

Publication Salford Local Plan: Development Management Policies and Designations (SLP:DMP)

Statement of the main issues raised in the representations to the SLP:DMP (January 2020)

January 2021

1. This statement is published alongside an Addendum to the Publication Salford Local Plan Development Management Policies and Designations (SLP:DMP). The Addendum to the SLP:DMP has been published in two parts and relates to Main Modifications, and Additional Modifications (February 2020).
2. It provides a summary of the main issues raised by respondents to the SLP:DMP (January 2020) and the city council's response to these issues. It is produced in accordance with the requirements of paragraph 3.49 of Salford City Council's Statement of Community Involvement (October 2020) which states that:

“Following each formal stage of consultation a schedule of responses will be produced and this will be published at the next stage of the document's production. This schedule of responses will outline the council's response to the key issues raised in the representations received. It will set out how the document has been changed to reflect the comments received, or where no change has been made, the reasons for this.”
3. A schedule of responses to the Publication SLP:DMP has been published separately which refers to this statement of the main issues raised and the council's response to these issues, explaining that it has been published separately.
4. The main issues raised regarding the SLP:DMP are listed below, ordered to begin with overarching matters, followed by the order of the policies in the plan, and ends by summarising the main issues raised in respect of evidence base documents. The table which follows provides commentary in respect of each of these issues.
 - Overall approach to the plan
 - Carbon neutrality and net zero carbon targets
 - Social value and inclusion
 - Affordable housing
 - Salford Quays Town Centre
 - Electric vehicle charging points
 - District heating network
 - Heritage
 - West Salford Greenway
 - Local Green Space

- Biodiversity net gain
- Recreation
- Duncan Mathieson Playing Fields
- Swinton Park Golf Course
- Habitats Regulations Assessment
- Transport evidence base

Issues raised in representations to the SLP:DMP	Salford City Council response:
<p>Overall approach to the plan</p> <p>The Peel Group has raised issues with the overall approach to the plan and the principle of progressing it. They consider that the city council has two options:</p> <ul style="list-style-type: none"> • Withdraw the SLP:DMP and/or bring forward a revised version which solely covers policies concerning development management with the restrictive designation policies removed from the document; OR • Withdraw the SLP:DMP entirely and progress a single subservient plan that follows the GMSF. <p>The Peel Group also raised concerns regarding the sustainability appraisal of the Publication SLP:DMP including the scoring of individual policies within it, particularly in the absence of consideration of development needs/allocations. An addendum to the sustainability appraisal has been published alongside the proposed modifications which provides a more detailed explanation of the issues raised.</p>	<p>There is nothing in legislation or policy which prevents the council's approach. Including restrictive designations within the Publication SLP:DMP is considered to be acceptable, with the exception of the designation of Local Green Spaces within this document. The main modifications to the Publication SLP:DMP propose that the Local Green Space designations are removed from the Publication SLP:DMP and deferred to Part 2 of the Local Plan (The Core Strategy and allocations). All other designations are proposed to be retained in the Publication SLP:DMP.</p> <p>An addendum to the sustainability appraisal has been produced having regard to the comments received and the proposed modifications to the Publication SLP:DMP. This includes some modifications to the appraisal to address some of the issues raised by The Peel Group, including an assessment of a further alternative option (the SLP:DMP without designations) and a review of the scoring of individual policies. The sustainability appraisal addendum has been published alongside the proposed modifications.</p>

Issues raised in representations to the SLP:DMP	Salford City Council response:
<p>Carbon neutrality and net zero carbon targets</p> <p>The Peel Group states that no specific evidence base is provided to justify the 2028 and 2038 carbon neutral targets set out in the strategic objectives for the Local Plan and also policies CC1 (Climate change) and EG1 (Sustainable energy).</p> <p>The same developer further commented that the Council is relying on the adoption of the Greater Manchester Spatial Framework (GMSF) to justify the inclusion of the 2028 and 2038 targets and has not got a Salford specific evidence base. As a result, the developer considers this approach to be unsound and proposes that the Council must either wait for the GMSF to be found sound before implementing this policy target or develop an evidence base to justify its inclusion.</p>	<p>Strategic Objective 8 of the SLP:DMP is 'To minimise contributions to, and risks from, climate change'. Key target 8a is for all new development to be net zero carbon by 2028, working towards carbon neutrality by 2038.</p> <p>Justification for policies in Chapter 5 (Climate change) and Chapter 17 (Energy) is set out in the Renewable and low carbon energy opportunities background report (published January 2020). An additional background paper has now been produced setting out the reasoning and evidence base in support of the carbon targets that are set out in the SLP:DMP</p>
<p>Social value and inclusion</p> <p>Four developers made representations to policy F2 (Social Value and inclusion), three of which considered the policy in its current form to be unsound. Their concerns were regarding the requirement for all major developments to submit a social value strategy at the planning application stage.</p> <p>Whilst some support was offered to the principles of the policy, the respondents indicated that they require further guidance and clarity as to the information a social value strategy is expected to include and questioned how a social value strategy would be assessed, calling for more measurable criteria. They also considered that the implications of the policy should be tested to</p>	<p>Making Salford a more socially inclusive city is a key element of the city council's vision, reflecting its 'Great Eight' priorities. Delivering a fairer Salford is therefore central to everything that the Local Plan is trying to achieve, and it is considered necessary for new development to take all practical measures to maximise its contribution to social inclusion.</p> <p>Some modifications to policy F2 are proposed in response to these comments, as detailed in the Main Modifications document which forms part of the Addendum to the Publication SLP:DMP (February 2020). The modifications comprise some additional text to explain how the requirement will work in practice and that further guidance on delivering social value may</p>

Issues raised in representations to the SLP:DMP	Salford City Council response:
<p>show that its requirements will not have an adverse impact of the delivery on planned growth and questioned whether the requirement is justified and effective, in line with the requirements of paragraph 35 of the NPPF.</p>	<p>be developed through a supplementary planning document (SPD).</p> <p>A background paper has been produced alongside the SLP:DMP Addendum (February 2020), which provides a more detailed explanation.</p>
<p>Affordable housing</p> <p>Comments were received from a number of developers and landowners to express concern that the minimum citywide requirement for 20% affordable housing as set out in policy H4 of the SLP:DMP was not supported by the council's Assessment of Residential Viability (ARV) (which shows that some in some areas development is not viable with the provision of affordable housing at 20%).</p> <p>Comments were received from the development industry with regards to the assumptions set out in the Assessment of Residential Viability. Overall, the respondents considered that the assessment had overestimated viability, and that a number of assumptions were not justified.</p> <p>A Housing Consortium representing developers of accommodation for older people stated that the viability of such accommodation should be modelled separately from mainstream housing developments.</p>	<p>Having regard to the comments received, the city council commissioned Three Dragons to review and prepare an addendum to the council's ARV.</p> <p>The viability addendum demonstrates that the council's ARV provides a robust assessment of the overall viability of new residential development in Salford, including the requirement for up to 50% affordable housing in some instances (as required by policy H4 of the SLP:DMP). In addition, the addendum demonstrates that the requirements for 20% affordable housing in build to rent schemes and purpose built student accommodation are viable (as required by policies H7, and H5 respectively).</p> <p>However, it remains the case that a minimum 20% affordable housing requirement across the city is not supported by viability evidence in parts of the city, and for certain types of development (including sheltered housing which was modelled separately from mainstream housing developments).</p> <p>Although a minimum 20% affordable housing requirement is not supported by the ARV and the addendum prepared by Three Dragons, it is important to note that the assessment is the</p>

