

Response ID ANON-YQ17-M6GA-W

Submitted to **The Greater Manchester Plan for Homes, Jobs and the Environment**
Submitted on 2019-03-18 22:29:45

About you

1 What type of respondent are you?

I work for an organisation and am submitting this response on its behalf

2 Contact details

What is your first name:

Ian

What is your last name?:

McKerchar

Please provide us with your email address OR full postal address:

gmbirdrg@gmail.com

What is your postcode?:

M29 7EH

3 Are you over the age of 13?

I confirm that I am over the age of 13

4 If you're submitting a response on behalf of an organisation or group, please also give us their details

Organisation / group name:

Greater Manchester Bird Recording Group

Contact address for organisation / group:

42, Green Avenue,
Astley

Postcode for organisation / group:

M29 7EH

Contact email address for organisation / group:

gmbirdrg@gmail.com

5 As part of the planning process, we are required to publish all responses. Your published response can either include your name and / organisation name, or be anonymous. Which would you prefer?

Publish my response in full

8. A Greener Greater Manchester

46 Valuing important landscapes

Agree

What is the reason for your answer?:

47 Green infrastructure network

Mostly agree

What is the reason for your answer?:

Recreational opportunities should not be at the expense of biodiversity. Sensitive habitats and species should be protected from damage and disturbance.

48 River valleys and waterways

Mostly agree

What is the reason for your answer?:

Increasing the use of canals and waterways for active travel needs to ensure that sensitive habitats and species are protected.

49 Lowland wetlands and mosslands

Mostly agree

What is the reason for your answer?:

6. Expanding public access across the area should be managed in a way that avoids damage to sensitive habitats and disturbance to wildlife.

50 Uplands

Agree

What is the reason for your answer?:

There are opportunities to enhance upland habitats through reduced grazing and ensuring that sheep farmers are prevented from burning moorland between March and July when ground nesting birds are breeding,

51 Urban green space

Not Answered

What is the reason for your answer?:

52 Trees and woodland

Mostly agree

What is the reason for your answer?:

4. Tree planting should be avoided on grassland and pasture where priority bird species such as Lapwing and Skylark nest. A recent example of bad practice is the extensive tree planting at Cutacre former Open Cast Coal Site (now Logistics North), Bolton which has deprived a significant number of Skylarks of nesting habitat.

53 Green infrastructure opportunity areas

Mostly agree

What is the reason for your answer?:

Some proposed development allocations will result in the loss of priority habitats and other important semi-natural habitats. This should be avoided.

54 Standards for a Greener Greater Manchester

Not Answered

What is the reason for your answer?:

55 A Net Enhancement of Biodiversity and Geodiversity

Agree

What is the reason for your answer?:

The protection of biodiversity should be given the highest priority. It is vital that we prevent any further loss of important habitats and the decline in species numbers and distribution.

56 The Greater Manchester Green Belt

Not Answered

What is the reason for your answer?:

57 Do you have any comments about a greener Greater Manchester?

Context comments:

supporting info:

No file was uploaded

11a Cross-Boundary Sites

74 Bury / Rochdale - GM Allocation 1: Northern Gateway

Disagree

Please explain your answer:

We are extremely concerned, that this huge area of mainly farmland is being proposed for development, especially given that the Brightley and Whittle Brook corridors have been identified by the Greater Manchester Ecology Unit as an important part of the wider GM ecological network and shown as such on the Green Infrastructure map (figure 10.1 page 65) published in the draft GMSF. The allocation also includes the Pilsworth Site of Biological Importance which should be protected, as well as the land surrounding it. It would appear that the site allocation process is developer led and has given little consideration to the ecological importance of this area.

The allocation site has been monitored for over 20 years by a number of experienced bird recorders who have identified its importance for farmland birds which are used by DEFRA as a key indicator of the health of the countryside. The loss of this extensive area to development would have a significant negative impact on farmland bird populations in both Bury, Rochdale and Greater Manchester, many of which have already suffered major declines in their abundance and distribution over the past thirty years, both nationally and locally. Many of the birds which breed and winter on this area are Species of Principal Importance under the Natural Environment and Rural Communities Act 2006. Natural England identified "protecting and enhancing England's S41 species [as] the key to achieving outcome 3 of the UK government's Biodiversity 2020 Strategy which targets "an overall improvement in the status of our wildlife." In addition the farmland supports an important population of Barn Owls and two other owl species, one of which is monitored nationally by the Rare Breeding Birds Panel.

