



Tameside Local Plan Consultation

Response to Homes, Spaces, Places Options and Preferences Consultation Draft

Submission in relation to:

[Land to the east of Lees Road, Ashton-under-Lyne](#)

On behalf of Richborough

June 2025

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1 INTRODUCTION

- 1.1 This submission has been prepared by Asteer Planning LLP (“Asteer”) on behalf of Richborough in response to the Tameside Council Homes, Spaces, Places Options and Preferences (“OPP”) Local Plan Consultation, running from the 14th April until 2nd June 2025.
- 1.2 The emerging Local Plan for Tameside provides a unique opportunity for the Borough to holistically plan for its strategic growth, including its housing and employment needs, and to capitalise on its intrinsic strengths over the next Plan Period and beyond, by planning for the type, quality, and scale of land that will meet identified needs, and support its economic and social growth over the next 25-30 years.
- 1.3 These representations provide Richborough’s response to the OPP consultation and seek to assist in informing the emerging Local Plan spatial strategy, strategic policies and land allocations, by demonstrating the potential of land to the east of Lees Road to support the needs of Tameside during the next Plan Period.

About Richborough

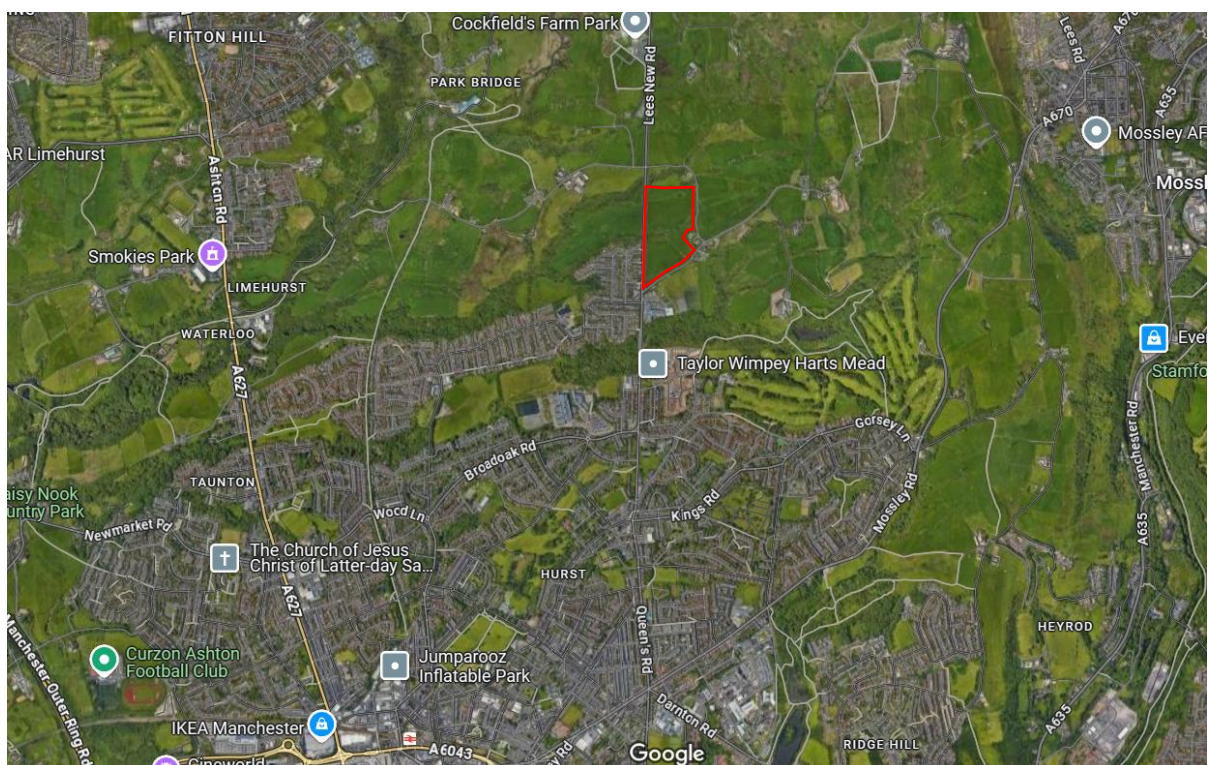
- 1.4 Richborough was founded in 2003 and is one of the UK’s most successful specialist land promotion business , supplying consented land to the property and construction industry to accelerate the delivery of new homes and jobs. It is a founding member of the Land, Planning and Development Federation (“LPDF”) and a member of both the British Property Federation (“BPF”) and Home Builders Federation (“HBF”). It interacts daily with Local Planning Authorities (“LPAs”), local stakeholders and statutory consultees.
- 1.5 Richborough works in partnership with private and public sector landowners to promote land via the planning system for residential, commercial and mixed-use development. It focuses heavily on place-making, local communities and complementing and enhancing existing infrastructure. The Richborough land promotion model incentivises all parties to seek an allocation in the emerging plan and ensure that, once outline planning permission is secured, the preferred development partner will commence construction and deliver schemes at the earliest opportunity. It has an extensive track record that can be viewed on its website.

1.6 Richborough has an agreement to promote the land at Lees Road, Ashton-under-Lyne on behalf of the landowner. It has already submitted representations through several rounds of consultation including the previous Homes, Spaces, Places Scoping Document, Integrated Assessment and Call for Sites in September 2024. Prior to this representations were submitted to the Tameside Local Plan Scoping Consultation in 2017 and subsequently through the Greater Manchester Spatial Framework (“GMSF”) and latterly, the Places for Everyone (“Pfe”) Plan.

Background and Context

1.7 The site measures approximately 9.2 hectares (“ha”) in size and is well contained open agricultural land. The site is bounded to the west by Lees Road, beyond which is the existing residential area of Ashton-under-Lyne, by Twirl Hill Road to the east and north, and by Lily Lanes to the south, beyond which is St Damian’s RC Science College. A Site Location Plan is included at Appendix 1.

Figure 1: Site Context Plan (illustrative purposes only)



1.8 The site represents a logical and appropriate extension to Ashton-under-Lyne, with the ability to provide a defensible northern boundary to the settlement. It is in a sustainable location, on the northern edge of Ashton-under-Lyne, with access to a range of existing

services and facilities. It provides an opportunity to make a positive contribution to Tameside's increasing housing requirements, including affordable homes, on a deliverable site, early in the Plan Period. The site can deliver development that meets the highest standards of sustainable design, while supporting significant enhancement to biodiversity and providing new open space and recreational opportunities which are accessible to the local community.

1.9 The remainder of this submission provides:

- **Comments on the Options and Preferences Draft Plan** – including the housing requirement, spatial strategy, and approach to land allocations (including Green Belt). This is in the context of:
 - The new NPPF, including the increased housing requirement for Tameside and new Green Belt / Grey Belt Policy;
 - The employment growth / potential of Tameside and the need for homes to support it;
 - The housing land supply and the gap between PfE allocations, existing claimed supply and the housing requirement; and
 - Any relevant documents from the Local Plan Evidence Base.
- **The Case for Allocation and Site Deliverability** – an assessment of why the site should be considered for development / allocation, based on the following:
 - A summary of the “exceptional circumstances” that exist for the Tameside Local Plan to review the Green Belt boundary;
 - A high level Grey Belt review;
 - A summary of the deliverability of the site – including a review of the technical and environmental considerations, and its availability, suitability and achievability.
- **Conclusions and Recommendations.**

- 1.10 Richborough would welcome ongoing engagement with the Council as the OPP Consultation responses are considered and the preparation of a new Local Plan is progressed. Richborough would be happy to discuss any feedback in relation to these representations, or in relation to the site individually.

2 COMMENTS ON THE OPTIONS AND PREFERENCES DRAFT PLAN

- 2.1 This section provides comments on the OPP draft plan, including the emerging spatial strategy, strategic policies and approach to land allocations (including Green Belt), as they relate to the national policy context.

National Context

- 2.2 On 12th December 2024, a new National Planning Policy Framework (“NPPF” or “the Framework”) was published, with immediate effect. This builds on the Government’s housebuilding and delivery manifesto pledges, and seeks to support the delivery of land and sites across the country.
- 2.3 The new NPPF includes significant changes with regards to housing delivery and the Green Belt. The key implications of relevance for Tameside and the site are as follows:

Housing Requirement

- 2.4 Tameside’s housing requirement has risen from 485 dwellings per annum (“dpa”) (in the adopted PfE Plan) to 1,124 dpa using the new standard method – an increase of 639 dwellings per year.
- 2.5 Tameside is currently required to deliver housing in line with the housing requirement figure set by the PfE (485 dpa), however, once this Plan becomes five years old (in March 2029), Tameside will be required to deliver sufficient housing to meet the latest Local Housing Need (“LHN”) figure (1,124 dpa). This will be a very significant increase in Tameside’s housing requirement of 132% that will need to be addressed in both decision taking and plan making. Working pro-actively and accounting for Tameside’s LHN figure throughout the entirety of the emerging Plan Period will place TMBC in the strongest position for delivering on the economic and social objectives of the emerging Plan.

Housing Supply

- 2.6 The requirement for Councils to demonstrate that they have a 5 Year Housing Land Supply (“5YHLS”) has been strengthened in the NPPF. Tameside is required to demonstrate that it has a 5YHLS each year, based on the adopted requirement (485 dpa) until the PfE Plan is five years old (in March 2029), at which point the 5YHLS will be calculated based on the new or future standard method figure (which is currently 1,124

dpa). This would place immediate additional pressure on Tameside's housing land supply and its ability to demonstrate a 5YHLS. However TMBC has the ability, through this consultation, to ensure that the scope of the emerging Local Plan tackles this step-change in requirement by allocating additional land, over and above that allocated by the PfE.

- 2.7 With the Plan Period running to 2042, it is critical that the emerging Local Plan considers housing need throughout the entire plan period (i.e. beyond 2029 when the PfE Plan is five years old), to ensure sufficient sites are allocated (or safeguarded) later in the plan period to meet its potential future needs and to avoid a situation where the 5YHLS is significantly reduced later in the Plan Period.

Green Belt / Grey Belt

- 2.8 The updated Framework has introduced circumstances where development in the Green Belt may not be regarded as 'inappropriate', where:
- a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
 - b. There is a demonstrable unmet need for the type of development proposed;
 - c. The development would be in a sustainable location, with particular reference to Paragraphs 110 and 115 of the Framework; and
 - d. Where applicable, the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156 and 157.
- 2.9 In terms of criterion a) Grey Belt is defined as land comprising of previously developed land in the Green Belt and/or does not strongly contribute to any of the purposes: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (d) to preserve the setting and special character of historic towns. National Planning Practice Guidance ("NPPG") published in February 2025 provides further clarity on the definition of Grey Belt land and confirms that Green Belt Assessments should consider the Green Belt / Grey Belt as part of the plan making

process. A review of the Site in the context of the Grey Belt definition is provided later in this report.

Comments on the Spatial & Strategic Policies

Policy Approach to HSP S1: Overall Spatial Strategy

2.10 The policy approach to HSP S1 sets out the overall spatial strategy for Tameside which includes making provision for delivering on the adopted housing need of 485 dpa as established by the PfE for the period 2022-2039. Whilst the emerging Tameside Local Plan will extend beyond the PfE plan period to 2039 (covering the period up to 2042), TMBC intend to rely on Paragraph 1.56 of the PfE which identifies that if in any event that a Local Plan looks beyond 2039, the minimum requirement figures set out in Policy JP-H1 should be used to inform local plan targets. Therefore throughout the Plan Period to 2042, TMBC intend to apply annual average figure of 485 homes.

2.11 Whilst the Tameside Emerging Plan is being progressed as a 'Part 2' Plan following the adoption of the PfE in 2024, there is a compelling case to consider the implications of the new national policy context for Tameside – and particularly its revised housing requirement. By only planning for 485 dpa, Tameside are only providing for 43% of their updated LHN as per the standard method. This approach is not appropriate or justified to effectively plan for Tameside's future housing requirement, which will:

- Fundamentally ignore national planning policy direction and not proactively consider the ability of the Borough to meet its potential housing requirement throughout the entirety of the Plan Period – to 2042 – and beyond;
- Not support the economic growth potential of Tameside by providing the homes needed to support its economic potential;
- Not address the affordability issues within the Borough; and
- Lead to a significantly higher housing need in Tameside once the PfE becomes out of date, therefore potentially leading to speculative applications and an appeal-led approach to planning due to a suppressed five year housing land supply.

