September 2020

Dear Mr Clarkson

**Greater Manchester Spatial Framework (GMSF):
Pre Publication Stage – September/October 2020**

You will be aware that each of ten Local Councils comprising the Greater Manchester Combined Authority (GMCA) will soon be asked to accept, via a vote at a whole Council meeting, the recommendations and content of the GMSF. If Councils agree, the GMSF will then go to the Secretary of State and to Independent Examination for further scrutiny.

I am concerned that:

1. With regards to the public consultation which will follow the local Council vote: despite Local and the GM Mayoral elections being postponed a full 12 months due the COVID pandemic (from May 2020 to 2021), this GMSF consultation and others (GM Clean Air Zone; Taxi Licencing) are being pushed through during continued restrictions. If the GMSF consultation were similarly delayed, it would allow everyone proper time to scrutinise the plan fully.
2. Councillors in Rochdale and across GM are being given very little time to make a major decision on this 20 year plan. Whilst they may have a good understanding of the information published to date, a number of new documents are being presented at this stage. I worry that they are being asked to make a very hurried decision.
3. Due to COVID restrictions the regular Councillors’ surgeries are currently suspended, meaning that I am unable to meet them face-to-face in order to fully discuss these matters. I am again (as with the first consultation in 2016) being consulted over the busy festive season giving very little time to absorb all the information and be able to provide considered and cohesive comments.
4. I feel strongly that there has been a definite lack of an open (true) consultation on the GMSF throughout the process. I regularly come across people in the area who are unaware of the GMSF proposals or how they will affect them in both the short and long term. There has been scant information coming from the GMCA, and Rochdale Council (RBC) does not appear to have acted in accordance with its own Statement of Community Involvement (SCI) published October 2019[[1]](#footnote-1).
5. Whilst I fully appreciate the need for the current COVID restrictions, for many months I have not had the opportunity to meet other local residents to discuss the GMSF’s implications; nor will we have the opportunity to meet the Council planning officers to further discuss the subject prior to making our comments to this consultation.
6. I remain concerned that this third draft of the GMSF will still show large areas of Green Belt under threat from development. This is despite Rochdale Council’s commitment to only using Green Belt as a very last resort[[2]](#footnote-2) and thus a Brownfield priority stance. Whilst my main concerns are in regard to the GMSF, GM2-Stakehill allocation, I also have regard for residents across Greater Manchester and their local Green Belt sites under threat.
7. GM Mayor Andy Burnham stated in a letter (August 2019) to Robert Jenrick, Secretary of State that “the majority of development (in GMSF) will be in urban areas”. This is definitely not the case in the Slattocks/Stakehill area as ***all*** the proposed development is on Green Belt. I believe it is also the case across Rochdale Borough and beyond.

I strongly believe that the proposed GMSF allocations on Green Belt should not go ahead as they contravene legislation to protect it. The National Planning Policy Framework (NPPF 2018):

* States “The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”.
* “urges LPAs (Local Planning Authorities) to maximise the use of suitable brownfield sites before considering changes to Green Belt boundaries and sets out the conditions that must be fulfilled for “exceptional circumstances” to exist, to justify such changes”.

I understand that Oldham Council has just announced that it has removed a number of the Green Belt allocations proposed in the GMSF in favour of alterative Brownfield sites.

I therefore urge you to press Rochdale Council to make a similar announcement, particularly with regard to GM2-Stakehill, but also other Green Belt allocations across the Borough.

As one of your registered constituents, I ask that you make representations to Rochdale Council to reject the GMSF proposals as they stand.

I have already raised these same issues with my local Ward Councillors.

I also ask that you raise my concerns both to the GMCA and within Government.

I trust I can count on your support and look forward to hearing from you as soon as possible.

Kind regards

***Insert Your name***

***Your address***

1. Specifically, point 4.39 of Rochdale council’s SCI details ‘how will the GMCA involve you’: (the) GMCA will publicise consultations by methods such as the GMCA website and each of the ten districts’ web sites, press releases, social media, meetings and workshops; GMCA will make consultation documents available on the GMCA website, at the principal office of each of the Greater Manchester Local Planning Authorities and at selected public libraries [↑](#footnote-ref-1)
2. Rochdale Council Draft Allocations Plan (Sept 2018) and Core Strategy (October 2016) [↑](#footnote-ref-2)