

Q1. What type of respondent are you?

I am responding on behalf of a group

Q2. Contact details Gordon Tilstone

Q3. Yes, I am over the age of 13

Q4. Thornham St John's Neighbourhood Forum, C/o 47 Thornham Lane, Middleton, M24 2RE
Email: info@tsjnf.org

Q5. Yes, publish our response in full

Q6. Do you agree we need a plan for jobs and homes in GM?

Mostly Agree

An appropriate spatial plan with defined policies could ensure the correct mix of housing to meet need, affordable housing can be delivered in the volume needed, the proper type of transport infrastructure and a range of jobs across Greater Manchester. But this should be a community led plan as opposed to a developer led plan, because local people have a much better understanding of the needs and aspirations for their area.

Q7. Do you agree that to plan for jobs and homes we need to make the most effective use of our land?

Disagree, because the question is open to misinterpretation. Essentially the proposals seek to create jobs and new infrastructure at the expense of Green Belt land. Communities and Local Authorities have differing views on what constitutes 'effective' use of land. The GMSF is overly dominated by an economic agenda, with environmental, health and social factors not being given equal consideration. 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" but the revised GMSF does NOT take these views into proper consideration, given the obvious strength of feeling on the loss of Green Belt.

The GMSF is predicated on removing the protected status of many areas of current Green Belt. There should be a simple question within the consultation to ask if people agreed or disagreed with this. Why was there not?

Q8. Do you agree that in planning for jobs and homes, we also need to protect greenspaces that are valued by our communities?

Agree

Heritage assets and greenspaces valued by communities should be protected. Greenspace/ Green Belt add to quality of life, physically and mentally, and promote social cohesion and community buy in. As stated above: the GMSF is overly dominated by an economic agenda, with environmental, health and social factors not being given equal consideration.

The GMSF is predicated on removing the protected status of many areas of current Green Belt. There should be a simple question within the consultation to ask if people agreed or disagreed with this. Why was there not?

Q9. Do you agree that to protect green spaces we need to consider how all land in GM is used?

Disagree, because the question is open to misinterpretation. As a starting point, Green Belt land should retain a greater level of protection, secure for future generations. The spatial plan should focus on delivering realistic housing and economic growth within existing non-Green Belt areas. The GMCA should use its devolved powers and political influence to progress from a 'brownfield preference' approach to a 'brownfield only' policy for at least 15 years. This will then provide the necessary protection for the current Green Belt. This approach would enable brownfield land to be identified, brought forward and remediation undertaken so that it can be fully utilised.

The GMSF is predicated on removing the protected status of many areas of current Green Belt. There should be a simple question within the consultation to ask if people agreed or disagreed with this. Why was there not?

Q10. Is the approach that we have outlined in the plan reasonable?

Disagree

1. The GMSF is based on unreliable and outdated population figures. The Housing Minister, Kit Malthouse MP, stated in a Westminster debate on 22 February 2019 and reiterated in a letter to Jim McMahon MP that the housing need target is not mandatory and an inspector would accept a lower number if there are constraints such as Green Belt.
2. The GMCA's choice of a 19 year plan (until 2038) means that housing need projections are overestimated. Planning policy recommends a minimum 15 year plan. Given the uncertainty around which household projections to use, and the unknown impact of Brexit, the GMSF should be revised to a 15 year plan with associated reduction in housing need. This means that with the currently available land supply there is a surplus of housing in excess of 17,000: there is actually sufficient land supply for a plan period up to 17 years without releasing any Green Belt.
3. The declassification of huge swathes of Green Belt over the plan period does nothing to incentivise development of brownfield sites. 'Brownfield preference' cannot be enforced by the GMSF which means that any Green Belt land released immediately loses any protection as soon as the plan is adopted. This issue needs resolution. Developers will target greenfield sites first because they regard them as easier to develop; if planning permission is refused they could win at appeal. The GMCA should use its devolved powers and political influence to progress from a 'brownfield preference' approach (which will NOT provide the necessary protection for the current Green Belt) to a 'brownfield only' policy for at least 15 years, and champion brownfield remediation.
4. Green Belt sites should also be safeguarded until a threshold in take-up of other sites has been met. Phasing of any new sites would ensure prime sites are prioritised. There needs to be more focus on short to medium term needs, rather than the longer-term needs, to ensure sites are sustainably phased into use.
5. Greater Manchester should differentiate itself from many other regions by embracing a truly sustainable vision of the future. This would build on Manchester's radical past with development being limited to existing sites and brownfield land or sites with derelict buildings on them.
6. There is minimal recognition in the GMSF that the commitment to provide housing is not just about building new homes. It must also be about ensuring the repair, renewal and replacement of existing homes in some areas. Where appropriate the use of existing buildings and properties should be maximised such as flats above shops and redevelopment of mills. This plan does not promote the right homes in the right places, reduce house prices, or provide homes for the homeless; there is insufficient attention to housing types: design, mix and tenure.
7. The economic growth projections are inflated. There is no recognition that the overall requirement for industrial space has declined across Greater Manchester over the last 15 years and is likely to continue to do so, nor that business relocation will result in vacant space becoming available over the period - which should be factored in. The result of the current strategy to provide a large number of new industrial sites could result in an increasing volume of vacant or derelict brownfield sites. Over the last 15 years there has been a net reduction in the amount of rateable industrial space of 4.6 million m² and this trend is expected to continue. Without an appropriate strategy to manage existing industrial areas there is a risk of a continued expansion onto new sites while leaving older sites vacant and derelict.
8. The GMSF lacks ambition to truly improve the health and well-being of residents; protect the individuality and heritage of the different towns and villages within GM; and radically change the patterns of behaviour that are

- currently contributing to poor air quality, traffic congestion and flood risk. This is illustrated by the choice of strategic locations for development which will only serve to conglomerate individual communities into one.
9. The context of the plan is not appropriately balanced because it focuses too much on the perceived need to expand travel opportunities while failing to recognise exponential growth in home-working (over 14% of average employed people, according to Office of National Statistics in 2016) and on the importance of reducing our need to travel in the future.
 10. The GMSF places far too much emphasis on logistics. This fundamentally conflicts with its 'green' aspirations to make Greater Manchester a carbon-neutral city-region by 2038.
 11. Many housing allocations are in currently inaccessible locations that would need profound improvements in public transport before they were sustainable. Transport infrastructure over the plan period is heavily reliant on vehicle journeys and too dependent on developer contributions to part fund government bids which could lead nowhere. There is a danger that developments could progress without the necessary infrastructure.
 12. There appears to be an overestimation of the likely benefits of HS2 and 'Northern Powerhouse Rail'. These are unlikely to drive a commuter shift from air or road to rail, and there are damaging environmental effects of running trains at very high speeds, or locating stations in the Green Belt, along with the destruction of miles of green space to accommodate the track and other infrastructure.
 13. There is only token reference to food production. Farmland is part of the food production industry, its destruction for housing and commercial development increases reliance on imported food and destroys farming livelihoods. Given the UK's imminent departure from the EU, removing farmland is in opposition to the food security of our region and makes little sense.
 14. The lack of detail and broad-brush statements available in the Consultation provide extremely limited scope for comment by ordinary residents. There are too many 'may be' and 'possible' and 'will seek' and 'hope' statements.
 15. The GMSF is predicated on removing the protected status of many areas of current Green Belt. There should be a simple question within the consultation to ask if people agreed or disagreed with this. Why was there not?

Q11. Do you have any comments about the context of the plan?

The GMSF fails to place sufficient emphasis on the importance of our existing Green Belt and open spaces in improving health, and the promise to tackle health inequalities is less than credible given statements elsewhere relating to increased air travel and logistics, and their associated emissions. Economic growth and ambition should not be at the expense of the community and environment. The natural health services provided by our green and blue infrastructure play a significant role in sustaining people's physical and mental health and wellbeing, in addition to helping people on the pathway to recovery after illness.

The GMSF places far too much emphasis on logistics and travel opportunities. There is insufficient consideration around how few people these logistics sites actually employ, and that over 14% of employed people in the North West are now working from home for all or part of the week – a trend that is steeply rising. It is illogical to plan for more commuting movements using out of date formulae to calculate the amount of employment land that will be required. The result of the current strategy to provide a large number of new industrial sites could result in an increasing volume of vacant or derelict brownfield sites. Over the last 15 years there has been a net reduction in the amount of rateable industrial space of 4.6 million m² and this trend is expected to continue. Without an appropriate strategy to manage existing industrial areas there is a risk of a continued expansion onto new sites while leaving older sites vacant and derelict. The overall size of employment sites required appears overly high, and risks housing being allocated to support employment that does not materialise.

Greater Manchester needs professional, scientific and technical and business, administration and support services. In common with most of the UK we have a shortage of qualified health workers. How will this be addressed by a massive increase in employment, industrial and warehousing floor space?

The expansion of Manchester Airport and proposed road building is at odds with Greater Manchester's ambition to be a carbon-neutral city-region by 2038. We cannot see how the GMSF will help deliver a net gain in biodiversity assets over the plan period and the production of a Clean Air Plan, in the context of building more roads, increased warehousing and logistics, and growing substantially the number of flights annually at Manchester Airport.

