

# **GM Allocation 30 Port Salford Extension**

## **Topic Paper**

**GMSF 2020**

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# Section A – Background

## Technical assessments

The following technical assessments have been produced on behalf of the majority landowner in support of the GMSF site allocation which they are promoting:

- Delivering a Sustainable Logistics Hub (Peel – April 2018)
- Ecological Representation (TEP - March 2019)
- Geo-environment assessment (Shepherd Gilmour – March 2019)
- High level Archaeological Assessment (Peel – no specified date)
- Noise Review (Cundall – March 2019)
- Site Appraisal – Flood Risk (WSP – March 2019)
- Transport Statement (TTHC – March 2019)
- Utilities Statement (TDS – March 2019)

These documents have not been subject to a comprehensive review by the relevant departments within the city council or any relevant external organisations such as the Greater Manchester Ecology Unit. As such, they are not endorsed by Salford City Council or GMCA at this stage, but rather published for information as key pieces of technical work undertaken on behalf of the majority landowner of the site.

Some of these assessments relate to a wider site boundary which has been promoted by the majority landowner through previous consultation stages of the GMSF. It is considered helpful to publish these documents at this stage, so that people have as much information as possible in making their comments on the Publication Draft GMSF ('2020 GMSF'). The conclusions drawn in these reports are outlined for information, where relevant, in this topic paper.

## 1. Introduction

- 1.1. The extension of Port Salford through this allocation would represent a major expansion of the permitted Port Salford development, taking advantage of the new port facilities, rail link and highway improvements that would have been completed as part of the early phases of Port Salford. This would provide one of the most well-connected and market-attractive industrial and warehousing locations in the country, with a strong focus on logistics activities but also incorporating high quality manufacturing floorspace.
- 1.2. Development would help to significantly boost the competitiveness of Greater Manchester, offering the type of site that can compete with locations internationally for investment. The transport connections mean that the location is particularly attractive for logistics activities, but high quality manufacturing could also be provided in order to diversify the employment and investment opportunities in this part of Greater Manchester.
- 1.3. Significant additional traffic would be generated and so development would have to deliver necessary highway improvements of a strategic and local nature to cater for the additional traffic created by the expansion of Port Salford in a way that is compatible with any proposals for the enhancement of the wider motorway network and ensures the safe and efficient operation of the local road network.

- 1.4. The retention of the Green Belt to the west and east of the site would help to prevent the further coalescence of Irlam and Eccles. It would be important to make positive use of this Green Belt, including by expanding the facilities at Brookhouse Playing Fields to the east, and there may be opportunities to retain/reconfigure the former golf course to the west of the site.

## **2. Site Details**

- 2.1. The 108.6ha site is an extensive area of land between the A57 Liverpool Road and the M62 motorway. The southern area of the site forms part of the former Boysnope Golf Course. The remainder of the site to the north and west is farmed. Barton Aerodrome (City Airport and Heliport) is located to the south of the site and is an important facility for Greater Manchester.
- 2.2. The vast majority of the site is located within the ward of Irlam with a small part in the Winton ward. All of the site is designated as Green Belt in saved unitary development plan (UDP) policy EN1. The north eastern part of the site, (to the east of Barton Moss Road), is designated as mosslands in saved UDP policy EN11. Fox Hill Glen Site of Biological Importance is located to the east of the allocation boundary. Much of the site is grade 1 agricultural land.

## **3. Proposed Development**

- 3.1. The proposed allocation is for 320,000sqm of employment floorspace, with a strong focus on logistics activities but also incorporating high quality manufacturing floorspace. The extension of Port Salford would complement an initial phase of development to the south of the A57 would provide around 150,000 sqm of employment floorspace.
- 3.2. The precise nature of employment uses on the site and the layout of development will 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. Appendix 1 sets out the policy wording and boundary for the Port Salford expansion as set out in the 2020 Publication version of the GMSF.
- 3.4. 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
  - Updates to the transport evidence base (in the locality assessment<sup>1</sup> prepared for the site)
  - The findings of the Habitats Regulations Assessment
- 3.5. Key changes between the 2019 and 2020 plans are set out below:

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

- Deletion of reference to the site being served by a single primary vehicular access from the A57 opposite the existing Port Salford access
- Amended the policy to make it clear that justification and full compensation for the loss of the golf course should be in accordance with paragraph 97 of the NPPF (February 2019) or any subsequent revision of national planning policy
- Added specific reference to development achieving a minimum 10% net gain in biodiversity
- Made it clear that development should deliver necessary highway improvements of a strategic and local nature to cater for the additional traffic created by the expansion of Port Salford in a way that is compatible with any proposals for the enhancement of the wider motorway network and ensures the safe and efficient operation of the local road network
- Reference added to development enhancing public transport services
- Any planning applications for over 1,000sqm of floorspace will need to be supported by a project specific Habitats Regulation Assessment

#### **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 background paper published alongside the GMSF<sup>2</sup>.
- 4.2. The Port Salford extension allocation has been selected on the basis of a number of the site selection criteria as follows:
- Criterion 2 – Land that is able to take advantage of the key assets and opportunities that genuinely distinguish Greater Manchester from its competitors: As noted in paragraph 7.2 of the site selection topic paper there are two key assets which are located within or close to the Green Belt boundary in Greater Manchester, one of which is Port Salford (and the other being Manchester Airport / HS2 Airport Station)
  - Criterion 5 – Land which would have a direct significant impact on delivering urban regeneration: The allocated land is located in an area of high deprivation Using the 10% most deprived Lower Super Output Areas (LSOAs) in the Index of Multiple Deprivation (IMD) for England.
  - Criterion 6 – Land where transport investment (by the developer) and the creation of significant new demand (through appropriate development densities), would support the delivery of long-term viable sustainable travel options and delivers significant wider community benefits: In this instance the proposal has the potential to contribute to a business case to extend the Trafford Park Metrolink line over the Manchester Ship Canal into Salford which could have wider benefits for the area including access to the AJ Bell stadium.

#### **5. Planning History**

- 5.1. Part of the proposed allocation boundary overlaps with the planning applications for the permitted Port Salford development, realignment of the A57, M60 junction improvements and also the WGIS scheme. In addition, part of the red line for the new stadium and associated development extends over the southern part of the site.

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<sup>2</sup> GMCA (September 2020) GMSF Site Selection Background Paper

Permission has also been granted for some exploratory digging for coal bed methane on the site in 2010.

## 6. GMSF 2019 Consultation Responses

- 6.1 The majority landowner supports the allocation and proposes its expansion on land to the west to increase the floorspace accommodated to around 343,000sqm. They also consider amendments are needed to the policy criteria to remove onerous, unnecessary and over prescriptive requirements.
- 6.2 Objections received were significantly fewer in number than other allocations in the city however the largest numbers related to issues of traffic congestion and associated issues of air pollution. Reference was made to a lack of progress on the infrastructure committed as part of the permitted Port Salford and the need for improved connections. A number of representations questioned the extent users would rely on rail and water connections.
- 6.3 Concerns were also raised in respect of the need for the scheme post-Brexit, the availability of brownfield alternatives, loss of Grade 1 agricultural land, loss of Green Belt and Green infrastructure, loss of habitats (including protected species), the potential release of carbon from development on peat and the proposals compatibility with nature improvement area objectives and potential impact on the Manchester Mosses Special Area of Conservation.

## 7. GMSF Integrated Assessment

- 7.1. A summary of the integrated assessment<sup>3</sup> 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. There are negative impacts identified in relation to flood risk, although only 2% of the site is within a zone at risk of flooding. 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).

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,	Neutral impact as no housing proposed on site.	No mitigation identified.