Many of the proposed GMSF allocations are for logistic hubs and we would request that a strategic study is carried out into the total requirements of the Greater Manchester region for such facilities and that no further development of this type is permitted until future needs are clearly established and unless it is clear that those already granted planning permission will reach capacity before 2035. The choice of sites should be based on minimising ecological impacts across GM and not decided by individual districts seeking to maximise development in their own areas.

Upload supporting information about this allocation:

No file was uploaded

75 GM Allocation 1.1 Heywood / Pilsworth (Northern Gateway)

Disagree

What is the reason for your answer?:

See response to 74. Bury/Rochdale GM Allocation 1

Supporting information - file upload:

No file was uploaded

76 GM Allocation 1.2: Simister and Bowlee (Northern Gateway)

Disagree

What is the reason for your answer?:

See response to 74. Bury/Rochdale GM Allocation 1

Supporting information - file upload:

No file was uploaded

77 GM Allocation 1.3: Whitefield (Northern Gateway)

Disagree

What is the reason for your answer?:

See response to 74. Bury/Rochdale GM Allocation 1

Supporting information - file upload:

No file was uploaded

78 Oldham / Rochdale - GM Allocation 2: Stakehill

Disagree

Please explain your answer:

We are extremely concerned, that this area of mainly farmland is being proposed for development. It would appear that the site allocation process is developer led and has given little consideration to the ecological importance of this area.

Part of the allocation site (the 1km square SD8909) has been monitored for the past 20 years for the British Trust for Ornithology's Breeding Bird Survey and supports a diverse mix of species including the UK Biodiversity Priority Species: Dunnock, House Sparrow, Lapwing, Linnet, Reed Bunting, Skylark, Song Thrush and Starling.

Upload supporting information about this allocation:

No file was uploaded

79 Oldham / Rochdale GM Allocation 3: Kingsway South

Not Answered

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

11c Bury

84 Bury - GM Allocation 7: Elton Reservoir Area

Disagree

Please explain your answer:

The Greater Manchester Bird Recording Group objected to this allocation in January 2017. As the revised January 2019 draft GMSF is substantively unchanged, as far as this allocation is concerned, our comments remain largely the same.

We are extremely concerned that despite the Elton Reservoir area having been identified by the Greater Manchester Ecology Unit as an important part of the wider GM green infrastructure network and shown as such on the Green Infrastructure map published in the draft GMSF, it would appear that the site allocation process is developer led and has given little consideration to the ecological importance of this area. The proposed destruction of large parts of three Sites of Biological Importance (SBIs) adjacent to the River Irwell, in Bury, with significant negative impacts on a further three SBIs, is not acceptable to us and cannot be considered as a sustainable development.

The Sites of Biological Importance (SBIs) at Elton Reservoir form a unique mosaic of habitats not found in this combination elsewhere in Bury, comprising open water, ponds, grassland, hedgerows, marsh, flush, scrub and swamp many of which are UK or Greater Manchester Biodiversity Priority habitats. Elton Reservoir itself is one of the most important sites for birds in Greater Manchester and whilst the proposed development retains the reservoir, its value will be significantly diminished by the encroachment of housing and increased levels of recreational disturbance. The land adjoining the SBIs also plays a key role in the overall ecology of the site providing feeding areas for protected and priority species such as Barn Owl, Curlew, Lapwing and Skylark. Consequently, in our view the current land use for agriculture and the existing public rights of way should be maintained in order to safeguard the area's high biodiversity value.