Identifying so much Green Belt allocation over a 20 year period is unreasonable, given the uncertainties. The danger is that once identified for building it will be difficult to reverse the allocations should building not be required. There should be a shorter plan period to avoid unnecessary Green Belt loss.

There is sufficient land supply for a plan period up to 17 years without releasing any Green Belt land. This is evidenced in the GMSF 2019 Overview document thus: "*We have identified more land than our evidence suggest we need over the plan period...*". The minimum time period for a spatial or local plan is 15 years, this would still leave time for local plans to be aligned with GMSF.

Q12. Do you agree with the Strategic Objectives?

Mostly disagree

The entire strategy appears to be predicated upon the release of land from protected Green Belt status in order to provide housing to meet overinflated growth estimates and more warehousing/industrial and large scale employment sites, the latter without due regard to the changing workplace environments and the increase in home working. The strategy lacks ambition to truly improve the health and well-being of residents; protect the individuality and heritage of the different towns and villages within GM; and radically change the patterns of behaviour that are currently contributing to poor air quality, traffic congestion and flood risk. This is illustrated by the choice of strategic locations for development: most juxtaposed to existing motorways and industrial estates.

Local councils in Rochdale, Oldham and Bury have made no attempt to properly engage with their residents, and with people who visit the area for work or leisure, in order to understand how communities can contribute and co-design development in our local areas to meet our future aspirations. Rochdale Council in particular appear to pay 'lip service' to the views of existing residents. The entire consultation document contains sweeping statements ('improving our green infrastructure network, reducing carbon emissions, addressing air quality and reducing flood risk') that are not substantiated when the limited detail is considered.

The GMSF Overview document in particular reads like a marketing brochure, without true regard to the value and existing utilisation of the Green Belt. The proposed loss of Green Belt in many allocations is much greater than the headline 4.1% and will result in a direct diminution of amenity and environment for both residents in those areas and more widely.

Strategic Objective 2 should move beyond commitments to 'prioritise brownfield land' (which will NOT provide the necessary protection for the current Green Belt) by progressing to a 'brownfield only' policy for at least 15 years. This approach would enable brownfield land to be identified, brought forward and remediation undertaken so that it can be fully utilised before Green Belt. The GMCA should use its devolved powers and political influence to secure this.

Q13. Do you agree with the Spatial Strategy?

Mostly disagree

The Spatial Strategy does seek efficient use of land resources but is too economic focused with insufficient recognition of the quality of the natural environment and identification of key green areas linking the urban core with the rural hinterland. We fully support paragraph 4.10 "Abnormal costs such as those associated with addressing land contamination can have a negative impact on the viability of developing brownfield sites, and so securing funding to support remediation will be a priority."

However we **fundamentally disagree** with the proposals because they seek to create jobs and new infrastructure at the expense of Green Belt, instead of ensuring ALL current Green Belt is retained as a priority because it:

1. Is essential to the mental and physical health and well-being of residents;
2. Contributes significantly to the desirability of Greater Manchester;
3. Reflects our unique heritage with northern mills and waterways within an undulating landscape of hills and farmland; and
4. Is irreplaceable.

The current local road network suffers from a lack of investment in its ongoing maintenance. This is a key area of current and future need.

Despite plans to reduce reliance on the car as a modal choice, it is difficult to see how this will change with the limited associated transport proposals.

Q14. Do you agree with the proposed policy on the Core Growth Area?

Agree

The Core Growth Area is the most accessible place in the City Region, with existing transport connections and other supporting infrastructure. Focusing growth at the Core Growth Area helps maximise the accessibility of jobs to residents in existing built up urban areas and it is hoped the access will be supported by sustainable and public transport modes.

Q15. Do you agree with the proposed policy on the City Centre?

Agree

The City Centre is the right location for land uses at higher density due to the highly accessible nature.

Q18. Do you agree with the proposed policy on the Inner Areas?

Mostly agree

There is a lack of detail for the extent of the Inner Areas. Neighbourhood Planning should be seen as true devolution and be referred to as providing an opportunity for improving areas. Community-led regeneration has many economic, social and environmental benefits that could be harnessed. Sustainable modes of transport should be encouraged, but cycle ways and footpaths should be amenable and safe. Everyone living in inner areas needs suitable parks and green space to enjoy, particularly older and younger age groups.

Q19. Do you agree with the proposed policy on Northern Areas?

Mostly disagree

We support the proposed investment in town centres, but the aspirations around 'influx of more entrepreneurs and skilled workers' are highly speculative and definitely do not justify the large scale use of Green Belt land. There is little detail on the plans for the Northern Areas, and sweeping statements around boosting economic opportunities and diversifying housing provision lack any evidence. The Green Belt areas in this proposed policy provide exceptional defence against urban sprawl, a key purpose according to national policy.

Q20. Do you agree with the proposed policy on M62 North East Corridor?

Disagree

The jobs growth projection is unreasonable; consequently less employment land to accommodate fewer jobs means there is no exceptional need to justify Green Belt release and ordinary countryside at this broad location for development. There is no evidence base presented to support the creation of a *'critical mass to enable major investment in infrastructure and attract high quality businesses, jobs and housing'*.

This policy is unacceptable because it proposes that three major sites would be removed from the Green Belt as well as significant development on land outside the Green Belt such as the completion of the Kingsway Business Park and the expansion of Stakehill Industrial Estate. At Kingsway, it has taken 10 years for it to achieve 60% occupancy. Stakehill has 25% of empty units, at least one of these having been vacant and in its original configuration for over 10 years. Thus both these business/ industrial estates have had vacancy/empty plots for many years. Expanding these into the Green Belt, semi-rural areas, beloved and much used by the many people who live close by is at odds with many of the GMSF objectives. Furthermore, the Borough populations of these Rochdale/Oldham cross boundary sites have some of the most inactive adults and higher levels of obesity and respiratory disease than most of **Greater Manchester. Converting Green Belt into low-grade employment spaces will significantly reduce opportunities for local people to exercise and the increased volumes traffic on the M62 will simply exacerbate respiratory illnesses.**

The proposed development here will simply fuel unsustainable patterns of growth and will be entirely road based. This is born out of the reality that funding is already committed to the capacity of Simister Island (junction of M62, M60 and M66), due to gridlock as a result of the high volume traffic at this location. Further development in the vicinity would cause inevitable problems from a concentration of yet more road-based traffic, much of it HGV causing yet more environmental harm and congestion on Europe's busiest stretch of motorway. This does not represent sustainable development.

There are no proposals to electrify the closest mainline rail line, the Calder Valley Line, which would greatly assist with a number of the GMSF strategic ambitions for public transport, cleaner air and noise pollution.

With further thought, this upgraded rail line could provide capacity for freight from the existing industrial/business estates, further reducing the reliance on long distance heavy goods road transport. The knock-on effect would be a freeing-up of the road network.

These arguments hold true even if HGV were to convert to electrical propulsion in the near future.

The proposed loss of Green Belt in this sub region is much greater than the headline 4.1% and will result in a direct diminution of amenity and environment for both residents in those areas and more widely.

Q26. Do you agree with the proposed policy on Strategic Green Infrastructure?

Disagree

All green and blue infrastructure assets both individually and as a strategic network play a vital role in people's physical and mental wellbeing. Much of this infrastructure already exists as the Green Belt. Green Belt areas outside of the four specified examples of strategic green infrastructure play a vital role in human, animal and environmental well-being.

Policy GM G 1 and the GMLCSA provide further evidence of the need to protect a broader range of green infrastructure.

The GMLCSA uses the Landscape Character Type 'Urban Fringe Farmland' for the GMA2-Stakehill & GMA1-Northern Gateway allocations. This assessment show scant regard for the green infrastructure nature of these allocation and there strategic nature as food production areas through the farming industry and in helping to maintain biodiversity and the current landscape characteristics.

The proposed loss of Green Belt in many allocations is much greater than the headline 4.1% and will result in a direct diminution of amenity and environment for both residents in those areas and more widely.

Also see my answer to Q79 with regard to the GM Green Belt Assessment (2016)

Q27. Do you agree with the proposed policy on a Sustainable and Integrated Transport Network?

