

JPA8 Seedfield
Topic Paper
PfE 2021

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Section A – Background

1.0 Introduction

- 1.1 In November 2014, the AGMA Executive Board recommended to the 10 Greater Manchester local authorities that they agree to prepare a joint Development Plan Document (“Joint DPD”), called the Greater Manchester Spatial Framework (“GMSF”) and that AGMA be appointed by the 10 authorities to prepare the GMSF on their behalf.
- 1.2 The first draft of the GMSF DPD was published for consultation on 31st October 2016, ending on 16th January 2017. Following substantial re-drafting, a further consultation on the Revised Draft GMSF took place between January and March 2019.
- 1.3 On the 30 October 2020 the AGMA Executive Board unanimously agreed to recommend GMSF 2020 to the 10 Greater Manchester Councils for approval for consultation at their Executives/Cabinets, and approval for submission to the Secretary of State following the period for representations at their Council meetings.
- 1.4 At its Council meeting on 3 December Stockport Council resolved not to submit the GMSF 2020 following the consultation period and at its Cabinet meeting on 4 December, it resolved not to publish the GMSF 2020 for consultation.
- 1.5 As a joint DPD of the 10 Greater Manchester authorities, the GMSF 2020 required the approval of all 10 local authorities to proceed. The decisions of Stockport Council/Cabinet therefore signalled the end of the GMSF as a joint plan of the 10.
- 1.6 Notwithstanding the decision of Stockport Council, the nine remaining districts considered that the rationale for the preparation of a Joint DPD remained. Consequently, at its meeting on the 11th of December 2020, Members of the AGMA Executive Committee agreed in principle to producing a joint DPD of the nine remaining Greater Manchester (GM) districts. Subsequent to this meeting, each district formally approved the establishment of a Joint Committee for the preparation of a joint Development Plan Document of the nine districts.

- 1.7 Section 28 of the Planning and Compulsory Purchase Act 2004 and Regulation 32 of the Town and Country Planning (Local Planning) (England) Regulations 2012 enable a joint plan to continue to progress in the event of one of the local authorities withdrawing, provided that the plan has ‘substantially the same effect’ on the remaining authorities as the original joint plan. The joint plan of the nine GM districts has been prepared on this basis.
- 1.8 In view of this, it follows that PfE should be considered as, in effect, the same Plan as the GMSF, albeit without one of the districts (Stockport). Therefore “the plan” and its proposals are in effect one and the same. Its content has changed over time through the iterative process of plan making, but its purpose has not. Consequently, the Plan is proceeding directly to Publication stage under Regulation 19 of the Town and Country Planning (Local Planning) England Regulations 2012.
- 1.9 Four consultations took place in relation to the GMSF. The first, in November 2014 was on the scope of the plan and the initial evidence base, the second in November 2015, was on the vision, strategy and strategic growth options, and the third, on a Draft Plan in October 2016.
- 1.10 The fourth and most recent consultation on The Greater Manchester Plan for Homes, Jobs and the Environment: the Greater Manchester Spatial Framework Revised Draft 2019 (GMSF 2019) took place in 2019. It received over 17,000 responses. The responses received informed the production of GMSF 2020. The withdrawal of Stockport Council in December 2020 prevented GMSF 2020 proceeding to Regulation 19 Publication stage and instead work was undertaken to prepare PfE 2021.
- 1.11 Where a local planning authority withdraws from a joint plan and that plan continues to have substantially the same effect as the original joint plan on the remaining authorities, s28(7) of the Planning and Compulsory Purchase Act 2004 provides that any step taken in relation to the plan must be treated as a step taken by the remaining authorities for the purposes of the joint plan. On this basis, it is proposed to proceed directly to Publication stage under Regulation 19 of the Town and Country Planning (Local Planning) England Regulations 2012.

1.12 A comprehensive evidence base was assembled to support the policies and proposals in the GMSF 2020. Given the basis on which the Plan has been prepared, this evidence base remains the fundamental basis for the PfE 2021 and has remained available on the GMCA's website since October 2020. That said, this evidence base has been reviewed and updated in the light of the change from GMSF 2020 to the PfE 2021 and, where appropriate, addendum reports have been produced and should be read in conjunction with evidence base made available in October 2020. The evidence documents which have informed the plan are available via the GMCA's website.

2.0 Seedfield Allocation Overview

2.1 The allocation is located in the Seedfield area of Bury and was formerly occupied by Seedfield High School before more recently being used as a training centre. The allocation provides the opportunity to deliver a diverse mix of house types including affordable housing provision for the Seedfield area.

2.2 This Topic Paper brings together a wide range of information and evidence in connection with the proposed strategic site allocation at Seedfield. The paper may be subject to further technical amendments in advance of the formal commencement of consultation.

3.0 Site Details

3.1 The allocation is well-connected to the existing urban area and is located less than 2 kilometres from Bury town centre. In total the allocation measures 5.15 ha with an approximate developable area of 3.46 ha. Approximately 50% of the allocation is previously-developed with the remainder of the allocation being used as playing fields. All of the allocation is currently designated as Green Belt.

4.0 Proposed Development

- 4.1 The Seedfield allocation (JP8) will deliver a broad mix of around 140 homes to diversify the type of accommodation in the Seedfield area. The allocation will make provision for affordable housing in line with local planning policy requirements.
- 4.2 Appendix 3 sets out the JPA8 Seedfield policy wording.
- 4.3 The allocation boundary or the area proposed to be released has not been amended from that proposed in the 2019 GMSF and the unpublished 2020 GMSF.
- 4.4 Furthermore, the number of dwellings proposed within the allocation has not been amended from that proposed in the 2019 GMSF and the unpublished 2020 GMSF.

5.0 Site Selection

- 5.1 The Site Selection work had the purpose of identifying the most sustainable locations for residential and employment development that can achieve the Joint Plan's Vision, Objectives and Spatial Strategy.
- 5.2 The Seedfield allocation is largely surrounded by development within the existing urban area with residential development bounding the site on three sides and the East Lancashire Railway embankment bounding the site to the west.
- 5.3 The Seedfield allocation is already connected to the existing urban area and is in a sustainable location.
- 5.4 Given the above, the allocation was selected for inclusion within the on the basis of Criteria 1 'Land which has been previously developed and/or land which is well served by public transport'. Further detail is provided within in the GMSF Site Selection Paper available at <https://www.greatermanchester-ca.gov.uk/placesforeveryone>.
- 5.5 A 2021 addendum to the background paper has been produced which confirms that as the allocation has not changed since 2020, the conclusions from the GMSF Site Selection Topic Paper 2020 remain applicable.

