

3: HOUSING AND COMMUNITY FACILITIES

POLICY H 1

Housing Land Provision

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Mr D Astall, Mr P Stoddard & Dr Johnson	59	76	O	
Government Office for the North West	327	279	O	
Greater Manchester Passenger Transport Executive	339	360	O	
Mr R C Harrison	365	27	O	
House Builders Federation	408	413	O	
Redrow Homes (North West) Ltd	643	472	O	
Redrow Homes (North West) Ltd	643	522	O	
Roland Bardsley Homes	658	33	O	
W I S H Properties	825	443	O	
Derbyshire County Council	239	159	S	
OBJ NO	SUMMARY OF OBJECTION			
76	Housing land supply is inadequate and uncertain and will result in failure to meet the requirements.			
279	The Council needs to develop its own target for brownfield land. There needs to be clearer priority for previously developed sites, more detail on the phased release of land and information on how the annual review will work.			
360	Public transport accessibility of individual sites should be included in the text of the policy.			
27	Development of land to the rear of 26 Green Lane, Hollingworth would contribute towards housing land supply.			
413	There is no attempt to quantify clearance, there is uncertainty on site delivery and insufficient justification for the number of windfalls.			
472	The policy should include provision for clearance, slippage, and assessment of which sites will come forward.			
522	Insufficient provision is made to meet the housing target. Further allocations are required, especially for houses at the upper end of the housing market			
33	There should be justification for the release of greenfield land. There is no allowance for clearance in housing requirement figures. Doubts about the availability of some sites mean additional sites are needed.			
443	Disused land at Miller Hey, Mossley is suitable for housing development, rounding off the urban area			
159	Important that Tameside meets RPG housing provision in order to avoid increasing pressure on Glossop			

Background

- 3.1.1 Insofar as the objections criticise figures in the deposit draft of the plan, these figures were amended in the revised deposit version and consequently whilst the generality of an objection is maintained I make no comment on the details.
- 3.1.2 Similarly I make no comment on the general availability of allocated sites in my conclusions on policy H1. Where doubts are cast about the availability of particular sites and/or their ability to be developed before the end of the plan period, these are dealt with under their specific policy numbers below. If no detailed criticisms are made of individual allocations I have assumed the Council's assertion is correct that the sites can be brought forward within the plan period, is correct, that is of course taking into account the 20% slippage allowance.
- 3.1.3 A long planning history to a site does not necessarily mean it is incapable of development nor does the non development of allocated land in a previous plan. In the past there has not been the same emphasis on recycling urban land and greenfield sites were seen by some as an easier/cheaper/preferable option for development.

Nevertheless in reaching my conclusions I am mindful that the constraints on some sites will mean that they may not be immediately available for development.

- 3.1.4 Other objections to policy H1 put forward alternative sites for housing development. My comments on the suitability of the site at Green Lane in Hollingworth are to be found under policy OL4, whilst those in relation to the site to the north of Old Mottram Road and west of Green Lane Hyde are to be found at the end of this chapter under the heading non policy specific objections. Finally those to land adjacent to Millers Hey Cottages off Regent Drive, Mossley are under policy OL2.

Main Issues

- 3.1.5 i) whether the housing land supply is adequate and takes proper account of the scale of house clearance.
ii) whether the policy makes it clear that previously developed land will always be given priority for development
iii) whether the policy should cater for the phased release of land and an explanation of how the annual review will work.
iv) whether reference to public transport accessibility should be included within specific housing site allocations.

Conclusions

- 3.1.6 **The first issue.** PPG3 advises local planning authorities to only identify sufficient land to meet the housing requirement set out in regional planning guidance. Regional planning guidance has been evolving at the same time as the UDP. In July 2000 the emerging RPG13 set a requirement for 6600 additional dwellings in Tameside between 1996 and 2011 and it is on this figure that policy H1 is based. However the Secretary of State's proposed changes published in May 2002 set an annual requirement (from that time) of 370 completions a year until 2006 or until the end of the plan period or until there is a review of the regional guidance. This is substantially lower than the 6600 proposed in 2000. I note here that the Council will take account of final RPG figures if they are available at the modification stage of the plan.
- 3.1.7 Policy H1 identifies a total of 7210 plots which assumes 145 windfall completions per annum (from 2001-2011) and 20% slippage on allocated sites and sites with planning permission where construction has not yet started. Updated figures to mid 2002 indicate that a residual supply of 4750 still remains. However if the annual rate of 370 units a year is taken to the end of the plan period and deducted from the completions since 1996 this would mean only an additional 3330 houses would be required which is somewhat below the updated residual supply which remains. The supply therefore appears to be well within the requirement. Before deducting 20% for slippage the current estimate is that the 17 allocated sites would yield 2300 dwellings. However the assumptions on site capacity are that development would be at 30 dwellings per ha. I note here that when detail proposals for sites come forward this may be an underestimate and may not properly reflect the Government's aspirations for maximising the use of land by developing at a minimum of 30 dwellings per ha.
- 3.1.8 Moreover the figures in the UDP do not include any provision for housing clearance. Between mid 1996 and mid 2002 about 1600 dwellings were cleared with about another 200 due to be cleared in the future. There are also likely to be more clearances in the Ashton Renewal Area and in Hattersley, although I am told it would be premature at the present time to estimate the numbers. Replacing demolished properties will inevitably take up part of the margin between the residual supply and the requirement, even though the Council accept that there is unlikely to be the necessity for replacement of

cleared dwellings on a one to one basis. This is primarily because many of the cleared dwellings suffered from under occupancy. I understand the Council is still in the process of evaluating the implications of clearance on future housing provision, but I would expect by the modification stage of the plan that this work will have been completed and a realistic estimate of the allowance to compensate for clearance to have been put into the equation.

- 3.1.9 Overall when looking at completions since 1996 there have been about 2700 which is well in excess of the 370 net requirement now put forward in the regional guidance, although it does relate well to the figure of 370 completions a year (1996-2000) suggested by the objectors. However I do not agree that this figure means that there are long term constraints on the supply of land. In the past 2 years the Council refer to 1200 completions in the borough. It is not unusual for completions to fluctuate and the figures for past completions suggested by the objectors are a good match for those currently proposed in the emerging RPG.
- 3.1.10 With regard to windfalls, the Council have revised the annual number down to 145 in the revised deposit plan and from the information I have seen I consider this figure and the 20% allowance for slippage to be reasonable assumptions to make. I note that interest has already been shown by developers in a number of allocated sites. Given these circumstances I do not support the view that the housing land supply in the plan is inadequate, rather in the light of Government policy which seeks to maximise the use of land, it must be considered if it is too generous. However in my detail consideration of individual sites I have recommended deletion of allocations and phasing of greenfield sites which will affect overall figures.
- 3.1.11 Where I am at odds with the Council is that they consider the need to provide variety and choice for developers could result in a lack of sites if there is not a 5 year supply of land. They follow on from this to say that further greenfield sites may be needed to maintain the supply. It seems to me that if, at the present, the Council are content that there is an adequate supply of land to meet the housing requirement satisfactorily, then they should attempt to phase the release of that land on a more rigorous basis rather than assume the simple phasing approach they have adopted may result in the release of greenfield sites. This would not meet the objectives of PPG3.
- 3.1.12 Further I am mindful that when it seeks to provide variety of site for developer and occupier alike, account should be taken of the Government's objective of creating mixed and inclusive communities. Implicit in this is the need to provide mixed development by size, type and tenure of house which looks further than perpetuating traditional forms of housing and densities in particular areas. I have seen no substantive evidence which indicates that the variety, size and location of site allocated would lead to a shortage of a particular type of site or property.
- 3.1.13 Given the current level of information available from the Council and the stage of preparation of regional planning guidance. I consider the supply of housing land in general to be acceptable to meet the housing requirement. I reach this view on the understanding that when the final version of the RPG is published it may involve some review of the housing figures. I note here also that there is a discrepancy between the requirement of 6600 dwellings set out in the policy itself and the supply of 7200 units in Table 1. It seems to me that the explanation to the policy should explain that difference.
- 3.1.14 **I now look at the second issue.** The July 2000 version of the emerging RPG put forward a target for 65% of all housing development in Tameside to be on previously developed land or buildings. This was amended to an average requirement of 80% in the Greater Manchester area in the March 2002 edition of the RPG (incorporating the

Secretary of State's proposed changes). In the meantime, after further consideration by the Council, the target of 65% in the draft deposit UDP was changed to 75% in the revised deposit. It is therefore slightly lower than that recommended in regional guidance, although I understand an objection to the 80% is currently being considered. It seems to me that at present the 75% target set by the Council is a reasonable one to seek to achieve. In reaching this conclusion I have taken account of my recommendations which mean that additional greenfield sites should be reserved for phase two development which in turn will mean that the proportion of brownfield sites coming forward in the early stages of the plan will be greater than the currently proposed average.