Mostly agree

With reference to the GMSF Transport Topic Paper (January 2019):

- Point 85 – The reliance on the car for school journeys will be difficult to overcome. Many parents drop their children at school on the way to work and time constraints mean this has become a necessity along with safety/security considerations. Unless there is major investment in dedicated small local minibuses-type systems or walking ‘guardians’, this car reliance will continue.
- Point 97 – bullet 2 *“there is a broadly inverse relationship between settlement size and average distance travelled – metropolitan areas, large urban areas and settlements larger than 25,000 population tend to have shorter annual average travel distances..”* The proposed GMA2 Stakehill allocation when added to the current local population will not produce the necessary people numbers and therefore does not align with this policy statement. Increasing density close to better public transport networks in Castleton (bus & rail); Middleton (bus interchange); Rochdale (bus, train & Metrolink) would better fit with the overall Transport strategy and thus GMSF.
- Point 100 – The slow roll-out of a significant electric charging network will discourage people from investing in ULEVs. This should be urgently addressed
- Point 101 – *“According to the England Noise Map published by Extrium motorways have the highest levels of noise, including the M60 and the M62, although these are less likely to be in the direct vicinity of residential areas, unlike A and B roads. With regard to air travel, the area directly surrounding the airport, and take-off and landing approaches are the worst affected areas...”* The proposed GMA1, 2 and 3 allocations will sit ‘directly in the vicinity’ of the motorway network. Indeed, the northerly section and likely housing site of GMA2 will be enclosed on three sides by the M62. A627M and its Slattocks spur. The site also sits directly beneath a regular flight path into Manchester Airport – a route which will see greater use as airplane traffic increases. Mitigation measures are unlikely to reduce these noise levels over the short-medium term, at best.
- Point 111 – *“Character Impacts: Projects have the potential to affect landscape, historic environment and local character. Projects of all scales should be developed sensitively and through less harmful routes where impacts will be minimised. With investment in public/active transport, there will be opportunities to improve areas (e.g. town centres, local centres or footpaths), and this should be recognised in the policy.”* This is directly relevant to GMA2 Stakehill as stated in my comments to other questions.
- Point 112 – *“Previously Developed Land Impacts: The schemes outlined have potential to have a positive effect on previously developed land by improving access and making it viable.”* As GMA1, 2 and 3 allocations are not ‘previously developed’ this statement appears to contradict itself.
- Point 114 – bullet 3 *“Highlighting the social benefits of including quality of place”* Current Green Belt at GMA1, 2 and 3 allocations provides exactly the ‘quality of place’ and will be lost should the proposals go ahead.
- Point 126 – *“GMSF Site Selection”* - GMA1, 2, 17, 21, 23, 25, 26, 27, 28 and 29 allocations do not meet the criteria as defined in at least the first three bullet-points, if not all, in this section.

Q28. Do you agree with the proposed policy on Sustainable Development?

Mostly agree

The GMSF fails to place sufficient emphasis on the importance of our existing Green Belt and open spaces in improving health. Economic growth and ambition should not be pursued at the expense of the current community and environment. The benefits of the Green Belt and rural landscape are wide and include related jobs in farming and food production, natural capital services, including a network of habitat for our wildlife, and flood-resilience to assist climate change adaptation.

Removing large areas of current Green Belt particularly at GMA 1, 2 and 3, and replacing them with new much smaller sections will in no way mitigate for these proposed allocations.

The 'preference' given to using previously developed (brownfield) land is inadequate and insufficient to ensure that the countryside of Greater Manchester is better protected and enhanced for future generations. Sustainable development should prohibit removal of Green Belt status until all brownfield land is identified, remediated and delivered.

Q29. Do you agree with the proposed policy on Carbon and Energy?

Agree

We totally agree with the delivery of a carbon neutral Greater Manchester by the end of the Plan.

But it is meaningless in the face of GMSF proposals to build on Green Belt such as at GMA2-Stakehill, with the subsequent creation of more congestion on the local roads network by building homes and expanding industrial and warehousing site.

Q31. Do you agree with the proposed policy on Resilience?

Mostly Disagree

Whilst it is reasonable for the GMCA and constituent authorities to plan for a more resilient Greater Manchester in the future, the statement 'Increasing the size, spread, quality and interconnectedness of the green infrastructure network, enabling the city region, its citizens and wildlife to adapt to changing conditions' and 'Supporting healthier lifestyles and minimising potential negative impacts on health including air pollution' are meaningless statements in the face of plans to build on Green Belt.

The proposed loss of Green Belt in many allocations is much greater than the headline 4.1% and will result in a direct diminution of amenity and environment for both residents in those areas and more widely. This proposed loss will therefore have a direct impact on the resilience of these areas particularly with regard to water run-off and flooding.

Q32. Do you agree with the proposed policy on Flood Risk and the Water Environment?

Mostly Disagree

Statements such as '*Expecting developments to manage surface water run-off through sustainable drainage systems and as close to source as possible (unless demonstrably inappropriate) so as to not exceed greenfield run-off rates or alternative rates specified in District local plans*' are pointless statements in the face of plans to build on Green Belt. As recent experience has shown (16-17 March 2019 and late December 2015) flooding has occurred in fields and on main roads in Slattocks/Stakehill, and in a variety of locations across Rochdale Borough. This situation is likely get significantly worse and could become an even more regular occurrence if the Green Belt at GMA2 Stakehill and other allocations are built on.

Q33. Do you agree with the proposed policy on Clean Air?

Disagree

This policy is meaningless in the face of proposals to build on Green Belt. These planned developments will create increased car or lorry dependency and so will lead to a further deterioration in existing air quality; the GMSF policy contains a weak list of mitigation measures and in particular seems to be happy for polluting development to be allowed provided that the pollution is monitored. Clean air is vitally important for the health of the environment and the people and nature that are located within it. The expansion (doubling of volume) of the airport and some road investment appears at odds with the clean air policy GM-S6.

Q36. Do you agree with the proposed policy on Supporting Long-Term Economic Growth?

Disagree

Plans around Manchester Airport, the Northern Gateway and M6 Corridor would cause needless harm to Green Belt.

The employment land strategy appears to offer developers (and businesses) an extensive range of sites. Securing growth by offering a wide range of choices to developers might be an acceptable short-term strategy if the land is available, but the longer-term strategy should be to try and rebalance the economy within Greater Manchester and encourage growth into areas that need it. There should be more focus on driving economic growth in the town centres by, for example, bringing retail units back into use as flexible work space for start-up businesses.

The revised GMSF does not provide sufficient detail to support the proposals to address the productivity challenge in Greater Manchester, either between the north and south of the region, nor nationally. The growth assumptions are unrealistic and significantly higher than necessary in the light of other uncertainties, such as Brexit. This over-planning for employment uses is likely to result in an oversupply of premises and in particular of manufacturing and warehousing, and as 50% is focused on greenfield land it will cause needless development of the countryside. The commercial property market will be driven down, and a result there will be even more vacant warehouses, leading to low values and areas being blighted.

The value of the food and drink sector to Greater Manchester is underrepresented: it is a thriving and productive economic sector.

Q37. Do you agree with the proposed policy on Employment Sites and Premises?

Disagree

The proposed number of employment sites required appears excessive. The impact of this would be an over-allocation of sites, which will impact on the viability of the less favourable sites to come to the market.

The Plan states that there is an over-supply of sites. There is no recognition the new brownfield sites will come forward with natural business turn-over within the Greater Manchester Region.

Whilst industry requires a choice of location to ensure the economy continues to grow, there also needs to be restriction on sites so industry does not alone dictate the pattern of development – particularly in the medium to long term. This is a real risk in the GMSF.

Since few industries look further than 5 years ahead in their location decisions, the GMSF should plan for sites to be phased in to use. Likewise, a phased approach also allows for new brownfield sites to come forward as businesses vacate them – therefore adding to the supply of sites and reducing the need to use green field sites.

Green Belt sites *must be safeguarded*. There is little alignment between the Greater Manchester economic strategy and the location of employment sites. The justification for the Green Belt release does not fit with the wider objectives of the GMSF.

Q38. Do you agree with the proposed policy on Office Development?

Disagree

The proposed allocation of new office floor space is excessive. It does not recognise the increase in home-based working. There should be no release of Green Belt protected land for the supply of office premises because there is adequate capacity on previously developed land, especially in Wigan, Rochdale and Bury.

Q39. Do you agree with the proposed policy on Industry and Warehousing Development?

Disagree

We strongly oppose the release of any Green Belt. If realism was applied to the employment figures for both manufacturing and warehousing it is clear that exceptional circumstances do not exist.

The proposed 4.22M m² of Manufacturing and Warehousing is greatly over stated given historical trends, market signals and continuing economic uncertainties associated with Brexit and the continuing global economic recession. The figures for Rochdale, Wigan, Manchester and Tameside are particularly excessive, even if the need for a higher proportion of development is steered towards more deprived areas (in order to tackle inequalities). Therefore the figures require review and application of realism. The brownfield preference should apply equally to manufacturing and warehousing, whereas only 50% is focused on brownfield land reuse. Wigan and Manchester have huge amounts of brownfield land that needs to be reused as a priority. As a minimum the majority of the proposed industrial and storage floor space should be delivered long-term and land should not be released from Green Belt; if there isn't the actual need the land should be held back from being allocated.

Over-planning for an excessive amount of commercial premises directly harms the countryside, especially the Green Belt. Over-planning employment premises is inconsistent with Revised Draft GMSF Section 5 policies.

It is clear from the 2016 GMSF public consultation that the principles encapsulating the Green Belt are well understood and Greater Manchester residents do not want Green Belt land to be released and allocated for development.

New industrial space is currently proposed as being in high demand in the GMSF, yet the GMSF fails to acknowledge that the overall requirement for industrial space has declined across Greater Manchester over the last 15 years, and this is expected to continue (the employment forecasts expect a further 30% decline in manufacturing employment by 2038) – so there should be a lot of vacant space becoming available over the period which could be added in – typically known as 'windfall sites'. The GMSF needs to respond to the challenge of ensuring businesses are able to find appropriate premises while managing the likely overall reduction in amount of occupied industrial space. Current analysis in the GMSF appears to only include gross demand for new space and does not consider business turnover rates in the region, which reflects how the development market works. A significant proportion of this former industrial space now makes up the portfolio of brownfield sites proposed for redevelopment. Without an appropriate strategy to manage existing industrial areas there is a risk of a continued expansion onto new sites while leaving older sites vacant and derelict.