During recording for the national Bird Atlas 2007-11, 54 species, (including nine S41 NERC Act), were confirmed breeding within the Elton Reservoir tetrad, one of the highest totals in Greater Manchester. An additional 12 species were possible or probable breeders. More recently, between 2014 and 2018 seven protected species (Schedule 1 Wildlife and Countryside Act 1981 as amended) have been present during the breeding season of which three have been confirmed breeders. In addition, 22 priority species (S41 NERC Act) have been observed, as well as additional Red-listed and Amber-listed species (Birds of Conservation Concern 4).

As well as its breeding birds, the site is an important stop-off point for migrants moving through the Irwell Valley on spring and autumn passage. The proposed loss of a significant proportion of the terrestrial habitats, and the cover provided by hedgerows and scrub, will reduce its suitability for migrants and force birds to fly further to find alternative sites which are already in short supply along the Irwell corridor. In 2015, Elton Goyt SBI was the second most important site in GM for both wintering Common Snipe (Birds of Conservation Concern Amber-listed species) and Jack Snipe, and the wider Elton Reservoir area also achieved the same rank for Common Snipe in 2016. Elton Reservoir SBI is one of the top ten sites in GM and the second most important site in Bury (after Heaton Park Reservoir), for wintering Goosander, Tufted Duck and Wigeon.

The proposed development appears to be based on land ownership rather than any intrinsic merit, and if given the go-ahead will result in a long-term negative impact on Bury's biodiversity. The creation of an urban park around the proposed housing development will not compensate for the loss of important UK/GM Biodiversity Priority habitats. Given that policy GM-G10 states "Across the plan as a whole, a net enhancement of biodiversity resources will be sought" ... we would strongly recommend that alternative locations are considered to meet the district's housing needs which have a minimal impact on biodiversity. One option worth investigating would be a land swap with the current major land owner, so the important habitats around Elton Reservoir can be transferred to an organisation with the necessary expertise to draw up and deliver a long-term management plan to enhance and manage sensitively this area for future generations to enjoy and learn about its special wildlife.

Many local residents already enjoy access to the area and so the justification for the development in terms of increasing access to green space is not plausible. Nor is there any need to "make provision for a large amount of new and upgraded multi-functional green infrastructure throughout the area, including the enhancement of the existing assets at Elton and Withins Reservoirs and the Manchester, Bolton and Bury Canal". The existing Sites of Biological Importance selected by the Greater Manchester Ecology Unit and approved by Bury Local Planning Authority already fulfil this function, as well as playing a key role in nature conservation.

The proposed allocation does not comply with the following GMSF policies:

GM-G2 on Green Infrastructure, especially regarding clause 2 Enhance biodiversity by expanding, improving and connecting habitats.

GM-G3 on River Valleys and Waterways, especially regarding clause 1 - Retain the remaining open character of the river valleys, avoiding their fragmentation and prominent development on valley edges; clause 3 Protect and enhance the mosaic of semi-natural habitats including ... wet and semi-natural grassland; meadow; and lakes and ponds.

GM-G10 A Net Enhancement of Biodiversity and Geodiversity, especially regarding: Clause 1 - Increasing the quality, quantity, extent and diversity of habitats ...

Clause 2 – Improving connections between habitats ... that enable the movement of species, especially as the climate changes.

Clause 3 – Enhancing the management of existing habitats avoiding habitat fragmentation ...

Clause 4 – PROTECTING sites designated for their nature conservation ... importance ...

The proposed allocation states: "Development at this site will be required to:

11. Minimise impacts on and provide net gains for biodiversity assets within the site" Given the relatively small area of the site, this requirement and the retention of the existing Sites of Biological Importance is clearly not compatible with the construction of around 3,500 houses and "significant new and improved highways infrastructure." However, the retention of the SBIs would obviate the need for the provision of a large amount of new, upgraded and publicly accessible green

infrastructure." The ecosystems of the Elton Reservoir SBI and those in the surrounding area form a rich, interconnected network which has developed over many years and cannot simply be replaced by new habitats which would undoubtedly be of lower biodiversity value and so would not achieve net gain.

