

Mythbusting

Separating some of the fact from fiction...

MYTH: Only responses via the portal are counted – post and email submissions are disregarded.

FACT: While the easiest way to respond is by using the online portal, a submission by post or email will be given the exact same consideration, **as long as it includes the information we need** – for example your contact details and which part of the plan you are responding to. We can't do a lot with anonymous submissions!

Find out more about how to make a response here: <https://www.greatermanchester-ca.gov.uk/what-we-do/housing/greater-manchester-spatial-framework/gmsf-consultation/>

MYTH: Postal responses need to contain the exact questions that are on the portal.

FACT: Postal or email responses do **not** need to contain the exact questions that are on the portal.

However, there is certain information that must be included, for example your name and contact details, the organisation you are representing (if you are), what you are commenting on, your comments, and your suggestions or alternatives to the plan.

We can't do a lot with anonymous submissions!

It is also important to understand that your comments will be made public (with personal details removed) and submitted to the inspector carrying out the examination into the plan. The inspectors will assess what people have said and make sure we have paid due regard to responses.

Full information on responding by post or email can be found here:

<https://www.greatermanchester-ca.gov.uk/what-we-do/housing/greater-manchester-spatial-framework/gmsf-consultation/>

MYTH: You have to answer all the questions on the online portal. Submissions that don't answer as many questions don't count as much as those where more questions are answered.

FACT: When using the online portal, you can answer as many or as few questions as you like. Just find the sections that interest you, answer the questions and press submit! It's the easiest way to take part in the consultation and the portal includes lots of links to background documents, information and context.

All submissions through the portal are given equal regard – it doesn't matter if you answer one question or all of them!

The only required section is the About You chapter because we're not able to accept anonymous submissions.

Take part in the consultation online: <https://www.gmconsult.org/communications-and-engagement-team/gmsf/>

MYTH: This consultation isn't important, as there is another one later this year. OR The second consultation later this year is just a rubber-stamping exercise, so this is the one that counts.

FACT: Neither of the consultations is more important than the other. The reason we have two is to allow us to take into consideration what people have to say this time around, analyse the responses and publish a new draft taking responses into account. The analysis of the feedback will be published and later this year everyone will get a chance to have a say on the new draft. This is the best way of getting everyone's views and producing a plan for everyone in Greater Manchester.

MYTH: The plan has deliberately been made too complicated for people to understand and could have been made simpler.

FACT: Greater Manchester's Plan for Homes, Jobs and the Environment is by its very nature a complex plan, with lots of supporting evidence and information to help people understand how the proposals have been developed. It's a statutory planning document covering the 10 local authority areas and there needs to be a robust evidence base supporting it. We have to publish this information.

This plan is also just one of many feeding into the future of Greater Manchester, and the plans ideally need to be viewed together to give you an understanding of the bigger picture and the broader context! So it can feel as if there is a lot of reading to do!

The overview document for the Plan for Homes, Jobs and the Environment talks you through our plan, chapter by chapter, and we hope this will help you find the sections you need and are most interested in.

- [View the overview document](#)
- [View the topic papers on each of the key themes](#)
- [View the supporting documents and evidence papers – including FAQs](#)
- [The broader context and other plans](#)

MYTH: Greater Manchester Combined Authority is forcing this on districts.

FACT: The ten local authorities, along with the GMCA, have worked on this plan **together** to ensure that new homes and jobs are provided in the right places with the transport infrastructure needed to support communities and manage growth sustainably.

Working together means that some districts will be required to build less houses than if each of the districts were working separately. It also means that any infrastructure put in place (for example transport networks) can be planned for the whole of Greater Manchester, not just the individual districts.

This plan needs the **unanimous approval** of the Combined Authority, which is the Mayor **and** the ten leaders of the districts. In addition, the ten leaders have agreed that the next draft of the plan will be taken through each of the ten full councils for approval, before it goes out to consultation again.

MYTH: We don't need more houses.

FACT: Building more homes is a very clear priority of central government. The Budget 2017 set out a national target to increase house building to 300,000 per annum by the mid-2020s and the

consultation on the Local Housing Need consultation reinforced the importance that the Government places on increasing the rate of housebuilding.

Within Greater Manchester it is recognised that housing is at the heart of many of the broader issues that we need to tackle, including health, carbon reduction, reducing homelessness, providing skills and training to our residents, and growing our economy.

