Minutes of meeting held on the 13th March @ the houses of parliament to discuss the Greater Manchester Spatial Framework and its impact on Bury.

Compiled by Chris Russell (Chair), The Friends of Bury Folk.

Attendees: - Government Housing Minister (HM) Kit Malthouse, 4 off Government Advisors (HM Advisors), Chris Russell (CR) Friends of Bury Folk Chairman, Ivan Lewis (IL) MP, James Frith (JF) MP, Cllr Rishi Shori (RS), Cllr James Daly (JD), Cllr Tim Pickstone (TP).

- 1) (IL) Q1, we all share concern about the 2014 figures being used for the standard method to calculate housing need, this will cause the loss of green belt. We want an explanation as to why these figures are being used in place of more up to date figures?
 - a. Response (HM), quite right that we are using the 2014 figures over the 2016 figures and this is because the 2016 figures for the first time where completely compiled by the ONS (Office for National Statistics). The ONS figures came back with some very strange figures for example Cambridge one of the fastest growing towns had a zero housing need, this fundamentally produced a weird result that under pitched the overall target. The ONS decide to compile the figures over only 2 data points in time whereas the Government use 5 data points in time, the 2 chosen points by the ONS were at points when data was unpredictable and low, this caused the government to revert to the 2014 figures while a new methodology is worked on for the future. The figures are not mandatory however they do form a starting point for the standard methodology.
- 2) (IL) Q2, The government states we have to use the Standard method other than in exceptional circumstances as the starting point assessment of housing need. What are the exceptional circumstances and what will the repercussions be if we chose lower figures?
 - a. Response (HM), you have two ways to approach the housing target, the first being to form a plan that outlines your housing requirement and you work towards that target or you form a plan with the current target and state how you are mitigating against the plan under the exceptional circumstances. We realise this is a high target (we are setting the bar high) to hit. However, yours is an attractive area with its location to central Manchester and young people need houses in your area.
 - b. Response (HM Advisor), many local authorities have spent lots of time and money formulating housing need, rather than talking to us and using our starting point of which you will be judged against by the housing inspector. We expect you to show what you can meet and what you cannot meet via the exceptional circumstances:
 - i. Local economic shock (large employer closing) or a period of economic change (Brexit?) or a new facility that increased the need for housing.
 - ii. Have you fully explored the density requirements on the areas you have.
 - iii. Have you fully explored the use of brownfield and public land that you have.
 - c. Response (HM Advisor), if you have demonstrated to the inspector that you have covered these 3 exceptional circumstance elements then your plan will be considered. Please remember that planning policy does not trump the greenbelt.
- 3) (IL) Q3, The government state that the 2014 figures are not mandatory. However if chosen not to have plan or lower estimates will the Government intervene? As example in 2013

Bury submitted 2 plans which were rejected on the grounds of not adequately meeting the housing need, however they did protect the greenbelt?