In summary, our view is that the sheer scale of the proposed GMSF allocations will not only have a massively negative impact on biodiversity in Greater Manchester, and potentially negate many of the achievements of the past thirty years in restoring former industrial sites and creating a greener and more biodiverse environment, it will also reduce the quality of life of the hundreds of thousands of people who currently enjoy access to green spaces within walking distance of where they live and whose health and well being is greatly enhanced through daily contact with nature. We would urge the Greater Manchester Combined Authority to prepare an alternative vision for the future of our city region which places much greater emphasis on the importance of the green infrastructure network in delivering a sustainable future for all local people, and focuses on the economic benefits that could be delivered by protecting and promoting the sustainable use of our rich natural heritage.

Yours faithfully

Ian McKerchar
Greater Manchester County Bird Recorder / Chairman Greater Manchester Bird Recording Group

Appendix 1 – Greater Manchester Bird Recording Group

The Greater Manchester Bird Recording Group was established in 2002 to promote the recording and conservation of wild birds across the ten districts of Greater Manchester. The Group currently has over 70 members, made up of local bird recorders who have many years' combined experience of recording, and in-depth knowledge of their local sites. Our database currently holds 870k records and is the most authoritative and comprehensive source of information on the abundance, distribution and status of wild birds in Greater Manchester.

The species records collected by our members have for many years been supplied to the Greater Manchester Ecology Unit and used to identify and select Sites of Biological Importance, as well as informing GMEU's responses to planning applications. GMEU has made extensive use of our data to prepare its contribution to the draft GMSF, identifying the key areas which make up the priority green infrastructure underpinning the ecological network. It is our understanding, and the main reason why our voluntary recorders devote so many hours of their free time to recording and submitting their records, that these areas would be protected under both district local plans and the GMSF to ensure that Greater Manchester remains an ecologically rich and diverse area, and that by 2035 the abundance and distribution of species, as well as the extent of UK priority/Greater Manchester Biodiversity habitats would be similar to what they are today in line with Natural England's 2020 Biodiversity Target.

Upload supporting information about this allocation:

No file was uploaded

85 Bury - GM Allocation 8: Seedfield

Not Answered

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

86 Bury - GM Allocation 9: Walshaw

Not Answered

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

87 Do you have any further comments on the overall proposals for Bury, including strategic transport interventions?

Context comments:

11g Salford

111 Salford - GM Allocation 30: Land at Hazelhurst Farm

Not Answered

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

112 Salford - GM Allocation 31: East of Boothstown

Not Answered

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

113 Salford: GM Allocation 32 - North of Irlam Station

Disagree

Please explain your answer:

We are extremely concerned that this area of Irlam Moss which is an integral part of the wider Chat Moss landscape is being proposed for development. The allocation site itself has been monitored for over 20 years by one of the most experienced bird recorders in Greater Manchester who has identified its importance for farmland birds which are used by DEFRA as a key indicator of the health of the countryside. The loss of this area to development would have a significant negative impact on farmland bird populations in both Salford and Greater Manchester, many of which have already suffered major declines in their abundance and distribution over the past thirty years, both nationally and locally. Many of the birds which breed and winter on this area of Irlam Moss, including Grey Partridge, Lapwing, Linnet, Skylark and Yellowhammer, are Species of Principal Importance under the Natural Environment and Rural Communities Act 2006. Natural England identified "protecting and enhancing England's S41 species [as] the key to achieving outcome 3 of the UK government's Biodiversity 2020 Strategy which targets "an overall improvement in the status of our wildlife."

In addition, the land around Prospect Grange farm regularly supports a wintering roost of Common Snipe (Birds of Conservation Concern Amber-listed) and Jack Snipe. In winter 2017-18 these fields were the third most important site in Greater Manchester for Common Snipe and the fifth for Jack Snipe. We would urge the Greater Manchester Combined Authority and Salford City Council to give due consideration to their statutory duty under the Natural Environment and Rural Communities Act to "have regard to conserving biodiversity as part of your policy of decision making."

The proposed development does not comply with Policy GM-G10 A Net Enhancement of Biodiversity and Geodiversity.

Clause 7 "Supporting the implementation of the Great Manchester Wetlands Nature Improvement Area (NIA) as an essential network of wildlife corridors linking biodiversity across the landscape". This proposed allocation falls within the NIA and it is our view that sites of high ecological value, such as this, should be protected from development, as the loss of these areas, especially in combination with other allocations, has the potential to undermine the viability of the NIA which has been selected to function as an integrated ecological network.

