

Places for Everyone Representation 2021

Family Name	Elliott
Given Name	Barry
Person ID	1287638
Title	Stakeholder Submission
Type	Web
Family Name	Elliott
Given Name	Barry
Person ID	1287638
Title	JPA 31: Godley Green Garden Village
Type	Web
Soundness - Positively prepared?	Unsound
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.	<p>Firstly, I believe the PFE completely overlooks the purpose of Green Belt (as opposed to other green areas of land), that being defined as "The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."</p> <p>Secondly, I do not believe that the numbers underpinning the PFE support an "exceptional circumstance".</p> <p>NPPF policy 2018 (Section 13, paragraph 140) states that "Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans."</p> <p>Thirdly, even if you accept (which I don't) the number of houses necessary to meet the future housing needs... the "character" of that housing has been completely ignored. With Tameside Council favouring aspirational family housing which will increase council tax revenue instead of the actual housing needs as set out by the data.</p> <p>I wholeheartedly support the idea of building houses. House prices are disproportionately high now due to a lack of supply. Whilst I pity those people who could be caught in negative equity, I feel the solution for our country is to over supply houses and so drive prices back down. Where I disagree is the current policy to that projected demand is limited to current geographical boundaries - the end result of which is a much larger growth projection in already existing urban areas and ever increasing population density and urbanisation and with it, increased pollution. Whilst it is not the remit of this review, I would urge the Planning Inspector and Secretary for State to look towards Ebenezer Howard's ideas for Garden "Cities" that led to the creation of areas like Kimmel Bay, Milton Keynes, St. Helier, Telford and Welwyn Garden City. An no, calling something a "garden village" is not the same</p>

thing - especially when it proposes putting a large housing estate between two other large housing conurbations.

To address my first point, GMCA seem to feel that Green Belt is just a number and that arbitrarily adding "Green Belt" to specified plots of land somehow balances the deletion of green belt at Godley Green. Removal of the green belt status of this land will effectively give the go-ahead for the GGGV estate which will join the existing urban areas of Gee Cross, Hattersley and Godley Village. Whilst Godley Village and Gee Cross are already adjacent - this green belt zone holds Gee Cross and Hattersley separate... which, I guess, is why it was originally designated as Green Belt. Adding some random green belt plots around Tameside does not feel to be promoting either "openness" nor "permanence" when it removes a buffer of urban sprawl between Gee Cross and Hattersley. At the very least, I would ask why these other parcels of land should be a designated as green belt, since that effectively reducing the amount of land available for building upon - if that land is available, why should Godley Green lose it's green belt status?

But back to the meat of my argument, my second point... The numbers just don't support an "exceptional need". For a number of reasons.

Housing need is derived from a complicated formula based on population growth, with some consideration given to economic aspirations. Each change, year on year in the population numbers and makeup will have a knock on effect to the following year and so on and so forth.

When the original GMSF was proposed, it used the 2012 ONS population projections (247,200 by 2035 for Tameside). When the draft proposal was published in October 2016, it was updated to use the 2014 figures (236,500). That drop in the population projection for Tameside led to reduction in the projecting housing need.

Despite the GMSF being reworked and renamed, the GMCA have chosen to ignore the 2016 ONS data which was published in 2018, in plenty of time for the final 2019 revision of the GMSF/PFE. Again, the population projection fell (to 233,800) for Tameside.

Another anomaly with the figures is the massive reduction in "brownfield" sites within the Tameside SHLAA between the 2016 GMSF and the 2019 PFE. Between the two, the government proposed the creation of a formal "Brownfield Register" at the local authority level. Except the brownfield register had strict criteria which meant that not all brownfield sites listed in the Tameside SHLAA could be included on the brownfield register. The numbers seem to point to the brownfield register being used for PFE purposes and the previously available sites not included in that list were dropped rather than reclassified - reducing the list of apparent available future building sites and therefore increasing the apparent housing stock shortfall.

I would also criticise the NPPF guidance to artificially inflate the housing demand need for people aged 25-44 (headship rates). The numbers being bolstered for a perception that adults currently living with parents MAY find themselves in a future economy where house prices become more readily affordable. Whilst a laudable, aspirational goal - it is also artificial in nature. I would question whether it's artificial nature would qualify as "exceptional need", since it inflates the apparent housing numbers so much.

My third point was the the proposed "Godley Green Garden Village" does not meet the demographic need as the data dictates.