Policy Approach to HSP H1: Housing Type, Mix, Tenure and Affordability

- 2.12 The approach in relation to HSP H1 sets out that the Council proposes to bring forward policy to ensure that it maximises the delivery of additional affordable homes. This will include setting targets for the provision of affordable housing, self-build, and community led housing and to ensure that housing is provided to meet the needs of specific groups of people.
- 2.13 Richborough supports the Policy Approach to HSP H1 and considers that the emerging Local Plan should ensure that a sufficient mix of housing is provided for all needs, including adequate delivery of both accessible and future-proofed housing for older-people and those with disabilities or other special needs.
- 2.14 However, it is reiterated that by failing to plan appropriately to deliver housing in line with the latest LHN figure, Tameside risk also failing to deliver a sufficient quantity of affordable and specialist housing. The latest Housing Needs Assessment (July, 2020) shows that there is a significant under-delivery of Affordable Housing across Tameside. In line with the Planning Practice Guidance, TMBC should seek to uplift the overall housing requirement sufficiently in order to meet the affordable housing need.
- 2.15 The delivery of large-scale housing developments, that can provide a policy compliant affordable housing offer, provide the most effective way to deliver significant quantities of affordable housing along with enabling the delivery of specialist housing types and tenures. The provision of greater quantities of market housing will also help to alleviate the constraint on supply, and in turn help to reduce the upward pressure on house prices.
- 2.16 It is noted that the site could potentially provide an uplifted amount of affordable housing, subject to viability testing, in line with paragraph 67 and the 'Golden Rules' as introduced by the December 2024 NPPF. This weighs further in favour of exploring the release of suitable Green Belt sites through the OPP.

Comments on the Emerging Local Plan Evidence Base

Tameside Housing Need Assessment ("HNA") 2020

- 2.17 The HNA identifies a gross affordable housing shortfall of 2,407 and a net shortfall of 828 homes per year. This is marked increase from the 2017 assessment which identified a gross shortfall of 1,811 and net shortfall of 421 homes per year. The emerging Local Plan should therefore take this figure into consideration alongside the Planning Practice

Guidance which states that, *“an increase in the total housing requirement included in the plan may need to be considered where it could help deliver the required number of affordable homes”*.

- 2.18 Providing a supply of deliverable and viable sites that can deliver the quantum and mix of market and affordable homes will help TMBC to, in part, close the gap in affordable housing provision and support the retention of residents, first time buyers and workers in the Borough.

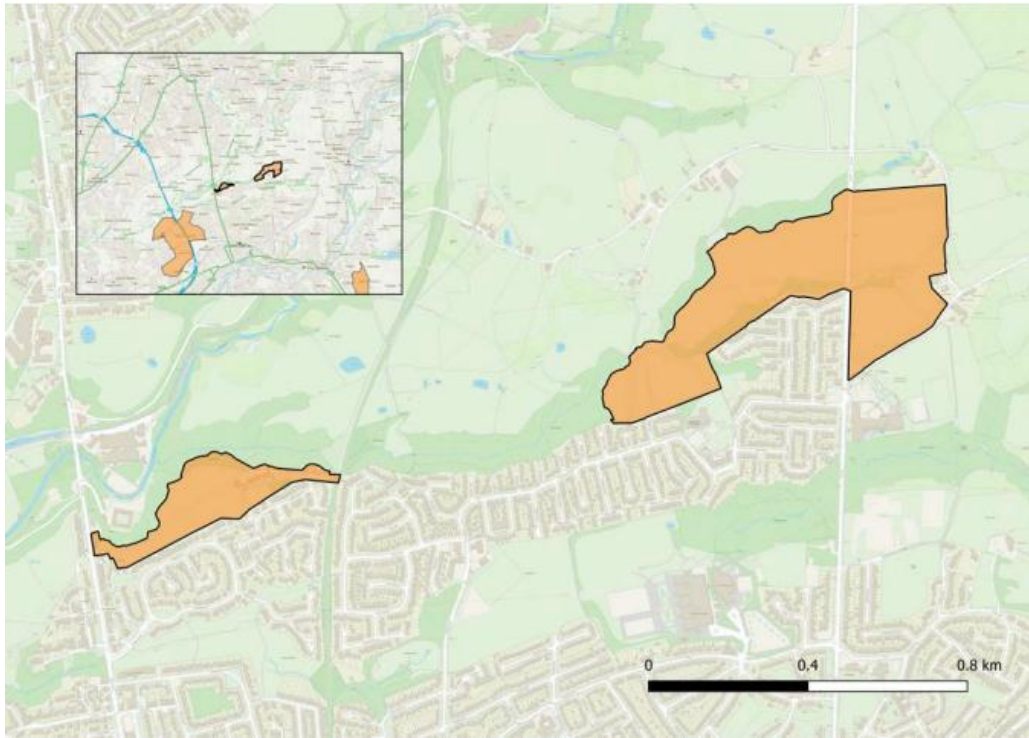
Strategic Housing and Economic Land Availability Assessment (“SHELAA”) 2024

- 2.19 The site is referenced within the Discounted Residential Sites Table, in Appendix 4 of the SHELAA 2024.

Emerging Draft Greater Manchester Spatial Framework (2016)

- 2.20 The site was previously considered as part of a wider strategic allocation (‘North Ashton-under-Lyne, ref: OA27’) as a suitable location to deliver a sensitive extension to the northern edge of Ashton-under-Lyne, benefitting from a draft housing allocation in the 2016 emerging draft Greater Manchester Spatial Framework (since renamed the PFE Plan). Whilst the allocation was ultimately not carried forward or adopted, due to a reduction in the need for Green Belt release in Greater Manchester at the time, the fundamental principles that underpinned the proposed allocation of Lees Road – as a deliverable and logical location for development – remain relevant, and offer an opportunity to address Tameside’s current and future housing needs.

Figure 2: Draft Allocation OA27, Emerging Draft Greater Manchester Spatial Framework (October, 2016)



3 CASE FOR ALLOCATION AND SITE DELIVERABILITY

- 3.1 This section provides an assessment of the case for allocating the site to the east of Lees Road for residential development, based on:
- a. An assessment of the “exceptional circumstances” that exist for the Tameside Local Plan to review the Green Belt Boundary;
 - b. An assessment of whether the site should be considered Grey Belt in the context of the new NPPF Paragraph 155;
 - c. A summary of the deliverability of the site including a review of the technical and environmental considerations, and its availability, suitability and achievability; and
 - d. A review of the potential benefits.

Exceptional Circumstances for Green Belt Review

- 3.2 Paragraph 145 in the NPPF states, “*Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans*”. Paragraph 146 continues, “*Exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means. If that is the case, authorities should review Green Belt boundaries in accordance with the policies in this Framework*”.
- 3.3 As set out in the comments in the previous section, it is considered that Tameside should plan for their minimum housing requirement as set by the standard method (1,124 dpa), which is significantly higher than their adopted requirement in the PfE (485 dpa). If Tameside plan for their minimum housing need, then there is a case for exceptional circumstances to review the Tameside Green Belt as part of the plan making process.

Greater Manchester Spatial Framework Green Belt Assessment

- 3.4 The most recent Green Belt assessment for Tameside was undertaken as part of the evidence base for the Greater Manchester Spatial Framework by LUC in July 2016. The purpose of this was to assess the extent to which land within the Greater Manchester Green Belt performs against the purposes of Green Belt. This Green Belt Assessment

was undertaken prior to the NPPF update and 'Green Belt' National Planning Policy Guidance ("NPPG") (February 2025), and therefore is not a suitable assessment of Green Belt land.

3.5 The NPPG sets out the key steps for a GBA, stating that, *"authorities will need to:*

- *identify the location and appropriate scale of areas to be assessed;*
- *evaluate the contribution each assessment area makes to Green Belt purposes (a), (b), and (d);*
- *consider whether applying the policies relating to the areas or assets of particular importance in footnote 7 to the NPPF (other than Green Belt) would potentially provide a strong reason for refusing or restricting development of the assessment area;*
- *identify grey belt land;*
- *identify if the release or development of the assessment area/s would fundamentally undermine the five Green Belt purposes (taken together) of the remaining Green Belt when considered across the area of the plan."*

3.6 In relation to the first bullet point, above, the NPPG proceeds to set out a number of "principles" to be considered. Central to these principles is a focus on ensuring that assessment areas are *"sufficiently granular to enable the assessment of their variable contribution to Green Belt purposes"* with *"local circumstances"* being an identified necessary consideration. It is on this point where the 2016 GBA is fundamentally flawed in relation to the land to the east of Lees Road, as the parcel within which the Site sits (ref: TS05), cover too broad an area preventing any consideration of local context (specifically the contained nature of the Site by virtue of the surrounding road network, adjacent residential development, and tree boundaries). This produced an inaccurate and unsuitable assessment of the Site against the Green Belt purposes, and necessitates an updated assessment in accordance with National Policy.

Grey Belt

3.7 Paragraph 155 of the NPPF, set out in the previous section, outlines the criteria in which development is not considered “inappropriate” in the Green Belt where:

- a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
- b. There is a demonstrable unmet need for the type of development proposed;
- c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of the Framework; and
- d. Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157.

3.8 This is relevant to inform plan making and decision taking, and in particular, to consider whether the Site could be defined as “Grey Belt”. A high level assessment of the Grey Belt credentials of the Site are set out as follows:

Criteria a) – we consider the Site to be a Grey Belt site in the context of the NPPF. It does not perform strongly against any of the purposes of the Green Belt (including purpose c and e), but in particular makes a less than strong contribution to purposes a), b) and d), based on the Green Belt National Planning Practice Guidance (“NPPG”) published on 27th February 2025.

- **Purpose A** – relates to checking the unrestricted sprawl of large built-up areas. The site is adjacent to the existing residential area to the west (beyond Lees Road) and is well contained by Twirl Hill Road to the north and east and by Lily Lanes to the south. The surrounding roads are considered to be physical features that could restrict and contain development to the site, which weaken the site’s contribution to this purpose. Therefore, it is considered that the Site would have a **moderate contribution** to Purpose A.
- **Purpose B** – relates to preventing neighbouring towns merging into one another. The site is located on the northern edge of Ashton-under-Lyne with the closest neighbouring town being Oldham to the north. The closest gap between the settlements is around 1.5km, with Lees New Road forming a direct link between

the two settlements. It is considered that the site only forms a small part of the gap between the towns and is able to be developed without the loss of visual separation between the towns. Therefore, it is considered that the Site would have a **weak contribution** to Purpose B.

- **Purpose D** – relates to preserving the setting and special character of historic towns. The site would have make **no contribution** to Purpose D as it does not form part of the setting of any historic town.

Contribution to the Wider Green Belt

- 3.9 The site is a well-contained parcel on the northern edge of Ashton-under-Lyne with well-defined boundaries, and therefore has limited functional contribution to the Green Belt in this locality. The contained nature of the site, by Twirl Hill Road and Lily Lanes, means that its development would have a very limited impact on the wider landscape character and openness of the Green Belt.
- 3.10 In summary, it is considered that the development of the site would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan (in accordance with Paragraph 155a).

A Deliverable Site

- 3.11 The NPPF seeks to ensure that deliverable sites are provide in appropriate locations to meet housing needs and support economic growth. To be considered deliverable, sites should be available, suitable and achievable and should be available to be brought forward within a realistic timeframe once the Local Plan is adopted.