Clause 8 "Safeguarding, restoring and sustainably managing Greater Manchester's most valuable soil resources, particularly to ensure protection of peat-based soils and safeguard 'best and most versatile' agricultural land. This area has a peat-based soil and should be protected especially with regards to policy GM-G4 on Lowland Wetland and Mosslands which states: Clause 2 "Manage and restore the remnant pockets of lowland raised bog, including through restoration from farmland, ... to contribute to important functions such as flood risk management and carbon sequestration."

As a general principle we believe development should be avoided on all peat-based soils to comply with Strategic objective 7 on resilience and carbon neutrality, especially given the GMCA's commitment to "Promote carbon neutrality of new developments." The removal of peat from this site prior to development commencing would contravene Carbon and Energy Policy GM-S 2, clause 6: "Increasing carbon sequestration through the restoration of peat-based habitats, woodland management and tree-planting."

In conclusion, we would request that an alternative site should be considered for the proposed 1600 dwellings outside of the Great Manchester Wetlands NIA, in an area of low ecological value.

Upload supporting information about this allocation:

No file was uploaded

114 Salford - GM Allocation 33: Port Salford Extension

Disagree

Please explain your answer:

We are extremely concerned that this area of Barton Moss which is an integral part of the wider Chat Moss ecological network is being proposed for development. The allocation site itself has been monitored for over 20 years by one of the most experienced bird recorders in Greater Manchester who has identified its importance for farmland birds which are used by DEFRA as a key indicator of the health of the countryside. The loss of this area to development would have a significant negative impact on farmland bird populations in both Salford and Greater Manchester, many of which have already suffered major declines in their abundance and distribution over the past thirty years, both nationally and locally. Many of the birds which breed and winter on this area of Barton Moss, including Grey Partridge, Lapwing, Linnet, Skylark, Willow Tit and Yellowhammer, are Species of Principal Importance under the Natural Environment and Rural Communities Act 2006. Natural England identified "protecting and enhancing England's S41 species [as] the key to achieving outcome 3 of the UK government's Biodiversity 2020 Strategy which targets "an overall improvement in the status of our wildlife."

We would urge the Greater Manchester Combined Authority and Salford City Council to give due consideration to their statutory duty under the Natural Environment and Rural Communities Act to "have regard to conserving biodiversity as part of your policy of decision making."

The allocation policy states that "development of this site will be required to:

13. Support the objectives of the Great Manchester Wetlands Nature Improvement Area and avoid harm to protected species." Development of the site is quite clearly not compatible with the NIA objectives and no reference is made to protecting priority (S41) species including those listed above. The land has the potential to be restored for nature conservation which would support the NIA objectives.

The proposed development does not comply with Policy GM-G10 A Net Enhancement of Biodiversity and Geodiversity.

Clause 7 "Supporting the implementation of the Great Manchester Wetlands Nature Improvement Area as an essential network of wildlife corridors linking biodiversity across the landscape". This proposed allocation falls within the NIA and it is our view that sites of high ecological value, such as this, should be protected from development, as the loss of these areas, especially in combination with other allocations, has the potential to undermine the viability of the NIA which has been selected to function as an integrated ecological network.

Clause 8 "Safeguarding, restoring and sustainably managing Greater Manchester's most valuable soil resources, particularly to ensure protection of peat-based soils and safeguard 'best and most versatile' agricultural land. This area has a peat-based soil and should be protected especially with regards to policy GM-G4 on Lowland Wetland and Mosslands which states: Clause 2 "Manage and restore the remnant pockets of lowland raised bog, including through restoration from farmland, ... to contribute to important functions such as flood risk management and carbon sequestration."

As a general principle we believe development should be avoided on all peat-based soils to comply with Strategic objective 7 on resilience and carbon neutrality, especially given the GMCA's commitment to "Promote carbon neutrality of new developments." The removal of peat from this site prior to development commencing would contravene Carbon and Energy Policy GM-S 2, clause 6: "Increasing carbon sequestration through the restoration of peat-based habitats, woodland management and tree-planting."

