

GM Allocation 29 North of Irlam Station

Topic Paper

GMSF 2020

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Section A – Background

1. Introduction

- 1.1 The North of Irlam allocation is situated between New Moss Road and Roscoe Road and would be developed to provide a high-quality extension to the Irlam and Cadishead neighbourhood. It is located next to Irlam rail station, with services that provide easy access to the huge range of employment and leisure opportunities in the City Centre and Trafford Park. It also benefits from Northbank Industrial Park just to the south and bus routes to Port Salford and Eccles to the east. The size and location of the site means that it has the potential to accommodate a range of dwelling types, helping to meet a variety of housing needs. The additional population would help to support existing shops and services in Irlam and Cadishead, such as the nearby Lower Irlam and Cadishead local centres.
- 1.2 It will be important that the design and layout of the site effectively integrates development into the existing area and promotes community cohesion. In particular, publicly accessible recreation space, facilities, and routes through the site onto Chat Moss should be positioned so as to be accessible to both new and existing residents.
- 1.3 Most of the site has significant depths of peat across it, although this has been degraded due to decades of drainage and agricultural activity. Nevertheless, it still performs an important carbon storage function. In addition, much of the site is grade 1 agricultural land. The benefits of delivering additional housing in this accessible location (see below for details of the site selection process) are considered to outweigh the loss of the land's farming potential and carbon storage function.

2. Site Details

- 2.1 The 58.8 hectare greenfield site is an extensive area of land lying to the south of the M62, which forms part of Chat Moss, and is to the north of the existing Cadishead neighbourhood. It predominantly comprises of agricultural land that is crossed by a number of tracks, together with farm buildings, a landscaping business and a small number of dwellings. There are a series of hedgerows running across the site.
- 2.2 The site is located within the ward of Cadishead and would be an extension of existing residential development to the south of the site. The entire site is designated as Green Belt by saved unitary development plan policy EN1. Most of the site (excluding the south-east part) is located within the mosslands as identified by saved unitary development plan policy EN11. A very small area of the site (along its southern boundary) is identified as a wildlife corridor key area of search in policy EN9.

3. Proposed Development

- 3.1 The proposed allocation has capacity for around 1,100 to 1,400 dwellings and associated social and community uses. As set out at the start of the allocation policy, subject the conditions set out in the policy the site is identified for 1,100 homes. The acceptability of the final 300 homes is contingent upon further work and potentially the delivery of enhancements to the wider transport network which create additional capacity to accommodate this volume if further development.
- 3.2 Criterion 3 of the allocation policy requires that development should provide a broad mix of housing with densities increasing towards the most accessible parts of the site around Irlam Station, and include accommodation specifically targeted at older people. Having regard to this, indicatively the site would be comprised of 900 houses and 200 apartments (or 1,100 houses and 300 apartments if the full capacity of 1,400 dwellings could be justified). The precise housing mix would be informed by a masterplan/framework or Supplementary Planning Document (as required by criterion 1 of the policy), and the planning application process.
- 3.3 Criterion 4 of the policy requires that development of the site will be required to provide an affordable housing scheme equivalent to at least 25% of the dwellings on the site, and substantially more if other funding becomes available to allow for this. The indicative affordable housing tenure split on the site is for 37.5% social rented, 37.5% affordable rented and 25% shared ownership. Provision will be on-site. Viability work by Three Dragons has confirmed that the delivery of 25% affordable at the above tenures is financially viable.
- 3.4 Appendix 1 sets out the policy wording and boundary for the North of Irlam Station allocation as set out in the 2020 Publication version of the GMSF.
- 3.5 There have been a number of changes to the wording of the allocation policy between the 2019 Revised Draft Stage and the 2020 Publication stage. These changes are mainly in response to:
- Comments received to the 2019 allocation policy
 - A site specific assessment of financial viability
 - Updates to the transport evidence base (in the locality assessment¹ prepared for the site)
 - The findings of the Habitats Regulations Assessment and discussions with Natural England
- 3.6 Key changes between the 2019 and 2020 plans are set out below:
- Reference added requiring that central to the required masterplan for the

¹ Systra (November 2020) Transport Locality Assessments. Introductory note and assessments – Salford Allocations

allocation shall be the consideration of opportunities to restore habitats, strengthen ecological networks, and manage the carbon and hydrological implications of development, having regard to the presence of peat

- New criterion added requiring that development is supported by a robust delivery strategy which is prepared in partnership with key stakeholders, which secures the effective delivery of the full masterplan, including transport, green and social infrastructure, affordable housing and planning obligation contributions
- New criterion requiring development to incorporate measures to mimic natural drainage through the use of green sustainable urban drainage to control the rate of surface water run-off
- New criterion requiring development to minimise impact on local highways and provide contributions to support the improvement of affected local junctions
- Added specific reference to development achieving a minimum 10% net gain in biodiversity
- Any planning applications for over 50 dwellings will need to be supported by a project specific Habitats Regulation Assessment
- Added in a requirement for a hydrological assessment to be undertaken in order to avoid any adverse impacts on the hydrology of Chat Moss
- Reference to tree planting forming part of appropriate mitigation to address issues of noise associated with the railway line and M62

4. Site Selection

- 4.1 The site selection process undertaken to determine the priority allocations to be taken forward through the GMSF is detailed in a separate background report published alongside the GMSF². Land at North of Irlam Station has been selected on the basis of criterion 1 (Land which has been previously developed and/or land which is well served by public transport) of the assessment criteria, given that the vast majority of the site would be within 800m of Irlam Station.

5. Planning History

- 5.1 Most proposals within the allocation boundary have been for replacement dwellings, removal of agricultural occupancy conditions and new agricultural buildings. Part of the site was included in a large development proposal for residential, sports and community facilities but which was refused on green belt grounds a number of years ago.

6. GMSF 2019 Consultation Responses

- 6.1 A significant number of respondents were opposed to the principle of releasing Green Belt for new housing, and that the changes to the Green Belt would result in

² GMCA (September 2020) GMSF Site Selection Background Paper

boundaries that not readily recognisable as required by the National Planning Policy Framework, and set a precedent for the release of additional Green Belt land on the mosslands. Moreover, it was identified that the site is Grade 1 agricultural land, provides a 'green lung', and is land that is well used for recreation. Objection was also raised to building on peat given it performs as a carbon sink, whilst it was noted that it may be very difficult to build on peat as a result of land instability (and that this this will have an impact on the viability of developing the site). As an alternative brownfield sites should be developed, whilst it was also highlighted that additional brownfield sites will become available over the course of the plan period that have not currently been identified.

- 6.2 A significant number of comments related to the exacerbation of existing issues of congestion / gridlock, particularly in peak times, and the fact that there is only 'one road in and one road out' of Irlam/Cadishead. The issue of traffic congestion is also exacerbated when there is an accident on the M62/M6, whilst account also needs to be had of the cumulative impact of other developments, such as Port Salford and housing development at Carrington, and events being held at the AJ Bell Stadium. Linked to this, it was commented that air pollution would be worse as a result of new development given the additional number of cars, whilst accessing any new development would be problematic given the nature and width of the roads that would be likely to provide access to the site.
- 6.3 It was noted by many that part of the rationale for the allocation appears to be its proximity to Irlam Train Station; however it was remarked that there is lack of car parking at the station, services are already poor / overcrowded, and the station is not accessible to all.
- 6.4 A large number of representations stated that biodiversity of the moss will be seriously impacted by development, with adverse impacts on priority species and habitats of importance at the national, GM and local level. A number of other negative impacts on the area were identified, including a lack of capacity in community infrastructure, the need to relocate existing businesses, a potential drop in property values, and increased crime.

7. GMSF Integrated Assessment

- 7.1 A summary of the integrated assessment³ conclusions relating to the allocation are provided in the table below. Other than in respect of impacts relating to the development of greenfield land in agricultural use, the impacts identified were largely positive. Possible actions in respect of mitigation identified are considered to have been adequately addressed through the GMSF Policy itself, thematic policies within

³ Arup (January 2019, and October 2020) Integrated Assessment of the Greater Manchester Spatial Framework

the GMSF and/or local policy proposed through the Publication Salford Development Management Policies and Designations Document (January 2020).

Objective	Summary of assessment and mitigation identified	Action on mitigation
1. Provide a sustainable supply of housing land including for an appropriate mix of sizes, types, tenures in locations to meet housing need, and to support economic growth	Very positive impacts relating to the allocation for housing and the requirements within the policy for a broad mix of housing and accommodation for older people. Positive impact relating to the integration of green infrastructure within the site. Neutral impact in relation to energy efficiency and resilience of housing stock.	No mitigation identified.
2 Provide a sustainable supply of employment land to ensure sustainable economic growth and job creation	Very positive impact identified in relation to the school provision. Neutral impacts identified. In relation to other criteria.	No mitigation identified
3. Ensure that there is sufficient coverage and capacity of transport and utilities to support growth and development	Very positive impacts in relation to the requirement for a high quality network of public routes through the site and connecting to Irlam Station. Uncertain impacts in relation to digital and utilities infrastructure. A feasibility study into requirements is recommended.	The recommended mitigation is addressed by GMSF thematic policies GM-E 1 and GM-N 2, and a masterplan for the site as required by the allocations policy would also address the issue.
4. Reduce levels of deprivation and disparity	Identified impacts as neutral as it was considered uncertain that development would affect deprived areas. Mitigation identified in respect of considering deprived areas in relation to benefits such as	The importance of social value as part of new development in the city is clearly set out in the Publication Salford Local Plan (January 2020) along with

Objective	Summary of assessment and mitigation identified	Action on mitigation
	creation of construction and operational employment, or improved transport links or increases in the range of community facilities.	associated policy requirements. It is also addressed by GMSF thematic policies GM-E 1, GM-E 4, GM-E 5 and GM-P 1.
5.Promote equality of opportunity and the elimination of discrimination	Identified a neutral impact in relation to this objective. As mitigation it was identified that the policy could reference integration with existing communities and also encourage the provision of varied tenures within the development.	In respect of the other issues raised the policy requirement for masterplanning to be developed with the local community and other stakeholders could be significant in this regard. Other issues of equality and opportunity area addressed in thematic policies of the GMSF and the Publication Salford Local Plan. In terms of the latter including policy requirements relating to fairness, equality of access and design.
6. Support improved health and wellbeing of the population and reduce health inequalities	A largely positive impact was identified citing policy requirements relating to green infrastructure, public routes through the site and improvements to Irlam Station.	No mitigation identified.
7. Ensure access to and provision of appropriate social infrastructure	A largely positive impact was identified citing school provision, play provision and allotment plots. Further mitigation was suggested to ensure any new provision was accessible to all and local capacity is	The allocation policy now includes reference to capacity of associated social and community uses. Publication Local Plan included additional requirements in relation

