



Ian Mckerchar
County Bird Recorder, Greater Manchester
42 Green Avenue, Astley,
Greater Manchester. M29 7EH
Tel. 01942 701758 Mobile: 07958 687481
E-mail: gmbirdrg@gmail.com

GREATERT MANCHESTER BIRD RECORDING GROUP

Planning Team Consultation
GMCA
Churchgate House
56, Oxford Street
Manchester
M1 6EU

Date: 17th March 2019

Dear Planning Team,

Re: GMSF Consultation Revised Draft January 2019 - Objection to Policy GM Allocation 7 Elton Reservoir (Bury)

Question 55 - We strongly agree with and wholeheartedly support the proposed policy on the Net Enhancement of Biodiversity.

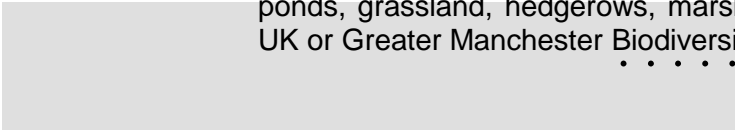
Question 84
Do you agree with the proposed policy GM Allocation 7: Elton Reservoir?

Answer - Disagree

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 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 list 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 assessed 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.