

BPF response to the revised draft Greater Manchester Spatial Framework



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The British Property Federation

1. The British Property Federation (BPF) represents the real estate sector – an industry with a market value of £900bn which contributed more than £60bn to the economy in 2016ⁱ. We promote the interests of those with a stake in the UK built environment, and our membership comprises a broad range of owners, managers and developers of real estate as well as those who support them. Their investments help drive the UK's economic success; provide essential infrastructure and create great places where people can live, work and relax.
2. We welcome the opportunity to respond to the revised draft Greater Manchester Spatial Framework (GMSF). It is encouraging to see that the revised draft now sets out an ambitious target for industrial and warehousing floorspace. This approach should not only facilitate further investment and create more jobs but also provide a basis for the region to take on more housing growth in the future. Indeed, the BPF have recently published a [research report](#) with planning consultancy Turley which explores the inextricable link between housing and the logistics sector and the importance of infrastructure to connect them. More broadly, we would also like to see greater reference to how the GMSF plans to deliver and fund the infrastructure that will be necessary for the framework to deliver on its ambitions for the region in practice.
3. Despite the confident and strategic approach taken towards the allocation of industrial land in the GMSF, we are disappointed in the specific approach pursued in relation to residential development. We are particularly concerned that the annual housing target has reduced by 7% since the 2016 draft and continue to be of the view that there is a capacity and a desire to deliver much more housing in the Greater Manchester region to support the northern powerhouse.
4. Further, we would argue that the GMSF relies too heavily on building new homes for sale at the expense of other types of housing such as build-to-rent (BTR) and specialist housing for older people. Indeed, the BTR sector has seen rapid growth in recent years and Greater Manchester, in particular, is a region that has seen significant increases in BTR development. Now that the BTR sector has been formally recognised in national planning policy (through the 2018 NPPF reforms) and that government continue to make clear that in order to alleviate the housing crisis, there is a need for authorities to pursue a mixed tenure approach, it is our hope that officials at the GMCA will revisit the precise housing mix which is needed and in particular pay more attention to the potential advantages of greater reference to BTR in the framework.
5. The rest of this response sets out the BPF's views on specific chapters within the GMSF. We have decided to focus on five key areas of the framework - Chapter 4 - Strategy, Chapter 5 – Sustainability, Chapter 6- Economic Prosperity, Chapter 7 -Housing and Chapter 12- Plan Delivery. It is our hope that the comments we set out below are of value to GMCA officials reviewing the framework and we look forward to future engagement on this front when the final consultation is released later this year.

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Chapter 4: Our Strategy

6. As a national body we won't comment on specific Greater Manchester spatial matters, but Chapter 4 as whole appears to deliver a coherent strategy that meets the two main aspirations highlighted at the start of the chapter, to:
 - Make the most of the key locations and assets best-placed to support economic growth;
 - and create more favourable conditions for growth by providing high quality investment opportunities across Greater Manchester that help to address disparities.
7. However, there are three general points that we would wish to highlight in the chapter:
8. Little is said of social infrastructure, and how that will be funded and spatially provided for. The framework, for example, identifies the potential for 50,000 new homes in the City Centre - the equivalent of a largish new town, but nothing is said of the extra schooling, healthcare, leisure and other demands that will bring. Will the intention be to use existing resources more intensively, or provide new ones? Probably some combination of the two, but nevertheless it will have land use implications. Generally, the more specific the plan can be about this, the more reassurance it gives the existing population that their existing social infrastructure will not be overstretched.
9. The City Region's Universities are mentioned as a key asset, but little is said beyond that. We know from our interaction with other cities that universities can often act in silos from local planners and therefore when they wish to expand, and provide for additional students, that comes as something of a surprise to the local council and creates friction. What are the aspirations of the City's universities? Are they consolidating, or wishing to expand, and if so, by how much? How should the City best plan for their growth, if that is their ambition? If they are considering growth, would they consider campuses in other parts of the City region, which may help address some disparities between different areas? What are their ambitions to incubate businesses and help foster start-ups?
10. We would like to see far more evidence of a dialogue between the universities and the Combined Authority in the framework We are sure that exists, but it needs to be brought out in the framework, as it could have important spatial implications.
11. There needs to be a better holistic understanding of the employment uses the framework is planning for, the housing being planned for, and social infrastructure. For example, policy on the Main Town Centres (Policy GM-Strat 12) is generally sound in seeking to intensify residential use and therefore provide a population that can support other town centre uses, but also use good transport links in to the City Centre. High density urban living and commuting, however, will cater for some parts of the population, but not others. It is important that the framework considers specific needs for housing, as paragraph 61 of the new NPPF requires of local authorities (for older people, families, those that need to rent privately, want to self-build, etc) and whether the identified opportunities will likely match all demands, or lead to a surplus in some kinds of accommodation, and deficit in others.