Unfortunately, I need to rely on the 2016 draft GMSF data - which is somewhat out of date... as the GMCA haven't published the data in as much detail since then. Whilst the data is older, I believe it demonstrates my case and can't have changed so significantly since then as to overturn my overall point.

I am relying on a spreadsheet called "Higher Household Formation - Details HHLDS.xls" (datasheet "Tameside") published as part of the October 2016 draft GMSF. Within it, it breaks down the housing demand after the 25-44 headship totals have been adjusted upward. At that time, the 2015-2035 household projection was for an additional 13,476 extra homes (though due to some extra calculation, that number rose to a final figure of 13,600 for Tameside). Since then, the number has been reduced and some of that demand has been passed to other authorities.

My issue with the current plan is the demographic breakdown of those additional (was 13,476) homes.

The spreadsheet broke down the demand into specific ages for the head of the household (bands, 0-14, 15-24, 25-34, 35-44, 45-54, 55-59, 60-64, 65-74, 75-84, 85+) and household makeup ("One person: male", "One person: female", "Couple: no children", "Couple+Adults: no children", "One child", "Two children", "Three+ children" and "Other Households").

Primarily... 11,274 of those 13,476 homes were projected as being needed for people aged 65+ (83.66%). Of those, 3,657 (27.14% overall) will be people aged 65 living alone. 6,331 (46.98%) will be at least one person aged 65+ living with another adult but no children. Only 345 (2.56%) homes for those aged 65+ living with children. With 941 (6.98%) "other" homes for people aged 65+.

The proposal for Godley Green Garden Village which is a substantial part of Tameside solution completely overlooks that demographic breakdown and as such does not meet the future needs of the area.

Whilst I accept my numbers are out of date, I can not accept that 83.66% of future demand being needed for what might be consider "for the elderly" suddenly became 40%+ large family homes. Especially when practically a third of that number was for people living alone.

Additionally, I find it telling that despite each iteration of the GMSF/PFE reducing Tameside's housing need throughout the process - Tameside's plans for GGGV has remained fixed at using the WHOLE site for a total of 2,350+ new homes. I think it highly likely that following the current plans, we could reach 2035 and the whole of Godley Green has been built upon, yet a significant portion of the brownfield sites remain unused.

All of which is objective viewpoints.

Subjectively, I would also point out that there is no opportunity to widen any road at the Gee Cross end of the estate - leading to a further increase to the bottleneck for cars there. Even the proposed Mottram Bypass which may have alleviated congestion at the Hattersley end of the estate has been put on hold again. Such a large estate will only increase problems with demand for secondary school places (I believe a tiny primary school is tentatively included), hospital places and all other infrastructure.

And whilst GMCA and Tameside have said their are in talks with rail operators, I have 2nd hand knowledge that the rail operators have already stated that there isn't any opportunity to expand the rail platform at Godley Green and even if there were, there wouldn't be any possibility of similar expansion of other stations on that track. The final nail in the coffin for "better access to rail services" is that the rail operators have also said they wouldn't have any room at the railway yard for the longer trains necessary to make Godley Green station viable, given that the trains that use that track are already frequently full at that stage of their journey.

In summary, GGGV is only viable if the land is reclassified away from green belt, which is needed to separate the Gee Cross area of Hyde and the Hattersley Estate, Mottram. I don't believe the numbers justify releasing any of the land. The current numbers, even if taken at face value do not support

	<p>releasing all of the land. Were it to go ahead, it definitely wouldn't meet the nearly 83% demand for housing for people aged 65+.</p> <p>Clearly Tameside want their flagship project, ahead of any proposed building on brownfield sites to raise council tax revenue. "We need more money" is not exception need either.</p>
<p>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>	<p>Look closely at the numbers, even a small decrease in the current numbers for whatever reasons would negate the need for the green belt status to be brought into question.</p> <p>Review the list of brownfield sites in recent updates to the Tameside SHLAA, in light of the brownfield register's restrictive criteria. I think some sites were dropped in error. Those extra sites may make GGGV unnecessary.</p> <p>Write a clause into the Local Plan that even if Godley Green were reclassified, that house building there must be proportional to the use of Brownfield sites elsewhere within Tameside (to avoid GGGV being used in it's entirety long before viable brownfield sites are taken up.</p> <p>Only release a portion of the Godley Green site from Green Belt and leave the remainder in it. Last time I looked, I believe the shortfall was only a little over 1,1000 homes in Tameside. Even that feels high, based on my other feedback. But if that number remains the case, then reclassify enough land to meet that shortfall, rather than the full 2,350+ home wishlist.</p>