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

Objective	Summary of assessment and mitigation identified	Action on mitigation
and to support economic growth		
2 Provide a sustainable supply of employment land to ensure sustainable economic growth and job creation	<p>Very positive impacts due to provision of employment site and location near to existing bus stops.</p> <p>Suggested mitigation was to reference the size of the site and type of employment proposed.</p>	<p>Allocation policy states around 320,000 sq m of industrial and warehousing floorspace would be provided.</p>
3.Ensure that there is sufficient coverage and capacity of transport and utilities to support growth and development	<p>Very positive impacts in relation to the provision of railway link, highway improvements, walking and cycling routes and potential Metrolink extension.</p> <p>Neutral impacts in relation to digital and utilities infrastructure. A feasibility study into requirements is recommended.</p>	<p>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.</p>
4.Reduce levels of deprivation and disparity	<p>Identified impacts as neutral as it was considered uncertain that development would affect deprived areas.</p> <p>Mitigation identified in respect of considering deprived areas in relation to benefits such as creation of construction and operational employment, or improved transport links or increases in the range of community facilities.</p>	<p>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 associated policy requirements.</p> <p>It is also addressed by GMSF thematic policies GM-E 1, GM-E 4, GM-E 5 and GM-P 1.</p>
5.Promote equality of opportunity and the elimination of discrimination	<p>Some positive impacts due to the mention within the policy of high levels of community engagement.</p> <p>Suggested mitigation was to clarify if engagement would be during construction or operation and whether it would identify local employment opportunities.</p>	<p>The level of detail suggested was not considered appropriate for inclusion within the policy, which already requires high levels of community engagement. Other issues of equality and opportunity area addressed in thematic policies of the GMSF</p>

Objective	Summary of assessment and mitigation identified	Action on mitigation
		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/landscaping, walking and cycling routes through the site and mitigating environmental impacts.	No mitigation identified.
7. Ensure access to and provision of appropriate social infrastructure	Neutral impacts identified. It is noted that as the proposal is employment development it is unlikely to provide social infrastructure.	The issues are adequately addressed in the thematic policies of the GMSF and Local Plan.
8. Support improved educational attainment and skill levels for all	Neutral impacts.  Recommended new employment should be linked to provision of training and education such as apprenticeships	The recommendation is partly addressed though thematic policy GM-E 5 and by policies in the Local Plan.
9. Promote sustainable modes of transport	Very positive impacts due to railway link, highway improvements, walking and cycling routes, bus stops and potential Metrolink extension.  Suggested mitigation: include reference to enhancing sustainable transport and maximising the benefits from use of existing facilities	The recommendation is addressed by thematic policies.
10. Improve air quality within Greater Manchester, particularly in the 10 Air Quality Management Areas (AQMAs)?	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.  Recommended mitigation: <ul style="list-style-type: none"> <li>• Minimise number of trips made by private car</li> <li>• Green infrastructure</li> </ul>	The issues identified can be addressed through masterplanning. The issues are also 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

Objective	Summary of assessment and mitigation identified	Action on mitigation
	<ul style="list-style-type: none"> <li>Incentivise electric vehicles</li> </ul>	green infrastructure within development.
11. Conserve and enhance biodiversity, green infrastructure and geodiversity assets	Impacts recorded in 2019 were largely uncertain; impacts recorded in 2020 positive overall, following the inclusion of a requirement for minimum 10% net gain in biodiversity. Policy also includes the need to incorporate landscaping and retain or replace hedgerows and ponds.	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 the GMSF and Salford Local Plan.
12. Ensure communities, developments and infrastructure are resilient to the effects of expected climate change	Negative impact due to 2% of the site being located within a flood zone.	Flood risk has been addressed through the strategic flood risk assessment and given the less vulnerable nature of the proposed use and the small area of the site within a flood zone it is not considered to require further mitigation beyond the existing requirement within the policy to mitigate surface and ground water flood risk. Climate change adaptation is addressed further within the thematic policies.
13. Reduce the risk of flooding to people and property	Impacts identified were mixed. A negative score was awarded due to the location of a corner of the site within a flood zone; positive scores were awarded in relation to mitigation within the policy. A negative score was awarded overall in 2020.	Flood risk has been addressed through the strategic flood risk assessment and given the less vulnerable nature of the proposed use and the small area of the site within a flood zone it is not considered to require further mitigation beyond the existing requirement within the policy to mitigate surface and ground water flood risk. Climate change adaptation is addressed further within the thematic policies.

Objective	Summary of assessment and mitigation identified	Action on mitigation
14. Protect and improve the quality and availability of water resources	Positive impact identified.	Allocation policy now includes requirement for sustainable drainage measures. Further mitigation is provided within thematic policy GM-S 5.
15. Increase energy efficiency, encourage low carbon generation and reduce greenhouse gas emissions	<p>Neutral and positive impacts were recorded due to references within policy to active travel and public transport. Negative/uncertain impacts were recorded due to there being no mention of low carbon or renewable energy facilities.</p> <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>Issues are addressed in thematic policies in the GMSF and a number of policies within the Publication Salford Local Plan including in 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>Positive and negative impacts recorded in relation to heritage assets, as there is wording within the policy to mitigate impact on heritage assets. It is suggested that heritage receptors should be considered throughout detailed design.</p>	Issues are addressed in thematic policies of the GMSF and Local Plan and existing references within the allocation policy.
17. Ensure that land resources are allocated and used in an efficient and sustainable manner	<p>Major negative impacts identified resulting from the development of greenfield land in agricultural use.</p> <p>Suggested mitigation was:</p> <ul style="list-style-type: none"> <li>• consider how PDL development and the</li> </ul>	Previously developed land opportunities within the city are identified through Salford's Housing and Economic Land Availability Assessment (and brownfield register). No

Objective	Summary of assessment and mitigation identified	Action on mitigation
<p>to meet the housing and employment needs of GM, whilst reducing land contamination</p>	<p>development of derelict land, properties and infrastructure could be encouraged as a result of development</p> <ul style="list-style-type: none"> <li>• further research into agricultural land quality</li> </ul>	<p>particular opportunities relating specifically to the site are apparent.</p> <p>Issues are addressed within the thematic policies of GMSF and Local Plan.</p>
<p>18. Promote sustainable consumption of resources and support the implementation of the waste hierarchy</p>	<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. 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. Planning permission is in place to deliver Port Salford on land between the Manchester Ship Canal and the A57 in Irlam. To date one warehouse building has been completed, however the scheme would in total provide around 150,000sqm of warehouse space along with a freight handling facility accessible by a rail spur onto the Chat Moss line and canal berths on the Manchester Ship Canal. As a tri-modal freight facility providing a hub for distribution Port Salford would enable greater quantities of freight to be moved by modes other than HGV. Whilst this is expected to bring with it wider sustainability benefits, it is recognised that as a hub of activity, it would attract additional freight-based vehicle movements within the immediate vicinity of the site.
- 8.2. Port Salford is identified as one of Greater Manchester's key assets which genuinely distinguishes the conurbation from its competitors. The Port Salford Extension allocation would provide a further 320,000sqm of warehouse/manufacturing floorspace on Green Belt land to the north of the A57. The site has been selected to contribute to Greater Manchester requirements in order to capitalise on the opportunity presented by Port Salford's tri-modal connections in terms of encouraging the sustainable movement of freight and attracting investment to the sub-region.
- 8.3. A Locality Assessment<sup>4</sup> 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 assessment indicates that significant issues are forecast to be experienced at the M60 junctions 11 and 10. Whilst traffic from this allocation is not the only contributory factor at these junctions, it is expected to have a significant impact at junction 11 and on some junctions along the A57, including the A57 Liverpool Road/ Stadium Way junction. At present, the assessment identifies considerable constraints, both from an infrastructure and cost perspective that would need to be overcome.
- 8.4. It is considered that the conclusions drawn in the assessment present a worst-case scenario which do not reflect the most likely level of impact, for the reasons explained below. Whilst the landowner has indicated that they have aspirations for a link road connecting the A57 with the M62, due to the uncertainty over the deliverability of this, the locality assessment assumes that access is provided solely from the A57. In addition, generic trip rates and distribution have been applied to all GMSF allocations. Whilst this represents a consistent and defensible method, it presents a worst-case scenario which is particularly notable for Port Salford Extension, where the purpose of the development is specifically to deliver modal shift from conventional HGV movements toward sustainable transport of goods via water and rail. It is therefore considered necessary to undertake further work to assess the allocation in greater detail taking into account the unique nature of the development. This work would be coordinated with partners including Highways England, who are leading a study into the operation of the Strategic Road Network within Manchester's North West Quadrant.

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

8.5. Whilst freight movements are a key focus of the allocation, consideration of how employees access the allocation is important. Bus services on the A57 provide access to the city centre and nearby railway (Irlam and Patricroft), and Metrolink (Eccles and Trafford Centre) stations are accessible by bicycle or local bus services, providing greater opportunities to travel using public transport. This would be further enhanced through improvements to bus service frequencies and the development of new alignments and service improvements for rapid transit within the vicinity. The assessment identifies that the following schemes would support the allocation, which are reflected in criteria 6 and 7 of the site allocation policy:

- Cheshire Lines Committee (CLC) line capacity improvements
- Development of tram-train services on the CLC line
- Metrolink extension to Port Salford
- Irlam/ Cadishead viaduct pedestrian and cycling infrastructure

8.6. With regards to walking and cycling access, the A57 has a shared footway/cycleway connecting the allocation with Irlam and Cadishead and Peel Green. A mix of on-carriageway cycle lanes and off-carriageway shared cycle/footways serve the residential area of Irlam and the railway station which benefits from a cycle hub. The Part WGIS scheme provides access to the east of the M60 and the Trafford Centre. The assessment recommends the following improvements to cycling and walking access and its integration with public transport, which are reflected in the site allocation policy, namely criteria 6 and 7:

- Safe walking and cycling routes passing through the allocation, to access the A57 Liverpool Road.
- Maintaining existing public rights of way (PROW) and upgrading sections that run through the allocation
- Good connectivity with the Bee network

8.7. The impacts of these sustainable transport interventions are underestimated in the assessment undertaken to date, which should be considered to be a 'worst case' scenario as it does not take full account of the extensive opportunities for active travel and public transport improvements in the local area.