- 5.6 The Seedfield allocation fits within the overall Places for Everyone spatial strategy in that it will contribute to inclusive growth. The allocation will contribute to the Borough’s future housing supply and provide a diverse mix of house types and affordable housing provision.
- 5.7 The PfE vision will be delivered through the pursuit of a number of broad objectives. The Seedfield allocation will contribute to meeting the following PfE objectives:
 - Objective 1 - Meet our housing need;
 - Objective 2 - Create neighbourhoods of choice; and
 - Objective 6 - Promote the sustainable movement of people, goods and information.

6.0 Planning History

6.1 There is no relevant planning history for this allocation.

7.0 GMSF 2019 Consultation Responses

7.1 268 comments were received in relation to the allocation during the consultation on the Revised Draft GMSF in 2019. A summary of the key issues raised are provided in Table 1:

Table 1 Summary of Consultation Responses from the Revised Draft GMSF in 2019

Principle / scale of development
<ul style="list-style-type: none"> ▪ The local area is already largely built-up. ▪ Streets would be preferred to cul-de-sacs. ▪ The site needs redevelopment and represents an obvious infill opportunity on the edge of the urban area.
Housing (incl. affordable housing)
<ul style="list-style-type: none"> ▪ Concern that proposed homes will not be affordable.
Green Belt

<ul style="list-style-type: none"> ▪ This allocation is already part of a built-up area and should not be Green Belt.
<p>Brownfield</p>
<ul style="list-style-type: none"> ▪ Practical use of a brownfield site and an obvious infill opportunity that needs redevelopment. ▪ The plan should include more sites like this on brownfield land.
<p>Transport – Highways / Public Transport / Cycling / Walking</p>
<ul style="list-style-type: none"> ▪ The only access point into the site is inadequate. It is narrow and used for parking, has poor access for emergency services and additional access points are required. ▪ Additional development would lead to likely congestion on the A56. ▪ Public transport improvements are required e.g. rail/Metrolink. ▪ There is a lack of detailed information on transport interventions. ▪ Site represents an accessible brownfield site close to bus route and town centre.
<p>Physical Infrastructure and utilities</p>
<ul style="list-style-type: none"> ▪ Lack of detailed information on infrastructure requirements and provision.
<p>Social Infrastructure</p>
<ul style="list-style-type: none"> ▪ Existing schools in northeast Bury over-subscribed. The former secondary school at Seedfield should be brought back into use. ▪ GPs and dentists are in short supply. ▪ A new sports hall is required as part of the proposals. ▪ Lack of detailed information on social infrastructure requirements and what the community benefits will be.
<p>Environmental</p>
<ul style="list-style-type: none"> ▪ These proposals would lead to a loss of wildlife. We need to make the most of natural resources. ▪ There would be a loss of recreation space, in particular playing pitches. These are in demand and there is a lack of suitable replacement sites in the area. ▪ Open space should be maintained by developers. ▪ A buffer is required to the west of the site. ▪ There is a lack of detailed information on proposals such as evidence on existing GM ecological networks or an Ecological Impact Assessment. ▪ Welcome the proposed off-road access from the site to Burrs Country Park, walking/cycle routes should include Green Infrastructure and needs to be made accessible for horse riders.
<p>Air Quality</p>
<ul style="list-style-type: none"> ▪ Concern that congestion will negatively impact air quality.

Other
<ul style="list-style-type: none">▪ Little done to publicise proposals, online portal was difficult to use and questions were leading in nature.▪ Lack of detail on approach taken/reasoning e.g. not clear why previous sites rejected, why some districts have not released Green Belt and others have.▪ Imbalance between Green Belt loss in north and south.

8.0 GMSF 2019 Integrated Assessment

8.1 The 2019 GMSF Integrated Assessment (IA) is available at

<https://www.greatermanchester-ca.gov.uk/placesforeveryone>.

8.2 The IA reviewed how the draft 2019 GMSF policies could impact upon the environment, the economy, local communities, equality and public health. The IA also recommended ways in which the GMSF could be improved to ensure that the policies are as sustainable as possible.

8.3 The Seedfield allocation performed very well against the 2019 Integrated Assessment objectives. However a number of recommendations were made:

- Make specific reference to energy efficiency of the housing stock.
- Consider how housing land can enhance work force skills and training, such as through construction jobs.
- Consider a feasibility study into requirements and ability of local network to support development.
- Benefits such as creation of construction and operational employment, improved transport links or increases in the range of community facilities in deprived areas. Where possible such benefits should be maximised to help bring about long term benefits for deprived areas.
- The allocation policy could reference integration with existing communities and also encourage the provision of varied tenures within the development.

- Ensure any new provision is accessible to all and that local capacity is considered throughout future masterplanning stages.
- Seek to minimise the number of trips made by private car to/from the site. Consider use of mitigation solutions including green infrastructure, incentivising electric vehicles and/or masterplan layout which reduces emissions near sensitive receptors. This is especially appropriate towards the south eastern side nearest to the AQMA.
- Consider ecological receptors throughout detailed design to reduce risk throughout construction and operational phases.
- Integrate green infrastructure throughout the scheme at masterplan stage.
- A suitable flood risk assessment may be required and associated mitigation in order to prevent the Flood Zone expanding.
- Appropriate flood risk mitigation should be implemented (in line with best practice) for all developments that are within or near to areas of flood risk.
- Make reference to energy efficiency directly and ways that it can be increased, such as highlighting the benefits of sustainable modes of transport.
- Consider receptors throughout detailed design to reduce risk throughout construction and operational phases.

8.4 It is important to note that the IA was focusing on each policy in isolation from other policies and that many of the recommended changes for the Seedfield allocation policies were already covered in other GMSF policies. However some wording changes were made as a result of the IA in relation to housing types, electric vehicles, heritage and archaeology.

9.0 GMSF 2020 Integrated Assessment

9.1 An Integrated Appraisal (IA) was undertaken on the 2020 draft GMSF in order to understand how the policy had changed since the 2019 IA and to identify if any

further enhancement/mitigation were required. The 2020 GMSF Integrated Assessment (IA) is available at <https://www.greatermanchester-ca.gov.uk/placesforeveryone>.

