construction and operational phases.
- 22.2 The applicant states that the submitted HIA demonstrates that a significant net positive effect on health would be achieved both across the site and within neighbouring areas of Hyde and Hattersley.
- 22.3 The HIA provides a description of the existing health conditions in the area. It identifies that Hyde and Hattersley have several health indicators which show that the health of the population is significantly worse than the average for England. Tameside residents experience a higher rate of circulatory (47% higher) and coronary heart disease (67% higher) compared with the England average. Child development and unemployment are also areas of concern, with development rates 15% lower than the average for England.
- 22.4 The development would include the provision of a significant amount of publicly accessible open space, including equipped play areas, formal recreation areas and natural spaces. The public open space and proposed sports facilities would be linked by an attractive network of

walking and cycle paths. The HIA notes that by creating this infrastructure, the development can stimulate activity and improve health outcomes.

- 22.5 Further to the above, the applicant identifies that the range and quality of housing options could improve mental and physical health by encouraging residents to make healthy choices, improving living environments, contributing to a positive mental state, creating a socially cohesive community, and meeting the needs of older and disabled people.
- 22.6 The inclusion of community facilities in the proposed development, including a proposed health centre, school accommodation and retail spaces, provide necessary services and have the potential to foster social interactions that could help the proposed development connect with surrounding neighbourhoods.
- 22.7 The HIA concludes that the development is likely to have major positive health impacts for residents within the area. Negative impacts are largely limited to the construction phases, and these can be mitigated via conditions, such as a robust Construction Management Plan (CMP). The main driving factor behind the benefits would be the significant improved access to open space and nature that would be created, this could stimulate activity and improve health outcomes. The provision of on site community facilities within the village centres along with proposed expansion to Alder Community High School would also promote social interaction which would benefit established communities within neighbouring areas.
- 22.8 The applicant attaches substantial positive benefits to the health impacts of the proposal.

The Council's assessment

- 22.9 Chapter 8 (Promoting healthy and safe communities) of the NPPF advises that planning policies and decisions should aim to achieve healthy, inclusive and safe places.
- 22.10 The Planning Practice Guidance (PPG) on healthy and safe communities states a; *'healthy place is one which supports and promotes healthy behaviours and environments and a reduction in health inequalities for people of all ages. It will provide the community with opportunities to improve their physical and mental health, and support community engagement and wellbeing'*.
- 22.11 Promoting health and wellbeing is also the golden thread to the Council's Corporate Plan (Our People – Our Place – Our Plan), nurturing communities to raise attainment, aspirations, skills and promotion of active lifestyles are identified as core priorities of the Council which strives to give its residents the best chance in life.
- 22.12 The neighbourhood health profile for Hyde is stark. Hyde generally has a relatively high level of deprivation; high levels of respiratory illness linked to smoking; high levels of obesity; and low uptake of relevant healthcare services such as annual health checks. In terms of the population, up to 2030 there is estimated to be a 3.64% overall population growth but this varies across different age groups with a 2.53% increase in the 0-19 age group; no change in the 20-39 group; 3.49% reduction in the 40-59 age group; 12.93% increase in 60-79 age group; and 34.77% increase in the 80+ age group.
- 22.13 This forecasted growth means there is likely to be an impact on health and social care demand in the Hyde area, with a growing older population up to 2030; where housing and community spaces and assets should therefore be designed to be 'age-friendly'. One of the key objectives of PfE is to create neighbourhoods of choice across Greater Manchester and sustainable places, well served by local shops, services and amenities, easy to move around and well connected (PfE policy JP-P1).
- 22.14 Further, the ES identifies that the following measures will be embedded into the development to the overall benefit of health and wellbeing:

- Sports and leisure uses, including cycle paths and walking routes
- A variety of public open spaces
- Dedicated care / retirement living homes
- Education facilities
- At least 15% of new homes will be affordable

- 22.15 The conclusions of the HIA are supported positively by Public Health. The approach to design, improved access and provision to public open space is likely to yield positive health impacts particularly around active travel, access to parks and play areas, provision of additional school and community facilities, health and education infrastructure and high quality housing design. Negative impacts are as set out above largely limited to the construction phases and it is agreed that these can be largely mitigated via conditions such as a robust CMP.
- 22.16 Onsite facilities and greenspace will address both future residents' requirements in addition to identified deficiencies within neighbouring communities. Road links and the new bridge will connect the development with the established communities which will have a positive health impact on surrounding neighbourhoods, including Hattersley. The provision of dedicated older person's accommodation, in addition to affordable housing would meet growing demand within the Hyde area and in turn this would contribute to a mixed and balanced community.
- 22.17 The parameters plan seeks to introduce health facilities within the site as part of dedicated local community facilities. The Primary Care Service identifies that all patients have access to general practice services and that all residents fall within the practice boundary of a practice or practices, therefore ensuring patient choice to register with a practice. The footprint of the Godley Green site is covered by a range of existing practice boundaries. The provision of onsite community facilities within the village centres along with proposed expansion of Alder Community High School would also promote social interaction which would benefit established communities within neighbouring areas.
- 22.18 The preference would be to develop a health hub within one of the villages of the site. The addition of this facility would address a range of services for the Godley Green population and expand access capacity to services for Hyde and Hattersley more generally. Subject to securing the provision of the health hub the development would meet the policy objectives of policy H6.
- 22.19 The proposals are aligned to national policy requirements within section 12 of the NPPF relevant to promoting healthy, safe and inclusive places, in addition to PfE Policy JP-P1 regarding the creation of sustainable, liveable places and PfE Policy JP-H3. Open space and recreation areas comprise an essential element of both Garden City and Building for a Healthy Life principles, contributing to the creation of healthy and active communities. The delivery of a large scale mixed tenure housing development served by onsite social infrastructure, in addition to the extensive provision of accessible open space would be a significant benefit of the development. Improved walking and cycling connections to Hattersley and Hyde would also help the development to successfully forge with existing communities and address current identified health inequalities which exist. The development would provide a healthy, accessible and overall sustainable environment for its future residents who would have access to services, green spaces and transport, these benefits would be felt equally within neighbouring communities. Overall the associated health benefits would be positive, and this is afforded substantial positive weight in the planning balance.

23. EDUCATION

Applicant's case

- 23.1 There is a need for additional education provision arising from this development, at both primary and secondary level. There is also a need arising from future planned development in the area. In order to address these needs, the proposals include land for secondary school accommodation to assist with the expansion of Alder Community High School, and financial contributions towards primary, secondary and special education needs in the Borough.
- 23.2 The intention is to expand and remodel the existing accommodation at Alder Community High School, and provide for 60 additional places, equivalent to an additional two forms of entry per year group, equating to 240 places in total. The anticipated demand from Godley Green once completed would be 43 spaces, so the proposal would secure a surplus of 17 places within each year group.
- 23.3 The applicant states that the development therefore suitably mitigates its impacts whilst also providing surplus capacity for future strategic developments in the area

The Council's assessment

- 23.4 Paragraph 93 of the NPPF requires that the planning decisions ensure an integrated approach to considering the location of housing, economic uses and community facilities. Paragraph 95 states;

'It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education They should: (a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications.

- 23.5 Policy H6 of the UDP relates to contributions from residential development towards education and community uses. The policy applies where schools and services in the surrounding area would be unable to satisfactorily accommodate the additional demands, it requires developers to provide proportional contributions towards the provision of additional or extended facilities.
- 23.6 Secondary provision within the locality is sensitive, with Alder Community High School operating at close to capacity. The parameters plan makes provision for additional secondary accommodation on land to the north of the existing sports field. The land would allow for the expansion of the school's campus in order to meet predicated growth levels beyond the impact of the Godley Green development itself. The delivery and phasing of this would be approached so that additional education capacity is in place to address the immediate needs arising from the development.
- 23.7 Consultation with Education services has confirmed that it is access to secondary places where there is most need for additional capacity including towards primary and special educational needs. A contribution of circa £5 million is required.
- 23.8 The applicant's approach plus a financial contribution would mitigate demand from the site in addition to providing additional capacity and flexibility. Delivery would be secured by the completion of 140 dwellings within the site. Contributions to improve off-site capacity at specialist school places would be secured on commencement and primary places would be addressed by approximately 1800 dwelling. This would meet the policy tests in H6 and paragraph 95 of the NPPF. The ability of the development to both mitigate its educational demands and contribute to additional capacity is a benefit that can be afforded moderate weight in the planning balance.

24. LOCAL CENTRES

Policy

- 24.1 NPPF paragraph 87, supported by NPPG, is clear that Council's should adopt a 'town first' approach to assessing applications. Proposals for 'town centre uses' as defined by the NPPF which are not in the town centre and not in compliance with an up-to-date plan should be subject to a sequential test. The test should consider if there are existing suitable, viable and available sites within or on the edge of existing towns that could accommodate the anticipated needs of the development.
- 24.2 NPPF paragraph 90 requires local planning authorities to assess applications for retail and leisure uses outside of town centres and request an impact assessment if the development is over a proportionate, locally set threshold. Tameside do not set a local threshold, so the default is 2,500m² of gross floorspace.
- 24.3 In terms of new neighbourhood centres, there is no explicit policy guidance within the NPPF to address circumstances where new centres or neighbourhood parades (these tend to focus on convenience stores, services, takeaways and pubs) are justified. They do have an important role as 'community hubs' supporting paragraph 92 and 93 of the NPPF in promoting mixed use development to support healthy and safe communities. Paragraph 93 advises that decisions should provide social, recreational and cultural facilities and services the community needs. It further advises that decisions should; 'plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments'. Under the heading of 'identifying Land for New Homes' paragraph 73 of the NPPF advises that 'supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes)'. Reference is made to ensuring that new large-scale development supports a sustainable community with sufficient access to services and employment within the development itself. It also refers to following Garden City principles.
- 24.4 PfE policy JPA 31 requires that two local hubs are delivered within the development "offering flexible workspace opportunities and a range of community, retail, cultural and leisure uses" the provision of shops and services is considered a requirement to help meet the Garden City principles. Other relevant PfE policies are policy JP-Strat 6, JP-J1 in terms of supporting local job opportunities and JP-P1 in terms of creation of sustainable places.
- 24.5 At a local level, the Council's Inclusive Growth Strategy supports local job creation and the growth of key town centres. Relevant to the assessment of proposals for new local shopping developments UDP policy S6 states that; 'The Council will permit the development of additional neighbourhood food stores, local shops and other small scale retail outlets serving local needs where suitable sites or buildings are available subject to satisfying three criteria, these being that the developments do not;
- adversely affect the vitality and viability of established district or local centres;
 - not lead to a loss of amenity in surrounding residential areas; and,
 - not result in traffic problems on adjacent highways.

Applicants case

- 24.6 Godley Green's Garden City Vision is set out in the Design and Access Statement (Chapter 4) and includes cultural, recreational and shopping facilities in walkable, vibrant, sociable neighbourhoods. This vision includes the concept of mixed-use focal points providing everyday services and opportunities for social interaction in pedestrian friendly public spaces (paragraph 5.6 of Design and Access Statement). The concepts are based on the successful villages of Port Sunlight and Letchworth Garden City.
- 24.7 The Planning Statement, at paragraph 7.9, page 93, sets out that the proposed local centres with "flexible and wide-ranging" mix of uses will comply with PfE policy JPA31 and proposes

the restriction of uses and unit sizes to ensure that the centres are at an appropriate scale. It concludes that:

- the mix of uses is acceptable as they meet the needs of the future residents;
- there are no sequentially preferable locations for these uses in existing centres, as the centres are not within a reasonable walking distance from the development;
- the scheme will not adversely affect the vitality and viability of the established district and local centres and instead will complement them.

24.8 In order to address the policy test as set out in NPPF para 87, the applicant has submitted a sequential assessment. At paragraph 3.25 within that statement the applicant accepts it is for the applicant to demonstrate compliance with the sequential test and that it also needs to be proportionate and appropriate for the given proposal, requiring judgements to be made in any particular case.

24.9 In normal circumstances a sequential assessment should focus on the question if suitable sites are available which are sequentially preferable, such as those sites which are in a town centre. However due to the circumstances arising that the assessment seeks to demonstrate there is a qualitative need for retail provision within the development. It concludes that this provision cannot be met in the existing town centres of Hyde and Hattersley's in a sustainable way. The provision of shops and services to meet the day-to-day needs of new residents in the two local centres means that there are specific 'locational' reasons for the proposed town centre uses within the site— therefore the sequential test is satisfied. Further to this the applicant sets out, reliance on sites in existing centres would serve to undermine the Garden City principles and be inconsistent with NPPF paragraph 93 which directs Councils to plan positively for the provision and use of community facilities such as local shops and other facilities and to enhance the sustainability of communities.

The Council's assessment

24.10 The proposal is clear that the role of the central 'hubs' is to provide the day-to-day shopping, services and facilities to serve the immediate newly generated residential population. The proposed mix of uses are typical of a small village hub which could include the provision of retail shops, local health facilities, takeaways, cafes and other such community or leisure uses. The social benefits and local employment opportunities created will also help meet the objectives of the Council's Inclusive Growth Strategy and PfE policies JP-Strat 6, JP-J1 and JP-P1.

24.11 The PPG directs that failure to undertake a sequential assessment could in itself constitute a reason for refusing permission and that application of the sequential test will need to be proportionate and appropriate for any given proposal. There is no lower floorspace threshold under which the sequential test need not be applied. Therefore, the sequential assessment process should be followed. The PPG also notes that through the application of the sequential test that it may be appropriate to recognise that certain main town centre uses have locational requirements which mean they may only be accommodated in specific places.

24.12 However, the application raises particular issues for which there is no policy or guidance at a national level, other than the broad indication within paragraph 93 of the NPPF as identified above.

24.13 However, the Council is minded to agree with the applicant that there is a qualitative need for supportive main town centre uses of an appropriate scale within the development and this is reflected in PfE policy JPA31 which sets this out as a requirement. Further the Councils own retail study advises that small scale convenience retailing would not be inappropriate.