Objective	Summary of assessment and mitigation identified	Action on mitigation
	considered through masterplanning.	to health and education. The issues are also addressed in the GMSF thematic policies .
8. Support improved educational attainment and skill levels for all	Very positive impact in relation to school provision; neutral impact in relation to skills of working age population.	No mitigation identified.
9. Promote sustainable modes of transport	Very positive impacts due to the requirement for a high quality network of public routes through the site, connections to the station and requirement for improvements at the station.	No mitigation identified.
10. Improve air quality within Greater Manchester, particularly in the 10 Air Quality Management Areas (AQMAs)?	<p>A positive/negative impact is identified, the assessment referencing proximity to the AQMA and also that the policy supports the use of active and sustainable modes of travel.</p> <p>Seeking to minimise private car use and considering mitigation solutions including green infrastructure, incentivising electric car use and/or masterplan layout which reduces emissions near sensitive receptors are all identified as mitigation.</p>	The issues identified can be addressed through masterplanning. The issues are addressed within the thematic policies of the GMSF and the Publication Salford Local Plan. The Local Plan includes requirements relating to electric vehicle charging and the incorporation of green infrastructure within development.
11. Conserve and enhance biodiversity, green infrastructure and geodiversity assets	Positive and very positive impacts identified. The location adjacent to a wildlife corridor and a priority habitat is noted, as is a GMEU priority species record within the site. The requirements within the policy for high levels of green	The justification for the policy now includes reference to a minimum 10% net gain in biodiversity. Issues are also addressed within the thematic policies of

Objective	Summary of assessment and mitigation identified	Action on mitigation
	infrastructure, support for the Nature Improvement Area, avoiding adverse impacts on the hydrology of Chat Moss and other requirements are noted as reasons for the positive/very positive score.	the GMSF and Salford Local Plan.
12. Ensure communities, developments and infrastructure are resilient to the effects of expected climate change	A neutral impact was originally recorded which was amended to a positive score in 2020 following the inclusion of measures relating to sustainable drainage and the need for a hydrological assessment to avoid adverse effects on the hydrology of Chat Moss.	Climate change adaptation is addressed further within the thematic policies.
13. Reduce the risk of flooding to people and property	Impacts identified were largely neutral due to the allocation's location outside flood zones. Some impacts have been changed to positive in 2020 assessment, presumably due to the inclusion of a sustainable drainage requirement.	No mitigation identified
14. Protect and improve the quality and availability of water resources	Positive impact identified.	Allocation policy now includes requirement for sustainable drainage measures and hydrological assessment. Further mitigation is provided within thematic policy GM-S 5.
15. Increase energy efficiency, encourage low carbon generation	Neutral and positive impacts were recorded due to references within policy to active travel.	Issues are addressed in thematic policies in the GMSF and a number of policies within the Publication Salford Local Plan including in

Objective	Summary of assessment and mitigation identified	Action on mitigation
and reduce greenhouse gas emissions	<p>The assessment recommended making reference to energy efficiency directly and ways that it can be increased, such as highlighting the benefits of sustainable modes of transport.</p> <p>It also noted that the site is peat and therefore there are potential greenhouse gas impacts.</p>	<p>relation to climate change, design, access and energy.</p> <p>The allocation policy includes a criterion relating to minimising loss of carbon from the peat.</p>
16. Conserve and/or enhance landscape, townscape, heritage assets and their setting and the character of GM	<p>Positive impacts identified in relation to retention of landscape features and the requirement that vehicular access does not compromise the quality of existing residential areas.</p> <p>Neutral impact in relation to heritage assets as there are none on the site and the policy includes protection for nearby assets.</p> <p>Suggested mitigation is a landscape appraisal to be included as part of any planning application.</p>	Issues are addressed in thematic policies of the GMSF and Local Plan.
17. Ensure that land resources are allocated and used in an efficient and sustainable manner to meet the housing and employment	<p>Major negative impacts identified resulting from the development of greenfield land in agricultural use.</p> <p>Suggested mitigation was to consider how PDL development and the development of derelict land, properties and infrastructure</p>	Previously developed land (PDL) opportunities within the city are identified through Salford's Housing and Economic Land Availability Assessment (and brownfield register). No particular opportunities relating

Objective	Summary of assessment and mitigation identified	Action on mitigation
needs of GM, whilst reducing land contamination	could be encouraged as a result of development	<p>specifically to the site are apparent.</p> <p>Issues are addressed within the thematic policies of GMSF and Local Plan.</p>
18. Promote sustainable consumption of resources and support the implementation of the waste hierarchy	<p>A neutral impact is identified due to a lack of specific reference within the policy.</p> <p>Mitigation included the promotion of sustainable construction methods and giving consideration to waste and recycling facilities in design.</p>	<p>These issues are specifically addressed in the Publication Salford Local Plan including policy requirements relating to efficient and coordinated use of land, energy, design and waste.</p> <p>GMSF thematic policy GM-S 7 and the masterplan required by the allocations policy would further address the issues.</p>

Section B – Physical

8. Transport

- 8.1 The site allocation is well served in terms of public transport and has been identified as being appropriate for development due to its location next to Irlam rail station, with services that provide easy access to the huge range of employment and leisure opportunities in the City Centre and Trafford Park. Regular bus services pass the allocation on Liverpool Road between Irlam and the Regional Centre and Irlam station located immediately south of the allocation boundary. Public transport access would be further enhanced through improvements to bus service frequencies, the development of capacity improvements and the potential for tram train services on the CLC line.
- 8.2 There are numerous footpaths and residential streets in the surrounding area that provide access to amenities and shared off street and on street cycle lanes are also provided along the B5320 Liverpool Road. The area would also benefit from the introduction of the 'Bee network' which would provide improved provision for pedestrians and cyclists to access local amenities and employment areas, further reducing the dependency on private car use.
- 8.3 A Locality Assessment⁴ has been prepared for the site allocation in order to confirm the potential transport impacts and identify appropriate mitigation to support the inclusion of the allocation in the GMSF. The site has the potential to accommodate 1,100 - 1,400 dwellings and associated social and community uses. The assessment tested a development comprising 1,100 dwellings and therefore the acceptability of the final 300 homes would be contingent upon further work and potentially the need to deliver further improvements to the transport network than have been identified at this stage.
- 8.4 The assessment concludes that whilst some localised issues have been identified, these can be overcome through careful masterplanning and further, more detailed assessment. It should be noted that the Locality Assessment presents a 'worst case' scenario which does not take full account of the extensive opportunities for modal shift toward active travel and public transport improvements associated with the significant continued investment proposals within the Greater Manchester 2040 Transport Strategy. The site allocation policy requires that a masterplan and delivery strategy is prepared for this site and these documents would consider issues relating to transport. This would allow traffic conditions at each phase to be assessed to ensure that the network is capable of accommodating the traffic associated with the

⁴ Systra (November 2020) Transport Locality Assessments. Introductory note and assessments – Salford Allocations

development and would allow the phasing of development to be adjusted if necessary, to ensure that the impact on the network is minimised.

8.5 At this stage, the assessment identifies the following schemes as being necessary to bring the allocation forward. These are reflected in the site allocation policy requirements, namely criteria 6, 7 and 8:

- Improvement at B5320 Liverpool Road / B5471 Brinell Drive Junction;
- Improvement at A57 Cadishead Way / B5311 Fairhills Road Junction;
- Improvement at the B5320 Liverpool Road / Roscoe Road / B5311 Fairhills Road Junction;
- Walking & cycling improvements to/ from and within the allocation and provision of direct access to Irlam station;
- Increased provision of cycle parking at Irlam station

8.6 The assessment highlights some capacity issues at the A57 Liverpool Road/ Stadium Way Junction and Junction 11 of the M60, which are a consequence of the cumulative impacts with Port Salford Extension and would require further assessment and discussion with Highways England.

8.7 Roscoe Road and Astley Road provide potential suitable access points and both links already run directly through the proposed allocation and provide junctions with the B5320 Liverpool Road. New Moss Road provides a potential additional access point, however there are limitations to the volume of traffic that could use this access with a narrow bridge in place over the railway line. As a masterplan for the allocation is developed, further work would be required to assess their suitability. It is anticipated that restrictions would be placed on the number of homes for different land parcels to ensure that rat running through existing residential streets is minimised and traffic uses the most appropriate accesses.

9. Flood Risk and Drainage

9.1 The Strategic Flood Risk Assessment⁵ has identified that the site lies entirely within Flood Zone 1 and that development is appropriate from a flood risk perspective, subject to a site specific Flood Risk Assessment being undertaken at the planning application stage. Small areas of surface water flood risk are identified but these are not a concern and can be addressed as part of any planning application.

10. Ground Conditions

10.1. The site is known to be underlain by peat which presents engineering challenges for development due to compressibility of the material leading to differential settlement. Ground investigations were undertaken on the site on behalf of the city council in

⁵ JBA consulting (March 2019) Level 1 Strategic Flood Risk Assessment for Greater Manchester – Update

late 2019, with the purpose of this being to provide an outline indication of the peat depths on the site, identify any particularly problematic parts of the site and better understand the practical issues associated with its development. The ground investigations report⁶ and a summary of it⁷ have been published for information alongside the 2020 GMSF.

- 10.2. The ground investigations consisted of 20 boreholes logged to determine the nature and depth of various strata. Geotechnical testing was undertaken in each borehole consisting of standard penetration testing, sulphates, pH testing, particle size distribution and sedimentation. This is a standard screening suite of geotechnical tests used to determine the general bearing capacity of the soils. Some limited ground gas monitoring was also undertaken.
- 10.3. The borehole logs identified that peat depths within the proposed site allocation range from between 0.2m and 4.95m. Whilst the ground conditions are more onerous than a conventional development, the ground investigations have not revealed peat depths that would make development impossible. It is considered that the site has ground conditions that can be dealt with using techniques to stabilise the ground and a number of technologies exist (for example soil mixing) to develop land on the type of ground encountered during the site investigation. In some areas where the peat is particularly shallow, using conventional foundations extended to a slightly greater depth may also be appropriate.
- 10.4. With respect to increased build costs, whilst there would be costs associated with addressing the ground conditions which are additional to standard build costs, these are not considered to be prohibitive and the development remains viable. This is discussed in more detail in the viability section of this topic paper.
- 10.5. It is considered that the extent of the investigations to date have minimised the risk sufficiently to provide a reasonable indication of the ground conditions and confirm that the site can be allocated. Whilst there remains a possibility of localised risks, it is considered this could be dealt with at the detailed design stage. Further site investigation will be required at the detailed design stage (i.e. when a masterplan is produced/planning application prepared).
- 10.6. Much of the site is grade 1 agricultural land and some of the site is currently being farmed. Given the overall scale of development that needs to be accommodated across Greater Manchester up to 2037, the GMSF considers that a limited amount of development on high grade agricultural land is considered necessary and the benefits of delivering additional housing in this accessible location are considered to outweigh the loss of the land's farming potential.

