

Publication Salford Local Plan: Development Management Policies and Designations

Habitat Regulations Assessment (HRA) of the Impact on European Protected Sites Addendum

January 2021

This Addendum has been prepared by Salford City Council with advice from the Greater Manchester Ecology Unit

1. Introduction

- 1.1 The [Publication Salford Local Plan Development Management Policies and Designations \(SLP:DMP\)](#) and its accompanying [Habitats Regulations Assessment](#) were published in January 2020. Comments were invited on the plan and the various supporting documents over a six-week period until Friday 20 March 2020.
- 1.2 Whilst it was anticipated that the Publication SLP:DMP would be the version of the plan that the city council would submit to the Secretary of State for examination, it is considered that a small number of modifications to some of the policies are required. As a result of this, an Addendum to the SLP:DMP has been published; this is in two parts and relates to Main Modifications, and Additional Modifications (February 2020).
- 1.3 Comments are being invited on all of the proposed amendments to the SLP:DMP between 5 February and 19 March 2021.
- 1.4 This document forms an addendum to the December 2019 Habitats Regulations Assessment (HRA) which was published alongside the Publication SLP:DMP in January 2020.
- 1.5 Comments were received from Natural England to the December 2020 HRA and some amendments to the assessment are proposed in response to these which are detailed in this document. Whilst some of the amendments proposed to the Publication SLP:DMP are considered to be 'main' in nature, the vast majority of the HRA is considered to remain relevant. Given this, the purpose of this addendum is to only provide an additional assessment of any differing impacts to those originally identified as a result of proposed modifications to the Publication SLP:DMP.
- 1.6 This addendum will be submitted to the Secretary of State alongside the full Habitats Regulations Assessment. For details of the European Sites under consideration, please refer to the December 2019 HRA.

2. Methodology

- 2.1. A number of non-main modifications to the Publication SLP:DMP (known as 'Additional Modifications') have been proposed, which make only minor changes to the policy, often to correct typographical errors or to clarify aspects of a policy. Where these minor modifications have been made to policies which were previously screened out in the HRA, it is not considered proportionate to document the further assessment of each of those minor modifications. A document showing all of the Additional modifications has been published separately.
- 2.2. Table 1 below provides commentary on policies which:
 - a) Are subject to main modifications;
 - b) Were previously screened in as part of the initial screening of the HRA and are subject to either main or additional modifications; or
 - c) Are subject to an Additional modification which nonetheless is considered to require consideration
- 2.3. The only policy in category c) is policy AP2 (Salford Quays) where reassurance was sought from GMEU that the policy type was unaffected by the change. As Table 1 shows, no policies have been screened in for further consideration following the proposed amendments to the Local Plan.
- 2.4. In addition to the policies within the SLP:DMP, the policies map, and a number of Figures (as a consequence to changes to the policies map) are proposed for modification. One of the modifications is to the Port Salford Rail link (policy EC2/2), which cuts across a corner of Chat Moss. This modification is to only show a westwards connection onto the existing railway line; the Publication SLP:DMP showed an eastwards and westwards connection. This is not a change to the policy, rather an amendment to the line of a protective designation to reflect ongoing discussions taking place through the development management/legal processes. It is not therefore assessed as part of this addendum report.
- 2.5. The 2019 HRA noted that given the limited scope of the Publication SLP:DMP, the only issue needing consideration of potential "in combination" effects is recreation pressure on the Manchester Mosses Special Area of Conservation. The assessment looked at relevant plans from neighbouring areas and concluded that in all cases recreational pressure would have no likely significant effect on any European sites (see the reasons outlined in section 7 of the HRA). Given the limited nature of the modifications proposed, the conclusions from December 2019 remain relevant, as is outlined with reference to the relevant policies in Table 1 below. There is therefore no further need for an in-combination assessment as part of this addendum report.

Table 1: Screening summary of impacts of proposed modifications to the Publication SLP:DMP on the Natura 2000 Network of European Sites.