24.14 While the sequential test directs to consider the availability of suitable sites within existing centres, such as those of Hyde and Hattersley, to do so would be at odds with Garden City principles and in this instance create tensions with other policies of the framework. To secure a sustainable development and provide the small scale of retail provision within a walkable

distance, arising only as a result of the proposed residential development, limits the extent of any sequential assessment for those specific locational reasons.

- 24.15 The Council is therefore satisfied that the sequential test is passed. However, for the same reason that the qualitative need only arises as a result of the development, neutral weight is to be attached to this matter.
- 24.16 Appropriate conditions should ensure that the overall quantum, scale of individual premises, number and mix of premises and uses remain within the context of the main town centre uses being ancillary to the delivery of the site against garden city principles and within the spirit of supporting top up retail provision.
- 24.17 The provision of local (village) centres within the development will also deliver economic, social and environmental benefits. The centres would provide economic opportunities in the form of employment, social benefits in the form of hubs which encourage engagement and interaction and environmental benefits associated with the reduction for the need to travel. These benefits could extend beyond the sites boundaries into existing communities, overall the centres are aligned to Garden Village principles, they would provide both welcomed character and identity to the site, their provision is considered to be benefit of the development, as such a limited positive weight is attributed to this factor in the planning balance.

25. DESIGN

Policy

- 25.1 Paragraph 130(f) of the NPPF states that development should seek to provide a high standard of amenity for existing and future users alike. This is reflected in policy H10 of the Councils UDP and the recommendations of the Residential Design Guide SPD, which seek to ensure that all development has regard to the amenity of existing and proposed properties.
- 25.2 The policies of the adopted Residential Design Guide strive to raise design standards. Good design is aligned to the delivery of high-quality residential amenity standards, this should reflect equally on the environment of existing residents as well as that of future new residents.
- 25.3 Technical standards form part of the criteria in the assessment of good design, but this done alongside the general principles of successful place making. Good design is about how buildings relate to one another, their place within the streetscape and interaction within their surroundings.
- 25.4 Paragraph 126 in the NPPF states that 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 and creates better places to live and work. And paragraph 130 of the NPPF states that planning decisions should ensure that developments:
- function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - 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);
 - 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;

- 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
- 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 users⁴⁹; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

25.5 Paragraph 124 in the NPPF states that planning decision should make an effective use of land, while safeguarding and improving the environment and paragraph 125 states that design guides, codes and masterplans can and should be used to help ensure that land is used efficiently while also creating beautiful and sustainable places.

Applicant's case

25.6 Albeit for the details of access, the application is in outline such that matters of scale, appearance, layout and landscaping are reserved for determination at a later date. However, the application has been made on the basis of a series of parameters plans which consist of:

- Indicative masterplan;
- Land Use parameter Plan;
- Density & Height parameter Plan;
- Movement and access parameter plan;
- Site phasing plan; and
- Strategic Design Code.

25.7 The applicant states that these plans demonstrate the location of residential development plots, village centres, heights of buildings, densities, site roads and green infrastructure in order to give as much certainty as is possible at this stage in the planning process.

25.8 The applicant states that the design principles set out in the supporting documents are influenced by topography across the site and conclusions of the landscape and visual impact assessment (LVIA). They say that the Design and Access statement includes a thorough assessment of local context and design precedents within the locality. Reserved matters applications would need to have full regard to the details within the parameters plan, master plan and strategic design code. In addition to this, design would be assessed with full consideration to the adopted Residential Design Guide as well as relevant design chapters of the NPPF.

Strategic Design Code

25.9 The Strategic Design Code is key to the applicant's achievement of good design, it focuses on the delivery of the garden village design components. The applicant states that it is rooted in achieving a locally distinctive, truly sustainable and high-quality design at Godley Green. Compliance with the code is proposed by a condition and would inform compliance within future reserved matters planning applications.

25.10 The applicant sets out the code in two tiers:

- Primary Code (Mandatory) – the primary code is mandatory, and as such future development must adhere to the code as detailed. The Mandatory Code typically relates to strategic elements outlined in Parameter Plans, such as the delivery and location of development; and
- Secondary Code (Advisory) - these cover slightly more detailed design approaches and principles that will be used across the site. They outline design detail that is deemed essential to ensure the delivery of the proposal as envisaged. Although advisory, future development at the reserved matters stage must provide clear justification to suggest why the Code cannot be delivered.

- 25.11 The Illustrative Masterplan brings together the various land uses, design parameters and Strategic Design Code to demonstrate how the site could be developed. The applicant states this is aligned with the garden village principles and the Design and Access statement provides further narrative to the proposals. The applicant sets out that the development strives to create a unique and sustainable environment which could support a mixed and vibrant community. The development seeks not only to provide new homes across mixed tenures but also essential infrastructure to support the proposed community. These facilities will also serve and compliment existing communities which neighbour the site.
- 25.12 The indicative masterplan shows that the development would be centered on the two village centres within the eastern and western areas of the site, these would provide a focal point for the residential communities which are otherwise separated by Godley Brook.
- 25.13 The Illustrative Masterplan, includes analysis of neighbourhoods within the development and illustrates how future development could look and feel. The applicant states that the masterplan provides a helpful insight into how the site might be delivered in accordance with the parameters. The masterplan has been delivered through an informed approach, with proposals underpinned by a series of desktop and field analysis. Analysis underpinning the masterplan concept includes local townscape character appraisals, desktop reviews of strategic planning policy, and spatial analysis of traditional Garden Villages and exemplar 21st century examples, to help achieve a Garden Village that brings together the best of rural Tameside and the Peak District, contemporary rural-edge housing design and traditional Garden Village design principles.

The Council's assessment

- 25.14 National policy is clear that achieving good design is a fundamental aspect of the planning system, this is embedded within the NPPF and National Design Code. The applicant's approach to development as set out within the accompanying Masterplan, Parameters Plan and Design Code is commendable.
- 25.15 It is clear the aspirations of the development are to provide a unique residential environment which also addresses inequalities faced elsewhere. Notwithstanding the aspirations of the development, it is not considered that this alone can be viewed as an exceptional, or unique circumstance, good design is expected on all developments, the use of a design code being a standard practice/response on all strategic sites.
- 25.16 Further to this Policy C12 (Art in the Environment) promotes the inclusion of public art within major developments. It recognises the valued contribution which art can play in its contribution to improving the appearance, interest and identity of the local area. A structured art strategy would be a welcomed addition to the development, this could instil a valued sense of place to the village centres and open spaces whilst also contributing positively to the overall garden village ethos.
- 25.17 The application however fails to make direct reference to the provision of a public arts strategy, although this can be secured by a condition as part of the phasing strategy. Such a condition would ensure compliance with policy C12.
- 25.18 A Building for Life (BFL) assessment has been completed by the applicant on the basis of the illustrative masterplan and parameters. BFL provides a framework to undertake an objective assessment of measuring design and place quality, it comprises of 12 questions against which a traffic light rating score is issued (the top score being 12 greens). The applicant has concluded in their assessment that the development would achieve a score of 11 greens and 1 amber.
- 25.19 Given the limitations of outline applications, there is a degree of uncertainty with regard to any future scoring that the development would achieve. However, securing the design code

by condition would shape future reserved matters applications in a manner that would ensure a high quality environment would be created. This, taken with location factors, access to public transport, provision of green spaces and mixed housing tenure gives confidence that the development would achieve a high design standard that meets Built for Life accreditation and the aspirations of UDP policies C1 and H10.

- 25.20 Whilst outside of the redline boundary there are properties within Godley Green and across the site, the majority of these are clustered around Green Lane and Mottram Old Road and to a lesser extent on Brookfold Lane. Established woodland, topography, Glossop railway line and the TPT provide a very generous separation distance to properties located to the north, east and west of the site to an extent where they are unlikely to be impacted by any undue dominance or loss of privacy from the development.
- 25.21 Concerns raised about the impact on resident's amenity feature within the many representations which have been received. It will only be possible to determine the exact relationship between buildings within the development and existing residential properties when details are submitted as part of reserved matters.
- 25.22 However, the Design and Access statement (including appendices) and Parameters Plan do provide a detailed assessment of how existing resident's amenity would be protected. The proposed strategy includes the use of green buffers, a sensitive approach to building heights, boundary treatments and a contextual response to materials and frontages. The strategy outlines that spacing distances between new buildings and existing dwellings would be in the region of between 30m and 70m from existing dwellings.
- 25.23 Landscaping, either retained or enhanced, would also be provided within these buffer areas to mitigate the impacts and soften the interface. These standards would be above minimum recommendations advocated within the Tameside Residential Design Guide, compliance would be secured via conditions relevant to the compliance with the Design Code and Parameters Plan.
- 25.24 Consideration to properties located within an area which could be influenced by commercial activities within the village centres will also be a detail to be considered as part of future reserved matters, as will the amenity of future occupiers of new homes delivered.
- 25.25 A significant opportunity of the development would be a commitment to improve the condition of Green Lane. The access is not solid bound and is heavily potholed, it benefits from no dedicated drainage or lighting. Improvements to the carriageway would be secured which would benefit existing residents, refuse and emergency services directly in addition to walkers and cyclists who pass through the site.
- 25.26 Overall, subject to appropriate conditions, a development could be delivered on the site that does not cause harm to residential amenity through overshadowing, undue dominance, privacy or the effects of light pollution. In this respect the proposed development complies with the requirement of UDP policy 1.3 and H10.
- 25.27 Further, the proposals are considered to accord with the sustainable design policies set out within the development plan, expectations of the NPPF and PfE policy, achieving good design. The expectations of achieving good design are set out within policy, the supporting masterplan, parameter plans and Design and Access Statement demonstrate that a high quality development could be delivered which is built to established Garden Village principles, this is the policy expectation. In design and placemaking terms, the associated legacy of the development should be one that is positive, accordingly this factor in meeting design requirements should be afforded limited positive weight in the planning balance.

26. OPEN SPACE AND SPORTS PROVISION

Applicant's case

- 26.1 Currently only approximately 1% of the site is publicly accessible. The applicant states that the development would deliver a significant level of green infrastructure, including open space and sports provision. As a result, over 50% of the site would be made accessible to the amenity benefit of not only future residents but existing communities within Hyde. The applicant details that accessibility would be facilitated through a network of active travel routes, including the proposed new bridge across the eastern boundary, to connect with Hattersley.
- 26.2 The provision of Green Infrastructure would be as identified in section 5.42 of the applicants planning statement, where it states that Local Areas of Play (LAPS), Local Equipped Areas for Play (LEAP) and Neighbourhood Equipped Area for Play (NEAP) will be distributed around the site to ensure all new homes are within a five minute walk time of formal play areas, as are identified on the Parameter Plan.

Further, in total when considering both existing retained and proposed new accessible green infrastructure of the site, there is proposed by the applicant to be approximately 73 hectares of space to be dedicated as accessible green space.

The Council's assessment

Existing Open Space

- 26.3 The majority of the site is within the Green Belt and is privately owned. Access at present is largely restricted to Green Lane and Brookfold Lane, in addition to the dedicated public rights of way. As identified, the Trans Pennine Trail (TPT) provides a multi-user recreation route which is part of a wider National and European cycle and footpath network.
- 26.4 Land allocated as protected open space is primarily located along the northern boundary which follows the TPT alignment. In addition to this, it also includes land along the eastern boundary within the clough around Werneth Brook.
- 26.5 Paragraph 98 of the NPPF advises that

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, and can deliver wider benefits for nature and support efforts to address climate change'.

- 26.6 Paragraph 99 advises on the protection of function open spaces from development and paragraph 100 states;

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'.

- 26.7 Policy OL4 of the UDP seeks to retain areas of protected green space, including spaces identified within the development plan, as well as non designated functioning areas of land in similar use where these are of public benefit.
- 26.8 Allowing the development would result in a loss of largely inaccessible natural open space/agricultural land. There would, however, remain an adequate supply of open space within the locality, and in this regard the additional access would benefit existing and future residents comparable to the existing situation. It is agreed that the proposals would significantly improve access to several retained areas of open space, in addition there would be both qualitative and quantitative improvements to the range of open space provided at the site. The provision of managed amenity space would also help to address the identified deficiency within the Hyde Godley Area.

- 26.9 The submitted Parameters Plan and Design and Access Statement confirm that land along the northern and eastern boundaries would be protected from development, such that the policy requirements would be met. Whilst there would be associated visual impacts, the development would not result in deficiencies to open space at the locality.
- 26.10 The Council's Open Space Review (OSR) 2018 includes a review of all open spaces across the 9 townships of Tameside. The accessibility standards include an assessment of communities' access to open space typologies.
- 26.11 The Borough's existing provision is considered against both Fields in Trust (FIT) and the National Society of Allotment and Leisure Gardeners (NSALG) benchmark quantity standards based on hectares per 1000 of the population of the following open space typologies;
- Parks and Formal Garden (0.80ha)
 - Natural Space and Countryside (1.80ha)
 - Amenity Space (0.60ha)
 - Play Areas (0.25ha)
 - Allotments (0.21ha)
- 26.12 For Hyde, the OSR identifies that it has significantly above average access to natural space and countryside, notable assets including Hyde Park, Peak Forest Canal, TPT green corridors and Werneth Low Country Park, where the latter two directly border the site. The review identifies gaps with the provision of access to parks and formal gardens (Gee Cross & Hattersley), amenity space (Godley and Gee Cross) and play areas (Gee Cross, Godley, Hattersley). Recommendations within the study include opportunities to secure the provision of new equipped play spaces which would aid the provision of more comprehensive cover across the township.