Environmental and Technical Considerations

- 3.12 The site is considered to be wholly deliverable in the context of the NPPF and does not have any constraints that cannot be mitigated through a sensitive approach to masterplanning and design. The following provides a summary of the key considerations that have influenced an emerging Illustrative Masterplan for the site (which is included at **Appendix 2**):

Highways and Access

3.13 A Transport Technical Note has been produced by PTB Transport Planning Ltd to underpin the Illustrative Masterplan for the site. The assessment confirms that access to the site would be provided from Lees Road; and that the site is fully deliverable, in terms of access, for residential development.

3.14 It concludes that:

“Suitable access can be achieved from Lees Road via a ghost-island priority junction with adequate visibility splays. A Transport Assessment will be carried out to support the planning application and will include capacity assessments of the site access and offsite junctions in the vicinity of the site.

At this stage, it is not expected that there will be a material impact across the wider highway network. The site is well served in terms of local bus services and local facilities with connections to Oldham, Ashton-Under-Lyne and Manchester.”

Flood Risk and Drainage

3.15 The Environment Agency’s Flood Map for Planning identifies the site as wholly within Flood Zone 1, indicating the lowest level of flood risk, and therefore would not constitute a significant constraint to development. There are some limited areas of surface water flood risk which have been considered within the illustrative layout for the site. Richborough will undertake more detailed flood risk and drainage work to underpin evolving designs for the site as the Local Plan is progressed.

Landscape, Ecology, and Arboriculture

3.16 A Landscape, Ecology and Arboricultural Overview report has been undertaken by Tyler Grange to understand the baseline landscape and ecology conditions.

3.17 The key findings of this work are as follows:

- **Landscape** – an initial landscape and visual assessment considers that the site can accommodate development without resulting in unrestricted urban sprawl or coalescence of urban areas. It also states that visual screening is provided by the woodland vegetation at Holden Clough to the north and west. As a result of the containment provided by the surrounding vegetation and the local topography of the

site, few visual receptors would be affected as a result of the development of the site, and appropriate mitigation measures could be taken to ensure any impact is minimal.

- **Ecology** – to safeguard any impact on the Holden Clough SBI, Tyler Grange recommend a minimum offset of 15m between the SBI boundary and any development would be required. A high-level assessment of on-site habitats and species has been undertaken, which has not identified any significant constraints that could not be mitigated through a sensitive approach to design and development. However, Richborough will undertake further ecological and BNG assessment work as the Local Plan is progressed to inform the masterplanning of the site.
- **Arboriculture** – an arboricultural assessment has identified key trees on the site. The emerging masterplan seeks to maintain the on-site woodland and important trees, and provides a sufficient buffer to protected woodland which is present within and adjacent to the site.

3.18 The Tyler Grange report concludes that the site is suitable for residential development based on a preliminary assessment, in respect of landscape and visual, ecological and arboricultural matters.

Archaeology and Heritage

3.19 A Heritage and Archaeological Technical Note has been produced by CgMs Consulting. This desk-based assessment of the site has established that there are no designated or non-designated heritage assets within the proposed development site.

3.20 The overall conclusions are:

- i. Whilst there is some potential for a minor impact on the heritage significance of a designated heritage asset within the study area, this is not considered to be in conflict with Policy C6 (Setting of Listed Buildings) of the Tameside Metropolitan Borough Council Unitary Development Plan Document (2004).
- ii. The desk-based assessment has established that the study site has a low to moderate potential for significant archaeological remains of all periods.

- iii. There is no evidence to suggest that the study site is likely to contain nationally important archaeological remains that would prohibit development or require preservation in situ. There are not considered to be any heritage constraints to development of the site.

Agricultural Land Classification

- 3.21 An Agricultural Land Classification (“ALC”) report has been produced by Soil Environmental Services to accompany these representations.
- 3.22 This report concludes that the site is of an ALC Grade 4, based upon the grading system established by the ‘Agricultural Land Classification of England and Wales’ (Guidance and criteria for grading the quality of agricultural land).
- 3.23 The Grading system allocates a number between 1 and 5, with Grade 1 land being ‘Excellent quality agricultural land’ and Grade 5 ‘Very poor quality agricultural land’. Grade 4, i.e. this site, is defined as being ‘Poor quality agricultural land’, with severe limitations which significantly restrict the range of crops and/or level of yields.
- 3.24 Based upon this ALC Grading, the development of this site for housing would not result in the loss of agricultural land of high value.

Illustrative Masterplan

- 3.25 Work to date has shown that there are no significant technical or environmental constraints that would impact the deliverability of the site and any adverse impacts caused by the development of the site could be appropriately mitigated. Richborough has appointed a professional design and technical team that will undertake further technical work to further underpin the masterplanning of the site and to support the Local Plan process.
- 3.26 An initial Illustrative Masterplan, included at **Appendix 2**, has been prepared to demonstrate how the site could be sensitively developed to accommodate around 220 homes in the context of the site’s high-level constraints. This early masterplan includes land to the west of Lees Road which is also within Richborough’s control and could come forward as part of a wider allocation for a total of approximately 500 units. This illustrates one way in which the site could be brought forward for development and would

be further developed and refined as additional technical work is undertaken and in consultation with the Council and key stakeholders.

3.27 Some of the core design principles of the masterplan are as follows:

- A proposed (principal) vehicular access off Lees Road;
- New pedestrian crossings points to link with existing residential streets;
- A Woodland walk and nature play trail and nature trail to benefit new and existing residents;
- An ecology corridor to support on-site habitats and the Holden Clough SBI;
- The retention of existing public footpaths set within new public open space;
- Retention of northerly views to wider landscape and towards Hartshead Pike;
- Sustainable Urban Drainage at the low points of the site;
- A new woodland and soft edge with adequate setbacks;
- Principal tree lined streets and looped vehicular routes;
- Outward facing development zones (providing natural surveillance);
- Tiered building patterns (and wider building offsets to address sloping topography of site);
- Linked central landscaped green corridors to connect distinct development parcels;
- Focal point spaces; and
- Higher density development 'core' and lower density development edges.

Deliverability and Key Benefits

3.28 The Illustrative Masterplan has the potential to deliver a range of economic, social and environmental benefits on the site. This section provides a summary of the deliverability of the site and an assessment of the key benefits that allocating the site for development would bring to Ashton-under-Lyne.

A Deliverable Site

- 3.29 The NPPF seeks to ensure that deliverable sites are provided in appropriate locations to meet housing needs and support economic growth. To be considered deliverable, sites should be available, suitable and achievable and should be available to be brought forward within a realistic timeframe once the Local Plan is adopted.
- 3.30 Richborough is fully committed to promoting the site for development and consider that it could be brought forward immediately on adoption of the Local Plan to meet the housing needs of the Borough. The site could be brought forward individually for approximately 220 homes or as part of a wider allocation including land to the west of Lees Road for the joint total of approximately 500 homes.
- 3.31 In summary the Site is:
- **Available** – Richborough has entered into an agreement with the landowner to promote the site for residential development. Upon the grant of outline planning permission, the site will be sold to a preferred development partner who will be responsible for securing reserved matters approval and then commencing construction and delivering new homes at the earliest opportunity. Richborough has a proven track record of facilitating the delivery of high-quality housing developments on suitable and sustainable sites and can confirm that the site can be delivered for housing within the early phases of the Local Plan period. Richborough are strong advocates of a plan-led system and are committed to promoting land for residential development by engaging actively with local authorities, parish councils and other neighbourhood forums through local and neighbourhood plans.
 - **Suitable** - the site is entirely suitable for a residential development for the following reasons:
 - It offers a highly accessible and sustainable location for development that would support a balanced spatial strategy and which could be brought forward early in the plan period following any allocation.
 - It is a logical and natural extension to Ashton-under-Lyne that would deliver a sensitive extension to the urban area.

- The Site should be considered as Grey Belt in any Green Belt Review, based on the NPPF and NPPG.
 - It is a site that was previously considered to be suitable for residential development (under draft Policy OA27) in the early emerging GMSF.
 - There are no environmental or technical constraints that would prevent the development of the site, subject to suitable mitigation and a sensitive approach to design.
 - It can deliver satisfactory vehicular access and has access to the strategic highway network via Lees Road.
- **Achievable** – the Illustrative Masterplan demonstrates how the site responds to its physical characteristics, technical considerations and surrounding context by providing a sensitive landscape-led scheme. An assessment of the site constraints illustrates that delivery of the entire site is achievable, and a professional team of technical experts will support the detailed design of the site moving forward. Where any potential constraints have been identified, Richborough has considered the necessary mitigation measures and required investment in order to overcome any deliverability barriers. Richborough has reviewed the economic viability of the scheme in terms of the land value, attractiveness of the locality, level of potential market demand and projected rate of sales in Ashton-under-Lyne; as well as the cost factors associated with the site including site preparation costs and site constraints. In addition, Richborough has extensive experience working with nationally significant development partners, as well as SME housebuilders. Developer partners who have built out Richborough sites include Bellway, Barratt David Wilson, Bloor, Castlegreen, CALA, Miller, Mulberry, Kier, Lion Court, Persimmon, Taylor Wimpey and Vistry. On Richborough's sites, the average completion rate per sales outlet is a combined rate of 50 dpa for both market and affordable housing provision. Richborough confirms that the development of the site is economically viable, deliverable and achievable in accordance with the NPPF.

Key Benefits

3.32 The allocation of the site will support new housing in an appropriate location and ensure that a quantity, quality and mix is provided to support the economic growth of Tameside. The delivery of the site will provide significant benefits to the Borough and to Ashton-under-Lyne. These are summarised as follows:

Economic Benefits

3.33 The development of the site will have significant economic benefits, both from its construction and occupation. Key economic benefits may include:

- Generating investment during the construction phase of development through construction cost, FTE construction jobs and an increase in GVA.
- Providing long term occupational / operational benefits including new resident expenditure, attracting new residents to TMBC, generating flow on and supported jobs and, overall, generating increased economic output in the Borough.
- Generating significant revenue for the Local Authority, with a development of new homes generating revenue in Council Tax revenue, New Homes Bonus and through Section 106 contributions.
- Underpinning the catalytic growth opportunities in Tameside by providing the type, quality and spatial distribution of homes in the Borough that will allow it to capitalise on its locational advantages as part of the Greater Manchester conurbation.

Social Benefits

3.34 The delivery of the site will have clear social benefits for existing and future residents, in terms of providing better choice, improving access to amenities and meeting a variety of identified housing needs. The key social benefits include:

- Delivering high quality market homes to meet the needs of the Borough's existing and future employees, supporting the future growth of the Borough.
- Providing viable and deliverable affordable homes to address the Borough's affordability crisis and support the housing of key workers and other first time buyers. The site would provide, at a minimum, a policy compliant level of affordable housing, with potential uplifts to meet the latest NPPF's 'Golden Rules'.

- Delivering new and accessible multifunctional open spaces, amenity spaces and green infrastructure to benefit existing and future residents.

Environmental Benefits

3.35 The development of the site has the potential to uplift the biodiversity, accessibility and overall enjoyment and environmental value of the site. In addition, the site has the potential to be an exemplar in sustainable design and construction. Key environmental benefits include:

- The site will create new habitats for a range of species and will seek to provide a biodiversity net gain on-site.
- The provision of multi-functional green infrastructure and open space that will generate significant recreational benefits for existing and prospective residents, including a new woodland walk and nature trail.
- The protection and enhancement of existing features of the site that add value, including the Holden Clough SBI and mature trees and hedgerows.
- The promotion of and commitment to new cutting edge net zero technologies by Richborough.

Summary

3.36 This section has set out the case for the allocation of the site in the context of national planning policy, the Council's housing need, the inherent deliverability of the sites and the benefits that could be generated.