9.2 The majority of the 2019 recommendations for the Seedfield allocation had been positively addressed by the 2020 allocation policy itself or other GMSF thematic policies. However the 2020 IA did recommend a further three changes in order to further strengthen the policies:

- Climate Change - since the 2019 IA was undertaken there has been greater emphasis on the climate change agenda and this is reflective of the declaration of a climate emergency by the ten GM authorities;
- Accessible design standards – whilst this was broadly covered in Policy GM-E1 and within GM-H3 relating to housing, it was suggested that policies were strengthened with more specific reference to accessible design of buildings and spaces to meet the needs of users. This could be achieved through strengthening Policy GM-E1.
- Deprivation - whilst this was also broadly covered within the supporting text within Policy GM-E1, particularly referencing social inclusivity, it was considered that the policy could be more explicit in terms of inclusive growth and making jobs available to existing local communities or to those suffering deprivation.

9.3 These recommendations were incorporated into the final 2020 GMSF.

10.0 PfE 2021 Integrated Appraisal Addendum

10.1 A 2021 PfE Integrated Appraisal Addendum has been produced and has reviewed the changes made between GMSF 2020 and PfE 2021. As there have been no substantial changes to this specific allocation between GMSF 2020 and PfE 2021 and the 2020 IA recommendations which had been incorporated into the GMSF 2020 remain in the PfE Policy, there has been no change to the assessment of this Policy in relation to the IA Framework since 2020.

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Section B – Physical

11.0 Transport

11.1 No strategic transport interventions have been identified for the allocation. However, a signalised junction at Walmersley Road could potentially be required if traffic modelling demonstrates that it is necessary and a secondary emergency access point into the allocation may also be required. Further work will be required to establish the exact nature of any transport interventions as the allocation moves through the planning process.

12.0 Flood Risk and Drainage

Flood Risk Summary

12.1 The allocation is located within Flood Zone 1.

12.2 The allocation is at low risk of surface water flooding.

GMSF Greater Manchester Level 1 Strategic Flood Risk Assessment

12.3 The Greater Manchester Level 1 Strategic Flood Risk Assessment (GM Level 1 SFRA) (<https://www.greatermanchester-ca.gov.uk/placesforeveryone>) was completed in March 2019 as part of the evidence base to inform the preparation of the GMSF. This SFRA initiated the sequential risk-based approach to the allocation of land for development and identified whether application of the Exception Test was likely to be necessary using the most up-to-date information and guidance.

12.4 The Level 1 SFRA recommended that development could be permitted due to low flood risk perceived from EA flood maps.

12.5 A site specific flood risk assessment will be undertaken as part of any development proposals as necessary and prior to the submission of any future planning application/s.

13.0 Ground Conditions

- 13.1 There are no known ground conditions within the allocation. However, detailed assessments of the ground conditions will be undertaken prior to the submission of any future planning application/s.

14.0 Utilities

United Utilities

- 14.1 United Utilities in their response to the 2019 GMSF consultation highlighted that new development should be focused in sustainable locations which are accessible to local services and infrastructure. United Utilities will continue to work to identify any infrastructure issues and appropriate resolutions throughout the development of the Plan.
- 14.2 In relation to the Seedfield allocation, United Utilities have advised that a combined sewer falls within the allocation and consideration will need to be given to either diverting this sewer if possible or any potential easements should the sewer remain in situ. Consideration must also be given to the disposal of surface water in the most sustainable way. The Site Promoters will be required to agree drainage proposals prior to the submission of any future planning applications.

Electricity

Electricity North West

- 14.3 Electricity North West carried out assessments on the proposed PfE allocations which have fed into the GMCA 'Spatial Energy Plan'. This is a high level assessment of the expected impact of the proposed developments on the electricity network. In relation to Seedfield, the assessment indicated that primary substation capacity in the area may be above 95% of capacity due to forecast additional load resulting from proposed developments.

14.4 Electricity North West in their response to the 2019 GMSF consultation, advised that they were confident in being able to meet the network capacity requirements for the level of investment and growth proposed in Greater Manchester. Where necessary they have secured the appropriate regulatory allowances within their ‘Well Justified Business Plan.’

Gas

National Grid Infrastructure

14.5 Discussions with National Grid will need to take place as the allocation moves through the planning process to establish whether or not any existing infrastructure needs to be diverted as a result of the proposals. Discussions will also need to take place to establish if there is sufficient capacity within the network to support the proposals or if any upgrades to the existing infrastructure are required.

Telecommunications

Existing BT Infrastructure

14.6 Further detailed discussions will need to take place with BT as the allocation moves through the planning process to establish whether or not any existing infrastructure needs to be diverted as a result of the proposals. Discussions will also need to take place to establish if there is sufficient capacity within the network to support the proposals or if any upgrades to the existing infrastructure are required.

Existing Virgin Media Infrastructure

14.7 Further detailed discussions will need to take place with Virgin Media as the allocation moves through the planning process to establish whether or not any existing infrastructure needs to be diverted as a result of the proposals. Discussions will also need to take place to establish if there is sufficient capacity within the network to support the proposals or if any upgrades to the existing infrastructure are required.

Section C – Environmental

15.0 Green Belt Assessment

- 15.1 The proposed removal of the Seedfield Allocation has been informed by several studies undertaken by LUC available at: <https://www.greatermanchester-ca.gov.uk/placesforeveryone>
- The Greater Manchester Green Belt Assessment 2016
 - Green Belt Harm Assessment, 2020;
 - Greater Manchester Green Belt Study – Identification of Opportunities, 2020;
 - Greater Manchester Green Belt Study Addendum: Assessment of Proposed 2021 PfE Plan Allocations
- 15.2 The proposed allocation would involve the release of around 5 hectares of land from the Green Belt.
- 15.3 In 2016 GMCA commissioned LUC to undertake an assessment of the Green Belt within GM. The Study assessed the extent to which the land within the GM Green Belt performs against the purposes of Green Belts, as set out in paragraph 80 of the National Planning Policy Framework (NPPF). The aim of this Green Belt Assessment is to provide the GM Authorities with an objective, evidence-based and independent assessment of how GM's Green Belt contributes to the five purposes of Green Belt, as set out in national policy. It also examines the case for including within the Green Belt potential additional areas of land that currently lie outside it.
- 15.4 In the Greater Manchester Green Belt Assessment 2016, GM Allocation 8 Seedfield was included within Strategic Green Belt Area 11.
- 15.5 There were 4 different purposes of Green Belt that each Area was assessed against and Area 11 performs as follows:

Table 2. Assessment of allocation against the purposes of Green Belt.