New Open Space

- 26.13 Section 8 of the NPPF promotes healthy and safe communities with Paragraph's 92 and 93 are aligned to the provision of shared spaces, community facilities and open space to improve the health, social and cultural well-being of the community.
- 26.14 UDP Policy H5 relates to the provision of open space within new developments. It advises that where there is a deficiency of children's play areas, informal local recreational open spaces or sports pitches in an area, either prior to or as a result of the scheme involved, developers seeking planning permission for housing will be required to provide open space and facilities, proportional to the intended number of occupants, in a safe and convenient location within or in close proximity to the site, and to make suitable arrangements for their on-going maintenance.
- 26.15 The Councils OSR identifies that the locality benefits from good access to natural open space, but there are deficiencies with regard to current access to play space. The application seeks to provide substantial areas of public open space across the development site, this will include various typologies to address current deficiencies and accessibility barriers which currently exist within the locality. The Strategic Design Code addresses works relevant to the provision of formal and informal open space as well as the general public realm and inter-linking active travel network. The primary code places a mandatory requirement on the development to deliver a quantum of open space as defined in the submitted Green Infrastructure Parameters Plan.
- 26.16 The overall approach to open space provision will define the development, it will address existing deficiencies within the wider locality and provide genuine health and well-being benefits for the communities they serve. The villages would be built within an environment which contains existing woodlands and biodiversity areas which would be retained and enhanced. The provision of play spaces would be secured by a planning condition including

the phasing of their delivery and future maintenance. In addition to play space there would also be dedicated areas of formal sports provision within each village.

- 26.17 The development also seeks to improve and enhance both qualitatively and quantitatively the local walking and cycling network. Existing PROW's will be retained and enhanced and the TPT will be realigned so that it is safer and more accessible, there will also be additional cycling and walking linkages provided throughout the site. It is noted that many representations have been received citing concerns over the loss of equestrian use, this is largely associated with the loss of Godley Riding school and associated grazing land. Existing bridleways will be retained and also benefit from surface and drainage improvements, better wayfinding signage, the provision of a Pegasus crossing on Mottram Old Road and the addition of mounting blocks. The loss of the existing equestrian use is balanced against the wider quantitative improvements to public open space which would occur and which would be of significant wider benefit. On balance the associated loss is acceptable.
- 26.18 It is of note that the cross-section of green space to be provided will be publicly accessible and not exclusive to just the residents of the development itself. Existing communities will benefit from improved access to a range of open spaces, allotments, play areas and formal sports provision. Cumulatively this will equate to approximately 50% of the site, a significant benefit which will have a lasting positive influence on surrounding communities.
- 26.19 Paragraph 73(c) of the NPPF makes explicit reference to setting clear expectations for the quality of places to be created and how they can be maintained such as by following Garden City Principles. The principle of long-term stewardship of public spaces and community assets is a founding objective of the Godley Green garden village. A guiding principle to the success of the development will be that there is a suitable long-term stewardship regime in place to ensure that the sites formal and informal open spaces, natural areas and associated infrastructure are maintained to high standards.
- 26.20 In terms of formal playing pitches the planning application has been accompanied by an assessment of the potential needs and impacts. It has been identified that the associated housing growth would result in additional demand being generated for all sports, where growth for football in particular is sufficient to warrant whole new pitches for match play. Whilst the proposals include the provision of sports courts and formal grass sport pitches, it is not currently possible to fully evaluate if this would be sufficient to mitigate future needs. To address this, and as supported by Sport England, it is recommended that a condition be attached to require the submission of a sport strategy statement as part of future reserved matters applications, within the context of the Playing Pitch Strategy in order to determine future needs.

Conclusion

- 26.21 The overall provision of open space has been supported by consultation responses from Green Spaces and Public Health who welcome the distribution and range of green spaces across the site. There is some current uncertainty about how the stewardship and maintenance of the public realm and open spaces areas will take place, as at present the exact stewardship model is still an unknown. However, the applicant has stated that it is likely that it will be a hybrid model including private, public and volunteer arrangements to address the various onsite typologies and greenspace environments and this is a matter to be secured by condition.
- 26.22 The proposal would deliver significant improvements to open space and sports provision in the area. Subject to conditions tied to phasing, design, future stewardship and off-site formal recreation there are no objections raised from consultees, and the development accords with requirements of policy H5 and the provisions within section 8 of the NPPF associated with health and wellbeing. As identified previously, access to open space is attributed to supporting healthy and active communities, addressing inequalities and the proposals would significantly improve overall access to high quality areas of open space, including that within

and outside of the site (Werneth Low Country Park). The onsite open space provision would address identified deficiencies within the locality and address the unmet needs of existing communities, as well those of future residents. Consideration to these benefits should be afforded moderate positive weight in the planning balance.

27. LOSS OF AGRICULTURAL LAND

- 27.1 Policy OL11 of the UDP relates to the Support for Agriculture and provides that farm holdings will be protected from the adverse effects of non-agricultural development. In addition, policy OL11 seeks to protect viable agricultural holdings and associated land which is of a higher quality, this is also reflected in paragraph 174 of the NPPF. Agricultural land is graded between 1 (excellent) to 5 (very Poor) in terms of its quality.
- 27.2 Natural England's online regional land classification maps records the site as being of either Grade 4 or urban in nature. The identification as Grade 4 (poor) agricultural land quality means that in planning terms none of the agricultural land falls within the 'best and most versatile' agricultural land categories. The applicant's assertion that the proposals would not result in material loss of high valued agricultural land are supported against the above policy framework and this matter carries neutral weight in the planning balance.

28. ECOLOGY

Applicant's case

- 28.1 The application is accompanied by a number of ecological/habitat surveys. The surveys found the site includes a variety of habitats including semi-natural broad-leaved woodland, semi-improved grassland, arable farmland, ponds, hedgerows and scattered trees, and is known to support protected and priority species. Surveys were included for bats, badgers, nesting birds, owls and amphibians.
- 28.2 A deposit has been paid to Natural England for a District Level License for Great Crested Newts. This is an acknowledgement that Natural England believe the that the development is suitable to be entered into the District Licensing scheme, which will reduce and/or replace the need for on-site mitigation for Great Crested Newts. However, as the license will not be accepted prior to determination of the application, it is appropriate to include a condition to require appropriate mitigation for Great Created Newts should planning permission be granted.
- 28.3 Approximately 50% of the site is proposed to be either retained or additional green infrastructure including areas of natural open landscape, woodland, wildflower meadows and biodiversity zones, in addition to parks, gardens and amenity spaces. Embedded mitigation in the form of habitats retained and enhanced through the development will include:
- Modified grassland – 34.38ha retained or enhanced and 7.44ha created.
 - Other neutral grassland – 10.78ha retained or enhanced and 2.09ha created.
 - Scrub – 1.2ha retained or enhanced.
 - Ponds – 0.8ha retained or enhanced and 0.16ha created.
 - Lowland mixed deciduous woodland – 13.22ha retained.
 - Other woodland – 2.15ha retained and 1.82ha created
 - Scattered trees – 4.49ha retained and 8.14ha created.
- 28.4 The applicant states that these new habitats, along with management of the retained areas, would appropriately mitigate the associated impacts of the development. There would be opportunity to ensure that onsite net gain can be achieved by bringing the retained habitat up to a much improved condition. This in turn would secure the diversification of native flora

and wildlife habitat. Management of all natural areas would be subject to a condition as part of a habitat management plan, where further conditions would ensure protection of wildlife during construction.

- 28.5 Following discussions with Greater Manchester Ecology Unit (GMEU), the applicant has produced a Biodiversity Net Gain (BNG) Assessment using the DEFRA Biodiversity Metric 3.1. The assessment concludes that, based on outline proposals for development within the site and as shown on the Green Infrastructure Parameter Plan, there would be an overall net loss of 39.27 habitat units, or -5.13% below the current baseline. However, the proposed development would result in an overall net gain of 27.46 units (+55.95%) for hedgerow units.
- 28.6 To achieve a minimum 10% biodiversity net gain, a strategy for offsetting has been produced, to be undertaken on a phase-by-phase basis. The overarching strategy will ensure biodiversity gains are first maximised on site through the enhancement of existing habitats and creation of new high-quality habitats. Offsite gains will then be provided on nearby land, including to the south of the A560 within the red line boundary, that has been set aside for this purpose. Finally, should additional units be needed to meet a minimum of 10%, these will be secured from a suitable habitat bank. Given the 15 to 20 year delivery period expected for this site, the detailed approach to BNG delivery will be reviewed at each detailed planning application for the site. The applicant states that the addition of appropriately worded conditions to require further BNG reporting with subsequent reserved matters applications can be used to ensure a net gain is achieved.
- 28.7 The submitted Environmental Statement identifies 3no. Sites of Special Scientific Interest (SSSIs) within 5km of the site; at Compstall Nature Reserve, Ludworth Intake and the Huddersfield Narrow Canal, and that the site is within the Impact Risk Zone (IRZ), with a small part of the site also falling within the IRZ for the Dark Peak SSSI. The Environmental Statement concludes that the proposals are not considered to pose a risk or do not meet the risk IRZ threshold. As a result, they were scoped out of further assessment.

The Council's assessment

- 28.8 Paragraph 174 of the NPPF states that planning decisions should contribute to and enhance the natural and local environment by, amongst other things, minimising impacts on and providing net gains for biodiversity. Paragraph 180 states that when determining applications, local planning authorities should refuse permission if significant harm to biodiversity cannot be avoided, adequately mitigated or, as a last resort, compensated for. Paragraph 180(d) goes on to state that opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains in biodiversity.
- 28.9 Policy N2 of the UDP relates to Locally Designated Nature Conservation Sites and states that the Council will not permit development adversely affecting a Site of Biological Importance (SBI), without a proper assessment being made of the nature conservation value of the site in relation to the development benefits. It further states that where loss or damage would occur and the need for development outweighs the protection of the habitat, this must be compensated for by habitat recreation or enhancement of an equivalent or greater area elsewhere within the site or the surrounding area. This approach is consistent with guidance within paragraph 180(a) of the framework, which alludes to mitigating against any harm to biodiversity.
- 28.10 Policy N3 of the UDP relates to nature conservation factors and states that developments must take into account the potential benefits to nature conservation within the design of the scheme including any opportunities to help create or enhance wildlife habitats and increase biodiversity in both urban and rural locations. Nature conservation factors should be addressed in the design of new areas of tree or shrub planting and landscaping.

- 28.11 Policy N6 of the UDP refers to the protection and enhancement of Waterside areas. Policy N6 states the Council will permit developments alongside watercourses so long as they:
- (a) allow for the retention or creation of a "green" corridor following the watercourse, wherever possible and at least along one side, and
 - (b) include improvements where appropriate to existing waterside features, and
 - (c) enable the waterside environment and its ecology to be enhanced generally, avoiding the creation of a backyard character, and
 - (d) do not involve watercourses being culverted and, where appropriate and in accordance with Environment Agency policy, include the removal of existing culverts, and
 - (e) avoid erosion or destruction of established habitats and associate species, and.
 - (f) encourage the provision of new habitats in appropriate locations, and
 - (g) protect valuable floodplain habitats from development, and
 - (h) open up waterside land and frontages to public access where appropriate.
- 28.12 Policy N7 refers to protected species and states that the Council will not permit development which would have an adverse impact on badgers or species protected by Schedules 1, 5 and 8 of the Wildlife and Countryside Act as amended, unless it can be demonstrated by the applicant that any such impact can be successfully mitigated and the population status of the species be maintained at current levels.
- 28.13 PFE Policy JP-G9 seeks to achieve a net enhancement of biodiversity resources. For development, this means following the mitigation hierarchy, achieving a measurable net gain in biodiversity of no less than 10%, making appropriate provision for long-term management of habitats connected to the development, and being informed by findings of appropriate ecological assessments. The site allocation policy JP Allocation 31 requires development to make provision for biodiversity, including taking appropriate account of the designated SBIs within the allocation boundary in accordance with JP-G9.
- 28.14 The site contains areas that have been designated for their ecological importance which includes SBIs at Brookfold Wood, Werneth Brook and Back Wood. Outside of these designated areas, the site also supports habitats including areas of woodland, grassland, ponds, hedgerows, brooks and streams. The site also sits within 7km of the South Pennine Moors SAC/SPA, which is a European Protected site.
- 28.15 There would be no direct encroachment within the identified SBI's included the areas of Ancient Woodland. Their importance as areas of high value woodland and grassland habitats would be preserved, although it is noted that public access would need to be limited within the buffer zones that border SBI boundary.
- 28.16 Outside of the SBI boundary, there would be new areas of greenspace, these will generally follow the alignment of the watercourses and hedgerows which cross the site. These new habitats, along with management of the retained areas, would appropriately mitigate the associated impacts of the development. There would be opportunity to ensure that on site biodiversity net gain can be achieved by bringing the retained habitat up to a much improved condition. This in turn would secure the diversification of native flora and wildlife habitat on the site.
- 28.17 A habitat management plan along with a construction and environment method plan can be secured by appropriately worded conditions to ensure that development impacts are appropriately mitigated and an overall biodiversity improvement achieved. This would also include the appointment of an ecological/environmental clerk of works to oversee the construction of the development and future management of the sites SBI's. Subject to these measures there would be no conflict arising from the development against policy N2.
- 28.18 GMEU conclude that it would be possible to allow the development without causing levels of unacceptable harm to nature conservation interests, including measures in relation to Great

Crested Newts and other protected species, although updated surveys and further details of mitigation and biodiversity enhancement will be required to inform subsequent reserved matters applications. Therefore, subject to the inclusion of appropriate conditions to be added to any grant of planning permission, the application is considered acceptable in terms of biodiversity and ecological impacts.