- 3.1.15 I am also mindful that once the final version of regional planning guidance is available it will be a matter for Greater Manchester's planning advisory group on housing matters to determine how the sub regional target can be met on an individual district basis. If it is retained and if Tameside needs to meet that figure there may be the need for a reappraisal of the allocated sites. At the present time I consider it would be premature to require Tameside to meet that 80% target without either the final version of the RPG or the figures for Greater Manchester as a whole being available. On the assumption that the final version of the RPG is published in the near future, the modification stage would be an appropriate time for the Council to review its recycled land target.
- 3.1.16 **The third issue.** The Council have made changes to the draft deposit plan. In the revised deposit plan policy H1 now says that that the Council will give priority to new dwellings on previously developed land/buildings, that development on greenfield sites will not commence before mid 2006 and only then if an adequate 5 year supply is not available through outstanding commitments and remaining allocated brownfield sites. Therefore whilst they have not produced a formal phasing strategy, the Council have sought to prioritise the release of land reserving its greenfield allocation until last. This is in accord with the objectives of PPG3. Monitoring the housing situation on an annual basis will inform the Council of both the need for the release of the greenfield land and a review of the plan. However it seems to me that the release of greenfield land should not only take into account outstanding commitments and remaining brownfield allocations, but also make an allowance for windfalls.
- 3.1.17 The Council have allocated only one 100% greenfield site. Of the remaining other 16, 5 are on entirely previously developed land and 11 are mixed sites. Although figures produced by the Council indicate that over the plan period - including completed, committed and windfall developments - about 74% development on previously used land/buildings can still be achieved with these allocations.
- 3.1.18 I note that a significant number of the allocations include a proportion of undeveloped land in order to make redevelopment viable and all but 2 include derelict land. Of the 2 which do not, one will assist the regeneration of a town centre and the other now has planning permission. Given the need to provide market choice for developers and occupiers together with the constraints inherent in developing some sites which may take some time to resolve, it seems to me that it would be unnecessarily confining for the bulk of the sites to be subjected to a more formal managed release of land.
- 3.1.19 In practical terms whilst PPG3 now only seeks to provide sufficient sites in the development plan to accommodate the first 5 years of housing development, I see no reason why it should not also be used as a bench mark for the release of greenfield sites. It seems to me that as the policy is now written H1 is very restrictive of the development of greenfield land.

- 3.1.20 Insofar as an objective of the phasing of the release of land seeks to control the pattern and speed of urban growth. It seems to me that in the case of Tameside the pattern of growth is largely set by the existing settlement pattern and there is no evidence to suggest that the pressure for housing development in Tameside is so strong that should all the brownfield sites be released at once there would be an upsurge in building rates. Moreover the nature of the sites put forward for development is such that I do not believe that a criteria based approach to land release would be productive. I do not therefore consider that within the constraints of the housing requirement set by regional planning guidance and the supply of land proposed in the UDP that phasing of land release is necessary in the Borough to control the pattern or speed of growth.
- 3.1.21 I note the Council consider that, in general, Government policy on the release, phasing and supply of land is not clear. That is not a matter on which it is appropriate for me to comment. It should be pursued by the Council directly with the Government outside the development plan forum.
- 3.1.22 **With respect to the fourth issue**, it is evident from information supplied by the Council that they have, as required by PPG3, taken into account the accessibility of sites and this is mentioned in several of the housing allocations. In the Council's response to the objection by GMPTE appendix 2 shows the location of the 17 allocated sites in relation to rail, quality bus corridors, the metrolink extension and other bus routes.
- 3.1.23 The availability of public transport is only one of the considerations when looking at the location of housing development. Other factors such as the proximity of services, schools and shops and their accessibility by walking, cycling and the like must also be taken into account. These other factors are not specifically mentioned in the individual housing allocations.
- 3.1.24 Moreover whilst it might be assumed that the metrolink once it is constructed and the quality bus corridors will provide good public transport links within and to/from the Borough, the same cannot be said for the frequency of trains or buses services on other routes. The frequency of both trains and buses are largely outside the influence of the Council. To state the present position with regard to routes and frequency of public transport modes would provide only a snapshot in time. It could even prove to be misleading and would to my mind add nothing of value to the plan.
- 3.1.25 Insofar as public transport accessibility would help to secure S106 agreements from developers, I refer to my comments on policy T13 in chapter 6 of this report.
- 3.1.26 I conclude on this policy overall that whilst in general the housing supply figures appear to be adequate there is a lack of information about house clearance and uncertainty about the requirement which will be included in the final version of RPG13 once it is published. This will inevitably mean a review of the situation at the modification stage of the plan. In the meantime, subject to my comments on individual allocations, I am satisfied that there need to be no substantial changes to the housing land supply.
- 3.1.27 At present there also remains a discrepancy at regional and local level about the proportion of housing allocations which should be provided on brownfield sites. This is a matter which can only be resolved once the final version of the RPG is published. However the allocations proposed by the Council are only slightly lower than the 80% currently proposed. The simple approach of phased housing allocations reserving greenfield sites until last is generally satisfactory in the light of the need to provide market choice for developers, the constraints inherent in developing some of the sites, the settlement pattern of Tameside and the location of the proposed allocations. Finally

I do not consider it necessary to refer explicitly to public transport accessibility in each housing allocation.

- 3.1.28 I note here that whilst there is no specific policy for the development of unallocated greenfield sites, the Council will deal with any such applications in accordance with PPG3 which in effect precludes such development whilst previously developed land is available. If it is not available there is the requirement for a sequential test to be applied. Any such applications which do arise I would also expect to be influenced by the Council's annual monitoring results. I consider it would be helpful if the Council's position on its treatment of applications for housing development on unallocated greenfield sites were to be set out explicitly in the plan. As it stands at the moment neither policy H1 nor its reasoned justification distinguish between brownfield and greenfield windfall sites and as proposed in the revised deposit version of the plan policy H2 refers only to brownfield sites.

Recommendation

3.1.29 I recommend :

- i) that the housing land provision figures be reviewed at the modification stage to take account of house clearance and also, if available in the adopted version, the guidance in RPG13
- ii) that once final figures are available and if there remains a discrepancy between the housing requirement and supply in policy H1 and table 1, the reason for the difference should be set out in the text accompanying the policy.
- iii) that the policy should make it clear that the release of allocated greenfield sites will take account not only outstanding commitments and allocated brownfield sites, but also make an allowance for windfalls.
- iv) that subject to regional planning guidance being published in its final version, the target for previously developed land be reviewed at the modification stage of the plan in light of the guidance in RPG13.
- v) that policy H1 and its reasoned justification distinguish between applications for housing development on unallocated greenfield sites and applications for housing development on unallocated previously used land.

POLICY H 1(1)

Housing Land Provision - Booth Road, Audenshaw

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Andrew Bennett MP	81	19	O	
Environment Agency	279	254	O	
OBJ NO	SUMMARY OF OBJECTION			
19	The area is in danger of becoming over-developed and there are access problems. Development could inhibit the regeneration of East Manchester			
254	Environment Agency records indicate the presence of great crested newts on this site.			

Main Issues

- 3.2.1
- i) Whether development of the site would result in overdevelopment of the area.
 - ii) Whether the constraints of developing the site can be overcome
 - iii) Whether allocation of the site would harm the regeneration of East Manchester.

Conclusions

- 3.2.2. I note here that there is a typographical error in the 5th line of the policy where it says planning application rather than *planning permission*.
- 3.2.3 **The first issue.** H1(1) is an allocated site in the adopted UDP. It has an area of about 3 ha just over half of which is previously used land. The remainder is a field bounded to the north by the Manchester to Guide Bridge railway line. Its eastern boundary is contiguous with the district's boundary with Manchester. Although it is on the northern fringes of a large area of open land consisting of primarily golf courses, reservoirs and school playing fields, it also abuts an extensive residential area. There is Fairfield railway station just to the north on Booth Road and a regular bus service along Manchester Road/Ashton Old Road. It is therefore well situated for public transport. There is also a local shopping centre on Ashton Old Road. Despite the element of greenfield land included within the allocation and subject to a scheme coming forward which would maximise the use of land, I consider the site is broadly in accord with the sustainable principles for development set out in PPG3.
- 3.2.4 The Council consider the site lies within the urban area and I see no reason to disagree with that view. Because of the extent of open land in the locality I do not consider, in principle, that its loss would have a significant impact on the character of the area. Moreover because the land is within private ownership its development would not affect the provision of open space. Even should the Waterside Park development eventually go ahead, there would still remain the recreational areas around Gorton reservoirs and extensive school playing fields.
- 3.2.5 In 1993 the Council resolved to grant planning permission for a development of 83 houses on the site subject to an agreement to ensure off site highway works were carried out. These included upgrading Booth Road railway bridge and making improvements to Booth road itself. These improvements would still be required and policy T14 of the UDP would require a transport assessment to confirm that such measures would be acceptable in terms of impact on Booth Road and Clarendon Road. The Council are confident that the costs involved in the improvement works would not be prohibitive to development of the site. In any event such costs ought to be reflected in the price of the land.
- 3.2.6 Concerns have been raised about the capacity of local schools to cater for additional development, but figures produced by the Council indicate that there is spare capacity in primary schools. The situation is different in respect of secondary schools, but given the relatively low number of pupils that would be generated on a development of 3 ha, plus the Council's ability to seek contributions towards additional secondary school places, I do not believe concerns of this nature are sufficient to warrant the deletion of the site from the plan.
- 3.2.7 **Now turning to the second issue.** At the draft deposit stage the Environment Agency indicated that there were great crested newts on the site. As a result of this comment the Council included this information in the revised deposit draft and the Agency confirmed that they had no objection to the new wording, but did not formally withdraw the objection. Great crested newts are a European protected species by the Habitats Directive (EC Directive 92/43/EEC) and the UK Biodiversity Action Plan. However it is not unusual for development sites to contain protected species and for development in some form or other to go ahead.
- 3.2.8 In this particular case there is a paucity of information. The Agency say only that their records show the presence of great crested newts. Moreover by implication, subsequent

correspondence with them indicates that they are content for the revised wording in the policy to remain. They do not seek the deletion of the policy because of the protected species. Given this situation together with the other statutory controls available, it appears likely that development would be able to go ahead. I am therefore satisfied that the allocation remain in the plan.

- 3.2.9 **The third issue** concerns the regeneration of East Manchester. I understand that the scale of proposals in Openshaw, Beswick and Clayton are far greater than envisaged within Tameside in that 12000 new houses are planned. Given this situation I do not consider that the minor scale of development proposed in the Fairfield/Audenshaw area would pose any serious threat in terms of numbers or quality of development proposed.

3.2.10 I conclude overall that housing allocation H1(1) should remain in the plan

Recommendation

- 3.2.11 I recommend that in the 5th line of the policy *planning application* should be replaced by *planning permission*.

