



CPRE Lancashire, Liverpool City Region and Greater Manchester strongly objects to the proposed development at Godley Green on the following grounds.

The whole site (111 hectares), excluding the area to the north of the railway line, is situated within the Green Belt and the development is inappropriate. In our view the harm to Green Belt purpose of keeping land permanently open is harmed to a large and significant extent. Purposes a) checking sprawl b) merging of Hyde and Hattersley, c) safeguarding against countryside encroachment and e) encouraging the reuse of brownfield are harmed (as set out in NPPF para 138). This is against national and local plan policies supporting the protection of openness and permanence.

CPRE disagrees that there is a case for Very Special Circumstances and is of the opinion that VSC is not justified.

CPRE disputes the housing and jobs figures suggested due to the use of out-of-date ONS 2014 figures when 2016, 2018 and 2020 data exists. We have called on Government to use up to date population data for calculating the housing requirement. In this regard the Government is ignoring its own best practice.

In terms of economy a massive rethink to unabated growth in the context of the climate emergency, biodiversity collapse and Covid on commercial property vacancy needs revisiting.

Considering the economic uncertainty it is clear that the economic benefits are overstated.

A key issue for strategic planning in Tameside and wider Greater Manchester is linked to the industrial past and the need to revitalise considerable brownfield land that blights communities. We think the Brownfield Register needs to be revisited to understand how many sites are available to deliver housing and jobs. We think there is enough alternative land to avoid having to build in the Green Belt.

We do advocate the need for a masterplanned approach when there is a bone fide need for a sustainable urban extension, however the need is unjustified and there are considerable negative impacts including but not limited to:

Mix of housing - we think more than 15% of the housing could be affordable and we dispute 'First Homes' being 'genuinely affordable'. We also consider 8% of properties being 2-bed as too few as increasingly the population is aging and there is a need for downsizing for older households.

Ecology - there is a biodiversity crisis, and this land supports a range of flora and fauna linked to equestrian land uses and should be conserved and enhanced in the future. Much of the site is not publicly accessible and this means natural habitats are largely undisturbed and support a range of biodiversity. Not enough green infrastructure is proposed in the proposed development this includes available open space and woodland, trees, hedgerows, and other elements.

Landscape character - there is value in the current landscape and visual amenity provided by the land and surrounding area. More people use local greenspace for recreation and leisure using the extensive network of public rights of ways, including bridleways for horse riding and cycling. The area We want planning decisions to enhance local distinctiveness and protect the predominately rural and open nature of the site.

Traffic - the development will induce a large amount of activity into an area that has not capacity to cope, and it already has significant congestion on the strategic highway network.

Other harms - There will be harm to heritage, flooding, tranquillity due to more noise, lighting, and other disturbance.

The masterplan is too car dominated and should have provided more opportunities for sustainable travel modes.

We acknowledge the areas are in need of investment but consider reuse of previously developed land would tackle blight and be a better solution to place making and lead to improved quality of life for residents and workers.

The site is contested. Government, Greater Manchester Combined Authority, Tameside Council, and people of Greater Manchester have indicated a brownfield preference. Approval of this application would be premature, and it would frustrate the strategic plan-led approach to land use decisions. The Greater Manchester 'Places for Everyone' spatial plan is due to be submitted for examination in January/February 2022 pursuing a much more strategic approach to planning and it is the correct vehicle to consider the release of Green Belt.

When undertaking the planning balance, the harm to Green Belt purpose needs to be considered, plus other harms. When considering the benefits, only housing delivered in the first five years equal to 495 dwellings can be attributed significant weight. Also, the economic benefits are exaggerated.

Due to the significant large-scale harm to Green Belt and other severe negative impacts I find the planning balance to be negative.

I therefore recommend that the application is refused.

Yours sincerely

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Planning Manager