Purpose	Performance of area
To check the unrestricted sprawl of large built up areas	Moderate-Strong
To prevent neighbouring towns from merging into one another	Strong
To assist in safeguarding the countryside from encroachment	Moderate-Strong
Preserving the setting and special character of historic towns	Moderate

- 15.6 In 2019 LUC carried out an assessment identifying the potential opportunities to enhance the beneficial use of remaining Green Belt within 2 km of the allocation site (available at <https://www.greatermanchester-ca.gov.uk/placesforeveryone>). The study considered the opportunities to offset the loss of Green Belt through compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land.
- 15.7 Land lying within 2 km of GM Allocation 8 Seedfield formed the focus of GI recommendations/mitigation to enhance the ‘beneficial use’ of the Green Belt. There are 3 proposed additions to the Green Belt within 2 km of the Seedfield Allocation – Woolfold, Pigs Lea Brook 1 and Chesham.
- 15.8 The potential GI opportunities in the Green Belt relevant to the Seedfield allocation identified in the assessment include:
- Improve strategic pedestrian and cycle linkages along the River Irwell or the preserved East Lancashire Railway towards Bury Town Centre and Burrs Country Park;
 - Improve access and enhance the green corridor or the River Irwell in this location to create local leisure and tourism opportunities;

- Introduce new crossing points within the adjacent Green Belt south west of JPA8 Seedfield linking Woodhill Road Park and the suburbs of Seedfield/Limefield.
- Relocate Seedfield Sports Club to a suitable location to land within or out with the adjacent Green Belt;
- Walking routes including signage should be reviewed to link neighbouring open space facilities within the adjacent Green Belt;
- Refurbish sports facilities at Clarence Park;
- Incorporate green infrastructure enhancements at existing SBIs, including habitat management in conjunction with GMEU's recommendations at these locations;
- Enhance the Castlesteads scheduled monument within adjacent Green Belt in Burrs Country Park to the north;
- Enhance semi natural habitats and network, including riparian and broadleaved woodland and regenerating habitats typical at Burrs Country Park.
- Incorporate woodland creation schemes based on the Northern Forest Initiative at Burrs Country Park;
- Hedgerow restoration at Brandlesholme Road.

15.9 Some of these opportunities have been included within the policy requirements for the allocation. Others would be more appropriately dealt with a detailed masterplan or planning application(s).

15.10 In conjunction with the assessment of GI opportunities within the Green Belt, LUC carried out an assessment to identify potential harm to the Green Belt through a Green Belt Harm Assessment, 2020. The report concluded that the allocation makes a limited contribution to Green Belt purposes. Release of the allocation would not

increase the containment of any retained Green Belt land and would result in a strong and consistent Green Belt boundary to the west, which would be defined by a woodland edge and bolstered by the railway line and the River Irwell.

- 15.11 Following the decision of Stockport Council to withdraw from the GMSF and the subsequent decision to prepare PfE, LUC produced a further addendum report in 2021. This report considers the impact, in terms of harm to the Green Belt purposes from the release of land, of changes to the proposed Allocation boundaries and areas of Green Belt release identified in the 2021 PfE Plan. Given the allocation boundary or the area proposed to be released has not been amended from that proposed in the 2020 GMSF, the conclusions for Seedfield identified in the 2020 Green Belt studies remain the same.
- 15.12 Evidence on Green Belt is only one part of the evidence base that influence any decision on Green Belt release. Consequently, where studies have found that harm is to be caused by release of the Green Belt, this finding should be balanced against other important factors that could make up exceptional circumstances such as sustainability, viability and deliverability.
- 15.13 The Seedfield allocation is deemed necessary to deliver a housing opportunity with supporting infrastructure. The allocation responds to the spatial strategy in the PfE Joint Plan and its key themes of 'Inclusive Growth' and 'Addressing Disparities' It also directly addresses the aspirations set by Policy JP Strat-6 Northern Areas which seeks to boost economic opportunities and diversify housing provision in the north of the conurbation by the selective release of Green Belt.
- 15.14 The potential GI opportunities in the Green Belt study discussed earlier are not exhaustive and will require consultation with key stakeholders/landowners and may require further surveys and viability testing to establish costings. However, the enhancement opportunities nonetheless demonstrate that opportunities exist to help offset the loss of Green Belt which will have a potential positive effect on the beneficial use of the Greater Manchester Green Belt moving forward.

15.15 The final masterplan for the allocation will be required to use the findings from all the assessments on Green Belt in the area to inform the layout and form development across the allocation.

16.0 Green Infrastructure

16.1 Existing green infrastructure elements can be found to the west and south of the allocation. These will be retained and enhanced as part of any future proposals. Appropriate mitigation measures to provide health benefits to residents as well as measures to create a visually attractive environment will also be provided.

17.0 Recreation

17.1 Part of the allocation is currently used as playing fields. In addition to making provision for the recreational needs of the prospective residents of the new development, there will also be a requirement to provide replacement sports pitch provision to off-set the loss of the existing playing fields within the allocation. It is important that the replacement provision should be accessible, be of an equivalent or greater quantity and quality and laid out and usable prior to the commencement of any development on the Seedfield allocation

18.0 Landscape

18.1 The proposals will retain any existing well-established landscape features such as mature trees and hedgerows. These will be integrated within the development alongside new planting to enhance the ecological value of the allocation.

19.0 Ecological/Biodiversity Assessment

19.1 There are no known ecological issues on the allocation and it should be suitable for residential development in principle. There is, however, a wildlife corridor to the west and south of the allocation that will need to be retained and enhanced as part of any proposals.

19.2 A detailed Ecological Assessment will be undertaken as part of any development proposals as necessary.

20.0 Habitat Regulation Assessment

20.1 A Habitat Regulation Assessment (HRA) is required for the PfE Joint Plan because it is considered to have the potential to cause harm to the special nature conservation interest of European Protected Sites. A HRA was carried out on the 2020 GMSF.

20.2 The Assessment first screened European protected sites in the North West to decide which sites are most likely to be affected by development in Greater Manchester. In carrying out this initial screening process the Assessment considered the main possible sources of effects on the European sites arising from The Plan, possible pathways to the European sites and the effects on possible sensitive receptors in the European sites. Only if there is an identifiable source, a pathway and a receptor is there likely to be a significant effect.

20.3 Since the Joint Plan is a high-level, large-scale strategic plan where the main impacts on European sites are likely to be diffuse and cumulative it is considered that certain potential diffuse or indirect sources will be more likely to result from the Plan than more direct sources of harm. None of the proposed allocations in the Plan will result in direct land-take of any European sites.