POLICY H 1(2)

Housing Land Provision - Audenshaw Road depot

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Action Against Kingswater Park (Waterside Park)	8	424	O	
Andrew Bennett MP	81	17	O	
Arrowcroft Group plc	30	631	S (rd)	
OBJ NO	SUMMARY OF OBJECTION			
424	Insufficient attention to PPG3. Site fails to achieve sustainability through poor public transport.			
17	The proposals still fail to meet many of the general policies in the draft plan.			
631	Support the additional wording which maintains allocation for residential development.			

Main Issue

- 3.3.1 Whether the allocation of the site for housing purposes is in accord with PPG3 and other UDP policies.

Conclusions

- 3.3.2 The allocation is part of the wider Waterside Park scheme for a strategic employment site. The Council's position is if the 1998 planning application is refused without a clear opportunity for resubmission both allocations E1(2) and H1(2) should be deleted from the UDP, the golf courses protected as existing green space, with the remaining parts of the site unallocated. At the time of writing this report the application had again been refused by the Secretary of State and a further legal challenge had been made to that decision in December 2002. As I understand it the Council are currently studying the situation and intend to clarify their view at the modification stage of the plan.
- 3.3.3 It will be evident from my conclusions on policy E1(2) that I consider the employment element of the Waterside Park development should be deleted from the plan and the

golf courses designated protected green space under policies OL4 and OL5 of the UDP. However I consider the situation is different for policy H1(2). Whilst the Council link H1(2) and E1(2) it seems to me that the UDP housing allocation should in principle be considered independently from the employment site.

- 3.3.4 H1(2) is within the urban area and relatively close to schools and shops and employment areas. It also enjoys reasonable accessibility by public transport. It adjoins Audenshaw Road which is one of the Quality Bus Corridors identified by the GMPTE and Fairfield train station is about 1km away. It is therefore in a sustainable location.
- 3.3.5 Where it is not in accord with PPG3 is that it contains an element of greenfield land. Whilst the Council say that the unused portion of the land, which is the remainder of a former reservoir) would serve a better purpose if it was recycled for housing, there is no evidence to justify this. The land is currently seen as part of the wider open area of which it forms a part. The greenfield part of the allocation is also clearly separated from the bulk of the site by Kings Road. It does not therefore form an integral part of the site. In addition the south western boundary of the site follows an arbitrary boundary. Lastly taking account of my conclusions to policy H1 above, I have seen no cogent arguments which convince me that the site is necessary to meet the housing requirement. This view is reinforced by the Council's alternative proposals of deleting the site should the waterside Park development not go ahead.
- 3.3.6 I appreciate that part of the land can be categorised as brownfield for the purposes of PPG3. However this portion of the site appears to be still in use and although it may not be currently utilised to its full potential, it does nevertheless still serve a useful employment purpose. Given these factors I consider it would be inappropriate for even the brownfield portion of the site to be allocated for housing purposes. Having said that, it may be that during the life of the plan the circumstances at the site change and proposals for housing on it or part of it are brought forward. In that event I am satisfied that there are policies in the plan such as E3 and H2 against which the merits of such development can be tested. I conclude on this issue that policy H1(2) should be deleted from the plan

Recommendation

- 3.3.7 I recommend that policy H1(2) be deleted from the plan and the land be left unallocated.

POLICY H 1(3)

Housing Land Provision - Staley Road, Mossley

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Roland Bardsley Homes	658	39	O	
Mr J Winterbottom	855	620	O	
OBJ NO	SUMMARY OF OBJECTION			
39	The site has been proposed for development for many years. Land assembly appears to be a problem			
620	Will cause increased traffic congestion, destroy a green environment, create a less safe environment			

Main Issues

- 3.4.1 i) Whether the site is capable of development within the plan period.
ii) Whether development of the site would harm highway safety in particular by increasing traffic congestion or because of its access arrangements.

Conclusions

- 3.4.2 **The first issue.** The Council acknowledge that the site is subject to numerous constraints including dereliction, topography, ground conditions, flooding, land assembly and the like. Notwithstanding this a planning application was submitted for the erection of 115 houses on 4.6 ha of the site. It appears however that this is now likely to be amended to relate to only part of the site, that is, to allocation MOS4 in the adopted UDP which is the site of the former Hollins and Springbank Mills. This is the part of the site which is not subject to ownership difficulties. It is therefore likely that at least half the allocation would be developed within the plan period. I acknowledge that there is strong local opposition to the planning application, but I do not see this as an overriding matter in considering the appropriateness of the allocation in the UDP. Opposition to individual planning applications can often be overcome by alterations to details.
- 3.4.3 The Council are confident that not only the Staley Road part of the site, but also the Micklehurst Road portion is capable of development within the plan period and I do not find this to be unrealistic. None of the problems associated with development of the site appear to be incapable of resolution. The planning application indicates that there is current interest in the whole of the site and a two phase programme of building would be likely to ensure completions over a longer period.
- 3.4.4 Whilst granting planning permission does not mean that development will follow, it is a necessary step along the way. Moreover in my view it seems likely that as fewer unencumbered greenfield sites become available for development, attention will inevitably turn to those sites which in the past have proved problematic and not as easy to develop. In the case of this allocation, development of the lower portion of the site would not only contribute towards the Council's housing supply it would also assist in the reclamation of a derelict site.
- 3.4.5 I now turn to **the second issue.** In considering the current planning application the Council's Engineering development section has not raised any fundamental objections to the development of the site in terms of the generation of additional vehicles on local roads or in terms of access onto Micklehurst Road. I have no substantive information before me which fundamentally challenges that position either in terms of this allocation on its own or when taken together with other allocations in Mossley.
- 3.4.6 I am mindful that the upper part of the site is predominately greenfield and used for informal recreation by local people, even though it is in private ownership. The current planning application indicates that both parts of the site are capable of development independently. Whilst the site is currently required to meet the Council's supply of housing land, this might not be the case should the overall housing figures be rounded down at the modification stage. There is in addition a preponderance of sites allocated for development within Mossley. Given these factors, deletion of part of the allocation would not therefore result in a shortage of housing land in this part of the district. However, in the event that the housing targets justify the retention of the site, I consider in the light of its greenfield nature it should be allocated as a phase two site in the same way and for similar reasons as allocation H1(12).

Recommendation

- 3.4.7 I recommend that the inclusion of the upper half of this site (that is MOS5 in the adopted UDP) be reviewed at the modification stage of the plan and be either deleted or allocated as a phase 2 site.

POLICY H 1(4)

Housing Land Provision - Oakwood Mill, Millbrook

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Roland Bardsley Homes	658	40	O	
OBJ NO	SUMMARY OF OBJECTION			
40	Queries whether this site, on the market for many years, has any real prospect of being developed.			

Main Issue

- 3.5.1 Whether the site is likely to be developed within the plan period.

Conclusions

- 3.5.2 The objection was made to allocation H1(4) in the draft deposit UDP. Since that time in the revised deposit draft the allocation has been extended, increasing the site area from 1.25 to 7.4 ha. The larger area includes Stayley Cricket Club's ground and a shallow clough that drains into Swineshaw Brook. It also takes in a SBI. In the draft deposit plan the additional land was for the main part identified as protected green space.
- 3.5.3 Although over the years interest has been shown in the mill. No proposals were ever implemented. Oakwood Mill is a grade II listed building which was extensively damaged by fire in 1995 and has since then continued to deteriorate. It is now on the Buildings at Risk register as a category A site. The allocation was changed in part to enable a viable conversion of the mill to take place and this has stimulated interest in the development of the mill and its surroundings.
- 3.5.4 Following the revised allocation a planning application was submitted in May 2002 for the conversion of the mill/engine house and boiler house into 36 residential units and the erection of 37 new dwellings 16 within the mill complex and the remaining 21 on the former protected green space land. An additional 21 dwellings are shown, but not included in the application on an independent site with access directly from Huddersfield Road. I have seen no information which leads me to conclude that there are other constraints on the site which would preclude its development. At the present time therefore the indications are that the allocation is capable of being taken up within the plan period.
- 3.5.5 I am however puzzled by the full extent of the Council's revision to policy H1(4) as it appears to include land which apparently the Councils intend should not be developed for residential purposes. This includes the cricket ground and land on the northern extremity of the site. As far as I am aware there is no development brief for the revised site and I have seen no information which satisfactorily explains the apparent contradiction. The revised allocation therefore appears to be unnecessarily large and

could in my view result in pressure for the Council to release more greenfield land than required to stimulate a viable conversion of the mill.

- 3.5.6 It would to my mind give a clearer indication to developers, if the land which the Council did not intend to release for development were to be either allocated as protected green space or left unallocated. It follows from this that I consider the Council should review the extent of the allocation at the modification stage and include within the housing allocation only that land which they believe necessary to achieve the refurbishment of the mill.

Recommendation

- 3.5.7 I recommend that the area of policy H1(4) be modified to exclude those areas of land which the Council do not intend to release for development.

POLICY H 1(7)

Housing Land Provision - Market Street, Droylsden

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Roland Bardsley Homes	658	41	O	
OBJ NO	SUMMARY OF OBJECTION			
41	Doubtful if the site can come forward within the first 5 years as there are land assembly problems.			

Main Issue

- 3.6.1 Whether the site is capable of being developed within the plan period.

Conclusions

- 3.6.2 There is no necessity for the site to be available in the first 5 years of the plan as the housing allocations are intended to meet the requirement until 2011.
- 3.6.3 Policy area H1(7) was identified as a Development Opportunity Area in the adopted UDP policy DRO7 and has not yet been developed. However the indications are that progress has been made. I understand the Council is actively involved in bringing the site forward in partnership with a private developer and a planning application will be made sometime in 2003. It appears that land assembly will take place in 2 phases - firstly by the Council and secondly by a private company. The Council is confident that the site can be developed within the plan period and the information I have seen does not cause me to doubt this.

Recommendation

- 3.6.4 I recommend no modification to the plan as a result of this objection.