The allocation policy also states:

"14. Protect and enhance surrounding habitats, including the Foxhill Glen Site of Biological Importance." This SBI was largely destroyed by the construction of a new access road at Barton Aerodrome, so this statement is clearly misleading and does raise questions about the credibility of any of the other "commitments" to enhance and protect the natural environment on this site. In particular, clause 16. "Minimise the loss of the carbon storage function of the peat and avoid any adverse effects on the hydrology on surrounding areas of peat/mossland."

Upload supporting information about this allocation:

No file was uploaded

115 Do you have any further comments on the overall proposals for Salford, including strategic transport interventions?

Context comments:

11j Trafford

129 Trafford - GM Allocation 45: New Carrington

Disagree

Please explain your answer:

We are extremely concerned that this area of Carrington Moss is being proposed for development. The allocation site itself has been well monitored for many years by experienced recorders who have identified the area's importance for farmland birds which are used by DEFRA as a key indicator of the health of the countryside. The loss of this large area to development would have a significant negative impact on farmland bird populations in both Trafford and Greater Manchester, many of which have already suffered major declines in their abundance and distribution over the past thirty years, both nationally and locally. Many of the birds which breed and winter on this area of Carrington Moss, including Grey Partridge, Lapwing, Linnet, Skylark, Willow Tit and Yellowhammer, are Species of Principal Importance under the Natural Environment and Rural Communities Act 2006. Natural England identified "protecting and enhancing England's S41 species [as] the key to achieving outcome 3 of the UK government's Biodiversity 2020 Strategy which targets "an overall improvement in the status of our wildlife."

In addition, the Wetland at Carrington Moss SBI, is a site of county importance for wetland birds which in the recent past has supported two protected (Schedule 1 Wildlife and Countryside Act 1981, as amended) breeding species. The wetland should be extended onto the agricultural land to the south of the SBI and managed as a nature reserve by an organisation with the necessary expertise. This would ensure that clauses 18 and 20 of the allocation policy are achieved. It would also enable local residents to connect with nature. The development should be restricted to the footprint of the former Basell Polyolefins industrial facility.

We would urge the Greater Manchester Combined Authority and Trafford Council to give due consideration to their statutory duty under the Natural Environment and Rural Communities Act to "have regard to conserving biodiversity as part of your policy of decision making."

The proposed development does not comply with Policy GM-G10 A Net Enhancement of Biodiversity and Geodiversity.

Clause 7 "Supporting the implementation of the Great Manchester Wetlands Nature Improvement Area (NIA) as an essential network of wildlife corridors linking biodiversity across the landscape". This proposed allocation falls within the NIA and it is our view that sites of high ecological value, such as this, should be protected from development, as the loss of these areas, especially in combination with other allocations, has the potential to undermine the viability of the NIA which has been selected to function as an integrated ecological network.

Clause 8 "Safeguarding, restoring and sustainably managing Greater Manchester's most valuable soil resources, particularly to ensure protection of peat-based soils and safeguard 'best and most versatile' agricultural land. This area has a peat-based soil and should be protected especially with regards to policy GM-G4 on Lowland Wetland and Mosslands which states: Clause 2 "Manage and restore the remnant pockets of lowland raised bog, including through restoration from farmland, ... to contribute to important functions such as flood risk management and carbon sequestration."

As a general principle we believe development should be avoided on all peat-based soils to comply with Strategic objective 7 on resilience and carbon neutrality, especially given the GMCA's commitment to "Promote carbon neutrality of new developments." The removal of peat from this site prior to development commencing would contravene Carbon and Energy Policy GM-S 2, clause 6: "Increasing carbon sequestration through the restoration of peat-based habitats, woodland management and tree-planting."

Upload supporting information about this allocation:

No file was uploaded

130 Trafford - GM Allocation 46: Timperley Wedge

Not Answered

Please explain your answer:

Upload supporting information about this allocation:

No file was uploaded

131 Do you have any further comments on the overall proposals for Trafford, including strategic transport interventions?

Context comments: