

Tameside Metropolitan Borough Council (TMBC)
Planning Policy Team
Tameside One
PO Box 304
Ashton under Lyne
OL6 0GA

Ref: 101-002
Email: planpolicy@tameside.gov.uk

30 May 2025

To whom it may concern,

Homes, Spaces, Places Part 2 Local Plan Consultation

New-Era Properties Representation

We write on behalf of our client, New-Era Properties, in response to the current consultation on *Homes, Spaces, Places* Tameside's Draft Part 2 Local Plan, which sets out the long-term spatial strategy for the Borough to 2042.

New-Era Properties (NEP) is a major landowner in Droylsden and has an ongoing, vested interest in the future success of the town. Our client has previously made formal representations to the Council in respect of the Droylsden Masterplan consultation in October 2024 (attached at **Appendix 1** which includes further background and context to NEP's interest) and is now pleased to make a further contribution to this stage of Local Plan preparation.

Overall, NEP supports the Council's ambition to prepare a robust and forward-thinking Plan which promotes sustainable regeneration and resilient communities. However, as drafted, the Plan fails to fully recognise the potential for growth in Droylsden which is a missed opportunity, and so not justified or effective in terms of paragraph 36 of the National Planning Policy Framework (NPPF).

It is important for the Council to engage in further dialogue to establish how the Plan will be implemented in a way that supports delivery and growth in Droylsden, to help ensure a future vibrant and diverse centre, with a broader mix and scale of retail, residential, commercial and leisure uses are supported, and where NEP has a key role to play working in closer partnership with the council.

We provide comments below on the sections of the proposed Plan.

Summary

NEP agrees with the Council's objective of delivering vibrant, inclusive and sustainable places. However, we do not believe that the current draft meets the NPPF's tests of soundness set out in paragraph 36, particularly regarding justification and effectiveness. These include:

- The Plan does not sufficiently reflect the strategic regeneration potential of Droylsden or capitalise on existing private sector interest and landholdings
- There is a lack of clarification over Droylsden's role within the spatial hierarchy and its designation within the town centre network; and
- The Plan underplays existing opportunities and constraints in Droylsden, particularly the strategic potential of brownfield assets and the legal and practical status of the Concord Building.

We do not consider that the current draft offers a sufficiently positive or deliverable spatial framework for Droylsden, contrary to paragraph 15 of the NPPF, and it does not capitalise on the potential for inward investment and regeneration already available through committed private stakeholders such as NEP.

Section 2 - Spatial Portrait

The draft Plan refers to Droylsden as both a *"main town centre"* (for example at paragraph 2.39 of the Options and Preferences document) and as a District Centre elsewhere, including on the Spatial Portrait Plan (figure 2). Historically, Droylsden functioned as an independent civic and commercial town centre, and it still retains many of the spatial and built form characteristics of a town. Over time, the town has declined including due to factors such as increased competition with out-of-centre retail, the specific blight on the town centre due to the unresolved future of its former Town Hall (The Concord Building) and strategic infrastructure (e.g., M60), and its role today is as a District Centre.

However, its location on the Metrolink network and within the M60 ring road and adjacent to the ongoing regeneration at East Manchester and close to the City Centre, are important characteristics and opportunities for Droylsden to accommodate more significant regeneration and growth over the Plan period, such that it could be defined as more of a Large District Centre or Town Centre in the future, if the vision is realised.

Section 3 and 4 - Spatial Vision and Objectives

NEP supports the general vision set out in Section 3 and 4 of the Options and Preferences document in line with Places for Everyone (PfE), and agrees that Tameside

should aim to deliver inclusive, resilient and attractive places. However, we consider the draft Local Plan is not currently effective in realising these objectives in Droylsden. For example, no clear delivery mechanisms or policy commitments are in place to support the regeneration of the Concord Building or surrounding sites.

Paragraph 16 of the NPPF requires that plans contain clear and unambiguous policies. At present, the draft Plan does not provide sufficient clarity on how key regeneration locations, such as Droylsden, will be delivered in practice.