POLICY H 1(8)

Housing Land Provision - Reyners depot, Droylsden

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Roland Bardsley Homes	658	42	O	
OBJ NO	SUMMARY OF OBJECTION			
42	Satisfactory access has yet to be achieved and there is no certainty that the site will be available in the first 5 years.			

Main Issue

3.7.1 Whether the site is capable of being developed within the plan period.

Conclusions

3.7.2 Events have overtaken the objection. The access problems have been resolved. Planning permission was granted for housing development in September 2002 and a start has now been made on site. The objection is therefore groundless.

3.7.3 However the Council seek to update the plan to reflect the current position. They propose the deletion of policy H1(8) as the site is no longer proposed but committed. And to reflect this its inclusion in an updated version of Table 2 "*Dwellings under construction or remaining on sites already started*". I support the change as it reflects the up to date position.

Recommendation

3.7.4 I recommend that policy H1(8) be deleted and the allocation be included in table 2 between pages 39 and 40 in the UDP.

POLICY H 1(10)

Housing Land Provision - Tame Street, Mossley

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
English Nature	277	654	O (rd)	Yes
W I S H Properties	825	441	S	
OBJ NO	SUMMARY OF OBJECTION			
654	The policy does not mention the Huddersfield Narrow Canal SSSI.			
441	Support inclusion of this site which is well related to Mossley and is partly previously developed.			

Main Issue

3.8.1 Whether reference should be made to the Huddersfield Narrow Canal SSSI.

Conclusions

3.8.2 The Council agree that reference to the SSSI is an omission from the policy and propose adding at the end of the explanatory text the following *The Huddersfield Narrow Canal, south of Roaches Bridge (the southern corner of the site) is a Site of Special Scientific*

Interest and any development proposed in the vicinity of the canal will be subject to close scrutiny to establish whether it might have an adverse effect on the special nature conservation interest of the site. The canal north of Roaches Bridge is a Grade A Site of Biological Importance and this should also be taken into account in any development.

- 3.8.3 The objectors have indicated that they will withdraw their objection subject to the proposed change being incorporated into the plan. I support this change which acknowledges an interest of acknowledged importance and is in the nature of an informative for any prospective developer.

Recommendation

- 3.8.4 I recommend that the plan be modified by adding at the end of the explanatory text the following *The Huddersfield Narrow Canal, south of Roaches Bridge (the southern corner of the site) is a Site of Special Scientific Interest and any development proposed in the vicinity of the canal will be subject to close scrutiny to establish whether it might have an adverse effect on the special nature conservation interest of the site. The canal north of Roaches Bridge is a Grade A Site of Biological Importance and this should also be taken into account in any development.*

POLICY H 1(11)

Housing Land Provision - Cromwell School, Denton

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Action Against Kingswater Park (Waterside Park)	8	429	O	
Sport England	711	575	O	Yes
OBJ NO	SUMMARY OF OBJECTION			
429	This will occupy current open space in Denton, which has a lower provision than the Borough average.			
575	The allocation should not encroach onto the playing field. There needs to be greater safeguards to ensure suitable replacement fields can be provided on the hillside.			

Main Issue

- 3.9.1 i) whether the allocation should exclude the playing field.

Conclusions

- 3.9.2 Events have overtaken the objections. Outline planning permission has been granted for residential development on the whole of the site and I understand that suitable compensation provision has been arranged to the satisfaction of Sport England. In practical terms therefore it would serve little purpose to comment on the details of the objections.
- 3.9.3 In the light of the planning permission however the Council wish to change the plan by deleting allocation H1(11) and including the site in Table 3 *Dwellings with planning permission on sites not started* in the UDP between pages 39 and 40. I support the change which up dates the situation in respect of housing land supply.

Recommendation

- 3.9.4 I recommend that the plan be modified by the deletion of policy H1(11) and the inclusion of the site details in table 3 of the UDP.

POLICY H 1(12)

Housing Land Provision - Huddersfield Road, Mossley

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
V W Caffery	133	68	O	
English Nature	277	231	O	
Mrs Jane Lee	471	452	O	
Roland Bardsley Homes	658	37	O	
Mr J Winterbottom	855	621	O	
English Nature	277	655	O (rd)	
OBJ NO	SUMMARY OF OBJECTION			
68	Concern about access to school playing fields, nature conservation interests and adequacy of the road network.			
231	There should be consideration of the impact of development on the adjacent Site of Biological Importance.			
452	The development would result in over-stretched local services, harm to nature conservation, problems with relocating the playing fields and traffic problems.			
37	The suitability of this large greenfield site, constrained by slope and biology, is queried.			
621	Development will cause increased traffic congestion, destroy a green environment, create a less safe environment			
655	The text should cover issues of mitigation and compensation and the legal implications with regard to impacts on the SBI.			

Main Issues

- 3.10.1 i) Whether the policy safeguards nature conservation interests and the position of the SBI in relation to development.
 ii) Whether the site is capable and suitable for development within the plan period.
 iii) Whether the development of H1(12) together with other housing allocations would over-stretch local services and harm the character of the area.

Conclusions

- 3.10.2 The Council consider that there is merit in some of the objections and propose changes to the text accompanying the policy. These are ... This part includes a Site of Biological Importance (Puddle Clay Pits – Grade B) *covering 4.5 hectares on its lower, western side. This area is to remain entirely outside any proposed housing development, and there will be obligations on the developer for its protection against both the direct and indirect impact of development and for its future management. In view of concern about landslips on the site, any development proposals will need to be accompanied by a specialist slope stability report.....* (The additions to the text are in italic).
- 3.10.3 **In respect of the first issue** I support the changes which add clarity and give suitable protection to the Puddle Clay Pits SBI. In the light of the Councils' view however that 4.5 ha of the allocation should remain outside any proposed housing development, I would question the necessity for this area to be included within policy H1(12). I believe it would be more realistic for the SBI to be removed completely from the housing allocation. This would have no adverse impact on the overall housing supply and I see no reason why it should compromise the Council's ability to seek the protection and future maintenance of the SBI.
- 3.10.4 **I now turn to the second issue.** Site H1(12) is the only entirely greenfield allocation within the plan and is allocated as a phase 2 site where development will not begin before 2006 and then only if a 5 year supply of land is unavailable through either outstanding commitments and the remaining brownfield allocations. Its development would not therefore undermine national policy guidance which seeks to give priority to

recycling land in the urban areas. The indications at present are that it is still likely to be required to meet the housing requirement, although this position may change once the regional figures have been finalised and the Council have included an allowance for clearance in their final calculations. In the meantime however I consider that in principle the allocation should remain in the plan.

- 3.10.5 There are constraints on the site which would effectively make about half of it undevelopable. However the Council are confident that the remainder is capable of development within the plan period and that problems such as the steepness of the slopes, the safeguarding of nature conservation interests, the stability of the land and the replacement of the school playing fields, together with access to and from Huddersfield Road can be successfully addressed. I have seen no evidence which seriously challenges that view.
- 3.10.6 **In respect of the third issue**, there are 4 sites allocated for housing development in Mossley which the Council estimate could accommodate about 2000 people. This represents about 20% increase in population. In principle there do not seem to be any overriding highway problems which cannot be overcome and Mossley benefits from a rail link and a regular bus service. There would therefore be a choice of transport modes for new residents. Policy H6 enables, where necessary, the Council to seek provision of additional or extended educational and community facilities from developers, H10 requires high quality of design and H5 seeks open space provision. The matter of impact of individual developments on the area could therefore be addressed at the planning application stage.
- 3.10.7 The allocations would be developed throughout the plan period with at least 12 ha held in reserve for development in the second half of the plan, at the earliest. The proposed growth would therefore be incremental. Overall on this issue I share the view of the Council that the housing proposals represent a further stage in the development of Mossley and could well, through population growth and the reclamation of derelict land benefit the area economically and socially without fundamentally damaging the individual character of the town or over-stretching services and transport links.

Recommendation

- 3.10.8 I recommend that
- i) Clay Puddle Pits SBI be removed from policy H1(12).
 - ii) The proposed changes suggested by the Council and set out in paragraph 3.10.2 above be amended to take account of the deletion of the SBI from the housing allocation.

POLICY H 1(14)

Housing Land Provision - Hattersley

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Alternative Proposals on Transport	270	189	O	
Anne Robinson	654	556	O	
OBJ NO	SUMMARY OF OBJECTION			
189	High density housing should be sought along with employment uses on accessible brownfield land.			
556	High density housing should be sought along with employment uses on accessible brownfield land.			

Main Issue

3.11.1 Whether the policy should refer to the local employment opportunities.

Conclusions

3.11.2 At the inquiry the Council suggested the replacement of the final 2 sentences of the policy with the following. *Up to now 22 sites with a combined area of 5.8 hectares are available although, depending on the outcome of the master plan, some may be redeveloped for non-residential purposes such as employment. If all were developed at 30 per hectare they could produce approximately 180 dwellings, although higher densities may be feasible and desirable.* I note in the Council's response to objection 189 the wording of the proposed change is slightly different although it does not alter the meaning of the text.

3.11.3 The addition of these 2 sentences makes it clear that the Council in principle supports the creation of mixed use areas which are in accord with sustainable principles. However as the strategic master plan for Hattersley is not yet agreed, it would to my mind be premature for the allocation to refer in more detail to employment opportunities at this stage. It follows from this that I support the change proposed by the Council.