20.4 These sources are considered to include –

- air pollution,
- diffuse water pollution and
- recreational pressures.

20.5 Taking the above into account, the following European protected sites were screened into the Assessment:

1. Manchester Mosses Special Area of Conservation (SAC)
2. Rochdale Canal Special Area of Conservation (SAC)

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3. Peak District Moors South Pennines (Phase 1) Special Area of Conservation (SAC)

4. Peak District Moors South Pennines (Phase 1) Special Protection Area (SPA)

5. South Pennine Moors (Phase 2) Special Area of Conservation (SAC)

6. South Pennine Moors (Phase 2) Special Protection Area (SPA)

7. Rixton Claypits Special Area of Conservation (SAC)

8. Mersey Estuary Special Protection Area (SPA)

9. Rostherne Mere Ramsar / National Nature Reserve

20.6 The GMCA and TfGM are responding to Natural England's comments on the draft HRA by commissioning additional air quality modelling to assess the implications of changes more accurately in air quality on European sites that could potentially be affected by changes to nitrogen levels arising from changes in vehicle movements in Greater Manchester or within close proximity of the Greater Manchester boundary.

20.7 A Habitat Regulation Assessment (HRA) has been undertaken and supported by an assessment of air quality impacts on designated sites. The following sites have been screened out at Stage 1 HRA:

- Rixton Clay Pits (SAC)
- Midland Meres & Mosses – Phase 1 Ramsar
- Rostherne Mere (Ramsar)

20.8 The following sites requires Stage 2 Appropriate Assessment:

- Manchester Mosses (SAC)
- Peak District Moors (South Pennine Moors Phase 1) (SPA)
- Rochdale Canal (SAC)

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- South Pennine Moors (SAC)
- South Pennine Moors Phase 2 (SPA)

20.9 The GMCA are also responding to Natural England's comments on functionally linked land, recreation disturbances, water pollution and in-combination effects. Details of this are included in the HRA and Assessment of Air Quality Impacts on Designated Sites report.

21.0 Historic Environment Assessment

21.1 The GMSF Historic Environment Assessment Screening Exercise (June 2019) (available here: <https://www.greatermanchester-ca.gov.uk/placesforeveryone>) concluded that no further assessment of the allocation is required. There are no designated assets nearby or within the allocation and the allocation has no archaeological interest.

22.0 Air Quality

22.1 The scale of development should not result in any air quality issues to the surrounding area in respect of traffic emissions. The allocation is well placed to encourage travel by non-car modes of transport which will help minimise the extent to which additional traffic from the allocation might result in air quality emissions.

22.2 An Air Quality Assessment will be undertaken as part of any development proposals as necessary.

23.0 Noise

23.1 Given the allocation's location adjacent to the urban area, the prevailing use is residential. It is therefore considered that there are no significant noise constraints in the local area which might affect the development of the allocation.

23.2 A detailed Noise Assessment will be undertaken, as necessary, as part of any development proposals and any required mitigation will be embedded within the proposed development.

Section D – Social

24.0 Education

- 24.1 The Seedfield Allocation is expected to yield around 29 primary age pupils and 20 secondary age pupils. Current forecasts indicate that there will be sufficient capacity in the area to accommodate this modest yield of primary age pupils.
- 24.2 Cumulative secondary age demand pressures will need to be considered more strategically, and in conjunction with other proposed developments across North Bury.

25.0 Health

- 25.1 Further work will be required to determine whether there is additional capacity within any local healthcare facilities to meet the increased demands arising from the prospective occupants of the new development.
- 25.2 If additional provision is necessary, the most appropriate means and location for such provision can be identified through future iterations of the masterplan. Alternatively, there may be a requirement to make a financial contribution toward off site health provision through a planning obligation or condition at the planning application stage.

Section E – Deliverability

26.0 Viability

26.1 The Three Dragons Viability Appraisal of the allocation using the base model shows a positive result for the allocation, including provision of 25% affordable housing and other policy requirements. The transport costs for the scheme are incorporated within the base model because they are not strategic interventions. The results are set out in the table below:

Table 3. Definitions for viability appraisals

Key phrase	Description
Test Type	Whether the test is the 'Base' test or a sensitivity test
Total BMLV, SDLT & Land acq fees	The total figure used in the testing for land value, includes tax and fees. BLV = benchmark land value SDLT = Stamp duty land tax
Scheme RV (incl BLV & return)	Scheme value (could also be described as headroom) once all costs have been accounted for including land and developer return RV = Residual value BLV = benchmark land value
Viability measure as a % of BLV	Description of whether the scheme provides sufficient residual value in terms of how it compares with the benchmark land value i.e. if it is 10% or more above the benchmark land value it is shown as green, if it is within 10% of the benchmark land value it is shown as amber and where it is less than 90% of the benchmark land value it is shown as red.
Headroom (blended return)	The headroom expressed as blended rate of return. The percentages shown are the headroom available after all costs,

	except developer return divided by the total gross development value for the scheme. If schemes were to go ahead as described, then this is the total return available to the developer.
Test result category	Category 1 - The residual value is positive and the residual value is 10% or more above the benchmark land value. Schemes in this group are viable and should be able to proceed.

Table 4 Viability Appraisal Results

Test Type	Total BLV, SDLT & Land acq fees	Scheme RV (incl BLV & return)	Viability measure as a % of BLV	Headroom (blended return)	Test result category
Base model	£1,360,000	£540,000	More than 10% BLV	17%	Cat 1

26.2 The testing indicates a headroom of £540,000, and shows that the scheme is viable based on the high level Three Dragons appraisal. The allocation is classed as Category 1 – the residual value is 10% or more above the benchmark land value, it is viable and should be able to proceed.