Growth is focussed on logistics, which is not typically high skilled, and high value, despite the GMSF focussing on addressing the productivity gap. Instead the GMSF should prioritise building on the region's strengths in high value and advanced manufacturing to increase the productivity challenges we have in Greater Manchester. The GMSF needs to consider the risk factors of development including low skilled jobs, sustainable travel to work patterns, HGV movements across the region, and the proposed large footprints of industrial and warehousing premises. The focus on logistics in the North of the region will undoubtedly lead to increased congestion on the region's already congested motorway network.

There should be a focus on allocating sites that are close to where people live to ensure sustainable transport patterns, and prioritisation of smaller sites in the town centres to be made more attractive to host some of the proposed development to meet the 'diverse' supply required.

Q40. Do you have any further comments on the policies and overall approach proposed in A Prosperous Greater Manchester?

The Prosperous Greater Manchester section of the Revised Draft GMSF represents a substantial threat to Green Belt purposes across Greater Manchester. Over-planning for jobs has the consequence of pushing up the housing requirement figure, and so housing is over-planned too. The figures being proposed are excessive, particularly given the decline of traditional industry and economic uncertainties. The GMSF completely fails to place sufficient value in rural economic sectors, such as agriculture.

We commend GM Mayor Andy Burnham's Town Centre Challenge. However, in Rochdale Town Centre particularly, this approach is not in evidence. Whilst there is currently new retail development at Riverside, other older retail developments (Rochdale Exchange & Wheatsheaf) and the shopping streets (Drake; Yorkshire; The Esplanade) have a great deal of (empty) capacity. Rochdale Council, with assistance from third parties if needed, should redevelop/repurpose these areas as a matter of urgency. This would then greatly relieve pressure to use Green Belt and fit well with ensuring new homes are developed close to public transport and local services.

Q41. Do you agree with the proposed policy on the Scale of New Housing Development?

Disagree

The proposed housing requirement for Greater Manchester of 201,000 net additional dwellings from 2018 to 2035 (19 years) is excessive. If realism is applied to the jobs growth requirement, based on more likely economic growth, rather than excessive growth predictions, then there is an opportunity to downwardly adjust the housing requirement, and in doing so save more Green Belt from development.

The GMCA continues to rely on the 2014-based demographic projections, despite the Housing Minister, Kit Malthouse MP, stating in a Westminster debate on 22 February 2019 (reiterated in a letter to Jim McMahon MP) that the housing need target is not mandatory and an inspector would accept a lower number if there are constraints such as Green Belt.

The GMCA's choice of a 19 year plan (until 2038) means that housing need projections are overestimated. Planning policy recommends a minimum 15 year plan. Given the uncertainty around which household projections to use, and the unknown impact of Brexit, the GMSF should be revised to a 15 year plan with associated reduction in housing need. This means that with the currently available land supply there is a surplus of housing in excess of 17K: there is actually sufficient land supply for a plan period up to 17 years without releasing any Green Belt land. Using the 2014 figures is biased towards the interests of developers who have a commercial interest in the use of this higher household need projection data.

The GMCA should use its devolved powers and political influence to progress from a 'brownfield preference' approach (which will NOT provide the necessary protection for the current Green Belt) to a 'brownfield only' policy for at least 15 years. This approach would enable brownfield land to be identified, brought forward and remediation undertaken so that it can be fully utilised before Green Belt. The GMCA should also plan on the basis of up to date figures and demonstrate exceptional circumstances for using its own method. In Greater Manchester there is 'exceptional circumstance' for a reduced number of houses given Green Belt purpose would be substantially and significantly harmed.

The GMSF fails to address the conflict between housing need (basic standards that society considers should be satisfied in order for citizens to be considered adequately housed, in terms of price, size and suitability) -which is calculable and finite – and housing demand (what some people are able and willing to pay for in the market) – which is also notionally infinite, with investors and high-earning households willing to purchase second, holiday and investment properties while the needs of those with lesser means continue not to be met. The Campaign for the Protection of Rural England (CPRE) call for a clear distinction between housing need and housing demand.

The housing crisis is not a crisis of numbers of homes, but of their affordability and distribution. If the market (developers) cannot, or are unwilling to, provide the types and tenures of homes that people can afford to live in, then actual need/demand will not be met, however high the headline targets are set.

Rochdale Council has offered up Green Belt sites which will overprovide for their published housing need targets. Landowners and developers will profit from the enterprise, with the Council ignoring the concerns of local people whose environment and sense of community will be blighted. Assessed and actual housing need for the area covered by GMA2 Stakehill and the immediate vicinity is negligible.

Councils should plan in partnership with local people who have a wealth of local knowledge and can assist the planning process either in person or through statutory bodies such as Neighbourhood Planning Forums.

Q42. Do you agree with the proposed policy on the affordability of new housing?

Mostly disagree

We strongly agree with the ultimate aim of providing an adequate supply of affordable housing, but not with the false premise that building more houses results in more affordable housing. The property market does not operate as simply as that, due to homes being bought as capital investments rather than just as a property to dwell in. Unfortunately, building more housing, particularly by releasing land in the Green Belt will not necessarily equate to households without access to a decent house being housed.

Also, people and companies are increasingly using houses as an investment, and are renting homes. The price and standard of private rental homes might be respectively too high, and too poor, causing many households to aspire to a council owned property. The enforcement of affordable housing contribution is essential. Since the introduction of the Government's NPPF in 2012 and revision of 2018, we have seen developers routinely renege on agreed contributions on the basis of their viability. The GMCA needs a well worded policy to counter the weakness inherent within national planning policy.

Q44. Do you agree with the proposed policy on the Density of New Housing?

Agree

Making effective use of land and not releasing land from protected Green Belt makes total sense.

Q45. Do you have any further comments on the policies and overall approach proposed in Homes for Greater Manchester?

As stated previously, Greater Manchester, with its important Green Belt setting, should make the case for lower housing numbers, with new housing focused around existing urban centres, due to the existence of existing transport and community infrastructure.

The 'brownfield preference' policy is inadequate. The GMSF should have sustainable development at its core and it should recycle and reuse land before needlessly sprawling out into countryside areas. The GMCA must work with all partners to unlock the development potential of sites currently constrained.

Q55. Do you agree with the proposed policy on the Net Enhancement of Biodiversity?

Disagree

A limited amount of development on good agricultural land is not necessary. All farmland is an asset and it is important to future generations for food production and must not be so easily sacrificed. The scale of development needed has been wrongly identified as too high as stated in my answers under housing and economic policies. Compensation for the proposed loss of Green Belt through newly designated smaller plots cannot reconcile harm, such as to peat loss.

Removing large areas of Green Belt from the Greater Manchester 'stock' will only serve to reduce biodiversity.

Q56. Do you agree with the proposed policy on the Greater Manchester Green Belt?

Disagree

We strongly object to allocations for development in land that is currently designated as Green Belt. As stated in my previous answers there is not the exceptional circumstance to justify the release of Green Belt across Greater Manchester.

Greater Manchester's Green Belt must be afforded the strongest protection in the future in accordance with NPPF Section 13 to uphold the five purposes. Independent expert economist evidence proves that the growth rates for economic development, and consequently the identified floor space requirement is much too high. There is a direct link between job numbers and new housing required. If the housing requirement is adjusted to reflect realistic economic growth, and based on 2016-based household projections, and the GMSF plan is for a 15 year period, then the land needed for jobs and housing is much less. This would result in no loss of existing Green Belt.

The GMSF Overview document states "*most new developments over the plan period will take place on ... sites within the urban area*". The whole of GMA2 Stakehill lies outside the defined urban area [Rochdale's Unitary Development Plan 2006] and is exclusively Green Belt

The GMSF Greater Manchester Green Belt Assessment 2016 when referring to GMA2 Stakehill directly. This document uses the locations RD56, RD62 and RD67 as follows: and the five purposes of Green Belt (NPPF):

RD56

As described: ... The land comprises gently rolling pasture fields delineated by hedgerows and farm tracks interspersed with a few farmsteads. St Johns Primary School is also located in the southern area of the parcel. Small blocks of woodland and tree belts buffer the major roads along the perimeter and Rochdale Way passes from east to west through the southern area of the parcel.

Purpose 1 - Check the unrestricted sprawl of large built up areas

1a - Does the parcel exhibit evidence of existing urban sprawl and consequent loss of openness?

Rating: Strong

1b - Does the parcel protect open land from the potential for urban sprawl to occur?

Rating: Strong

Purpose 2 - To prevent neighbouring towns merging into one another

2a - Does the parcel prevent the merging or erosion of the visual or physical gap between neighbouring settlements?

Rating: Moderate

Purpose 3 - To assist in safeguarding the countryside from encroachment

3a - Does the parcel have the characteristics of countryside and/or connect to land with the characteristics of countryside? Has the parcel already been affected by encroachment of urbanised built development?

Rating: Strong

Purpose 4 - To preserve the setting and special character of historic towns

4a - Does the parcel contribute to the setting and 'special character' of a historic town(s)?

Rating: No Contribution

Purpose 5 - Assist in urban regeneration by encouraging the recycling of derelict and other urban land

Rating: No rating given

Submission

Thus there is a 'Strong' rating for three of the Purposes and 'Moderate' for Purpose 2a.