⁶ Capita (July 2020) North of Irlam Station development – ground investigation report

⁷ Salford City Council (September 2020) Non-technical summary. GMSF allocation: land to the north of Irlam Station

11. Utilities

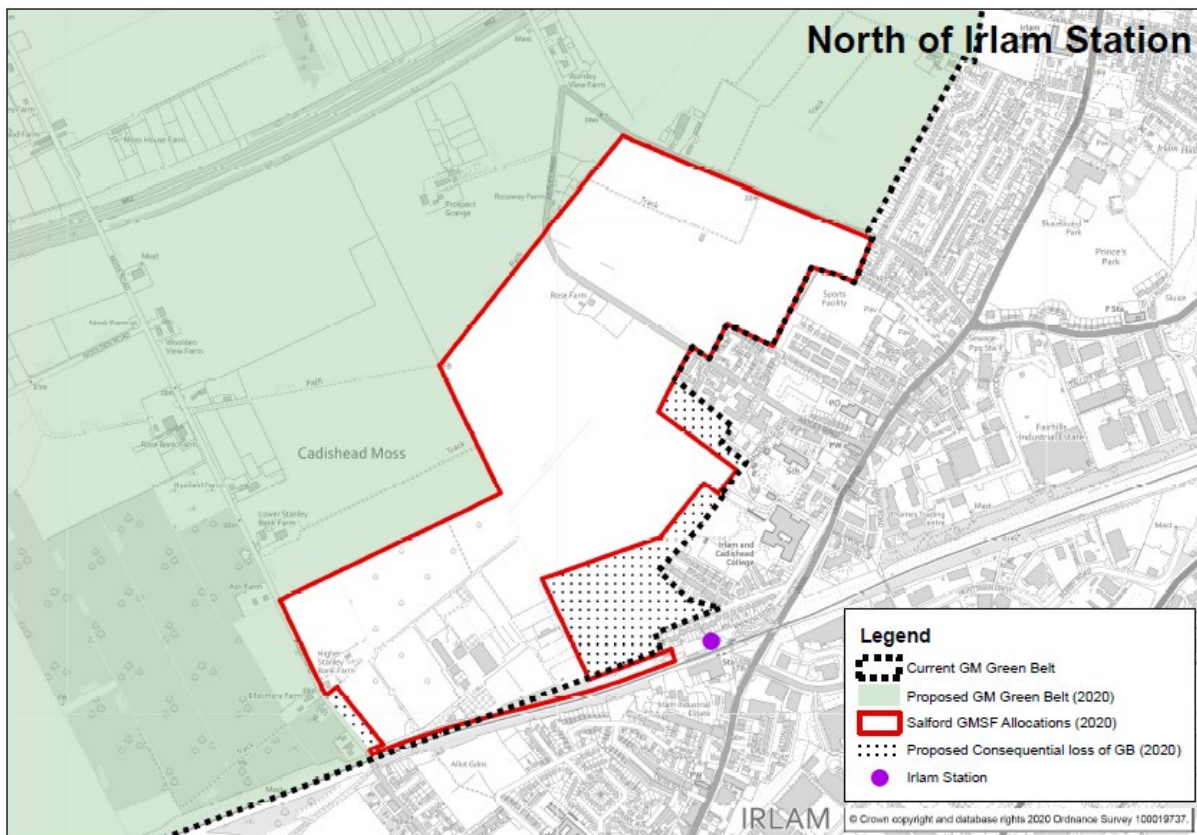
- 11.1 United Utilities has advised that there is a small distribution main running through the middle of the site along an existing road (Roscoe Road). A gravity sewer runs along a small section of the southern part of the site adjacent to the railway line, the easements required for access to this sewer are located outside of the site allocation boundary. Whilst these features would not constrain the site's development, they would need to be planned around and consideration should be given to establishing points of connection as early as possible between different parts of the development.
- 11.2 Cadent has confirmed that the site could connect to an existing gas main on Liverpool road. The demand is estimated to be 1450scm/h at peak or 15,708kwh (on the assumption that all homes connect to the gas network). Due to the size of this site, reinforcement may be required to ensure that there is enough pressure at the connection point. The need for this would be assessed in detail at the time the connection request is submitted to Cadent.
- 11.3 Electricity North West (ENWL) estimates that the electrical demand (i.e. the peak demands used to determine the size of the connections required for each development) associated with this site is 3.04MW. The demands associated with the city's baseline supply of housing and employment sites and the four GMSF allocations in Salford totals 243.3 MW. To inform their plans for the network, ENWL forecast how customers would use and generate electricity in their annual Distribution Future Electricity Scenarios (DFES) and information on developments are an important input to this. In assessing the overall impact of all development proposals in Salford up to 2037 on the network, ENWL makes assumptions about the average electrical demand of each type of development (each house would be heated by gas and half of the apartments would have electrical heating and the other half would have heat pumps which significantly increase the electrical requirements of the property. Assumptions are also made about the electrical consumption of the industrial and commercial spaces.). The assessment is therefore an approximation, recognising that customers would change their needs over the same timescale.
- 11.4 ENWL has indicated that there is approximately 54MW space capacity within Salford's 11 primary substations. ENWL concludes that by 2037, additional electrical demands would exceed spare capacity if all of the developments are realised such that their network. ENWL would therefore need to expand network, and although would first consider using the existing network more flexibly, the size of the estimated new capacity is likely to mean that new Primary substations would be needed. These are issues associated with accommodating the wider development requirements within Salford rather than being specific to this site. ENW has indicated that requirements would depend on the precise timing and extent of developments, interacting with the altered needs of other customers. Ongoing dialogue between the

city council and ENWL would therefore be important and the masterplanning process provides an opportunity to consider further any site-specific requirements.

Section C – Environmental

12. Green Belt Assessment

12.1 The allocation would result in the removal of 66.5 hectares of existing Green Belt. 58.8 hectares within the allocation itself and a further 7.7 hectares resulting from the removal of other land to the east of the allocation which would become detached from the wider Green Belt, and existing dwellings to the south of the allocation. This allows for a new Green Belt boundary to be drawn along Moss Road.



Exceptional Circumstances

12.2 The exceptional circumstances that have required the identification of site allocations within the Green Belt are set out in detail in a Background Report⁸ the key driver being the need to deliver the ambitions set out in the Greater Manchester Strategy and the objectively assessed need for both employment and housing.

⁸ GMCA (October 2020) Our Exceptional Circumstances

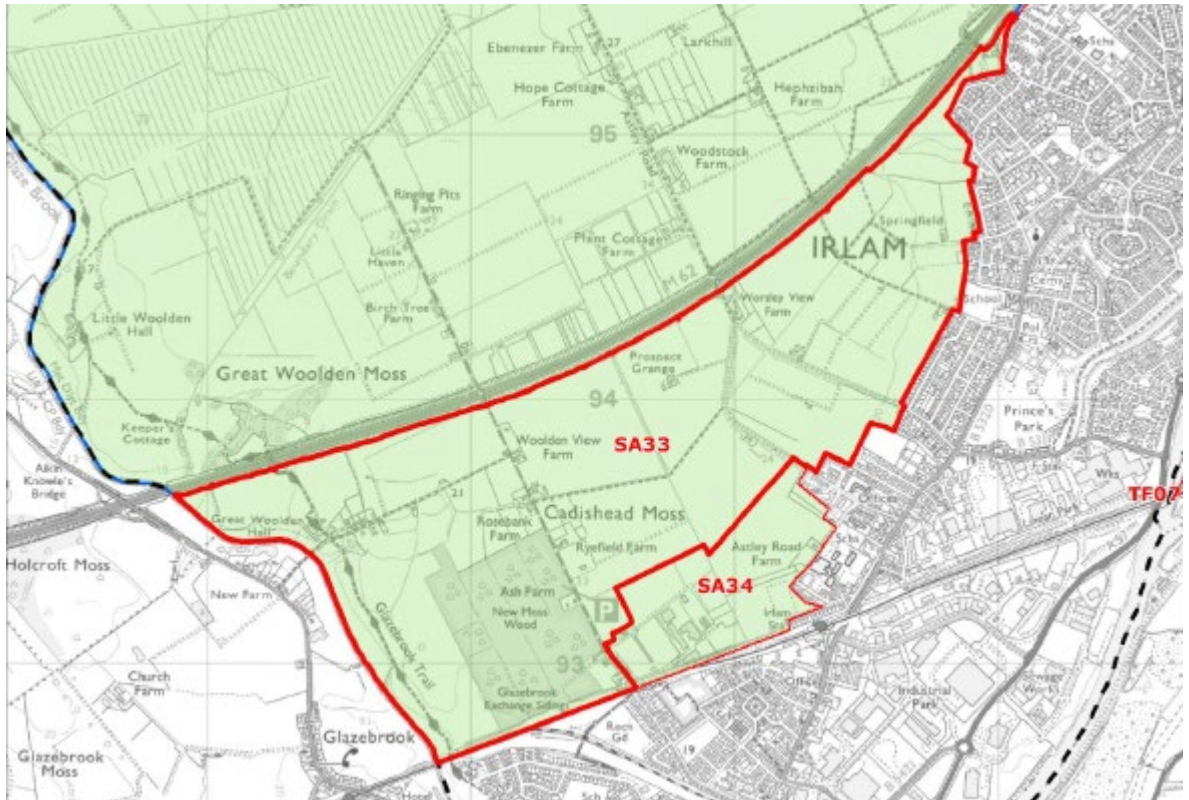
- 12.3 North of Irlam Station has been selected to deliver part of the identified dwelling requirement given its proximity to Irlam Station and the opportunity this provides to encourage the use of public transport⁹. This is consistent with paragraph 138 of the NPPF which states that “where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well-served by public transport.”
- 12.4 At the local level the site would contribute to a wider mix of dwellings coming forward in the city (particularly houses in Salford West) with the existing pipeline heavily weighted towards apartment development reflecting the city’s location at the heart of the GM conurbation and forming part of the City Centre. The allocation would also deliver a significant number of affordable dwellings, with the GMSF allocation policy requiring the provision of an affordable housing scheme equivalent to at least 25% of the 1,100 to 1,400 dwellings to be provided within the allocation.
- 12.5 The GMSF Allocation policy identifies a number of requirements for the development of the site, some of which have the potential to bring wider benefits. These are discussed in greater detail elsewhere in this topic paper but include the inclusion of accommodation specifically targeted at older people, a primary school if no capacity within existing schools exists at the time of development, the provision of a neighbourhood park and allotments, a 10% biodiversity net gain, and new pedestrian and cycle routes.

Contribution to Green Belt purposes

- 12.6 An assessment of the contribution that parts of the Greater Manchester Green Belt make to the Green Belt purposes defined in national policy was published in 2016¹⁰. The allocation was assessed as part of two separate parcels (SA33 and SA34) in that document, which also included adjoining land to the north, east and west.