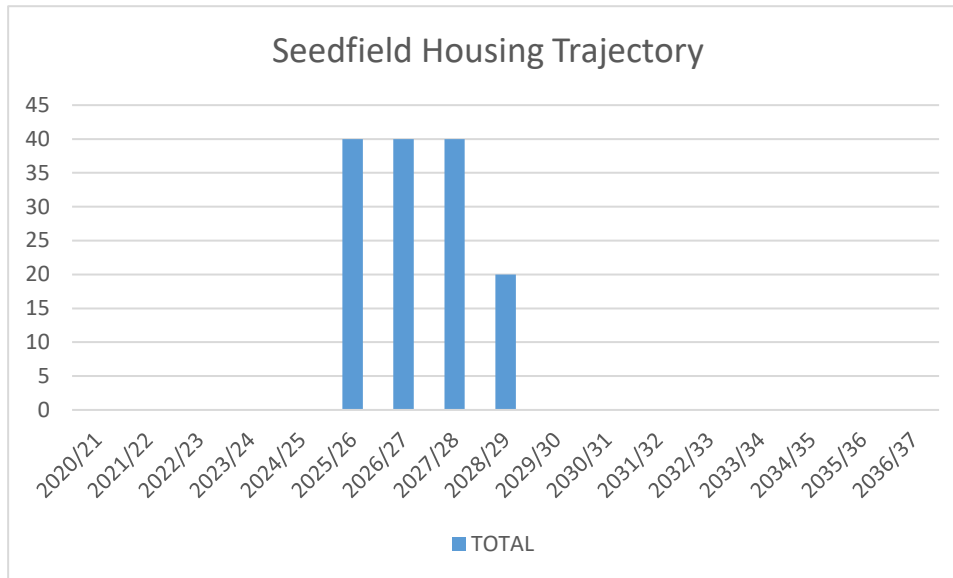
27.0 Phasing

27.1 This is a comparatively small partly previously developed allocation in single ownership (owned by Bury Council), with existing highways access and other infrastructure provision. There are no major infrastructure constraints to be overcome before the allocation can be delivered. Therefore it will be relatively straightforward to develop as one outlet in a single phase.

27.2 The allocation is anticipated to deliver 40 dwellings per year from 2025/26, with the final completions estimated for 2028/29. The delivery rate of 40 per annum is in line with other similar sites delivered in the Borough. The first completions are estimated for 2025/26 to give ample time for planning approval to be obtained following adoption of the PfE Joint Plan. This allocation could in fact begin to deliver housing ahead of the PfE Joint Plan as it is partially previously developed, but a more cautious start date has been applied. The previously developed part of the allocation

may be developed ahead of relocation of the existing football pitches to an alternative location.

Figure 1. Seedfield Housing Trajectory



28.0 Indicative Masterplanning

28.1 Paragraph 145 of the National Planning Policy Framework specifies that a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt but that exceptions to this are limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:

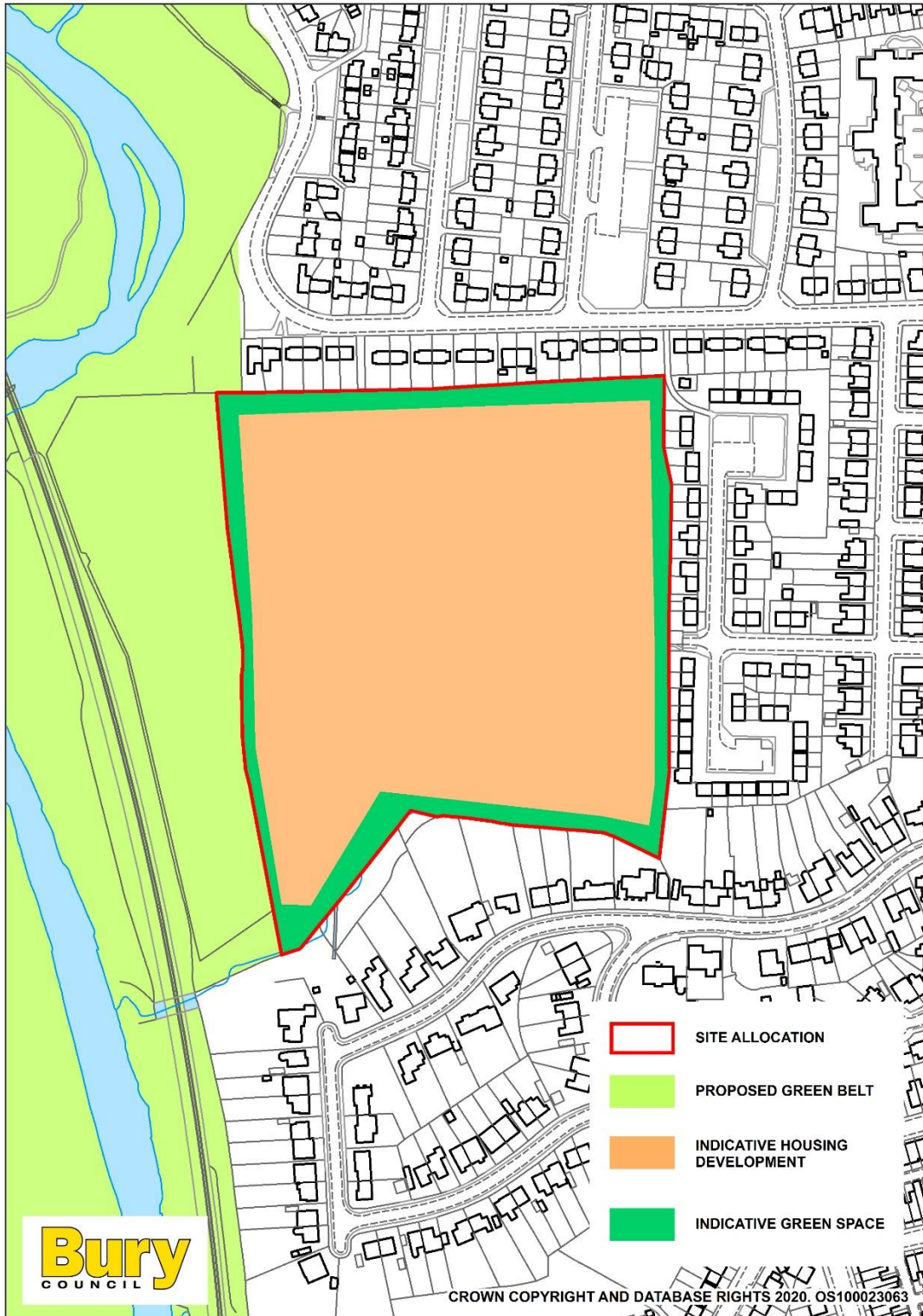
- not have a greater impact on the openness of the Green Belt than the existing development; or
- not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

28.2 As such, given that a significant part of the Seedfield allocation is previously-developed, it is considered that, in principle, it has the potential to be acceptable

within the context of current Green Belt policy and is not dependent on the removal of the Green Belt designation through the PfE process. As such, the Seedfield allocation has not been subject to the detailed masterplanning work that has been done on other allocations as part of the justification for removing Green Belt.

- 28.3 Nevertheless, a high-level indicative plan has been prepared to identify potential extent of housing development and to reflect principles around the provision of areas of open space.