4 CONCLUSIONS

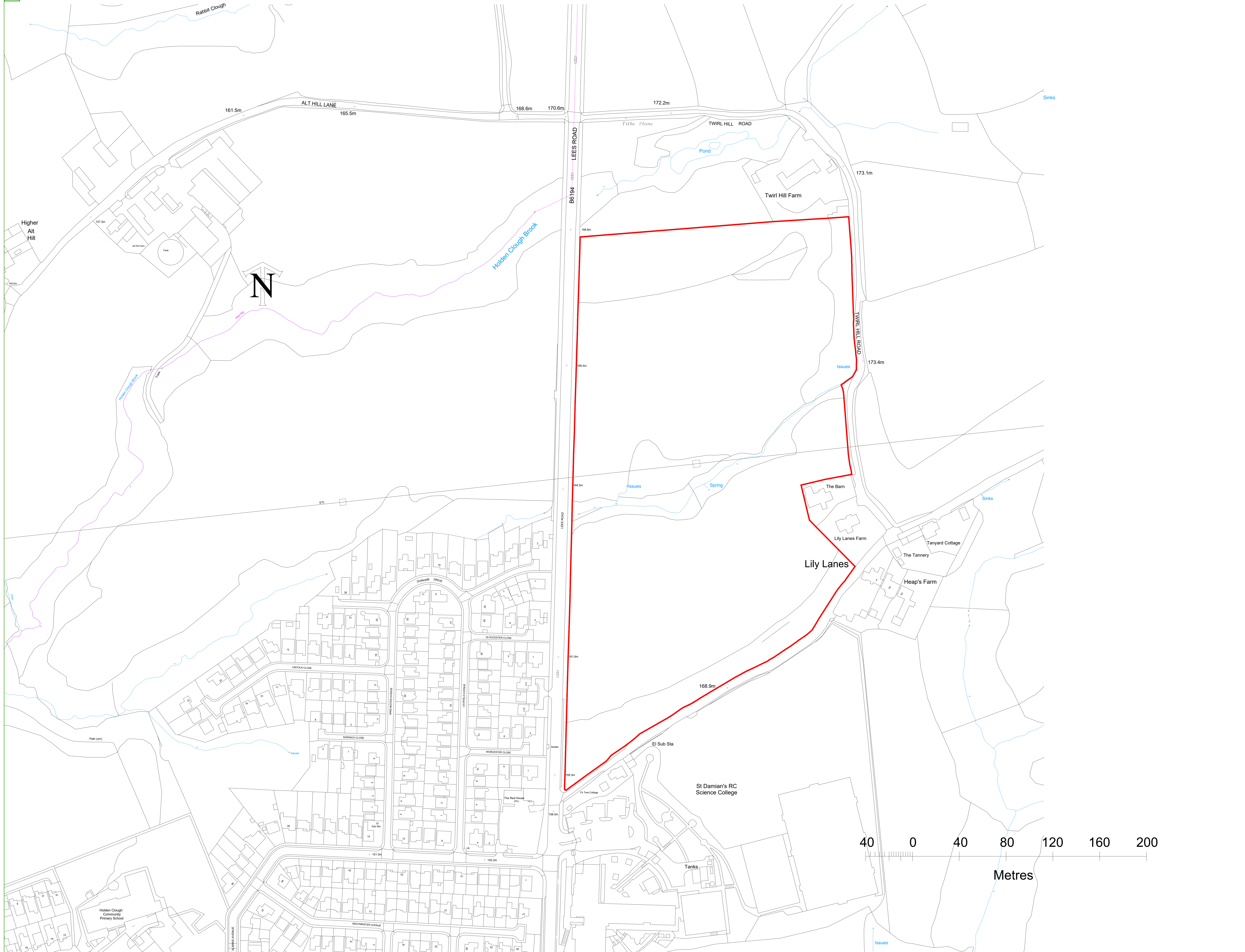
4.1 In summary, Richborough considers that the new Local Plan provides a once-in-a-generation opportunity to plan for the future of Tameside and deliver a pro-growth approach which will deliver sufficient homes to meet its future housing requirements, address the housing crisis for TMBC's residents, alleviate affordability issues and support economic growth during the next 15-20 years.

4.2 Richborough's key recommendations are as follows:

1. The Council should **plan for a significantly higher housing requirement (of a minimum of 1,124 dpa)** in line with the national policy context. Failure to do so will result in an out of date plan in less than five years, that will open up the Borough to an appeal-led approach to planning during the proposed plan period (i.e. the opposite of a 'plan-led approach').
2. Due to the scale of the housing requirement and the lack of sites within the urban area to meet this need, **a strategic review of the Green Belt should be undertaken**; to identify suitable sites that could meet the future needs. This would complement the strategic allocations identified in the PfE and enable the Borough to meet its own needs in the context of the existing and emerging housing requirement.
3. As well as allocating sufficient land, the Council should also **consider identifying safeguarded or reserve sites**, to ensure the Local Plan has the flexibility to meet its future needs, both within and beyond the plan period.
4. **The site to the east of Lees Road, Ashton should be considered for allocation in the emerging Local Plan as a site that is available, suitable and achievable, and as Grey Belt site if a review of the Green Belt is undertaken**, in the context of the NPPF.

4.3 Richborough respectfully request that the site and the information contained in these representations is considered as the emerging Local Plan and site assessment process is progressed. Richborough would welcome engagement with the Council on these representations, and would be happy to facilitate a site visit if required, and this can be arranged by Asteer.

APPENDIX 1 – SITE LOCATION PLAN



Notes:
This overlay is based on current OS base data.

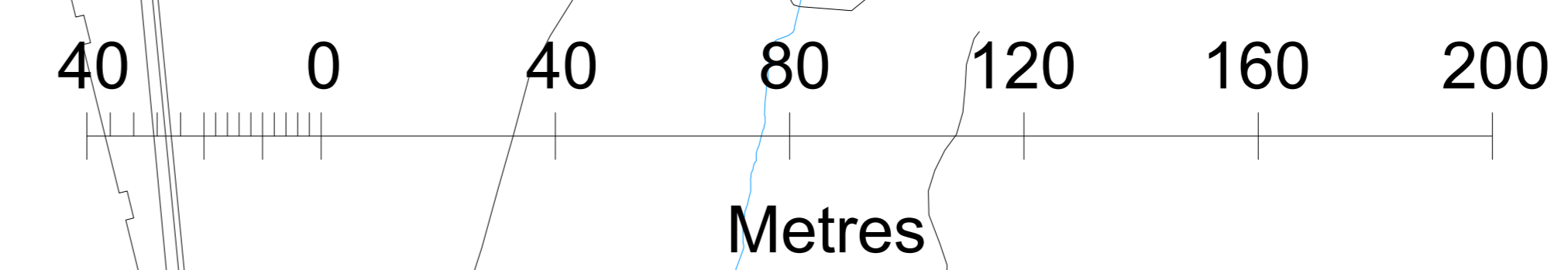
KEY:
East Parcel Application Boundary
c.9.30ha

Revision:
Birmingham
Second Floor, Waterloo House
20 Waterloo Street
Birmingham, B2 5TB
Tel: 0121 635 4600
info@rightboroughestates.co.uk
London
8 St James's Square
London, SW1Y 4LS
Tel: 02030 111 353

Project Number:
Land off Lees Road,
Ashton Under Lyne (East)

Title:
Application Boundary Plan

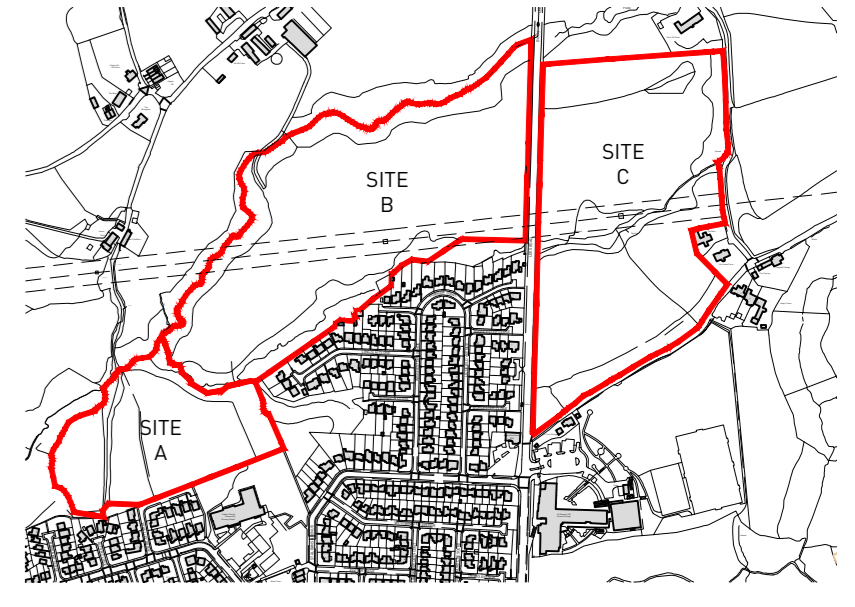
Drawn date:
28/05/2025
Drawn by:
ES
Scale:
1/1000 @ A0
Drawing number:
R-LRAUL-ABP-01
Revision:



APPENDIX 2 – ILLUSTRATIVE MASTERPLAN



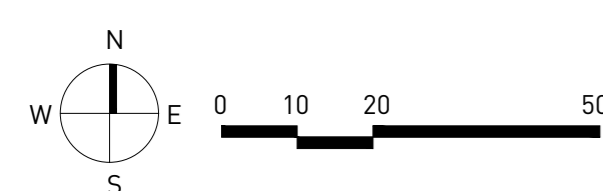
SITE AREAS:
 SITE A: 9.2 ACRES / 3.72 HECTARES
 SITE B: 24.88 ACRES / 10.07 HECTARES
 SITE C: 22.95 ACRES / 9.29 HECTARES



- KEY**
- Overall site location
 - Proposed residential development
 - Overall public open space
 - Existing landscape
 - Existing woodland
 - Existing woodland
 - Indicative sustainable drainage
 - Public footpath network
 - Key pedestrian linkages

- KEY DESIGN PRINCIPLES**
1. Proposed (principal) vehicular accesses off Bristol Road;
 2. Proposed vehicular access off Whalley Grove;
 3. Pedestrian crossings points to link with existing residential streets;
 4. Woodland walk and nature trail;
 5. Ecology corridor;
 6. Existing watercourse;
 7. Natural play trail;
 8. Existing public footpaths retained in public open space;
 9. Northerly views to wider landscape;
 10. Views towards Hartshead Pike;
 11. Mirror existing linear residential frontage with offset to for sustainable drainage (assumed site low point);
 12. New woodland and soft edge;
 13. Existing overhead cables and assumed 30 metres (overall easement);
 14. Street pattern orientated part screen views of pylon towers;
 15. Principal tree lined street and looped vehicular route;
 16. Outward facing development zones (providing natural surveillance);
 17. Tiered building patterns (and wider building offsets to address sloping topography of site);
 18. Linked central landscaped green corridor to connect development sites;
 19. Focal point spaces;
 20. Existing stone wall to be retained;
 21. Higher density development 'core';
 22. Lower density development edges;
 23. Direct frontage access off Whalley Grove;
 24. New housing frontage to overlook existing school; and
 25. Continue existing Burham Close building line.

NOTE:
 This drawing is for indicative purposes and subject to detailed design and site survey



LAND TO THE EAST AND WEST OF LEES ROAD, ASHTON-UNDER-LYNE PROPOSED INDICATIVE MASTERPLAN





Tameside Local Plan Consultation

Response to Homes, Spaces, Places Options and Preferences Consultation Draft

Submission in relation to:

[Land to the west of Lees Road, Ashton-under-Lyne](#)

On behalf of Richborough

June 2025

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3	CASE FOR ALLOCATION AND SITE DELIVERABILITY	11
4	CONCLUSIONS	23

APPENDICES

APPENDIX 1: Site Location Plan

APPENDIX 2: Illustrative Masterplan

Prepared By: Jon Power (Director) and Hope Bleasdale (Planner)

Asteer Planning LLP, Calico, 53-55 Mosley Street, Manchester, M2 3HQ

Version v.3

Date: 30th May 2025

1 INTRODUCTION

- 1.1 This submission has been prepared by Asteer Planning LLP (“Asteer”) on behalf of Richborough in response to the Tameside Council Homes, Spaces, Places Options and Preferences (“OPP”) Local Plan Consultation, running from the 14th April until 2nd June 2025.
- 1.2 The emerging Local Plan for Tameside provides a unique opportunity for the Borough to holistically plan for its strategic growth, including its housing and employment needs, and to capitalise on its intrinsic strengths over the next Plan Period and beyond, by planning for the type, quality, and scale of land that will meet identified needs, and support its economic and social growth over the next 25-30 years.
- 1.3 These representations provide Richborough’s response to the OPP consultation and seek to assist in informing the emerging Local Plan spatial strategy, strategic policies and land allocations, by demonstrating the potential of land to the west of Lees Road to support the needs of Tameside during the next Plan Period.