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Chapter 5: A Sustainable and Resilient Greater Manchester

GM-S 1 - Sustainable Development

12. *Mostly Agree*

13. We support the broad intent of this policy and in particular its convergence with the definition of sustainable development provided in the National Planning Policy Framework (NPPF, 2018). Ensuring that development addresses the economic, social, and environmental needs and aspirations of an area in tandem, will lead to better and more sustainable outcomes. If we are to deliver on the quantitative targets of the plan and those set by central government, equal thought should be given to the quality of the built environment that is delivered. Considering environmental and social gain in tandem with economic benefit will not only ensure the protection and enhancement of our natural environment and communities but will also present an opportunity to enhance economic output through new technologies, occupations, and sustainable practices.

14. With regard to the brownfield-first preference outlined within Policy GM-S 1, this is again in line with the content and aspirations of the NPPF (2018), by way of making as much use as possible of previously-developed land. Whilst we acknowledge the policy is worded to highlight a preference for brownfield-first development we would note the important role that greenfield land and suitable land under alternative designations can have in fulfilling the needs of Greater Manchester. Conversely, the appropriate care should be taken when weighting the development potential of brownfield sites, as not all previously developed land should be considered suitable for development. We believe the policies within the draft GMSF allow for the respective level of flexibility but would take this opportunity to highlight the importance of assessing the multifaceted merit of individual development sites during the local planning process.

GM-S 2 - Carbon and Energy

15. *Mostly Agree*

16. We welcome the strong and ambitious commitment to deliver significant carbon reductions through planning and development into the future. With all public and private sector stakeholder pulling in the same direction, we stand the best chance of mitigating and adapting to the challenges of climate change. Whilst the aspiration to deliver a carbon neutral Greater Manchester by 2038 is commendable, it is important that any targets set, are both realistic and achievable for developers, to deliver the necessary homes and infrastructure to meet Greater Manchester's needs. The overall target, therefore, needs to be fully tested and evidenced to ensure it is achievable.

17. The interim requirements to seek a 19% carbon reduction over Part L of 2013 regulations is broadly supported as it is in line with the national policy requirement to move towards a low carbon future. However, it appears this policy only relates to dwellings and therefore it is unclear what non-domestic buildings need to target. It is also highly likely that the Government will improve the

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Building Regulations further over the lifetime of the GMSF (a review is expected, although delayed to later in 2019) and therefore the policy should be flexible and allow for such improvements in national standards over time. We therefore suggest that this part of the policy should be re-written along the lines of *“With an interim requirement that all new dwellings should seek a 19% carbon reduction against Part L of the 2013 Building Regulations, or any future update to Part L that may be in force at the time”*.

18. Regarding the requirement to achieve a minimum 20% reduction in carbon emissions through onsite or nearby renewable and/or low carbon technologies, whilst we understand the intention is to drive the supply chain and measures such as building level PV, the alternative to use ‘nearby renewables’ is unclear and we would welcome further definition for clarity. We would also question the clarity of this policy in terms of whether this is additional to the 19% reductions against Part L of the Buildings Regulations 2013.
19. Policy 8 (e) relating to the introduction of carbon assessments could be a useful and productive development. However, the respective assessment methodologies are not yet mature. Careful thought should therefore be given to the inclusion of this policy prior to the establishment of acceptable methodologies, otherwise this policy may lead to inconsistent and unreliable reporting. As ever, this requirement, if introduced should be assessed to ensure it is proportionate and viable.
20. Whilst not directly referenced under this policy nor in this chapter of the GMSF, we would like to take the opportunity to raise the issue of carbon and energy policies/objectives for the variety of sectors. Namely, with the high aspirations outlined in this chapter and the significant carbon emissions associated with the sector, we would suggest that thought must be given to the sustainability of NHS healthcare infrastructure. Nationally, the health service has done great work to reduce emissions from its estate and operations. Given Greater Manchester’s ambitions to become carbon-neutral by 2038, we would encourage the spatial framework team to consider the role that healthcare infrastructure can play in minimising emissions and maximising sustainable outcomes by way of the built environment and public health.