SLP:DMP Policy	Brief Policy Description including any modifications	Policy Type¹	Possible Impacts on European Site²	Original Screening Outcome³	Any Likely Significant Effect from Modification
F2	<p>Social value and inclusion</p> <p>Proposed main modifications include reference to the city council's Great Eight priorities and reference to the development of a social value framework.</p>	A	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy	Screened Out	None – policy type is unchanged
AP1	<p>City Centre Salford</p> <p>Details for managing development within City Centre Salford.</p> <p>The boundary of City Centre Salford is proposed for expansion (minor in nature) but given the policy sets criteria for managing development rather than allocating or promoting development, there is no need to assess this further.</p> <p>Another proposed modification involves additional text relating to the Manchester, Bolton and Bury Canal which also has no likely significant effect on European sites.</p>	A/B	<p>In isolation this policy does not represent a risk of negative impacts as it does not specify office floorspace or numbers of dwellings. It merely outlines guidelines on developments within City Centre Salford.</p> <p>No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.</p>	Screened Out	None – policy type is unchanged
AP2	<p>Salford Quays</p>	A/B	In isolation this policy does not represent a risk of negative impacts as it does not specify office floorspace or numbers of dwellings	Screened Out	None – policy type is unchanged

¹ See Annex 1 of this addendum report

² Taken from Table 5.1 of the December 2019 HRA

³ As per Table 5.1 of the December 2019 HRA

SLP:DMP Policy	Brief Policy Description including any modifications	Policy Type ¹	Possible Impacts on European Site ²	Original Screening Outcome ³	Any Likely Significant Effect from Modification
	Proposed modifications include a reference to enhancing opportunities to interchange at Eccles as a gateway to the area.		but merely outlines guidelines on developments within Salford Quays. No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.		
CT1	<p>Tourism Development</p> <p>Development shall protect and enhance the tourism function of the key tourism locations in Salford.</p> <p>All proposed modifications are minor in nature and relate to updating boundaries and adding cross references to maintain/improve consistency with other parts of the plan.</p>	J	<p>The operation of this policy may raise the profile of Chat Moss as a potential tourism location.</p> <p>Although it is considered that any subsequent increase in recreation pressure on Chat Moss is not likely to have a significant effect on European sites alone, it is possible that in combination this could occur.</p>	Screened In	<p>None – the proposed changes are all minor and do not alter the effect of the policy.</p> <p>Although this policy was initially screened in for potential impacts on Manchester Mosses SAC, a more detailed consideration of recreation and access issues led to the conclusion that there would be no effect on the integrity of any European site.</p>
TC1	<p>Network of Designated Centres</p> <p>Identifies a network of centres within Salford that will be protected and enhanced.</p> <p>Modifications to the policy are proposed in response to changes in national policy. These have no implications for designated sites given the nature of this policy.</p>	G	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out	None

SLP:DMP Policy	Brief Policy Description including any modifications	Policy Type ¹	Possible Impacts on European Site ²	Original Screening Outcome ³	Any Likely Significant Effect from Modification
TC2	<p>Development involving main town centre uses</p> <p>Defines the sequential approach for main town centre uses and thresholds for requiring impact assessment for any development proposal outside a designated centre.</p> <p>Modifications to the policy are proposed in response to changes in national policy. These have no implications for designated sites given the nature of this policy.</p>	B	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out	None
TC3	<p>Retail frontages, changes of use and redevelopments within designated centres</p> <p>The role of Salford's centres in meeting a wide range of local needs will be protected and enhanced.</p> <p>Modifications to the policy are proposed in response to changes in national policy. These have no implications for designated sites given the nature of this policy.</p>	G	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out	None
TC4	<p>Food and drink uses within designated centres</p> <p>The sustainable growth of the daytime and evening leisure-based economy within Salford's designated centres will be encouraged.</p> <p>Modifications to the policy are proposed in response to changes in national policy. These have no implications for designated sites given the nature of this policy.</p>	G	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.	Screened Out	None