Figure 2 : Indicative Masterplan for the Seedfield Allocation (JPA8).



Section F – Conclusion

29.0 The Integrated Appraisal

- 29.1 An Integrated Appraisal (IA) was undertaken on the 2020 draft GMSF in order to understand how the policy had changed since the 2019 IA and to identify if any further enhancement/mitigation was required.
- 29.2 The majority of the 2019 recommendations for GM8 Seedfield were positively addressed by the 2020 GMSF policy itself or another thematic policy. A small number of residual recommendations remained from the 2019 IA, in order to further strengthen the policies:
- Climate Change – since the 2019 IA was undertaken there has been greater emphasis on the climate change agenda and this is reflective of the declaration of a climate emergency by the ten GM authorities;
 - Accessible design standards – whilst this is broadly covered in Policy GM-E1 (now JP-P1) and within GM-H3 (now JP-H3) relating to housing, it was suggested that policies are strengthened with more specific reference to accessible design of buildings and spaces to meet the needs of users. This could be achieved through strengthening Policy GM-E1 (now JP-P1).
 - Deprivation – whilst this is also broadly covered within the supporting text and broadly within Policy GM-E1 (now JP-P1), particularly referencing social inclusivity, it is considered that the policy could be more explicitly in terms of inclusive growth and making jobs available to existing local communities or to those suffering deprivation.
- 29.3 These recommendations were incorporated into the final 2020 GMSF.
- 29.4 A 2021 PfE Integrated Appraisal Addendum has been produced and has reviewed the changes made between GMSF 2020 and PfE 2021. As there have been no substantial changes to this specific allocation between GMSF 2020 and PfE 2021 and the 2020 IA recommendations which had been incorporated into the GMSF

2020 remain in the PfE Policy, there has been no change to the assessment of this Policy in relation to the IA Framework since 2020.

30.0 The main changes to the Proposed Allocation.

30.1 The 2020 GMSF GM8 Seedfield policy included additional criteria, to that presented in the 2019 policy¹, requiring:

- Make provision for other necessary infrastructure such as utilities, broadband and electric vehicle charging points in accordance with relevant GMSF or local planning policies
- Minimise impacts on and provide net gains for biodiversity assets within the allocation in accordance with Policy GM-G9 A Net Enhancement of Biodiversity and Geodiversity (now JP-G9);
- Make appropriate provision for the long term management and maintenance of areas of green infrastructure, biodiversity features and sustainable drainage features.

30.2 A significant amount of evidence base work has been produced to support the allocation since 2019 and this has allowed the criteria within the 2020 Policy to be expanded upon and be more specific to the allocation.

30.3 With the exception of the policy reference numbers, the 2021 PfE Seedfield Allocation replicates that proposed in the 2020 GMSF.

31.0 Conclusion

¹ See Appendix 1, 2 & 3 for the 2019, 2020 & PfE Seedfield Allocation policy.

- 31.1 JPA8 Seedfield is considered to meet the site selection criteria and make a positive contribution towards the overall vision, objectives and strategy of the PfE Joint Plan. The allocation is considered to be deliverable and available for development.
- 31.2 The allocation provides the opportunity to deliver a residential development in a location which is well-connected to the existing urban area and is less than 2 kilometres from Bury town centre. It provides an opportunity to deliver a diverse mix of house types and affordable housing provision for the Seedfield area.
- 31.3 Appendix 3 sets out the JPA8 Seedfield policy wording.

Section G – Appendices

Appendix 1 – Policy GM Allocation 8 Seedfield (GMSF, 2019)

Development at this site will be required to:

1. Deliver a broad mix of around 140 houses to diversify the type of accommodation in the Seedfield area;
2. Make provision for affordable housing in accordance with local planning policy requirements;
3. Make provision for recreation to meet the needs of the prospective residents in accordance with local planning policy requirements;
4. Make provision for additional capacity at existing schools in the area to meet additional demand arising from the development in accordance with local planning policy requirements;
5. Make necessary improvements to local highway infrastructure to facilitate appropriate access to the site and incorporate enhancements to public transport, pedestrian and cycle routes in the area;
6. Ensure the design and layout allows for effective integration with surrounding communities through the incorporation of linkages and connections that allow for sustainable modes of travel such as new walking and cycling routes, including improved access to Burrs Country Park;
7. Retain, enhance the wildlife corridor and green infrastructure elements to the west and south of the site and introduce appropriate mitigation measures;
8. Secure and bring into use suitable replacement sports facilities; and
9. Ensure that any development is safe from potential flood risk from any source and incorporate measures to mimic natural drainage through the use of green sustainable urban drainage to control the rate of surface water run-off.

The delivery of the allocation and its associated infrastructure will be expected to be supported by a comprehensive masterplan to be agreed with the local planning authority.

Justification

The site is well-connected to the existing urban area and is less than 2 kilometres from Bury town centre. It provides an opportunity to deliver a diverse mix of house types and affordable housing provision for the Seedfield area.

Around 50% of the site is previously-developed and a large part of the remaining land is used as playing fields. In addition to making provision for the recreational needs of the prospective residents of the new development, there will also be a requirement to provide replacement sports pitch provision to off-set the loss of the existing playing fields within the site. It is important that the replacement provision should be accessible, be of an equivalent or better quantity and quality and laid out and usable prior to the commencement of any development on the Seedfield site.

The development will generate additional demands for education that will need to be provided for through investment in existing schools in accordance with Local Plan policy requirements.

The attractive setting of the development will be further strengthened by the provision of improved east/west pedestrian and cycle linkages, particularly to and from the expanding leisure attractions at Burrs Country Park.

The development of the site will also be required to have regard to flood risk and it will also be necessary for the development to implement an appropriate drainage strategy in order to minimise and control the rate of surface water run-off.