GM-S 3 - Heat and Energy Networks

21. *Neither agree or disagree*
22. We acknowledge that according to central government analysis, heat networks have been identified as cost-effective solutions to decarbonising heating in areas of high heat density. Notwithstanding representations we have made on the complexities of these solutions (we encourage the GMSF team to view the [BPF’s Response](#) to A future framework for heat in buildings, 2018). We would take this opportunity to make a number of comments on the content of policy GM-S 3 and would highlight the need to reassess the viability of delivery and connection to heat networks in particular.
23. This policy relates to both ‘heat’ and ‘energy’ networks (the latter assumed to be low/zero carbon electricity networks). Given these two network types differ markedly in several areas including their suitability to different development types/scales, their potential energy sources, and their capital costs and hence their associated viability, we suggest that thought should be given to addressing them separately within this policy. Both ‘Heat and Energy Network Opportunity Areas’

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and 'Heat Network Opportunity Areas' are referenced within this policy section. To this effect we note that figure 5.1 relates to 'Heat and energy network opportunities', but the key only refers to heat network opportunities.

24. The threshold for the requirement to evaluate viability of new residential developments over 10 dwellings or other developments over 1,000m² floorspace is considered sensible in its convergence with the definition of major development within national planning policy. However, we would suggest that the scope for the justification and requirements of 'decentralised heat/energy network viability assessments' should be set out in detailed guidance that builds on points a-g under section 3 of this policy. Further, it will be important that the determining authorities are equipped with the necessary resource and skills to assess the appropriateness of heat network connection. The planning process will benefit by way of efficiency if decision makers indicate the acceptability of viability assessments early on in the process to avoid unnecessary delays.
25. Finally, we provide a comment by way of seeking further clarification as to whether there will be any interface between this policy and Policy GSM-S-2 when individual planning applications are considered. This is to say that if a heat network has a renewable heat source (e.g. heat pump or biomass) then will this carbon emission reduction count towards achieving the requirement for a 20% reduction in carbon emissions through the use of on site or nearby renewable and/or low carbon technologies?

GM-S 4 - Resilience

26. *Agree*
27. We support the tenets of this policy and particularly welcome the acknowledgement that "planning for resilience has to be all-embracing" and that "many elements of this plan have a role to play". Both natural and societal challenges will inevitably shift the ways in which our cities, towns, and communities operate, and given the significant role that the built environment will play in ensuring sustainable places, we are encouraged to see that the GMSF is advocating a joined up approach.
28. Furthermore, policy GM-S 4 has been drafted in line with the respective national policy requirements, which will help to ensure a consistent approach across the board. Some additional support could however be provided to help in this endeavour. We have received representations noting that a precedence is beginning to develop around the country by which development projects have been refused and the decision upheld at appeal due to a lack of adaptation/resilience provision. We would therefore welcome clearer guidance either through policy or separate means to help applicants respond to this.
29. We would finally add that there may be scope to reference indoor environments, user comfort, and occupant wellbeing in this policy, helping to encourage better thinking around the sustainable operation of buildings.

GM-S 5 - Flood Risk and water Environment

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30. *Agree*

31. We support the content and intent of this policy.

GM-S 6 - Clean Air

32. *Mostly agree*

33. We are supportive of this policy, however we would request further detail regarding the requirement for electric vehicle charging points in new development, as this will have to be factored into the design, layout, and viability of a given development from an early stage. We would also note the programme of urban intensification and densification set out in the GMSF may serve to exacerbate exposure to poor air quality through the 'canyon effect' where air pollution is trapped at ground level. Further thought should be given to this possibility.

34. We commended the fact that the Greater Manchester authorities have worked collaboratively to produce an Air Quality Action Plan, however, as noted in Paragraph 5.32 under policy GM-S 6, the Government has since directed the Greater Manchester authorities to take urgent action that goes over and above this Plan. This should therefore be refreshed so that there is a consistent blanket approach to be followed across the board.

35. We would also like to express our support for point 7 under policy GM-S 6. Planning for and delivering a more sustainable structure for the distribution of goods within the urban area will serve to minimise the impacts of vehicular emissions whilst offering employment opportunities and embracing new technologies. In particular, delivering logistics infrastructure in the right locations can be crucial to a sustainable modern economy and environment. For instance, one delivery vehicle (acting on behalf of an online grocer) can take 23/24 customer vehicle trips off the road. The BPF have explored the strategic, economic, and societal benefits of correctly locating industrial and logistical infrastructure through our recent report [What Warehousing Where?](#)

GM-S 7 - Resource Efficiency

36. *Agree*

37. We support this policy and we are particularly pleased to see that the GMCA will seek to produce a Resource Strategy, and that reference is made to pursuing a circular and zero-waste economy.

