



CABINET: 12 MARCH 2019

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**Report of:** Director of Development and Regeneration

**Relevant Portfolio Holder:** Councillor John Hodson

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**SUBJECT: GREATER MANCHESTER SPATIAL FRAMEWORK REVISED DRAFT**

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Wards affected: none (directly) – neighbouring authority consultation

## **1.0 PURPOSE OF THE REPORT**

1.1 To seek approval of proposed Council response to the consultation on the Greater Manchester Spatial Framework (GMSF) Revised Draft.

## **2.0 RECOMMENDATION**

2.1 That the comments at paragraph 4.10 be approved for submission to the Greater Manchester Combined Authority.

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## **3.0 BACKGROUND**

3.1 The ten local authorities that make up the Greater Manchester City Region first consulted on a draft GMSF in October 2016. Since then, there have been many changes in the governance of the City Region, including the creation of the Greater Manchester Combined Authority (GMCA) and the election of the first City Region Mayor covering Greater Manchester (Andy Burnham). As a result, the responsibility for preparing the GMSF now falls to the GMCA and the GMCA are now consulting on a Revised Draft of the GMSF.

- 3.2 The GMSF will ultimately form a strategic part of the Development Plans of each of the 10 local planning authorities in Greater Manchester, setting planning policy on strategic planning matters which each Authority's Local Plan will need to sit under and be in conformity with, and allocating strategic sites for new development, including releasing some from the Green Belt. As such, the GMSF will be subject to an Examination by a Planning Inspector in due course in the same way a Local Plan would be.
- 3.3 For this reason, and under the Duty to Co-operate as a neighbouring authority, it is important that this Council considers the Revised Draft GMSF and whether it will have any impacts on West Lancashire that would cause the Council to make comment on the GMSF or even object to any part of it, as it is the strategic matters that the GMSF covers (alongside any localised allocations near to West Lancashire's boundary) that are most likely to have an impact on West Lancashire.
- 3.4 The "tagline" for the GMSF is "Greater Manchester's Plan for Homes, Jobs and the Environment", and this really sums up what strategic matters the GMSF covers, including setting the requirements for new housing and employment development across Greater Manchester, and setting strategic planning policies for environmental matters and transport and infrastructure provision.
- 3.5 The Revised Draft GMSF focuses on making the most of Greater Manchester's brownfield sites, prioritising redevelopment of town centres and other sustainable locations. It also seeks to help to address the housing crisis with a minimum target of 50,000 additional affordable homes – 30,000 of which will be social housing.
- 3.6 Compared to the previous draft of the GMSF, the net loss of Green Belt has been reduced by more than half (through a combination of a smaller housing requirement and seeking higher density development in appropriate locations) and the city-region has made clear its opposition to Shale Gas exploration (fracking) in Greater Manchester.
- 3.7 The GMSF also makes it clear that transport and wider infrastructure will be critical to the success of the new plan, and the GMCA have also published Greater Manchester's 2040 Transport Strategy Delivery Plan alongside the GMSF. This plan sets out all the transport improvements to be implemented by 2025, as well as longer-term plans that will support the GMSF. This coordinated, strategic approach will also help Greater Manchester make the case to government for additional funding to invest in the city-region's transport and infrastructure network.

#### **4.0 IMPLICATIONS FOR WEST LANCASHIRE**

- 4.1 In terms of the content of the GMSF (which will cover the period 2018-2037), there is not a great deal in the document that would have a dramatic, direct

impact on West Lancashire, although West Lancashire residents and businesses are likely to benefit from being so close to a Greater Manchester City Region that is thriving and successful, which is what the GMSF is seeking to achieve.

- 4.2 The matters within the GMSF most likely to have implications for West Lancashire relate to the actual housing and employment development requirements proposed for Greater Manchester (and particularly our neighbour Wigan) and any infrastructure (especially transport-related) improvements.
- 4.3 On transport strategy, the Greater Manchester Transport Strategy 2040 was published in February 2017, and this is intended to facilitate the transport needs that will be generated by the GMSF, but none of the projects thus far proposed in the Transport Strategy Delivery Plans directly affect or benefit West Lancashire, except the planned Link Road from J26 of the M6 into Wigan, which will create an easier way to travel into Wigan for those coming off the M58 and J26 of the M6.
- 4.4 In relation to employment development in the Revised Draft GMSF, it proposes a requirement of at least 2,460,000 sqm of new office floorspace and at least 4,220,000 sqm of new industrial and warehousing floorspace across Greater Manchester over the period 2018-2037, which are similar figures to those proposed in the original draft GMSF in 2016, and both of which already include a significant margin on top of the calculated need for employment development. However, the land that has been identified and allocated for such developments in the GMSF totals 2,892,705 sqm and 5,358,041 sqm respectively, which is substantially more than the minimum requirement (and so even greater compared to the calculated need for employment development without the already generous margin that has gone into the employment development requirements).
- 4.5 In and of itself, this is not a significant issue for West Lancashire, and it is a reasonable approach to allocate more land than is needed to meet the employment development requirement to create competition and choice in the employment land market, and be able to respond to any sudden upturn in demand for employment space. However, in the event of such an upturn that results in far more land being developed for employment uses than the GMSF minimum requirement, it does raise a question of whether the GMSF would be able to meet all the housing demand generated by such an upturn in the availability of jobs.
- 4.6 On housing, the GMSF proposes 201,000 new homes across Greater Manchester over the period 2018-2037 (which equates to 10,580 new homes per year on average). This is somewhat lower than the previous draft of the GMSF which proposed 227,200 new homes (11,360 per year) but is based upon the Government's new standard housing methodology calculation, and so reflects the absolute minimum level of housing the 10 authorities must together provide. The anticipated level of housing supply generated in Greater Manchester to 2037 (including the proposed additional allocations in

