

Places for Everyone Representation 2021

Family Name	Cullinane
Given Name	Danny
Person ID	1286911
Title	Stakeholder Submission
Type	Web
Family Name	Cullinane
Given Name	Danny
Person ID	1286911
Title	Our Strategic Objectives
Type	Web
Our strategic objectives - Considering the information provided for our strategic objectives, please tick which of these objectives your written comment refers to:	<p>6. Promote the sustainable movement of people, goods and information</p> <p>7. Ensure that districts involved are more resilient and carbon neutral</p> <p>8. Improve the quality of our natural environment and access to green spaces</p> <p>10. Promote the health and wellbeing of communities</p>
Soundness - Positively prepared?	NA
Soundness - Justified?	NA
Soundness - Consistent with national policy?	NA
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>The specific proposals for Godley Green Garden Village (GGGV) and at Apethorn in Tameside require huge amounts of infrastructure to support the building of houses and associated fixtures. At no point has TMBC been able to answer how the construction of these sites would be carbon neutral, and when asked they only refer to vague outlines of how the buildings would possibly be carbon neutral. And given the extended timescale of development, construction will still be ongoing past when the council's own policy claims everything will be carbon neutral. Their proposals break their own policies in this regard.</p> <p>The site for GGGV is currently Greenbelt designated. The only way they can see that the planned site would be effectively maintaining its level of biodiversity is to include a further site south of the A560 that would be disconnected from the main site. Thus the quality of natural environment will be deliberately diminished at Godley Green and without providing easy access to the new site. Previous (very recent) single planning applications at Godley Green have been rejected because of their expected impact on the local aspects, so it is not clear how 2,300+ homes would not have a significantly greater impact in this regard.</p> <p>Finally, with regards to my personal wellbeing, the GGGV proposal sets out construction all around me for over 17 years, with no plans for mitigation of this intrusion of noise, dust and disturbance having been provided at any</p>

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	stage since the proposals first emerged. There has been little evidence of active thought of the impact on current residents. This cannot be seen as being effectively looking after my wellbeing as an existing taxpayer.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	<p>If development is to take place, it has to be at a smaller scale in keeping with the current patterns of density in the specific local areas. Any new developments may need to be spread across the borough to avoid overloading the south with the associated impacts on the wellbeing of local nature and people.</p> <p>It is hard to see how, once greenbelt designation of a site is removed on a large scale, how any future site given greenbelt designation can be seen to have any substantial legal protection. Therefore, not changing the current greenbelt designation would seem to be the only way to maintain protection, which therefore requires a review of how to approach housebuilding in focusing on brownfield first, and recognising the numbers involved for Tameside do not require losing greenbelt at this stage.</p>
Family Name	Cullinane
Given Name	Danny
Person ID	1286911
Title	JP-G 6 Urban Green Space
Type	Web
Soundness - Positively prepared?	NA
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	NA
Soundness - Effective?	NA
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	I make a comment here as I cannot see where I can express all my reactions to your proposals in a way that is meaningful to me, not restricted to answers that suit your agenda. Please see my answers to the next box below that raise ethical and human responses to these issues.
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	<p>You say this:</p> <p>"While our areas of open countryside are enormously important, many of us more frequently encounter urban green spaces on a day-to-day basis. Such spaces are not always natural - often containing recreation facilities, such as playgrounds or sports pitches.</p> <p>Our urban green spaces are essential to our way of life, making a vital contribution to our mental and physical health, and our overall quality of life. In busy, urban areas they can offer a moment of tranquillity and provide people with opportunities for recreation, social interaction, and to connect with nature.</p> <p>Significantly, they will become increasingly important as a result of climate change, helping to cool overheating urban areas, manage flood risk and</p>