Chapter 6: A Prosperous Greater Manchester

Policy GM-P 1

38. *Agree*

39. We welcome the commitment the GMCA has made to supporting long-term economic growth and applaud the intention to utilise Manchester's already world-leading prime sectors to achieve this.

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40. The firm recognition of the role the industrial and logistics sectors will play in delivering that growth is particularly commendable, given the ever-increasing role they play in helping meet changing consumer habits and retail needs.
41. In addition to this, the identification of graduates as one of Greater Manchester's major assets is astute. Greater Manchester has one of the largest concentrations of students in Europe and these students have the potential to fulfil the GMCA's ambitions to grow the region's advanced manufacturing and professional services sectors once they've graduated.
42. The GMCA should note however that if Manchester is to be an attractive place for recent graduates to remain, it must continue to be nurturing of its existing student population and should encourage residential development that reflects both student and graduate demand.
43. In this regard, we welcome Policy GM-E 4 commitment to continuing to develop Greater Manchester as the UK's best destination for students, yet stress that this is only achievable through the city sustaining its accommodating approach to Purpose-Built Student Accommodation (PBSA).
44. PBSA is often preferred by students to other residential options and takes pressure off of the private rented sector. PBSA is also extremely attractive to international students since it can be bought online and offers clear assurances over quality. If Greater Manchester is to continue to attract international students, the GMCA should encourage PBSA development as much as possible.
45. Build-to-rent (BTR) too is often an attractive form of accommodation for young professionals and, as set out elsewhere in our response, should be encouraged by GMSF policy if Greater Manchester is to make the most of and expand further its pool of graduates and researchers. By utilising BTR and PBSA, Greater Manchester can fulfil GMP1's intention to provide the high-quality, sustainable living environments that will help to attract and retain skilled workers.

[1] <https://content.knightfrank.com/research/1663/documents/en/knight-frank-ucas-student-housing-survey-201819-6002.pdf>

Policy GM-P 2

46. *Agree*
47. As stated previously, the BPF, as a national body, is not well-placed to comment on specific Greater Manchester spatial matters. We therefore have no comment on whether the new employment sites and premises to be brought forward are in fact in what we would deem to be strategic locations.
48. We do though generally welcome the intention to improve productivity and support growth with modern buildings. The GMCA should also be commended for recognising that Greater Manchester needs a sufficient variety of employment sites in terms of cost and location to maximise its ability

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to attract investment. Given the mutual dependence of all types of businesses and the broad range of resident skills sets, this economic diversity should be reflected in the city's office space offering if Greater Manchester is to have the dynamic business environment it seeks.

49. Again, though we would not comment on the value of specific Green-belt areas in Greater Manchester, we do welcome the GMCA's decision to undertake a selective removal of land from the Green Belt to provide the quality land supply necessary to deliver long-term economic growth. The BPF have a long tradition of supporting brownfield-first policies, however, we caution that protection of what may be arbitrary green land with little significant environmental value over potential sites that could contribute to economic prosperity should be avoided. We encourage the GMCA to take a strategic view on the Green Belt. Particular attention should be paid to making better use of transport corridors that pass through it and assisting the continued development of the region's vital industrial and logistics sectors.

Policy GM-P 3

50. *Agree*

51. As in our previous answer, the BPF is not in a position to comment on specific spatial choices in Greater Manchester. We do note though that that developments such as MediaCityUK and Airport City appear to have been incredibly successful in attracting occupiers.

52. More generally, we support the GMSF's intention to encourage new office space in town centres. As the recent [Centre for Cities' City Centres: past, present and future report](#) outlined, Manchester city centre has had a resurgence in recent years, in part because it has been able to offer such an attractive working environment with a good supply of quality office space. We agree with the same report's conclusion that Manchester will need to continue ensuring there is enough commercial space available to meet the demands of future growth, and we welcome the ambitious target of at least 2,40,000 sqm of new office space between 2018-37.

53. The GMCA should also recognise the growing demand from businesses for flexible workspace solutions and should ensure its policies are hospitable to this innovative new form of office product.

Policy GM-P 4

54. *Mostly agree*

55. The industrial and logistics sectors are already one of Greater Manchester's greatest strengths. We are however in full agreement with the GMCA that the long-term economic success of Greater Manchester will depend on its ability to continually renew and enhance its supply of industrial and warehousing premises.