- a. Response (HM Advisor), we have ruled out the use of the 2016 figures they cannot be used as an exceptional circumstance against the 2014 current figures. No the government will not intervene you have to demonstrate the exceptional circumstances against the current 2014 figures.
- b. Response (HM Advisor), if you have no plan and not enough land for a 5 year supply against the current 2014 standard supply then you have no protection against possibly losing your greenbelt to development.
- c. Response (HM), the safest way for you as a local authority is to plan for 10-15 years to protect your greenbelt. You cannot plan for infrastructure or investment with a 5 year plan and you will just be constantly spending money on legal fights for greenbelt development as you do not have a long term plan. The plan should be forward looking and ambitious giving the right sorts of housing for your local needs.
- d. Response (HM Advisor), if you go into an inspection with the government inspector being completely defensive and not offering a coherent strategy you will not put yourself in a good position. You need to be positive and forward thinking, whilst justifying your need against our 2014 figures.
- 4) (JF) Q1, The main reason for this meeting is the dispensation for an area that has the lowest amount of brownfield sites available in its conurbation and we need to be part of a Greater Manchester plan to allow for the distribution of housing need within greater Manchester. How can Bury justify its exceptional circumstance of low brownfield availability to reduce its housing need?
 - a. Response (HM), again it's the 3 things you should do which is firstly to identify and use all your available brownfield sites, secondly you must look at the general density and is it providing the housing need, and thirdly are you cooperating with your neighbouring areas, and that is not just in Greater Manchester but also Lancashire, to take your housing need. If you can prove that you have covered the 3 points and that you as a local council want to protect the greenbelt (remember we have raised the bar for protecting greenbelt), then an inspector should approve your plan. I know it has been a lot in the media that the numbers should be lower. However that is just not how it works. You have to show your plan that mitigates against the 3 exceptional circumstances.
- 5) (JF) Q2, whilst there have been many attempts at the figures, and to give an analogy you can have any colour car as long as it is black, we have been arguing the schematics, and there is basically a very tiny amount of room for manoeuvre?
 - a. Response (HM), Ok, yes it is a high bar to hit and it is generally accepted that nationally we need the houses. Both parties agree on this that we must build a lot of houses over the next couple of decades.
- 6) (RS) Q1, we have really tried to cooperate with other authorities and maximise our densities on our available brownfield sites, bearing in mind the figures are not mandatory and we cannot use the 2016 figures how can we lower the figures?
 - a. Response (HM Advisor), again I will state you have 2 approaches, one argue your starting figure and the other is to show how you cannot achieve the starting figure by exceptional circumstances. I would expect you to be explaining to us what your reason under exceptional circumstance, such as economic shock, is for reducing your figures.



- 7) (RS) Q2, now we are part of a larger plan with Greater Manchester how does that work with respect to housing numbers?
 - a. Response (HM), well housing deals are about stretch, and as you know that is an ongoing discussion we are having with the Mayor of Manchester as to the shape and stretch and how that will look. Response HM advisor, the government are not prescriptive as to where in the Greater Manchester plan the stretch is located.
- 8) (TP) Q1, based on the assistance form government funding aiding the use of brownfield sites will that funding be made available?
 - a. Response (HM Advisor), we are currently agreeing, or not agreeing, the overall package for Manchester. However that does not mean you cannot use other routes such as Homes England to access funds from local councils outside of any Manchester agreement with the government.
- 9) (JD) Q1, Are the actual numbers of houses to be built the responsibility of the local authority?
 - a. Response (HM), Yes.
- 10) (JD) Q2, The use of the 2014 figures are not mandatory, is that correct?
 - a. Response (HM Advisor), you have to use them as a starting point for negotiation with inspector.
- 11) (JD) Q3, Minister can you confirm the follow statement is correct as sent in a letter to me from the Secretary of State "Local Authorities should make a realistic assessment of the number of homes their communities need, using the standard method as the starting point in the process. Once this has been established, planning to meet that need will require consideration of land availability, relevant constraints and whether the need is more appropriately met in neighbouring areas. This will be scrutinised as part of the examination undertaken by an independent Inspector."?
 - a. Response (HM), Correct.
- 12) (CR) Q1, I would like to go back to the time period a plan should cover. As Housing Minister stated a good plan was one over 10-15 years and our plan is over a minimum of 19 years. This causes the additional loss of more greenbelt in our areas and with no control over the staged release of the brownfield first, the greenbelt will be used first. Can you tell me if you have a recommended plan time period?
 - a. Response (HM), well in Oxfordshire we are planning out to 2050 because of the massive infrastructure requirement and thus investment from government, so we are needing billions of pounds for new roads and to justify the investment we need large amounts of housing. So it really comes down to the vision for a place like central Manchester that has long term plans and vision such as airport, motorway and HS3. So if we are to put all this in we must think of the housing to justify it. So we have written a cheque for Oxfordshire for hundreds of millions of pounds for infrastructure based on an extra hundred thousand homes over the target for example.
 - b. Response (HM Advisor), let me clarify, we expect you to have a plan that is reviewed every 5 years no matter what period it is over.
 - c. Response (HM), so you are going to get to the point you are losing the greenbelt anyway every 5 years, but you would not have got the investment in infrastructure if you did not have a long term plan.
- 13) (TP) Q2, we in Bury believe we have covered the 3 points for exceptional circumstances and you have stated the bar is high. Have we met the expectations?