- 28.19 PfE Policy JP-G5 requires that new development does not have an adverse impact on protected habitats of the South Pennine Moors SAC, the Peak District Moors SPA or the South Pennine Moors Phase 2 SPA. Criterion 7(c) of Policy JP-G5 requires that within 7km of the SAC and SPA boundaries, new residential development will be required to mitigate recreation disturbance impacts and goes on to list JP Allocation 31 'Godley Green Garden Village' as being an allocation to which this criterion applies. The allocation policy JPA31 also requires development to mitigate the recreation disturbance on the South Pennine Moors SAC/SPAs in accordance with JP-G5 criterion 7(c)
- 28.20 The application site is within 7km South Pennine Moors SAC/SPA and it is acknowledged that potential recreational impacts from development on the site could impact these designated sites. Currently, approximately 1% of the site is publicly accessible. The application seeks to deliver a significant level of green infrastructure with over 50% of the site proposed to be made publicly accessible to the amenity benefit of future residents and existing communities. This will include 47 hectares of natural space/countryside (excluding areas of Ancient Woodland and SBI) and 3.23 hectares of amenity open space. It is anticipated that the inclusion of substantial areas of natural green space and increased accessibility of these spaces will offset the potential recreational impacts by reducing the need for residents to travel for outdoor recreation. The site is also adjacent to established walking routes in Werneth Low Country Park, and the Trans Pennine Trail also runs through the site.
- 28.21 GMEU has been consulted and with regard to impact on these designated sites defer to the advice of Natural England in this matter. Natural England raise no objection to the proposal stating they do not consider there will be significant adverse impacts on statutorily protected nature conservation sites. The application is therefore considered acceptable in this regard.
- 28.22 Whilst there would be inevitable loss and disturbance to habitats as a direct result of the development it has been demonstrated that these impacts can be suitably mitigated in line with national and local planning policy. Further, the ability for the development to achieve an overall 10% BNG, along with general management of established habitats, would be a tangible benefit which carries moderate positive weight in the planning balance.

29. TREES & WOODLANDS

Applicant's case

- 29.1 A Tree Survey and Arboricultural Impact Assessment (AIA) have been undertaken by the applicant. The survey has identified that tree coverage accounts for approximately 25% of the site. The coverage includes woodland blocks, groups and individual trees. Woodland blocks are located along the northern and western boundaries with scattered groups and trees across the central field network, many of which are lapsed hedgerows. An ancient woodland, Brookfold Wood, is located centre-north of the site. Although the mapping suggests only part of it is designated as ancient woodland, there is no discernible difference between tree age, diversity and structure, condition and ground flora across the site.
- 29.2 In addition, the applicant identifies 112 individual trees, 179 groups of trees, 5 woodland compartments and 12 hedges within influencing distances of the site. There is a large number of protected trees and woodlands in the central, northern and eastern areas of the site.
- 29.3 The AIA confirms that the points of access to the site would necessitate the removal of 1 individual tree (category B); 3 tree groups covering approximately 0.2 hectares (2 category

C, 1 category B); and 143 metres of hedgerow. The accompanying masterplan and parameters plan set out how trees will otherwise be protected across the site. Whilst these trees are required to be removed, the vast majority would be retained. In addition to dedicated areas of landscape planting, the accompanying masterplan and parameters plan have been designed to support street trees, as per the NPPF, where the provision of these would be determined as part of the access and landscaping details of future reserved matters.

- 29.4 A buffer would be created between the ancient woodland and the areas to be developed. It would follow topographical features and established hedgerows on the site. The applicant states that the proposed scheme will retain and enhance the vast majority of Brookfold Wood SBI and Werneth Brook, including a minimum 15m buffer from the designation boundaries, and a maximum of 169m. An Ancient Woodland Mitigation Strategy has been submitted by the applicant, which includes the improvement of existing PRowS promoting movement around the woodland and the limitation of vehicular interaction with the woodland edge.
- 29.5 Appendix 8.12 of the Environmental Statement provides an addendum to the AIA and highlights the buffer zones proposed and the separation distances maintained with areas of key arboricultural interest. It is acknowledged that there will be some impact to the trees within the application site, throughout various stages of development. Mitigation measures including the replanting to account for lost trees, the preservation of sufficient boundary buffer zones to ensure the preservation of the SBI's and Ancient Woodland. The applicant states that the harm caused to the trees as a result of the development would not be significant and could be mitigated through the use of replacement planting and buffer zones, such that the harm is not significant enough to warrant refusal.

The Council's assessment

- 29.6 Paragraph 180 (c) of the NPPF states that development must not result in loss or deterioration of ancient woodland unless wholly exceptional reasons and a suitable compensation strategy exist. In practice, harm to ancient woodland would constitute grounds for refusal of the majority of planning applications that are not nationally significant. It is therefore necessary to demonstrate no adverse effects would occur.

Policy N4 of the UDP refers to Trees and Woodland. It states that trees and woodlands should not be removed subject to the following exceptions:

- The removal of the tree has been considered appropriate in connection with an approved development, or
- Good arboricultural practice requires that the tree should be felled or
- The condition or safety of structures is conclusively proven to be adversely affected by the presence or growth of a tree, or
- A serious risk to public safety is presented by the tree

- 29.7 The policy then states that where a tree is removed the Council will require appropriate replacement planting. Trees protected by tree preservation order (must be replaced with a similar species).
- 29.8 Policy N5 relates to Trees Within Development Sites. The policy requires a full arboricultural impact assessment, survey and method statement to be undertaken and submitted, to enable the effect of the proposal on the trees to be properly assessed and proposals made for the best of the trees to be accommodated.
- 29.9 The consultation response from the Council's Arboricultural Officer states that the AIA is adequate for the purposes of the outline application. However, other matters must be assessed in the reserved matters and will be managed through the inclusion of conditions on any subsequent approvals. Likewise, the Forestry Commission has raised no objections subject to conditions relevant to the protection of the ancient woodland.

- 29.10 The Woodlands Trust has raised an objection to the extent of the buffer zone to the Ancient Woodland, their preference being a universal 100m from the woodland boundary. However, Natural England's guidance confirms that a minimum 15m buffer from the woodland boundary should be observed, to which the development accords with this guidance. A habitat management plan can be secured by an appropriately worded condition to ensure future stewardship and protection is afforded to the Ancient Woodland to protect its unique environment.
- 29.11 Whilst it must be acknowledged that a degree of harm is inevitable as a result of enabling access to more of the site, officers are satisfied that the harm would be minimal and would not amount to material deterioration of the ancient woodland, nor result in its loss.
- 29.12 The mitigation measures included in the AIA include the buffer zones and replacement planting. These are acceptable within the context of protecting the trees and providing for bio-diversity net gain. Mitigation can be secured within the parameters of the proposed development by condition. Through the application of conditions. Full detailed landscaping plans. assessments submitted with any subsequent reserved matters application should reflect the presumption that all the trees and woodlands are valuable amenity assets and should be incorporated into the scheme with no detrimental effects.
- 29.13 The submitted parameters plan and AIA confirm that a final detailed layout could be developed which would retain all high quality trees and ensure there is no deterioration or loss to the ancient woodland. However, subsequent AIAs would need to be undertaken in support of future reserved matters application to ensure no undue impact occurs. There will be a significant level of new planting throughout the site including to highways and open spaces. There is opportunity to raise the amenity and ecological value of tree cover within the site. National and local policy is complied with. In the planning balance, there would be a limited beneficial impact.

30. DRAINAGE AND FLOOD RISK

Applicant's case

- 30.1 There are 4 watercourses within the site which drain via culverts across the northern boundary. These watercourses are fed by a network of minor watercourses. Site assessments have identified that a central area of the site experiences saturated ground in periods of wet weather, where the assessment sets out that this is due to the topography and poor ground conditions. It not identified as a significant flood risk and can be addressed as part of pre-commencement mitigations addressed via planning conditions. Drainage is provided by a network of drains and ditches that flow into Godley and Werneth Brooks that flow south to north through the site
- 30.2 The applicant has described an overarching drainage strategy and states that the principal aim is to retain the natural characteristics of the watercourses by mimicking the current flow regimes as much as possible. The existing topography and network of drains and ditches will be retained to enable the creation of multiple discrete surface water drainage networks, associated attenuation and local and distributed outfalls. Development plots would be drained individually rather than through a strategic, site wide system. Surface water runoff would drain to existing watercourses controlled to greenfield run off rates through the use of sustainable drainage systems and attenuation features. The application is also accompanied by indicative drainage designs to show that the principles are deliverable within the development proposals.
- 30.3 A surface water drainage assessment has been undertaken for the development catchment. The applicant states that the assessment shows that the development would cause no detriment to existing watershed and overland flow route scenarios. Assessment of the

illustrative masterplan shows that the watershed, flow paths and flood envelopes would not be significantly impacted by the proposals.

- 30.4 The Flood Risk Assessment (FRA) considers a range of risks of flooding at the site including an event of culvert blockages, this exercise confirmed that even in the very unlikely scenario of 100% blockage, together with 100% catchment saturation, floodwater would collect in the deep valleys on the site and would not affect any areas proposed for built development. In addition, the assessment has proven that there would be no risk to existing properties downstream of the development. The risk of flooding is low. The applicant proposes that the condition/maintenance/repair of the culverts be addressed as part of a pre-commencement condition to the development.
- 30.5 The FRA acknowledges that further groundwater investigation is required ahead of any detailed design relevant to reserved matters proposals. The housing layout and levels have yet to be confirmed and so a 60% impermeability has been assumed for all parcels.
- 30.6 The drainage strategy has been prepared based upon theoretical approaches to how different environments within the site could be drained in accordance with the drainage hierarchy. The information does not include any hydraulic modelling of the watercourses within the site or the associated supporting infrastructure (culverts) which they are dependent upon. These are matters which the applicant and consultees identify needs to be secured by condition. Such a condition will require full detailed drainage strategy to be developed as an initial phase of site infrastructure works.
- 30.7 In summary, the applicant states that the surface water drainage proposals include a range of potential sustainable drainage features that demonstrate the means by which a detailed design would appropriately drain the site.
- 30.8 The drainage strategy also includes options for foul drainage, which set out that there are multiple solutions to discharging wastewater from the site. This would be confirmed in subsequent reserved matters planning applications.

The Council's assessment

- 30.9 Paragraph 159 of the NPPF seeks to steer development away from areas at risk of flooding to ensure development is safe from flood risk and to avoid increased flood risk elsewhere. The site is located in flood zone 1 and at the lowest risk of fluvial flooding (less than a 1 in 1,000 annual probability) of suffering from river flooding.
- 30.10 Paragraph 169 states that major developments should incorporate sustainable urban drainage systems (SUDS) unless there is clear evidence that this would be inappropriate. SUDS 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.
- 30.11 UDP policy U4 states that when considering proposals for development the Council will apply a risk-based approach to the assessment of possible flooding, taking into account the Environment Agency's (EA) most recent Indicative Flood Plain Maps and any other relevant sources of information. It further advises that the Council will consult the EA in any such assessment and will consider, among other things, whether the development would be at direct risk of flooding, likely to increase the risk of flooding elsewhere, likely to obstruct the flow of flood waters, or likely to interfere with the integrity of existing flood defences.

- 30.12 The principle aim of the drainage strategy is to retain the natural characteristics of the watercourses by mimicking the current flow regimes as much as possible. Each phase of the development would drain via an attenuated system, the outfall from which would discharge to these existing watercourses at a controlled greenfield rate, and thus not give rise to flooding issues offsite. The surface water drainage strategy proposed is for a hybrid infiltration / storage-based approach whereby surface water runoff would be attenuated via the use of swales, rain gardens and above ground storage basins. In some instances, it will be a requirement for underground storage, but this, like other aspects of the drainage, will still discharge to a watercourse at greenfield rates. The drainage strategy along with the overall design approach to the development would not require any significant alteration to ground levels, which in the main would remain unaltered.
- 30.13 During the course of the application, the FRA and indicative drainage strategy have been amended. All of the information has been reviewed by the Lead Local Flood Authority (LLFA), United Utilities (UU) and the Environment Agency (EA). No objections to the proposals are raised, subject to recommended conditions. Based upon the drainage principles the proposals as presented would be compliant with the drainage hierarchy and the development can be designed to be SUDS compliant. The approach is therefore accepted.
- 30.14 In terms of foul water, there is a foul drain located within the site and measures to connect to this will be explored, in addition pumping arrangements to connect within the existing infrastructure with the Mottram Old Road (A560) will also be explored. As per the surface water drainage strategy it is recommended that the detailed design be subject to an appropriately worded condition and would be a matter to be agreed as part of further reserved matter applications.
- 30.15 It is accepted that the application is in outline and as such, the applicant is of the view that use of conditions as stated is appropriate. It is agreed that the drainage strategy has been adequately explored for the purposes of an outline permission and that there is sufficient environmental information available such that a judgement on the likely environmental effects of the development can be made. The site would be drained using a variety of sustainable drainage features in accordance with drainage hierarchy. Full details would be explored through future submissions. As such, the requirements of policy U4 and the NPPF have been adequately addressed. Within the context of the above, drainage is neutral in the overall planning balance.

31. GROUND CONDITIONS

Applicant's case

- 31.1 The applicant has submitted a Phase I Geo-Environmental Site Assessment and Phase II Geo Environmental Site Assessment for the site, alongside Ground Gas Addendum reports.
- 31.2 The Phase I Site Assessment, which covers the entire site north of Mottram Old Road, identifies that two former landfill sites and several areas of potentially infilled ground are within the site boundary. It notes that during the site reconnaissance, limited made ground was observed. However, the potential for deep made ground was considered likely in some areas associated with historical features (such as farmyards and former sidings). The assessment considers that potential contamination sources affecting the site were identified as heavy metals, PAHs, sulphate, asbestos, hydrocarbons and gas (carbon dioxide and methane). Although the information states that these contaminants are encountered on the vast majority of redevelopment sites in Tameside, the assessment considered that these might pose a risk to site users (via ingestion, dermal contact, inhalation pathways and explosion), controlled waters (via migration through permeable strata and preferential pathways), buildings and structures (direct contact and explosion), water pipes (direct contact) and flora (root uptake). The Council's Contaminated Land Officers consider that the information provided through

this assessment is satisfactory, identifying the pertinent points regarding the potential contamination issues for the area north of Mottram Old Road.