56. Our recently released [What Warehousing Where](#) report found that the North West has a relatively impressive 80-90sqft of warehousing space per household. However, assuming the originally

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proposed 227,200 homes to be built between 2015 and 2035, approximately 19,400,000 sqft more industrial space will be needed in Greater Manchester just to keep pace with the growing housing stock. The ambitious minimum 4,220,000sqm target is therefore welcome, but it is also imperative that Greater Manchester continues to provide a stimulating environment for the industrial sector to expand by properly supporting its connected sectors and supporting infrastructure.

57. Much of Greater Manchester's past logistic and industrial success can be attributed to its relatively good motorway connections, strong rail freight and port connectivity, its relatively high proportion of logistics properties measuring over 250,000 sqft in floorspace, and its central location in the country. It is therefore crucial that these advantages are maintained through strategic investment and that the GMCA appreciates the need to put logistics at the heart of other key policies. Our 2015 [Delivering the Goods](#) report, for example, found that the majority of logistics employees live within 15 miles of their work, and therefore, we recommend that the GMSF's strong logistics/industrial sector ambitions are matched with considered housing land allocations.
58. We do also caution the GMCA that when setting out its considerable ambitions for these sectors it does not fall into the trap of restricting development with overly prescriptive policies. Overnight parking for heavy goods vehicles, units capable of accommodating small and medium sized enterprises and specific opportunities for advanced manufacturing businesses are of course of crucial importance but shouldn't be prioritised over the core functions of industrial and logistics space. It is therefore welcome that the policy outlined requiring individual sites providing more than 100,000 sqm of industrial and warehousing floorspace to provide these facilities is caveated with considerations for demand and location, though shouldn't be limited to these.

Do you have any comments about a prosperous Greater Manchester?

59. The Greater Manchester Digital Strategy 2018-2020 which sits alongside the GMSF is welcome and contains numerous measures the BPF feels may encourage economic development and ensure a prosperous Greater Manchester.
60. Of especial note, we are encouraged to see that the GMCA intends to produce a standardised wayleave for Greater Manchester. This will hopefully provide greater clarity for landowners, as the heterogeneity of wayleave requests causes confusion and a significant time and resource expense. The City of London have recently produced an exemplary standardised wayleave template that reflects the provisions in the new Electronic Communications Code, and where it has been used, it has been successful. We would encourage the GMCA to engage with both local and national property stakeholders on the development of this wayleave standard so that it reflects both sector and local needs and so that it is used often and effectively once published.

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Chapter 7: Homes for Greater Manchester

GM-H1 and GM-H2

61. We largely agree with the intentions of this policy and welcome the approach to achieve a minimum number of homes annually in accordance with local housing need calculations. We also welcome the aim to deliver at least 50,000 new affordable homes with a proportion set aside for social or affordable rent. However, we would also reiterate the point made in previous rounds of consultation that there is a capacity and a desire to deliver much more housing in the Greater Manchester region to support the northern powerhouse.
62. Further, there is still a question over how the figures outlined in the framework will be achieved. The GMSF notes that the requirement for Greater Manchester of 10,580 net additional homes per annum has only been achieved twice over the past few years which has inevitably led to an increasing shortfall in available housing for the local population, particularly post 2008 when fewer than 4000 homes were built. As noted, achieving the scale that is required to meet the housing targets set, will require a significant injection of Government support and funding which will take some time to build. If this is indeed the case, we would question what process has been put in place to help deliver this aim in the interim and what contingency will there be should Government funding not meet the needs of development.
63. Whilst we appreciate that development should concentrate on areas of need, we would urge caution at being too prescriptive with regards to location density. There is an assumption that homes will be delivered on all sites allocated for housing, and a realistic approach to encouraging and incentivising this level of supply should be included. We would appreciate further detail on how all of these sites were allocated and, if they are owned by developers, to what extent they are seen as fully deliverable. There is a risk of market saturation if the distribution of housing is not well spread and carefully thought through.

GM-H3

64. It is right that the GMSF acknowledges the need for mixed size, type and design of new housing. Quality should not be sacrificed in favour of quantity; creating the places where people want to live, not only in respect of the area but the types of housing that is available, is integral to delivering mixed and inclusive communities.
65. We agree that there should be a stronger focus on specialist housing for older people. There is a lack of adequate housing serving older people across the UK and many believe they would downsize if the appropriate properties existed. This lack of suitable housing for older people has a clear impact on those lower down the housing ladder, with larger family homes owned and occupied by older people only becoming available when someone passes away. Therefore, we are encouraged to see that the Framework has acknowledged this issue with a view to creating sufficient provision for the local population.