Issues raised in representations to the SLP:DMP	Salford City Council response:
	<p>starting point rather than the only determinant of the approach to affordable housing. The assessment is based on a range of assumptions that may vary on individual sites; viability will also be dependent on factors such as site specific characteristics, the funding model and tendering process for the development, and the market conditions at the time. In setting a minimum 20% requirement regard has also been had to need, including the significant number of households on the housing register, and also Fairness which is an overriding theme of the Local Plan.</p>
<p>Salford Quays Town Centre</p> <p>Comments were received noting that the text referring to Salford Quays should be amended to reflect the importance of meeting the needs of living, working and visiting populations given the diversity of the Salford Quays area.</p> <p>One developer expressed the view that the primary shopping area conflicted with the definition in the NPPF. In addition, there was no justification for the inclusion of MediaCityUK in the primary shopping area.</p> <p>Two developers commented that in order to create an area with a mix of uses and to generate activity, some retail and other main town centre uses should be allowed outside of the primary shopping area. The approach to identifying primary frontages was also disagreed with in one representation, as this would lead to an inflexible approach to the loss of shops.</p>	<p>Some modifications to policy TC2 (Development involving main town centre uses) are proposed in response to these comments, as detailed in the Main Modifications document which forms part of the Addendum to the Publication SLP:DMP (February 2020).</p> <p>No modifications have been made to policies in Chapter 12 in response to comments regarding amending the text referring to the role and function of Salford Quays This is considered to be already sufficiently covered in the chapter.</p> <p>There is considered to be sufficient justification for the extent of the Salford Quays primary shopping area and inclusion of MediaCityUK in the primary shopping area, details of which are set out in the Salford Quays town centre background report (published alongside the SLP:DMP in January 2020).</p> <p>Publication SLP:DMP policy TC2 directs A1 retail, leisure, food and drink uses to the primary shopping area in the first instance, and then if there are no suitable sites, the second preference is the potential extension to the primary shopping area, before</p>

Issues raised in representations to the SLP:DMP	Salford City Council response:
	<p>finally the rest of the town centre. Since most of these uses now fall within the new E use class, it seems logical to direct Class E uses to the Salford Quays primary shopping area in the first instance, along with leisure uses including cinemas, theatres, casinos, concert halls, bars and public houses. Given the breadth of the E Use Class, thoughts are that the primary shopping area may become full sooner than the approach taken in the Publication SLP:DMP, and prior to changes to the Use Class Order. For this reason, it is proposed that the potential extension to the primary shopping area should become part of the primary shopping area.</p> <p>Given that shops, services, restaurants, cafes and a range of leisure uses all now fall under the E use class, it is not thought justifiable to make a distinction between primary and secondary frontages in Chapter 12. For this reason, frontages are removed from the Policies Map. The removal of town centre frontages has implications for policy TC3 (Retail frontages, changes of use and redevelopments within designated centres), with parts of the policy now deleted/amended including the deletion of criterion A-D. This amendment also addresses concerns regarding the identification of primary frontages.</p> <p>To address the concern that shops and other main town centre uses should be allowed in the wider Salford Quays area, further text is added to policy TC2 setting out small scale A1 retail and food and drink uses will be supported in areas outside of the Salford Quays primary shopping area where they would: positively contribute to the vitality and viability of the town centre;</p>

Issues raised in representations to the SLP:DMP	Salford City Council response:
	and not detract from and negatively impact on, the successful functioning of the primary shopping area.
<p>Electric vehicle charging points</p> <p>A developer and the Homes Builders Federation questioned the energy infrastructure capacity associated with the electric vehicle charging points requirements in policy A10 (electric vehicle charging points) and requested flexibility in the event that electric charging points cannot be delivered on a particular site due to site specific considerations.</p> <p>The need for the policy was also questioned having regard to the proposed amendments to the building regulations to introduce requirements for the provision of electric vehicle charging points in residential and non-residential buildings.</p>	<p>With regards to energy infrastructure capacity, it is understood that Electricity North West Ltd (ENWL) assesses future needs and the ongoing capacity of the network on an ongoing basis. Engagement with local authorities will be important in forecasting and future planning and in Greater Manchester, ENWL receive information on new housing and commercial developments from local councils on a regular basis. Through policy A10, the SLP:DMP is clear about requirements for electric vehicle charging infrastructure within new development, and the expectation that the network of such points will be expanded. This will assist ENWL in considering the potential demands of vehicle charging as part of their future forecasting and planning.</p> <p>In response to the comments received, modifications are proposed to policy A10 to provide some guidance with regards to exemptions, to reflect the approach to exemptions in the proposed new part of the building regulations.</p> <p>With regards to the need for the policy, consultation on the proposal to create a new part to the building regulations ‘Electric vehicle chargepoints in residential and non-residential buildings’ was undertaken in July 2019. It is understood that the Department for Transport and the Office for Low Emission Vehicles are currently analysing the feedback from this consultation. See: https://www.gov.uk/government/consultations/electric-vehicle-</p>

Issues raised in representations to the SLP:DMP	Salford City Council response:
	<p data-bbox="1167 272 1980 344">chargepoints-in-residential-and-non-residential-buildings - webpage last visited on 16/12/2020.</p> <p data-bbox="1167 384 2033 564">As the amendments had not come into force at the time the SLP:DMP was published in January 2020 and have not since come into force, it is considered appropriate to retain the requirements for electric vehicle charging infrastructure within the plan</p>
<p data-bbox="203 608 573 639">District heating network</p> <p data-bbox="203 679 1137 975">Three developers made representations to policy EG2 (renewable and low carbon energy schemes). Comments made are also relevant to policies EG1 (Sustainable energy) and CC1 (Climate change). One developer offered support to district heat networks but noted that decentralised energy systems should not be fuelled by natural gas. It was further explained that air or ground source heating could be used and hydrogen to produce heat should also be encouraged. Changes to policy EG2 were then recommended.</p> <p data-bbox="203 1015 1122 1118">The same developer requested that policy EG1 should be added to, setting out within district heat network areas, waste heat from commercial and industrial processes should be re-used.</p> <p data-bbox="203 1158 1137 1337">Other comments included that additional information is needed in the policy setting out further detail on what connecting to a heat network would involve. Viability of connecting to a heat network or safeguarding space for future connection was also raised as a concern by two developers. Restricting consumer choice was also</p>	<p data-bbox="1167 608 2056 751">Some modifications to policy EG1 are proposed in response to these comments, as detailed in the Main Modifications document which forms part of the Addendum to the Publication SLP:DMP (February 2020).</p> <p data-bbox="1167 791 2056 1046">In response to the comment on district heating and allowing for the use of a range of heat sources, text has been added to policy EG1. This now explains that district heat networks and developments within the district heat network development areas which will connect into a heat network, or be designed to do so, should use or be adaptable, to use renewable or low carbon heat sources.</p> <p data-bbox="1167 1086 2074 1302">In response to the developer comment on waste heat, text has been added to policy EG1 setting out existing industrial and commercial processes that are located within district heat networks areas, and generate waste heat, will be encouraged to use that waste heat to contribute towards meeting local energy needs.</p>

Issues raised in representations to the SLP:DMP	Salford City Council response:
<p>considered to be a problem should new developments connect to a heat network.</p>	<p>No modifications have been made to policies EG1, EG2 or CC1 in response to comments regarding providing further detail in the policy, viability concerns and problems around restricting consumer choice. Sufficient detail is considered to be set out in policies EG1 and EG2 on the council's approach to district heat networks. In terms of viability, policy EG1 acknowledges that for some developments there may be more effective alternatives for minimising carbon emissions. It is also recognised that connection to district heat networks may sometimes be impracticable or financially unviable. The requirement to connect will also be waived where it can be demonstrated there are more effective alternatives for minimising carbon emissions.</p>
<p>Heritage</p> <p>Historic England considered that the wording of the policies needed to more accurately reflect the specific wording in the NPPF. They also considered that greater clarity was required in the policies in relation to the setting of a heritage asset, harm to a heritage asset and how it should be assessed, and also the approach to be taken towards heritage assets at risk including appropriate action available to the city council.</p> <p>Historic England also considered that the proposed monitoring indicators required additional clarification and accuracy, particularly in relation to designated heritage assets.</p> <p>One landowner wanted better consistency between the wording in paragraph 20.30 of the SLP:DMP and the wording in policy HE6</p>	<p>In response to the comments from Historic England modifications have been made to policies HE1, HE2 and HE4, and also each of the proposed three monitoring indicators. These modifications have been agreed with Historic England; a copy of a letter from Historic England to the city council is attached to this Statement at Annex A. The agreed changes are included in the Publication SLP:DMP Main Modifications document, which forms part of the Addendum to the Plan (February 2020).</p> <p>Main modifications to criterion B of policy HE6 have been made in response to the comments regarding the future restoration of the canal and towpath, and future development in the area.</p>