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	<p>enable wildlife to adapt. Other important environmental functions include the ability to mitigate air pollution and help manage water quality."</p> <p>This answer is an emotional rather than a legal rational or technical response. Whilst your consultation seeks to restrict those, you need to recognise that people have an emotional connection and bond to where they have chosen to live, and that you seek to change forever. The approach to this consultation is indicative of the deliberate technocratic and unfeeling way in which proposals have been made and then community engagement has been undertaken. It is top down, reactive and unfeeling.</p> <p>I cannot find any other place in this exercise where I can express it, so I do so here.</p> <p>I live in one of these areas that is also designated Greenbelt. You wish to take it away from me and others locally. Yet in doing so, in all the time you have had your proposals on the table you have not made any single proactive or positive approach as to how you will enhance my local environment, my quality of life, or my wellbeing.</p> <p>It has taken over three years just to get an acknowledgment of the distress you have caused before even a belated apology was given. It is not good enough to treat people like this, and yet you wish to inflict this for a further 15+ years on one small corner of a borough.</p>
Family Name	Cullinane
Given Name	Danny
Person ID	1286911
Title	JPA 31: Godley Green Garden Village
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	No
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>Firstly, if PfE is seen as being able to be the substantial, logical and legitimate successor to GMSF, then all previous comments relating to the proposals that have been carried over should also still be legitimate. Therefore, I refer you to my (and the many others) comments on each proposal as still having validity.</p> <p>Godley Green Garden Village (GGGV) is not justified as it is building on existing Greenbelt. This seems directly at odds with the Places for Everyone headline statement "protecting Green Belt land from the risk of unplanned development". and other statements such as "The plan focuses on making the most of our brownfield sites, prioritising redevelopment of town centres and other sustainable locations".</p> <p>The proposals do not seem to provide for sufficient very special circumstances to build on Greenbelt, especially given the recent rejection by planning inspectors of other planning proposals on the site that were not from TMBC.</p>

There has been no effort to consider what will happen to current site users who will be displaced, as an example horse users and stabling. Given the long time scales that have already been in place, surely clearly stated proposals should already be in place as to what would happen if the GGGV goes ahead. That they are not indicates a complete lack of thought on or interest in the wellbeing of current residents and site users.

Lack of appropriate notification and consultation with existing residents

There has been an ongoing lack of proactive consultation with local residents by the council and others who are seeking to propose the scheme.

The most recent example of this sustained pattern of a lack of effective communication are the Places for Everyone signs that were erected around the site notifying local people. These had minimal information to help people understand the derisory map and did not indicate that there is an associated site to the south of the A560 that has to be included for offsetting biodiversity impacts. The signs also did not show that there are internal boundaries to the proposed changes in green belt designation, and so have not given the full picture of the proposal. They feel deliberately inaccurate, and this is after previous signs for the GMSF were indicated that they had included similar mistakes.

On a Duty to Cooperate, the arguments proposed by some councillors against some proposals in other areas abutting the borough are the same ones conveniently ignored with regards to the GGGV proposals: for example the impact on residents, the destruction of local wildlife etc. It seems that there is a failure to develop a coherent set of principles that could apply across the whole borough (and beyond), and not to where it suits local political arguments.

Local consultation on this whole process has been poor, from its first iteration announced on a Facebook page by the local MP onwards, primarily relying on online means and not actively seeking to engage local people who do not use the internet. Specifically, there has been no written notification about this PFE consultation to residents whose properties are directly impacted by these proposals.

GGGV is supposed to fulfil Garden Village principles. It does not. It is urban infill, that will remove any separation of Godley Green, Godley and Hattersley. It is not proposed to be self-sufficient (as new Garden sites are meant to be), with increasing claims being made on how it will economically benefit local areas such as Hyde and Hattersley that have been under-invested in in recent years.

Whilst great store is placed in the nearby rail links to facilitate movement, the recent (2020) Greater Manchester South east rail corridor study show that there will not be enough increase in rail infrastructure to cope with the expected number of people. This therefore would mean that the road network would need to be able to cope, but the plans for the Mottram Bypass have not progressed, and it is indicated that the road viaduct between Gee Cross and Hattersley on the A560 would need replacing soon. Of course, the combined road traffic of 2300+ houses here, and the South of Hyde proposals, mean the A560 is likely to become gridlocked. All of this of course again impacts on the idea of carbon neutral developments.