About Richborough

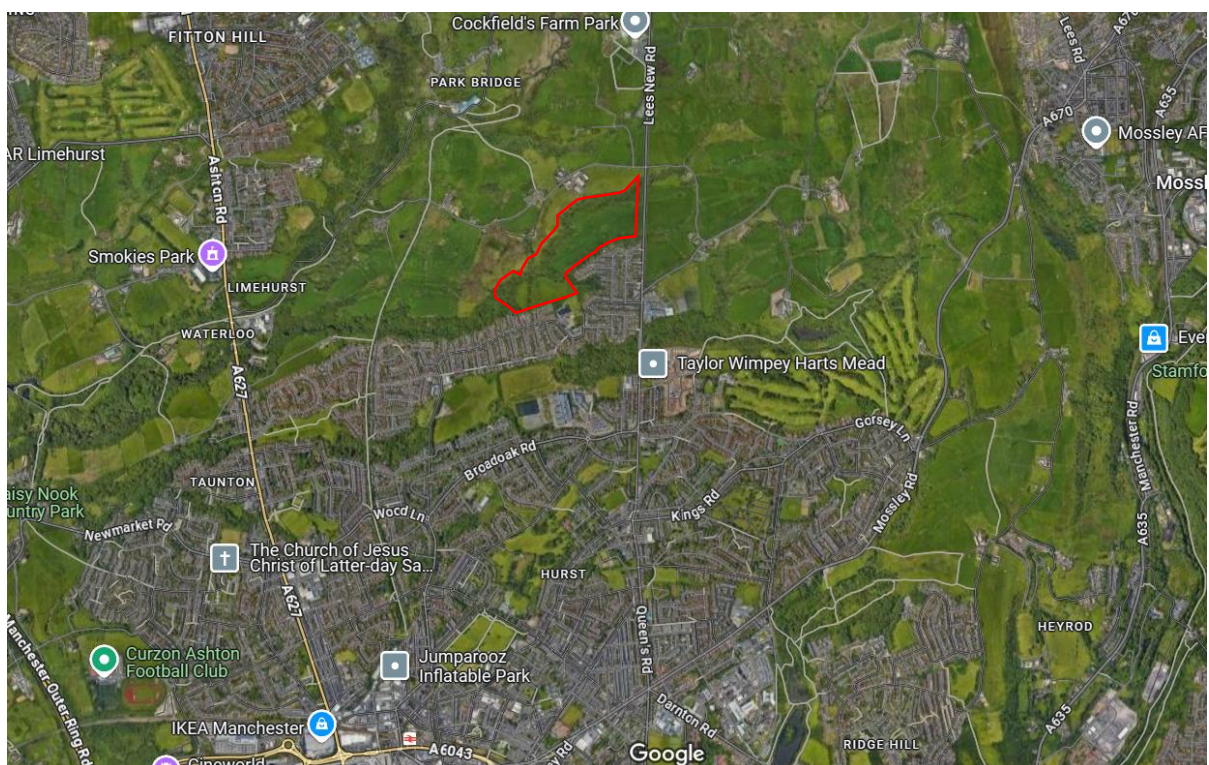
- 1.4 Richborough was founded in 2003 and is one of the UK’s most successful specialist land promotion business , supplying consented land to the property and construction industry to accelerate the delivery of new homes and jobs. It is a founding member of the Land, Planning and Development Federation (“LPDF”) and a member of both the British Property Federation (“BPF”) and Home Builders Federation (“HBF”). It interacts daily with Local Planning Authorities (“LPAs”), local stakeholders and statutory consultees.
- 1.5 Richborough works in partnership with private and public sector landowners to promote land via the planning system for residential, commercial and mixed-use development. It focuses heavily on place-making, local communities and complementing and enhancing existing infrastructure. The Richborough land promotion model incentivises all parties to seek an allocation in the emerging plan and ensure that, once outline planning permission is secured, the preferred development partner will commence construction and deliver schemes at the earliest opportunity. It has an extensive track record that can be viewed on its website.

- 1.6 Richborough has an agreement to promote the land at Lees Road, Ashton-under-Lyne on behalf of the landowner. It has already submitted representations through several rounds of consultation including the previous Homes, Spaces, Places Scoping Document, Integrated Assessment and Call for Sites in September 2024. Prior to this representations were submitted to the Tameside Local Plan Scoping Consultation in 2017 and subsequently through the Greater Manchester Spatial Framework (“GMSF”) and latterly, the Places for Everyone (“Pfe”) Plan.

Background and Context

- 1.7 The site measures approximately 15.4 14 hectares (“ha”) in size and is well contained open agricultural land. To the immediate south of the site is the existing built settlement of Ashton-under-Lyne and Holden Clough Community Primary School. The north and west of the site is bounded by dense woodland which screens the site from the wider countryside. A Site Location Plan is included at **Appendix 1**.

Figure 1: Site Context Plan (illustrative purposes only)



- 1.8 The site represents a logical and appropriate extension to Ashton-under-Lyne, with the ability to provide a defensible northern boundary to the settlement. It is in a sustainable location, on the northern edge of Ashton-under-Lyne, with access to a range of existing

services and facilities. It provides an opportunity to make a positive contribution to Tameside's increasing housing requirements, including affordable homes, on a deliverable site, early in the Plan Period. The site can deliver development that meets the highest standards of sustainable design, while supporting significant enhancement to biodiversity and providing new open space and recreational opportunities which are accessible to the local community.

1.9 The remainder of this submission provides:

- **Comments on the Options and Preferences Draft Plan** – including the housing requirement, spatial strategy, and approach to land allocations (including Green Belt). This is in the context of:
 - The new NPPF, including the increased housing requirement for Tameside and new Green Belt / Grey Belt Policy;
 - The employment growth / potential of Tameside and the need for homes to support it;
 - The housing land supply and the gap between PfE allocations, existing claimed supply and the housing requirement; and
 - Any relevant documents from the Local Plan Evidence Base.
- **The Case for Allocation and Site Deliverability** – an assessment of why the site should be considered for development / allocation, based on the following:
 - A summary of the “exceptional circumstances” that exist for the Tameside Local Plan to review the Green Belt boundary;
 - A high level Grey Belt review;
 - A summary of the deliverability of the site – including a review of the technical and environmental considerations, and its availability, suitability and achievability.
- **Conclusions and Recommendations.**

- 1.10 Richborough would welcome ongoing engagement with the Council as the OPP Consultation responses are considered and the preparation of a new Local Plan is progressed. Richborough would be happy to discuss any feedback in relation to these representations, or in relation to the site individually.

2 COMMENTS ON THE OPTIONS AND PREFERENCES DRAFT PLAN

- 2.1 This section provides comments on the OPP draft plan, including the emerging spatial strategy, strategic policies and approach to land allocations (including Green Belt), as they relate to the national policy context.

National Context

- 2.2 On 12th December 2024, a new National Planning Policy Framework (“NPPF” or “the Framework”) was published, with immediate effect. This builds on the Government’s housebuilding and delivery manifesto pledges, and seeks to support the delivery of land and sites across the country.
- 2.3 The new NPPF includes significant changes with regards to housing delivery and the Green Belt. The key implications of relevance for Tameside and the site are as follows:

Housing Requirement

- 2.4 Tameside’s housing requirement has risen from 485 dwellings per annum (“dpa”) (in the adopted PfE Plan) to 1,124 dpa using the new standard method – an increase of 639 dwellings per year.
- 2.5 Tameside is currently required to deliver housing in line with the housing requirement figure set by the PfE (485 dpa), however, once this Plan becomes five years old (in March 2029), Tameside will be required to deliver sufficient housing to meet the latest Local Housing Need (“LHN”) figure (1,124 dpa). This will be a very significant increase in Tameside’s housing requirement of 132% that will need to be addressed in both decision taking and plan making. Working pro-actively and accounting for Tameside’s LHN figure throughout the entirety of the emerging Plan Period will place TMBC in the strongest position for delivering on the economic and social objectives of the emerging Plan.

Housing Supply

- 2.6 The requirement for Councils to demonstrate that they have a 5 Year Housing Land Supply (“5YHLS”) has been strengthened in the NPPF. Tameside is required to demonstrate that it has a 5YHLS each year, based on the adopted requirement (485 dpa) until the PfE Plan is five years old (in March 2029), at which point the 5YHLS will be calculated based on the new or future standard method figure (which is currently 1,124

dpa). This would place immediate additional pressure on Tameside's housing land supply and its ability to demonstrate a 5YHLS. However TMBC has the ability, through this consultation, to ensure that the scope of the emerging Local Plan tackles this step-change in requirement by allocating additional land, over and above that allocated by the PfE.

- 2.7 With the Plan Period running to 2042, it is critical that the emerging Local Plan considers housing need throughout the entire plan period (i.e. beyond 2029 when the PfE Plan is five years old), to ensure sufficient sites are allocated (or safeguarded) later in the plan period to meet its potential future needs and to avoid a situation where the 5YHLS is significantly reduced later in the Plan Period.

Green Belt / Grey Belt

- 2.8 The updated Framework has introduced circumstances where development in the Green Belt may not be regarded as 'inappropriate', where:
- a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
 - b. There is a demonstrable unmet need for the type of development proposed;
 - c. The development would be in a sustainable location, with particular reference to Paragraphs 110 and 115 of the Framework; and
 - d. Where applicable, the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156 and 157.
- 2.9 In terms of criterion a) Grey Belt is defined as land comprising of previously developed land in the Green Belt and/or does not strongly contribute to any of the purposes: (a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns merging into one another; (d) to preserve the setting and special character of historic towns. National Planning Practice Guidance ("NPPG") published in February 2025 provides further clarity on the definition of Grey Belt land and confirms that Green Belt Assessments should consider the Green Belt / Grey Belt as part of the plan making

process. A review of the Site in the context of the Grey Belt definition is provided later in this report.

Comments on the Spatial & Strategic Policies

Policy Approach to HSP S1: Overall Spatial Strategy

2.10 The policy approach to HSP S1 sets out the overall spatial strategy for Tameside which includes making provision for delivering on the adopted housing need of 485 dpa as established by the PfE for the period 2022-2039. Whilst the emerging Tameside Local Plan will extend beyond the PfE plan period to 2039 (covering the period up to 2042), TMBC intend to rely on Paragraph 1.56 of the PfE which identifies that if in any event that a Local Plan looks beyond 2039, the minimum requirement figures set out in Policy JP-H1 should be used to inform local plan targets. Therefore throughout the Plan Period to 2042, TMBC intend to apply annual average figure of 485 homes.

2.11 Whilst the Tameside Emerging Plan is being progressed as a 'Part 2' Plan following the adoption of the PfE in 2024, there is a compelling case to consider the implications of the new national policy context for Tameside – and particularly its revised housing requirement. By only planning for 485 dpa, Tameside are only providing for 43% of their updated LHN as per the standard method. This approach is not appropriate or justified to effectively plan for Tameside's future housing requirement, which will:

- Fundamentally ignore national planning policy direction and not proactively consider the ability of the Borough to meet its potential housing requirement throughout the entirety of the Plan Period – to 2042 – and beyond;
- Not support the economic growth potential of Tameside by providing the homes needed to support its economic potential;
- Not address the affordability issues within the Borough; and
- Lead to a significantly higher housing need in Tameside once the PfE becomes out of date, therefore potentially leading to speculative applications and an appeal-led approach to planning due to a suppressed five year housing land supply.