Issues raised in representations to the SLP:DMP	Salford City Council response:
<p>(Canals) in relation to future development and the future restoration of the Manchester Bolton and Bury canal and associated towpath.</p>	
<p>West Salford Greenway</p> <p>The Peel Group objected to the designation of West Salford Greenway under policy GI4 of the SLP:DMP. They commented that the designation is not based on an objective assessment, is not worthy of protection for planning reasons, and does not take into account development needs. They go on to state that by omitting any basis for weighing benefits of development within the Greenway, the Policy GI4 is inconsistent with the Framework's approach to the formulation of policy.</p>	<p>The Greenway is green infrastructure in its own right and so therefore is consistent with paragraph 20 of the NPPF which requires that strategic policies should make sufficient provision for the conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure (criterion d).</p> <p>A background report has been published which sets out the justification for policy GI4 of the SLP:DMP.</p>
<p>Local Green Space</p> <p>Policy GI5 of the SLP:DMP identified 10 sites as Local Green Space. The Peel Group stated that the proposed designation of a number of sites within the West Salford Greenway as Local Green Space is at odds with paragraphs 99 and 100 of the NPPF which must be met for sites to function, and therefore be designated as, Local Green Space. They further criticised the council's methodology for assessing whether sites qualify as Local Green Space, including relying on sites forming part of a larger tract of land, endurance beyond 2037, the value to local communities, and local significance.</p> <p>The Peel Group concluded that the designation of sites within the West Salford Greenway as Local Green Space is fundamentally</p>	<p>It is noted that paragraph 99 of the NPPF states that:</p> <p><u>"Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services."</u> (Emphasis added)</p> <p>This means that sites should not be designated as Local Green Spaces until the city's development needs (i.e. how much housing and employment is needed) are understood and it has been determined how this development can be accommodated (i.e. what is the spatial distribution strategy and which sites in the city are required to be allocated to accommodate this development).</p>

Issues raised in representations to the SLP:DMP	Salford City Council response:
<p>unsound, lacking in any evidential basis to support this designation and contrary to the NPPF. It should not be carried forward as part of the progression of the Local Plan</p> <p>An individual suggested an additional Local Green Space site (the former Swinton Wastewater Works site), whilst a landowner requested that Blackleach Country Park should not be designated as Local Green Space (under GI5/4) as part of it has development potential.</p>	<p>It is proposed that the Local Green Space designations are removed from Part 1 of the Local Plan (SLP:DMP) and deferred to Part 2; these sites would still be provided significant protection through other designations that are appropriate for Part 1 of the Local Plan. For example, a number of the Local Green Space sites form part of the West Salford Greenway which is designated under policy GI4 of the SLP: DMP. Other examples of protection include designations such as Nature Reserves, Sites of Biological Importance and recreation sites.</p> <p>Consideration will be given to the addition of sites not previously designated as Local Green Space in part 2 of the Local Plan (as well as those that were previously in part 1). Regard will need to be had to the criteria in paragraph 100 of the NPPF for when the designation can be used.</p>
<p>Biodiversity Net Gain</p> <p>A number of concerns were raised about the approach to biodiversity net gain in policy BG2. Firstly, developers and landowners questioned the impact on viability and deliverability of development. Specific concerns about viability were as follows:</p> <ul style="list-style-type: none"> • The new Defra metric is difficult to achieve and unrealistic, • Viability had not been fully considered in drafting the policy and • There was a lack of differentiation between employment and residential development. 	<p>The viability of introducing requirements relating to biodiversity net gain has been fully considered as part of the viability addendum report that has been produced by Three Dragons on behalf of the city council. This includes consideration of the impacts on the requirement for both residential and non-residential development.</p> <p>The introduction to the policy (paragraph 23.11) refers to developments being assessed against the most up to date Defra Metric or equivalent in order to assess current biodiversity value and demonstrate net gain. The Defra metric was prepared following Natural England working with Government and stakeholders to improve an earlier 2012 metric. It is considered to be an appropriate metric to use.</p>

Issues raised in representations to the SLP:DMP	Salford City Council response:
<p>In relation to environmental concerns, there were specific comments that the proposed approach failed to adequately address (i) trees, (ii) farmland birds and (iii) climate change.</p>	<p>In relation to the environmental concerns, these are considered to be adequately addressed within the policy and supporting text, and a more detailed explanation of this is provided within a Background Report on biodiversity net gain. This background report has been published alongside consultation on SLP:DMP Addendum.</p>
<p>Recreation</p> <p>Sport England raised concerns that amendments were required to policy R1 of the SLP: DMP as a standards based policy for outdoor sports would not comply with paragraph 96 of the National Planning Policy Framework.</p> <p>Sport England welcomed the inclusion of a separate policy (policy R5 of the SLP: DMP) covering the protection and enhancement of outdoor and indoor sports facilities but considered that further amendments were required to incorporate the additional contributions from new development to outdoor and indoor sport facilities within this policy.</p>	<p>Sport England and Salford City Council met to discuss the representations submitted by Sport England. As a result of these discussions modifications to policies R1, R3 and R5 of the SLP: DMP have been agreed. The agreed changes are included in the Main Modifications document which forms part of the Addendum to the SLP:DMP (February 2020).</p> <p>Sport England has provided a letter confirming that the agreed rewording of policies R1, R3 and R5 of the SLP: DMP is sufficient to alleviate previously raised concerns and wishes to withdraw their representations to the SLP:DMP. This letter is attached to this Statement at Annex B.</p>
<p>Duncan Matheson Playing Fields</p> <p>Sport England considered that further amendments were required to policy R5 of the SLP: DMP to ensure that potential enabling development at Duncan Matheson Playing Fields would comply with paragraph 97 of the NPPF, and exception policy E3 of Sport England’s Playing Fields Policy.</p>	<p>Sport England and Salford City Council met to discuss the representations submitted by Sport England. As a result of these discussions modifications to policy R5 of the SLP: DMP have been agreed. The agreed changes are included in the Main Modifications document which forms part of the Addendum to the SLP:DMP (February 2020).</p> <p>Sport England has provided a letter confirming that the agreed rewording of policy R5 of the SLP: DMP is sufficient to alleviate</p>

Issues raised in representations to the SLP:DMP	Salford City Council response:
<p>The owner of Duncan Matheson Playing Fields (Boys and Girls Clubs of Greater Manchester) considered that policy R5 of the SLP: DMP should not identify the site as a strategic hub of city-wide importance for outdoor sports (reference R5/5).</p> <p>Individual representations objected to any proposals involving the loss of Duncan Matheson Playing Fields as a result of built development.</p>	<p>previously raised concerns and wishes to withdraw their representations to the policy. This letter is attached to this Statement at Annex B.</p>
<p>Swinton Park Golf Course</p> <p>A significant number of representations were made to policies R1, R3 and R5 of the SLP:DMP in relation to the potential loss of Swinton Park Golf Club and Course as a result of its development for new housing. Requests were made that the site should be afforded protection through the Local Plan.</p>	<p>Policy R3 of the SLP:DMP provides the starting point that recreation land is protected from development for non-recreation uses. Policy R5 lists golf courses as one of the types of outdoor and indoor sports facilities that will be protected and enhanced.</p> <p>Any planning application coming forward for development on the site prior to adoption of the SLP:DMP would be considered on its own merits having regard to adopted planning policies in the Unitary Development Plan, primarily policy R1 which relates to the Protection of recreation land and facilities). Upon its adoption, the recreation protection of policies R3 and R5 would provide the starting point for any consideration of development proposals.</p> <p>Individual golf courses would not be applicable for either of the two designations that have been suggested in representation to the SLP:SMP for the reasons outlined below:</p> <ul style="list-style-type: none"> • Green infrastructure: The three strategic green infrastructure designations identified in the SLP:DMP (policy GI2 Chat Moss, policy GI3 Irwell Valley and policy GI4 West Salford