the GMSF) totals 218,549 new homes, and so there is some potential surplus over the minimum requirement if all of these homes are built.

- 4.7 Again, in and of itself, this is not a direct issue for West Lancashire, but it does generate the question of where additional new housing would be built to accommodate those employed by new employment development if the GMSF delivers far more employment development than their minimum requirements. GMCA have not asked any neighbouring authorities to meet any of their housing need, and have not proposed any land for safeguarding for development needs beyond 2037 in the GMSF, and the housing land supply in the GMSF only realises a relatively small surplus over the minimum housing requirement (if all the houses are built), and so, at the moment, there would be pressure on the Greater Manchester Green Belt and in neighbouring authorities for more housing if employment development levels in Greater Manchester exceed the minimum requirement.
- 4.8 Looking at proposals close to West Lancashire within the GMSF, the proportion of employment and housing development requirements that Wigan will take under the GMSF appear reasonable, and these have not led to any proposed new strategic allocations close to the West Lancashire boundary other than one new employment allocation at J25 of the M6 for 140,000 sqm of industrial and warehousing development. This location has been proposed previously (and for a larger allocation) in both the original draft GMSF and the submitted Wigan Core Strategy (before the allocation was removed during the Examination), and this Council has supported its allocation due to the additional cross-boundary employment opportunities it generates.
- 4.9 However, it should be noted that this single strategic allocation is not only smaller than previously proposed, but another allocation at J26 of the M6 has been removed (compared to the original draft GMSF). As such, the GMSF does little to take advantage of the employment development potential of this strategic, cross-boundary location where the M6 and M58 interact, lending weight to the likely attractiveness of the employment development proposals that this Council has proposed in the Local Plan Review Preferred Options alongside the M58 in Skelmersdale and Bickerstaffe.
- 4.10 Taking all the above considerations together, it is proposed that the following comments are submitted as this Council's response to the Revised Draft GMSF on their online consultation platform:

*West Lancashire Borough Council are broadly supportive of the Revised Draft Greater Manchester Spatial Framework and raise no objections under the Duty to Co-operate.*

*However, the Council is concerned that there is little flexibility in the housing land supply set out at the end of Chapter 7 compared to that provided in the employment land supply in Chapter 6. Were the levels of employment development to be higher than the requirements set out in policies in GMP3 and GMP4 (i.e. maximising the available supply of employment land under the GMSF, and so leading to more jobs in Greater Manchester), there would be*

*insufficient housing land to accommodate the increased demand for housing in Greater Manchester generated by the increased provision of jobs. Therefore, consideration should be given in the GMSF as to how this potential scenario might be addressed. Failure to do so would lead to the potential for pressure for more housing land to be released in neighbouring authorities to accommodate this demand.*

*Associated with this, by only providing just enough housing land to meet the housing requirement, and bearing in mind that the GMSF would be changing Green Belt boundaries to do so, it could be argued that the GMSF would not be in accordance with paragraph 139 (c) and (e) of the recently revised NPPF, which states:*

*"When defining Green Belt boundaries, plans should: ...*

*c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period; ...*

*e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; ..."*

## **5.0 SUSTAINABILITY IMPLICATIONS**

5.1 Given there is little direct impact on West Lancashire from the Revised Draft GMSF, there are little or no sustainability implications from this report.

## **6.0 FINANCIAL AND RESOURCE IMPLICATIONS**

6.1 There are no financial or resource implications for the Council as a result of the recommendation in this report.

## **7.0 RISK ASSESSMENT**

7.1 Given that the recommendation in this report is simply to submit comments on a draft planning document produced by the GMCA, there are no risks associated with this report that would need to be assessed.

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### **Background Documents**

There are no background documents (as defined in Section 100D (5) of the Local Government Act 1972) that have been relied on to a material extent in preparing this Report.

## **Equality Impact Assessment**

There is no direct impact on members of the public, employees, elected members and / or stakeholders, therefore an Equality Impact Assessment is not required.

## **Appendices**

None