## **9. Flood Risk and Drainage**

9.1. The site is almost entirely within Flood Zone 1, with the exception of a very small area of the site (about 2% by area) at the eastern corner which is within Flood Zone 2. The Strategic Flood Risk Assessment<sup>5</sup> concluded that development is appropriate in flood risk terms, subject to a site specific flood risk assessment at the planning application stage.

9.2. There is little risk from surface water flooding across most of the site. However, there is an area at the narrow "neck" at the centre of the site where modelling suggests surface water may pool at depths of up to 60cm in a 1 in 30 year flood, and at up to 90cm in an extreme (1 in 1000 year) event. Other smaller areas of shallow (up to 30cm) surface water flood risk are shown on other parts of the site. Surface water flood risk can be addressed however as part of the drainage design for the site.

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

## 10. Ground Conditions

- 10.1. A geo-environmental site assessment has been produced on behalf of the majority landowner which considers geo-technical and ground contamination issues on the site<sup>6</sup>. This has been published for information alongside the 2020 GMSF. The assessment summarises the existing British Geological Society (BGS) records on the site and explains that whilst peat deposits are not present across much of the southern part of the site, peat may be present in the central and northern areas of the site with a typical thickness of approximately 2 metres. The report discusses that in the areas of deeper peat, specialist foundation techniques may be required.
- 10.2. Agricultural land data suggests that majority of the site comprises grade 1 agricultural land (grades 1 to 3a are defined as the best and most versatile agricultural land). The majority landowner considers that the site does not comprise best and most versatile agricultural land, based on its understanding of the site and its experience of farming it. The unique economic opportunity provided by the location is considered to outweigh the loss of the land's farming potential.

## 11. Utilities

- 11.1. United Utilities has advised that there is a small distribution main through the middle of the site, following an existing road. Whilst this should not constrain the site's development, it would need to be planned around. Taking into account the size of the allocation, early engagement with United Utilities will be important as details of the scheme is worked up to ensure sufficient capacity in the surrounding network.
- 11.2. Electricity North West (ENWL) estimates that the total electrical (i.e. the peak demands used to determine the size of the connections required for each development) demand associated with this site is 32MW. 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 impact of all of the proposed development 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.
- 11.3. 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

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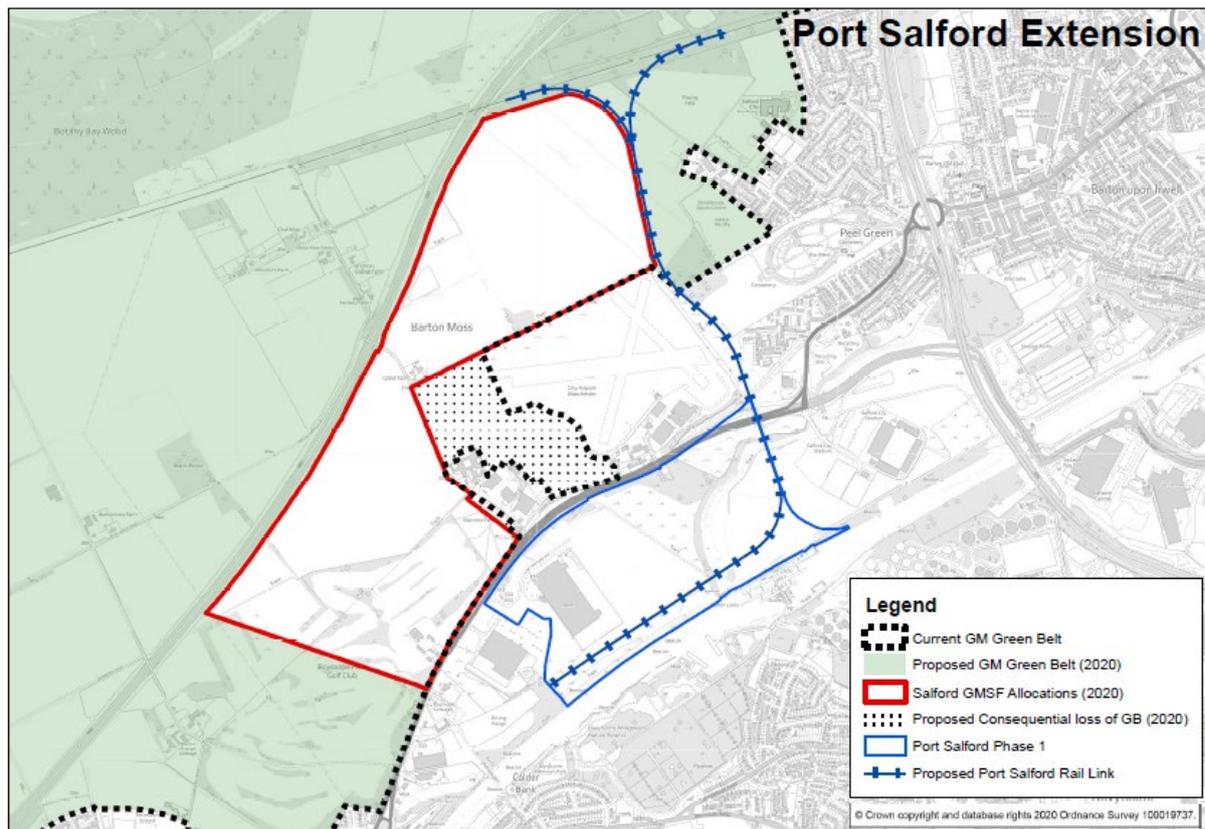
<sup>6</sup> Shepherd Gilmour (March 2019) Phase 1 Geo-environmental site assessment: GM Allocation 33 – Port Salford extension

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 will 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 124.2 hectares of existing Green Belt. 108.6 hectares within the development allocation itself and a further 15.6 hectares as a result of the removal of land within the operational area of Barton Aerodrome and existing dwellings (and adjoining land) to the east of the allocation which would become detached from the wider Green Belt.



### *Exceptional Circumstances*

- 12.2. The strategic level exceptional circumstances that have required the identification of site allocations within the Green Belt are set out in detail in a background paper<sup>7</sup>, with 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.
- 12.3. The Port Salford Extension site has been selected to deliver part of the identified requirement, primarily given its proximity to the tri-modal connections to be provided as part of the permitted Port Salford to the south of the A57. Port Salford is identified as a key asset that genuinely distinguishes Greater Manchester from its competitors<sup>8</sup>, and additional employment floorspace in its proximity provides a particular opportunity to support the sustainable movement of freight.