Issues raised in representations to the SLP:DMP	Salford City Council response:
	<p>Greenway) are of importance in a Greater Manchester context, as well as to neighbourhoods within Salford, for the wide range of functions that they provide. A golf course does not have the same role and function as these designations.</p> <ul style="list-style-type: none"> • Strategic hubs of citywide importance: The strategic hubs of citywide importance for outdoor sports as identified in policy R5 are multi-pitch sites that have been independently identified in Salford’s playing pitch strategy. The five key hubs listed in policy R5 are considered essential to outdoor provision for pitch sports. Golf courses are not considered to be of citywide importance.
<p>Habitats Regulations Assessment (HRA)</p> <p>Natural England expressed a number of concerns about the Habitats Regulations Assessment (HRA) of the Publication SLP:DMP.</p> <p>One relatively minor issue was that Natural England consider that the assessment of in-combination effects (section 8) should come before the Appropriate Assessment (section 7). This does not affect the content of the two sections.</p> <p>Natural England were concerned that the impacts of the area based policies (AP1 to AP5) needed to be considered in more detail.</p>	<p>Next time the Habitats Regulations Assessment is published, the assessment of in-combination effects will come before the Appropriate Assessment. At this point the HRA is not being re-published in full as an addendum report has been produced instead.</p> <p>The city council has engaged with Natural England regarding their concerns about the assessment of the area policies (AP1 to AP5) and policy EG2. The city council clarified with Natural England the nature of these policies, namely that they were criteria for managing development rather than promoting development). Natural England were satisfied with this clarification.</p> <p>A summary of the clarification provided by the city council to Natural England is set out within the HRA Addendum Report</p>

Issues raised in representations to the SLP:DMP	Salford City Council response:
<p>Finally, Natural England expressed concerns about policy EG2 due to potential impacts on the Manchester Mosses SAC from geothermal energy projects, should any come forward in the area.</p>	<p>that is published alongside the Publication SLP:DMP Addendum (which sets out main and additional modifications).</p>
<p>Transport evidence base</p> <p>Highways England raised concerns about the lack of a transport evidence base for the local plan and considered there to be insufficient evidence to determine what the impact to the strategic road network (SRN) may be. Their concerns were that there is a significant risk that the SRN will be unable to cope with the additional demand and that the transport impacts are not fully assessed as part of the development process. The comments noted that it is not sufficient to rely on the outcomes of ongoing or future studies such as the work being undertaken to support the GMSF and North West Quadrant Study.</p>	<p>No modifications are proposed in response to these comments.</p> <p>The scope of the SLP:DMP comprises development management policies and designations. It does not identify the scale of development or allocate sites for development; this will be addressed in the Greater Manchester Spatial Framework (GMSF) and part 2 of the Local Plan (Core Strategy and allocations).</p> <p>Highways England and Salford City Council met to discuss the representation submitted by Highways England. Subsequently, Highways England has submitted an addendum to their initial comments confirming that it has no issues regarding the plan in its current form with regard to its evidence base and is supportive of the plan's policies to encourage sustainable modes of transport. Highways England's addendum response can be viewed at Annex C of this Statement.</p>

ANNEX A – Correspondence with Historic England



Historic England

By email: Amelia.lucas@salford.gov.uk

Our ref:

Your ref:

Date: 15 September 2020

Dear Amelia,

Salford Local Plan SLP/DMP – Duty to Co-operate and Statement of Common Ground

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

Thank you for your email dated 15 September 2020 regarding the proposed final changes to the Salford Local Plan – SLP/DMP. As you are aware, Historic England is listed as one of the “prescribed” bodies relating to the Duty to Co-operate on the planning of sustainable development. Prescribed bodies are required to co-operate with local planning authorities constructively, actively, and on an ongoing basis in the preparation of development plans in relation to strategic matters.

As a statutory consultee, we consider that the Council has consulted fully with and, where appropriate, provided sufficient opportunities to engage with us at all stages in the preparation of the local plan. We are also satisfied that the Authority has taken proper account of our comments in formulating the amended document now under consideration.

We consider that the attached document (*Ref: Historic England_Salford CC - Proposed final changes to policies in SLIP-DMP –September 2020*) contains the changes agreed between Salford City Council and Historic England. These changes, including the rewording of Local Plan policies D8, HE1, HE2, HE4, Strategic Objective 10, monitoring indicators for heritage and the introductory boxes to Chapter 11 (Housing) and Chapter 20 (Heritage), appropriately deals with the concerns raised by Historic England.



Historic England, Suite 3.3, Canada House, 3 Chepstow Street, Manchester M1 5FW
Telephone 0161 242 1416 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



In view of the above, Historic England wishes to withdraw their objections to the Salford Local Plan –SLP/DMP

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely,

E. Hrycan

Emily Hrycan

Historic Environment Planning Adviser (North West)

Historic England

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Proposed final response of SCC to comments made by Historic England to the SLP:DMP Consultation

Page no.	Section/para	Sound/unsound	Comments	Suggested amendments by Historic England	Proposed response of SCC
25	Strategic objective 10	Unsound	<p>Whilst we welcome the key target of no net reduction of statutorily protected heritage assets, it would be preferable if the strategic objectives also included reference to heritage at risk. Salford has a number of assets on the Historic England Heritage at Risk Register and one of the key targets for the Council during the Plan Period should be the reduction in entries on the register. The Local Plan on page 192 (Para 20.33) in the monitoring section of the heritage chapter includes this as an indicator yet it is not reflected in the strategic objectives. For consistency and robustness reference should be included here.</p> <p>In addition it is unclear whether 'statutorily' designated heritage is referring to all types of heritage assets e.g. those that are designated and/or those included on the Council's local list.</p>	<p>An addition target be introduced:</p> <p><u>"A reduction on the number of assets on the Historic England Heritage at Risk Register".</u></p> <p>The Plan should be amended to ensure clarity on types of heritage assets.</p>	<p>The Strategic objectives identified in chapter 3 are considered to be central to achieving the plan's aims. Objective 10 focusses on delivering high quality new development and therefore it is not considered appropriate to include a target regarding the number of heritage assets at risk in this part of the plan.</p> <p>An indicator and target relating to heritage assets at risk is retained within chapter 20 (Heritage) of the plan. It is proposed that the target and indicator are amended to indicate that they relate to "designated" heritage assets to provide full clarity. It is proposed that the wording within target 10a within chapter 3 is amended in the same way for consistency across the document.</p>

Page no.	Section/para	Sound/unsound	Comments	Suggested amendments by Historic England	Proposed response of SCC
			In view of this and to provide clarity, it should be amended accordingly.		
75	Box	Unsound	<p>The NPPF recognises the importance of good design that responds to local character and distinctiveness. This not only creates places that are attractive and maintains a strong sense of place but it also retains and creates a sense of community, fostering pride, and identity. As well as contributing to health and well-being as well as better homes and places to live.</p> <p>In view of this, we would expect that the opening section of this chapter should include reference to this, as it would ensure that it would be in line with the NPPF and the rest of the Plan.</p>	<p>Bullet 4 should be amended to read:</p> <p>“Requiring new homes to meet good space standards, and be designed to adapt to changing needs <u>and to contribute to sustaining and enhancing local character and distinctiveness</u>”</p>	<p>Agreed.</p> <p>It is considered appropriate that the text is amended in accordance with HE’s suggested amendments to read as follows:</p> <p>“Requiring new homes to meet good space standards, be designed to adapt to changing needs <u>and to contribute to sustaining and enhancing local character and distinctiveness.</u>”</p>
177	Policy D8 Alterations & extensions Bullet 4	Unsound	Any proposals that affect a heritage asset will be required to sustain and enhance the significance of the asset in line with the requirements of the NPPF. It is unclear why there is separate guidance in this policy from that in the heritage chapter of the Plan.	Delete Bullet 4 from the Plan.	<p>Comments noted.</p> <p>The Design chapter relates to all new built development, with policy D8 relating specifically to alterations and extensions to existing built development. This is also applicable to existing heritage assets but has been identified specifically under policy D8 (criterion 4) for full clarification and the avoidance of doubt.</p>