- 31.3 The Phase II Site Assessment covers the western and central sectors of the wider site. This assessment identified made ground deposits discovered through exploratory holes, and it was considered that the made ground is associated with the historical landfill at the centre of the site and infilled sand pits, however it was clarified that visual and olfactory evidence of potential contamination was not identified during the site investigation. Soil samples were taken from exploratory positions, and once screened it was confirmed that there was presence of elevated lead, benzo(b)fluoranthene, benzo(a)pyrene and asbestos. It was however confirmed that there were no visual signs of asbestos containing materials during the ground investigation. Although the soil sampling exercise is limited due to the exploratory nature and the relative low density nature of the investigations, the analysis and the contaminants identified to date would appear to be typical of the vast majority of redevelopment sites in the area. The submitted information advised that all of the identified elevated concentrations have primary exposure pathways related to dermal contact and ingestion of soils, inhalation of particulates and consumption of home grown vegetables. It confirms that the risks to chronic human health associated with the elevated concentrations of inorganic heavy metals and non-volatile PAH compounds can be mitigated through the installation of a suitable cover system in locations where made ground is located in proposed private gardens, landscaping and public open space, and the specific design and installation process for appropriate cover systems will be clearly defined within a site remediation and enabling works strategy. Installation of an appropriately robust soil cover system in future residential garden areas, landscaping and open spaces is a usual approach on most sites to rectify soils impacted with contaminants. Regarding the low volumes of asbestos found in two locations, it is considered that impacted soils should be managed according to their asbestos risk mitigation conceptual site model, in order to ensure that asbestos impacted soils are not located in future sensitive garden, landscaped or open space areas. The Phase II Assessment recommends a number of future measures, including extensive further ground investigation for each development parcel, and further ground gas monitoring.
- 31.4 In relation to initial gas monitoring results, the assessment confirms that for areas outside of the landfill, based on the peak flow rates and concentrations, these locations could be classified as very low gas risk. However, the assessment states that there is no data recorded in all areas including the historically infilled sand pit or historical landfill sites, and therefore further precautionary mitigation measures are recommended. When considering waste deposit infilled in the landfill in the central and western sectors of the site, ground conditions concur with the deposit types approved for infilling by the Environment Agency, and are not considered a significant potential ground gas generation source. The low organic content recorded in the borehole logs are not suggestive of strong gas generation potential. When compared to the landfill in the eastern sector of the site, the depths, and volumes of made ground in that area were much greater than those encountered in the central sector. In addition, they covered a much wider area, and it was concluded that that area could be developed following further assessment and appropriate remedial works and mitigation measures.
- 31.5 Whilst a significant ground gas risk is not anticipated in the central sector of the site, it was advised that there are remediation and mitigation measures that can be taken, should a ground gas risk be identified. This could include the delineation of any made ground deposits, which could then be excavated and removed, with placement in an area of low sensitivity or removed from the site entirely. This would remove the potential ground gas source and pathway, reducing the risk to residential receptors. Any resultant excavation would require backfilling, in order to ensure there is no ground gas generation potential.
- 31.6 It is recommended that ground gas mitigation measures could also be utilised for future buildings at the site, which is a usual measure undertaken on most brownfield developments. This could include provision of a sub-floor void ventilation and gas resistant membrane, or

revision of the draft layout to relocate dwellings away from the central area, for example. Although the assessment confirmed that made ground encountered in the central sectors is of limited thickness, significant volumes of such are not anticipated. The risks from potential ground gases are not considered to be high and the central and western sectors of the wider site would be developable for a residential end use. However, further investigation of the historical landfill sites and infilled sand pits is required.

- 31.7 Regarding the eastern sector of the site, this area has been mostly utilised for farming with no previous large scale developments undertaken. However, a number of former landfills are located in this area and within influencing distance of the site. Soil sampling in this area identified concentrations of non-volatile, insoluble heavy materials and hydrocarbon compounds that would present unacceptable degrees of theoretical risk to the identified receptors. Consequently, it would be necessary to design and construct the development in a manner that will ensure suitably validated cover systems for all areas of private garden, soft landscaping and public open space. Trace asbestos fibres identified within two locations of this area of the site would require careful management and placement of anthropogenic materials.
- 31.8 Localised areas of volatile/semi-volatile hydrocarbon impact have been identified within a particular area of the eastern sector. These compounds pose a theoretical risk associated with volatilisation and subsequent ingress into the proposed dwellings, and therefore it would be necessary to delineate the extent of impact and ensure all material is excavated, analysed and treated for either reuse within an area of low sensitivity, or removed from the site. Further investigation, soil sampling and analysis may be required as part of the enabling works. For areas where made ground is present and based on the results of analysis, it is considered that a cover system would be required in all private gardens where appropriate. A deeper and more robust cover system would then also be required for development on the former landfilled areas. Although chemical analysis has identified soils to be acceptable for use as subsoil and topsoil within proposed garden areas, further chemical validation samples would be required to confirm such.
- 31.9 Ground gas recording took place within the eastern sector of the site, and within those areas outside of the landfill areas, a very low gas risk was identified. Within infilled/made ground areas, there were recorded elevated levels of carbon dioxide and methane. No odours were noted during the gas monitoring period, and no significant visual or olfactory impact was noted within the historical landfill area. Slight hydrocarbon odours were noted in some areas, however these were not recorded in the area of made ground within the landfill area, therefore suggesting that the hydrocarbons are not the source of the elevated ground gas concentrations. The elevated concentrations of ground gasses were mostly encountered in wells with made ground and infilled deposits. The results do not suggest a strong gas generation potential and reflects the results predominantly recorded in the installations within the historical landfill site. However, it is considered that the landfill area will need to undergo cut/fill enabling works to allow the creation of a developable platform, and remediation works would also be required to address the potential risk to human health. Post-enabling works ground gas monitoring is therefore recommended to be undertaken on a parcel-by-parcel basis. Overall, it is considered that the eastern sector of the wider site, including the landfill area, will be developable for residential housing following a phase of remediation and enabling works.
- 31.10 Regarding the site south of Mottram Old Road, this area has remained undeveloped agricultural land. However, the former Apple Street landfill site encroaches onto the proposed development area. Other than the landfill site, there are no significant potential sources of contamination on this section of the site. The main development proposed within this area is the proposed sports changing facility, and the site of the former landfill will require investigation to determine if landfill material falls beneath the footprint of the proposed changing facility.

31.11 No made ground was encountered within the southern area, and soil descriptions including topsoil only include natural superficial deposits. However, only limited exploratory works have been undertaken in the area, and no discussion on the potential contamination issues has been included in the submitted information. It is noted that the end use for this area is for a nature reserve and whilst additional contaminated land information will be required for this area, this can be provided at a later stage subject to the conditions imposed.

The Council's assessment

31.12 Paragraph 174 of the NPPF states that decisions should contribute to and enhance the natural and local environment by preventing new and existing development from contributing to, being put at an 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. It also states that the remediation and mitigation of despoiled, degraded, derelict, contaminated and unstable land should take place, where appropriate.

31.13 Paragraph 183 of the NPPF states that planning decisions should ensure that 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). After remediation, as a minimum, land should not be capable of being determined as contaminated land, and adequate site investigation information, prepared by a competent person, should be available to inform these assessments.

31.14 Paragraph 184 of the NPPF states that where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.

31.15 UDP policy MW11 states that development of contaminated land will be permitted provided that it can be demonstrated through appropriate investigation that the site can be developed for its intended use.

31.16 The Council's Contaminated Land Officers consider that the submitted information is broadly exploratory in nature, rather than it being a detailed contamination appraisal. However, it demonstrates that development is possible at the site when considering potential contamination issues.

31.17 In relation to soils, the information provided appears satisfactory and confirms that remedial measures can be undertaken to mitigate soil contamination.

31.18 In relation to ground gas, there is sufficient information to demonstrate that concentrations do not preclude development for the eastern and southern sectors of the site. However only limited ground gas monitoring had been undertaken in the central and western area and none from the three landfills located in this area. Consequently, a ground gas addendum report was produced, which concludes that the potential contamination issues and ground gas regime would not prevent development within this area.

31.19 The Contaminated Land Officers recommend conditions be attached, to require further investigation and monitoring and to address the potential contamination issues discussed above. The conditions require submission of a preliminary risk assessment, followed by a detailed site investigation strategy, and an options appraisal and remediation strategy as necessary. Following implementation of the works, a verification plan would be required to be submitted in order to demonstrate the required have been carried out, and any requirements for long term monitoring and maintenance.

- 31.20 The Environment Agency also note that the eastern sector of the site was predominantly influenced by the presence of a known, formerly licensed, landfilled area. Due to this, it would mean a departure from the standard approach to remediating brownfield land and could have additional influences on future permitting and requirement for reuse of materials. However, the Environment Agency consider that it should be possible to manage the risks posed to controlled waters by this development. They say that further detailed information will be required before built development is undertaken, including creating a detailed conceptual site model for the water environment so that interactions and interfaces with groundwater and surface from the formerly deposited waste materials were fully identified, understood and could be robustly assessed. This would assist with future material management plans and possible needs to seek and gain sufficient permitting from the Environment Agency if required. The Environment Agency thereby recommend a number of conditions in order to ensure no unacceptable risk or levels of water pollution.
- 31.21 The Coal Authority has reviewed the submitted application. Whilst it is noted that the site falls within the coalfield, it is located just outside of the defined Development High Risk Area, meaning that there are no recorded coal mining legacy hazards at shallow depth which could pose a risk to land stability. The Coal Authority therefore raise no objections to the proposed development, but recommend an informative is imposed on any decision informing the applicant of the risks of any unrecorded coal mining related hazards.
- 31.22 Subject to the recommended conditions, it is considered that the intended development could be accommodated safely, with contamination issues investigated and resolved, and the issue to human health minimised. The application therefore accords with MW11 of the Unitary Development Plan and the National Planning Policy Framework, accordingly this factor would be a neutral in the overall planning balance.

32. HISTORIC ENVIRONMENT

Applicants Case

Archaeology

- 32.1 The Environmental Statement (ES) identifies that the site straddles the former townships of Hattersley (to the east of Godley Brook and south of Brookfold Wood) and Godley (to the west of the brook). Both townships were known to have been in existence by the 13 Century and the site was predominantly in agricultural use throughout the post medieval period.
- 32.2 The ES states that the presence, nature, extent, and importance of the archaeological resource within the site is largely unknown. However, it is acknowledged that there are three broad areas considered to be of general archaeological potential, particularly for remains of prehistoric or Roman date, located to the west of Green Lane, to the east of Brookfold Wood, and to the east of Greenside.
- 32.3 The applicant accepts that the impact upon potential archaeological remains would occur during the construction phase. Mitigation considered necessary would be implemented prior to or during this phase of development to ensure that archaeological remains are preserved in a manner applicable to their significance, in accordance with paragraph 205 of the NPPF. It is therefore recommended that an appropriate programme of investigation and subsequent mitigation is to be agreed in consultation with the Greater Manchester Archaeological Advisory Service (GMAAS).
- 32.4 The submitted Archaeological Desk Based Assessment has identified that there will be potential impact to four non-designated heritage assets: a historic hedgerow located at Greenside Farm, the site of a pre-1700 farmstead known as Oliverfield Farm, the pre 1700 farmstead at Greenside Farm and Godley Green (common land/ field system). The Archaeological Assessment also identifies that the proposed development has the potential

to truncate or remove currently unknown buried archaeology, in particular remains of Prehistoric and Romano-British date.

- 32.5 The Archaeological Desk Based Assessment recommends that a programme of archaeological works takes place before construction to mitigate against any harm to non-designated heritage assets and to evaluate the potential of the site to contain currently unknown buried archaeology. The Assessment also recommends that any residual potential harm to the historic environment resource could be addressed by a suitably worded condition attached to the planning consent.
- 32.6 The ES Addendum notes that subsequent geophysical survey work has been undertaken to supplement the Archaeological Desk Based Assessment to enhance the understanding of the subsurface archaeological potential. As such GMASS recommend a condition requiring further archaeological investigation at a subsequent planning stage and that this could be delivered on a phased basis as the project was delivered.
- 32.7 The submitted Historic Environment Assessment considers there to be high potential for archaeological remains due to the lack of disturbance and that the landscape setting shows that there is potential for archaeological remains. However, the greater potential lies on the flatter areas which lie predominantly within the eastern and western parts of the Site. The Historic Environment Assessment also identifies the high potential at Dove House, but unlike the Environment Statement considers that 'any remains have the potential to be of high local/regional importance.'
- 32.8 The Historic Environment Assessment recommends a programme of archaeological field investigation pre-application, ideally undertaken at an early enough stage that the results can feed into the emerging masterplan. The treatment of remains could take the form of in situ preservation, where any highly significant buried archaeological remains could be incorporated into the 'green infrastructure'. For remains of lesser importance, an archaeological excavation in advance of development is recommended, where the buried remains are excavated and recorded prior to their ultimate loss.
- 32.9 Paragraph 7.279 of the Planning Statement also notes the archaeological potential in areas such as around Greenside, east of Brookfold Wood, Green Lane, north of Brookfold Wood, Dove House Farm, and Godley Green Farm. It concludes that with mitigation measures in place, the resultant effect is acceptable and in accordance with Policy C10 of the UDP and the relevant provisions of the NPPF.

Built Heritage

- 32.10 The submitted Historic Environment Assessment describes the built heritage across the site as mainly consisting of isolated farmsteads, with a small hamlet identified at Greenside. The earliest buildings on the site date to the mid-17 century with surviving built heritage reflecting the gradual settlement and farming of the landscape from the post-medieval period onwards. Later settlement in the 19th century is characterised by large, detached villa properties on Green Lane, built within the then newly enclosed Godley Green common land. The applicant states that it is possible that some of the farmsteads and settlements within and immediately adjacent to the site have medieval antecedents, and there may be some potential that settlement and / or structural remains associated with these extend into the site itself.

Designated Heritage Assets

- 32.11 The ES Archaeological Desk Based Assessment and Historic Environment Assessment confirm that there are no designated heritage assets within the application site. The closest designated heritage asset is Hyde War Memorial Obelisk (Grade II Listed), which is located approximately 250m to the south of the site on the crest of Werneth Low. The Historic Environment Assessment notes that whilst the development site is not considered to contribute to the setting of the War Memorial there are prominent views of it from the western part of the site that should be taken into consideration. However, the ES observes that the

impact of the proposed development would be negligible on significance as the structure will remain widely visible from within the wider surrounding landscape. The Planning Statement concludes the development accords with national and local planning policy.

