

# **Revised GMSF Consultation**

## **- Closes 23:59 on 18<sup>th</sup> March 2019**

### **“A Once In a Generation Opportunity”**

We've designed this information to help you respond to the revised GMSF consultation in a simpler format to that provided in the online version.

- We believe that if you complete your comments online, you are unwittingly drawn into agreeing with the general premise of the GMSF plan, namely that it's the best or only way to solve the housing and jobs problem.

#### **Commenting via the online portal**

- If you choose to complete the online consultation, go to: [www.gmconsult.org](http://www.gmconsult.org)
- Firstly, fill in the information about yourself, *which you must do or your comments will be invalid.*
- Then complete any or all of the following sections as you wish and press 'submit'.

#### **Commenting via letter or email**

- Alternatively you can reply by letter or by email, in your own words, which is what we're suggesting.
- **You are not obliged to use the information we're suggesting and can use your own wording if you prefer.**
- **You must complete** the information about yourself or your comments will not be accepted.
- Once completed, you can **email** your comments to: [planningandhousing@greatermanchester-ca.gov.uk](mailto:planningandhousing@greatermanchester-ca.gov.uk) or **post** them to: Planning Team Consultation GMCA, Churchgate House, 56 Oxford Street, Manchester M1 6EU

It's all too easy to object to the current consultation for our local area, the rest of Rochdale Borough and all of Greater Manchester by simply saying “we don't want it”. **However, you are more likely to influence any of the proposed changes by**

**suggesting some alternatives.** For this reason, there is space at the bottom of the comments letter where you can add your own ideas/solutions. Or you can include these on a separate sheet. Please write something and try to be positive so that your ideas are included and really count towards the consultation.

**Please complete a separate letter for each member of your family (that's anyone over 13 years old). Wherever possible provide a different email address for person.**

By submitting your comments on the GMSF Consultation you are making a positive contribution to the future of the place where you live and Greater Manchester as a whole.

We also believe that it's important to try and save the Greenbelt across Greater Manchester from unnecessary development.

Development in the Greenbelt across Greater Manchester as suggested in the revised GMSF, will not provide solutions, but will only make things worse.

**Remember that when sending in your comments you must include your full name and address and an email address or phone number if you have one.**

This is so that your comments can be recorded by the GMSF team collating responses. **If you do not provide contact information, your comments will not be included in the process.**

The GM Mayor Andy Burnham has said that he, his colleagues and the ten local Councils across Greater Manchester, welcome your comments to their revised GMSF plan and are willing to take your suggestions into consideration.

So let's make sure we tell Andy & Co through our comments, what we think and hope they really do take note and come up with much more acceptable options later this year when they'll consult again.

Name \_\_\_\_\_

Address1 \_\_\_\_\_

Address2 \_\_\_\_\_ Postcode \_\_\_\_\_

Email address \_\_\_\_\_ Telephone number \_\_\_\_\_

Dear Sir/Madam,

I write with reference to the revised GMSF consultation – 14<sup>th</sup> January 2019 to 18<sup>th</sup> March 2019.

**I find the proposals unacceptable as they currently stand.** Please include my comments in this consultation process. I agree to you using my contact details in order that I can be keep informed.

My comments apply in particular, but not exclusively, to the following allocation sites of the revised GMSF: GMA 2 Stakehill; GMA 1.1 / GMA 1.2 / GMA 1.3 Northern Gateway; GMA 29 Trows Farm; GMA 21 Thornham Old Road; GMA 3 Kingsway South.

My comments also relate more generally to the revised GMSF as a whole.