In line with trends nationally, levels of all forms of homelessness have increased in Greater Manchester over the last five years. There were 3,142 households accepted as homeless and in priority need in Greater Manchester in 2016/17, a 44% increase since 2011/12. We have over 2,000 households in temporary accommodation waiting for a permanent home, generating significant costs for local authorities, and almost 100,000 people on housing waiting lists across the conurbation, with over 25,000 classed as having a 'reasonable preference', meaning they have a priority need for a home.

Only 2.5% of all dwellings in Greater Manchester are empty, the lowest level recorded since data began in 2004, and reflecting strong demand for additional homes across the city region. At the same time less than 1% of all dwellings have been empty for six or more months. This is a significant reduction in recent years, from a peak of 2.8% of all dwellings in 2008.

We have not been delivering enough new homes since the 2008 financial crisis, although this is steadily recovering. Around 9,000 net additional homes were delivered in 2017/18, the highest since 2007/08, driven by new developments in the central areas of Salford and Manchester. We need to continue and increase the pace of delivery if we are to meet local needs, support economic growth, and help to reduce the pressures which contribute to overcrowding, rough sleeping and homelessness.

MYTH: You are using the wrong housing figures to calculate the number of homes we need.

FACT: In October-December 2018, the Government consulted on a proposed methodology to calculate Local Housing Need. The Government's proposed methodology recommended the use of the 2014 Household Projections rather than the recently published 2016 Household Projections.

Greater Manchester Combined Authority followed the approach proposed in the consultation document.

The Government has since published its [response](#) to the consultation on 19 February 2019 and confirmed that the 2014 Household Projections should be the starting point for the calculation of Local Housing Need.

However, the housing minister Kit Malthouse recently commented in Parliament that the figures are not mandatory.

We do not believe we have discretion over the housing numbers for two reasons. These are:

- 1) The Government's own planning guidance says that local authorities are 'expected' to use the Government methodology to calculate local housing need and will be required to demonstrate exceptional circumstances to deviate from it. The guidance also states that the standard methodology 'identifies the minimum number of houses expected to be planned for'. In Greater Manchester's case, we have opted for a target which is close to the Local

Housing Need target. When we have sought guidance from civil servants, they have confirmed this is the right approach.

- 2) Secondly, by failing to make any reference to the Government's policy on Housing Deals, the Minister is only providing half of the picture. To access funding to clean up brownfield land - and thereby reduce the call on the green belt - areas like Greater Manchester are currently being told that we must set an even higher target for new homes than the one determined by the Government's formula.

Read more:

- [Mayor responds to Minister's comments on the Greater Manchester Spatial Framework](#)
- [View the Government's response and recommendations](#)

MYTH: You don't need to touch the green belt – just build on brownfield!

FACT: We are taking a brownfield preference approach when considering development plans, and through this 2019 draft of the spatial framework we are making a new drive to protect our green belt as far as possible.

Our [existing land supply data](#) shows the land we have already identified for around 190,000 homes. (This is the land **already identified** before we include the proposed additional allocations that are currently open for consultation.) We have counted all of these as part of our baseline supply.

However this existing land supply is not enough land to deliver what Greater Manchester needs, which is why we have also identified the [proposed additional allocations](#) as part of this consultation.

To make sure we are providing the homes and employment space we need, we do have to build on some green belt, but this 2019 plan compared to the previous 2016 one cuts the loss of green belt by more than half and also introduces new protection for other green spaces.

We want to make sure everyone has green space to enjoy, and by agreeing a plan we can protect some of our most accessible and important green spaces from speculative development.

We want to develop brownfield land first, however there are significant issues with the viability of some of this land. To access funding to clean up brownfield land, and thereby reduce the call on the green belt, areas like Greater Manchester are currently being told by central government that we must set an even **higher** target for new homes than the one determined by their current formula.

- If you think we have missed any sites from our existing land supply, please email planningandhousing@greatermanchester-ca.gov.uk
- View the maps on [MappingGM](#) and toggle the layers using the button on the top-right to see the different map data. Choose the PLANNING AND DEVELOPMENT option and then you will see the different data views available, e.g. existing land supply, green belt additions, proposed allocations etc.

MYTH: These plans will lead to overcrowding on public transport and roads, and put pressure on our already oversubscribed schools and doctors surgeries.

FACT: This plan is about a lot more than just homes and jobs. For major developments it outlines what infrastructure, such as schools and doctor surgeries will be provided to support them, meaning that existing services won't face extra pressure.

Alongside the this Plan for Homes, Jobs and the Environment, TfGM has released its 2040 Transport Strategy Delivery Plan. This sets out all the transport improvements to be implemented by 2025, as well as longer-term plans that will in part ensure the success of the GMSF.