Section 5 - Spatial Framework

The draft Plan sets out the Places for Everyone overall spatial strategy, noting that Tameside falls within the objective of *'boosting northern competitiveness'*. We note that the strategy has no fixed boundaries and consider that the scope and potential for sustainable development at Droylsden aligns more closely with the 'inner area regeneration' that is ongoing around the city core.

In these terms, the Plan does not recognise the extent of the potential for regeneration in and around Droylsden that is critical for it to become a more diverse and vibrant centre that helps contribute more significantly to meeting the council's housing, employment and other commercial needs.

We note and support paragraph 5.32, which identifies that *'the borough's centres are expected to be locations where large proportions of new housing are expected to be directed to'*.

Droylsden centre clearly has good potential to deliver high density residential development as a part of a diverse mix of uses over the Plan period. However, paragraph 5.32 should add that Droylsden also has multiple opportunities (along with Ashton-under-Lyne and Stalybridge).

The Plan should also more clearly identify and support where Droylsden sits in terms of the growth priorities in Policy HSP S2. Droylsden centre is *included* in the Eastern Growth Cluster as Growth Priority 1a in policy HSP S2, but this is not clear from the policy, which also lists Droylsden as one of the Neighbourhood areas within the same policy.

Droylsden's location adjacent to the M60 and the Etihad Corridor positions it within Greater Manchester's Eastern Growth Cluster, as recognised in GMCA's spatial vision. However, the Local Plan fails to reflect this status in its site prioritisation, allocations or delivery mechanisms.

To be justified under the NPPF, the Plan must take account of all reasonable alternatives. The spatial strategy does not sufficiently explore the regeneration potential of Droylsden as a growth location, which is a missed opportunity and not justified.

Section 6 - Centres

Paragraph 6.2 correctly lists Droylsden as one of Tameside's main town centres, '*...crucial components to the economic, environmental and social success and wellbeing of the borough*'. Paragraph 6.3 recognises that towns have faced challenges and must adapt, but retail remains a key component within Droylsden, and NEP has been investing in its shops, seeking to attract a food store anchor to the centre to help underpin and act as a catalyst for further investment.

It is critical that the council continues to support NEP in this endeavour to protect Droylsden centre and focus retail interest within the designated centre through Policy HSP C1.

Policy HSP C1 – Town Centre Network

While NEP supports the intention to promote resilient and diverse centres, the draft policies do not sufficiently support delivery in Droylsden. We do not believe the Plan provides an effective strategy to address current retail vacancy and land utilisation, nor does it reflect the available opportunities within NEP's landholdings.

The situation is complicated by NEP's ongoing engagement with the Council around the future of the Council owner Concord Building, the redevelopment and repurposing of which it sees as a critical component and beacon for the future regeneration of the town, but which has been entirely neglected by the Council with no deliverable plan apparent.

Droylsden should be clearly supported for mixed-use regeneration, including residential, commercial and community uses. We request stronger policy language that identifies Droylsden as a location and main priority for growth and confirms the Council's commitment to delivering growth.

Policy HSP C2 – Primary Shopping Areas

We support the introduction of a defined primary shopping area in Droylsden, and it should help resist inappropriate out of centre proposals (such as the previous proposal by Aldi at Snipe Retail Park and the current proposal by Lidl at The Pearl) which could readily be accommodated within Droylsden centre.

However, Droylsden's primary shopping area also has significant potential for other uses including high density residential apartments, hotel, leisure and other commercial uses and NEP is keen to engage with the council to develop and bring forward these wider uses as quickly as possible to help regenerate the town.

The policy-led approach should prioritise food and comparison retail in town centre locations to support footfall, co-location of services, and linked trips. This approach should also promote a broader mix of complementary uses, such as medical and dental facilities, which could benefit from the town centre's excellent transport links and parking provision. Such diversification would enhance the centre's role in meeting the varied needs of residents and contribute to its long-term vitality.