Page no.	Section/para	Sound/unsound	Comments	Suggested amendments by Historic England	Proposed response of SCC
			<p>Whilst it is acknowledged that the Plan is read as a whole; the inclusion of Bullet 4 could provide confusion to applicants applying for planning permission. In particular, as it only asks for the preservation of its significance. In addition, the setting of a heritage asset is part of its significance and therefore, any proposals which harm this are affecting their significance.</p> <p>Therefore, it is suggested for clarity and to align with the requirements of the NPPF that Bullet 4 is deleted.</p>		<p>It is proposed that the wording of policy D8 criterion 4 is amended to read as follows:</p> <p>“Where a heritage asset would be affected, either directly or in terms of its setting, <u>preserve sustain and where appropriate, enhance</u> the significance of that asset and its setting.”</p>
180	Box Bullet 1	Sound subject to minor amendment	<p>The NPPF requires plan policies to conserve and where appropriate enhance the historic environment rather than ‘just’ protecting and enhancing. To strengthen the Plan and to ensure that it is in line with the requirements of the NPPF, Bullet 1 should be amended to include reference to ‘<i>conserving</i>’.</p>	<p>Bullet 1 should be amended to include reference to “<i>conserving</i>”.</p>	<p>Agreed. Opening bullet to be amended to read as follows:</p> <p>“Protecting Conserving and enhancing the city’s heritage.....”</p>
182	Policy HE1 Para 1	Unsound	<p>This paragraph needs to be amended to better reflect the requirements of the NPPF.</p>	<p>Paragraph 1 should be amended to read:</p>	<p>Agreed.</p> <p>Wording in the first sentence of the first paragraph</p>

Page no.	Section/para	Sound/unsound	Comments	Suggested amendments by Historic England	Proposed response of SCC
			Enhancements of the significance of a heritage asset should only be undertaken where it is <i>appropriate</i> following a thorough understanding of its <i>significance</i> and the impact of any proposals on it. It should not be encouraged at all times, as it might not always be appropriate.	Salford's heritage assets and their setting will be conserved and their <u>where appropriate</u> , enhanced ment encouraged , ensuring that they continue to make a positive contribution to the character and identity of the city's and its neighbourhoods.	is proposed to be amended in accordance with HE's suggested amendments to read as follows: "Salford's heritage assets and their setting will be conserved and <u>where appropriate</u> their enhanced ment encouraged , ensuring that they continue to make a positive contribution to the character and identity of the city's <u>and its</u> neighbourhoods.
183	Para 3	Unsound	This is not in accordance with the requirements of the NPPF as the policy as drafted suggests that harm is acceptable. The NPPF is quite clear that any harm to a heritage asset should be avoided. Therefore, the policy should be rewritten.	Harm to the <u>significance of a</u> heritage asset <u>should be avoided</u> shall be minimised <u>as far as practicable</u> . The acceptability of any such harm will be determined in accordance with the requirements of the National Planning Policy Framework.	Agreed. Wording of paragraph 3 of the policy is proposed to be amended in accordance with HE's suggested amendments. The word "such" in relation to "such harm" has been deleted as it is considered unnecessary. The sentence is now to read as follows: "Harm to <u>the significance of a</u> heritage assets shall be minimised as far as practicable should be avoided. The acceptability of any such harm will be determined in accordance with the requirements of the National Planning Policy Framework.
183	Para 4	Unsound	There is nothing in national policy which refers to the concept of harm being offset by compensation. This paragraph is contrary to national policy and will result in harm to heritage assets	The paragraph should be amended to read: "Where harm to heritage assets is unavoidable <u>justified (in line with the tests in the NPPF)</u> ,	The second sentence of the third paragraph of the policy clearly states that the acceptability of any harm will be determined in accordance with the requirements of the NPPF. However, it is acknowledged that the inclusion of "justified" with the removal of the wording "compensated for" would further reinforce the requirements of the

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			<p>being allowed rather than justified using the tests in the NPPF.</p> <p>In addition, harm to heritage assets is that which is necessary to achieve public benefits not whether or not it is unavoidable and compensated for. Therefore, this paragraph should be amended in line with the requirements of national policy.</p>	<p>appropriate compensation shall be provided, opportunities should be sought to better for example by to better revealing the significance of the heritage assets, securing repairs to them, improving public access...</p>	<p>NPPF with regards to harm.</p> <p>Having regard to the above, it is proposed to amend the first sentence of the fourth paragraph to read as follows:</p> <p>“Where harm to heritage assets is <u>justified</u>, <u>opportunities shall be sought to better</u> unavoidable, appropriate compensation shall be provided, for example by better revealing the significance of the heritage assets, securing repairs to them, improving public access to them, and providing publicly accessible information about them.”</p>
186	<p>Policy HE2</p> <p>Bullet 1</p>		<p>Enhancement to heritage assets may not always be appropriate. To ensure that it is in line with the requirements of the NPPF this should be amended.</p> <p>In addition, the supporting text to the policy contained in Para 20.13 to 20.15 talks about the historic environment, conservation areas, identity, character, design and significance yet this bullet only refers to character.</p> <p>In addition reference is made to places yet the policy refers to areas. For consistency this</p>	<p>Bullet 1 should be amended to include:</p> <ul style="list-style-type: none"> To broaden the elements of the place which should be conserved other than just ‘character’ etc. <p>For consistency places or areas should be used rather than both.</p>	<p>Comments noted.</p> <p>Bullet 1) is broad in nature but it is considered that the accompanying introductory paragraphs provide further clarification of the purpose of the policy, especially when read alongside the specified approach of each area in A – F of the policy.</p> <p>The word “environment” is a broad term and would include all the elements identified in the introductory paragraphs and is indeed broader than “places”. Therefore, it is proposed that Bullet 1 is amended to read as follows:</p> <p>“Protect, conserve and <u>where appropriate</u>, enhance the historic character of places environment;”</p>

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			needs to be amended. The bullet should be expanded to ensure all elements are included.		
189	Policy HE4	Unsound	<p>There are a number of assets on the Heritage at Risk Register as well as conservation areas within Salford. The intention of any assets on the heritage at risk register should be to secure their long term future, through finding viable uses for them and to ensure that they are maintained and secured to prevent them from decaying further.</p> <p>As drafted the policy does not provide an overarching starting point for any applications affecting heritage assets.</p> <p><u>Paragraph 1</u> In addition, developers are not expected to address the 'source' of the heritage at risk. It is unclear what this means, and it could result in works to elements that are not directly related to the asset, such as for example access improvements to the</p>	<p><u>Proposals which safeguard and secure the long term future of heritage assets at risk through finding viable uses for them and ensuring that they are maintained and secured to prevent further decay will be supported.</u></p> <p><u>The owners and occupiers of heritage assets that are at risk should seek to address the source of the risk at the earliest opportunity, in a manner consistent with the long term protection of the heritage asset. They are strongly encouraged to investigate grant funding opportunities.</u></p>	<p>Agreed.</p> <p>It is proposed to amend the first paragraph of the policy in accordance with HE's suggested amendments to read as follows:</p> <p>"The owners and occupiers of heritage assets that are at risk should seek to address the source of the risk at the earliest opportunity, in a manner consistent with the long term protection of the heritage asset. Proposals which safeguard and secure the long term future of heritage assets at risk through finding viable uses for them and ensuring that they are maintained and secured to prevent further decay will be supported. They owners are strongly encouraged to investigate grant funding opportunities."</p>

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			highway, rather than stabilising a structure or making it watertight.		
189	Policy HE4	Unsound	<u>Paragraph 2</u> It is important that the policy reflects the requirements of the 1990 Act. Whilst a range of actions might be appropriate, in terms of heritage, reference should also be made to Repairs Notices (which can lead to CPO) and not Dangerous Structure Notices.	Where appropriate, a range of actions may be taken to secure the future of the heritage asset at risk which includes appropriate restoration or maintenance of heritage assets, including enforcement action against unauthorised changes, compulsory purchase orders, urgent works notices and Repairs Notices dangerous structure orders.	Noted. Repairs notices should be referred to for completeness. The Act doesn't specifically state that Dangerous Structure Notices should not be used but states that before taking any steps with a view to the making of a dangerous structure order, action under S47 and 48 or Section 54 of the Act should be considered instead of serving a Dangerous Structure Notice. Therefore, it is proposed that the wording of the second paragraph is amended to incorporate the majority of HE's proposed changes to read as follows: "Where appropriate, a range of actions may be taken to secure the appropriate restoration or maintenance of heritage assets <u>at risk</u> , including enforcement action, <u>which includes</u> compulsory purchase orders, urgent works notices, <u>repair notices</u> and dangerous structure notices <u>orders.</u> "
189	Policy HE4	Unsound	<u>Paragraph 3</u> <i>This paragraph should be deleted as it is not in accordance with national policy and legislation.</i>	When assessing a development proposal, the reduction or removal of risk to a heritage	Noted. National Planning Practice Guidance on Heritage states the following ¹ :

¹ Paragraph: 016 Reference ID: 18a-016-20190723: "When is securing a heritage asset's optimum viable use appropriate in planning terms?"