Non-Designated Built Heritage Assets

- 32.12 The ES acknowledges that there are extant (non-designated) buildings present within the site. Of these four have been identified as being of heritage interest and comprise a farmhouse and attached barn complex at 6 Greenside, and a cottage and barn at Brookfold Farm. However, the non-listed historic buildings within the immediate proximity to the proposed development have been excluded from the current redline boundary. The ES states that these buildings are of low importance, derived primarily from their physical fabric with some contribution provided by their immediate contexts. However, the ES Addendum notes that although the condition of the barn at Greenside Farm has deteriorated since the submission of the planning application, this barn, along with the adjoining farmhouse, have been identified as an undesignated heritage asset of high local importance.
- 32.13 The ES identifies embedded mitigation measures that have been incorporated into the design to minimise the impact of the proposed development on non-designated built heritage assets. These include the retention of the identified historic buildings at 6 Greenside and Brookfold Farm together with the retention of existing vegetation screening and the introduction of planting around settlement areas to minimise issues that may arise through the alteration of setting. Additional mitigation measures include the proposed provision of open space to the west of the historic buildings at Greenside, to the west of Albert's Farm/Ashwyn, and around Brookfold Farm to maintain a connection between these assets and the existing rural landscape and lower density of housing is proposed adjacent to the majority of the non-designated buildings at Godley Green.
- 32.14 The submitted Archaeological Desk-Based Assessment identifies the potential harmful physical impact to four non-designated heritage assets within the site that will be impacted by the proposed development. They comprise two post medieval farmsteads at (former site of) Oliverfield Farm and Butterworths Farm (later known as Greenside Farm), a hedgerow located at Greenside Farm and the historic field system at Godley Green. This Assessment goes on to recommend that the historic farm buildings at these locations be incorporated into the design if possible.
- 32.15 Conversely, Table 2 in the Historic Environment Assessment identifies additional non-designated built heritage assets within the setting of the site boundary (and subsequently not included within the Environment Statement), to be of either regional and/ or high local significance. These include Nos. 2, 2a (and attached outbuilding), 4 (and combination barn) and 6 Greenside, Chadwicks/ Godley Green Farm, Alberts Farm, Brookfold Farm and Iddesleigh.
- 32.16 It is recommended that, to minimise the potential impact of the development on the setting of non-designated built heritage assets, consideration of plan and design, incorporation of views, buffer zones and enhanced screening and the retention of hedgerows and current residential plots should be undertaken.
- 32.17 The Planning Statement considers non designated heritage assets both within the site and those within its setting. it says that the benefits of the scheme clearly and substantially outweigh the limited harm identified to these heritage assets of low importance. On that basis it is considered that no policy conflict exists.'

Historic Landscape

- 32.18 The ES sets out that that the site retains an agricultural character, consistent with its use since at least the post medieval period, and concludes that these forms of field enclosure are well-represented regionally and are of low importance. It is recommended that the development will alter the historic character.

- 32.19 The ES sets out the mitigation measures which have been embedded into the development, including the preservation of the majority of hedgerows and tree lines defining historic field systems, historic route ways and ponds (former marl pits). The applicant states that these measures would result in no significant effects upon the assets as a result of alteration to their settings.'
- 32.20 The submitted Archaeological Desk Based Assessment states that there is potential to impact a historic hedgerow located at Greenside Farm. It is recommended that this hedgerow be preserved in the design of the scheme and should be incorporated into the landscaping to mitigate this potential impact.
- 32.21 The Historic Environment Assessment has also analysed the historic landscape within the site and notes various surviving historic landscape features including surviving field systems and boundaries, tree lines and hedgerows relating to the historic land use of the site. The Assessment also highlights the legacy of historic routeways comprising the path along Green Lane to Brookfold, the former turn pike road (A560) which marks the site boundary to the south and the former ralline, now the Trans Pennine Trail to the north. Of additional interest is Brookfold Wood designated as an area of ancient/ semi natural woodland and a number of isolated ponds scattered across the site and interpreted as marl pits. The Assessment recommends that as these features possess some historic archaeological significance, that they be retained and incorporated into the green infrastructure of the site.

Conclusion

- 32.22 The Planning Statement states that in assessing the acceptability of the proposal's impact on non-designated heritage assets there are a series of minor benefits, negligible and minor adverse impacts arising from the proposal. On balance, the applicant considers that there is an overall neutral impact

The Council Assessment

- 32.23 Paragraph 194 of the NPPF states that local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on their significance. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment, and where necessary a field evaluation.
- 32.24 The findings, assessments and recommendations set out in the submitted Planning Statement, Environment Statement (and Addendum), Archaeological Desk Based Assessment and Historic Environment Assessment have been considered. Whilst the presence, nature, extent, and importance of the archaeological resource within the site is largely unknown, there is potential for archaeological remains of prehistoric or Roman date located to the west of Green Lane, to the east of Brookfold Wood, and to the east of Greenside. There are also other areas and features with potential archaeological interest identified in the Archaeological Desk Based Assessment and Historic Environment Assessment including the historic hedgerow located at Greenside Farm, the former sites of pre-1700 farmsteads known as Oliverfield Farm and Dove House Farm, the pre 1700 farmstead at Greenside Farm and Godley Green (common land/ field system) alongside field names associated within C19 industrialisation. However, it is accepted that the archaeological potential across the site is likely to be only of local and / or regional importance.
- 32.25 Given that the proposed development has the potential to truncate or remove currently unknown buried archaeology and in line with UDP Policy C10 it is strongly recommended that a suitable level of investigation is undertaken within areas of known or suspected

archaeological importance and where practical advocates measures to facilitate the conservation, accessibility and interpretation of archaeological remains. The recommendation from GMAAS is supported that additional assessments of archaeological potential should be undertaken guided by existing documentation and that a planning condition for further archaeological investigation at a subsequent planning stage and that this could be delivered on a phased basis as the project was delivered.

- 32.26 NPPF paragraph 195 states that '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 the 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 assets conservation and any aspect of the proposal.' Paragraph 197a) of the NPPF states that in 'determining applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets', whilst paragraph 200 maintains that 'any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.'
- 32.27 Whilst there are no designated heritage assets located within the site boundary UDP Policy C6 is also relevant. It states that any harm or loss of significance from development within the setting of designated heritage which fails to preserve, or detracts from, the setting of a listed building or structure will not be permitted. Having reviewed the submitted assessments, the impact on the setting of designated heritage assets located outside of the site boundary will result in less than substantial harm and therefore comply with NPPF paragraphs 195, 197 and 200 and UDP Policy C6.
- 32.28 Paragraph 203 of the NPPF states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 32.29 In relation to the identified non-designated heritage assets, including historic landscape features, there are inconsistencies between the extent of the assessment area covered, the non-designated heritage assets identified and subsequent assessment of their level of significance. In this instance a cautious and inclusive approach is supported where a level of harm arises from the development particularly those within the site boundary and within its setting (properties on Green Lane and at the historic agricultural hamlet at Greenside).
- 32.30 The recommendations to mitigate and minimise the impacts of the development on the identified non-designated heritage assets including consideration of plan and design, incorporation of views, buffer zones and enhanced screening and the retention of hedgerows and current residential plots are supported, as is the recommendation to retain, enhance and incorporate into the green infrastructure within the site. Conditions would thus ensure that the proposed development complies with NPPF paragraph 203.
- 32.31 As set out above, Places for Everyone is to be given substantial weight in the determination of this application. Having reviewed the submitted evidence base it is considered that subject to conditions the proposed development complies with Places for Everyone – Composite Version September 2023, Policy JP-P1 Sustainable Places is considered to be , states that '...all development, wherever appropriate should be consistent with: a) conserves and enhances the natural environment, landscape features, historic environment and local history and culture.'
- 32.32 PfE policy JP-P2 Heritage requires that 'we proactively manage and work with partners to positively conserve, sustain and enhance our historic environment and heritage assets and

their settings' and that 'development proposals affecting designated and non-designated heritage assets and/or their settings will be considered having regard to national planning policy.' In addition, 'Proposals should be informed, as necessary, by the findings and recommendations of the appropriate heritage assessment(s) in the development plan evidence base and/or any updated heritage assessment submitted as part of the planning application process. 'Subject to conditions the requirements of this policy will be met.

- 32.33 Historic England has been consulted and have raised no objections. 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.
- 32.34 The development would not adversely affect any designated heritage assets surrounding the site, with the exception of Werneth Low cenotaph on which the effects upon its setting would be negligible. While it would impact on non-designated heritage assets and historic landscape features, the impact can be mitigated through conditions. Subject to these conditions the development is considered to accord with the NPPF, PfE and local plan policies in this respect and the impact on the historic environment is considered a neutral factor in the overall planning balance.

33. SUSTAINABILITY AND ENERGY

Applicant's Case

- 33.1 The applicant notes that the Council declared a Climate Emergency on the 25th February 2020. In response to this they state that the development will be 'exemplar' in terms of its overall sustainable credentials. In support of this, the application is accompanied with an Energy Statement and Sustainability Statement. There is a commitment to achieving net zero carbon in terms of its operational energy use, as well as a commitment to conducting Life Cycle Assessments for each phase of development to promote the use of low carbon materials in the construction process. The applicant states that substantial weight should be given to the sustainable credentials as part of the assessment.
- 33.2 The Energy Statement assesses potential options for the site by following the energy hierarchy and setting out a potential range of technologies to reduce energy demand and achieve net zero in operation. Taking a 'fabric first approach', measures include the usage of efficient materials and enhanced insulation to minimise the space heating required. Alternative proposals to gas boilers are proposed in the form of air source heat pumps, solar PV, as well ground source heat pumps. In addition to this, each of the dwellings would be served by electric vehicle charging points. The statement sets out that there are no existing heat/energy networks in close proximity to the site and considers the technical potential of an on-site heat/energy network and concludes that due to the scale of the site, it is 'possible', however further feasibility work would need to be undertaken to establish the practicality and financial viability of such a solution.
- 33.3 The applicant anticipates that the full details regarding sustainable construction and energy demand reductions in relation to the residential and community buildings/ retail hubs will be supplied with any subsequent reserved matters application within energy statements and would be a matter that would ultimately be conditioned.

The Council's assessment

- 33.4 Paragraph 52 of the NPPF states that the planning system should support the transition to a low carbon future in a changing climate. 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.

- 33.5 UDP policy U5 (Energy Efficiency) seeks to encourage development to incorporate energy efficiency within their design, the policy does not define a target which should be achieved. At a national level, the NPPF does not prescribe compliance with any specific standards, instead advising local planning authorities to ensure new development complies with relevant local requirements, where adopted, and more generally to approve developments that can demonstrate sustainable principles.
- 33.6 Places for Everyone carbon and energy policies (Policies JP-S2 and JP-S3) require developers to demonstrate that consideration has been made to the incorporation of measures that reduce energy demand in new residential developments, by following the energy hierarchy. This requires a 'fabric first' approach to minimise energy demand and ensure that homes do not have to be retrofitted at a later date, considering the opportunities for on-site renewable energy generation and the use of solar photovoltaics (targets are set out in table 5.1 of PfE) and consideration of any other energy sources – such as heat/energy networks. For renewable energy, priority should be given to PV installation. In relation to non-residential development, development should achieve at least BREEAM excellent standard. The above is subject to viability and should be demonstrated in an energy statement.
- 33.7 Policy JP-S3, within Heat and Energy Opportunity Areas, all major development should evaluate the viability of connecting to any existing local heat/energy network. The PfE allocated sites (which include Godley Green site) provide the opportunity for the creation of new site-wide or communal heat /energy network due to the scale of the sites and this opportunity should be explored further.
- 33.8 The applicant's aspirations to achieving net zero carbon are commendable and would align to the principles within NPPF paragraph 152 and those set out in PfE policy JP-S2 criterion 2. Although the Energy Statement states that Life Cycle Assessments will be carried out in future phases– no real calculation of the predicted energy demand across the site (as a baseline) has been undertaken or prediction of the energy savings likely to be made across the site, by applying such measures to demonstrate the likely demand reduction. Although the commitment made in the Energy Statement to achieving 35% improvement over Part L of the Building Regulations 2013 (as updated) through a mix of technologies is welcomed and would indeed be exemplary, as would the accreditation of BREEAM Communities, the feasibility of delivering this on the site has not been tested. The statement simply explores/compares a range of options which could potentially be applied without committing to a site-wide approach.
- 33.9 The statement also highlights that the provision of a heat/energy network could be explored to serve the energy needs of the development, however the proposal does not allow for it within the site design or layout and simply suggests further feasibility work should be carried out. Commitment to carry out further feasibility work would need to be secured by condition to align the development with PfE Policy JP-S3 (Heat and Energy Networks).
- 33.10 The submitted Energy Statement states that Electricity North West has confirmed that there is sufficient capacity to support a development of this scale on the local grid, however the applicant is committed to generating energy within the site. It has also been confirmed by the applicant that they are committed to progressing a Life Cycle Assessment for each subsequent phase of the development, the purpose being to focus upon the reduction of waste, reduce inefficiencies in the interests of carbon saving. This approach is welcomed and supports PfE Policy JP-S2 criteria 2, however a condition requiring at least an energy statement be submitted for each subsequent planning stage showing how development has met the targets for energy demand reductions and onsite renewables (table 5.1), as set out in PfE carbon and energy policies, would ensure compliance.
- 33.11 The Sustainability Statement aligns with the principles set within the Sustainable Design and Construction SPD. It addresses good access, crime mitigation, local heritage conservation, minimising waste generation, community participation, economic opportunities, minimising

energy and waste consumption, and efficient use of the land. The Sustainability Statement utilises the BREEAM Communities criteria to evaluate the proposed development and the process since inception. The applicant has found that the BREEAM Communities pre-assessment shows that the development can achieve a rating of at least Excellent, with the potential to achieve outstanding.