Recommendation

3.11.4 I recommend that policy H1(14) be modified by replacing the final 2 sentences of the policy with *Up to now 22 sites with a combined area of 5.8 hectares are available although, depending on the outcome of the master plan, some may be redeveloped for non-residential purposes such as employment. If all were developed at 30 per hectare they could produce approximately 180 dwellings, although higher densities may be feasible and desirable.*

POLICY H 1(15)

Housing Land Provision - Fairfield Golf and Sailing Club

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Action Against Kingswater Park (Waterside Park)	8	425	O	
Andrew Bennett MP	81	18	O	
OBJ NO	SUMMARY OF OBJECTION			
425	The site is not in a sustainable location as it has poor public transport.			
18	Area is in danger of becoming over-developed and there are access problems. Development could inhibit the regeneration of East Manchester			

Main Issue

3.12.1 Whether allocation of the site is in accord with sustainable principles in PPG3.

Conclusions

3.12.2 H1(15) is a previously developed site within the urban area adjacent to a railway station and close to bus routes. The proposals map indicates that it is relatively close to 2 local shopping centres/parades and there are a variety of schools in the locality. In principle therefore I consider its location is in accord with sustainable principles set out in PPG3.

- 3.12.3 I note however that if the employment allocation E1(2) is deleted from the plan then it is most unlikely that H1(15) will come forward for development. In this respect my conclusions on E1(2) should be read.
- 3.12.4 Insofar as the objection by Mr Bennett is concerned. It raises the same general concerns as expressed in connection with H1(1) and my conclusions on that policy apply equally to policy H1(15), particularly issue i) and iii) and access concerns. To avoid duplication my conclusions on H1(1) to be found at paragraph 3.2.2-3.2.10 above should therefore be read.

Recommendation

- 3.12.5 I recommend no modification to the policy as a result of these objections.

POLICY H 1(16)

Housing Land Provision - Stayley Hall, Millbrook

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
English Heritage	276	649	O (rd)	
OBJ NO	SUMMARY OF OBJECTION			
649	It is premature to indicate the number of dwellings which could be provided. A development appraisal is needed first.			

Main Issue

- 3.13.1 Whether the policy should specify the number of dwellings.

Conclusions

- 3.13.2 H1(16) is a new allocation added at the revised deposit stage. It was included after a feasibility study undertaken on behalf of the owners together with a marketing exercise concluded that a residential development was the only viable option to ensure the survival and restoration of Stayley Hall, a Grade II* listed building. The allocation extends to some 5.5 ha and according to the Council has a capacity of about 50 residential units. According to the Council this involves the conversion of the Hall and its outbuildings to 16 flats and the erection of about 34 new dwellings. I understand a planning application was received by the Council in late 2002, although I have seen no details.
- 3.13.3 There is a balance to be struck in considering the need to safeguard the future of the listed building and the impact new development would have on its setting. The details of that are more suitable for consideration as part of a planning application. However I see no reason why recognition of this balance should not be referred to in the policy. The Council suggest that it be changed to read Allowing for the physical characteristics of the site it is estimated that approximately 50 dwellings could be provided including the conversion, *subject to appraisal of the impact of any proposals on the historic environment*.... (The change is set out in italic script). I consider this change is an improvement which recognises that a balanced judgement must be made and I support its inclusion.

Recommendation

3.13.4 I recommend that the policy be changed by the inclusion of the words ..subject to appraisal of the impact of any proposals on the historic environment... as set out in paragraph 3.13.3 above.

POLICY H 2

Unallocated Sites

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Redrow Homes (North West) Ltd	643	473	O	
OBJ NO	SUMMARY OF OBJECTION			
473	The policy is too rigidly expressed to allow for the circumstances under which previously developed sites come forward			

Main Issue

3.14.1 Whether the policy as set out is in accord with the objectives of PPG3.

Conclusions

3.14.2 The objection was made to the deposit draft edition of the UDP. At the revised deposit stage the policy was completely rewritten. In its present form I consider that it is in accord with PPG3 as it is permissive of the recycling of land and buildings unless other considerations take precedence.

3.14.3 I note here that there is no commensurate policy for the treatment of unallocated greenfield sites which may be brought forward for development. I address this matter at policy H1 above.

Recommendation

3.14.4 I recommend no modification to the plan as a result of this objection.

POLICY H 4

Type, Size and Affordability of Dwellings

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Government Office for the North West	327	283	O	
The Grosvenor Group	354	467	O	
House Builders Federation	408	414	O	
Redrow Homes (North West) Ltd	643	474	O	
Roland Bardsley Homes	658	45	O	
Countryside Agency	190	634	O (rd)	
Countryside Agency	190	105	S	
Greater Manchester Passenger Transport Executive	339	685	S (rd)	
OBJ NO	SUMMARY OF OBJECTION			
283	The policy should be based on an up to date assessment of need indicating the number of units to be provided. Fixed contributions need to be by agreement. The policy should contain criteria on eligibility and control of occupancy.			
467	The policy amounts to a tax on development regardless of proven need. The criteria for decisions need to			

	be in the plan and not SPG.
414	There is no evidence of need. A community fund is contrary to Government advice. Policy should not be delegated to SPG.
474	As written the policy amounts to a tax on development regardless of proven need. The criteria for decisions should be in the plan
45	There are many concerns about the community fund, especially the absence of thresholds and affordability needs.
634	The policy does not seem to be based upon rural affordable housing needs surveys.
105	Would welcome findings on whether there are needs outside the urban area.
685	Inclusion of public transport considerations for affordable housing is supported (but see obj to H1)

Background

- 3.15.1 Insofar as the objections are to the community fund, that element of the policy was dropped from the revised deposit version of the UDP and I make no comment on it. Moreover many of the objections were to the draft deposit wording of the policy which was extensively rewritten at the revised deposit stage. Where I consider events have overtaken the objections I do not make specific comments on these objections either.

Main Issue

- 3.15.2 Whether the policy is in accord with the objectives of PPG3 and Circular 6/98 and has been informed by an up to date housing needs survey.

Conclusions

- 3.15.3 The Council's Housing Demand and Needs Survey was not finalised until after policy H4 was rewritten in the revised draft. Broadly I understand that it does not show sufficient evidence of a need for additional affordable housing to meet local needs in any area of the Borough (including the rural areas) up until 2006. There is therefore insufficient evidence to justify a requirement for such housing from developers. In practice this means that the provisions of policy H4 will not be required for the present. However the Council will continue to monitor the situation and if there is a change, intend producing SPG to explain how the affordable housing element will work.
- 3.15.4 With the demonstrable lack of need at the moment, I consider it would be unproductive for the Council to seek to produce a more detailed policy at present. The appropriate time for that to be produced is if or when subsequent surveys indicate that there is a need and in which areas that need lies. If a need is identified before a review of the plan, in seeking to produce SPG, I consider the Council are adopting a pragmatic approach to the particular circumstances of Tameside.
- 3.15.5 As rewritten the policy is more in line with national policy and includes criteria to be taken into account. However it is evident that the text accompanying the policy is now out of date and in order to clarify the situation I consider it should be updated to reflect the position (at the modification stage) with regard to affordable housing. Both to define what the Council mean by affordable housing and to state explicitly that if any interim SPG is required, before a review of the plan, it will be in accord with the provisions of Circular 6/98 and PPG3.

Recommendation

- 3.15.6 I recommend that
- i) **the text accompanying the policy be modified to include an explanation of the consequences of the results of the Housing Demand and Needs Survey on the Council's application of policy H4**

- ii) the text accompanying the policy be modified to define what the Council mean by affordable housing and to state explicitly that any SPG relating to affordable housing will be produced in accord with the provisions of Circular 6/98 and PPG3.

POLICY H 5

Open Space Provision

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Action Against Kingswater Park (Waterside Park)	8	431	O	
The Grosvenor Group	354	468	O	
House Builders Federation	408	415	O	
Redrow Homes (North West) Ltd	643	475	O	
Roland Bardsley Homes	658	46	O	
Trustees of Mrs E Bissill's Fund & Stayley Developments Ltd	807	706	O (rd)	
Countryside Agency	190	106	S	
OBJ NO	SUMMARY OF OBJECTION			
431	It is unrealistic to think the Council will pursue community fund expectations when taking into account the competition to attract development			
468	It is inappropriate to require development to fund the provision of play space unrelated to the scheme itself.			
415	Developers should not be required to contribute to a community fund as a matter of course.			
475	It is inappropriate to require development to fund the provision of play space unrelated to the scheme itself.			
46	A community fund is contrary to the tests for planning obligations. Open space needs must be proved			
706	Requirements to fund open space should exclude schemes which have abnormal development costs.			
106	Suggests we may wish to explore the idea of a quota of informal open land per new dwelling.			

Background

3.16.1 Some of the objections are to the draft deposit wording of the policy which was extensively rewritten at the revised deposit stage. Insofar as the objections are to the community fund, that element of the policy was dropped from the revised deposit version of the UDP and I make no comment on it. Moreover where I consider events have overtaken the objections I do not make specific comments on these objections either.

Main Issues

- 3.16.2 i) whether the policy is reasonable and fairly relates to proposed development.
 ii) whether supplementary planning guidance should be used as the mechanism to explain the operation of the fund including the level of contributions.
 iii) whether requirements to fund open space should exclude schemes which have abnormal development costs or a small number of units.

Conclusions

3.16.3 **The first issue.** The revised deposit version of the policy says that where there is a deficiency developers will be required to provide open space proportional to the intended number of occupants of a scheme, in a safe and convenient location either within or in close proximity to the site. Alternatively where this is not practical the Council will seek an equivalent payment to contribute towards facilities which are fairly and reasonably related to the needs of the housing development and which will be

of benefit to the residents of a scheme. The policy as rewritten is more focussed as it relates specifically to the needs arising from the development.