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66. However, we feel that the GMSF relies too heavily on building new homes for sale and this may not be appropriate for those who are unable to buy. Build to Rent (BTR), as a sector, has seen rapid growth in recent years and, regionally across the UK, Manchester has seen significant increases in BTR developments. Research carried out by the BPF and Savills noted that for the end of 2018, the number of completed BTR units stood at 5798 with a further 17,634 in the pipeline.¹ The numbers follow a significant year of new housing policy from the Government, including a revised National Planning Policy Framework (NPPF) that now references BTR specifically, to provide guidance for local authorities when dealing with planning applications from the sector. Furthermore, as the sector continues to grow, it has also been able to diversify its offer to include houses, rather than just typical high-rise apartments thereby meeting the needs of changing demographics.
67. The Government has made it clear that in order to alleviate the housing crisis, a holistic approach is required; a mix of tenure, be they owner occupation or renting, must go hand in hand in order to help deliver the homes that are needed and the BTR sector has a major role to play in this. Whilst it is still the aspiration of many to own their own home, this cannot always be the case and as such, renting, both through institutional providers and the traditional Private Rented Sector, provides a viable and realistic option for many. We would therefore urge that the GMSF takes further consideration of the advantages of the BTR sector and its potential contribution to helping shape the Framework's policy.

GM-H4

68. We agree with the statements that to accommodate more growth, every development must make the most efficient use of land and we accept that this will mean building at higher density. However, communities will only accept such development if it is demonstrated that local services and infrastructure will be adequate to support the additional homes being delivered. Inadequate planning or funding of infrastructure, including school places, healthcare or leisure facilities, will inevitably create animosity towards proposed developments.

Chapter 12: Delivering the Plan

The delivery of healthcare infrastructure in Greater Manchester

69. We note that Greater Manchester is unique in the devolved powers it possesses to plan and deliver health and care services, and that good leadership has been exhibited in this regard. The Greater Manchester Health and Social Care Partnership strategy talks of “the crucial link between the development of local and GM wide estates solutions and the transformation of health and care as a result of the GM transformational themes”. In this context, we would argue that reference to the ambition of improving healthcare infrastructure within the GMSF could be strengthened within the spatial framework. In this regard we would point to sections 1,2, and 3 of Policy GM-E 5. This aspect of the policy appears to be reactive more so than strategic, in that it is mitigating

¹ Build to Rent data, BPF/Savills, Q4 2018.

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the impacts of development in contrast to the proactive transformational approach taken within the Greater Manchester Health and Social Care Partnership strategy referenced above.

70. Given the significant challenges facing the sustainability of the NHS estate - by way of ensuring fit for purpose infrastructure to deliver improved health outcomes - we would suggest that a greater reference should be made to the GM Estates Strategy within this plan. Such reference may help to facilitate greater investment in the associated healthcare infrastructure and promote an increased level of public/private partnership to this effect.

The future introduction of a Strategic Infrastructure Tariff in Greater Manchester.

71. We note that subject to an agreement with central government, the GMCA could, in due course, have the power to levy a strategic infrastructure tariff (SIT) to fund strategic infrastructure projects across the combined authority region.
72. The principle of combined authorities being able to introduce a SIT to fund strategic infrastructure is something that the BPF have supported in areas where land values can support such a charge.
73. For example, Mayoral CIL for helping to fund Crossrail 1 is in effect such a SIT and it has worked relatively well in London where higher land values make such a charge workable (and the charge to date has been set at a relatively low level). However, in other parts of the country where the value and price of land is significantly lower, there is the danger that the introduction of a SIT at a too higher level could stifle development activity by making schemes unviable. These considerations appear to be applicable for the Greater Manchester region - that only one authority across Greater Manchester has progressed work sufficiently to implement a localised CIL charging schedule (Trafford) to date demonstrates the point that there may simply not be further value to capture through the planning process.
74. Further, more generally, we would make the point that support for a SIT will typically be greater when a direct link between a specific piece of infrastructure and the funds raised for it through the tariff is clearly established. Experience has shown this is a critical factor in fostering greater levels of support from the private sector (as the Mayoral CIL and Crossrail 1 in London has demonstrated).

ⁱ Property Data Report 2017, Property Industry Alliance