Policy Approach to HSP H1: Housing Type, Mix, Tenure and Affordability

- 2.12 The approach in relation to HSP H1 sets out that the Council proposes to bring forward policy to ensure that it maximises the delivery of additional affordable homes. This will include setting targets for the provision of affordable housing, self-build, and community led housing and to ensure that housing is provided to meet the needs of specific groups of people.
- 2.13 Richborough supports the Policy Approach to HSP H1 and considers that the emerging Local Plan should ensure that a sufficient mix of housing is provided for all needs, including adequate delivery of both accessible and future-proofed housing for older-people and those with disabilities or other special needs.
- 2.14 However, it is reiterated that by failing to plan appropriately to deliver housing in line with the latest LHN figure, Tameside risk also failing to deliver a sufficient quantity of affordable and specialist housing. The latest Housing Needs Assessment (July, 2020) shows that there is a significant under-delivery of Affordable Housing across Tameside. In line with the Planning Practice Guidance, TMBC should seek to uplift the overall housing requirement sufficiently in order to meet the affordable housing need.
- 2.15 The delivery of large-scale housing developments, that can provide a policy compliant affordable housing offer, provide the most effective way to deliver significant quantities of affordable housing along with enabling the delivery of specialist housing types and tenures. The provision of greater quantities of market housing will also help to alleviate the constraint on supply, and in turn help to reduce the upward pressure on house prices.
- 2.16 It is noted that the site could potentially provide an uplifted amount of affordable housing, subject to viability testing, in line with paragraph 67 and the 'Golden Rules' as introduced by the December 2024 NPPF. This weighs further in favour of exploring the release of suitable Green Belt sites through the OPP.

Comments on the Emerging Local Plan Evidence Base

Tameside Housing Need Assessment ("HNA") 2020

- 2.17 The HNA identifies a gross affordable housing shortfall of 2,407 and a net shortfall of 828 homes per year. This is marked increase from the 2017 assessment which identified a gross shortfall of 1,811 and net shortfall of 421 homes per year. The emerging Local Plan should therefore take this figure into consideration alongside the Planning Practice

Guidance which states that, *“an increase in the total housing requirement included in the plan may need to be considered where it could help deliver the required number of affordable homes”*.

- 2.18 Providing a supply of deliverable and viable sites that can deliver the quantum and mix of market and affordable homes will help TMBC to, in part, close the gap in affordable housing provision and support the retention of residents, first time buyers and workers in the Borough.

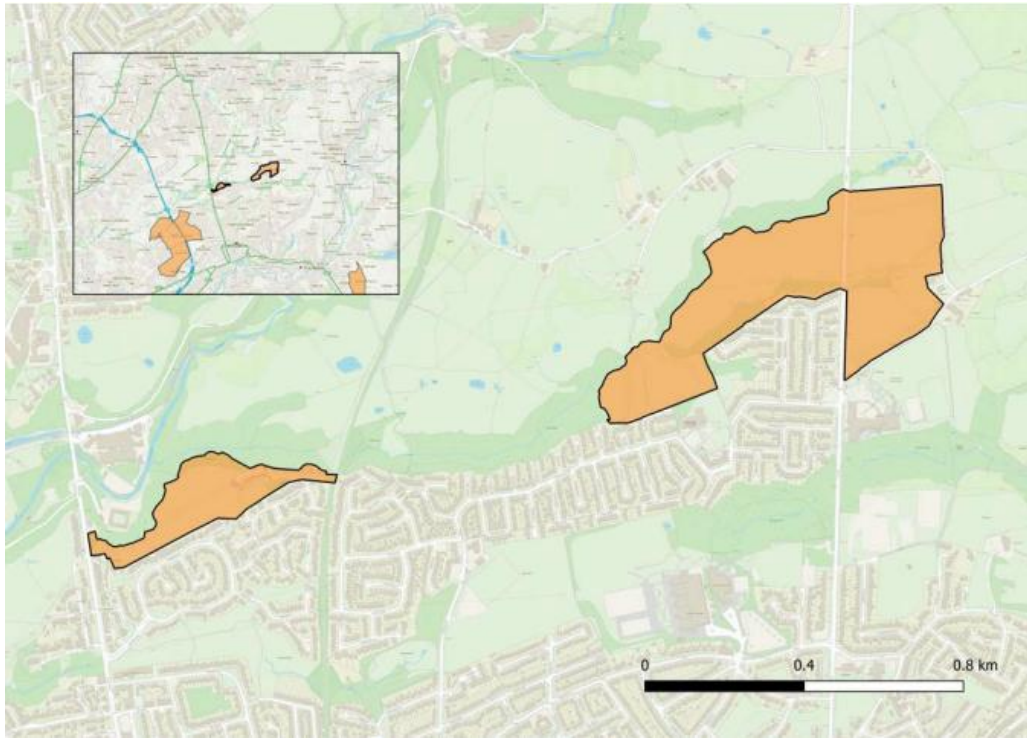
Strategic Housing and Economic Land Availability Assessment (“SHELAA”) 2024

- 2.19 The site is referenced within the Discounted Residential Sites Table, in Appendix 4 of the SHELAA 2024.

Emerging Draft Greater Manchester Spatial Framework (2016)

- 2.20 The site was previously considered as part of a wider strategic allocation (‘North Ashton-under-Lyne, ref: OA27’) as a suitable location to deliver a sensitive extension to the northern edge of Ashton-under-Lyne, benefitting from a draft housing allocation in the 2016 emerging draft Greater Manchester Spatial Framework (since renamed the PFE Plan). Whilst the allocation was ultimately not carried forward or adopted, due to a reduction in the need for Green Belt release in Greater Manchester at the time, the fundamental principles that underpinned the proposed allocation of Lees Road – as a deliverable and logical location for development – remain relevant, and offer an opportunity to address Tameside’s current and future housing needs.

Figure 2: Draft Allocation OA27, Emerging Draft Greater Manchester Spatial Framework (October, 2016)



3 CASE FOR ALLOCATION AND SITE DELIVERABILITY

- 3.1 This section provides an assessment of the case for allocating the site to the west of Lees Road for residential development, based on:
- a. An assessment of the “exceptional circumstances” that exist for the Tameside Local Plan to review the Green Belt Boundary;
 - b. An assessment of whether the site should be considered Grey Belt in the context of the new NPPF Paragraph 155;
 - c. A summary of the deliverability of the site including a review of the technical and environmental considerations, and its availability, suitability and achievability; and
 - d. A review of the potential benefits.

Exceptional Circumstances for Green Belt Review

- 3.2 Paragraph 145 in the NPPF states, “*Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans*”. Paragraph 146 continues, “*Exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means. If that is the case, authorities should review Green Belt boundaries in accordance with the policies in this Framework*”.
- 3.3 As set out in the comments in the previous section, it is considered that Tameside should plan for their minimum housing requirement as set by the standard method (1,124 dpa), which is significantly higher than their adopted requirement in the PfE (485 dpa). If Tameside plan for their minimum housing need, then there is a case for exceptional circumstances to review the Tameside Green Belt as part of the plan making process.

Greater Manchester Spatial Framework Green Belt Assessment

- 3.4 The most recent Green Belt assessment for Tameside was undertaken as part of the evidence base for the Greater Manchester Spatial Framework by LUC in July 2016. The purpose of this was to assess the extent to which land within the Greater Manchester Green Belt performs against the purposes of Green Belt. This Green Belt Assessment

was undertaken prior to the NPPF update and 'Green Belt' National Planning Policy Guidance ("NPPG") (February 2025), and therefore is not a suitable assessment of Green Belt land.

3.5 The NPPG sets out the key steps for a GBA, stating that, "*authorities will need to:*

- *identify the location and appropriate scale of areas to be assessed;*
- *evaluate the contribution each assessment area makes to Green Belt purposes (a), (b), and (d);*
- *consider whether applying the policies relating to the areas or assets of particular importance in footnote 7 to the NPPF (other than Green Belt) would potentially provide a strong reason for refusing or restricting development of the assessment area;*
- *identify grey belt land;*
- *identify if the release or development of the assessment area/s would fundamentally undermine the five Green Belt purposes (taken together) of the remaining Green Belt when considered across the area of the plan."*

3.6 In relation to the first bullet point, above, the NPPG proceeds to set out a number of "principles" to be considered. Central to these principles is a focus on ensuring that assessment areas are "*sufficiently granular to enable the assessment of their variable contribution to Green Belt purposes*" with "*local circumstances*" being an identified necessary consideration. It is on this point where the 2016 GBA is fundamentally flawed in relation to the land to the west of Lees Road, as the parcel within which the Site sits (ref: TS07), covers too broad an area preventing any consideration of local context (specifically the contained nature of the Site by virtue of the adjacent residential development, and strong tree and vegetation boundaries). This produced an inaccurate and unsuitable assessment of the Site against the Green Belt purposes, and necessitates an updated assessment in accordance with National Policy.

Grey Belt

3.7 Paragraph 155 of the NPPF, set out in the previous section, outlines the criteria in which development is not considered “inappropriate” in the Green Belt where:

- a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
- b. There is a demonstrable unmet need for the type of development proposed;
- c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of the Framework; and
- d. Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157.

3.8 This is relevant to inform plan making and decision taking, and in particular, to consider whether the Site could be defined as “Grey Belt”. A high level assessment of the Grey Belt credentials of the Site are set out as follows:

Criteria a) – we consider the Site to be a Grey Belt site in the context of the NPPF. It does not perform strongly against any of the purposes of the Green Belt (including purpose c and e), but in particular makes a less than strong contribution to purposes a), b) and d), based on the Green Belt National Planning Practice Guidance (“NPPG”) published on 27th February 2025.

- **Purpose A** – relates to checking the unrestricted sprawl of large built-up areas. The site adjoins the existing residential area to the south and is well contained by a strong tree belt to the north and west and by Lees Road to the east. If developed, the site would not result in an incongruous pattern of development as when viewed in the context of the Ashton-under-Lyne residential area, the development of the site would provide a logical and contained extension to the existing settlement. Therefore, it is considered that the Site would have a **moderate contribution** to Purpose A.
- **Purpose B** – relates to preventing neighbouring towns merging into one another. The site is located on the northern edge of Ashton-under-Lyne with the closest neighbouring town being Oldham to the north. The closest gap between the

settlements is around 1.5km, with Lees New Road forming a direct link between the two settlements. It is considered that the site only forms a small part of the gap between the towns and is able to be developed without the loss of visual separation between the towns, with natural landscape features and topography weakening the contribution further. Therefore, it is considered that the Site would have a **weak contribution** to Purpose B.

- **Purpose D** – relates to preserving the setting and special character of historic towns. The site would have make **no contribution** to Purpose D as it does not form part of the setting of any historic town.

Contribution to the Wider Green Belt

- 3.9 The site is a well-contained parcel on the northern edge of Ashton-under-Lyne with well defined boundaries, and therefore has limited functional contribution to the Green Belt in this locality. The contained nature of the site means that its development would have a very limited impact on the wider landscape character and openness of the Green Belt.
- 3.10 In summary, it is considered that the development of the site would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan (in accordance with Paragraph 155a).

A Deliverable Site

- 3.11 The NPPF seeks to ensure that deliverable sites are provide in appropriate locations to meet housing needs and support economic growth. To be considered deliverable, sites should be available, suitable and achievable and should be available to be brought forward within a realistic timeframe once the Local Plan is adopted.

Environmental and Technical Considerations

- 3.12 The site is considered to be wholly deliverable in the context of the NPPF and does not have any constraints that cannot be mitigated through a sensitive approach to masterplanning and design. The following provides a summary of the key considerations that have influenced an emerging Illustrative Masterplan for the site (which is included at **Appendix 2**):

Highways and Access

3.13 A Transport Technical Note has been produced by PTB Transport Planning Ltd to underpin the Illustrative Masterplan for the site. The assessment confirms that primary access to the site would be provided from Lees Road (with a secondary access from Whalley Grove); and that the site is fully deliverable, in terms of access, for residential development.

3.14 It concludes that:

“Suitable access can be achieved from all three frontages onto Lees Road and Whalley Grove, with the former accessed via ghost-island priority junctions with adequate visibility splays. A Transport Assessment will be carried out to support the planning application and will include capacity assessments of the site access and offsite junctions in the vicinity of the site.