⁹ GMCA (September 2020) GMSF Site Selection Background Paper – criterion 7

¹⁰ LUC (2016) Greater Manchester Green Belt Assessment



12.7 A summary of this assessment is shown in the table below:

GB Purpose	Parcel SA33		Parcel SA34	
	Assessment	Conclusion on contribution	Assessment	Conclusion on contribution
Purpose 1 - Check the unrestricted sprawl of large built up areas				
1a - Does the parcel exhibit evidence of existing urban sprawl and consequent loss of openness?	There is a strong sense of openness because limited urbanising features are set within a landscape of flat farmland, and nursery woodland. The parcel plays a strong role in	Strong	There is a sense of openness within the parcel because existing urbanising features are set within a landscape of farmland, tree lines and plant nursery vegetation, though this is	Moderate

	Parcel SA33		Parcel SA34	
GB Purpose	Assessment	Conclusion on contribution	Assessment	Conclusion on contribution
	checking the unrestricted sprawl of Irlam and Cadishead.		compromised in parts.	
1b - Does the parcel protect open land from the potential for urban sprawl to occur?	The parcel plays a strong role in inhibiting ribbon development along internal minor roads, from east to west these include Springfield Lane, Roscoe Road, Moss Road and Woollen Road.	Strong	The parcel plays a limited role in inhibiting ribbon development along Astley Road. Ribbon development has already occurred along Moss road.	Moderate
Purpose 2 – To prevent neighbouring towns merging into one another				
Does the parcel prevent the merging or erosion of the visual or physical gap between neighbouring settlements?	Adjacent to the settlements of Irlam and Cadishead which have already merged. The parcel plays a wider strategic role as part of the large expanse of Green Belt between Greater Manchester and Warrington.	Moderate	Adjacent to the settlements of Irlam and Cadishead which have already merged. The parcel plays a wider strategic role as part of the large expanse of Green Belt between Greater Manchester and Warrington.	Moderate
Purpose 3 – To assist in safeguarding the countryside from encroachment				
Does the parcel have the characteristics of countryside and/or connect to land with the characteristics of countryside?	The parcel displays characteristics of the countryside and is generally rural in character.	Moderate	There is a sense of urban encroachment within the parcel as a result of playing fields with areas of	Weak

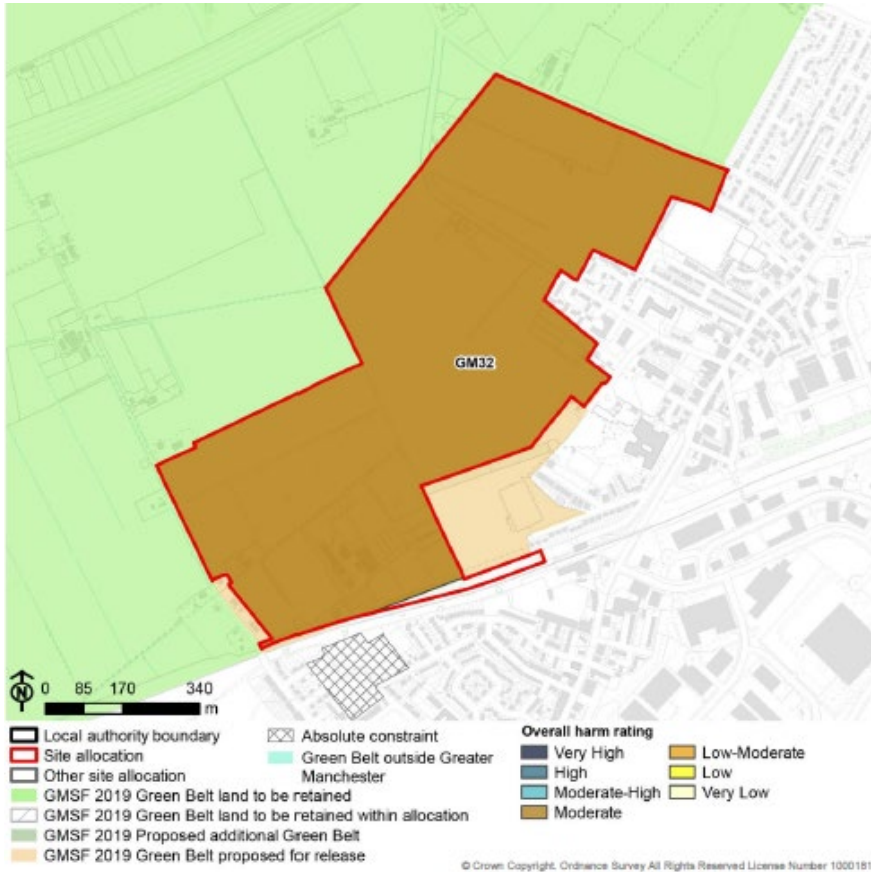
GB Purpose	Parcel SA33		Parcel SA34	
	Assessment	Conclusion on contribution	Assessment	Conclusion on contribution
Has the parcel already been affected by encroachment of urbanised built development?	Neighbouring urban development is clearly visible from large areas of the parcel, but does not significantly detract from its rural character.		hardstanding, a large scale plant nursery with associated buildings and a small number of houses. The parcel displays some of the characteristics of the countryside despite these urbanising influences but lacks a strong rural character.	
Purpose 4 - To preserve the setting and special character of historic towns				
Does the parcel contribute to the setting and 'special character' of a historic town(s)?	Limited visual or physical relationship with any historic settlements	No contribution	Limited visual or physical relationship with any historic settlements	No contribution
Purpose 5 - Assist in urban regeneration by encouraging the recycling of derelict and other urban land				
The assessment does not provide a parcel by parcel assessment in relation to this purpose given difficulties in distinguishing the extent to which individual parcels delivers against it.				

Potential Impact on the Green Belt

12.8 Further to the above, an assessment of the potential harm to the Green Belt arising from the allocation's release has been undertaken¹¹. This focuses on the allocation

¹¹ LUC (September 2020) Stage 2 Greater Manchester Green Belt Study, Assessment of Proposed 2019 GMSF Allocations

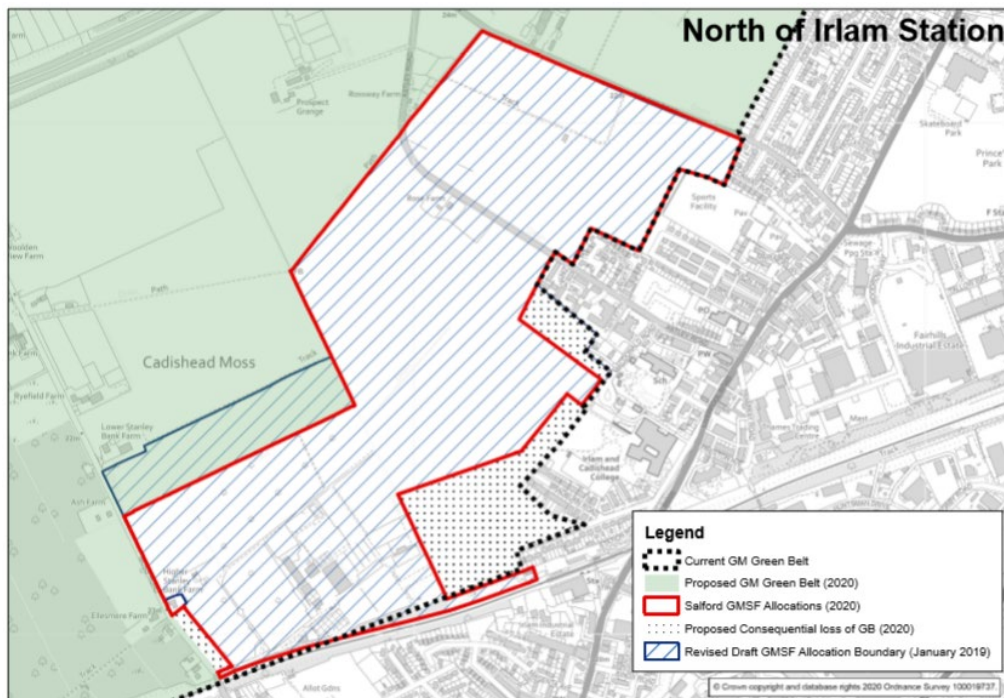
boundary as proposed in the Revised Draft published in 2019¹² and shown in the image below¹³.



12.9 It should be noted that the allocation boundary proposed in the latest version of the GMSF (2020) has been reduced in scale from that identified in 2019 (with land to the north western boundary excluded). Both versions of the allocation boundary are shown on the image below for comparison purposes

¹² GMCA (January 2019) Revised Draft Greater Manchester Spatial Framework

¹³ LUC (September 2020) Stage 2 Greater Manchester Green Belt Study, Assessment of Proposed 2019 GMSF Allocations, Appendix B, page 189



- 12.10 The area released from the Green Belt under the 2019 and 2020 versions of the GMSF, and the features used to define the new Green Belt boundary, are largely the same. The main difference being the exclusion of an area of land to the west of the allocation which it is now proposed would remain within the Green Belt.
- 12.11 Notwithstanding this reduction in scale, in both versions of the plan the new Green Belt boundary is defined by Moss Road to the west of the allocation, field boundaries to the north and Roscoe Road to the east. As such the conclusions reached in respect of the potential harm to the Green Belt of the 2019 version of the allocation are considered to remain applicable to the new boundary.
- 12.12 The potential harm to the Green Belt of the allocation’s release has been assessed as “moderate” due to the release constituting “relatively significant sprawl and encroachment onto the countryside but would constitute only a negligible impact on retained Green Belt land.”¹⁴
- 12.13 A more detailed summary of the allocation’s potential impact on Green Belt purposes and on adjacent Green Belt, as identified in the Greater Manchester Assessment of proposed allocations¹⁵, is provided in the table below.

¹⁴ LUC (September 2020) Stage 2 Greater Manchester Green Belt Study, Assessment of Proposed 2019 GMSF Allocations, page 191

¹⁵ LUC (September 2020) Stage 2 Greater Manchester Green Belt Study, Assessment of Proposed 2019 GMSF Allocations, Appendix B page 191

Impact on Green belt purposes:

Green Belt Purpose	Impact	Comments
Purpose 1 – Check the unrestricted sprawl of large built-up areas	Relatively significant	The release of the allocation would constitute sprawl. The Allocation is open, however the weak distinction with the urban edge limits to a degree its role in preventing sprawl.
Purpose 2 – Prevent neighbouring towns merging into one another	Limited/No	The nearest towns of Culcheth (Warrington) and Birchwood (Warrington) are too far from the Allocation to be considered 'neighbouring'.
Purpose 3 – Assist in safeguarding the countryside from encroachment	Relatively significant	The release would encroach on land which, despite a lack of distinction from the urban edge, is generally perceived as countryside and has a strong relationship with open land lying to the north.
Purpose 4 – Preserve the setting and special character of historic towns	Limited/No	Land does not make a significant contribution to the setting of any historic town.
Purpose 5 – To assist in urban regeneration by encouraging the recycling of derelict and other urban land	Equal contribution	All Green Belt land is considered to make an equal contribution to this purpose.