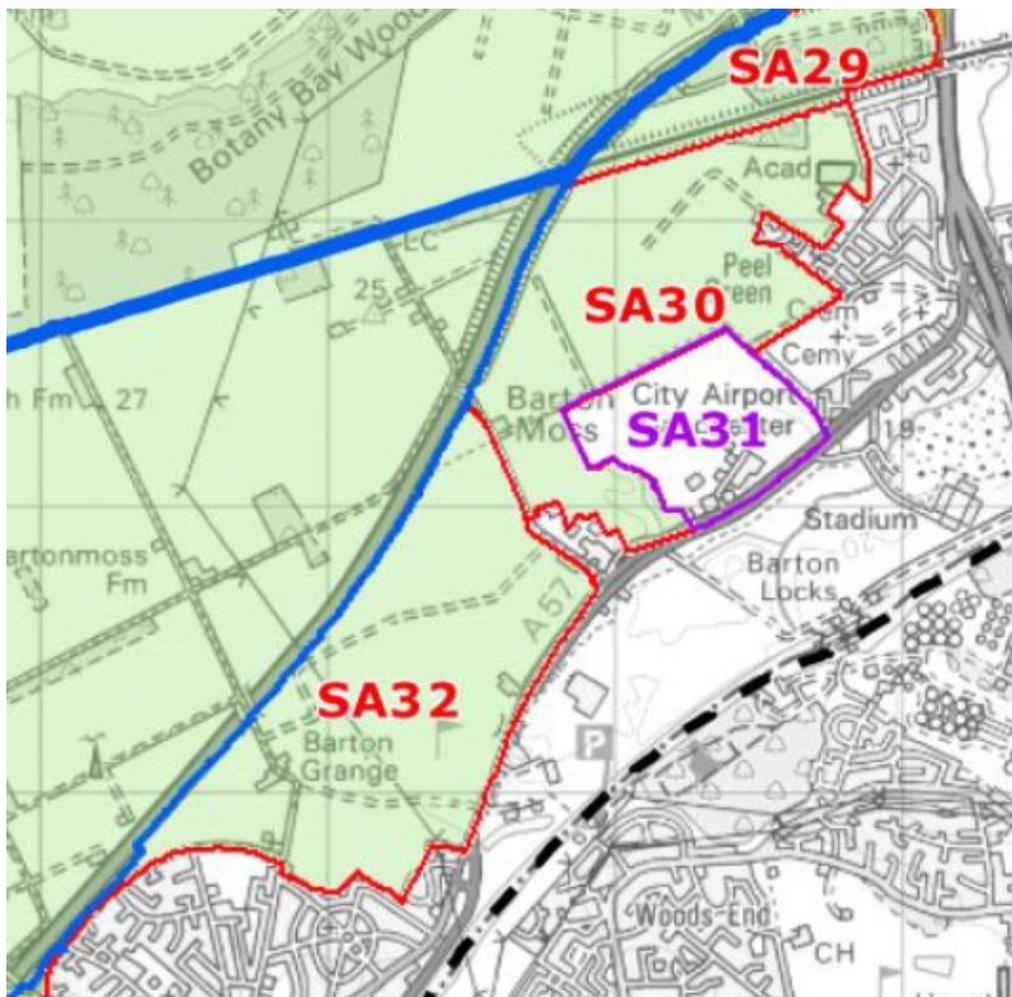
<sup>7</sup> GMCA (October 2020) Our Exceptional Circumstances

<sup>8</sup> GMCA (September 2020) GMSF Site Selection Background Paper – criterion 2

- 12.4. In addition to the above, the site has also been identified as consistent with two separate criteria under the GMSF site selection framework, namely criterion 5 given the potential to provide additional employment in proximity to deprived communities, and also criterion 6 (potentially contributing to the business case to extend the Trafford Park Metrolink line over the Manchester Ship Canal into Salford).
- 12.5. The provision of 320,000 square metres of logistics based floorspace would make a significant contribution to the employment supply across Greater Manchester and has the potential to support the delivery of a larger and more sustainable logistics sector.

*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 2016<sup>9</sup>. The allocation was assessed as part of two separate parcels (SA30 and SA32) in that document, which also included land to the immediate north, east and south.



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

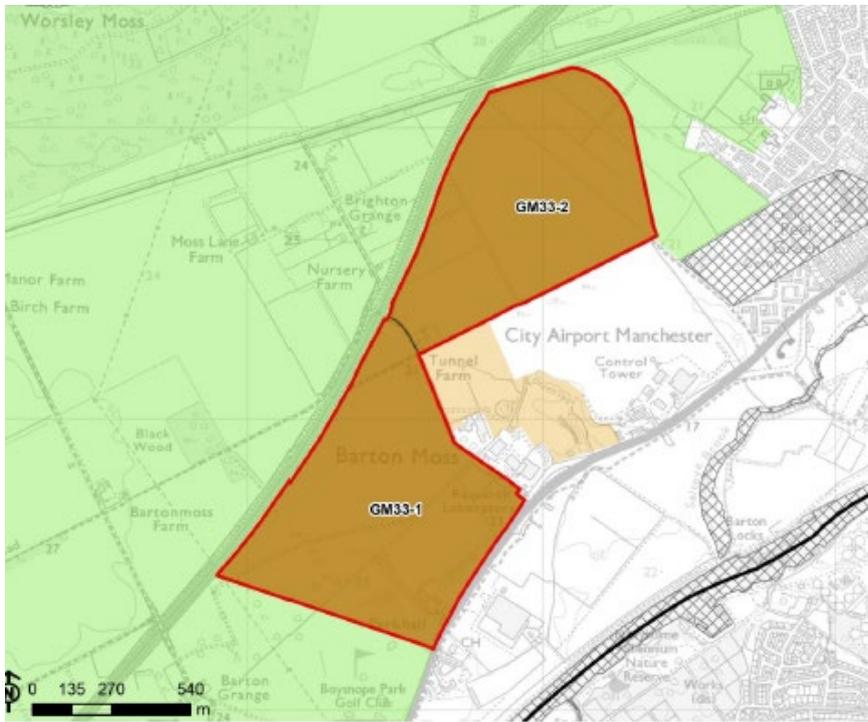
<sup>9</sup> LUC (2016) Greater Manchester Green Belt Assessment

	Parcel SA30		Parcel SA32	
GB Purpose	Assessment	Conclusion on contribution	Assessment	Conclusion on contribution
<b>Purpose 1 - Check the unrestricted sprawl of large built up areas</b>				
1a - Does the parcel exhibit evidence of existing urban sprawl and consequent loss of openness?	Limited urbanising features within the parcel. Strong sense of openness. Plays some role in checking the unrestricted sprawl of Peel Green. Planned development includes a railway line as part of Port Salford scheme to the south of Liverpool Road.	Strong	A few urbanising features within the parcel. Strong sense of openness. The parcel plays a strong role in checking the unrestricted sprawl of Irlam.	Strong
1b - Does the parcel protect open land from the potential for urban sprawl to occur?	The parcel plays some role in inhibiting ribbon development east of Barton Moss Road and north of Buckthorn Lane.	Moderate	The parcel plays a strong role in inhibiting ribbon development south of Barton Moss Road and west of the A57 and along the internal access road Fiddlers Lane to the south-west.	Strong
<b>Purpose 2 – To prevent neighbouring towns merging into one another</b>				
Does the parcel prevent the merging or erosion of the visual or physical gap between neighbouring settlements?	Forms part of a gap between Eccles and Boothstown and Irlam. Loss of openness within the parcel would lead to a narrowing of the gap between the settlements	Weak	Forms part of a gap between Irlam and Eccles and creates a sense of separation when travelling along the A57. The significant amount of	Moderate

	Parcel SA30		Parcel SA32	
GB Purpose	Assessment	Conclusion on contribution	Assessment	Conclusion on contribution
	but they would still be perceived as being separate.		development taking place south of the A57 would increase the importance of this parcel in preventing the further merging of settlements.	
<b>Purpose 3 – To assist in safeguarding the countryside from encroachment</b>				
Does the parcel have the characteristics of countryside and/or connect to land with the characteristics of countryside?  Has the parcel already been affected by encroachment of urbanised built development?	A limited sense of urban encroachment. Displays some of the characteristics of the countryside, but lacks a strong rural character. Neighbouring urban development, including airport activities, has a visual influence on the rural character in parts.	Moderate	A limited sense of urban encroachment. The parcel still displays some of the characteristics of the countryside. Neighbouring urban development has a limited visual influence.	Moderate
<b>Purpose 4 - To preserve the setting and special character of historic towns</b>				
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
<b>Purpose 5 - Assist in urban regeneration by encouraging the recycling of derelict and other urban land</b>				
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 undertaken<sup>10</sup>. This focuses on the allocation boundary as proposed in the Revised Draft GMSF published in 2019<sup>11</sup> and as shown in the image below<sup>12</sup>. Only a very minor change to the boundary has been proposed in the latest version of the GMSF (2020) comprising the removal of existing dwellings (and adjoining land) along Barton Moss Road. This change does not affect the conclusions reached in relation to the earlier version of the allocation.



12.9. The new Green Belt boundary to the north the allocation would be formed by proposed rail line into phase 1 of Port Salford to the south of the A57. To the west the boundary would be formed by M62 motorway. To the south the allocation and Green Belt boundary drawn reflects the indicative line of a potential road link from the A57 to the M62. Work is continuing in relation to the potential benefits of this road link, its deliverability and its precise location. However, notwithstanding this, an appropriate boundary treatment to the west could be determined through masterplanning.