At this stage, it is not expected that there will be a material impact across the wider highway network. The site is well served in terms of local bus services and local facilities with connections to Oldham, Ashton-Under-Lyne and Manchester.”

Flood Risk and Drainage

3.15 The Environment Agency’s Flood Map for Planning identifies the site as wholly within Flood Zone 1, indicating the lowest level of flood risk, and therefore would not constitute a significant constraint to development. Richborough will undertake more detailed flood risk and drainage work to underpin evolving designs for the site as the Local Plan is progressed.

Landscape, Ecology, and Arboriculture

3.16 A Landscape, Ecology and Arboricultural Overview report has been undertaken by Tyler Grange to understand the baseline landscape and ecology conditions.

3.17 The key findings of this work are as follows:

- **Landscape** – an initial landscape and visual assessment considers that the site can accommodate development without resulting in unrestricted urban sprawl or coalescence of urban areas. It also states that visual screening is provided by the

woodland vegetation at Holden Clough to the north and west. As a result of the containment provided by the surrounding vegetation and the local topography of the site, few visual receptors would be affected as a result of the development of the site, and appropriate mitigation measures could be taken to ensure any impact is minimal.

- **Ecology** – to safeguard any impact on the Holden Clough SBI, Tyler Grange recommend a minimum offset of 15m between the SBI boundary and any development would be required. A high-level assessment of on-site habitats and species has been undertaken, which has not identified any significant constraints that could not be mitigated through a sensitive approach to design and development. However, Richborough will undertake further ecological and BNG assessment work as the Local Plan is progressed to inform the masterplanning of the site.
- **Arboriculture** – an arboricultural assessment has identified key trees on the site. The emerging masterplan seeks to maintain the on-site woodland and important trees, and provides a sufficient buffer to protected woodland which is present within and adjacent to the site.

3.18 The Tyler Grange report concludes that the site is suitable for residential development based on a preliminary assessment, in respect of landscape and visual, ecological and arboricultural matters.

Archaeology and Heritage

3.19 A Heritage and Archaeological Technical Note has been produced by CgMs Consulting. This desk-based assessment of the site has established that there are no designated or non-designated heritage assets within the proposed development site.

3.20 The overall conclusions are:

- i. Whilst there is some potential for a minor impact on the heritage significance of a designated heritage asset within the study area, this is not considered to be in conflict with Policy C6 (Setting of Listed Buildings) of the Tameside Metropolitan Borough Council Unitary Development Plan Document (2004).
- ii. The desk-based assessment has established that the study site has a low to moderate potential for significant archaeological remains of all periods.

- iii. There is no evidence to suggest that the study site is likely to contain nationally important archaeological remains that would prohibit development or require preservation in situ. There are not considered to be any heritage constraints to development of the site.

Agricultural Land Classification

- 3.21 An Agricultural Land Classification (“ALC”) report has been produced by Soil Environmental Services to accompany this representation.
- 3.22 This report concludes that the site is of an ALC Grade 4, based upon the grading system established by the ‘Agricultural Land Classification of England and Wales’ (Guidance and criteria for grading the quality of agricultural land).
- 3.23 The Grading system allocates a number between 1 and 5, with Grade 1 land being ‘Excellent quality agricultural land’ and Grade 5 ‘Very poor quality agricultural land’. Grade 4, i.e. this site, is defined as being ‘Poor quality agricultural land’, with severe limitations which significantly restrict the range of crops and/or level of yields.
- 3.24 Based upon this ALC Grading, the development of this site for housing would not result in the loss of agricultural land of high value.

Illustrative Masterplan

- 3.25 Work to date has shown that there are no significant technical or environmental constraints that would impact the deliverability of the site and any adverse impacts caused by the development of the site could be appropriately mitigated. Richborough has appointed a professional design and technical team that will undertake further technical work to further underpin the masterplanning of the site and to support the Local Plan process.
- 3.26 An initial Illustrative Masterplan, included at **Appendix 2**, has been prepared to demonstrate how the site could be sensitively developed to accommodate around 280 homes in the context of the site’s high-level constraints. This early masterplan includes land to the east of Lees Road which is also within Richborough’s control and could come forward as part of a wider allocation of approximately 500 units. This illustrates one way in which the site could be brought forward for development and would be further

developed and refined as additional technical work is undertaken and in consultation with the Council and key stakeholders.

3.27 Some of the core design principles of the masterplan are as follows:

- A proposed (principal) vehicular access off Lees Road, with additional vehicular access from Whalley Grove;
- New pedestrian crossings points to link with existing residential streets;
- A Woodland walk and nature play trail and nature trail to benefit new and existing residents;
- An ecology corridor to support on-site habitats and the Holden Clough SBI;
- The retention of existing public footpaths set within new public open space;
- Retention of northerly views to wider landscape and towards Hartshead Pike;
- A mirroring of the existing linear residential frontage with offset to for sustainable drainage (at the assumed site low point);
- A new woodland and soft edge with adequate setbacks;
- Principal tree lined streets and looped vehicular routes;
- Outward facing development zones (providing natural surveillance);
- Tiered building patterns (and wider building offsets to address sloping topography of site);
- Linked central landscaped green corridors to connect distinct development parcels;
- Focal point spaces; and
- Higher density development 'core' and lower density development edges.

Deliverability and Key Benefits

3.28 The Illustrative Masterplan has the potential to deliver a range of economic, social and environmental benefits on the site. This section provides a summary of the deliverability

of the site and an assessment of the key benefits that allocating the site for development would bring to Ashton-under-Lyne.

A Deliverable Site

3.29 The NPPF seeks to ensure that deliverable sites are provided in appropriate locations to meet housing needs and support economic growth. To be considered deliverable, sites should be available, suitable and achievable and should be available to be brought forward within a realistic timeframe once the Local Plan is adopted.

3.30 Richborough is fully committed to promoting the site for development and consider that it could be brought forward immediately on adoption of the Local Plan to meet the housing needs of the Borough. The site could be brought forward individually for approximately 280 homes or as part of a wider allocation including land to the east of Lees Road for the joint total of approximately 500 homes.

3.31 In summary the Site is:

- **Available** – Richborough has entered into an agreement with the landowner to promote the site for residential development. Upon the grant of outline planning permission, the site will be sold to a preferred development partner who will be responsible for securing reserved matters approval and then commencing construction and delivering new homes at the earliest opportunity. Richborough has a proven track record of facilitating the delivery of high-quality housing developments on suitable and sustainable sites and can confirm that the site can be delivered for housing within the early phases of the Local Plan period. Richborough are strong advocates of a plan-led system and are committed to promoting land for residential development by engaging actively with local authorities, parish councils and other neighbourhood forums through local and neighbourhood plans.
- **Suitable** - the site is entirely suitable for a residential development for the following reasons:
 - It offers a highly accessible and sustainable location for development that would support a balanced spatial strategy and which could be brought forward early in the plan period following any allocation.

- It is a logical and natural extension to Ashton-under-Lyne that would deliver a sensitive extension to the urban area.
 - The Site should be considered as Grey Belt in any Green Belt Review, based on the NPPF and NPPF.
 - It is a site that was previously considered to be suitable for residential development (under draft Policy OA27) in the early emerging GMSF.
 - There are no environmental or technical constraints that would prevent the development of the site, subject to suitable mitigation and a sensitive approach to design.
 - It can deliver satisfactory vehicular access and has access to the strategic highway network via Lees Road.
- **Achievable** – the Illustrative Masterplan demonstrates how the site responds to its physical characteristics, technical considerations and surrounding context by providing a sensitive landscape-led scheme. An assessment of the site constraints illustrates that delivery of the entire site is achievable, and a professional team of technical experts will support the detailed design of the site moving forward. Where any potential constraints have been identified, Richborough has considered the necessary mitigation measures and required investment in order to overcome any deliverability barriers. Richborough has reviewed the economic viability of the scheme in terms of the land value, attractiveness of the locality, level of potential market demand and projected rate of sales in Ashton-under-Lyne; as well as the cost factors associated with the site including site preparation costs and site constraints. In addition, Richborough has extensive experience working with nationally significant development partners, as well as SME housebuilders. Developer partners who have built out Richborough sites include Bellway, Barratt David Wilson, Bloor, Castlegreen, CALA, Miller, Mulberry, Kier, Lion Court, Persimmon, Taylor Wimpey and Vistry. On Richborough’s sites, the average completion rate per sales outlet is a combined rate of 50 dpa for both market and affordable housing provision. Richborough confirms that the development of the site is economically viable, deliverable and achievable in accordance with the NPPF.

Key Benefits

3.32 The allocation of the site will support new housing in an appropriate location and ensure that a quantity, quality and mix is provided to support the economic growth of Tameside. The delivery of the site will provide significant benefits to the Borough and to Ashton-under-Lyne. These are summarised as follows:

Economic Benefits

3.33 The development of the site will have significant economic benefits, both from its construction and occupation. Key economic benefits may include:

- Generating investment during the construction phase of development through construction cost, FTE construction jobs and an increase in GVA.
- Providing long term occupational / operational benefits including new resident expenditure, attracting new residents to TMBC, generating flow on and supported jobs and, overall, generating increased economic output in the Borough.
- Generating significant revenue for the Local Authority, with a development of new homes generating revenue in Council Tax revenue, New Homes Bonus and through Section 106 contributions.
- Underpinning the catalytic growth opportunities in Tameside by providing the type, quality and spatial distribution of homes in the Borough that will allow it to capitalise on its locational advantages as part of the Greater Manchester conurbation.

Social Benefits

3.34 The delivery of the site will have clear social benefits for existing and future residents, in terms of providing better choice, improving access to amenities and meeting a variety of identified housing needs. The key social benefits include:

- Delivering high quality market homes to meet the needs of the Borough's existing and future employees, supporting the future growth of the Borough.
- Providing viable and deliverable affordable homes to address the Borough's affordability crisis and support the housing of key workers and other first time

buyers. The site would provide, at a minimum, a policy compliant level of affordable housing, with potential uplifts to meet the latest NPPF's 'Golden Rules'.

- Delivering new and accessible multifunctional open spaces, amenity spaces and green infrastructure to benefit existing and future residents.

Environmental Benefits

3.35 The development of the site has the potential to uplift the biodiversity, accessibility and overall enjoyment and environmental value of the site. In addition, the site has the potential to be an exemplar in sustainable design and construction. Key environmental benefits include:

- The site will create new habitats for a range of species and will seek to provide a biodiversity net gain on-site.
- The provision of multi-functional green infrastructure and open space that will generate significant recreational benefits for existing and prospective residents, including a new woodland walk and nature trail.
- The protection and enhancement of existing features of the site that add value, including the Holden Clough SBI and mature trees and hedgerows.
- The promotion of and commitment to new cutting edge net zero technologies by Richborough.

Summary

3.36 This section has set out the case for the allocation of the site in the context of national planning policy, the Council's housing need, the inherent deliverability of the sites and the benefits that could be generated.