SLP:DMP Policy	Brief Policy Description including any modifications	Policy Type ¹	Possible Impacts on European Site ²	Original Screening Outcome ³	Any Likely Significant Effect from Modification
TC5	<p>Community facilities</p> <p>New policy which sets out circumstances in which permission would be granted for new community facilities, and criteria for when development resulting in the loss of a premises or currently last in use as a community facility will be permitted.</p> <p>Such new facilities would generally be small scale to serve existing communities and would need to be consistent with other policies in the plan.</p>	B	N/A – new policy	N/A – new policy	No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.
HE1 to HE6	<p>Heritage Chapter</p> <p>There are a number of modifications to the wording of the heritage policies.</p> <p>The modifications have been mainly classed as main modifications because they relate to issues of soundness raised by a statutory consultee (Historic England). However, due to the nature of these policies there is no conceivable effect on designated sites and there is no need to consider the modifications further.</p> <p>Another proposed modification involves additional text relating to the Manchester, Bolton and Bury Canal in policy HE6 which also has no likely significant effect on European sites.</p>	G	No Likely Significant Effect on any European Site is anticipated from the operation of these Policies.	Screened Out	None
GB2	<p>Soils and agricultural land</p> <p>Policy safeguarding soils and agricultural land.</p>	D	No Likely Significant Effect on any European Site is anticipated from the operation of these Policies.	Screened Out	None

SLP:DMP Policy	Brief Policy Description including any modifications	Policy Type ¹	Possible Impacts on European Site ²	Original Screening Outcome ³	Any Likely Significant Effect from Modification
	The modification includes restriction on new turf operations and extensions to existing production, particularly on Chat Moss.				
GI2	<p>Chat Moss</p> <p>Policy sets out how Chat Moss will be protected and enhanced.</p> <p>The proposed modifications put more emphasis on reducing carbon emissions from the area and include a statement that new turf operations or extensions to existing turf production will not be permitted.</p>	D	<p>Potential for positive impacts on European Sites through the restoration of lowland raised bog and creation/restoration of complementary wetland habitats.</p> <p>[Policy includes] safeguards to avoid increased recreational pressure on European Sites and protection of hydrology of Chat Moss.</p>	Screened Out	None
GI5	<p>Local Green Space</p> <p>This policy has been deleted</p>	G	No likely significant effect on any European site is anticipated from the operation of this policy.	Screened Out	<p>None – as this policy had no significant effect and was not being used to safeguard designated sites.</p> <p>The deletion of the policy is not an issue for the HRA.</p>
R1 and R3	<p>Recreation standards</p> <p>Recreation land and facilities</p> <p>As with the heritage policies, there are a number of proposed modifications to the wording of these policies.</p>	G	No Likely Significant Effect on any European Site is anticipated from the operation of these Policies.	Screened Out	None

SLP:DMP Policy	Brief Policy Description including any modifications	Policy Type ¹	Possible Impacts on European Site ²	Original Screening Outcome ³	Any Likely Significant Effect from Modification
	<p>The modifications have been classed as main modifications because they relate to issues of soundness raised by a statutory consultee (Sport England). However, due to the nature of these policies there is no conceivable effect on designated sites and there is no need to consider the modifications further.</p>				
R4	<p>Strategic recreation routes</p> <p>A network of high quality strategic recreation routes extending through the city and into surrounding districts will be protected and enhanced. Identifies existing strategic recreation routes.</p> <p>The provision of further strategic recreation routes in addition to these will be sought particularly where they would improve links to and through specific locations including Chat Moss.</p>	I	<p>Initial screening assessment in December 2019 found potential for negative impacts from increased recreation pressure on Chat Moss and European sites.</p>	Screened In	<p>None – the changes are all minor and do not alter the effect of the policy.</p> <p>Although this policy was initially screened in for potential impacts on Manchester Mosses SAC, a more detailed consideration of recreation and access issues led to the conclusion that there would be no effect on the integrity of any European site.</p>
R5	<p>Outdoor and indoor sports facilities</p> <p>As with policies R1 and R3, there are a number of modifications to this policy.</p> <p>These modifications have been classed as main modifications because they relate to issues of soundness raised by a statutory consultee (Sport England). However, due to the nature of these policies there is no conceivable effect on</p>	G	<p>No Likely Significant Effect on any European Site is anticipated from the operation of this Policy.</p>	Screened Out	None

SLP:DMP Policy	Brief Policy Description including any modifications	Policy Type ¹	Possible Impacts on European Site ²	Original Screening Outcome ³	Any Likely Significant Effect from Modification
	designated sites and there is no need to consider the modifications further.				

3. Clarification in response to comments received at Publication stage

- 3.1 The only comments received to the HRA at the Publication stage were from Natural England. Natural's England's representation to the HRA and the city council's response to it are published elsewhere alongside the proposed modifications consultation⁴. There were a couple of issues which Natural England asked the city council to clarify and those are addressed here.