Appendix 2 – GM Allocation 8 Seedfield (GMSF, 2020)

Development in this allocation will be required to:

1. Deliver a broad mix of around 140 houses to diversify the type of accommodation in the Seedfield area;

2. Make necessary improvements to local highway infrastructure to facilitate appropriate access to the allocation and incorporate enhancements to public transport, pedestrian and cycle routes in the area;
3. Make provision for affordable housing in accordance with local planning policy requirements, equivalent to at least 25% of the dwellings on the site and across a range of housing types and sizes (with an affordable housing tenure split of around 60% social or affordable rented and 40% affordable home ownership);
4. Make provision for other necessary infrastructure such as utilities, broadband and electric vehicle charging points in accordance with relevant GMSF or local planning policies;
5. Ensure the design and layout allows for effective integration with surrounding communities, including active travel links to Burrs Country Park and employment opportunities in Bury Town Centre;
6. Retain and enhance and/or replace existing recreation facilities and make provision for new recreation facilities to meet the needs of the prospective residents in accordance with local planning policy requirements;
7. Retain, enhance the wildlife corridor and green infrastructure elements to the west and south of the allocation and introduce appropriate mitigation measures to provide health benefits to residents as well as creating a visually attractive environment in accordance with Policy GM-G 2 'Green Infrastructure Network' and Policy GM-G 8 'Standards for a Greener Greater Manchester';
8. Minimise impacts on and provide net gains for biodiversity assets within the allocation in accordance with Policy GM-G 9 'A Net Enhancement of Biodiversity and Geodiversity';
9. Ensure the allocation is safe from and mitigates for, potential flood risk from all sources including surface water, sewer flooding and groundwater. The delivery of the allocation should be guided by an appropriate flood risk and drainage strategy which ensures co-ordination between phases of development;

10. Ensure that sustainable drainage systems are fully incorporated into the development to manage surface water and control the rate of surface water run-off, discharging in accordance with the hierarchy of drainage options. Where possible, natural SuDS techniques should be utilised, prioritising the use of ponds, swales and other infrastructure which mimic natural drainage and be designed as multi-functional green infrastructure connecting to the wider green and blue infrastructure network in accordance with Policy GM-S 5 'Flood Risk and the Water Environment' and nationally recognised SuDS design standards. Proposals to discharge to the public sewer will need to submit clear evidence demonstrating why alternative options are not available.; and
11. Make appropriate provision for the long term management and maintenance of areas of green infrastructure, biodiversity features and sustainable drainage features.

Justification

The allocation is well-connected to the existing urban area and is less than 2 kilometres from Bury town centre. It provides an opportunity to deliver a diverse mix of house types and affordable housing provision for the Seedfield area.

Around 50% of the allocation is previously-developed and a large part of the remaining land is used as playing fields. In addition to making provision for the recreational needs of the prospective residents of the new development, there will also be a requirement to provide replacement sports pitch provision to off-set the loss of the existing playing fields within the allocation. It is important that the replacement provision should be accessible, be of an equivalent or better quantity and quality and laid out and usable prior to the commencement of any development on the Seedfield allocation.

The attractive setting of the development will be further strengthened by the provision of improved east/west pedestrian and cycle linkages, particularly to and from the expanding leisure attractions at Burrs Country Park.

Delivery of the allocation should be guided by an appropriate flood risk and drainage strategy. Measures such as rainwater recycling, green roofs, water butts and

permeable driveway surfaces should be considered to mitigate the impact of potential flood risk both within and beyond the site boundaries. As a green and blue infrastructure network will provide more sustainable options discharge surface water, only foul flows should connect with the public sewer.

Appendix 3 – Policy JP Allocation 8 Seedfield (Places for Everyone, 2021)

Development in this allocation will be required to:

1. Deliver a broad mix of around 140 homes to diversify the type of accommodation in the Seedfield area;
2. Make necessary improvements to local highway infrastructure to facilitate appropriate access to the allocation and incorporate enhancements to public transport, pedestrian and cycle routes in the area;
3. Make provision for affordable housing in accordance with local planning policy requirements, equivalent to at least 25% of the dwellings on the site and across a range of housing types and sizes (with an affordable housing tenure split of around 60% social or affordable rented and 40% affordable home ownership);
4. Make provision for other necessary infrastructure such as utilities, broadband and electric vehicle charging points in accordance with relevant joint plan or local planning policies;
5. Ensure the design and layout allows for effective integration with surrounding communities, including active travel links to Burrs Country Park and employment opportunities in Bury Town Centre;
6. Retain and enhance and/or replace existing recreation facilities and make provision for new recreation facilities to meet the needs of the prospective residents in accordance with local planning policy requirements;
7. Retain and enhance the wildlife corridor and green infrastructure elements to the west and south of the allocation and introduce appropriate mitigation measures to provide health benefits to residents as well as creating a visually attractive

environment in accordance with Policy JP-G 2 'Green Infrastructure Network' and Policy JP-G 8 'Standards for Greener Places';

8. Minimise impacts on and provide net gains for biodiversity assets within the allocation in accordance with Policy JP-G 9 'A Net Enhancement of Biodiversity and Geodiversity';
9. Ensure the allocation is safe from and mitigates for, potential flood risk from all sources including surface water, sewer flooding and groundwater. The delivery of the allocation should be guided by an appropriate flood risk and drainage strategy which ensures co-ordination between phases of development;
10. Ensure that sustainable drainage systems are fully incorporated into the development to manage surface water and control the rate of surface water run-off, discharging in accordance with the hierarchy of drainage options. Where possible, natural SuDS techniques should be utilised, prioritising the use of ponds, swales and other infrastructure which mimic natural drainage and be designed as multi-functional green infrastructure connecting to the wider green and blue infrastructure network in accordance with Policy JP-S 5 'Flood Risk and the Water Environment' and nationally recognised SuDS design standards. Proposals to discharge to the public sewer will need to submit clear evidence demonstrating why alternative options are not available; and
11. Make appropriate provision for the long term management and maintenance of areas of green infrastructure, biodiversity features and sustainable drainage features.

Justification

The allocation is well-connected to the existing urban area and is less than 2 kilometres from Bury town centre. It provides an opportunity to deliver a diverse mix of house types and affordable housing provision for the Seedfield area.

Around 50% of the allocation is previously-developed and a large part of the remaining land is used as playing fields. In addition to making provision for the recreational needs of the prospective residents of the new development, there will also be a requirement to provide replacement sports pitch provision to off-set the loss of the existing playing fields within the

allocation. It is important that the replacement provision should be accessible, be of an equivalent or better quantity and quality and laid out and usable prior to the commencement of any development on the Seedfield allocation.

The attractive setting of the development will be further strengthened by the provision of improved east/west pedestrian and cycle linkages, particularly to and from the expanding leisure attractions at Burrs Country Park.

Delivery of the allocation should be guided by an appropriate flood risk and drainage strategy. Measures such as rainwater recycling, green roofs, water butts and permeable driveway surfaces should be considered to mitigate the impact of potential flood risk both within and beyond the site boundaries. As a green and blue infrastructure network will provide more sustainable options discharge surface water, only foul flows should connect with the public sewer.

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