Impact on adjacent Green Belt:

Impact	Comments
No/negligible	Release of the Allocation would not increase the containment of any retained Green Belt land. The release would result in minimal change in strength to the Green Belt boundary, which would subsequently be defined by a combination of hedgerows and minor roads (although the woodland of New Moss Wood beyond Moss Road would add some distinction on one of the inset edges).

12.14 The cumulative impact of all changes to the Green Belt proposed through the GMSF has also been assessed¹⁶. The assessment does not highlight any wider strategic implications for the Green Belt as a result of the allocation's release.¹⁷

¹⁶ LUC (September 2020) Stage 2 Greater Manchester Green Belt Study, Cumulative Assessment of Proposed 2020 GMSF Allocations and Additions

¹⁷ LUC (September 2020) Stage 2 Greater Manchester Green Belt Study, Cumulative Assessment of Proposed 2020 GMSF Allocations and Additions – Strategic Area 7, pages 22 and 23.

Mitigation to address Green Belt harm

- 12.15 The principal cause of harm to the Green Belt is from the loss of Green Belt land within the Allocation itself and therefore “mitigation measures would not reduce the harm of release of this Allocation”. It is nevertheless identified that “strengthening the boundary between the Allocation and surrounding retained Green Belt land could potentially increase the future distinction between inset land and retained Green Belt land”¹⁸ It is considered that this issue can be addressed through the masterplanning process required by criterion 1 of the GMSF allocation policy and any subsequent planning application.
- 12.16 NPPF paragraph 138 of the NPPF states that, when drawing up or reviewing Green Belt boundaries, strategic policy making authorities should “set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land”. To this end an assessment of the potential to enhance the beneficial use of the Green Belt around GMSF allocations has been undertaken¹⁹.
- 12.17 The assessment identifies a number of potential projects as listed below²⁰:

¹⁸ LUC (September 2020) Stage 2 Greater Manchester Green Belt Study, Assessment of Proposed 2019 GMSF Allocations, Appendix B page 189

¹⁹ LUC (September 2020) Stage 2 Greater Manchester Green Belt Study: Identification of Opportunities to Enhance the Beneficial Use of the Green Belt in the vicinity of Proposed 2019 Green Belt Allocations

²⁰ LUC (September 2020) Stage 2 Greater Manchester Green Belt Study: Identification of Opportunities to Enhance the Beneficial Use of the Green Belt in the vicinity of Proposed 2019 Green Belt Allocations, Appendix F

Potential enhancement projects	
Access	
1.	Public Right of Way access improvements including a review of signage, overgrown vegetation management and improve access provision (refurbishment of stiles and kissing gates).
2.	Consider upgrades to the Salford Trail and the Glaze Brook Trail.
Sport and recreation	
3.	Potential creation of accessible semi-natural greenspaces with opportunities for natural play.
4.	Consider the creation of new allotment facilities.
Biodiversity and wildlife corridors	
5.	Creation / enhancement of mossland habitats and establishment of peatland restoration schemes.
Landscape and visual	
6.	Potential ditch restoration works within Mosslands and Lowlands Farmlands LCT.
7.	Restoration of natural river course attributed to the Glaze Brook.
8.	Potential species rich hedgerow restoration within Mosslands and Lowlands Farmlands LCT.
9.	Green corridor enhancements along the M62.
10.	Removal of hedgerows within GM Allocation 32 should be performed sensibly, retaining as much of the original hedgerow as possible. Where hedgerow is lost it should be replaced in the surrounding Green Belt using a diverse range of native species.

12.18 Opportunities in this regard can be considered further through the masterplanning process required by the GMSF Allocation policy (criterion 1). However, relevant to the above, the allocation policy includes the following key requirements:

- Criterion 6 - Incorporate a high quality network of public routes through the site, connected into the wider pedestrian and cycling network that provides access to local facilities, public transport services, New Moss Wood and Chat Moss
- Criterion 8 - Include a new direct pedestrian and cycle route to Irlam Station from the west and enhance cycle parking and car parking facilities at the station
- Criterion 10 - Integrate high levels of green infrastructure throughout the site, including retaining landscape features such as mature trees and hedgerows, so as to minimise the visual impact on the wider landscape, achieve a minimum 10% net gain in biodiversity, mitigate the environmental impacts of development and provide an attractive backdrop to walking and cycling routes
- Criterion 11 - Support the objectives for the Great Manchester Wetlands Nature Improvement Area and avoid harm to protected species
- Criterion 12 - Be supported by breeding and winter bird surveys to understand and minimise any adverse impact on bird species in this area. Surveys of potential compensation areas should also be undertaken to demonstrate that displacement into the wider landscape is

- possible
- Criterion 13 - Be supported by a project specific Habitats Regulation Assessment for any planning applications involving 50 or more dwellings
 - Criterion 14 - Minimise the loss of the carbon storage function of the peat and undertake a hydrological assessment in order to avoid any adverse impacts on the hydrology of Chat Moss, whilst ensuring that there is no potential for future problems of land stability or subsidence
 - Criterion 15 - Incorporate measures to mimic natural drainage through the use of green sustainable urban drainage to control the rate of surface water run-off
 - Criterion 17 - Include a new neighbourhood park incorporating equipped areas for play
 - Criterion 18 - Include new allotment plots to meet the local standard

Summary

12.19 Exceptional circumstances have been identified to justify the allocation of Green Belt land for development; a “moderate” level of harm to the Green Belt has been identified as resulting from the site’s release, with “no/negligible” harm to adjacent Green Belt. The North of Irlam Station allocation would contribute both to GM wide dwelling requirements and has been selected on the basis of its proximity to Irlam Station and the opportunity this provides in terms of encouraging the use of public transport. At the local level the development of the site would contribute to the mix of dwellings within the city and would deliver a significant number of affordable dwellings.

13. Green Infrastructure

13.1 Almost the entire site has been identified as part of Greater Manchester’s priority green infrastructure, following analysis of a number of different datasets, including species records²¹. This does not preclude development, but it does highlight the importance of high levels of green infrastructure provision within the development, as required by criterion 10 of the allocation policy.

13.2 There is a public right of way (a bridleway) along Moss Road on the western boundary of the site, and a further right of way (footpath) along part of the north-western boundary of the site. Roscoe Road and Astley Road, although not definitive rights of way, are also used informally for recreation and access onto Chat Moss.

13.3 Significant numbers of responses have been received to the consultation at different stages of the plan preparation. Most recently, comments to the Revised Draft GMSF

²¹ GMCA (May 2018) GMSF Background Paper: The Natural Environment – Priority Green and Blue Infrastructure

(2019) stated that the site is currently well used for recreation and functions as a “green lung” for Irlam and Cadishead, with positive impacts on both physical and mental health. It is clear from the responses that local residents place a high value on the Chat Moss area and the opportunities for informal recreation it provides.

- 13.4 It is therefore imperative that any development on this site incorporates high levels of green infrastructure and attractive walking and cycling routes through it in order to provide opportunities for recreation and continued access to New Moss Wood, Chat Moss and the countryside beyond. There are a number of criteria proposed within the policy to ensure appropriate green infrastructure provision and mitigate impacts of development. These include: a high quality network of public routes through the site; and high levels of green infrastructure throughout the site, including retaining landscape features such as mature trees and hedgerows. In addition, Policy GI2 Chat Moss of the Salford Local Plan: Development Management Policies and Designations sets out the priorities for the Chat Moss area in some detail and any development on this site would need to have regard to that policy (as set out in paragraph 22.9 of the Local Plan).
- 13.5 A number of potential enhancements to green infrastructure on the site and in surrounding areas are suggested in the Green Belt Opportunities work²². These opportunities and the potential deliverability of them would be considered through the masterplanning and planning application stages.
- 13.6 A number of concerns have been raised during previous consultations regarding the peat soils on the site. Recent surveys commissioned by Salford City Council²³ found that peat depths varied between 0.70 metres and 4.45 metres below ground on the site, with peat depths increasing from the southwest to the northeast of the site. Peat levels are generally lowest in the southern parts of the site.
- 13.7 Construction methods identified in the ground conditions report²⁴ do not propose to remove peat but use ground stabilisation techniques such as soil mixing. Further work will be undertaken to investigate in broad terms the carbon implications of construction using the ground improvement methods identified in the ground conditions survey. It is a requirement of the allocation policy that development must minimise the loss of the carbon storage function of the peat and avoid any adverse impacts on the hydrology of Chat Moss. In addition, a masterplan needs to be prepared for the site; central to the masterplan shall be the consideration of opportunities to restore habitats, strengthen ecological networks, and manage the

²² LUC (September 2020) Stage 2 Greater Manchester Green Belt Study: Identification of Opportunities to Enhance the Beneficial Use of the Green Belt in the vicinity of Proposed 2019 Green Belt Allocations, Appendix F

²³ Capita (July 2020) North of Irlam Station Development: Ground Investigation Report. See also: Salford City Council (9 Sept 2020) Non-Technical Summary: GMSF Allocation: Land North of Irlam Station

²⁴ Capita (July 2020) North of Irlam Station Development: Ground Investigation Report

carbon and hydrological implications of development, having regard to the presence of peat.

14. Recreation

- 14.1 The allocation policy requires that the site provides a new neighbourhood park to include equipped areas of play for both younger and older children. The allocation area does not currently include formal recreation facilities therefore the new neighbourhood park is required to ensure that recreation facilities are accessible to new residents, which would also be of benefit to the wider community. The allocation policy also requires that the site includes new allotment plots to meet the local standard unless suitable alternative provision can be made in the local area.
- 14.2 The site would be required to contribute to the achievement of Salford City Council's recreation standards in accordance with the Salford Greenspace Strategy (2019) and the relevant existing policies in the Salford Unitary Development Plan (2009). New recreation standards are proposed in the Salford Local Plan: Development Management Policies and Designations which was published in January 2020 and is due to be adopted in 2021.

15. Landscape

- 15.1 The Greater Manchester Landscape Character and Sensitivity Assessment 2018²⁵ identified the site to fall within the landscape character "Mosslands and lowland farmland". This assessment was informed by the Landscape Character Assessment published by Salford City Council in 2007²⁶, for those sites within Salford. This identified the area as "Rural Mosslands; sub area 2 Southern Chat Moss". Features of the Southern Chat Moss site (and that are applicable to this site) are identified in this 2007 assessment as: a large scale landscape with open views giving a sense of rural remoteness in striking contrast with adjoining urban areas; a lack of built development apart from the grouped farm dwellings and buildings along the main private roads and the line of pylons; long private roads and rough tracks laid out as a rectilinear network alongside some deep drainage ditches; the M62 which runs mainly in a shallow cutting has little visual but significant noise impact on the rural atmosphere; and small isolated blocks of unmanaged woodland stand isolated in extensive arable fields.
- 15.2 As part of the 2018 Landscape Character and Sensitivity Assessment a number of potential mitigation measures and opportunities to consider for any new development were identified. These included opportunities broadly relating to: the retention of the rural character of the area; the retention and conservation of existing

²⁵ LUC (August 2018) Greater Manchester Landscape Character and Sensitivity Assessment

²⁶ Salford City Council (September 2007) Landscape Character Assessment

woodlands and hedgerows including additional planting; conservation and management of the mosslands; the designing-in of sustainable urban drainage systems and addressing any changes to hydrology; the conservation of the historic qualities of heritage assets; and the improvement of public access and provision of informal recreation provision. The site allocation policy now reflects these identified mitigation measures and opportunities.