Policy HSP C4 – Thresholds and Impact Assessments

We support the proposed threshold for retail impact assessments in Droylsden. However, this policy will only be effective if supported by a robust strategy for bringing key town centre sites forward, including opportunities for a new food retail anchor to the suitable and available site within Droylsden centre.

Section 7 - Environment

NEP supports improvements to the public realm where these are appropriately scoped, well-maintained and deliverable. However, the Droylsden Masterplan and associated policy ambitions within the draft Plan envisage large new areas of public space, which are not viably located, not costed or resourced and may place further pressure on local maintenance budgets.

The Local Plan includes several ambitions relating to the public realm. We support these in principle but recommend a shift toward a '*quality over quantity*' approach, with a focus on deliverable, small-scale interventions such as improved pedestrian connectivity, signage and landscape upgrades. The creation of large-scale new public spaces in Droylsden must be properly costed and phased to avoid maintenance burdens or viability risks. Better connections and improvements to the Town's existing parks and green spaces should be prioritised. The Town already has five substantial parks within 750m of the town centre, together with other amenity areas such as the marina, where improvements would return huge benefits for the community.

Section 8 -Homes

We support the inclusion of town centre housing as part of the Council's regeneration ambitions, and particularly the reference to Policy HSP H1 to support diverse residential typologies.

Future iterations of the Plan should include more explicit support for town-centre housing in Droylsden as a means of bolstering footfall, supporting local services, and ensuring a more active centre throughout the day and evening. NEP is actively exploring such opportunities within its landholdings and would be keen to have engagement with the Council regarding this.

Section 9 - Jobs

NEP invested in Droylsden centre in 2018 shortly before the covid pandemic. Despite this, there has been a noticeable increase in job opportunities within the centre as a result of the ongoing investment and the imminent arrival of new operators in the town.

NEP is currently seeking to attract a new retail anchor to the available unit within the primary shopping area that would act as a catalyst for wider regeneration and economic activity. This would not only support Policy HSP J1 but also expand the opportunities for Policy HSP J2.

NEP is keen to engage in positive and meaningful dialogue with the Council to explore how these objectives can be delivered together, and requests that the Local Plan provides clear and flexible support for town-centre commercial development, including smaller-scale employment and retail provision in centres such as Droylsden.

Section 11 - Travel

Droylsden is one of the most accessible locations in the borough, located directly on the Manchester Metrolink network and adjacent to the M60 orbital. It benefits from established public transport services and a walkable town centre structure. These locational advantages should be more clearly articulated in the Plan to support sustainable development and reinforce the case for town-centre intensification. Although Droylsden is served by Fairfield rail station to the South, the opportunity to reopen the former Droylsden Station to the North of the town centre should be identified as opportunity to further increase the sustainable connectivity of the town.

Section 12 - Places

The Council does not yet have any viable plan for the Concord Building. This civic building is a prominent non-designated heritage asset with considerable embodied carbon and community value. The building plays a significant central role in Droylsden constructed in the early 1970s, with its name derived from Droylsden's motto "*Concordia*", meaning harmony.

The Council is under a legal obligation to NEP to maintain the exterior of the Concord Building that has not been fulfilled. The building is structurally sound and capable of

accommodating a range of viable reuses, including workspace, residential, community or cultural uses. We strongly advocate for a 'Refit First' approach, aligned with the NPPF (paragraph 164), climate resilience and circular economy principles.

We therefore request that the Plan include specific requirements for a viable and substantiated plan for the immediate redevelopment of the Concord Building.

Delivery and engagement

NEP has been seeking meaningful engagement with the Council following the Masterplan consultation and has serious concerns about its delivery in many respects. This potentially undermines the deliverability of key town centre interventions and we respectfully suggest that the Council establish a delivery forum or similar mechanism to support implementation of the Plan through collaboration with key landowners and stakeholders.