4 CONCLUSIONS

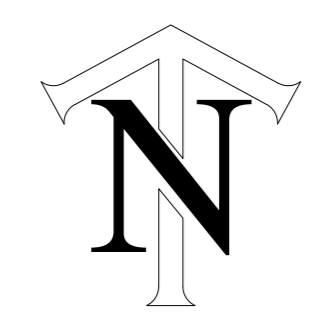
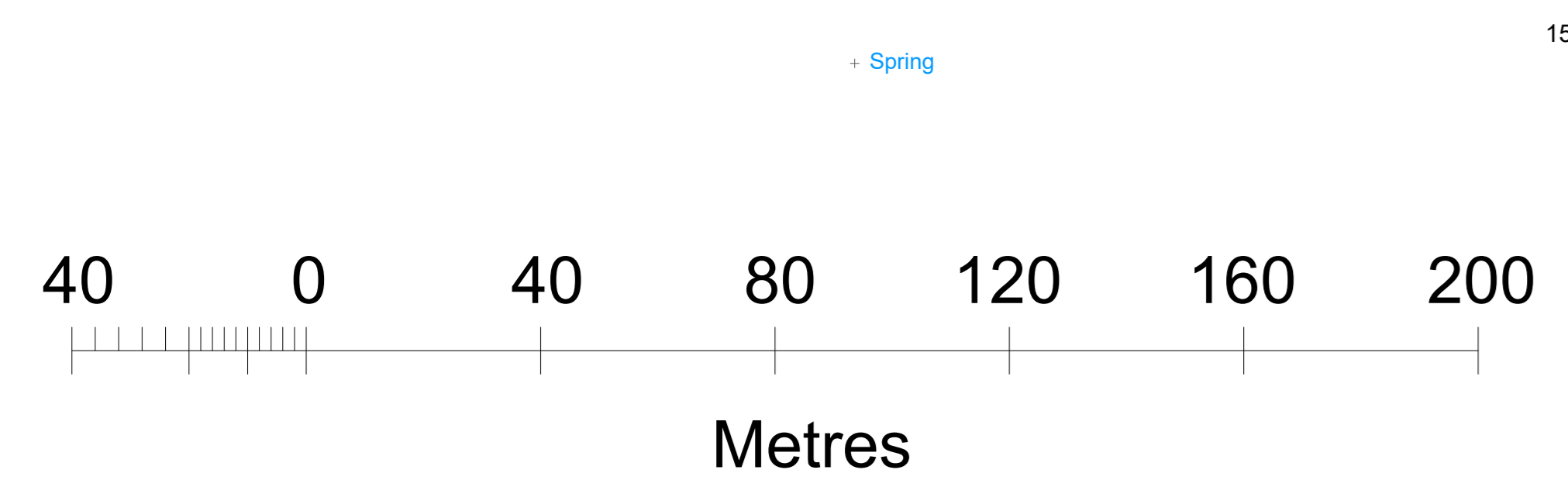
4.1 In summary, Richborough considers that the new Local Plan provides a once-in-a-generation opportunity to plan for the future of Tameside and deliver a pro-growth approach which will deliver sufficient homes to meet its future housing requirements, address the housing crisis for TMBC's residents, alleviate affordability issues and support economic growth during the next 15-20 years.

4.2 Richborough's key recommendations are as follows:

1. The Council should **plan for a significantly higher housing requirement (of a minimum of 1,124 dpa)** in line with the national policy context. Failure to do so will result in an out of date plan in less than five years, that will open up the Borough to an appeal-led approach to planning during the proposed plan period (i.e. the opposite of a 'plan-led approach').
2. Due to the scale of the housing requirement and the lack of sites within the urban area to meet this need, **a strategic review of the Green Belt should be undertaken**; to identify suitable sites that could meet the future needs. This would complement the strategic allocations identified in the PfE and enable the Borough to meet its own needs in the context of the existing and emerging housing requirement.
3. As well as allocating sufficient land, the Council should also **consider identifying safeguarded or reserve sites**, to ensure the Local Plan has the flexibility to meet its future needs, both within and beyond the plan period.
4. **The site to the west of Lees Road, Ashton should be considered for allocation in the emerging Local Plan as a site that is available, suitable and achievable, and as Grey Belt site if a review of the Green Belt is undertaken**, in the context of the NPPF.

4.3 Richborough respectfully request that the site and the information contained in these representations is considered as the emerging Local Plan and site assessment process is progressed. Richborough would welcome engagement with the Council on these representations, and would be happy to facilitate a site visit if required, and this can be arranged by Asteer.

APPENDIX 1 – SITE LOCATION PLAN



Notes:
This overlay is based on current OS base data.

KEY:
West Parcel Application Boundary
c.15.20ha

Revision:

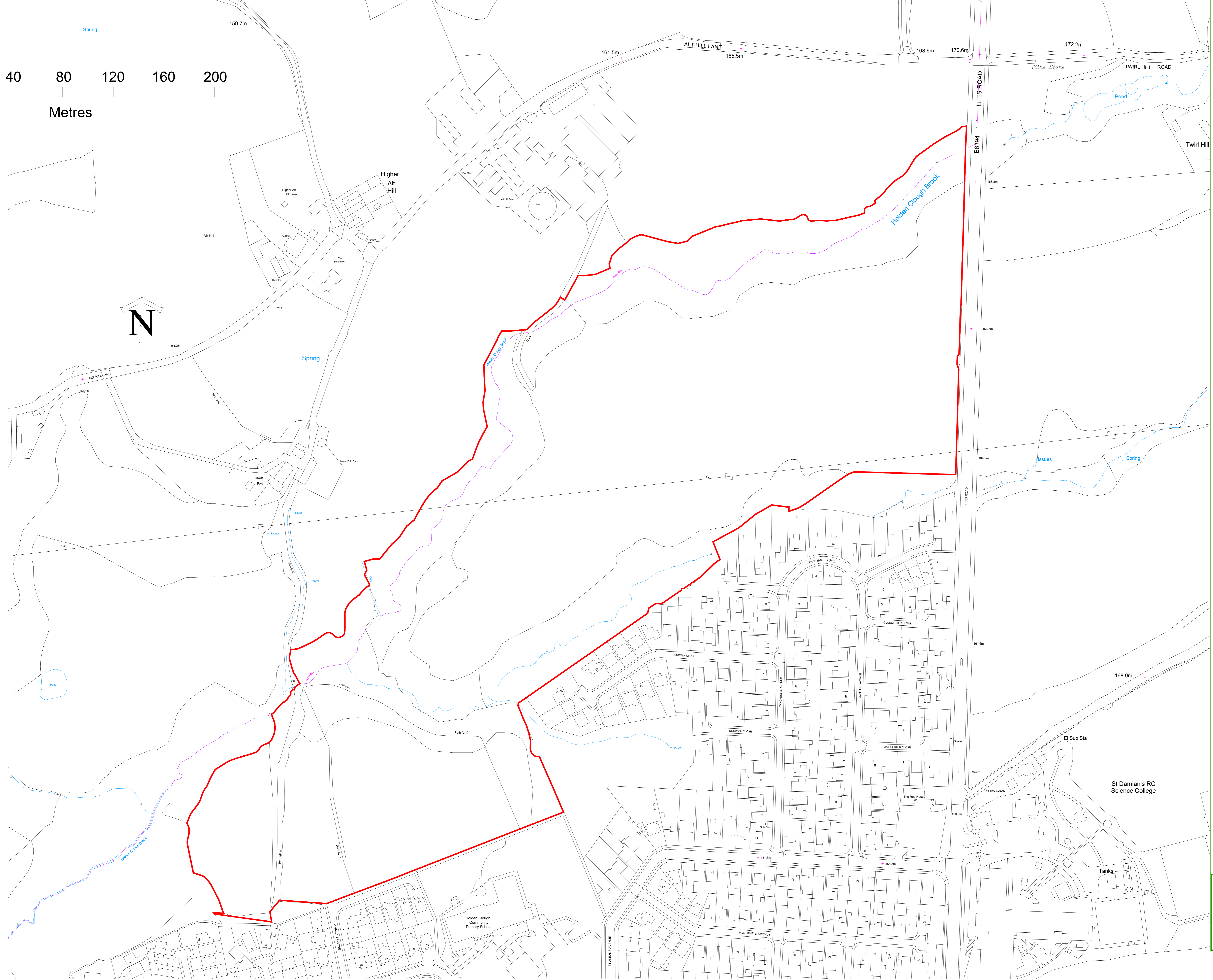
Birmingham Second Floor, Waterloo House 20 Waterloo Street Birmingham, B2 5TB Tel: 0121 633 4639	London 8 St James's Square London, SW1Y 4SL Tel: 02030 111 353 Tel: 0121 633 4639	Project Number: .
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info@righboroughstates.co.uk

Land off Lees Road,
Ashton Under Lyne (West)

Application Boundary Plan

Drawn date: 28/05/2025	Drawn by: ES	Scale: 1/ 1000 @ A0
Drawing number: R-LRAUL-ABP-02	Revision: .	

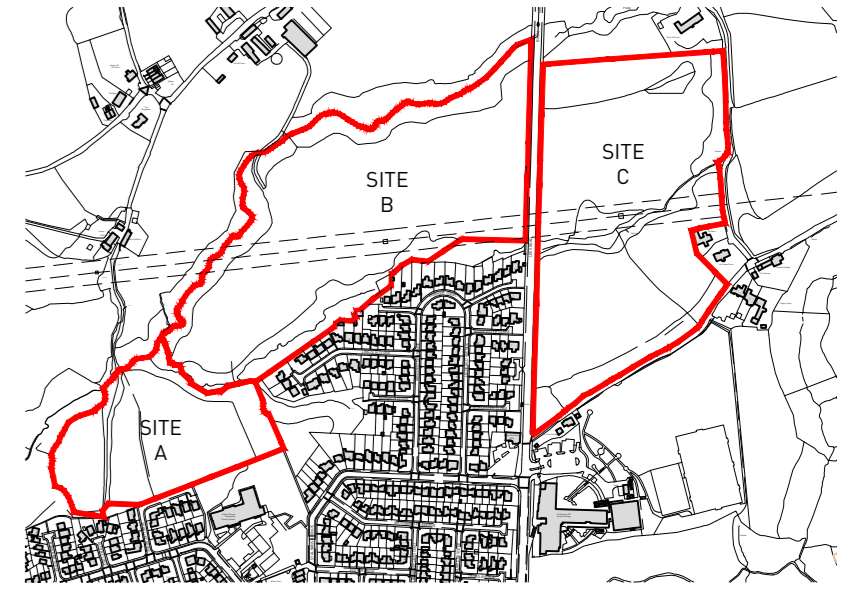


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APPENDIX 2 – ILLUSTRATIVE MASTERPLAN



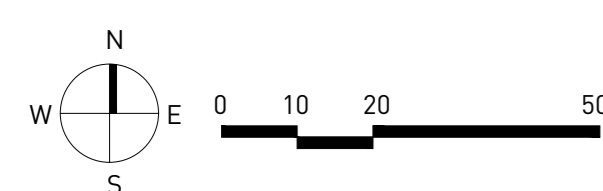
SITE AREAS:
 SITE A: 9.2 ACRES / 3.72 HECTARES
 SITE B: 24.88 ACRES / 10.07 HECTARES
 SITE C: 22.95 ACRES / 9.29 HECTARES



- KEY**
- Overall site location
 - 57.03 Acres / 23.09 Hectares
 - Proposed residential development
 - Overall public open space 28.09 Acres / 11.36 Hectares
 - Existing landscape
 - Existing woodland
 - Existing woodland
 - Indicative sustainable drainage
 - Public footpath network
 - Key pedestrian linkages

- KEY DESIGN PRINCIPLES**
1. Proposed (principal) vehicular accesses off Bristol Road;
 2. Proposed vehicular access off Whalley Grove;
 3. Pedestrian crossings points to link with existing residential streets;
 4. Woodland walk and nature trail;
 5. Ecology corridor;
 6. Existing watercourse;
 7. Natural play trail;
 8. Existing public footpaths retained in public open space;
 9. Northerly views to wider landscape;
 10. Views towards Hartshead Pike;
 11. Mirror existing linear residential frontage with offset to for sustainable drainage (assumed site low point);
 12. New woodland and soft edge;
 13. Existing overhead cables and assumed 30 metres (overall easement);
 14. Street pattern orientated part screen views of pylon towers;
 15. Principal tree lined street and looped vehicular route;
 16. Outward facing development zones (providing natural surveillance);
 17. Tiered building patterns (and wider building offsets to address sloping topography of site);
 18. Linked central landscaped green corridor to connect development sites;
 19. Focal point spaces;
 20. Existing stone wall to be retained;
 21. Higher density development 'core';
 22. Lower density development edges;
 23. Direct frontage access off Whalley Grove;
 24. New housing frontage to overlook existing school; and
 25. Continue existing Burham Close building line.

NOTE:
 This drawing is for indicative purposes and subject to detailed design and site survey



LAND TO THE EAST AND WEST OF LEES ROAD, ASHTON-UNDER-LYNE PROPOSED INDICATIVE MASTERPLAN