16. Ecological/Biodiversity Assessment

- 16.1 The site is located on the edge of Chat Moss. It is within the Great Manchester Wetlands Nature Improvement Area and also within the Carbon Landscape HLF Landscape Partnership area. Almost the entire site has been identified as part of Greater Manchester's priority green infrastructure²⁷. It is an area that is recognised as supporting a range of biodiversity both in its own right and as part of a wider wetland area. The allocation policy requires development to support the objectives of the nature improvement area and Salford Local Plan policy BG1 Nature Improvement Areas would also apply to this site.
- 16.2 The justification for this allocation notes that the priority for any off-site nature conservation enhancements required to deliver a minimum 10% net gain in biodiversity is likely to be the restoration of lowland raised bog and complementary habitats in Chat Moss to the north. Issues relating to the peat on this site are covered in more detail in the "Ground Conditions" and "Green Infrastructure" sections above.
- 16.3 A walkover survey by Greater Manchester Ecology Unit (GMEU) in 2017²⁸ suggested little in the way of priority habitats. This supports the findings of the earlier Salford habitat survey.²⁹ There is a strip of neutral grassland in the centre of the site which may be a priority habitat (subject to further survey). There are some small areas of broadleaved woodland and several hedgerows, both of which may be priority habitats and the loss of these should be avoided if possible. The allocation policy requires high levels of green infrastructure throughout the site, including retention of landscape features such as mature trees and hedgerows.
- 16.4 The wider Chat Moss area, including these fields, is important for farmland birds and other wildlife. GMEU have previously advised that the farmland birds are generally vulnerable to disturbance and rely on open sight lines. Therefore, GMEU has advised that it would be preferable to reduce the area allocated for development, rather than proceed with a large allocation where built development was interspersed with significant areas of green infrastructure. The revised allocation is therefore significantly smaller in area than the original 2016 proposal. In addition, a requirement has been added to the policy on GMEU's recommendation such that

²⁷ GMSF (May 2018) The Natural Environment: Priority Green and Blue Infrastructure

²⁸ GMEU (January 2018 – revision 1) Ecological Appraisal: Cadishead Moss.

²⁹ Penny Anderson Associates (2008) Salford Extended Phase 1 Habitat Survey

development must be supported by breeding and winter bird surveys to understand and minimise impacts on bird species, including consideration of potential compensation areas and the wider landscape.

- 16.5 Issues relating to European designated sites in the vicinity are covered in the Habitats Regulation Assessment section below.

17. Habitat Regulation Assessment

- 17.1 The 2020 Habitats Regulations Assessment³⁰ 'screened in' this allocation for further assessment, stating that it is within 3km of the Manchester Mosses Special Area of Conservation (SAC), with potential cumulative air pollution effects and recreational impacts.
- 17.2 The more detailed assessment (the Appropriate Assessment) concluded that there was a need for project-level analysis of potential air quality impacts (and if necessary, project-level mitigation) on this site, as it represents a potentially significant source of additional traffic past the Manchester Mosses SAC on the M62. Wording to this effect has been inserted into the allocation policy, with a bullet point requiring any planning applications involving 50 or more dwellings to be supported by a project specific Habitats Regulations Assessment.
- 17.3 The Appropriate Assessment of recreational impacts notes that there is limited public access to the sites which make up the Manchester Mosses SAC and quotes Natural England as saying that they are not concerned about an increase of recreational pressure on these sites due to a lack of public access.

18. Heritage Impact Assessment

- 18.1 A screening exercise was undertaken by Salford City Council and GMAAS in September 2017³¹ based on the original 2016 proposed site boundary (which included land to the west extending as far as Great Woolden Hall and the Promontory Fort) and the site was screened in requiring further detailed assessment in terms of both the built heritage and the below ground remains. The site boundary has subsequently been amended and significantly reduced in size, removing the western area of the site closest to Great Woolden Hall and the Promontory Fort as well as some of the land to the north.
- 18.2 There are no designated or non - designated heritage assets within the 2020 site boundary but there are three non-designated assets located within the vicinity of the site, the closest being within 180m from the site boundary. Given that any

³⁰ GMEU (October 2020) Habitats Regulations Assessment of the Greater Manchester Spatial Framework

³¹ This screening exercise was published in the following document: Salford City Council (February 2019) Heritage Assessment of site allocations

development is likely to be low rise in scale as well as the separation distances involved it was not considered that there would be any impact upon the setting and significance of any of these assets located outside the boundary.

- 18.3 With regards to the below ground remains, the assessment³² concluded that the potential for archaeological remains to survive on the fringes of the mosses merited further investigation. This could be achieved via a programme of trial trenching which should be undertaken prior to the submission of any future planning application. For immediate purposes it was considered appropriate to reference the archaeological potential of the site in any policy documentation to enable a developer's brief to be drawn up in advance of development.

19. Air Quality

- 19.1 It is recognised that there are some existing air pollution challenges in Salford and Greater Manchester more widely, primarily associated with road transport and the Greater Manchester local authorities are working jointly to tackle these issues.
- 19.2 In Salford, the current Air Quality Management Area (AQMA) was defined in 2016 and was declared for potential exceedances of the annual mean Nitrogen Dioxide (NO₂) air quality objective. The site allocation is located to the south of part of the defined AQMA, which extends along the M62 motorway. To the south of the site allocation, parts of the B5320 Liverpool Road are also located within the AQMA.
- 19.3 A Greater Manchester Spatial Framework: Strategic Modelling Technical Note has been published alongside the GMSF. This provides an estimate for each modelled scenario (2025 and 2040) regarding air quality impacts derived from a combination of cumulative vehicle mileage change and national fleet change assumptions. There is a forecast reduction in both carbon dioxide (CO₂) and nitrogen oxides (NOX) emissions, although this is not appropriate for identifying specific air quality changes at an individual highway level.
- 19.4 Greater Manchester released a Clean Air Plan³³ for consultation in October 2020. The 10 Greater Manchester local authorities have worked together to consider a range of interventions and research has determined that the most appropriate approach is to implement a Clean Air Zone (CAZ) across the whole of Greater Manchester, with supporting measures to help owners upgrade to less polluting vehicles. The implications of a proposed GM-wide CAZ would lead to significant vehicle fleet improvements and associated air quality improvements in advance of the GMSF modelling scenario years of 2025 and 2040. While this plan is focussed on reducing Nitrogen Dioxide (NO₂) emissions, the proposals may also impact

³² GMAAS (November 2018) Greater Manchester Spatial Framework and Salford Local Plan. Archaeological Assessment: H3/4 Western Cadishead and Irlam

³³ <https://cleanairgm.com/>

Carbon Dioxide emissions (CO₂) due to fleet changes. The outcome of the Greater Manchester Clean Air Plan is that roadside Nitrogen Dioxide (NO₂) levels, in Greater Manchester, would be below the legal limit by 2024. The Strategic Road Network, including motorways and some major roads, is not included in the CAZ as these are under the control of Highways England.

- 19.5 Various policies within Greater Manchester's Transport Strategy 2040, and the GMSF itself, are also aimed at reducing emissions and improving air quality across the sub-region.
- 19.6 The Publication Salford Local Plan: Development Management Policies and Designations (January 2020), requires that development in Salford shall be consistent with achieving a substantial improvement in Salford's air quality and meeting statutory air quality targets. The development of this site allocation would need to comply with this policy once the plan is adopted and an air quality impact assessment would be required at the planning application stage.
- 19.7 The site benefits from its location adjacent to Irlam railway station with the potential to maximise trips by sustainable modes of travel. In this regard, the GMSF site allocation policy includes a requirement for the site to accommodate pedestrian and cycle routes to connect the existing cycle and walking network, local services and public transport facilities. It also requires the provision of a new pedestrian and cycle route to the station and enhance cycle and car parking at the station. Encouraging a shift to the use of more sustainable modes of travel would assist in reducing emissions, alongside other measures as part of a coordinated effort.

20. Noise

- 20.1 The M62 motorway is located to the north of the site, such that the site is subject to some traffic noise. A noise impact assessment would be required at the planning application stage. Appropriate mitigation would be necessary to address issues of noise, as required by the GMSF site allocation policy.

Section D – Social

21. Education

- 21.1 Criterion 16 of the allocation policy requires that land is set aside to accommodate additional primary school provision, unless it can be demonstrated that sufficient additional school places will be provided off-site within the local area to meet the likely demand generated by the new housing.
- 21.2 The site is allocated for up to 1,400 dwellings (should transport evidence demonstrate the acceptability of this), which the council has indicatively assumed would be 1,100 houses and 300 apartments. Primary pupil yields (i.e. the number of pupils you would normally expect from each house built) are set out within the council's adopted Planning Obligations Supplementary Planning Document (as refreshed in December 2019)³⁴. The yields are based on an analysis of housing developments that have been completed in the city over recent times³⁵. Using a number of assumptions around the size of dwellings that would be built as part of the development, it is estimated that the development would generate a need for primary school provision to accommodate around 280 pupils.
- 21.3 Given the above it has been assumed that the site would accommodate a two-form entry primary school (although in practice this could be provided off-site if it was demonstrated that sufficient additional school places were available within the local area). The city council will work with the landowners / developers to secure an appropriate solution for primary school provision at the time the development comes forward, having regard to actual and forecast capacity, pupil yields from housing developments and the cost of making provision for primary school places. This is in line with criterion 2 of the allocation policy, which requires that development of the site needs to be supported by a robust delivery strategy to secure the effective delivery of, amongst other things, social infrastructure (such as a school).
- 21.4 An on-site two form entry school has been assumed for the purposes of the financial viability work for the site that has been undertaken by Three Dragons.

22. Health Impact Assessment

- 22.1 There is no site-specific health provision identified as being required as a result of the proposed development. A masterplan / framework will need to be prepared for the site which will set out in more detail the precise mix of dwellings in terms of size and type. Indicatively however the city council has assumed that that site will be

³⁴ Salford City Council (December 2019) Planning Obligations Supplementary Planning Document: refreshed 9 December 2019

³⁵ Salford City Council (June 2015) Planning Obligations Supplementary Planning Document: background document on primary pupil yield methodology and evidence base

developed for up to 1,400 dwellings, comprised of 1,100 houses and 300 apartments. The delivery of 1,400 dwellings could accommodate around an estimated 3,500 additional residents, based on the average household size in Salford at the 2011 Census. Based on the national benchmark of 1,800 patients per GP and 1,400 per dentist the site might generate demand equivalent to approximately two full time GPs and two and a half dental practitioners.