12.10. The northern and southern parts of the allocation (as shown in the image above) have been assessed individually as to the potential harm to the Green Belt from their release. However similar conclusions have been drawn in respect of both parts, with the GM Assessment of proposed allocations describing that the release “would constitute relatively significant sprawl and encroachment onto the countryside and a relatively limited impact on preventing the merger of towns” and that “it would constitute a negligible weakening of retained Green Belt land”. Both parts are considered to cause a moderate level of harm overall<sup>13</sup>.

<sup>10</sup> LUC (September 2020) Stage 2 Greater Manchester Green Belt Study, Assessment of Proposed 2019 GMSF Allocations

<sup>11</sup> GMCA (January 2019) Revised Draft Greater Manchester Spatial Framework

<sup>12</sup> LUC (September 2020) Stage 2 Greater Manchester Green Belt Study, Assessment of Proposed 2019 GMSF Allocations, Appendix B, page 193

<sup>13</sup> LUC (September 2020) LUC/ GMCA (September 2020) Stage 2 Greater Manchester Green Belt Study, Assessment of Proposed 2019 GMSF Allocations, pages 195 and 197

12.11. A 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 Allocations <sup>14</sup>, is provided in the table below.

Impact on Green Belt purposes:

	<b>GM33/1 (southern sub-area)</b>		<b>GM33/2 (northern sub-area)</b>	
<b>Green Belt Purpose</b>	<b>Impact</b>		<b>Impact</b>	
Purpose 1 – Check the unrestricted sprawl of large built-up areas	Relatively significant	The sub-area's release would constitute sprawl. It is open and has some distinction from the urban edge, contributing to its role in preventing sprawl.	Relatively significant	The sub-area's release would constitute sprawl. The sub-area is open, however the lack of distinction from the inset edge limits to an extent its role in preventing sprawl.
Purpose 2 – Prevent neighbouring towns merging into one another	Relatively limited	The sub-area lies between Urmston & Davyhulme and Eccles, and Irlam and Eccles. However, all three towns are already linked to a significant degree, limiting this land's role in preserving the gap.	Relatively limited	The sub-area lies between the towns of Urmston & Davyhulme and Eccles, and Irlam and Eccles. However, all three towns are already linked to a significant degree, limiting this land's role in preserving the gap.
Purpose 3 – Assist in safeguarding the countryside from encroachment	Relatively significant	The release would encroach on land which, despite a degree of containment, retains openness and is generally perceived as countryside.	Relatively significant	Its release would encroach on land which is perceived as countryside and has a relatively strong relationship with adjacent open land.
Purpose 4 – Preserve the setting and special character of historic towns	Limited	Land does not make a significant contribution to the setting of any historic town.	Limited	Land does not make a significant contribution to the setting of any historic town.

<sup>14</sup> LUC (September 2020) LUC/ GMCA (September 2020) Stage 2 Greater Manchester Green Belt Study, Assessment of Proposed 2019 GMSF Allocations, Appendix B page 195 and 197

	<b>GM33/1 (southern sub-area)</b>		<b>GM33/2 (northern sub-area)</b>	
Green Belt Purpose	Impact		Impact	
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.	Equal contribution	All Green Belt land is considered to make an equal contribution to this purpose.

Impact on adjacent Green Belt:

	<b>GM33/1 (southern sub-area)</b>		<b>GM33/2 (northern sub-area)</b>	
Green Belt Purpose	Impact		Impact	
	No/ negligible  The release of the sub-area would increase to an extent the containment of retained Green Belt land at the former golf course to the south, which would as a result be bound to the northeast, southwest and southeast by urbanising uses. However, this land does not make a greater contribution to the Green Belt purposes and as such its containment would not increase harm. In addition, it would also result in a distinct revised Green Belt boundary to the west, which would be defined by the M62 motorway.		No/ negligible  The release of this sub-area would lead to some degree of containment of retained Green Belt land to the east between the M60 and M62, however the latter contributes little to Green Belt purposes due to its containment and lack of distinction with the urban edge and as such its containment would not increase harm. The release would also result in a distinct revised Green Belt boundary to the west, defined by the M62, a railway line, the emerging Port Salford Rail link and Barton Moss Road.	

12.12. The cumulative impact of all changes to the Green Belt proposed through the GMSF has also been assessed<sup>15</sup>. In this context it is identified that the release of the allocation would constitute sprawl and encroachment into the countryside. It is also identified that the allocations release would lead to greater containment of the remaining Green Belt to the south and north east. The allocation is identified as lying between Urmston and Eccles, as well as between Irlam and Eccles, but it is described that these settlements are already linked to a significant degree.<sup>16</sup>

*Mitigation to address Green Belt harm*

<sup>15</sup> LUC (September 2020) Stage 2 Greater Manchester Green Belt Study, Cumulative Assessment of Proposed 2020 GMSF Allocations and Additions

<sup>16</sup> LUC (September 2020) Greater Manchester Green Belt Cumulative Harm Assessment (Strategic Area 7), page 22

12.13. The principal cause of harm to the Green Belt is from the loss of Green Belt land within the Allocation itself and as such “mitigation measures would not reduce the harm of release of this Allocation”<sup>17</sup>.

12.14. Nevertheless, 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 undertaken<sup>18</sup>.

12.15. The assessment identifies a number of potential projects as listed below<sup>19</sup>:

Potential enhancement projects	
<b>Access</b>	
1.	Potential creation and improvement of PRowS, including upgrades to the Salford Trail.
2.	Green corridor enhancements.
<b>Sport and recreation</b>	
3.	Potential improvements and refurbishments to community facilities, including potential new allotments at Brookhouse Community Centre.
4.	Consider improvements to playing field pitches and ancillary facilities.
<b>Biodiversity and wildlife corridors</b>	
5.	Potential restoration of mossland areas and establishment of peatland restoration schemes.
<b>Landscape and visual</b>	
6.	Potential species rich hedgerow restoration within Mosslands and Lowlands Farmlands LCT.
7.	Potential ditch restoration works within Mosslands and Lowlands Farmlands LCT.
8.	Consider woodland extension opportunities at Brookhouse Community Woodland.
9.	Enhance the ecological and hydrological beneficial features within the area of retained green belt by combining flood risk reduction with green infrastructure improvements.

12.16. 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 - Provide high quality walking and cycling routes from across the site to the bus stops on the A57 and the wider pedestrian and cycling network including Port Salford Greenway;
- Criterion 9 - Conserve and where appropriate enhance, the significance of surrounding designated and non-designated heritage assets, including by:
  - i. Designing and landscaping the development to minimise any adverse impacts on the setting of Barton Aerodrome and the listed buildings within it;

<sup>17</sup> LUC (September 2020) Greater Manchester Green Belt Harm Assessment, Appendix B page 193

<sup>18</sup> 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

<sup>19</sup> 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

and

- ii. Where harm to Barton Aerodrome and any heritage asset within it is justified, opportunities shall be sought to better reveal the significance of the heritage asset, securing repairs to them, improving public access to them and/or providing publicly accessible information about them;
- Criterion 10 - Justify and provide full compensation for the loss of the golf course in accordance with paragraph 97 of the NPPF (February 2019) or any subsequent revision of national planning policy;
  - Criterion 11 - Incorporate high levels of landscaping, including the retention or replacement of existing woodland, hedgerows and ponds where practicable, so as to minimise the visual impact on the wider landscape (including on the remaining Green Belt separating the site from Irlam), achieve a minimum 10% net gain in biodiversity and mitigate the environmental impacts of development including noise;
  - Criterion 12 - Support the objectives for the Great Manchester Wetlands Nature Improvement Area and avoid harm to protected species;
  - Criterion 13 - 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 is possible into the wider landscape;
  - Criterion 14 - Protect and enhance surrounding habitats, including the Foxhill Glen Site of Biological Importance;
  - Criterion 15 - Be supported by a project specific Habitats Regulation Assessment for any planning applications involving a floorspace of 1,000 sqm and above;
  - Criterion 17 - Minimise the loss of the carbon storage function of the peat and avoid any adverse impacts on the hydrology of surrounding areas of peat/mossland, whilst ensuring that there is no potential for future problems of land stability or subsidence;

### *Summary*

12.17. 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” impact of adjacent Green Belt land. The Port Salford Extension allocation provides a high quality warehouse/manufacturing development opportunity, benefitting from the tri-modal connections to be provided as part of the permitted Port Salford to the south of the A57, which is identified as one of Greater Manchester’s key economic assets. With a focus on logistics uses and the potential to accommodate around 320,000sqm of floorspace the site could make a significant contribution to sub-regional requirements and contribute to a larger and more sustainable logistics sector.

## **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 records<sup>20</sup>. This does not preclude development, but it does highlight the importance of high levels of green infrastructure provision within the development, as required by the site allocation policy.