Whilst Purpose 4 states 'No Contribution', we submit that as per 4a, the area does contribute in that it provides vistas of local landmarks, such as St John's Thornham and St Martin's churches, Tandle Hill Country Park, Manchester City Centre, the Cheshire Plain and Jodrell Bank Observatory, and across to Merseyside and North Wales. It also has a number of Public Footpaths, and Bridleways running through it, including The Rochdale Way, along with numerous natural springs and streams.

We submit that the overarching contribution of the parcel is 'Strong' as therefore meets the Green Belt Purposes very well.

RD62

As described: *This parcel is located to the north-east of Stake Hill Industrial Estate, Middleton with the A627 (M) forming the boundaries in the north and east. The land gently slopes up from the industrial estate to the east and consists mainly of pasture fields defined by hedgerow and hedgerow trees. Tree belts also occupy the banks adjacent to the major roads surrounding the parcel. Stakehill Fisheries and Stakehill Nurseries are located at the centre of the parcel off Stakehill Lane, as too are a number of residential properties and farmsteads.*

Ratings: Moderate; Moderate; Moderate; Moderate; No Rating

Submission

Thus there is a 'Moderate' rating for Purposes 1-4.

For Purpose 4, we submit that as per 4a, the area does contribute 'Strongly' in that it provides vistas of Tandle Hill Country Park along with two Public Footpaths through the parcel. Stakehill Fisheries have been created from what was the former dye works lodges fed by local springs and are used by people from outside the immediate area.

We submit that as the overarching contribution of the parcel rates 'Moderate' is has real value as Green Belt.

RD67

As described: *This large parcel covers the extent between Stakehill Industrial Estate and Chadderton Fold. Approximately three quarters of the parcel lies within Oldham Council District. The A627 (M) forms the eastern boundary with Rochdale Canal and the railway combining to make the western edge. The undulating landform mostly comprises pasture fields defined by hedgerows and hedgerow trees with a number of farmsteads situated throughout. A few clusters of residential development are also located in the eastern area between Healds Green and the A627 (M). Woodland is concentrated around the River Irk, which flows through the parcel and into the canal in the southern area of the parcel. Rochdale Way also traverses the parcel from east to west. There are steep topographical changes within the west of the parcel*

Ratings: Moderate; Moderate; Moderate; Moderate; Moderate

Submission

Thus there is an across the board 'Moderate' rating for the Purposes.

We recognise that this parcel does not equate directly with the section of GMA2 Stakehill, South of Stakehill Industrial Estate, in the revised GMSF. However the description still holds true in the main and therefore do the ratings.

A number of Public Footpaths across the parcel linking including directly from Rochdale Canal at Bridge 60, Boarshaw, to Tandle Hill Country Park, and from Stakehill Lane to Chadderton Heights, Chadderton Fold and Healds Green.

The contribution of the parcel rates 'Moderate' across the board and therefore fits well with Green Belt Purposes.

Overall, the three parcels (RD56, 62 and 67) therefore contribute collectively 'Moderately' to 'Strongly' to the Green Belt 'Purposes' as described in legislation and should not be considered for development in the GMSF, nor otherwise. Furthermore, the removal of part of RD62 in the GMA2 allocation, namely it's Southerly section bounded by A664 Rochdale Road, Thornham Lane, A627(M) and A627(M) Slattocks link road, will not provide an adequate 'barrier' between Castleton and Middleton, nor is it a sufficient space for local wildlife to truly thrive.

Additions to the Green Belt:

There appears to be no direct question relating to this so I will comment on this within question 58

Land to west of Stakehill Business Park

This is relatively small parcel of land intersected by the Calder Valley rail line and Rochdale Canal.

Other than the Canal towpath and a public footpath (currently closed for repair - for a significant period) it contains two separate horse stabling areas and is thus used mainly for grazing.

The very Northerly section holds a privately owned property and is thus publicly inaccessible, no public footpath goes through this section. Adjacent to this and west of the rail line sits Three Pits Allotments sit.

Thus we submit that it is largely inaccessible to the general public and in no way could be viewed as a replacement for the vast area of local Green Belt in the GMA2 Stakehill allocation.

Indeed to propose this and other small slithers of land as new Green Belt alongside Public Parks and Playing Fields in Rochdale, and no doubt elsewhere across Greater Manchester, is not in the spirit of 'enhancing the environment'.

Furthermore, the principal reason for its inclusion as new Green Belt appears to be that it is mainly owned by Rochdale Council and thus we view this as pure and simple tokenism and a sop by a Council Planners.

To use this plot and others to mitigate Green Belt loss locally shows an appalling contempt for local residents and other Green Belt users.

Q59. Do you agree with the proposed policy on Heritage?

Mostly agree

The assertions in this section are completely in conflict with the plans to build on Green Belt, which will have a catastrophic effect on the heritage and sense of place for local communities. The GMSF applies no weight to the importance of local culture and historic heritage to the local economy.

Q60. Do you agree with the proposed policy on New Retail and Leisure Uses in Town Centres?

Agree

Town centres must be revitalised in the context of changing retail patterns. Vacant properties, such as above shops should be used for housing.

We commend GM Mayor Andy Burnham's Town Centre Challenge.

Rochdale, Middleton and Oldham town centres continue to lack the necessary investment to thrive, despite some recent initiatives. Maximising all opportunities to regenerate existing buildings and increase density to provide affordable starter-type accommodation and office space will encourage the re-energisation these centres, provide a demand for quality retail, restaurant and social and leisure outlets and allow people to walk or use public transport to get to work. This will avoid patterns of development outside of the defined urban areas which are car dependent. The impact of the 'school run' on congestion and air quality is huge – but barely considered within the GMSF.

However, in Rochdale Town Centre particularly, this approach is not in evidence. Whilst there is currently new retail development at Riverside, other older retail developments (Rochdale Exchange & Wheatsheaf) and the shopping streets (Drake; Yorkshire; The Esplanade) have a great deal of (empty) capacity. Rochdale Council, with assistance from third parties if needed, should redevelop/repurpose these areas as a matter of urgency. This would then greatly relieve pressure to use Green Belt and fit well with ensuring new homes are developed close to public transport and local services.

Q61. Do you agree with the proposed policy on Education, Skills and Knowledge?

Agree

Natural green spaces such as Green Belt provide opportunities for learning at many levels: pre-school; primary; secondary; tertiary; higher education; and beyond. Research based learning is enhanced in outdoor environments. It provides for a direct experience and interaction.

Q62. Do you agree with the proposed policy on Health?

Partly disagree

The GMSF is overly dominated by an economic agenda, with environmental, health and social factors not being given equal consideration. The GMSF proposes the removal of some of our key areas of Green Belt and open space that are currently enjoyed by walkers, cyclists, runners, horse riders and others, and fails to place sufficient emphasis on the importance of our existing Green Belt and open spaces in improving health. The promise to tackle health inequalities is less than credible given statements elsewhere relating to increased logistics and road transport, and their associated emissions. Rochdale and Oldham have some of the most inactive adults and higher levels of obesity and respiratory disease than most of Greater Manchester. Converting Green Belt into warehouses and (probably empty) employment spaces will significantly reduce opportunities for local people to exercise, and the increased traffic on the M62 will simply exacerbate respiratory illnesses. Economic growth and ambition should not be at the expense of the community and environment. The natural health services provided by our green and blue infrastructure play a significant role in sustaining people's physical and mental health and wellbeing, in addition to helping people on the pathway to recovery after illness. Development in Green Belt areas would deprive local people of a highly valued asset for walking, cycling and other outdoor activities. The King's Fund document 'Access to green and open spaces and the role of leisure services' emphasises the importance of open green areas to peoples' physical and mental health, particularly in deprived areas.

Q64. Do you have any further comments on the policies and overall approach proposed in A Greater Manchester for Everyone?

Many of the policy statements are fundamentally at odds with the plans to sacrifice our Green Belt to development. Unsustainable development must be guarded against; our countryside and natural green spaces provide real added value and at the core of our values is inclusion and the ability of people to access these spaces in a way that is sensitive to wildlife habitats and farmland.

Q68. Do you agree with the proposed policy on the Public Transport Network?

Disagree

Green Belt land should not be removed in order to deliver HS2. It would be more desirable to have the city centres of Manchester and Salford connected rather than countryside land near the Airport. Manchester City Centre has good connections via bus, rail and Metrolink to Manchester Airport.

Q71. Do you agree with the proposed policy on Freight and Logistics?

Disagree

The GMSF places far too much emphasis on logistics as a source of employment. The job density of warehousing is low and is set to be lower as greater use of mechanisation, robotics and other technologies replace people. It is inappropriate to site more air freight in protected Green Belt, particularly when alternative brownfield land exists nearby. The airport fuels more imports than exports and this has a negative impact on the local economy.

Q74. Do you agree with the proposed policy GM Allocation 1: Northern Gateway?

Disagree

There is already a large amount of both unused space and built units within the Stakehill and Kingsway Industrial Estates. If this space is currently unsuitable it should be redesigned within existing footprints and the Estates not made larger by encroaching onto Green Belt.