- 22.2 The identification of the specific needs of the city's growing population and the best way to serve them is a continually evolving process which is being considered by Salford Together through updates to their Strategic Estates Strategy and Locality Plan. This work would inform the production of the required masterplan / framework that is to be developed in consultation with the local community, as required by criterion 1 of the policy.
- 22.3 Policy HH2 of the Salford Publication Local Plan: Development Management Policies and Designations (January 2020) requires that sites subject to masterplanning requirements (which includes all GMSF allocations in Salford) would need to ensure that appropriate provision is made for primary health care facilities. The developer should engage with the Clinical Commissioning Group at the earliest opportunity in order to determine health care requirements associated with the development. Where satisfactory provision cannot otherwise be made in the local area, individual developments that would generate additional demand for primary health care would be required to incorporate primary health care facilities.

Section E – Deliverability

23. Viability

- 23.1. Three Dragons has assessed the financial viability of all of the GMSF allocations on behalf of the GMCA and districts³⁶. The proposed development of 1,100 dwellings (comprised indicatively of 900 houses and 200 apartments) on the North of Irlam Station site has been assessed as being viable, with this taking into account local transport mitigation measures and the requirements of the allocation policy, including the provision of a two form entry primary school on the site and also 25% of the total dwellings being affordable housing (with the affordable housing comprised of 37.5% social rented, 37.5% affordable rented and 25% shared ownership). Full regard has also been had of the costs associated with the ground conditions on the site (i.e. building on peat); such costs are estimated at being nearly £24m over and above normal build costs if 1,100 dwellings and a two form-entry primary school were built on the site³⁷.
- 23.2. A sensitivity test has been prepared which considers whether a scheme of 1,400 dwellings (indicatively comprised of 1,100 houses and 300 apartments), as permitted by the policy subject to certain conditions being met, would also be viable. This shows that 1,400 dwellings would be viable with a 25% affordable housing requirement, a two-form entry primary school, and an additional build cost approaching £30m due to the ground conditions.
- 23.3. Full details of the methodology used by Three Dragons and also the base assumptions and testing summary are set out within the Stage 2 allocations viability report that has been published as part of the evidence base for the 2020 GMSF.

24. Phasing

- 24.1 The detailed phasing of development on the site will respond to, and form part of, the masterplan / framework or Supplementary Planning Document (SPD) that has to be developed in consultation with the local community and other stakeholders, and be considered acceptable by the city council (in line with criterion 1 of the allocation policy).
- 24.2 As the site is in multiple ownerships there is a requirement for a robust delivery strategy, which secures the effective delivery of the full masterplan, including transport, green and social infrastructure, affordable housing and planning obligation

³⁶ Three Dragons et al (October 2020) Greater Manchester Spatial Framework. Stage 2 Allocated sites viability report

³⁷ Salford City Council (October 2020) Proposed North of Irlam Station allocation: build costs associated with ground conditions

contributions (criterion 2). The requirement for an acceptable masterplan and a delivery strategy would influence when a start on site is most likely.

- 24.3 Having regard to the above, it has been indicatively assumed by the city council that the first completions on the site would be in 2026/27 with development of 1,100 homes (900 houses and 200 apartments) taking around 9 years to build out. Should it be demonstrated that 1,400 homes (1,100 houses and 300 apartments) would be acceptable, it is likely that the site would be fully complete within the plan period (i.e. by 2037). It has been assumed that there would be two developers of the site given its size, and multiple landowners.

25. Indicative Masterplanning

- 25.1 Criterion 1 of the allocation policy requires that development of the site will:

“Be in accordance with a masterplan/framework or Supplementary Planning Document (SPD) that has been developed in consultation with the local community and other stakeholders, and is considered acceptable by the city council, or in the case of an SPD adopted by the city council;”

- 25.2 It is clear therefore that any masterplan of this site will have to have been developed with the local community and other stakeholders. The layout of the development will need to respond to the requirements of the allocation policy, including:

- Provision of a robust delivery strategy, which secures the effective delivery of the full masterplan, including transport, green and social infrastructure, affordable housing and planning obligation contributions (criterion 2)
- Providing a broad mix of housing with densities increasing towards the most accessible parts of the site around Irlam Station, and include accommodation specifically targeted at older people (criterion 3)
- Incorporating a high quality network of public routes through the site, connected into the wider pedestrian and cycling network that provides access to local facilities, public transport services, New Moss Wood and Chat Moss (criterion 6)
- Including a new direct pedestrian and cycle route to Irlam Station from the west and enhancing cycle parking and car parking facilities at the station (criterion 8)
- Integrating high levels of green infrastructure throughout the site, including retaining landscape features such as mature trees and hedgerows (criterion 10)
- Protecting the quality of watercourses through and around the site (criterion 16)
- Including a new neighbourhood park incorporating equipped areas for play (criterion 17)
- Including new allotment plots to meet the local standard (criterion 18)

- Incorporating appropriate mitigation including tree planting to address issues of noise generated by the M62 motorway and the rail line (criterion 19);
- Setting aside land to provide additional school provision, unless it can be demonstrated that sufficient additional school places will be provided off-site (criterion 20)

25.3 At this stage an indicative layout / masterplan plan has not been prepared for the site. However, broad assumptions were provided to Three Dragons to enable work on the financial viability of the site to be completed. This assumed that apartments would be closest to the areas around Irlam Station at a net density of around 70 dwellings per hectare (at a maximum of 4 storeys in height), with houses being provided on the site at a net density of 35 dwellings per hectare. A two form entry primary school would take up around 2 hectares of land. Given the above assumptions and a total site area of nearly 59 hectares, around 57% of the site would accommodate built development if 1,100 dwellings were built. The remaining land would provide land for other policy requirements, such as open space, allotments and a neighbourhood park, as identified above. Should 1,400 dwellings come forward, then around 71% of the site would be for built development.

Section F – Conclusion

26. The Integrated Assessment

26.1 A summary of the integrated assessment³⁸ conclusions relating to the allocation are provided in the table below. Other than in respect of impacts relating to the development of greenfield land in agricultural use, the impacts identified were largely positive. Possible actions in respect of mitigation identified are considered to have been adequately addressed through the GMSF Policy itself, thematic policies within the GMSF and/or local policy proposed through the Publication Salford Development Management Policies and Designations Document (January 2020).

27. The main changes to the Proposed Allocation

27.1 The site allocation area has reduced from 65 hectares in the Revised Draft GMSF to 58.8 hectares in 2020 GMSF, having regard to further discussions with landowners the need to ensure that the site allocation is deliverable. The main boundary changes comprise the removal of a parcel of land on the western side of the site allocation.

27.2 The development yield has been reduced from 1,600 dwellings to 1,100 to 1,400 dwellings taking into account the reduced site allocation area, conclusions drawn in the locality assessment³⁹, and the concerns expressed in the representations to the 2019 GMSF regarding the overall scale of development and the ability of infrastructure to accommodate this. Although the site could accommodate 1,400 new homes, work undertaken to date has only confirmed that the local highway network has capacity to accommodate 1,100. The site allocation policy explains that the acceptability of the final 300 potential homes is contingent upon further work and potentially enhancements to the wider transport network, which create additional capacity to accommodate this volume of further development.

27.3 Various changes to the wording of the site allocation policy are proposed in the 2020 GMSF, which are mainly in response to comments received to the 2019 allocation policy and updates to the evidence base. These include:

- New requirements within the first criterion of the policy to ensure that opportunities to restore habitats, strengthen ecological networks and manage the carbon and hydrological implications of development are central to the site's masterplan, having regard to comments from Natural England.

³⁸ Arup (January 2019, and October 2020) Integrated Assessment of the Greater Manchester Spatial Framework

³⁹ Systra (November 2020) Transport Locality Assessments. Introductory note and assessments – Salford Allocations

- A new criterion requiring that development is supported by a robust delivery strategy which is prepared in partnership with stakeholders. This addition is proposed having regard to the number of comments received to this site and the concerns expressed regarding the capacity of existing infrastructure in the area. The site is in multiple ownerships and will need to deliver a range of complementary uses and infrastructure enhancements alongside the housing and will require infrastructure enhancements. This requirement will assist in ensuring that the site allocation is deliverable and manages different interests effectively.
- A new criterion requiring development to minimise impact on local highways and provide contributions to support the improvement of affected local junctions, having regard to the conclusions drawn in the site locality assessment.
- Reference to the development achieving a minimum 10% net gain in biodiversity, consistent with the addition in other policies. This reflects the requirements in the Publication Salford Local Plan: Development Management Policies and Designations which proposes that all major development shall deliver a 10% net gain in biodiversity.
- A new criterion requiring that any planning applications for over 50 dwellings will need to be supported by a project specific Habitats Regulation Assessment, in response to comments made by the Greater Manchester Ecology Unit in the Habitats Regulations Assessment.
- An additional requirement for a hydrological assessment to be undertaken in order to avoid any adverse impacts on the hydrology of Chat Moss, in response to comments made by Natural England.
- A new criterion requiring development to incorporate measures to mimic natural drainage through the use of green sustainable urban drainage to control the rate of surface water run-off, in response to comments made by the Environment Agency.
- A new criterion requiring that development is supported by breeding and winter bird surveys to understand and minimise any adverse impact on bird species in this area, having regard to the ecological appraisal of this site.
- Reference is made to tree planting forming part of the mitigation to address noise associated with the railway line and M62, in response to comments made by City of Trees.

27.4 A copy of the revised policy is provided in appendix 1

28. Conclusion

28.1 The 58.8 hectare site has been identified as being appropriate for development due to its location next to Irlam rail station, with services that provide easy access to the huge range of employment and leisure opportunities in the City Centre and Trafford Park.