Conclusion

NEP welcomes the opportunity to formally participate in the preparation of *Homes, Spaces, Places* and wishes to be kept informed of the Plan's progress. We respectfully request that our representations be fully considered, and we reserve our position to comment more fully on future stages of consultation and site allocation work. We would also welcome a meeting with Officers to discuss NEP's contribution to the Plan's objectives in more detail.

Please confirm receipt of this representation and ensure we are notified of future stages of Local Plan preparation.

Yours faithfully,

Sophie Stanton

Planner

Email: [REDACTED]

Enc: Representation to Droylsden Masterplan

Cc: New-Era Properties

Appendix 1 – Droylsden Masterplan Consultation Response – NEP Representation

Tameside Metropolitan Borough Council (TMBC)
Tameside One
PO BOX 317,
Ashton under Lyne,
OL6 0GS

Ref: 101-002
Email: planningmail@tameside.gov.uk

18 October 2024

To whom it may concern,

Droylsden Masterplan Consultation Response

We act for New-Era Properties, a major stakeholder and landowner in Droylsden, and write with some comments on the consultation draft of the Droylsden Masterplan.

New-Era's objective is to ensure the Droylsden Masterplan is deliverable and supports a range of alternative future land uses to help meet future needs within the town centre and an appropriate density of development for this sustainable location.

Overall, New-Era is very supportive of the Droylsden Masterplan and has provided input to earlier iterations. We are keen, however, to ensure that the plan helps drive forward investment in the town as soon as possible and, to this extent, we are not clear of its intended status - is the Masterplan proposed to be adopted as a Supplementary Planning Document or is it more informal guidance, and what weight will it be given in future planning decisions?

New-Era is seeking to bring forward significant change in Droylsden, but this requires working in partnership with the council and other stakeholders. As set out in our more focussed comments below, we are keen to help facilitate positive change and look forward to working more closely with the council to set out how this can be achieved.

New-Era Properties

New-Era Properties purchased the Droylsden and Greenside Lane shopping Centres in Droylsden in 2018. Their interest comprises, with only a few exceptions, the area of the town centre bounded by Manchester Road, Market Street, Greenside Lane and the rear of properties to Shelley Grove & Tesco. A plan is attached with a red line indicating New-Era's interest.

New-Era believes that to create and sustain a vibrant town centre, that centre must be fully integrated with the surrounding areas and in the hope of promoting that ethos to TMBC, has prepared, shared and discussed their '*vision*' for New-Era's property and the wider town. Those discussions with TMBC were instrumental in encouraging the council to undertake the masterplanning exercise now coming to fruition.

Concord Suite – Proposed Key Project Board 7

The early and successful re-purposing and development of the Concord Suite is pivotal to the success of the Masterplan. It is an iconic, landmark building at the centre of Droylsden albeit currently seen as a symbolic of civic neglect. New-Era supports and wants to work with the council on a sustainable proposal to ensure its retention and early transformation.

We note that the Masterplan suggests a number of partial or full demolition options to '*make way for new modern development,*' but New-Era considers this would not be justifiable or desirable.

The Concord Building is an important part of Droylsden's history. It is a significant building which is architecturally appreciated throughout a wide area. It has a great deal of embodied carbon and should therefore be subject to a '*re-fit first*' ambition. The space within the building is good, clear space readily adaptable to new uses. The building offers significant potential to return as a positive contributor to the town and to do so without disruption to the ongoing businesses in the town.

Pedestrian Links - Proposed Key Project Boards 3 & 4

The early delivery of pedestrian links across the town is vital to establish easy access to and around the town. There is already a lot of new housing being brought forward around the town and it is important easy links are created now to encourage town centre visits on foot.

New-Era has previously shared its thoughts on the most obvious '*missing links*' and attached is a CGI of the consented scheme to provide a safer link to St Mary's. Other potential links include:

- Access to Scott Road estate
- Manchester Road tunnel
- Marina to Fairfield Road
- Ashton Hill Lane to Market Street
- N-S & E-W routes across the town's central car park
- Edward Street to Marina

Though a number of these routes are picked up within some of the Masterplan's Key Projects, we believe the '*simple*' links would be more important and deliverable more quickly than the larger projects within which they are subsumed.