- a. Response (HM), well the decision is not ours it is for the planning inspector, much as I would like to be in charge across the whole country, but perhaps fortunately for you I am not.
- b. Response (HM Advisor), part of the evidence base is to show that the greenbelt should still be there for the purpose it was there in the first place to prevent urban sprawl.
- 14) (RS) Q3, we were advised by the inspector last time to withdraw our plan that protected the greenbelt?
 - a. Response (HM Advisor), well, since you submitted the plan we have changed some of the processes around the assessment. The problem we said during the last NPPF was that we wanted the best plan submitted, and not a plan. So the problem we had was the inspector kept saying you cannot show me this is the best plan which became a purist argument.
- 15) (IL) Q4, so you say you want us to create a plan for maximum housing and protect the greenbelt when we have exhausted the brownfield sites, what trumps what?
 - a. Response (HM Advisor), In the NPPF the need for housing does not automatically trump the greenbelt. Does the green belt serve a purpose to separate two villages and not just a small lump of land.
 - b. Response (HM), we had an example of a piece of greenbelt that was trapped by motorways all round it and cut off and felt justified in releasing it for housing as it was not separating villages.
- 16) (CR) Q2, Well Bury are releasing under the GMSF our greenbelt status to our local dump which you may have seen during the search for the Manchester Bombers suitcase, and our motorway verges, so obviously greenbelt is there to protect urban sprawl, so is there a rule that stipulates the movement of green belt status has to be to a meaning full location or not?
 - a. No response from (HM) or (Advisors) (silence, shocked faces!).
- 17) (JF) Q3, then just repeated the question about us having to meet the high bar of housing numbers for Bury and we should have dispensation?
 - a. Response (HM), we cannot comment on specific cases, and understand how difficult these decisions are. However I will leave you with one question which I have to ask, where are all the people supposed to go nationally?
- 18) Meeting ended.



The Friends of Bury Folk Conclusions:-

- 1) All is not lost and we can still fight for our greenbelt.
- 2) It is now fact that the starting point for the housing requirement are the 2014 figures.
- 3) It is fact that a local council or a larger combined authority can mitigate the either up or down on the housing requirement against the 2014 figure starting point.
- 4) The housing requirement does not automatically trump the need to retain our greenbelt and it should remain protected as long as possible. To protect it, it must remain to fulfil is its purpose of preventing urban sprawl.
- 5) Two types of approaches to lowering the housing figures in a local plan are:
 - a. Argue your own starting figure in your own plan, this requires you to mitigate the following exceptional circumstances:
 - i. Local economic shock (large employer closing) or a period of economic change (Brexit?).
 - ii. Fully explored the density requirements on the areas you have.
 - iii. Fully explored the use of brownfield and public land that you have.
 - b. Propose a need based argument starting with the 2014 housing requirement, this requires you to mitigate the following exceptional circumstances:
 - i. Fully identify and allocate all your available brownfield sites to housing need in your local plan.
 - ii. Fully explored the density requirements on the areas you have allocated.
 - iii. Fully explore cooperating with all your neighbouring areas and further areas afield taking your housing need.
- 6) Problems for Bury to pass inspection:
 - a. Now we have opted out of our own local plan due to the belief it would not be accepted as a previous version was rejected (this was a mistake as the assessment is now different) we are now linked to the GM plan and thus Bury must convince the GMCA to accept our lower figures if we want to protect our greenbelt under exceptional circumstances and state this in the overall plan for GM.
 - b. Bury have to evidence and attempt to cooperate with other areas not just GMCA to take some of our housing requirement.
 - c. Bury are not expecting to see directly any major infrastructure gains which the GMCA are looking for such as HS3 and the sums of money are great if the GMCA do not achieve the housing figures, in fact they are expected to exceed them to get the investment.
 - d. Bury must accurately map all its available brownfield sites and allocate as much density as possible along with housing variability need for the demographic.
- 7) Finally Bury does have a strong case for maintaining its green belt to protect urban sprawl as each site allocated will lose its separation such as Walshaw to Bury &Tottington, Elton between Bury and Radcliffe, Simister to Bury. This we must keep fighting for.