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<sup>20</sup> GMCA (May 2018) The Natural Environment: Priority Green and Blue Infrastructure

- 13.2. There are public rights of way along the boundaries of the site (on Twelve Yards Road and Barton Moss Road) and these cross a small area of the site near the motorway. The rights of way are footpaths although these are potentially also used for cycling. Concerns have been expressed about the loss of recreation opportunities and loss of green space valued by residents in response to the consultation on the Draft and Revised Drafts of the GMSF.
- 13.3. There are a number of criteria proposed within the policy to mitigate impacts of the development of this site on green infrastructure. These include:
- Incorporate high levels of landscaping including the retention of existing landscape features where practicable and
  - Protect and enhance surrounding habitats.
- 13.4. In addition, Salford Local Plan Policy GI2 Chat Moss 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 (in line with paragraph 22.9 of the Local Plan).
- 13.5. Concerns have been expressed about the loss of carbon stored within the peat. Potential options to mitigate effects on stored carbon of this development would need to be considered in working up a detailed scheme for the site. The allocation policy requires the loss of carbon storage to be minimised.
- 13.6. A number of potential enhancements to green infrastructure on the site and in surrounding areas are suggested in the Green Belt Opportunities work<sup>21</sup>. These opportunities and the potential deliverability of them would be considered through the masterplanning and planning application stages.

## **14. Recreation**

- 14.1. The allocation policy requires that full compensation for the loss of the golf course is provided. Consultation would be required with Sport England and England Golf to identify appropriate mitigation.

## **15. Landscape**

- 15.1. The Greater Manchester Landscape Character and Sensitivity Assessment 2018<sup>22</sup> identified the landscape character type to be “Mosslands and lowland farmland”. This assessment was informed by the Landscape Character Assessment published by Salford City Council in 2007<sup>23</sup>, for those sites within Salford. This identified the area as “Rural Mosslands: sub area 2 Southern Chat Moss”. Features of the Southern Chat Moss sub area (and that are applicable to the proposed allocation) 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 are

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<sup>21</sup> 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

<sup>22</sup> LUC (August 2018) Greater Manchester Landscape Character and Sensitivity Assessment

<sup>23</sup> Salford City Council (September 2007) Landscape Character Assessment

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 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 following: the retention of the rural character of the area; the retention and conservation of existing 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 Greater Manchester Ecology Unit (GMEU) conducted a walkover habitat survey of the site in 2017<sup>24</sup>. The site is mostly arable, with a former golf course occupying the southern portion of the site. The northern part of the site included a significant area of grassland. There are also smaller areas of woodland, grassland and wetlands. The findings from the GMEU survey echoed those of Salford's 2008 habitat survey<sup>25</sup>. The woodland, grassland and ponds may be priority habitats (subject to further survey). There are hedgerows running through and around the site in a number of places, particularly in the northern part of the site. These may be a priority habitat at a national level (subject to further survey).
- 16.2. The above issues are addressed within the allocation policy, which requires the incorporation of high levels of landscaping and the retention or replacement of existing woodland, hedgerows and ponds where practicable. It also requires a minimum 10% net gain in biodiversity overall.
- 16.3. The entire site is within the Great Manchester Wetlands Nature Improvement Area and apart from a small strip alongside the A57 the site is also within the Carbon Landscape HLF Landscape Partnership area. 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. Specific concerns relating to peat on this site are discussed further in the "ground conditions" and "green infrastructure" sections above.
- 16.4. The wider Chat Moss area, including the fields within the allocation, are 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. Green infrastructure within the site is therefore likely to be of limited benefit to farmland birds. A requirement has been added to the policy on GMEU's recommendation such that development must be supported by breeding and winter bird surveys to

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<sup>24</sup> Greater Manchester Ecology Unit (December 2017 – Revision 1) Ecological Appraisal: Barton Moss (Port Salford Expansion)

<sup>25</sup> Penny Anderson Associates (2008) Salford Extended Phase 1 Habitat Survey 2008

understand and minimise impacts on bird species, including consideration of potential compensation areas and the wider landscape.

- 16.5. Foxhill Glen Site of Biological Importance (SBI) is located close to the southern boundary of the site. The allocation policy includes a requirement for surrounding habitats, including Foxhill Glen SBI to be protected and enhanced. The justification for the policy also notes that Foxhill Glen is likely to be one of the priorities for any off-site nature conservation enhancements required to deliver a minimum 10% net gain in biodiversity. Other priorities for off-site nature conservation enhancements are named as remaining areas of Green Belt bordering the site and restoration of lowland raised bog and complementary habitats on Chat Moss.
- 16.6. 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 Assessment<sup>26</sup> 'screened in' this allocation for further assessment, stating that it is within 5km 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 sources of additional traffic past the Manchester Mosses SAC on the M62. Wording to this effect has been inserted into the allocation policy, requiring any planning applications involving a floorspace of 1,000 sqm and above 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 2017<sup>27</sup> and the site was 'screened in' for both the built heritage and the below ground remains.
- 18.2. With regards to the built heritage there were no designated or non-designated heritage assets within the site boundary; there were however both such assets within the surrounding vicinity of the site which required further consideration. There were three Grade II listed buildings located within Barton Aerodrome to the immediate south-east of the site, and a further three non-designated heritage assets to the north-east and north. It was considered that the existing neighbouring uses including the heliport buildings, the industrial units and the Barton Moss Children's Unit provided a good level of screening between the south western half of the site

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<sup>26</sup> GMEU (October 2020) Habitats Regulations Assessment of the Greater Manchester Spatial Framework

<sup>27</sup> This screening exercise was published in the following document: Salford City Council (February 2019) Heritage Assessment of site allocations

and the aerodrome and therefore the greatest impact would be from development of the north eastern half of the site.

- 18.3. It was considered that the development of the proposal site would result in less than substantial harm in NPPF terms to the significance of any of the adjacent heritage assets and including the non-designated Barton Aerodrome. However, there would be some less than substantial but moderate harm to the significance of Barton Aerodrome and the listed buildings located within it. On this basis it was appropriate for mitigation measures to be incorporated into the policy (see criteria 9i) and ii) of the policy).
- 18.4. The site was screened in for a further assessment of its archaeological value<sup>28</sup> and the assessment identified that the site does not contain any known remains of national importance that would merit preservation in-situ. However, it was considered that there is physical evidence of prehistoric activity to survive on the fringes of the mosses and for the areas of deeper peat to retain important palaeo-environmental evidence. It was recommended that a programme of trial trenching be undertaken to establish the presence or absence of any buried archaeological remains. It was also considered appropriate that further borehole samples be undertaken to retrieve palaeo-environmental evidence.

## **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 (NO<sub>2</sub>) 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 A57 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 (CO<sub>2</sub>) 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 Plan<sup>4</sup> 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 (NO<sub>2</sub>) emissions, the proposals may also impact Carbon Dioxide

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<sup>28</sup> GMAAS (November 2018) Greater Manchester Spatial Framework and Salford Local Plan. Archaeological Assessment: EC4/1 Port Salford expansion

emissions (CO<sub>2</sub>) due to fleet changes. The outcome of the Greater Manchester Clean Air Plan is that roadside Nitrogen Dioxide (NO<sub>2</sub>) 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 also 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 One of the key attributes of the allocation is its potential to move freight from the roads and move it more sustainably. The GMSF site allocation policy requires that the infrastructure associated with the permitted Port Salford scheme is completed and operational before the expansion is commenced (criteria 3). Criteria 6 and 7 of the GMSF site allocation policy also require that the development is designed to maximise the use of sustainable modes. 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 site is located between the M62 motorway and A57 and would therefore be subject to some traffic noise. The site is also affected by flight paths associated with the adjacent Barton Aerodrome.
- 20.2. The majority landowner has undertaken an initial noise review of the site which has been published alongside the 2020 GMSF for information<sup>29</sup>. This assessment is based on a wider site allocation which is being promoted by the landowner. The assessment suggests that the site could be developed for the proposed employment use, that existing noise levels (primarily driven by road traffic noise from the M62/A57) would generally be expected to be acceptable, and that noise generated by the development would not be anticipated to affect the established residential properties which are already exposed to noise levels from the local traffic networks. The Barton Moss Secure Centre is identified as a key consideration in the assessment, and so therefore criterion 19 of the GMSF site allocation policy requires that the development provides an appropriate buffer to this use.
- 20.3. The noise impacts would need to be considered at an early stage in the masterplanning process and detailed noise assessments would need to be submitted alongside any planning application.