Public Realm - Proposed Key Project Boards 3, 4 & 5

New-Era supports the revitalisation of the public realm around the town, especially the aspiration to provide a better sense of enclosure around the Villemomble and Market Street Squares which provide the setting for the Concord Building.

The idea behind Droylsden Square is understood but the town centre already has a central square which could deliver a multi-use space without the loss of the car parking which is vital to the viability of any events that might be staged. The successful monthly makers market operates well and safely on the Clock Tower Square and brings beneficial footfall into the town centre.

The proposals for Hollingwood Park are less understood and New-Era believes could be detrimental to the town if indeed deliverable at all. The key project within Hollingworth Park with easily appreciable value to the town is the Northern end of the pedestrian route beneath Manchester Road.

Not mentioned in the Masterplan is the already substantial investment made in developing the town's marina. The water element already delivered is exemplary but so far, the early phases of the surrounding housing has failed to fully capitalise on the adjacent infrastructure. A '*Key Project*' should be an area of public realm around the basin that should define the remaining development land available.

New-Era has looked at how the marina could deliver an architecturally exemplar housing development while also providing public realm that would link the Moravian Settlement through the marina and across Manchester Road to the Concord Suite. A CGI is attached.

Deliverability

It is vital that this Masterplan is a plan to bring forward rapid recovery for the town but that also delivers long term viability.

New-Era is keen to hear how Tameside will ensure this plan is optimised and implemented. While New-Era can appreciate the creativity and ambition of the proposals, there should be an appreciation of the benefit small-scale interventions can deliver and, while these should not frustrate grander ambitions, neither should grander ambitions frustrate short term gains.

Hollingwood Square and Droylsden Square envisage large additional areas of expensive council maintained public realm at a time when resources are tight and existing public realm is struggling to be maintained. Quantity should not override quality and New-Era would like to discuss with TMBC the appropriate distribution and extent of retail and other associated uses across the town.

New Era's Ideas

There is a need to introduce a wider mix of uses (and likely reduce retail content) to drive activity throughout the day and evening but, as drafted, the masterplan appears to increase '*frontage*' without delivering significant housing within the town centre that might help sustain the existing retail provision.

New-Era would like the evolution of the Masterplan to be open to all appropriate uses for a town centre location, including residential, retail and employment. Town centres should be the focus for services, especially given the excellent transport links and so all such uses would accord with national and local adopted planning policies.

New-Era has already obtained positive pre-application advice on proposals to bring substantial residential into the town centre and trust this support will be endorsed as an aspiration within the Masterplan.

Next steps

New-Era would like to engage in further discussion with TMBC to formalise their plans for redevelopment in Droylsden.

Many of the '*Key Projects*' proposed are to some extent reliant on New-Era's involvement and, while they do not seek to limit aspiration, New-Era is keen that all the proposals promoted through the Masterplan should be viable and deliverable.

Given the broad alignment of the draft plan with New-Era's own '*Vision*', New-Era proposes to continue to develop its detailed proposals and will discuss with TMBC the approach to be taken with application(s) for initial stages of development and options around outline / detailed applications.

Conclusion

There is a significant opportunity for this Masterplan to help guide and deliver positive placemaking across Droylsden and the key to delivering this positive change is to work in closer partnership across the private and public sectors. Integral to this is the importance of working productively and at the earliest opportunity to unlock the Concord Suite.

New-Era has been investing steadily and supporting existing land uses and is keen to progress with planning applications for more substantive redevelopment across a wider spread of land uses appropriate for a town centre location and looks forward to discussing these with the council to help continue to revive Droylsden.