1. **I do not think** that my local council or the GMCA have done enough to make me aware of the proposals contained in the revised GMSF.
  - a. **I believe** that my local Council, Rochdale, has not conformed to its legal duty under the 'Statement of Community Involvement'.
  - b. **I also believe that the GMCA** has relied too heavily on the ten local Councils to disseminate information to Greater Manchester residents and thus by implication has fallen short of its implicit duty of community involvement.
2. The Overview document section 'Proposed Additional Site (Allocations)' states that "...most new development over the plan period will take place on currently identified sites within the urban area". This statement is directly at odds with the use of GMA2 Stakehill in particular as it lies outside of Rochdale Council's defined urban area. **This renders this statement wholly incorrect. I therefore challenge it directly.**
3. The Overview document section 'Net loss of Green belt' states that "the overwhelming majority of responses [to the first draft GMSF] related to Green belt loss". **I challenge that the revised GMSF takes these comments/views into proper consideration, given the obvious ('overwhelming majority of responses') strength of feeling on the loss of Greenbelt. I further challenge, therefore, that the GMCA in its revised GMSF has properly considered these comments/views.**
4. **I believe** that the proposed allocations of Greenbelt areas are a major step in the wrong direction for the future of Greater Manchester to become, paraphrasing Andy Burnham, a leading World class city region.
5. **I believe** that the proposed allocations of Greenbelt land will add to urban sprawl. These allocations directly conflict with both the spirit and intention of the Greenbelt as described in national legislation and should therefore be removed from the GMSF. **I therefore challenge their inclusion.**
6. **I do not believe** that there is a proven case to allocate Greenbelt sites across Greater Manchester using the exceptional circumstance argument as described in legislation.
7. **I believe** that the revised GMSF should exclude all existing Greenbelt land from its allocation sites and thus proposed development plans.
8. **I believe** that a brownfield first approach should be adopted whereby the GMCA seek assurance from Government that this is a legitimate route to pursue and also seek urgent legislative change to that end, and before the GMSF is submitted to independent inspection.
9. **I do not believe** that a 'brownfield preference' approach, as described in the GMSF Overview document, will provide the necessary protection for the current Greenbelt.
10. **I challenge** the notion that new areas of Greenbelt proposed in the revised GMSF will have any protection given that proposals will remove the said same protection from current Greenbelt.
11. **I understand that the revised GMSF** has reduced Greenbelt loss to 4.1% across Greater Manchester. However, the area where I live (adjacent to GMA2 Stakehill) will see a loss of over 40% of its Greenbelt land. **This is an unacceptable level of Greenbelt 'take'.**
12. Whilst Rochdale Borough currently is over 60% Greenbelt, much of this is moorland used for grazing animals. This is generally inaccessible to the majority of residents and visitors. Rochdale Council make much of this Greenbelt figure and use to suggest it can be readily reduced without detriment to the environment. The revised GMSF supports this approach by using Greenbelt reduction figures which do not take any account of accessibility and usage. **I challenge this approach** as flawed because it doesn't show that the Greenbelt areas of greater general usage for leisure are those selected as allocation sites closer to urban areas.
13. **I do not think** that there is a need to expand Stakehill Industrial Estate to provide a further 250,000m<sup>2</sup> of employment space. **I believe** that if this is undertaken the jobs created in the Rochdale/Oldham

allocation sites are likely to be low paid warehouse-type work. Furthermore I do not believe that the hi-tech industries will be attracted to these sites.

14. **I believe** there is adequate provision of employment space as set out in Rochdale Council's Draft Allocations Plan (Sept 2018) to allow for growth in the medium to long term across Rochdale and up until 2028.
15. **I do not believe** that by proposing GMA2 Stakehill, the existing settlements and pockets of housing in the Slattocks/Stakehill area will be fully taken into account. The allocation will double the number of houses in the area and add an extra 60% to the footprint of Stakehill Industrial Estate.
16. **I believe** that the GMSF gives little or no regard to the local farming industry. **I believe** they provide a vital part of the local, regional and national economy in terms of their contribution to food production.
17. **I believe** that the local transport network and infrastructure cannot cope with houses on the Greenbelt.
18. **I believe** that any proposed **housing** should be built on brownfield sites and at much higher **density**.
19. Parts of GMA2 Stakehill have been subject to flooding in recent years. **I believe** that the proposals to build additional housing/employment space in this area will compound and are likely to create additional flood risks.
20. Where I live we currently experience high levels on **congestion** on the main roads/routes and motorway network. **I do not agree** that additional infrastructure [additional roads] if built, as proposed on the maps will solve this problem.
21. **Air Quality** levels in the M60/62/66 and A627M corridors in particular are already over the recommended limits. **I believe** that the GMSF plan will make air quality **worse** and that this will have a knock on effect to health services and health of the current population. **I do not believe** that this will be alleviated in the short to medium term.
22. Green spaces and the Greenbelt in our towns are a vital lifeline to a huge variety of plants, animals, insects and birds. **I believe** building on our green spaces and Greenbelt **will** have a **negative** impact on the **environment**.
23. **I rely** on the green spaces and Greenbelt close to my home for my **well-being** and leisure time. Building additional houses and employment space on Greenbelt and green space will, **I believe**, have a **negative** impact on my mental health and physical health.
24. Infrastructure such as hospitals, doctors, dentists, and educational facilities, are already over capacity/subscribed and the utilities such as sewerage/water system are already in need of urgent renovation and upgrading. **I do not believe** that the GMSF proposals will improve such services to the level required, particularly in the Slattocks/Stakehill area.
25. **I believe** that all avenues to bringing all brownfield sites across Greater Manchester to a 'deliverable' state must be exploited before any Greenbelt land is considered for development. I therefore call for all allocation sites containing Greenbelt land to be withdrawn from the GMSF until this is achieved.
26. **I believe** that remediation of difficult/toxic brownfield sites across Greater Manchester, no matter how large or small, should be undertaken before considering Greenbelt or green space for development.
27. **I believe** that money for brownfield site remediation must be found in the short to medium term, from either Central, Regional or local Council sources so that these sites are not left for future generations to deal with.
28. I recognise the need to plan properly and aspire for improvements to my local area, but I believe that the deregulation of existing Greenbelt is the wrong approach and will have a detrimental effect on my health and wellbeing, and a catastrophic effect on the heritage and sense of place for the local community.

In addition to the comments above, I would like to add alternative ideas such as:

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Yours sincerely

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