- 3.16.4 **With regard to the second issue**, PPG12 says that the Secretary of State will give substantial weight to SPG which comes from and is consistent with the development plan and has been prepared in the proper manner. This means that it has to be prepared in consultation with the general public, business and other interested parties and their views taken into account before it is finalised. It must also be consistent with national and regional planning policies. In H5 the Council set out the principles of how the policy will work and to my mind quite properly leave the details to be amplified in SPG. I do not consider the policy seeks to delegate the criteria for decisions on planning applications to SPG.
- 3.16.5 PPG17 is permissive of the use of planning obligations as a means of remedying local deficiencies in the quantity or quality of open space, sports and recreational provision. It says that Councils will be justified in seeking planning obligations where the quantity or quality of provision is inadequate or under threat, or where new development increases local needs. National policy does not therefore recognise that there should be exceptions because of the particular costs of developing land or the scale of development.
- 3.16.6 **Finally the third issue**. Policy H5 is not concerned with detail costs nor in my view should it be. Its objective is to ensure that open space provision keeps pace with housing development and is in accord with PPG17. To provide for exceptions would negate the objective of the policy. Moreover development costs can vary widely and are dependent on numerous factors, some of which are known at the planning application stage and some of which are not. From a practical point of view the calculation of development costs would have to rely on a degree of speculation. There would need to be a value judgement made not only about when development costs on a particular site were likely to be *stringent* but also if any of those costs could have been reduced in any way. I do not consider this to be an appropriate matter for this land use policy to address. It would inevitably result in a degree of uncertainty for developers. Moreover it seems to me that once the policy is adopted the need for open space provision in areas of deficiency will be built into developers calculations in respect of land values, costs and returns.
- 3.16.7 In the event that it was claimed that such a financial contribution would make a scheme uneconomic, it will remain up to the Council to determine, on an individual basis as part of the development control process, whether that is a material consideration sufficient to override the provisions of the development plan.
- 3.16.8 I consider the policy also deals satisfactorily with scale as it says quite clearly that where there is a need for the provision of open space, the requirement on the developer/house builder will be proportionate in both scale and kind to the intended number of occupants. It seems to me that this is a fair and equitable way of requiring contributions towards the provision of open space. Given these circumstances I do not therefore support the view that the policy should be modified to allow for exceptions.

Recommendation

- 3.16.9 **I recommend no modification to the policy as a result of these objections.**

POLICY H 6

Education and Community Facilities

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
The Grosvenor Group	354	469	O	
House Builders Federation	408	416	O	
Roland Bardsley Homes	658	47	O	
Sport England	711	578	O	
Countryside Agency	190	107	S	
OBJ NO	SUMMARY OF OBJECTION			
469	It is inappropriate to require development to fund education facilities unrelated to the scheme itself.			
416	Developers should not be required to contribute to a community fund as a matter of course.			
47	The policy is vague and needs clarification. A one-off payment for all development is unfair. It gives no assurance that local deficiencies will be addressed.. Contributions should not be required where it would make a development uneconomic.			
578	It would be useful to clarify if sport and recreation are included in the definition of community facilities.			
107	Support especially in regard to community facilities in small settlements.			

Background

3.17.1 Some of the objections are to the draft deposit wording of the policy which was extensively rewritten at the revised deposit stage. Insofar as the objections are to the community fund, that element of the policy was dropped from the revised deposit version of the UDP and I make no comment on it. Moreover where I consider events have overtaken the objections I do not make specific comments on these objections either.

Main Issues

- 3.17.2 i) Whether the policy is specific enough and in accord with Government policy.
 ii) Whether exceptions to the policy should be made for developments where there are abnormal costs.

Conclusions

3.17.3 **The first issue.** As written the policy only applies to proposals for new housing developments in areas where education/community facilities would be unable to satisfactorily accommodate additional demands. It says quite clearly that contributions will be proportionate to the intended number of occupants of the new development. It goes on to say that that the policy will only apply to housing schemes of 25 or more dwellings, excluding specialised schemes where the occupiers have no need for education or community facilities.

3.17.4 Although it does not set out explicitly which areas of the borough and which type of scheme will trigger the requirements of the policy, it is clear about the kind of areas and the size/type of scheme. I accept that *the surrounding area* may not be defined, but I understand the difficulty in providing a clearer explanation when catchment areas for different types of facility vary.

3.17.5 Where I do consider the policy to lack clarity is that there is no definition of what is meant by community facilities. The term can cover a wide range of uses and it would be clearer if the Council were to say explicitly what facilities will fall within the scope of the policy. Such a fundamental explanation should in my view be contained within the policy itself and not SPG.

- 3.17.6 The use of planning obligations to ensure the provision of contributions towards deficient facilities will be in accord with Government policy if their requirements are necessary, relevant to planning, directly related to a development and reasonably related in scale. I appreciate that some objectors would like to see more details of the operation of the scheme set out in the policy, but as I have concluded in relation to policy H5 above, in principle I see no problem with such information being provided in SPG if it is prepared in accordance with Government guidelines. Apart from my comments in the paragraph above, I do not consider the policy seeks to delegate the criteria for decisions on planning applications to SPG.
- 3.17.7 My conclusions on **the second issue** are broadly the same for policy H6 as for policy H5 and to avoid repetition paragraphs 3.16.6. and 3.16.7 above should be read. I would only add that whilst the reuse of urban sites is being promoted, it is inevitable that site development costs will in general be higher than when a preponderance of greenfield sites were being developed. Moreover whatever the requirements of development plan policy, it is always open to a developer, if unforeseen costs do arise, to approach the Council. But I consider such cases should be seen as an *exception to the policy* rather than an *accepted exception within it*. To do otherwise would weaken the aims of the policy.

Recommendation

- 3.17.8 I recommend that the text accompanying the policy include a definition of community facilities that will be the subject of the policy.

POLICY H 7

Mixed Use and Density

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Government Office for the North West	327	286	O	
Roland Bardsley Homes	658	49	O	
Greater Manchester Passenger Transport Executive	339	361	S	
OBJ NO	SUMMARY OF OBJECTION			
286	The policy should set out the criteria to be used in judging the acceptability of development. Subparagraph (c) should reflect the provisions of PPG3 para 62.			
49	The Council should review all its current standards as many mitigate against good quality high density designs.			
361	Mixed use developments are an opportunity to help reduce the need to travel.			

Main Issues

- 3.18.1 i) Whether the policy should include criteria to test development against.
 ii) Whether subparagraph (c) reflects the provisions of PPG3 in respect of parking standards.
 iii) Whether the Council standards need to be updated to permit high density, good quality schemes.

Conclusions

- 3.18.2 **The first issue.** The criteria which are to be used in determining planning applications for housing are set out in policy H10. Policy H7 says that as well as its requirements those in policy H10 should also be met. It would serve little purpose if those criteria

were reiterated in policy H7. In addition, apart from H7, other policies within the UDP such as H2 and various open land policies deal with situations where development will be permitted. Given these factors I consider it would add little to the plan if they were repeated in policy H7.

- 3.18.3 **The second issue.** Paragraph 62 of PPG3 says quite explicitly that policies which result in higher levels of off-street parking than an average of 1.5 spaces per dwelling should not be adopted. As written policy H7 is vague. It refers to limited off-street parking taking into account the needs of occupants and the availability of alternative means of transport. It is therefore open to interpretation and debate.
- 3.18.4 I appreciate that in policy T10 the parking standards which are being produced for the whole of Greater Manchester are only in draft form, but this should not in my view preclude policy H7 (c) reflecting the average standard in PPG3. This is because firstly policy T10 says specifically that the standards will be in line with national guidance and secondly the standards reflect maximum levels of parking. I conclude therefore that subparagraph (c) or the reasoned justification to the policy should reflect more accurately government policy set out in PPG3 Paragraph 62. It should state explicitly that on average developments with more than 1.5 spaces per unit are unlikely to be acceptable.
- 3.18.5 **The third issue.** The Council say that they intend updating their SPG for detailed housing design guidance so that it will accord with PPG3. In the meantime I consider the broad principles set out in H7 and H10 are sufficient to ensure the objectives of PPG3 are met. I see no reason to modify the policy in respect of this objection.

Recommendation

- 3.18.6 **I recommend that subparagraph (c) or the reasoned justification accompanying the policy be modified to state explicitly that on average developments with more than 1.5 off street parking spaces per unit are unlikely to be acceptable.**

POLICY H 8

Gypsies, Travellers and Showmen

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
The Gypsy Council - Romani Kris	553	688	O (rd)	
OBJ NO	SUMMARY OF OBJECTION			
688	No land identified for possible future gypsy sites could satisfy all the criteria given.			

Main Issue

- 3.19.1 Whether the criteria are too restrictive.

Conclusions

- 3.19.2 Criteria based development plan policies are in line with advice in PPG12 and Circular 1/94. However in recognition of the validity of the objection and the onerous nature of criteria (a) and (b) the Council propose their deletion. I support this change which leaves a reasonable list of criteria that suitable sites for gypsies, travellers and showmen must satisfy.

Recommendation

3.19.3 I recommend that criteria (a) and (b) be deleted from the policy.

POLICY H10

Detailed Design of Housing Developments

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
House Builders Federation	408	417	O	
Redrow Homes (North West) Ltd	643	476	O	
Roland Bardsley Homes	658	48	O	
OBJ NO	SUMMARY OF OBJECTION			
417	Use of SPG (including community fund details) must be consistent with Government advice.			
476	Government advises against delegating criteria for decision making to SPG.			
48	It must be made clear whether SPG will be guidelines or rigidly applied.			

Main Issue

3.20.1 Whether the policy accords with Government policy on SPG.

Conclusions

3.20.2 The policy was rewritten at the revised draft deposit stage to include criteria against which to judge housing developments. In effect this meets most of the concerns set out by the objectors. As rewritten the policy allows flexibility and the criteria are not overly restrictive. The Council's intention of producing SPG to illustrate the requirements of H10 in more detail is in line with Government guidance in PPG12. Once adopted whilst policy H10 will have Section 54A status, the SPG can only be a material consideration. I do not consider any further modification to the policy is necessary.

Recommendation

3.20.3 I recommend no modification to the plan as a result of these objections

NON POLICY SPECIFIC OBJECTIONS

Housing and Community Facilities

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Mr D Astall, Mr P Stoddard & Dr Johnson	59	77	O	
OBJ NO	SUMMARY OF OBJECTION			
77	The site at Green Lane Hyde is suitable for high quality dwellings.			