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<sup>29</sup> Cundall (March 2019) Strategic Environmental Noise Review

# Section D – Social

## 21. Education

- 21.1. Given that the allocation is for employment uses, there are no education requirements / mitigation arising from it.

## 22. Health Impact Assessment

- 22.1. Given that the allocation is for employment uses, no site specific health provision/mitigation is required as a result of the proposed development.

# 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 districts<sup>30</sup>. The assessment for the proposed Port Salford extension allocation shows that before the costs of local and strategic transport interventions are taken into account the proposed development would be viable<sup>31</sup>. However, costs associated with the necessary transport interventions required to mitigate the impact of development are considerable meaning the development would become unviable without any additional funding being secured to deliver the interventions. In relation to this finding, paragraph 19.1.17 of the site Locality Assessment<sup>32</sup> notes that:

“Further work should be undertaken to assess the allocation in greater detail with a more comprehensive and scheme-specific evidence base established, taking into account the unique nature of the development. The assessment should determine the level of infrastructure required to deliver the allocation and mitigate subsequent impact on the local and strategic highway network appropriately, as well as considering possible impacts on other GMSF allocations. This work should be coordinated with partners such as Highways England who are leading a study into the operation of the Strategic Road Network within Manchester’s North West Quadrant, running in parallel with GMSF and has strong geographical connections to the Port Salford study area”.

- 23.2. Given the need to undertake further work there is the potential for the costs of required transport interventions to change from that assumed within the viability assessment, which would therefore have implications for the overall viability of the site.

## 24. Phasing

- 24.1 The allocation policy requires new and expanded infrastructure. In particular development is not to be commenced until the rail link, highway improvements, canal berths and container terminal associated with the permitted Port Salford scheme to the south of the A57 have been completed and are operational and there is a clear commitment to the ongoing maintenance and full operation of this transport infrastructure (criterion 3). There is also a requirement that necessary highway improvements of a strategic and local nature are delivered (criterion 3). The city council has been involved in ongoing discussions with the landowner over the provision of new infrastructure to deliver the site.
- 24.2 The site is considered by the city council to be deliverable over the medium to long term. Although it is likely that the phasing of the site would be demand-led, it has been estimated by the city council that floorspace on the site could be delivered

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<sup>30</sup> Three Dragons et al (October 2020) Greater Manchester Spatial Framework. Stage 2 Allocated sites viability report

<sup>31</sup> A summary of the interventions required to enable the allocation to come forward are set out in section 16 of the Locality Assessment that has been prepared for the site.

<sup>32</sup> Systra (November 2020) Transport Locality Assessments. Introductory note and assessments – Salford Allocations

between 2020/31 and 2033/34 at an average annual rate of 50,000sqm per annum, and at 60,000sqm per annum between 2034/35 and 2035/36.

## **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 clearly respond to the requirements of the allocation policy, including:

- Being designed to form part of an integrated facility with the Port Salford site to the south of the A57 and associated infrastructure (criterion 4)
- Providing high quality walking and cycling routes from across the site to the bus stops on the A57 and the wider pedestrian and cycling network (criterion 6)
- Maximising links to existing public transport services and support new routes as appropriate, including accommodating a potential extension of the Trafford Park Metrolink line to serve Port Salford (criterion 7)
- Designing and landscaping the development to minimise any adverse impacts on the setting of Barton Aerodrome and the listed buildings within it (criterion 9, point i)
- Incorporating high levels of landscaping, including the retention or replacement of existing woodland, hedgerows and ponds where practicable, so as to minimise the visual impact on the wider landscape (including on the remaining Green Belt separating the site from Irlam), achieving a minimum 10% net gain in biodiversity and mitigating the environmental impacts of development including noise (criterion 11)
- Protecting and enhancing surrounding habitats, including the Foxhill Glen Site of Biological Importance (criterion 14)
- Protecting the quality of watercourses through and around the site (criterion 18)
- Providing an appropriate buffer to the Barton Moss Secure Care Centre on Barton Moss Road (criterion 19)

### *Illustrative masterplan*

25.3. An illustrative masterplan has been prepared by the landowner and is set out below. This was submitted by the landowner in their representations to the Revised Draft GMSF. Note that this shows the permitted Port Salford development to the south of the A57 Liverpool Road, and also the land proposed for allocation in the GMSF as part of Port Salford extension. Note that the map also includes additional land to the north of the A57 / south west of the map. This land is being promoted by the landowner for additional employment floorspace, although this was not supported by the city council through the Revised Draft GMSF, or through the 2020 GMSF.



25.4. As can be seen above, the illustrative masterplan prepared by the landowner provides an indicative layout of the development, including:

- The location of proposed buildings
- transport infrastructure (including a safeguarded route for Metrolink and a new M62-A57 link road)
- Primary roads and service yards / car parking
- A red diesel route
- Green space and infrastructure
- Proposed water bodies and wetlands and potential SuDS attenuation and swales
- Proposed pedestrian routes and linkages
- The existing overhead power line which is to be retained as part of the proposed development.

25.5. The illustrative masterplan appears to respond to many of the allocation policy requirements and shows that at a high-level the site is deliverable for new housing. Notwithstanding this, the above masterplan should be treated as purely indicative as to how the site may be developed at this stage, given that there is a requirement to prepare a masterplan in consultation with the local community and other stakeholders which has to be considered acceptable by the city council (under criterion 1 of the policy). In addition, the masterplan proposes a different boundary to that put forward by the city council through the allocation policy, whilst further work is needed relating any M62 to A57 link road.

### *Allocation boundary*

- 25.6. The city council does not consider it to be appropriate to amend the boundary of the allocation as suggested by the landowner. The boundary proposed in the 2020 GMSF maintains a significant area of open land, separating the existing residential area of Irlam from the development proposed. Retained as Green Belt, the area of open land would help to prevent the further coalescence of Eccles and Irlam. On this basis the Port Salford extension GMSF allocation remains for 320,000 sqm (i.e. what Peel refer to as option A).

# Section F – Conclusion

## 26. The Integrated Assessment

- 26.1. The potential impacts identified are largely positive other than in respect of impacts relating to the development of greenfield land in agricultural use. There are also negative impacts identified in relation to flood risk, although only 2% of the site is within a flood risk zone.
- 26.2. 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 boundary has been subject to a minor amendment since the Revised Draft GMSF was published in 2019 to remove existing dwellings and adjoining land along Barton Moss Road.
- 27.2. 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, updates to transport evidence and the findings of the Habitats Regulations Assessment. The changes made have clarified issues in relation to access, compensation for the loss of the golf course, and requirements in relation to project specific Habitats Regulation Assessment.
- 27.3. The revised policy is included in appendix 1.

## 28. Conclusion

- 28.1. The 108.6 hectare allocation has been identified to capitalise on tri-modal freight handling infrastructure to be delivered as part of the permitted Port Salford to the south of the A57. Port Salford has been identified as a key asset for Greater Manchester, distinguishing it from its competitors and its extension; as proposed through this allocation it has the potential to support more sustainable freight movements and attract investment into the Greater Manchester conurbation.
- 28.2. It is proposed that the site could accommodate 320,000sqm of employment floorspace, with a strong focus on logistics activities but also incorporating high quality manufacturing floorspace.
- 28.3. Various technical assessments have been undertaken in support of the site and there are a number of constraints identified that would need to be considered in the site's development and in the main these can be overcome and are reflected in the site allocation policy requirements.
- 28.4. Whilst also addressed at a high level within the allocation policy, the potential impacts on the transport network, and required infrastructure improvements to address them, remains an outstanding issue. Further clarification in this regard would