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				<p>asset will be considered a public benefit that counts in favour of the proposal.</p>	<p>“Where a heritage asset is capable of having a use, then securing its optimum viable use should be taken into account in assessing the public benefits of a proposed development.”</p> <p>Therefore, it is proposed to retain the wording of paragraph 3 of policy HE4. However, it has subsequently been considered that this paragraph is more appropriate and relevant to policy HE3 and has therefore been incorporated into policy HE3 as a new third paragraph.</p>
190	Para 20.33	Unsound	<p>Indicator 1: We welcome the inclusion of an indicator which seeks to reduce the number of assets on the Heritage at Risk Register. We have made comments on page 25 (Strategic Objective 10), where this target should be included within this.</p> <p>Indicator 2: The target is to maintain the number of heritage assets lost or de-designated. Without the baseline position, this has no number (target) to which it is working to and therefore maintenance might be a reduction of 1,2,5,6 etc. So rather than maintain, the target should be ‘zero’.</p>	<p>The table should be amended as follows:</p> <p>Indicator 1: no change Indicator 2: target should be changed to ‘zero’. Indicator 3: clarity on what this is meant to refer to designated and/or non-designated heritage assets.</p>	<p>Agreed.</p> <p>It is proposed that indicator 1 should be amended in accordance with HE’s suggested amendments to read as follows:</p> <p>“<u>Designated</u> heritage assets identified as ‘at risk’ on the Historic England Heritage at Risk Register” to provide clarity.</p> <p>In accordance with comments made against Strategic objective 10 in Chapter 3, it is also proposed to amend the target to read “Reduction in the number of <u>designated heritage</u> assets at risk”.</p> <p>Indicator 2: It is considered that changing the target to “zero” would provide better clarity that there should be no losses. Indicator to be amended in accordance with HE’s suggested amendments to read “zero”</p> <p>Indicator 3 – it is proposed that this is amended to</p>

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			Indicator 3: In line with the comments on page 25, the indicator should be amended to provide clarity of the type of assets this refers.		read as follows: "Number of statutorily designated <u>protected</u> heritage assets"

ANNEX B - Correspondence with Sport England

Steve Davey
Principal Planner
Environment & Climate Change
PLACE Directorate
Salford Civic Centre
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Manchester M27 5AW

26 June 2020

Dear Steve,

Re: Salford Local Plan

Sport England has worked with the Council over the last two years to ensure the Local Plan is sound. The attached document contains the changes agreed between the Council and Sport England with respect to policies R1, R3 and R5.

Local Plan Policies R1, R3 and R5

Sport England is a statutory consultee on all planning applications affecting playing fields and there was a need to ensure the emerging Local Plan policy and associated evidence base did not compromise that position. Sport England's Playing Fields Policy¹ reflects the content of paragraph 97 of the National Planning Policy Framework (NPPF). Sport England assesses relevant planning applications against the criteria of paragraph 97 of NPPF and the exceptions to the Sport England policy. It was essential that the wording of any sport related Local Plan policy seeks to reflect local circumstances whilst conforming to the national position. Sport England is satisfied that policies R1, R3 and R5 achieves that. Sport England provides an advisory non-statutory role to Local Authorities in the determination of applications affecting sports facilities that fall outside of the playing field definition. Paragraph 97 of NPPF, in addition to relevant Local Plan policies, assists that determination. Local Plan policy R5 seeks to protect, enhance and provide both indoor and outdoor sports facilities. It was felt necessary to integrate all sports into one policy to reflect the similarity in the role and function each type plays in the community.

¹ https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy

Evidence Base

Paragraph 96 of NPPF requires the Council to base local plan policies on robust and up to date assessments of need and opportunities. The relevant assessments that identify the existing and future demand and supply of indoor and outdoor sports facilities are the Playing Pitch Strategy (PPS) and Indoor Sport and Leisure Facilities Strategy.

Sport England and the main pitch sport national governing bodies of sport (NGB) have assisted the Council with the preparation of the PPS and subsequent reviews and continue to do so to ensure it remains up to date and robust. The methodology used is set out in Sport England's PPS guidance (October 2013). The PPS provides a site specific action plan that can be used in tandem with Local Plan policies R3 and R5, in particular, to help determine planning applications.

The Indoor Sport and Leisure Facilities Strategy has also been prepared and follows Sport England's 'Assessing Needs and Opportunities Guidance' (2014). The Strategy was used to inform an Improvement Strategy. The two documents can be used in tandem with Local Plan policy R3 and R5 to help determine planning applications.

Sport England will continue to work with the Council to ensure both sport evidence base documents remain up to date and robust throughout the lifetime of the Local Plan.

Conclusion

Sport England consider the rewording of Local Plan Policies R1, R3 and R5, is sufficient to alleviate Sport England's previously raised concerns. In light of the above, Sport England wish to withdraw the representations made to the Local Plan on 23rd April 2020.

If you have any queries in relation to these comments, please do not hesitate to contact the undersigned.

Yours sincerely



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CHAPTER 24 RECREATION

Creating a fairer Salford by:

- Ensuring that all residents have good access to a wide range of recreation facilities and opportunities
- Addressing shortfalls in recreation provision that currently affect communities in some parts of the city
- Enabling everyone to live active and healthier lives
- Improving access from all parts of the city to the countryside

24.1 The provision of a broad range of high quality, accessible recreation facilities is a major contributor to quality of life, and will help to ensure that Salford is an attractive place to live, work and visit. Such provision includes parks and country parks, children's play areas, sports pitches and facilities, allotments, natural greenspaces, nature reserves, and public amenity spaces. These are supported by other initiatives that will deliver major recreation benefits such as Irwell River Park.

24.2 Recreation is vital to supporting the physical and mental health of residents, enabling people to lead more active lives. It also makes an important wider contribution to the social health of the city, for example providing positive leisure and learning opportunities for young people. Other parts of the plan will also help to improve recreation provision across Salford, including by protecting and enhancing strategic green infrastructure at Chat Moss, the Irwell Valley and the West Salford Greenway (policies GI2-4), supporting the completion of Irwell River Park (chapter 8), supporting the recreational use of the basins at Salford Quays (policy AP2), improving waterside walkways and cycleways (policy D9), and protecting the city's canals (policy HE6).

Local recreation standards

24.3 Local recreation standards have been developed to help ensure that all residents have good access to a range of recreation opportunities which are able to meet a variety of different needs and demands. Many of the standards have been used in Salford for several years or more, and are derived from national standards produced by organisations such as the National Playing Fields Association and Natural England. The standard relating to woodland is based on the Woodland Trust's Woodland Access Standard. It is recognised that land availability will act as a constraint on the achievement of some of these standards in parts of the city, but it will be important to work towards them as far as practicable, particularly given the importance of local recreation facilities in helping to address the poor average health levels in Salford.