Main Issue

3.21.1 Whether the objection site should be allocated for housing development.

Conclusions

- 3.21.2 The objection site is a rectangular area of about 2.5 hectares. It consists of 3 dwellings set in spacious grounds and what appears to be further open land between Abbotsford and Rushafiel Farm. It is within the green belt which separates the built up area of Hyde from Hattersley. The new school to the west of the site lies within the built up area with only the playing fields being located in the green belt. The site is therefore separated from the settlement.
- 3.21.3 I do not agree that the site has an affinity to existing developed sites within the green belt. Policy OL3 is concerned with major developed sites on which there is a significant amount of building, whereas the objection site is a loose group of houses in the rural area of which there are many similar groupings. In addition residential development, even a small number of executive homes, would be unlikely to meet the criteria set out in policy OL3, in particular criteria (c) and (e).
- 3.21.4 Therefore in order for the site to be developed for housing it would need to be removed from the green belt. National policy guidance in PPG2 says that green belt boundaries should only be changed in exceptional circumstances. As will be apparent from my conclusions on policy H1, I do not consider there is at present the need for further sites to be identified to meet the housing requirement in either quantitative or qualitative terms. And I am not aware of any other circumstances which could be described as exceptional. It follows from this that I do not support development of the objection site for housing development.

Recommendation

- 3.21.5 I recommend no modification to the plan as a result of this objection.**

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Express Metal Finishers (Oldham) Ltd	282	515	O	
OBJ NO	SUMMARY OF OBJECTION			
515	Objection to the allocation of New Scout Mill, Mossley as "protected green space". Housing would be more suitable.			

Main Issue

- 3.21.6 Whether the allocation of New Scout Mill as protected green space should be altered

Conclusions

- 3.21.7 Since the refusal (on appeal) of planning permission for residential purposes in January 2002, the objector now considers that the site should be allocated for employment purposes.
- 3.21.8 The employment areas in the adopted UDP have been reviewed as part of the replacement UDP process. The Council explain that, in the adopted UDP, the *working area* allocation was a reflection of existing land use whereas E3 Established Employment Areas designations in the emerging replacement plan have been chosen because of their strategic importance and critical massing. The Council have concluded that the objection site is not of any strategic importance and I have no information to cause me to doubt this view.
- 3.21.9 The new designation as protected open space has come about because of the site's location. The site is detached from the main settlement of Mossley and virtually

surrounded by open land which is in the green belt. It lies within the attractive Scouthead area of the Tame Valley. A public footpath adjoins the site and climbs up the steeply wooded cliff behind it linking the valley with the moors to the west. Because of these factors I support the Council's objective of improving the appearance of the area and protecting it from significant built development which would have a negative impact on the appearance of the locality. Having reached this conclusion it seems to me that in order to protect and enhance the character and appearance of the area it is necessary to allocate the site as protected green space rather than leave it unallocated.

3.21.10 The land is currently in use for industrial purposes and the allocation as protected open space under policy OL4 means that development cannot take place if it would prejudice the essential function of maintaining open land or providing a link with wider areas of countryside. However the reasoned justification recognises that some sites contain development. It goes on to say that existing uses are not under threat and that small scale extensions may be acceptable. Designation as protected open space whilst it would limit expansion, would not therefore preclude continued industrial use.

3.21.11 Given these factors I consider the allocation as protected open space to be appropriate in the light of the site's location and the Council's long term aspirations for the locality. I appreciate the Council's assertion that it now has the wherewithal to realise its aspirations through the Single Regeneration Budget programme (SRB6) has not so far proved successful. But from the, albeit limited information I have seen, the problem seems to be one of finance rather than principle.

Recommendation

3.21.12 I recommend no modification to the plan as a result of this objection.

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Andrew Goddard	324	264	O	
OBJ NO	SUMMARY OF OBJECTION			
264	The garden of Buckton Grange should be taken out of Green Belt and zoned as residential.			

Main Issue

3.21.13 Whether the garden at Buckton Grange should be allocated for housing purposes.

Conclusions

3.21.14 The objection site is in the green belt. National policy guidance in PPG2 says that only in exceptional circumstances should green belt boundaries be revised. In this particular location the green belt is important in fulfilling the functions of checking the spread of the built up area, safeguarding the countryside and assisting urban regeneration by encouraging the recycling of urban land. Whilst I appreciate the site is relatively small with an area of about 0.5 ha, its development would nevertheless compromise those objectives.

3.21.15 There is no evidence to suggest that the site needs to be allocated for residential purposes to meet the housing requirement either in qualitative or quantitative terms.

3.21.16 The exceptional circumstances put forward by the objector include his personal circumstances. Whilst I do not doubt his sincerity and can appreciate that finance generated by the housing allocation would enable him to continue restoration work at

the Grange, such matters are not sufficient to justify an alteration of the green belt boundary. Personal circumstances can change and could be pleaded at numerous other sites within the green belt.

3.21.17 Nor do I find the improvement in the appearance of untidy/unsightly land to be a persuasive argument. PPG2 is quite clear that once established green belt boundaries should not be altered or development allowed even if the land has become derelict. The location of the site within a conservation area does not weigh significantly against this view, particularly as in the present case the undeveloped, wooded nature of the land makes it an intrinsic part of the wider open countryside, despite it once being a semi-formal landscaped garden.

3.21.18 I have looked at all the other matters put forward by the objector but nevertheless conclude that none of the reasons are so exceptional as to justify the alteration of the green belt boundary and the allocation of the land for housing purposes.

Recommendation

3.21.19 I recommend no modification to the plan as a result of this objection.

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
H M Prison Service	359	494	O	
OBJ NO	SUMMARY OF OBJECTION			
494	The plan should include a policy/allocation to identify a site for a new prison.			

Main Issue

3.21.20 Whether the plan should include a policy/allocation to identify a site for a new prison.

Conclusions

3.21.21 The Council was not aware until the draft deposit stage of the plan that Tameside was within an area of strategic importance for additional prison places. Given the relative short time between the end of the draft deposit period and the revised deposit consultation, I can understand the Council's inability to identify a suitable site for a new prison within that time scale.

3.21.22 In addition, from the information before me it is not clear if a prison within Tameside will be required within the plan period. The original objection in the summer of 2001 referred to the Greater Manchester area in general as being an area of strategic importance for additional places, while the further statement by the objector in September 2002 refers only to the Borough being *well located strategically.....to serve the higher priority areas*. Despite the objection to the UDP there does not appear to have been any discussions between the parties about future provision in Greater Manchester in general or Tameside in particular

3.21.23 Although Circular 3/98 refers to criteria that may be used in the selection of prison sites, it also recognises that they are ideal criteria and that no one site is likely to satisfy them all. Given this factor I consider it would be extremely difficult for the Council to devise a realistic criteria based policy to test any potential development against.

3.21.24 In the event that there is a problem with timing of a UDP review and no allocation for a prison, Circular 3/98 recognises that such proposals may need to be treated as a departure from the development plan in the usual way. Therefore I see no reason why

the lack of a suitable policy in the UDP should necessarily inhibit the development of a new prison, if a site is identified in Tameside in the future. Discussions with the Council can always take place outside of the development plan process.

3.21.25 It follows from this that I conclude there should be no modification to the plan as a result of this objection.

Recommendation

3.21.26 I recommend no modification to the plan as result of this objection.

NAME OF ORGANISATION OR INDIVIDUAL		OBJ'R	OBJ NO	O or S	C WDR
R H Kennedy Properties		630	172	O	
OBJ NO	SUMMARY OF OBJECTION				
172	Land off Downing Close and Manor Farm Close, Ashton should not be included in green belt and open space zonings.				

Main Issue

3.21.27 Whether the objection site should be allocated as green belt and protected open space.

Conclusions

3.21.28 The objector is in dispute with the Council about whether the objection site has the benefit of a valid planning permission for housing. It is not within my remit to make a decision on that part of the objection. The resolution of the dispute is a matter for planning law and not the development plan process. I note at the outset that the allocation of the site as either green belt or protected open space would not negate the validity of a planning permission should it be determined that there is an extant permission on the site. However this matter, whilst unresolved, can carry little weight in my examination of the allocations on the site.

3.21.29 The bulk of the objection site is designated protected green space with only a sliver of land being within the green belt. There are no physical features on site to mark the boundary between the two. Whilst regional planning guidance is clear that a strategic review of the green belt is not necessary before 2011, I note that PPG2 says that green belt boundaries should follow easily recognisable features. Such is not the case here. However in practical terms whether green belt or open land policies are applicable, the objective is to keep the land open. In practice this lack of definition makes little difference.

3.21.30 There is though a clear boundary between the built up area and the open land which includes the objection site. Downing Close and Manor Farm Close properties delineate the residential area. The difference between open and developed land is also emphasised by the change in levels. The open land, particularly at the end of Manor Farm Close, is at a lower level than the built up area. The open area is generally wooded and crossed by a number of footpaths. It has the appearance of informal recreational space and forms a part of the wider area of the Medlock Valley. As such it fulfils purposes of both the green belt and protected green space.

3.21.31 I appreciate that PPG3 is permissive in principle of urban extensions, but that is only when there is a lack of sites within the urban area. Such is not the case in this instance. Additional sites are not necessary to meet the housing requirement. I have also looked at the 2 appeals for housing development in 1982 and 2000, but I do not consider they support the removal of the objection site from the green belt/protected open space

designations. The former site was allocated for housing purposes at the time that appeal was decided and the latter was determined in, what the inspector considered to be, accord with the adopted UDP.

3.21.32 Overall these factors lead me to conclude that the objection site should remain green belt and protected green space.

Recommendation

3.21.33 I recommend no modification to the plan as a result of this objection.

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Sandra Ray	640	530	O	
OBJ NO	SUMMARY OF OBJECTION			
530	A separate section on all aspects of childcare should be incorporated into the plan.			