- 33.12 One of the key objectives of PfE is to promote the carbon neutrality of new development by 2028. Subsequent phases of the development will be expected to demonstrate in detail how this will be achieved in line with PfE policies JP-S2 and JP-S3. Detailed energy statements will be required at each stage of the development to illustrate how both regulated and unregulated carbon emissions are to be reduced, subject to the viability and practicality of measures, by following the energy hierarchy. Whilst the applicant's commitment is supported, it is considered that limited benefit is attributed in the planning balance.

34. WASTE

- 34.1 The NPPF has no specific policies relevant to waste although it does identify that minimising waste and pollution is a fundamental part of the environmental role of the planning system. The Greater Manchester Joint Waste Development Plan Document contains policies relating to the strategic management of waste and how future waste management requirements will be met. UDP policy MW12 control of pollution states that development will not be granted if the operations will be a generator waste and pose a threat to the amenity of the surrounding area.
- 34.2 The EIA which accompanies the application considers the potential effects of waste generated as a consequence of the development on the above matters. It identifies that the majority of the waste generated from the proposed development will comprise non-hazardous municipal solid waste associated with demolition, groundworks, construction and operational phases of the development. Applicable local waste management infrastructure has been identified confirming the availability of suitable waste outlets for the identified waste streams along with regional landfill sites and capacity volumes as this represents the most sensitive receptor to the generation of waste arisings. Subject to the use of Site Waste Management Plans and Operational Waste Strategies, the overall effect of the development is not identified to be significant and this carries neutral weight in the planning balance.

35. MINERAL SAFEGUARDING

- 35.1 There are areas within the site allocated in the Greater Manchester Minerals and Waste Joint Plan as Mineral Safeguarding Areas. This broadly comprises land to west of Green Lane being safeguarded for brick clay, areas to the east of Green Lane along with land to the south of Mottram Road being safeguarded for Sand and Gravel and a small fraction of the south eastern corner being safeguarded for sandstone.
- 35.2 Paragraph 212 of the NPPF states that Local Planning Authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working. Similarly UDP policy MW1 (Protection of Mineral Resources) seeks to protect areas of known mineral resources. It advises that; 'where another form of development is otherwise acceptable, consideration will be given to the economic viability and environmental consequences of the prior extraction of minerals before this proceeds, or to alternative locations for the proposal'
- 35.3 Policy 8 (Chapter 4) of the adopted GM Minerals Development Plan is the key policy relating to mineral safeguarding areas and provides criteria against which to assess the appropriateness of development within a mineral safeguarding area and to protect mineral resources from sterilisation by other forms of development. The policy states that:

- 35.4 Proposals for non-mineral development within the Mineral Safeguarding Areas that do not allow for the prior extraction of minerals will only be permitted where:
1. The need for the development outweighs the need to extract the mineral; or
 2. It can be clearly demonstrated that it is not environmentally acceptable or economically viable to extract the mineral prior to non-mineral development taking place;
 3. It can be clearly demonstrated that the mineral is either not present or of no economic value or too deep to extract in relation to the proposed development; or,
 4. The development is limited or temporary and would not prevent minerals extraction taking place in the future.
- 35.5 The applicant states in their supporting case that Policy 8 of the Plan does not preclude all development. The case presented is one that overriding housing need is greater than that of any consideration to the extraction of the mineral itself. A minerals assessment against Policy 8 has been undertaken, the findings of which are summarised as follows:
- The site's interrelationship with highly sensitive receptors including adjacent/nearby residential housing, school and ancient woodland, would preclude mineral extraction given that the environmental and physical impact would be unacceptable;
 - Access to the site for the extraction of minerals would be through a limited access area in between residential properties which would present large scale dust, traffic and noise impacts;
 - The large area of historical landfill in the eastern sector suggests that the extraction of sand, gravel and sandstone (south eastern corner) will not be economically viable as the excavated made ground will require removal and may also pose an environmental and human health risk; and
 - The intrusive site investigations revealed the clay deposits encountered are deemed to be poor quality and not suitable for brick manufacture due to the sand content and presence of gravel and cobbles.
- 35.6 The Minerals Assessment Review concludes that proposed development accords with the following criteria of Policy 8 in that it can be clearly demonstrated that it is not environmentally acceptable or economically viable to extract the mineral prior to the development of Godley Green taking place. The overriding need for housing delivery is given greater weight than the extraction of the mineral itself.
- 35.7 The applicant's assessment is considered to be a reasonable judgement. Whilst areas of the site are allocated as a Mineral Safeguarding Area (MSA) the allocations are not exclusive to Godley Green, with many other sites also allocated for such purposes within the immediate area, and across Tameside Borough. There have been no enquiries to the LPA relevant to extraction of the resource and it considered material to weight this against other mineral reserves.
- 35.8 Extraction of any mineral reserves at the site would clearly result in environmental impacts. The need for mineral has to be balanced against other planning objectives, the main consideration in this case being housing supply. The environmental impact of any extraction would in itself be significant, the MSA includes an area of SBI, partial amounts of Ancient Woodland, watercourses and ponds, PRoW and former landfill areas, in addition to this there are also existing dwellings immediately on the boundary. The extraction of mineral reserves would need to be undertaken over a number of years, environmental considerations would need to be considered in this context, associated impacts would include but not be limited to:
- Loss/damage to protected habitats including Ancient Woodland & SBI's
 - Impact upon Hydrology including the loss of ponds and influence upon watercourses
 - Landscape and visual impact associated with operation phases and long term changes to site topography;

- Noise, dust and vibration during work and;
- Transport.

- 35.9 In addition to the environmental constraints it is reasonable to make a judgement that extraction at this location would not be commercially viable. The applicant states that the mineral reserves are not of a particularly high quality and that there is a significant area of overburden within the site. Mapping identifies that historic landfill material is present above the sand and gravel reserves to a depth of up to 17m. The removal of this overburden, along with existing soils to non-landfill areas would be significant. Prior to any extraction it is likely that the landfilled materials would need to be removed first under a permit from the Environment Agency and possibly reprocessed to convert it to a non-waste. Alternatively, the tipped materials could be removed to a different landfill site, involving a large amount of removal of waste, which would have an excessive cost and environmental impact.
- 35.10 Weight is given to the lack of any commercial interest to exploit the mineral reserves. Factoring in the site's constraints, any benefits associated with extraction/processing of reserves would not counter that associated with benefits attributed to housing supply. Accordingly, it is supported that the proposals would meet the requirements of criteria 1 of Policy 8 and no objections are raised, the matter is considered a neutral factor in the overall planning assessment.

36. OTHER MATTERS

- 36.1 Crime Impact – It is noted that that a crime impact assessment has not been undertaken, on the basis of the overall size of the site and outline nature of the current application. Consultation with the Greater Manchester Police design officer confirms that it would be appropriate for a full crime impact assessment to be submitted with each subsequent reserved matters application. Security identified within the assessment would help to inform the design and layout of the development.
- 36.2 High Pressure Gas Main – Cadent have confirmed the presence of their apparatus within the site, specifically a gas main aligned across an east / west axis and also along a north / south axis via Green Lane and land off Brookfold Lane. The land use parameters plan acknowledges that an easement would be observed to satisfy access and maintenance requirements.
- 36.3 House Values – the impact of the development upon individuals house prices is not a material consideration in the assessment of the planning application

37. CUMULATIVE EFFECTS

Applicant's case

- 37.1 The ES sets out the cumulative effects of the proposals in combination with other local development projects. The applicant has reviewed planning permissions granted in the local area to identify any sites with the potential to generate cumulative effects in conjunction with the proposed development. A total of five developments were initially included in the assessment, with two further sites in the ES addendum. The developments are as follows:
- A57 Link Roads (previously known as Trans-Pennine Upgrade Programme). 17/00963/FUL.. Demolition of snooker club and erection of 24no apartments at Frames Snooker Club, Hyde
 - 16/00897/OUT. Residential development comprising up to 127 dwellings at Carrfield Mills, Hyde

- 16/00964/OUT. Residential development up to 21 residential units land off Fields Farm Road, Hattersley
- 16/00054/OUT. Redevelopment of the site, for approximately 96 new dwellings Clarendon College Sixth Form Centre Clarendon Road Hyde
- 22/00530/FUL Erection of 29no. dwellings and associated works -Land at Newton Business Park, Cartwright Street, Hyde
- 22/00678/FUL New school for pupils with special educational needs or disabilities (SEND); Longendale Playing Fields Off Manley Grove, Mottram in Longdendale

37.2 The applicant concludes that there are few significant potential impacts beyond those identified within the technical assessments, mainly due to the distance between the sites and the small scale of the majority of the other developments.

37.3 The ES also looks at synergistic effects, that is the in combination effects on the sensitive receptors. They say that as with any development, there is the potential for impacts to interact both within and outside the site.

37.4 The applicant states that adjacent residential properties have the potential to be affected during construction. In particular, properties on Green Lane will be close to the construction works, and could be exposed to visual effects, noise and dust. This could be mitigated through the retention and enhancement of trees and green spaces around the edge of the property, but some residual effect is likely to remain.

37.5 Properties on Mottram Old Road are also likely to be impacted during the construction phase by dust (depending on the prevailing winds), as well as short term impacts from noise, vehicular movements and visual impact. The applicant states that a construction environment management plan focusing on measures to reduce impacts on the properties will mitigate the impacts, including appointing community liaison officer so that neighbours can report any concerns.

37.6 Whilst measures can be put in place, the applicant recognises that construction activity inevitably generates disturbance, but that it would not be at a level that would make it unacceptable in planning terms.

37.7 The applicant states that the potential interaction of dust, noise, transport and visual impacts are limited in significance due to the small number of sensitive receptors and the use of best practice construction measures. The temporary synergistic effect at the construction phase would be minor adverse.

The Council's assessment

37.8 The applicant has carried out a comprehensive review of other developments in the area. The outcome is accepted, where the scale of the proposals in comparison with extant permissions means that any impact would be minimal.

37.9 It is also accepted that the in-combination effects of the development would be prevalent during the construction phase. The applicant has identified the relevant sensitive receptors and the effects that would prevail as a result. A construction environment management plan is appropriate and can be secured by condition. Notwithstanding this, a degree of disturbance would prevail such that there would be a limited adverse impact as a result.

38. CONCLUSION ON OTHER CONSIDERATIONS

38.1 There are a number of identified benefits associated with the development, aligned to social, economic and environmental factors, the cumulative value of which can be attributed substantial weight in the overall planning balance.

- 38.2 The strategic nature of the site presents an opportunity for the development to contribute significantly to the Borough's long-term housing land requirement, this also includes the ability to secure a significant and sustained contribution to the delivery of affordable housing. The opportunity to deliver a mixed tenure development that addresses a broad range of housing needs within an accessible environment attracts significant positive weight in the planning balance.
- 38.3 The socioeconomic and health benefits which can be attributed to the development could be transformative in the local context, by tackling long-term identified inequalities through targeted employment initiatives and the promotion of healthy, active lifestyles. The employment and health opportunities would represent a positive step change in the Council's ability to meet its growth, regeneration and health aspirations which are identified as key objectives of the Council's Corporate Plan and Inclusive Growth Strategy. The residential environment that would be created would be based around health and activity, and would provide conditions to allow people to thrive. These factors carry substantial weight in the planning balance.
- 38.4 Tied to the promotion of healthy and successful lifestyles are factors relevant to design and placemaking. As identified the development aspires to Garden Village principles, this vision would be largely delivered through the provision of a number of relevant factors.
- 38.5 The provision of education is to be welcomed and is attributed moderate beneficial weight in the balance, as it will create additional capacity that would benefit the wider community as well as residents of the site.
- 38.6 The retention and management of site features, such as ancient woodlands and sites of biological interest, along with the provision of additional open space would also attract moderate beneficial weight. An increase in accessibility would deliver a range of benefits, as would the resulting biodiversity net gain. There is a need to remove some trees, but the protection and management of the ancient woodlands in particular, still means that limited beneficial weight can be ascribed.
- 38.7 National planning policy requires a very high standard of design to be met for new development. The submission sets out a detailed design code which is welcomed, and meets this policy requirement, but as a result can only be afforded limited weight. The provision of local centres within the development as a focal point of the design of each village is welcomed and would provide facilities necessary for a new community to sustain itself in line with Garden Village principles. Again, this is afforded limited, but positive weight.
- 38.8 Measures in respect of sustainability, net gain and energy are welcomed, but lack certainty. Conditions can be attached to ensure that measures are embedded in the scheme, but only limited benefit can be attributed in the circumstances.
- 38.9 The assessment of other considerations has also determined that there are many neutral impacts associated with aspects of the development. This applies to matters such as the loss of agricultural land, drainage, ground conditions, the historic environment, energy, waste and mineral safeguarding. Consideration of these matters has identified that sufficient safeguards can be achieved through conditions to mitigate any potential impacts.
- 38.10 Collectively analysis of other considerations demonstrates that Godley Green can be developed in a manner which could be highly sustainable. The benefits can also be attributed to locational factors and the strategic opportunities that the site presents.