~~24.4 The demand for sports pitches is influenced significantly by population levels, the number of teams and leagues, changes in the popularity of different sports, and the availability of facilities elsewhere. The local recreation standard for sports pitches will therefore be kept under review, with reference to the recommendations of the latest playing pitch assessment and is likely to evolve over the course of the plan period.~~

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24.524.4 It will be important that all new residential developments support the achievement of the recreation standards wherever possible, given the additional demand that they will create. Their contribution will be calculated based on the proposed number of dwellings (which equates to the number of households that could be accommodated) and the number of bed spaces (which equates to the population that could be accommodated) that the development would create, as well as the type of dwellings where appropriate. On-site provision will often be the most suitable form for such contributions, so as to maximise accessibility to occupants of the new housing, although this may not be practicable or deliver the most effective outcomes in some cases. In particular, it will be appropriate within areas of greenspace deficiency for larger developments to incorporate substantial public open space that can act as a focal point for the development as well as improving access to recreation opportunities. In parts of the city where it will not be feasible to achieve specific recreation standards, developments will be required to make enhanced contributions to other types of recreation.

Policy R1 Recreation standards

New residential development shall contribute to the achievement of all of the following recreation standards, and the management and maintenance of any facilities provided or improved for at least a 20 year period, proportionate to the additional demand that they would be expected to generate:

Size-based standards

- 1) **A minimum of 0.45 hectares of publicly accessible amenity space per 1,000 residents**
- 2) **A minimum of 0.4 hectares of ~~other~~ informal outdoor sports facilities (both adult and youth) per 1,000 residents**
- 3) **A minimum of 1 hectare of Local Nature Reserve per 1,000 residents**
- 4) **A minimum of 5,000m² (or 0.50 hectares) of allotments per 1,000 households, with each new plot being 125m² in size to enable as many residents as possible to take on an allotment**

Distance-based standards

- 5) **All households to be within 500 metres walking distance of a Local Equipped Area for Play (LEAP)**
- 6) **All households to be within 1,000 metres walking distance of a Neighbourhood Equipped Area for Play (NEAP)**

- 7) All households to be within 1,200 metres walking distance of a Neighbourhood Park
- 8) All households to be within 3,200 metres walking distance of a District Park
- 9) All households to be within 500 metres walking distance of a publicly accessible Local Natural Greenspace of at least 1 hectare in size
- 10) All households to be within 2,000 metres walking distance of a publicly accessible Strategic Natural Greenspace of at least 20 hectares in size
- 11) All households to be within 4,000 metres walking distance of a publicly accessible woodland of at least 20 hectares in size

The requirements for formal indoor and outdoor sport provision are contained within policy R5. Other standards

- ~~12) Development to secure the level of playing pitch provision and associated changing rooms required to meet the scale of additional demand it is likely to generate, based on Salford's latest playing pitch assessment and calculated using the Sport England Playing Pitch Calculator~~
- ~~13) All households to have good access to a full range of other indoor and outdoor recreation facilities with sufficient capacity to meet demand~~

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Facilities will only be counted as helping to meet these standards where they are of sufficient quality to properly fulfil their intended function and meet the level of demand placed on them.

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The contribution made by new residential developments to the achievement of these standards shall be in accordance with the following order of preference, and may include both new facilities and the improvement or refurbishment of existing facilities:

- A) On-site provision where this is practicable and would be the most effective way of meeting the needs generated by the development
- B) Off-site provision and/or a financial contribution to off-site provision

Where on-site provision is being made to meet standard 5 and 6 above, this shall achieve a minimum of 0.25 hectares of equipped children's playspace per 1,000 bed spaces ~~(where the number of bed spaces in each dwelling is equal to the number of bedrooms plus one).~~

All facilities shall be designed to serve other green infrastructure functions (see Policy G11) wherever possible, linking into the wider green infrastructure network.

Scale of contribution

It is recognised that there may be situations where it is unrealistic or disproportionate for a development to contribute to the full achievement of all of the standards in this policy, particularly where most of the standards are not currently met and there is limited scope for on-site recreation provision. In these circumstances, it will be considered that this policy has been met where the combined financial value of recreation improvements that will be funded

by the development (including financial contributions and the capital cost of on-site provision and off-site provision in the local area, but excluding compensation for any loss of recreation function resulting from the development) meet or exceed the following levels:

- a) For all recreation standards **other than standard 12** (at 2019/20 financial year prices):
 - i) For houses, £1,408 per bed space;
 - ii) For apartments and other forms of residential accommodation not falling within the definition of a house, £965 per bed space; and
- b) ~~The playing pitch contribution as detailed in policy R5. For standard 12 relating to To secure the level of playing pitch provision and associated changing rooms required to meet the scale of additional demand from development a contribution based on Salford's up to date Playing Pitch Strategy and calculated using the Sport England Playing Pitch Calculator will be required. playing pitches and changing rooms, the scale of contribution identified using the Sport England Playing Pitch Calculator. For houses and apartments this is £348 per bed space (at 2019/20 financial year prices) with the cost to be reviewed regularly in line with updates to the Playing Pitch Strategy and Facilities Costs contained within the Playing Pitch Calculator.~~

The levels in point (a) will increase annually in line with the Retail Prices Index (all items). When there is evidence which indicates that open space provision costs have changed, the contributions per bed space above will be adjusted accordingly. The most up-to-date published cost at the point of an application's determination will be used.

Definitions

'Informal outdoor sports facilities (both adult and youth)' includes but is not limited to: skateboarding and wheeled-activity facilities; mini-football (hard standing surfaces only); jogging/fitness circuits; multi-use games areas (MUGA); outdoor gyms; basketball courts (outdoor); and youth shelters.

'House' is defined in policy H1.

'Bed space' is defined as the number of bedrooms within a dwelling plus one.

Protection of recreation facilities

24.624.5 If the quantity, quality and accessibility of recreation provision in Salford are to be maintained and enhanced, then it will be necessary to strictly control developments that would affect existing recreation land and facilities. The incremental loss of existing recreation sites to other uses has the potential to compromise the overall Local Plan approach to improving recreation provision in support of social, economic and environmental objectives. The presumption will therefore be that an existing recreation site

should be retained in recreation use unless there is clear evidence that its loss would not harm access to high quality recreation facilities. Where the loss of a recreation use is considered acceptable, it will be important that appropriate compensation is provided so as to ensure there is no overall reduction in recreation opportunities in the local area.

Policy R3 Protection of recreation land and facilities

The development of existing recreation land or facilities for non-recreation purposes will only be permitted where:

- 1) It is ancillary to the recreation use and does not reduce the overall recreation function of the site;
- 2) Replacement recreation provision of at least the same quantity, quality, accessibility to its catchment population, community benefit and management level is made in a suitable location;
- 3) It has been clearly demonstrated that the site is surplus to recreational requirements and is not capable of helping to meet any of Salford's recreation standards; or
- 4) The site has been allocated for alternative purposes in the development plan, and development will deliver a net improvement in the city's recreation resources.

Wherever practicable, replacement provision shall be made directly by the developer and shall be available for use before the existing recreation facility is lost. The payment of a financial contribution to the city council for replacement provision may be acceptable in other circumstances.

This policy applies to all existing sites and facilities that have a recreation use or value, irrespective of whether they are owned or managed by the public, private or voluntary sectors.

Where the loss of a disused or lapsed playing field site is proposed the following priority order of options will be used in addition to the recommendations set out in Salford's latest playing pitch strategy:

A) Explore the feasibility of bringing the site back into use which may show either:

- i) The site can be brought back into sustainable use where funding is available and use is secured by the council and the relevant sport national governing body and/or community groups; or**
- ii) The site is not in a sustainable location and in which case no amount of money will make it desirable. In this case option B) or C) will be applicable.**

B) The site could become another type of recreation facility or greenspace to meet a need identified in Salford's latest open space evidence base;
or

C) Redevelop the site for an alternative use with an appropriate proportion of the capital receipt to be invested in existing recreation facilities in the locality.

Definitions

'Playing field' is the whole of a site which includes at least one playing pitch.

'Playing pitch' is a delineated area, together with any run-off area, of 0.2 hectares or more, and which is used for any of the sports covered by current legislation¹.

A 'disused' playing field site has formerly accommodated playing pitches within the previous five years that are not now being used at all and are not available for community hire.