Yours sincerely,



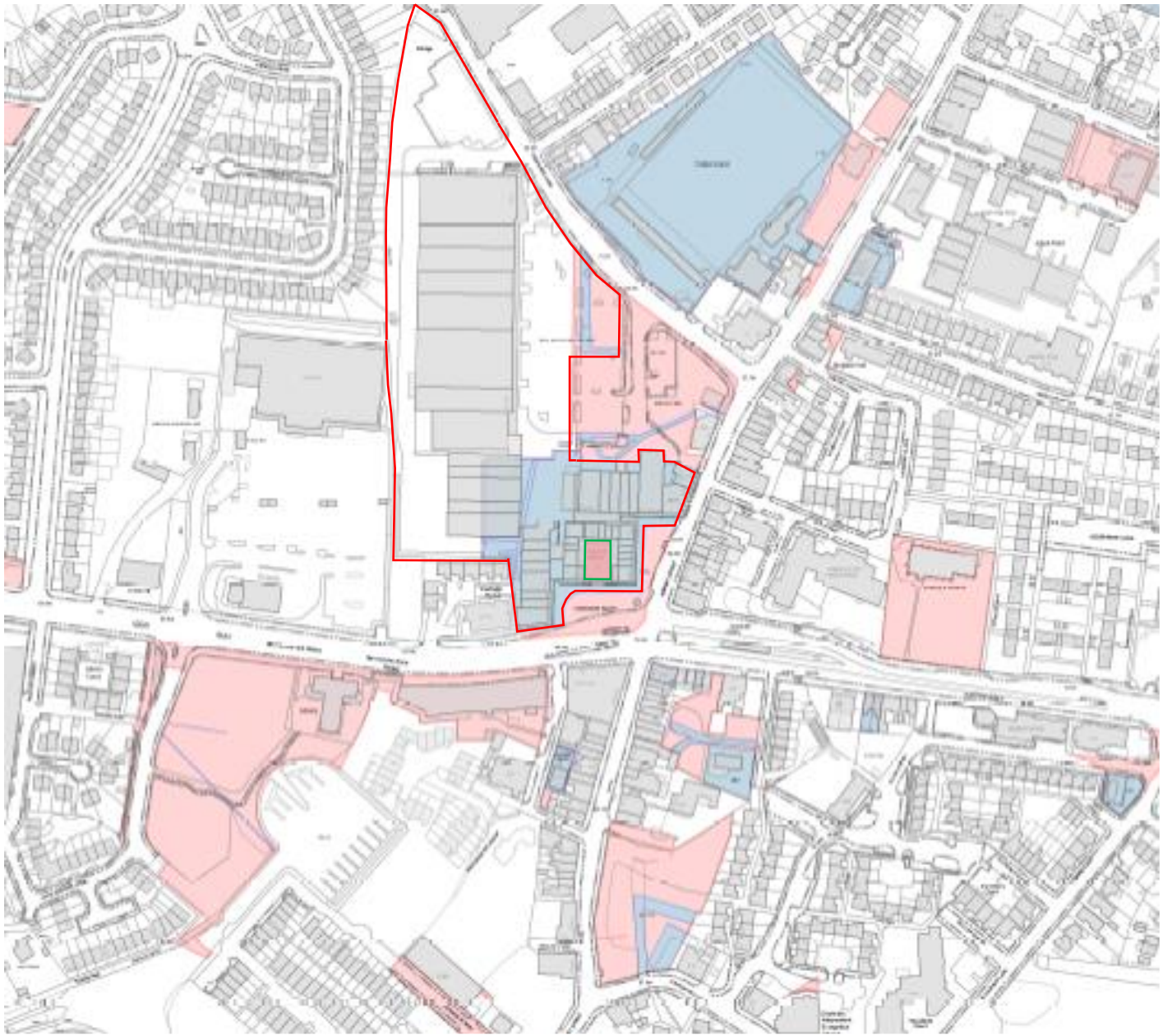
Sophie Stanton

MRTPI MSC BA(HONS)

Planner

Email:







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