Area Based Policies AP1-AP5

- 3.2 As set out in Table 5.1 of the HRA, policies AP1 to AP5 are not policies which promote development; rather they provide details for managing development within each of the 5 areas in question. These are areas of the city where there are already high levels of development interest and activity, and the pressure for development within these areas is expected to continue. Development is not coming forward as a result of policies AP1 to AP5 or indeed other policies in the SLP:DMP; rather it is a result of other adopted plans and policies, and market forces.
- 3.3 Given the above, policies AP1 to AP5 are either "General statements of policy / general aspirations" and "Policy listing general criteria for testing the acceptability / sustainability of proposals". Based on guidance from the HRA Handbook these have therefore been screened out.

Policy EG2 Renewable and low carbon energy schemes

- 3.4 Policy EG2 has not been drafted to support the development of specific energy schemes. It is not an attempt to circumvent due process with regard to the rigorous assessment of potential future applications for renewable energy development. Rather it provides some high level support to such schemes, **subject to consideration of other policies in the Publication SLP:DMP** which is clearly stated in the first paragraph of policy EG2.
- 3.5 In the specific case of geothermal energy, which was a concern for Natural England, there is no specific site or area allocated or designated for geothermal energy. Figure 14 of the SLP:DMP shows the locations in Salford that are likely to have the greatest potential for renewable and low carbon energy based on technical considerations and simply maps the shallow geothermal aquifer. This was identified in a 2010 study for prepared on behalf of AGMA⁵. It notes an area of highly permeable sandstone limestone aquifer extending north from Cheshire and underlying most of the southern portion of Greater Manchester including parts of Salford, which is identified as being potentially feasible for the abstraction of geothermally heated water. Notwithstanding this, further survey work and test drilling would be required to understand its full potential and technical feasibility.

⁴ These are published as part of the Schedules of all comments received to the SLP:DMP and supporting assessments / documents, and responses from the city council to the Key Issues raised,

⁵ URBED, AECOM and Quantum Strategy & Technology, on behalf of AGMA (2010) Decentralised and zero carbon energy planning

3.6 Due to concerns raised in relation to a previous draft of the HRA, Policy EG2 of the SLP:DMP includes a statement that any development of geothermal schemes shall protect the hydrology of the Manchester Mosses Special Area of Conservation (SAC).

4. Conclusions

4.1 This addendum report documents consideration of modifications to the Publication SLP:DMP, in line with the recommendation in paragraph 9.4 of the December 2019 HRA.

4.2 None of the proposed modifications are considered to have any likely significant effect on European sites.

4.3 The conclusion in the HRA report⁶ that the Local Plan policies would have no effect on the integrity of European Sites, alone or in combination with other plans and proposals, remains valid.

⁶ GMEU (December 2019) Habitats Regulations Assessment of the Impact on European Protected Sites of Salford Local Plan: Development Management Policies and Designations

Annex 1 - Summary Policy Assessment Categories

The policy types / categories below are taken from Chapter F of the Habitats Regulations Assessment Handbook (DTA Publications, 2019)

Abbreviation	Category/ Policy Type
A	General statements of policy / general aspirations (screened out)
B	Policy listing general criteria for testing the acceptability / sustainability of proposals (screened out)
C	Proposal referred to but not proposed by the plan (screened out)
D	General plan-wide environmental protection / site safeguarding/ threshold policies (screened out)
E	Policies or proposals that steer change in such a way as to protect European sites from adverse effects(screened out)
F	Policy that cannot lead to development or other change (screened out)
G	Policy or proposal that could not have any conceivable effect on a site (screened out)
H	Policy or proposal the (actual or theoretical) effects of which cannot undermine the conservation objectives (either alone or in combination with other aspects of this or other plans or projects) (screened out)
I	Policy or proposal which may have a likely significant effect on a site alone (screened in)
J	Policy or proposal with an effect on a site but unlikely to be significant effect alone so need to check likely significant effects in combination
K	Policy or proposal unlikely to have a significant effect either alone or in combination (screened out after the in combination test)
L	Policy or proposal which might be likely to have a significant effect in combination (screened in after the in combination test)
M	Bespoke area, site or case-specific policies or proposals intended to avoid or reduce harmful effects on a European Site (screened in)