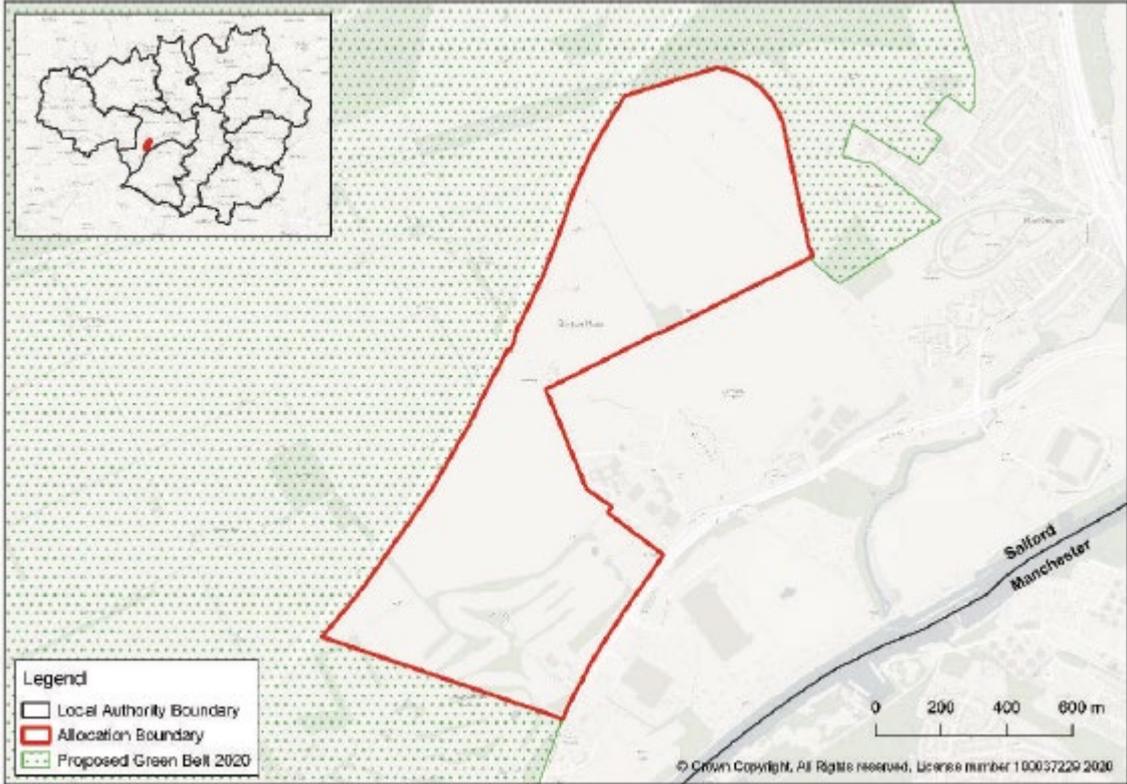
also have implications for the site viability assessment undertaken to date. Work is nevertheless continuing in this area with a view to having addressed these outstanding issues in advance of the Examination in Public.

# Section G – Appendices

## Appendix 1 – Policy wording for Port Salford expansion allocation (in the 2020 Publication GMSF)

### Policy GM Allocation 30

#### Port Salford extension



Picture 11.41 GMA 30 Port Salford Extension

A major expansion of Port Salford accommodating around 320,000 sqm of employment floorspace will be delivered to the north and west of Barton Aerodrome, taking advantage of the new port facilities, rail link and highway improvements that will have been completed as part of the early phases of Port Salford. This will provide one of the most well-connected and market-attractive industrial and warehousing locations in the country, with a strong focus on logistics activities but also incorporating high quality manufacturing floorspace.

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;
2. Involve high levels of community engagement, including through regular liaison meetings convened by the landowner and/or developers;
3. Not be commenced until the rail link, highway improvements, canal berths and container terminal associated with the permitted Port Salford scheme to the

- south of the A57 have been completed and are operational and there is a clear commitment to the ongoing maintenance and full operation of this transport infrastructure;
4. Be designed to form part of an integrated facility with the Port Salford site to the south of the A57 and associated infrastructure, encouraging and enabling all occupiers to utilise the rail and water connections for freight movement;
  5. Deliver necessary highway improvements of a strategic and local nature to cater for the additional traffic created by the expansion of Port Salford in a way that is compatible with any proposals for the enhancement of the wider motorway network and ensures the safe and efficient operation of the local road network;
  6. Provide high quality walking and cycling routes from across the site to the bus stops on the A57 and the wider pedestrian and cycling network including Port Salford Greenway;
  7. Maximise links to existing public transport services and support new routes and enhanced services as appropriate, including accommodating a potential extension of the Trafford Park Metrolink line to serve Port Salford;
  8. Protect the full functioning and operational safety of Barton Aerodrome;
  9. Conserve and where appropriate enhance, the significance of surrounding designated and non-designated heritage assets, including by:
    - i. Designing and landscaping the development to minimise any adverse impacts on the setting of Barton Aerodrome and the listed buildings within it; and
    - ii. Where harm to Barton Aerodrome and any heritage asset within it is justified, opportunities shall be sought to better reveal the significance of the heritage asset, securing repairs to them, improving public access to them and/or providing publicly accessible information about them.
  10. Justify and provide full compensation for the loss of the golf course in accordance with paragraph 97 of the NPPF (February 2019) or any subsequent revision of national planning policy;
  11. Incorporate high levels of landscaping, including the retention or replacement of existing woodland, hedgerows and ponds where practicable, so as to minimise the visual impact on the wider landscape (including on the remaining Green Belt separating the site from Irlam), achieve a minimum 10% net gain in biodiversity and mitigate the environmental impacts of development including noise;
  12. Support the objectives for the Great Manchester Wetlands Nature Improvement Area and avoid harm to protected species;
  13. 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 is possible into the wider landscape;
  14. Protect and enhance surrounding habitats, including the Foxhill Glen Site of Biological Importance;
  15. Be supported by a project specific Habitats Regulation Assessment for any planning applications involving a floorspace of 1,000 sqm and above;
  16. Mitigate the risk of surface water and groundwater flood risk, incorporating green sustainable drainage systems as part of the landscaping of the site;

17. **Minimise the loss of the carbon storage function of the peat and avoid any adverse impacts on the hydrology of surrounding areas of peat/mossland, whilst ensuring that there is no potential for future problems of land stability or subsidence;**
18. **Protect the quality of watercourses through and around the site;**
19. **Provide an appropriate buffer to the Barton Moss Secure Care Centre on Barton Moss Road, to protect the privacy and amenity of residents and staff;**
20. **Implement an agreed strategy for dealing with its local air quality impacts;**
21. **Give positive consideration to the incorporation of renewable and low carbon energy infrastructure, including the potential for solar panels on buildings; and**
22. **Employ methods throughout the construction process that will ensure the potential for archaeology is investigated and any finds safeguarded and properly recorded.**

11.278 The combination of excellent water, rail and road access, including direct shipping links to the post-panamax facility at the Port of Liverpool, will make Port Salford one of the most attractive locations in the country for industrial and warehousing development. An initial phase of development to the south of the A57 will provide around 150,000 sqm of primarily warehousing floorspace in total. Enabling its expansion to the north of the A57 to provide an additional 320,000 sqm of floorspace will help to significantly boost the competitiveness of Greater Manchester, offering the type of site that can compete with locations internationally for investment. The transport connections mean that the location is particularly attractive for logistics activities, but high quality manufacturing could also be provided in order to diversify the employment and investment opportunities in this part of Greater Manchester. Much of the site is grade 1 agricultural land, but the unique economic opportunity provided by the location is considered to outweigh the loss of the land's farming potential.

11.279 One of the key attributes of Port Salford is its potential to remove freight from roads and move it more sustainably by rail and water, and it will be vital that any development of the site takes advantage of this by utilising the infrastructure delivered as part of the permitted scheme. Nevertheless, the expansion of Port Salford will generate significant additional traffic and highway improvements to cater for these demands should be delivered as part of the site's development. The ongoing North West Quadrant Study, commissioned by Highways England, is investigating the options for broader motorway network improvements in this area, and it will be important to coordinate the development of Port Salford with any resulting proposals.

11.280 The retention of the Green Belt to the west and east of the site will help to prevent the coalescence of Irlam and Eccles. It will be important to make positive use of this Green Belt, including by expanding the facilities at Brookhouse Playing Fields to the east, and there may be opportunities to retain/reconfigure the former golf course to the west of the site. Even with the retention of part of the Green Belt, the scale of the development is likely to have a significant visual impact, and it will be very important for it to be integrated into the landscape as far as possible, particularly through the provision of high quality green infrastructure.

11.281 Barton Aerodrome (City Airport and Heliport) to the south of the site is an important facility for Greater Manchester, as well as being a significant heritage asset. The expansion of Port Salford will need to be designed so that it does not adversely impact on its successful functioning, taking into account any safeguarding

requirements for flight paths, and ensure that any harm to the setting of the heritage assets is minimised. In particular, careful consideration will need to be given to the siting and orientation of units, the choice and colour of materials, and the landscaping scheme adopted.

- 11.282 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 include the enhancement of Foxhill Glen Site of Biological Importance, ecological enhancements to remaining areas of Green Belt to the site's south western and north eastern boundaries and the restoration of lowland raised bog and complementary habitats in Chat Moss to the north. Wider ecological surveys, including water vole, brown hare, great crested newts and birds, will be required prior to any development. For any planning applications within the boundary of the allocation involving a floorspace of over 1,000 sqm, 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.
- 11.283 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.