The GMSF places far too much emphasis on logistics. There is insufficient consideration around how few people these logistics sites actually employ, and that over 14% of employed people in the North West are now working from home for

all or part of the week – a trend that is steeply rising. It is illogical to plan for more commuting movements using out of date formulae to calculate the amount of employment land that will be required.

The GMSF proposals for North East Manchester lack vision and aspiration for employment opportunities for local people in the future. Greater Manchester needs professional, scientific and technical and business, administration and support services. In common with most of the UK we have a shortage of qualified healthcare workers: how will this be addressed by an additional swathes of industrial and warehousing space? Do these professionals want to live in an environment choked with new build homes and warehouses and a diminished green open space and local culture?

GM should differentiate itself from many other regions by embracing a truly sustainable vision of the future. This would help continue Manchester's radical past with development being limited to existing sites and brownfield land or sites with derelict buildings on them and maintaining the heritage of the Green Belt.

Q75. Do you agree with the proposed policy GM Allocation 1.1: Heywood/Pilsworth (Northern Gateway)?

Disagree

As stated above, the GMSF places far too much emphasis on logistics with associated expansion in industrial and warehousing units. There is insufficient emphasis on the importance of our existing Green Belt and open spaces in improving health, and the promise to tackle health inequalities is less than credible given plans in this area to increase logistics and road transport, and their associated emissions. Economic growth and ambition should not be at the expense of the community and environment.

Q76. Do you agree with the proposed policy GM Allocation 1.2: Simister and Bowlee (Northern Gateway)?

Disagree

This proposed development is huge and would decimate the semi-rural nature of this area, essentially joining Heywood and Middleton and ruining the individual characteristics of the small villages of Simister and Bowlee. There is insufficient emphasis on the importance of our existing Green Belt and open spaces in improving health, and the promise to tackle health inequalities is less than credible given plans in the 'Northern Gateway' to increase logistics and road transport, and currently, their associated emissions. The associated new motorway junction and link road at or near Birch Services will only serve to increase problems on the already busy motorway network. Also unless strict controls and penalties are put in place, HGVs will seek out alternative local roads to avoid peak time delays. Economic growth and ambition should not be at the expense of the community and environment.

Q78. Do you agree with the proposed policy GM Allocation 2: Stakehill?

Disagree

- A. Point 1, page 210 states "*within a 'green' employment park setting*". This is not explained but given that the expanded employment zone will consume around 60-80 hectares of Green Belt, I strongly disagree with this statement.
- B. Point 6, page 210 states "*Support the delivery of improved public transport to and within the area...*" I am unable to assess the impact this may have given the lack of detail available.
- C. Point 9, page 210 states "*Improve access arrangements in and around Stakehill Industrial Estate...*". I am unable to assess the viability or impact this may have given the lack of detail available.
- D. Point 10, page 210 states "*Ensure that the existing settlements and pockets of housing are taken fully into account through the master planning of the area*". We strongly disagree with this statement as I am unable to assess the impact the allocation may have given the lack of detail available.
- E. Para 11.46 "*...It would involve the loss of Green Belt, however, it offers an excellent location...*" This statement is a real 'throw-away' given GMA2 Stakehill's scoring in the GMSF Greater Manchester Green Belt Assessment 2016 – see later in my comments within this question. It strongly suggests that it doesn't matter that this Green Belt area will be lost in the proposals. We call this into question and strongly disagree with it.

- F. Para 11.47 *“Stakehill Industrial Estate has a strong reputation as an employment location”* Inspection by myself and other local residents over the last 18 months and anecdotally are at odds with this statement. If the Estate has a *‘strong reputation as an employment location’* why have large users such as Tesco and Aldi relocated out of the area with over 25% of the units being currently vacant despite significant refurbishment? Indeed, Rochdale Council recently purchased a unit and leased it to Foot Asylum. This is either a desperate move or was cynically and preemptively made with a view to the proposed expansion of the Estate as part of GMA2 Stakehill allocation.

These are just some of the many examples we have referenced of the total lack of detail and transparency available in the Consultation and therefore provide extremely limited scope for comment.

This proposed site is all on Green Belt which should retain the highest protection from development. Development in this area would deprive local people of a highly valued asset for walking, cycling and other outdoor activities. The Green Belt extending from the Rochdale canal from Boarshaw Middleton, around Slattocks and Thornham Lane up to Tandle Hill around Royton and descending to Healds Green and Chadderton Fold and back to the canal is irreplaceable for local people AND visitors: it offers opportunities for ambles of varying distance and a range of recreational activities; it is linked to Rochdale and Middleton by the canal which provides a safe route for children and families to access it; it directly contributes to mental and physical health and wellbeing; and it encourages visitors to the area.

The GMSF states “most new developments over the plan period will take place on ... sites within the urban area”. The whole of GMA2 Stakehill lies outside the defined urban area (Rochdale’s Unitary Development Plan 2006) and is exclusively Green Belt.

In this site, the proposed loss of Green Belt ranges from 23.5% in Royton North council ward and 27.5% in Chadderton North to 37% in Castleton council ward. This dramatically differs from the quoted 4.1% reduction across GM and places a totally disproportionate burden on the communities of Slattocks, Stakehill and Thornham Fold.

Whilst Rochdale Borough currently is over 60% Green Belt, 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 Green Belt figure and use it to suggest it can be readily reduced without detriment to the environment. The revised GMSF supports this approach by using Green Belt reduction figures which *do not take any account of accessibility and usage*. This approach is flawed because it doesn’t show that the Green Belt areas of greater general usage for leisure are those selected as allocation sites closer to urban areas.

Rochdale has the highest percentage of physically inactive adults (28.2%: Fingertips PHE 2016/17 data) in GM and both Rochdale and Oldham rank in the top 25% of English Unitary Authorities for physical inactivity, and yet the GMSF proposes the removal of some of our key areas of open space that are currently enjoyed by walkers, cyclists, runners and horse riders.

The GMSF fails to place sufficient emphasis on the importance of our existing green belt and open spaces in improving health, and the promise to tackle health inequalities is less than credible given statements elsewhere relating to increased logistics and road transport, and their associated emissions. Economic growth and ambition should not be at the expense of the community and environment. The natural health services provided by our green and blue infrastructure play a significant role in sustaining people’s physical and mental health and wellbeing, in addition to helping people on the pathway to recovery after illness.

The impact of Green Belt in maintaining defined communities with their own heritage and support networks should not be underestimated. The Slattocks, Stakehill, Chesham Estate and Thornham Fold area is a small community of some 850 homes. It is defined by Green Belt and the Rochdale canal separating it from Middleton, Castleton, Heywood and Royton. The Oldham and Rochdale Ways pass through the area. The area benefits from a strong sense of community with a high number of elderly residents who are supported socially to live independently within a neighbourhood of younger working people.

The statements in the policy document relating to this site lack credibility, in particular statements 4, 11 and 12 (on page 210), which suggest the area's natural assets would be enhanced by the removal of Green Belt status and subsequent building upon it.

As stated in my answers to other questions, the GMSF places far too much emphasis on logistics. I strongly disagree that there is a need to expand Stakehill Industrial Estate to provide a further 250,000m² of employment space:

- Within Stakehill Industrial Estate (like GMA 3 Kingsway South) already has unused space and thus capacity. If the Estate and its assets are currently unsuitable they should be redesigned within the existing footprint, not made larger by encroaching onto Green Belt.
- The jobs created in the Rochdale/Oldham allocation sites are likely to be low paid warehouse-type work, in addition to generation of additional local road traffic, particularly heavy goods vehicles.
- It is hard to believe that the hi-tech industries will be attracted to these sites given the competitive nature of the multitude of sites proposed across Greater Manchester.
- There is insufficient consideration around how few people these logistics sites actually employ, and that over 14% of employed people in the North West are now working from home for all or part of the week – a trend that is steeply rising.

The GMSF lacks vision and aspiration for employment opportunities for local people in the future. Investment should be considered in the tourism industry. Around Rochdale and Oldham boroughs there are remnants of industrialisation intermingled with waterways and farmland that contribute to local identity and a sense of place. We need to attract more visitors from both within and outside our boroughs and their unique appeal exists because of their beautiful green spaces and opportunity to meander for miles along canal towpaths and country lanes with views of their industrial past. This would be in keeping with the character of the local Green Belt and reflect the heritage of the area. The proposed development of 900 houses and a 60% increase in the footprint of Stakehill Industrial Estate would decimate this.

We already have local heritage in Hopwood Hall and the historical connection with Samuel Bamford/Peterloo Massacre through Tandle Hill Country Park and Middleton. Walking tours of the area would bring in visitors and help small local businesses to flourish. The proposal to connect the East Lancashire Steam Railway to the main network at Castleton is welcomed and would help to increase tourism to the wider area.

The GMSF gives little or no regard to our local farming industry: this provides a vital part of the local, regional and national economy in terms of their contribution to food production.

The proposed GMA2 Stakehill development envisages *'a green employment park...with a focus on....advanced manufacturing, logistics and other growth industries.....around 900 high quality homes, including larger higher value properties....and create a sustainable high quality extension to the urban area'*. Actually Greater Manchester needs professional, scientific and technical and business, administration and support services. In common with most of the UK we have a shortage of qualified healthcare workers. How will this be addressed by additional industrial and warehousing (employment) space? Will these professionals want to live in an environment choked with new build homes and warehouses and a lack of green open space and local culture?