39. PLACES FOR EVERYONE & PREMATURITY

- 39.1 Planning Practice Guidance sets out the circumstances when it might be justifiable to refuse planning permission on the grounds of prematurity. Paragraphs 48 to 50 of the NPPF explain how weight may be given to policies in emerging plans. However, in the context of the Framework and in particular the presumption in favour of sustainable development, claims that an application is premature, as set out within paragraph 49, are unlikely to justify a refusal of planning permission other than where both of the two-policy tests are satisfied. Namely:
- 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 Local Plan; and
 - b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.
- 39.2 As set out within paragraph 50 of the NPPF, refusal of planning permission on grounds of prematurity will seldom be justified where a draft plan has yet to be submitted for examination. Where planning permission is refused on grounds of prematurity, the local planning authority will need to indicate clearly how the grant of permission for the development concerned would prejudice the outcome of the plan-making process.
- 39.3 Places for Everyone is the emerging plan of relevance, and as set out within section 4 of this report, it is at an advanced stage, within the latter phases of its examination. Therefore, the first condition of paragraph 49 of the NPPF is of importance. The issue of prematurity requires to be considered on a site by site basis, specifically in respect of where granting planning permission now for a development, in advance of the plan being adopted, which results in undermining the plan making process. This requires consideration of whether a decision to grant planning permission for the development at Godley Green would be central to the emerging plan.
- 39.4 The inspectors examining PfE have given very clear direction regarding the continued inclusion of JPA31 Godley Green Garden Village within the plan, subject to proposed modifications. It is not therefore considered that granting planning permission for this site now would result in the plan being undermined. The merits of the application, in respect of the plan's policy, JPA31 Godley Green Garden Village, are discussed throughout this report, demonstrating broad conformity such that the Plan is not undermined whereby the issue of prematurity falls away.
- 39.5 As part of the Planning Statement the applicant has provided an assessment of whether the proposal accords with each of the site-specific policy criterion set out in JPA31, which are discussed below. The conclusion being that when assessed as a whole, the proposed development is in broad conformity with PfE policy JPA31.
- 39.6 The applicant highlights that the proposal will deliver a quantum of housing that is broadly in line with the policy and that affordable housing will be delivered in line with the council's requirement. The development will deliver against Garden City principles, for example this is demonstrated through the approach taken to design, the delivery of significant infrastructure, and applying planning conditions to secure the long-term stewardship of assets.
- 39.7 Masterplanning, phasing and design codes are dealt with in a number of submitted documents, including the Design and Access Statement and will be secured by a number of conditions. Similarly, the need to ensure that potential archaeology is considered through the development process will be secured through conditions requiring that further archaeological investigation and recording is carried out.
- 39.8 With regards to ensuring the character of, and interface between, new and existing development are sensitively designed and acknowledged by development proposals, then this is explored in more detail in the Design and Access Statement. The series of parameter

plans contained with the Design and Access statement, set out a clear vision for this approach and would therefore accord with this policy requirement.

- 39.9 The submitted supporting material makes it clear that the proposal will deliver two distinct villages. The Design and Access Statement articulates a series of neighbourhood design codes for the sub-areas of the site. Despite there being no direct vehicular connectivity between the villages, there will be a connectivity for walking, wheeling and cycling due to the number of routes between the two parts of the site. As both centres are also proposed for a broad mix of uses the approach proposed would accord with this policy requirement.
- 39.10 The parameters plan relating to height and density identifies high density opportunities adjacent to Hattersley station at up to 100 dwelling per hectare. In response to constraints this reduces as the distance from the railway station increases. Therefore, the proposal accords with this policy requirement.
- 39.11 The development will make both financial contribution and deliver infrastructure that will improve access to education facilities. Therefore, the proposal accords with this policy requirement.
- 39.12 It is proposed that the development will make new provision for vehicular access from the A560 Mottram Old Road. In addition, a wide range of interventions are proposed delivering new sustainable transport links, upgrading existing PRow infrastructure, the link bridge to Hattersley and Station, improvements to Hattersley Viaduct, improved bus service (including diversion into the site), improvements and diversion of the existing Trans Pennine Trail through the garden village and improved walking and cycling facilities along the A560. Based on the above range of mitigation proposals the proposal accords with a number of policy requirements.
- 39.13 The application is committed to the delivery of a multi-user bridge across the eastern boundary. The delivery of this would be agreed within the section 106 agreement, it would also be tied to a phasing condition relevant to site infrastructure. This would ensure early delivery within the development of the site. The inclusion of the bridge within the application accords with this policy requirement.
- 39.14 Whilst it is acknowledged that the proposal would have an inevitable impact on habitats, the application demonstrates that these can be mitigated and that 10% BNG can be achieved. Furthermore, with regards to the potential impact on the South Pennine Moors SAC/SPA, the proposal seeks to significantly increase the area of accessible green infrastructure. It is considered that significantly increasing the level of local accessible green space will mitigate the potential recreational impacts on the South Pennine Moors SAC/SPA.
- 39.15 There has been changes to the policy wording relating to the Green Belt boundary along the A560 since the planning statement was submitted. The current proposed modified text is "Strengthen the boundary of the Green Belt along the A560 such that it will comprise physical features that are readily recognisable and likely to be permanent;" Therefore, although the applicant has demonstrated through the supporting parameter plans that amenity green space will form the frontage to much of Mottram Old Road, and that detailed design will be considered at reserved matters stage, it is not possible to conclude to what degree this element of the proposal accords with the modified policy requirement.
- 39.16 Compensatory improvements to the Green Belt are principally demonstrated through biodiversity improvements to the area identified to the south of Mottram Old Road and through improvements to connectivity via the Trans-Pennine Trail and PRow. Therefore, the proposal accords with this policy requirement.
- 39.17 The Minerals Assessment Review submitted as part of the application demonstrates that prior extraction of minerals would not be possible on two counts. Firstly, the mineral deposits

are not economically viable for extraction and secondly, that it would not be environmentally acceptable. Therefore, the proposal accords with this policy requirement.

40. PLANNING OBLIGATION/FINANCIAL CONTRIBUTIONS

40.1 In order to comply with the Community Infrastructure Levy (CIL) Regulations 2010 and Paragraph 57 of the NPPF, any developer contributions sought must satisfy the following tests:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development.

40.2 In order to make the development acceptable in planning policy terms, off-site contributions and mitigation would usually be secured via a legal agreement under section 106 of the Town and Country Planning Act 1990 (as amended). In this case, the situation is complicated by the fact that the site falls across multiple landownerships, including the Council. However, as the applicant is the council, an agreement or undertaking cannot be entered into should planning permission be granted in this case.

40.3 The recommendation here is that appropriate financial contributions are sought by attaching a condition that development of the site can only take place until a s106 agreement is entered into by the parties. This would preclude development of the site until all landowners/development are bound to the financial contributions ahead of any development or within an agreed time period.

40.4 As detailed within the Transport and Access section earlier, the applicant will be required to deliver and/or make contributions to the provision of highway infrastructure upgrades within the local area, in accordance with Policy T13 of the adopted UDP. These infrastructure upgrades have been identified as follows:

- A new bridge to link the Godley Green Eastern Village with Hattersley;
- Improvements to cycling and walking facilities and relevant infrastructure along the A560 corridor including Hattersley viaduct;
- Provision of Pegasus crossing on the A560; Bus stop improvements along the A560 corridor; improvements to the existing no. 346 bus service, at peak times to serve Market Street, Stockport Road and Mottram Old Road, alongside the Eastern and Western village; and Hattersley Railway station, for a minimum period of 5 years;
- Traffic calming features on Lilly Street and Werneth Avenue;
- Improvements to the existing signalised junction at Stockport Road/Ashworth Lane;
- Traffic signal improvements / revalidation to junctions of Hyde Road/Pottery Lane, Market Street/Dowson Road, Market Street/Union Street, Hyde Road/Georges Lane and Hyde Road/Lower Bents Lane, M67/Clarke Way;
- CCTV upgrades to junction of Union Street/Market Street, Hyde;
- Variable Message Signs (VMS), at Stockport Road, Hattersley, and Stockport Road, Hyde;
- Bluetooth Journey Time Sensors (JTS) and Automatic Traffic (ATC) / Cycle Counters (ACC) at the A57 Mottram Road, A560 Mottram Old Road, and on the Trans Pennine Trail.

40.5 The highway infrastructure improvements would meet the CIL regulations in that they are necessary to make the development acceptable in planning terms, given the need to encourage site users to use sustainable transport means where possible, and to mitigate against the increased network capacity and highway safety issues which would arise as a result of the additional traffic associated with the development. The improvements are directly related to the development, as the highway impacts would be a result of the proposed works, and they are proportionate in that the sums are based on the size of the development.

- 40.6 In terms of affordable housing, the applicant has confirmed that a minimum of 15% of all dwellings to be provided would be on an affordable basis with a split of 60% affordable rent and 40% affordable home ownership. The accommodation type, tenure and location would be reviewed under each subsequent phase of development to ensure that cumulatively the development delivers its minimum 15% onsite affordable housing requirement.
- 40.7 The development requires a financial contribution to be made to the provision of school places, in accordance with paragraph 95 of the NPPF and Policy H6 of the UDP. The applicant has agreed to pay contributions towards primary, secondary and special school places, these contributions would be phased with Secondary and Special School funding paid upon commencement of development and a contribution towards primary upon completion of the 1800th dwelling.. The payments would be indexed link but are currently as listed within the education consultation response as listed within section 7 of the report. These contributions would meet the CIL regulations in that they are necessary to make the development acceptable in planning terms, given the increased pressure upon school places as a result of the additional housing proposed within the site, and for the same reason are directly related to the development. The contributions are proportionate in that the sums are based on the size of the development and the demand for school places within the locality.
- 40.8 A range of public open space is to be provided on-site, with a scheme for management and maintenance of such areas to be submitted for approval. The submission of a phasing strategy will help to determine the overall delivery and management of the public open space. Where public open space is directly linked to a phase of residential development the applicant proposes that this is provided prior to the occupation of 75% of the dwellings in that phase, this would be maintained in perpetuity in accordance with a management scheme. Any contributions towards formal off-site recreation or sports facilities would be reviewed under subsequent Reserved Matters applications, a condition would require that these are accompanied by a Sports Strategy statement.
- 40.9 The contributions would meet the CIL regulations in that they are necessary to make the development acceptable in planning terms, as they would address deficiencies in open space provision, and would provide genuine health and well-being benefits for the local community. The contributions would be directly related to the development because they would be based either on-site, or within the locality so would be accessible to future residents and users of the site. The contributions are proportionate in that the sums are based on the size of the development and following an assessment of existing open space provision within the locality.

41. PLANNING BALANCE AND CONCLUSION

- 41.1 Section 38 of the Planning and Compulsory Purchase Act 2004 states that applications should be determined in accordance with the development plan unless material considerations indicate otherwise. Paragraphs 2 and 219 of the National Planning Policy Framework (NPPF) state that the policies contained therein are material considerations which should be taken into account in dealing with applications. Paragraph 11 of the NPPF states that decision should apply a presumption in favour of sustainable development by approving development proposals that accord with an up-to-date development plan without delay.
- 41.2 The majority of the site is allocated as Green Belt, where saved policy OL1 of the UDP is the starting point. This policy is broadly consistent with NPPF paragraph 149 in setting out exceptions to inappropriate development and in what circumstances development in the Green Belt may be acceptable. There are some limited inconsistencies with the exact tests of the Framework, however the policy remains broadly consistent in matters material to the application and should be given full weight. Policy OL1 states that the Green Belt will continue

to be protected from inappropriate development and approval will not be given except in very special circumstances, for the construction of new buildings, subject to a number of exceptions.

- 41.3 NPPF paragraph 147 states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 148 states that 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.
- 41.4 The proposal would be inappropriate development within the Green Belt, and therefore is harmful by definition. Further, the proposal would conflict with two of the five purposes that Green Belts serve through representing urban sprawl and encroachment into the countryside. Additionally, the proposal, despite the mitigations proposed, would negatively impact both spatially and visually upon openness. In conclusion, the conflict with purposes, taken together with the impact upon openness and definitional harm by reason of inappropriateness, culminate that very substantial weight should be attached to the harm to the Green Belt as a result of the proposal.
- 41.5 Further, the while the development would not have an unacceptable impact on highway safety nor the highway network, residual minor adverse impacts on the highway network would remain and this harm should attract limited weight in the planning balance. Additionally whilst careful consideration has been given to the landscape impacts, the landscape has a high degree of sensitivity and there will remain longstanding harm as a result of the proposal, harm which should attract moderate weight in the planning balance.
- 41.6 The application site is not within an air quality management area, although there are areas locally which are. Air quality would be managed to policy compliant levels. However, an adverse impact will remain, and this harm should attract limited weight in the planning balance. The noise impacts of the development have been adequately assessed and mitigated, however, given the overall transformational change of the developed site, compared to existing uses, there would remain an increase in noise arising. This harm should attract limited weight in the planning balance.
- 41.7 The introduction of lighting will have an impact on residential properties as well as sky-glow and some light spill. Other matters such as highway, railway and ecological impacts can be mitigated. However, it remains, there would be an increase in urbanised lighting in comparison to the current agricultural environment. This harm should attract moderate weight in the overall planning balance.
- 41.8 The cumulative impact of the development, specifically during the construction phase would impact on residents in the vicinity of the site, such as on Green Lane and Mottram Old Road. Whilst mitigation measures could be put in place, disruption during the construction phase is the inevitable result of any building project.
- 41.9 In summary, alongside the very substantial weight that should be attached to the harm to the Green Belt resulting from the development, matters of harm associated with residual lighting and landscaping impacts should individually attract moderate weight and residual highway, air quality and noise impacts individually attract limited weight. These impacts should collectively weigh against the proposal.
- 41.10 In favour of the proposed development, it would deliver significant socio economic and health benefits to an area identified as one of the most deprived nationally, improving life chances, social cohesion and wider investment and these two matters individually attract substantial positive weight. Further, the proposal would deliver a substantial number of new homes and

in particular affordable homes both of which each attract significant weight given the poor housing land supply position and historic under delivery of affordable dwellings. The development would also go beyond mitigating its impact in supporting expansion of Alder Community High School, deliver open space which ameliorates existing deficiencies within the broader area and provide a net gain for biodiversity, each of which should individually attract moderate weight. There would be limited benefits arising from the local centres, through the achievement of good design, tree planting and the sustainability credentials of the new homes. Matters concerning agricultural land quality, drainage and flood risk, ground conditions, the historic environment, waste, and mineral safeguarding all carry neutral weight.

- 41.11 For the above reasons, it is considered that the potential harm to the Green Belt by reason of inappropriateness, together with any other harm resulting from the proposal, is clearly outweighed by the other considerations and consequentially very special circumstances exist to support the grant of planning permission, subject to appropriate conditions. For the reasons given above there are also no material conflicts with relevant development plan policies and the proposal is in accordance with the development plan overall and is a sustainable development.

RECOMMENDATION

That Members grant planning permission subject to:

Referral of the application to the Secretary of State under the provisions of the Town and Country Planning (Consultation) (England) Direction 2009 and there is a decision not to call the application in for determination; and

The conditions set out in appendix one.