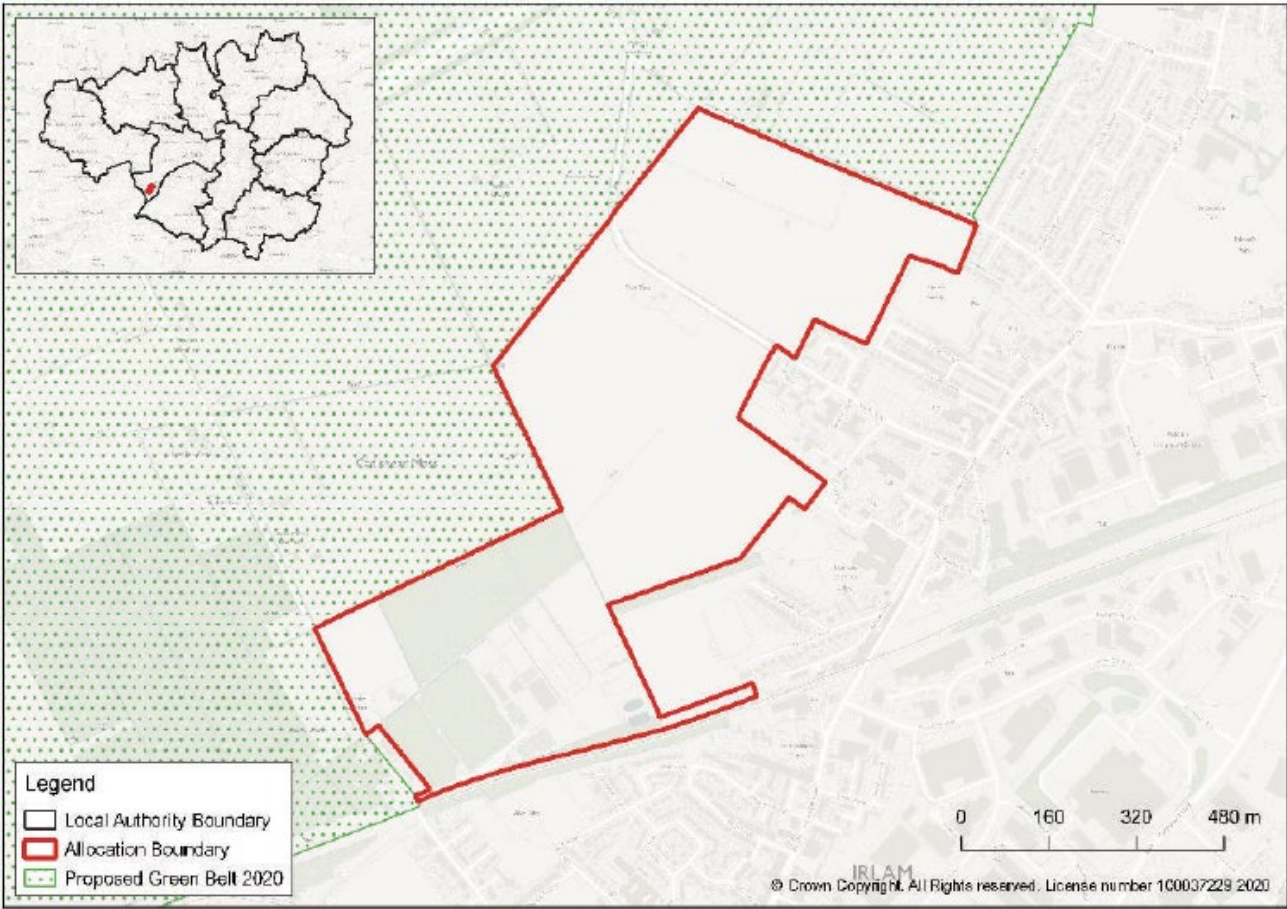
- 28.2 The site could accommodate between 1,100 and 1,400 homes, including 25% affordable housing. Provision would also be made for a school, neighbourhood park, allotments and pedestrian and cycle routes through the site. The homes would be mainly in the form of houses, with higher densities and potentially some apartments in the most accessible parts of the site around the station. The acceptability of the final 300 potential homes is contingent upon further work and potentially enhancements to the wider transport network to create additional capacity.
- 28.3 The site is known to be underlain by peat which presents engineering challenges for development. Ground investigations have been undertaken on the site which indicate that, whilst the ground conditions are more onerous than a conventional development, the conditions can be addressed. Evidence indicates that the site can be viably developed having regard to the requirements of the site allocation policy, including the additional costs associated construction having regard to the site's ground conditions.
- 28.4 The integrated assessment demonstrates that the impacts would be largely positive. Various technical assessments have been undertaken in support of the site, which indicate that whilst there are some constraints that would need to be carefully considered in the site's development, these can be overcome and are reflected in the site allocation policy requirements. Some issues would require further, more detailed assessment (for example in respect of the transport and hydrological impacts and the carbon implications of development) as work is progressed on a masterplan for the site.
- 28.5 The development of a masterplan in consultation with the local community and other stakeholders would be important in ensuring that the development of this site is properly coordinated, sustainable and makes a positive contribution to the existing neighbourhoods.

Section G – Appendices

Appendix 1 – Policy wording for North of Irlam Station allocation (in the 2020 Publication GMSF)

Policy GM Allocation 29

North of Irlam Station



Picture 11.41 GMA 29 North of Irlam Station

Land North of Irlam Station, between New Moss Road and Roscoe Road, will be developed to provide a high quality extension to the Irlam and Cadishead neighbourhood focused around Irlam Station. The site has capacity for around 1,100 - 1,400 dwellings and associated social and community uses. Subject to the conditions set out in this policy, the site is identified for 1,100 homes. The acceptability of the final 300 potential homes is contingent upon further work and

potentially the delivery of enhancements to the wider transport network which create additional capacity to accommodate this volume of further development.

Development of this site will be required to:

1. Be in accordance with a masterplan/framework or Supplementary Planning Document (SPD) that has been developed in consultation with the local community and other stakeholders, and is considered acceptable by the city council, or in the case of an SPD adopted by the city council. Central to the masterplan shall be the consideration of opportunities to restore habitats, strengthen ecological networks, and manage the carbon and hydrological implications of development, having regard to the presence of peat on this site;
2. Be supported by a robust delivery strategy which is prepared in partnership with key stakeholders and, which secures the effective delivery of the full masterplan, including transport, green and social infrastructure, affordable housing and planning obligation contributions;
3. Provide a broad mix of housing with densities increasing towards the most accessible parts of the site around Irlam Station, and include accommodation specifically targeted at older people;
4. Provide an affordable housing scheme equivalent to at least 25% of the dwellings, and substantially more if other funding becomes available to allow for this (with an indicative affordable housing tenure split of 37.5% social rented, 37.5% affordable rented and 25% shared ownership);
5. Minimise the loss of the carbon storage function of the peat and undertake a hydrological assessment in order to avoid any adverse impacts on the hydrology of Chat Moss, whilst ensuring that there is no potential for future problems of land stability or subsidence;
6. Incorporate a high quality network of public routes through the site, connected into the wider pedestrian and cycling network that provides access to local facilities, public transport services, New Moss Wood and Chat Moss;
7. Minimise impact on local highways and provide contributions to support the improvement of affected local junctions;
8. Include a new direct pedestrian and cycle route to Irlam Station from the west and enhance cycle parking and car parking facilities at the station;
9. Ensure that vehicular access to the site does not have an unacceptable impact on the quality of existing residential areas;
10. Integrate high levels of green infrastructure throughout the site, including retaining landscape features such as mature trees and hedgerows, so as to minimise the visual impact on the wider landscape, achieve a minimum 10% net gain in biodiversity, mitigate the environmental impacts of development and provide an attractive backdrop to walking and cycling routes;
11. Support the objectives for the Great Manchester Wetlands Nature Improvement Area and avoid harm to protected species;
12. Be supported by breeding and winter bird surveys to understand and minimise any adverse impact on bird species in this area. Surveys of potential

compensation areas should also be undertaken to demonstrate that displacement into the wider landscape is possible;

13. Be supported by a project specific Habitats Regulations Assessment for any planning applications involving 50 or more dwellings;
14. Minimise the loss of the carbon storage function of the peat and undertake a hydrological assessment in order to avoid any adverse impacts on the hydrology of Chat Moss, whilst ensuring that there is no potential for future problems of land stability or subsidence;
15. Incorporate measures to mimic natural drainage through the use of green sustainable urban drainage to control the rate of surface water run-off;
16. Protect the quality of watercourses through and around the site;
17. Include a new neighbourhood park incorporating an equipped area for play;
18. Include new allotment plots to meet the local standard;
19. Incorporate appropriate mitigation including tree planting to address issues of noise generated by the M62 motorway and the rail line;
20. Set aside land to provide additional school provision, unless it can be demonstrated that sufficient additional school places will be provided off-site within the local area to meet the likely demand generated by the new housing; and
21. Employ methods throughout the construction process that will ensure the potential for archaeology is investigated and any finds safeguarded and properly recorded.

11.269 The site has been identified as being appropriate for development due to its location next to Irlam rail station, with services that provide easy access to the huge range of employment and leisure opportunities in the City Centre and Trafford Park. It also benefits from Northbank Industrial Park just to the south and bus routes to Port Salford and Eccles to the east.

11.270 The size and location of the site means that it has the potential to accommodate a range of dwelling types, helping to meet a variety of housing needs. Higher densities will be appropriate in the most accessible parts of the site immediately around Irlam Station, in accordance with Policy GM-H 4 'Density of New Housing', helping to maximise the number of people within easy walking distance of the station.

11.271 Although the site can accommodate 1,400 new homes, work undertaken to date has only confirmed that the local highway network has capacity to accommodate 1,100. Further work is needed to demonstrate that a further 300 homes can be accommodated; potentially involving additional interventions in the surrounding highway network, particularly linked to Port Salford and the Western Gateway, which will provide additional local and strategic highway capacity.

11.272 The additional population will help to support existing shops and services in Irlam and Cadishead, such as the nearby Lower Irlam and Cadishead local centres, but

the site could potentially accommodate small scale facilities to serve local needs if identified as appropriate through the masterplanning process. It is anticipated that the site's location and the dwelling types provided will be attractive to families with a resulting demand for additional school places which may, at least in part, need to be accommodated within the site.

- 11.273 The site is currently in multiple ownerships and will deliver a range of complementary uses alongside residential (such as education, public open space and green infrastructure) and will require infrastructure enhancements. To ensure the allocation is deliverable, it will be essential that a delivery strategy manages different interests effectively and equitably to secure delivery of the overall masterplan. This is to avoid a situation in which initial phases do not make adequate provision to support subsequent phases, and in particular the community uses these will include.
- 11.274 It will be important that the design and layout of the site effectively integrates development into the existing area and promotes community cohesion. In particular, publicly accessible recreation space, facilities, and routes through the site onto Chat Moss should be positioned so as to be accessible to both new and existing residents.
- 11.275 Most of the site has significant depths of peat across it, meaning that there will be high costs associated with development on it. The peat on the site has been degraded due to decades of drainage and agricultural activity. Nevertheless, it still performs an important carbon storage function, and should be retained wherever possible. However, this will have to be balanced against the need to ensure that there is no risk of subsidence for development on the site or for surrounding infrastructure such as the M62 motorway. The priority for any off-site nature conservation enhancements required to deliver a minimum 10% net gain in biodiversity from the development of the site is likely to be the enhancement of New Moss Wood, and the restoration of lowland raised bog and complementary habitats in Chat Moss to the north. Much of the site is grade 1 agricultural land, but the benefits of delivering additional housing in this accessible location are considered to outweigh the loss of the land's farming potential. Wider ecological surveys, including water vole, brown hare and birds, will be required prior to any development.
- 11.276 For any planning applications within the boundary of the allocation involving 50 or more dwellings, a project specific Habitats Regulations Assessment will be required given that such developments may lead to traffic increases on the M62 motorway because of their size and relative proximity to the motorway. The M62 passes close to designated European sites known to be susceptible to traffic pollution, particularly nitrate deposition.

11.277 The depths of peat heighten the potential for archaeological finds. There will be a need to undertake a detailed archaeological desk-based assessment, including aerial photograph analysis, field walking, historic building assessment, and coring/evaluation trenching of the peatlands, leading to further investigations and recording in advance of and during the construction process.