The absence of indicative plans for GMA2 Stakehill and other allocations means that local residents are disadvantaged when making their GMSF comments and left guessing at the true potential impact. I do not believe statement 10 (on page 210) which asserts that 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.

The local transport network and infrastructure (schools, GP surgeries, hospitals) cannot cope with these plans for building on the Green Belt in this area, and the GMSF does not explain how this will be addressed at this strategic planning stage, before any proposed development takes place. Utilities such as sewerage/water system are already in need of urgent renovation and upgrading.

We currently experience high levels on congestion on the main roads/routes and motorway network, and 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, which will not be alleviated in the short to medium term.

Parts of GMA2 Stakehill have been subject to flooding in recent years (December 2015 and March 2019). There are numerous springs and underground culverts throughout the area which result in localised flooding during heavy rain. Groundwater drainage is poor due to impermeable clay resulting in a very high water table. This results in the land in this area being prone to waterlogging despite the rural and largely undeveloped setting. Flooding has become a more frequent occurrence in recent years, with the amount of water sufficient to disrupt traffic on Rochdale Road and where the A627M spur joins the Slattocks roundabout. The proposals to build additional housing/employment space in this area would significantly increase the amount and velocity of surface water run-off, compounding and almost certainly creating additional flood risks.

The Green Belt in this area is a vital lifeline to a huge variety of plants, animals, insects and birds. The GM Ecology Unit identified 48 different species in the Stakehill area that are classed as protected or priority, and building on our green spaces and Green Belt will have a negative impact on the environment and the viability of these species.

Importantly, from the GMSF GM Green Belt Assessment document (2016), the areas of Green Belt allocated within this site perform strongly against the Green Belt purposes as defined in national policy. The GMSF fails to make a case for the exceptional circumstances that must exist before Green Belt boundaries can be altered within Greater Manchester.

The GMSF Greater Manchester Green Belt Assessment 2016 when referring to GMA2 Stakehill directly. This document uses the locations RD56, RD62 and RD67 as follows: and the five purposes of Green Belt (NPPF):

RD56

As described: ... The land comprises gently rolling pasture fields delineated by hedgerows and farm tracks interspersed with a few farmsteads. St Johns Primary School is also located in the southern area of the parcel. Small blocks of woodland and tree belts buffer the major roads along the perimeter and Rochdale Way passes from east to west through the southern area of the parcel.

Purpose 1 - Check the unrestricted sprawl of large built up areas

1a - Does the parcel exhibit evidence of existing urban sprawl and consequent loss of openness?

Rating: Strong

1b - Does the parcel protect open land from the potential for urban sprawl to occur?

Rating: Strong

Purpose 2 - To prevent neighbouring towns merging into one another

2a - Does the parcel prevent the merging or erosion of the visual or physical gap between neighbouring settlements?

Rating: Moderate

Purpose 3 - To assist in safeguarding the countryside from encroachment

3a - Does the parcel have the characteristics of countryside and/or connect to land with the characteristics of countryside? Has the parcel already been affected by encroachment of urbanised built development?

Rating: Strong

Purpose 4 - To preserve the setting and special character of historic towns

4a - Does the parcel contribute to the setting and 'special character' of a historic town(s)?

Rating: No Contribution

Purpose 5 - Assist in urban regeneration by encouraging the recycling of derelict and other urban land

Rating: No rating given

Submission

Thus there is a 'Strong' rating for three of the Purposes and 'Moderate' for Purpose 2a.

Whilst Purpose 4 states 'No Contribution', we submit that as per 4a, the area does contribute in that it provides vistas of local landmarks, such as St John's Thornham and St Martin's churches, Tandle Hill Country Park, Manchester City Centre, the Cheshire Plain and Jodrell Bank Observatory, and across to Merseyside and North Wales. It also has a number of Public Footpaths, and Bridleways running through it, including The Rochdale Way, along with numerous natural springs and streams.

We submit that the overarching contribution of the parcel is 'Strong' as therefore meets the Green Belt Purposes very well.

RD62

As described: This parcel is located to the north-east of Stake Hill Industrial Estate, Middleton with the A627 (M) forming the boundaries in the north and east. The land gently slopes up from the industrial estate to the east and consists mainly of pasture fields defined by hedgerow and hedgerow trees. Tree belts also occupy the banks adjacent to the major roads surrounding the parcel. Stakehill Fisheries and Stakehill Nurseries are located at the centre of the parcel off Stakehill Lane, as too are a number of residential properties and farmsteads.

Ratings: Moderate; Moderate; Moderate; Moderate; No Rating

Submission

Thus there is a 'Moderate' rating for Purposes 1-4.

For Purpose 4, we submit that as per 4a, the area does contribute 'Strongly' in that it provides vistas of Tandle Hill Country Park along with two Public Footpaths through the parcel. Stakehill Fisheries have been created from what was the former dye works lodges fed by local springs and are used by people from outside the immediate area.

We submit that as the overarching contribution of the parcel rates 'Moderate' is has real value as Green Belt.

RD67

As described: This large parcel covers the extent between Stakehill Industrial Estate and Chadderton Fold. Approximately three quarters of the parcel lies within Oldham Council District. The A627 (M) forms the eastern boundary with Rochdale Canal and the railway combining to make the western edge. The undulating landform mostly comprises pasture fields defined by hedgerows and hedgerow trees with a number of farmsteads situated throughout. A few clusters of residential development are also located in the eastern area between Healds Green and the A627 (M). Woodland is concentrated around the River Irk, which flows through the parcel and into the canal in the southern area of the parcel. Rochdale Way also traverses the parcel from east to west. There are steep topographical changes within the west of the parcel

Ratings: Moderate; Moderate; Moderate; Moderate; Moderate

Submission

Thus there is an across the board 'Moderate' rating for the Purposes.

We recognise that this parcel does not equate directly with the section of GMA2 Stakehill, South of Stakehill Industrial Estate, in the revised GMSF. However the description still holds true in the main and therefore do the ratings.

A number of Public Footpaths across the parcel linking including directly from Rochdale Canal at Bridge 60, Boarshaw, to Tandle Hill Country Park, and from Stakehill Lane to Chadderton Heights, Chadderton Fold and Healds Green.

The contribution of the parcel rates 'Moderate' across the board and therefore fits well with Green Belt Purposes.

Overall, the three parcels (RD56, 62 and 67) therefore contribute collectively 'Moderately' to 'Strongly' to the Green Belt 'Purposes' as described in legislation and should not be considered for development in the GMSF, nor otherwise. Furthermore, the redaction of part of RD62, it's Southerly section bounded by A664 Rochdale Road, Thornham Lane, A627(M) and A627(M) Slattocks link road will not provide an adequate 'barrier' between Castleton and Middleton, nor is it a sufficient space for local wildlife to truly thrive.

Additions to the Green Belt in this area:

Land to west of Stakehill Business Park

This is relatively small parcel of land intersected by the Calder Valley rail line and Rochdale Canal. Other than the Canal towpath and a public footpath (currently closed for repair - for a significant period) it contains two separate horse stabling areas and is thus used mainly for grazing.

The very Northerly section holds a privately owned property and is thus publicly inaccessible, no public footpath goes through this section. Adjacent to this and west of the rail line sits Three Pits Allotments sit. Thus we submit that it is largely inaccessible to the general public and in no way could be viewed as a replacement for the vast area of local Green Belt in the GMA2 Stakehill allocation.

Indeed to propose this and other small slithers of land as new Green Belt alongside Public Parks and Playing Fields in Rochdale, and no doubt elsewhere across Greater Manchester, is not in the spirit of 'enhancing the environment'.

Furthermore, the principal reason for its inclusion as new Green Belt appears to be that it is mainly owned by Rochdale Council and thus we view this as pure and simple tokenism and a sop by a Council Planners.

To use this plot and others to mitigate Green Belt loss locally shows an appalling contempt for local residents and other Green Belt users.

Q79. Do you agree with the proposed policy GM Allocation 3: Kingsway South?

Disagree

As stated above, the GMSF places far too much emphasis on logistics. There is already unused space within the Kingsway Business Park. If this space is currently unsuitable it should be redesigned within existing footprints, not made larger by encroaching onto Green Belt.

Q96. Do you agree with the proposed policy GM Allocation 17: Hanging Chadder?

Disagree

This proposed allocation is in the established Green Belt and Hanging Chadder currently provides a green space between the existing densely populated settlements on Rochdale Road, Grasmere Road housing estate, Fir Lane, and the housing estate of Thornham. Building any houses here would create Urban Sprawl. The main Castleton Road proposed access point, designed to serve more than 75% of the properties on the development, is within 100 metres of Thornham Saint James Primary School, which sees around 240 children aged between 4yrs and 11yrs arrive and be collected on each school day. This already causes double parking on both sides of this stretch of Castleton Road and other neighbouring residential streets. Any increase in traffic at this location would greatly increase the potential for an innocent child to be fatally injured. The other access point proposed directly onto Rochdale Road appears to be between two blocks of terraced properties, obscuring the view, both left and right, to motorists trying to egress onto a busy main road. Rochdale Road is the main arterial route between Rochdale and Oldham and already experiences a large volume of traffic at all times.

