

16 January 2017

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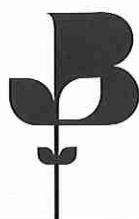
To whom it may concern

### **Greater Manchester Spatial Framework**

Greater Manchester Chamber of Commerce (GMCC) is the UK's largest accredited Chamber, representing over 4,800 businesses that together employ over 350,000 people, around one-third of the working population of the country's largest area of economic activity outside London and the South East. GMCC is a not-for-profit private company, working proactively to create a better business environment for its members by helping to connect them to business opportunities in Greater Manchester, the UK and across the globe.

GMCC welcomes the opportunity to respond to the consultation on the draft Greater Manchester Spatial Framework (GMSF). The GMSF is an important first step in developing the future ambitions of the city region through a co-ordinated approach to land use, but we have some concerns over its deliverability. We feel unable to comment on the detailed aspects of the report around the proposed direct allocation of land within the framework for reasons that we will discuss in this response. Because of this, our response is focused on the high-level strategy itself, and particularly on the way that this strategy feels disconnected from other strategies being developed across Greater Manchester.

Our major criticism of the GMSF is, in general, the disconnect between land use allocation and provision of services, whether of social, physical or digital infrastructure. It is our belief that, in major conurbations in the 21st century, it is not possible, or even realistic, to develop a future land use strategy without thoroughly assessing these other services. The identification of existing infrastructure deficiencies and the outlining of the investment, improvements and other mitigations required in order to facilitate the development being proposed is critical to a comprehensive planning strategy. The GMSF is, in this regard, lacking in significant levels of detail. In light of this, we believe that the current approach is flawed and, in its present state, does not reflect global 'best practice' in urban planning, nor does it adequately reflect the increasing trend towards 'smart cities.'



TfGM estimates that traffic congestion in Greater Manchester is costing our city region's economy around £1.3 billion per annum, an equivalent of over 2% of lost economic output overall. Businesses across Greater Manchester are being financially penalised because of this already, caused by the fact that infrastructure investment and delivery – physical, digital, and social – has not expanded at the rates necessary to keep pace with the wider and strong levels of growth that the city region has experienced over the past decade or more. The GMSF in its current form, and other strategic documents for the city region's future development, provide few answers as to how the current deficit in infrastructure provision will be solved. But unless we know how the existing problems are going to be solved in the short term, we cannot reasonably be expected to comment on the allocation of any of the strategic land or housing sites within the framework, and this is further compounded by the lack of additional assets to support the land use plans being brought forward for consideration under the GMSF.

We fully understand both that infrastructure provision is not the purpose of this framework, and that co-ordinating this provision is complicated, in part by the number of local, regional and national agencies involved. We understand also that the investment funding for the delivery of the infrastructure that we note is lacking in the GMSF mostly falls to agencies outside Greater Manchester and that the GMCA may feel challenged by proposing infrastructure developments in this report over which it has little or no control in terms of their financing and delivery. However, the Chamber has, for a number of years, been calling for an integrated planning approach which indicates how Greater Manchester's existing problems are going to be solved and how future development can be enabled and these are largely issues that cannot be dealt with by Local Plans.

The success of this city region as it continues to grow and expand over the coming decades will be predicated not only on the availability of housing and employment land, but also on the quality of services, both hard infrastructure and social support, that can be developed to support and sustain them. Even though GMCA currently has little control over the delivery of these schemes, it should be bold and, within its key strategic documents, make clear the schemes that it believes are required to support each major development, having due regard to the current levels of infrastructure already in place, as well as those required to serve either the expansion of existing sites or the development of new ones. Only in being bold, and making a clear statement to national government and its agencies, of the investments required to successfully deliver its growth ambitions, can Greater Manchester truly succeed in bringing about a large-scale strategic plan such as this.

For these reasons, therefore, we cannot assess the viability of the release of any land, whether for housing or industry/employment without knowing whether those areas are physically capable of managing that land use without huge disruption, inconvenience, cost to the business community and compounding of existing difficulties. We recognise that the framework mentions throughout the need for physical infrastructure to release land for development, but these statements appear to be both generalised and aspirational.

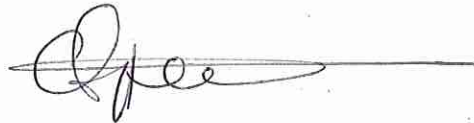
We believe that there is a strong possibility that the GMSF will, by legitimising the development of the Strategic Land and Housing Sites, encourage developers to submit planning applications which will then be difficult to refuse and which will result in further congestion, related air pollution and increased costs to businesses in Greater Manchester.

We are aware of the difficulties involved but we call for a strengthened approach where each of the areas allocated for further development is subject, within the GMSF, to a fuller assessment of current provision to them in terms of social infrastructure, transport infrastructure (including buses, light rail, heavy rail, cycle paths and both local and major roads), energy and digital infrastructure, together with a clear statement of what infrastructure needs be in the future in order for development to be acceptable. This should also include what agencies are responsible for that infrastructure provision and a clear statement that these needs have to be met before further development is to be allowed.

Greater Manchester Chamber of Commerce stands ready to work closely with the GMCA and its associated agencies to bring forth this plan, and will continue to work to deliver the best possible economic potential for its businesses and residents alike in the future.

If you would like to discuss any aspect of this response in more detail, please contact, in the first instance, Chris Fletcher, Director of Policy & Marketing, on 0161 393 4333 or email [chris.fletcher@gmchamber.co.uk](mailto:chris.fletcher@gmchamber.co.uk).

Yours faithfully



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