You can read more about this here: <https://www.tfgm.com/2040>

MYTH: Why are you consulting, you will just do what you want anyway!

FACT: The above is not true; this is absolutely a genuine consultation. We believe local people are the driving force behind Greater Manchester's success and it is important everyone gets to have their say.

When preparing this 2019 draft of the spatial framework, we looked at what people said in 2016 and took this into account. One of the questions in our faqs document asks "What's different this time around" so you can see all the things that have changed since the previous draft.

We will be going through the same analysis this time round, and will use your responses to prepare a revised draft ready for a second consultation phase later this year.

As part of the process going forward, planning inspectors will check our consultation process and what we have done with the feedback so we couldn't just ignore the feedback even if we wanted to!

You can download our faqs from this page: <https://www.greatermanchester-ca.gov.uk/what-we-do/housing/greater-manchester-spatial-framework/gmsf-documents/>

MYTH: If you are not on social media there is no way to find out about the plans and drop-in events.

FACT: All 60 events being held during the consultation period are listed on our consultation platform. Individual districts are also promoting these locally in a variety of ways including on websites, in local newspapers, posters and site notices.

We are also advertising through bus and tram advertising, advertising space in the Manchester Evening News, local radio and online paid advertisements.

MYTH: The spatial framework is developer-led – they dictate to local authorities where they want to build.

FACT: One of the main benefits of producing the Greater Manchester Spatial Framework is that it will actually give local authorities **more** control over where development takes place.

Where councils can demonstrate that they have an adequate supply of land for housing, it makes it **easier for them to reject planning applications** in areas deemed unsuitable for development.

Where councils cannot demonstrate that they have an adequate supply of land for housing, it makes it easier for developers to build on less suitable sites.

Through this Plan for Homes, Jobs and the Environment, we are aiming for each district in Greater Manchester to have a defensible 5 year supply of housing land – this is not the case currently.

By planning for development needs up to the year 2037, Greater Manchester Combined Authority and councils can identify the **most sustainable** sites including, where appropriate, the most suitable land from the green belt, such as land close to public transport, near employment opportunities or areas that would benefit most from investment and regeneration.

MYTH: This is a “green belt grab” – GMCA and local councils aren’t interested in using brownfield for building homes.

FACT: The Mayor of Greater Manchester and the 10 district councils support the prioritisation of previously used, brownfield land. However, to access funding to clean up brownfield land – and thereby reduce the call on the green belt – areas like Greater Manchester are currently being told by central government that we must set an even higher target for new homes than the one determined by their current formula.

The vast majority of land identified for housing in this plan is in the urban area (87%), and most of this is brownfield. This revised draft of the spatial framework has reduced the net release of green belt for Greater Manchester by 50% from the 2016 draft of the spatial framework.

National planning policy however does not support a brownfield ‘first’ policy. Local authorities are required to demonstrate that there is a 5 year supply of land or housing which is available and deliverable. In addition, a Housing Delivery Test is to be introduced which will measure the actual number of homes built in a local authority area against the housing target.

If local authorities cannot demonstrate successful delivery or a 5 year supply of land, Government policy states that there is a presumption in favour of development for applications for housing, which can mean that applications on greenfield and green belt could be approved and brought forward before some brownfield sites are developed.

MYTH: There is not enough supporting infrastructure – congestion is bad enough already and this plan will make things worse!

FACT: Regard is given to supporting local facilities and infrastructure. As part of the plan preparation process there has been extensive engagement with infrastructure providers to raise awareness of areas subject to significant change and growth, so that their future investment decisions can be aligned with the plan. In fact, it is only through having this spatial framework that we are able to forward plan more effectively.

In developing this Plan for Homes, Jobs and the Environment, we worked closely with Transport for Greater Manchester, and transport infrastructure organisations to both consider and address the transport impacts of meeting the development needs of Greater Manchester.

For this reason, our plan has been published alongside Transport for Greater Manchester’s draft delivery plan, which supports their 2040 transport strategy. This sets out the measures that will be taken and the improvements to public transport that will be made to help Greater Manchester achieve its target of having half of all journeys made by public transport, walking and cycling by 2040.

When development proposals come forward seeking planning permission, the local planning authority will seek to negotiate contributions through Section 106 of the Town and Country Planning Act, seeking obligations on developers to either provide or make a financial contribution towards

community facilities or transport improvements to mitigate the impacts of development on a local area.

- [View TfGM's Transport Strategy 2040](#)
- [View TfGM's Draft Delivery Plan](#)