The areas identified for housing on the Concept plans could not sustain the numbers proposed. The land is very hilly and boggy, frequently flooding onto neighbouring homes and roads. The loss of trees and natural ground cover would compound the already poor drainage. The houses on Grasmere Road and Rochdale Road, bordering this site would be subjected to an increased level of flooding, despite the proposed SUDS. Roadside drains on Rochdale Road and Fir Lane cannot currently cope with the increasingly wet weather, leading to localised flooding, as regularly experienced on both Fir Lane and Castleton Road.

The pond on Hanging Chadder adjacent to Castleton Road, is currently a valuable community asset. At many times of the day, local children and families can be seen viewing the horses that drink there. The pond also supports a wealth of wildlife, including a large number of annually returning migratory Canada Geese. It also houses a diverse wealth of wildlife including some endangered species. The wildlife includes water voles & great crested newts.

The current water supply, drainage and sewer systems in this part of Royton, date from the 19th century and are at full capacity, a recent sewer collapse which closed the main arterial route between Oldham, Royton and Rochdale for a week proves this. Local electricity and gas supplies date back to the early/mid-20th century and were never designed to cater for the modern energy consumption levels. Localised power cuts due to overloaded/faulty substations are commonplace.

A 'strategic' housing plan would need to cater for the education and health provision of the people intended to live there. Whilst it would appear Royton is well served with schools; they are all at full capacity with primary and secondary schools already over-subscribed and already unable to cater for the current population.

Q100. Do you agree with the proposed policy GM Allocation 21:Thornham Old Road

Disagree

The proposed future use of this site is particularly ill-considered. Thornham Old Road and Thornham Lane are known as the Old Coach Road which was once tolled. It lies at the Royton/Middleton boundary totalling 1.7 miles with 3 miles of hedgerows these lanes still retain all the beauty and 18th century charm of the coaching days.

The proposed allocation is in the established Green Belt and Thornham Old Road is one of the preferred pedestrian access points to Tandle Hill Country Park. There are no clear access points to this proposed site so I assume access will need to be gained from Thornham Old Road which becomes a Public Bridleway where the small number of current houses end. The Road/Lane currently provides safe access for a variety of leisure users to paths extending to the Tandle Hill Country Park and its iconic War Memorial. It is also the route for farm traffic and to the Tandle Hill Tavern public house. Any increase in traffic at this location will greatly reduce the safety and enjoyment of walkers, heading to the Country Park.

Tandle Hill Country Park is a focal point on the landscape for many local people and those from surrounding settlements and towns and by tourists to the area. Building at GMA21 would diminish the striking views across the valleys into surrounding countryside and, the proposed uses would introduce a level of noise and air pollution completely at odds with the Tandle Hill Country Park.

The road junction of Thornham Old Road and Rochdale Road, the main arterial road (A627) between Oldham and Rochdale, would become a major crossroad junction with Thornham Lane. This is already a difficult and potentially dangerous intersection which would become even more dangerous.

Tyle Lodge, located where Thornham Lane becomes a Bridleway forms part of the proposed site and is currently a valuable community facility. It provides an important angling facility for the local fishing club, including new facilities for the disabled.

It also houses a wealth of wildlife including some endangered species. The wildlife includes water voles, great crested newts & bats.

The current water supply, drainage and sewer systems in this part of Royton, date from the 19th century and are at full capacity, a recent sewer collapse which closed the main A627 route between Oldham, Royton and Rochdale for a week proves this. Local electricity and gas supplies date back to the early/mid-20th century and were never designed to cater for the modern energy consumption levels. Localised power cuts due to overloaded/faulty substations are commonplace.

Q104. Do you agree with the proposed policy GM Allocation 24: Castleton Sidings?

Partially agree

Although some of this area is classed as Green Belt, it is previously developed as the name suggests. Its proximity to Castleton village centre and rail network make it a viable option for limited development of affordable and/or elderly/assisted living. However infrastructure and supporting services (particularly school and GP surgery capacity) must be properly considered and put in place before building commences, so that local people are not further disadvantaged.

Q109. Do you agree with the proposed policy GM Allocation 29: Trows Farm?

Disagree

This area is green open space and contains greenspace corridors and many natural springs. It has a very undulating topography. The sand belt running through the area does not make it suitable for building. The run off from the hills will compound the flood issues experienced by Slattocks and Middleton. The plan states the site will accommodate '360 new homes incorporating a good mix of house types including higher value housing' which is disproportionate, with no infrastructure in place to support this large development. However residents are aware that Indigo Planning Ltd on behalf of GLP Limited are already in advanced consultations with Rochdale Council with the proposal to build 600 -650 houses on the site – a huge cause for concern around the transparency of this entire consultation process. Air quality in this area is already poor due to it being next to the M62. This land should be left as a green corridor next to the motorway.

Q110. Do you have any further comments on the overall proposals for Rochdale, including the strategic transport interventions?

The proposal for GMA2 has been put forward despite the high numbers of objections received during the 2016 GMSF consultation. Rochdale MBC must start to involve local residents in its neighbourhood planning instead of trying to impose materialistic plunder of our Green Belt based upon inflated growth scenarios, with no regard to the health and heritage of the local community.

Q138. Do you have any comments on the overall proposals for Greater Manchester as a whole?

The entire strategy appears to be predicated upon the release of land from protected Green Belt status in order to provide housing to meet overinflated growth estimates and more warehousing/industrial and large scale employment sites, the latter without due regard to the changing workplace environments and the increase in home working. The strategy lacks ambition to truly improve the health and well-being of residents; protect the individuality and heritage of the different towns and villages within GM; and radically change the patterns of behaviour that are currently contributing to poor air quality, traffic congestion and flood risk. This is illustrated by the choice of strategic locations for development: most juxtaposed to existing motorways and industrial estates.

Local councils in Rochdale, Oldham and Bury have made no attempt to properly engage with their residents, and with people who visit the area for work or leisure, in order to understand how communities can contribute and co-design development in our local areas to meet our future aspirations. Rochdale MBC in particular appear seduced by the courtship of developers and builders and the associated revenues from council taxes, without any consideration to the views of existing residents. The entire consultation document contains sweeping statements ('improving our green infrastructure network, reducing carbon emissions, addressing air quality and reducing flood risk') that cannot be substantiated when the detail is considered.

Sadly the GMSF reads like a marketing brochure for development and housebuilding companies anxious to get their hands on high quality green space without any regard to the true value and existing utilisation of those green spaces.

Q140. Do you agree with the proposed policy on Developer Contributions?

Mostly agree

We agree that developers should be responsible for contributing to infrastructure improvements, but I do not have confidence in the GMCA's and Local Authorities' abilities to hold these developers to account. Anecdotal evidence from discussions with local Councillors with experience of the planning process, suggests that developers are very good at renegeing on their Section 106 responsibilities and commitments once they have control of a site. There are numerous examples across the Country where communities have been left without the promised services and infrastructure following developers' defaulting on plans.

Q141. How did you hear about this survey? Tell us a little bit more about how you found this consultation process.

- We do not believe that publicity of this consultation has been adequate nor sufficiently direct. A higher level of funding should therefore be apportioned to this for subsequent consultations. Many local residents, particularly those who don't use social media, have only been made aware by local Green Belt campaign groups through direct leafleting and local meetings. Rochdale Council did not arrange events in the GMA2 and GMA29 allocation areas affected by the GMSF.
- We believe that Rochdale Council has not conformed to its legal duty under the 'Statement of Community Involvement', and 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.
- If the GMCA is truly interested in Greater Manchester residents' views on this proposal it should directly contact every household in across the Region clearly presenting the pros and cons of this proposal and encourage residents' feedback.
- Local residents have found it difficult to assimilate the large span of documentation the consultation covers nor have been in a position to give it the necessary time and consideration and thus properly comment on it. The GMCA should acknowledge this and duly reflect on it in future consultations.
- We believe that developers and other third parties have a vested interest in the release of Green Belt land for housing and employment and should not be afforded the opportunity to comment.
- The GMSF is predicated on removing the protected status of many areas of current Green Belt. There should be a simple question within the consultation to ask if people agreed or disagreed with this. Why was there not?
- We do not believe that if as proposed, protection is removed from Green Belt, we can be assured that further loss will not occur nor that the 'new' areas of Green Belt will retain protected status going forward.
- We are not convinced that people's responses to this consultation will be given due regard and weight. A large section of challenge to the previous (2016) consultation received for the then Northern Gateway yet the proposals for these areas remain virtually unchanged in this 2019 GMSF.
- We believe that a definitive brownfield first approach should be adopted by the GMCA and assurance from Government should be sought that this is a legitimate route to pursue. To this end, the GMCA should also seek urgent legislative change to the NPPF. This should take place before the GMSF is submitted to independent inspection.
- We believe the 'start' date for the GMSF plan should be the date on which it is fully 'made' and passed by all the relevant authorities and that any associated plans run concurrently to GMSF.
- Whilst we have heard Andy Burnham encourage comment and say he's willing to listen to local residents, we have been discouraged by the attitude of Rochdale MBC's Head of Planning in suggesting that we should 'go and find' other land so that Green Belt is not used. With paid professional staff dedicated to this matter, we believe they are best placed to perform this task.