There is no indication in these developments of how Climate Change is being addressed. Given that TMBC has declared a climate emergency as a key policy, and that there are other statutory duties on tackling climate change in Local Plans, nothing has been changed in the GGGV proposal to recognise this.

Given the failure of TMBC to even be able to get existing landowners to agree a consensus on the way forward, and the fact they failed to meet the extended timescales for the Homes England funding grant they accepted to deliver the initial infrastructure for GGGV, there is no evidence that such a

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	large and complex project could be delivered within the timeframes given. And any extension beyond that for construction further exacerbates the wellbeing of local residents
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	<p>Given the inability of TMBC to meaningfully and proactively develop consultation with local residents, let alone a working relationship with the landowners they need to push forward their proposals, it is not for me as a single taxpaying resident to come up with all the solutions that they have failed to do over the several years of this proposal.</p> <p>Perhaps using Ockams's Razor as an approach may make this the simplest way to deal with this. Thus, to make this section of the plan legally compliant and sound the easiest and most effective approach is to not build on Greenbelt in GGGV or the South of Hyde but to build on brownfield first, and to regularly assess housing needs as the local and national economy is re-developed, and greater understanding of Climate change and environmental impacts is realised.</p>
Family Name	Cullinane
Given Name	Danny
Person ID	1286911
Title	Tameside - Green Belt Additions
Type	Web
GBA Tameside - Tick which Green Belt addition/s within this District your response relates to - then respond to the questions below	<p>Tameside GBA31 Fox Platt, Mossley</p> <p>Tameside GBA32 Manor Farm Close, Waterloo, Ashton-under-Lyne</p> <p>Tameside GBA33 Ridge Hill Lane, Ridge Hill, Stalybridge</p> <p>Tameside GBA34 Cowbury Green, Long Row, Carrbrook, Stalybridge</p> <p>Tameside GBA35 Woodview, South View, Carrbrook, Stalybridge</p> <p>Tameside GBA36 Yew Tree Lane, Dukinfield</p> <p>Tameside GBA37 Broadbottom Road, Broadbottom</p> <p>Tameside GBA38 Ardenfield, Haughton Green, Denton</p> <p>Tameside GBA39 Cemetery Road, Denton</p> <p>Tameside GBA40 Hyde Road, Mottram</p> <p>Tameside GBA41 Ashworth Lane, Mottram</p> <p>Tameside GBA42 Horses Field, Danebank, Denton</p>
Soundness - Positively prepared?	NA
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	NA
Soundness - Effective?	Unsound
Compliance - Legally compliant?	NA
Compliance - In accordance with the Duty to Cooperate?	NA
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to	<p>The approach of replacing actual Greenbelt loss with "additional" Greenbelt is a deliberately misleading and unethical approach.</p> <p>Given that Greenbelt status is so seemingly easily discounted on the Council"s whim and desires when it pleases them, then there is no guarantee that any new designation would be safe from any future development. The whole PfE proposals are thus undermined by this approach.</p>

comply with the duty to co-operate. Please be as precise as possible.

Let's also understand that there is a high level of cynicism here in the proposals. Existing houses at the GGGV site are being deliberately maintained as Greenbelt whilst the rest of the site around them is losing its Greenbelt designation (although this is not shown on any diagrams for PfE). What is the justification for this approach? When asked no-one at TMBC or its representatives have been able to provide a coherent response. If it suits the proposed developer, it is okay to change the status is how this comes across.

The idea of additionality is also flawed. These are not additions but poor substitutes.

Some of the proposed sites are not publically accessible, or are already such greenfield sites that having Greenbelt status will not materially alter things. They could nbe made Greenbelt sites in addition to what is already there, not to look to replace the loss of what exists now. Sites have been previously proposed until challenged by TMBC that were motorway embankments!