Main Issue

3.21.34 Whether the UDP should include a section on childcare

Conclusions

3.21.35 National policy guidance in PPG12 says that development plans should relate directly to land use planning, should not be too lengthy and should not be too detailed.

3.21.36 Many of the aspects raised by the objector such as the number of children accommodated in nurseries and access for special needs children are more properly the concern of other legislation. Whilst in theory it would be possible to devise a criteria based policy to test applications for childcare facilities against, in practice given the wide range of size and type of facility it would be problematical to apply such a policy in a meaningful way. Especially if the purpose was seen to limit the size of such facilities in an arbitrary way, when current legislation controlling the provision of these facilities has no limits on the maximum number of children. In my view it would be more appropriate for such applications to be treated on their merits against existing general policies in the UDP such as E5 and E6.

3.21.37 Given these circumstances I conclude that it is unnecessary to include either a section or a policy on childcare facilities in the UDP.

Recommendation

3.21.38 I recommend no modification to the UDP as a result of this objection.

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Redrow Homes (North West) Ltd	643	523	O	
OBJ NO	SUMMARY OF OBJECTION			
523	Land north of Mottram Old Road and west of Green Lane, Hyde should be allocated for housing development			

Main Issue

3.21.39 Whether the site should be deleted from the green belt and allocated for housing purposes.

Conclusions

- 3.21.40 In the light of my conclusions under policy H1 above, I do not believe there is, at the present time, any need to identify, in terms of either quantity or quality, additional land to meet the housing requirement set out in emerging RPG13. In any event the search sequence for residential land in PPG3 is to give priority to the re-use of previously developed land in the urban areas identified in urban capacity studies. I consider the objection site which is greenfield land outside the urban area to be very low in terms of suitability for development when measured against these criteria.
- 3.21.41 My view is reinforced by the location of the site within the green belt. The site is predominantly open and contains the south east boundary of Hyde. It fulfils the essential purposes of the green belt in that it checks urban sprawl, assists in safeguarding the countryside from encroachment and assists in promoting urban regeneration. PPG2 is quite clear that changes to the green belt boundary should only be changed in exceptional circumstances. The draft RPG has concluded that there is no need for a strategic review of the green belt boundary before 2011.
- 3.21.42 In the light of the above considerations it seems to me that there are no exceptional circumstances which would justify the deletion of the site from the green belt. This leads me to the conclusion that the site should remain in the green belt and not be allocated for housing purposes.

Recommendation

- 3.21.43 I recommend no modification to the plan as a result of this objection.**

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Roland Bardsley Homes	658	28	O	
OBJ NO	SUMMARY OF OBJECTION			
28	There is conflict between references to affordable housing in the overview of the Borough in part 1 and later statements. Clarification as to the meaning of housing stock is required.			

Main Issue

- 3.21.44 Whether any changes are needed in order for the position on affordable housing to be clarified.

Conclusions

- 3.21.45 The objection was made to the draft deposit version of the plan which was amended at the revised deposit stage. In part 1 of the plan - the Housing and Regeneration section of the Overview of the Borough - reference to social and affordable housing has been deleted and replaced with *In social and rented housing attention is increasingly being given to removing difficult to let properties and making the stock more suitable for current requirements, rather than increasing overall supply.* The Council say that current social housing initiatives involve building new properties and refurbishing existing ones to meet the needs of those in need of affordable housing, together with the demolition of unsuitable/unfit properties. The housing stock therefore includes existing and proposed units.
- 3.21.46 The objector refers to later statements in the plan. With a lack of information to the contrary, I have assumed these references refer to policy H4 which deals specifically with the affordability of housing. As can be seen from my conclusions on that policy,

its reasoned justification is now somewhat out of date given the outcome of the Housing Demand and Needs Survey.

- 3.21.47 One of my recommendations in respect of that policy is that the text accompanying the policy be modified to include an explanation of the consequences of the results of the Housing Demand and Needs Survey on the Council's application of policy H4. In this I would expect affordable housing to be properly defined to distinguish between the different types and also for the need for changes to the social rented housing stock and other affordable housing to be fully explained. To my mind this will clarify the situation satisfactorily without further amendment.

Recommendation

- 3.21.48 I recommend no further modification to the plan as a result of this objection.

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Roland Bardsley Homes	658	32	O	
OBJ NO	SUMMARY OF OBJECTION			
32	The plan should show all committed housing sites which have not yet started.			

Main Issue

- 3.21.49 Whether committed housing sites should be shown on the proposals map.

Conclusions

- 3.21.50 Table 3 under policy H1 lists all sites with planning permission for housing where construction had not begun by mid 2001. It includes the objector's site at Queens Road Ashton.
- 3.21.51 Government advice on showing committed housing sites on the proposals map is not prescriptive. Annex A to PPG12 says that the map should illustrate each of the detailed policies and proposals in the written statement and define sites for land uses. Development Plans – A Good Practice Guide goes on to add that sites with planning permission and where development has begun or is expected to begin can be shown on the base map if it is relevant to the plans proposals.
- 3.21.52 In this case the Council say they have been mindful of Government advice which says that development plans should concentrate on new proposals and avoid any unnecessary detail. They have consequently opted for a simpler version of the plan excluding such information. In tables accompanying policy H1 of the plan the Council set out information on dwellings under construction and sites with planning permission where development has not commenced. The information is therefore available within the UDP, although not on the plan.
- 3.21.53 The objector does not say why the proposals map should include such information and as it is already provided in written form I see no reason why it should be duplicated on the proposals map. It follows that I do not consider it necessary to modify the proposal map in the manner suggested.

Recommendation

- 3.21.54 I recommend no modification to the plan as a result of this objection.

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Cllr Sidebottom, on behalf of Ashton St Michael's Ward Councillors	693	562	O	
OBJ NO	SUMMARY OF OBJECTION			
562	Half the site of Hurst Infants School, Ashton should be retained for building a "Sure Start" centre.			

Conclusions

3.21.55 Events have overtaken this objection. Planning permission has been granted for the whole of the objection site for residential development and a Sure Start centre has been approved on the former army pay office on Rose Hill Road (housing allocation H1.9). From a practical point of view it would serve little purpose to comment further on this objection.

Recommendation

3.21.56 I recommend no modification to the plan as a result of this objection.

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Trustees of Mrs E Bissill's Fund & Stayley Developments Ltd	807	85	O	
OBJ NO	SUMMARY OF OBJECTION			
85	Land at Sidebottom Fold, Stalybridge should be allocated as a reserve housing site.			

Main Issue

3.21.57 Whether the site should be deleted from the green belt.

Conclusions

3.21.58 The UDP does not identify reserve housing sites. Whilst PPG2 does say that it may be necessary to identify safeguarded land between the urban area and the green belt to meet longer term development needs, it also says that regional guidance should provide the strategic framework for considering this issue. The emerging RPG has concluded that there is no need for a strategic review of green belt boundaries before 2011. Therefore for Tameside to do so on an ad hoc basis would be contrary to strategic advice. What the UDP does do, is allocate phase 2 greenfield sites which may come forward after 2006, but only if there is an inadequate supply of land available through outstanding commitments and remaining allocated brownfield sites. I have therefore looked at this objection as a request for the land to be allocated as a phase 2 site.

3.21.59 My conclusions under policy H1 above make it clear that I do not believe there is, at the present time, any need to identify, in terms of either quantity or quality, additional land to meet the housing requirement set out in RPG13. In any event given the search sequence for residential land in PPG3, that is giving priority to the re-use of previously developed land in the urban areas identified in the urban capacity study, I consider the objection site which is greenfield land outside the urban area ranks very low in terms of suitability for development.

3.21.60 My view is reinforced by the location of the site within the green belt. The site is predominantly open and contains the western limits of Stalybridge. It fulfils the essential purposes of the green belt in that it checks urban sprawl, assists in safeguarding the countryside from encroachment and assists in promoting urban regeneration. PPG2 is quite clear that the green belt boundary should only be changed

in exceptional circumstances. In my opinion no exceptional circumstances have been identified.

3.21.61 In the light of the above considerations it seems to me that there is no justification for the deletion of the site from the green belt.

Recommendation

3.21.62 I recommend no modification to the plan as a result of this objection.

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
Trustees of Mrs E Bissill's Fund & Stayley Developments Ltd	807	86	O	
OBJ NO	SUMMARY OF OBJECTION			
86	Land at Matley Lane, Stalybridge should be allocated as a reserve housing site.			

Main Issue

3.21.63 Whether the site should be allocated for housing purposes.

Conclusions

3.21.64 Essentially my conclusions to this objection are the same as to objection 85 above (land at Sidebottom Fold, Stalybridge). The allocation of part of the site as protected green space does not fundamentally change my conclusions. Moreover an added reason is that the green belt at the Matley Lane site also serves the purpose of preventing towns from coalescing. The open land between Stalybridge and Hyde is very narrow at this point.

3.21.65 I also note in relation to both objections that a combined site area of about 50 ha would at 30 dwellings per ha be likely to yield about 1500 dwellings. Even allowing 20% for slippage this would result in almost 20% of the housing land supply identified for the whole plan period at the draft deposit stage. It is difficult to envisage such a substantial shortfall occurring.

Recommendation

3.21.66 I recommend no modification to the plan as a result of this objection.

NAME OF ORGANISATION OR INDIVIDUAL	OBJ'R	OBJ NO	O or S	C WDR
W I S H Properties	825	442	O	
OBJ NO	SUMMARY OF OBJECTION			
442	Disused, poorly defined land at Miller Hey, Mossley should be excluded from the green belt.			

3.21.67 I deal with this objection fully in the Countryside, Open Land, Sport and Recreation Chapter at policy OL2 paragraphs 5.2.3-5.2.6 below and repeat here only my recommendation in respect of the objection.

Recommendation

3.21.68 I recommend no modification to the plan as a result of this objection.