A 'lapsed' playing field site is one where the last use was more than five years ago.

¹ HM Government (2015) *The Town and Country Planning (Development Management Procedure) (England) Order 2015: schedule 5, paragraph 2a, interpretation of table k (ii).*

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Outdoor and indoor sports facilities

24.724.6 The provision of a broad range of high quality, accessible outdoor and indoor sports facilities will complement other recreation facilities available in the city. These facilities will support the needs of each sport and club in Salford, ensuring that provision is sufficient and flexible to deal with current and projected increases in demand. These sports facilities will encourage active lifestyles to provide significant benefits for the health and wellbeing of people visiting, working and living in the city.

24.824.7 Demand for sports facilities is expected to rise as the population of the city increases, therefore it will be important that all new residential developments ~~support contribute to adding capacity in existing sports facilities or creation of new the achievement of the recreation standards for outdoor sports (Policy R1) and enhancements to indoor facilities wherever possible,~~ given the additional demand that these developments will create. ~~The F~~five key hubs ~~are listed in policy R5 are considered~~ essential to outdoor sports provision, ~~and f~~Further enhancements to ~~these and other existing multi-pitch sites~~ will be necessary to ensure that they meet Salford's needs.

24.924.8 Independent assessments are updated regularly on behalf of the city council for all sports facilities. The Salford playing pitch assessment reviews the supply and quality of sports pitches against the needs of each sport and club. This links to a strategy and action plan that makes key recommendations and prioritises specific changes and enhancements to individual sports pitch sites. A separate indoor sport and leisure needs assessment and strategy focuses on a wide range of indoor facilities.

Policy R5 Outdoor and indoor sports facilities

A comprehensive range of outdoor and indoor sports facilities will be protected and enhanced across Salford, in accordance with ~~policies R1 and policy~~R3, including ~~but not limited to~~:

- A) Grass sports pitches, for ~~example for~~ football, rugby league, rugby union, and cricket ~~as defined by current legislation~~²;
- B) Artificial ~~surfaces~~ for all ~~pitch sports pitches including hockey~~;
- C) Athletics facilities;
- D) Tennis Courts;
- E) Bowling Greens;
- F) Golf Courses
- G) Sports halls;
- H) Swimming pools;
- I) Fitness centres and gyms; and

² HM Government (2015) *The Town and Country Planning (Development Management Procedure) (England) Order 2015: schedule 5, paragraph 2a, interpretation of table k (ii)*.

- J) Other specialist indoor facilities including those for bowls, combat sports, gymnastics, squash and tennis.

To secure the level of playing pitch provision and associated changing rooms required to meet the scale of additional demand generated from development, contributions will be based on Salford's up to date Playing Pitch Strategy and calculated using the Sport England Playing Pitch Calculator. For houses and apartments this is £348 per bed space (at 2019/20 financial year prices) with the cost to be reviewed regularly in line with updates to the Playing Pitch Strategy and Facilities Costs contained within the Playing Pitch Calculator.

The most up-to-date published cost at the point of an application's determination will be used.

The following sites are designated as strategic hubs of city-wide importance for outdoor sports, as shown on the Policies Map, and their enhancement will be supported:

- 1) Salford Sports Village in Lower Kersal
- 2) Old Racecourse Playing Fields
- 3) Brookhouse Playing Fields
- 4) Bolton Road Playing Fields
- 5) Duncan Matheson Playing Fields

In the case of Duncan Matheson Playing Fields, a small amount of enabling development will be considered on areas that are not functional playing field to cross-fund the improvement of the site for recreation purposes. will be considered. This shall be consistent with its designation as a strategic hub for outdoor sports if adequate alternative funding cannot be secured and in line with the requirements of policy R3.

Definitions

Non-functional playing field is land incapable of forming part of a playing pitch for competitive sport or training use, for example due to steep slopes or other site-specific ground conditions.

Monitoring

[24.1024.9](#) The main indicators that will be used to monitor this chapter are:

Indicator	Baseline position ³	Target
Area of publicly accessible amenity space per 1,000 residents	1.01 hectares (224.8%)	Increase (2019-2037)

³ Salford City Council (January 2019) *Open Space chapter of Salford Infrastructure Delivery Plan (2017/18)*

Indicator	Baseline position ³	Target
Area of other informal outdoor sports facilities ⁴ per 1,000 residents	0.09 hectares (22.5%)	Increase (2019-2037)
Area of Local Nature Reserve per 1,000 residents	145.4 hectares (62.1%)	Increase (2019-2037)
Number of allotments per 1,000 households	5.4 (27%)	Increase (2019-2037)
Proportion of households within 500 metres walking distance of a Local Equipped Area for Play	44.8%	Increase (2019-2037)
Proportion of households within 1,000 metres walking distance of a Neighbourhood Equipped Area for Play	89.9%	Increase (2019-2037)
Proportion of households within 1,200 metres walking distance of a Neighbourhood Park	76.2%	Increase (2019-2037)
Proportion of households within 3,200 metres walking distance of a District Park	96.1%	Increase (2019-2037)
Proportion of households within 500 metres walking distance of a publicly accessible Local Natural Greenspace of at least 1 hectare in size	53.0%	Increase (2019-2037)
Proportion of households within 2,000 metres walking distance of a publicly accessible Strategic Natural Greenspace of at least 20 hectares in size	48.0%	Increase (2019-2037)
Proportion of households within 4,000 metres walking distance of a publicly accessible woodland of at least 20 hectares in size	61.4%	Increase (2019-2037)

⁴ 'Informal outdoor sports facilities' includes but is not limited to: skateboarding and wheeled-activity facilities; mini-football (hard standing surfaces only); jogging/fitness circuits; multi-use games areas (MUGA); outdoor gyms; basketball courts (outdoor); and youth shelters.

Indicator	Baseline position ³	Target
<u>The number of match equivalent session shortfalls as expressed in the most recent Salford Playing Pitch Strategy combined across all pitch sports</u>	<u>100⁵</u>	<u>Decrease (2019-2037)</u>

⁵ Knight, Kavanagh & Page (August 2015, updated February 2018) *Salford Community Leisure (Salford City Council) Playing Pitch Strategy Assessment Report*

ANNEX C – CORRESPONDENCE WITH HIGHWAYS ENGLAND

Our ref:
Your ref:

Publication Local Plan
Spatial Planning
Salford Civic Centre
Chorley Road
Swinton
Salford
M27 5BY

Adam Johnson
Highways England
Piccadilly Gate
Store Street
Manchester
M1 2WD

Direct Line: 0300 470 4881

28 May 2020

Dear Sir / Madam

Publication Salford Local Plan: Development Management Policies and Designations – Highways England Addendum Response

I write regarding Highways England's response to the Publication Salford Local Plan ('the Plan'), dated 19 March 2020. This addendum reply follows a meeting held between representatives of Highways England and Salford City Council on 21 May 2020.

Our previous concerns centred around the lack of transport evidence to enable Highways England to come to an informed decision about whether we could support the Plan in its current form. Following discussions, we acknowledge that this 'Part 1' of the Local Plan is written to establish the Council's proposed policies and does not seek to allocate any specific sites for future development. 'Part 2' of the Local Plan, when drafted, will set out the Council's vision for the future by allocating specific sites for development, though this will likely not come forward until the Greater Manchester Spatial Framework has been published. As such, I am pleased to confirm that Highways England has no issue with the Plan in its current form with regard to its transport evidence base.

Going forward, we will look to work with Salford City Council as you develop the transport evidence required for 'Part 2'. This will enable us to ensure that the Strategic Road Network is not severely impacted by its proposed allocations and can act as an enabler of growth within Salford.

We are also supportive of the Plan's policies where they seek to encourage sustainable methods of transport, including walking, cycling and public transport, enhancing accessibility and reducing congestion. This is an approach supported by Highways England, as it has the potential to reduce highway traffic impacts associated with development.

I trust this clarifies Highways England's position regarding the Local Plan, and we look forward to working with you as it progresses.

Yours faithfully



Adam Johnson
Asset Development Team
Email: Adam.Johnson@highwaysengland.co.uk