

Places for Everyone Representation 2021

<b>Family Name</b>	Atkins
<b>Given Name</b>	Stephen
<b>Company / Organisation</b>	Greater Manchester Bird Recording Group
<b>Person ID</b>	1287576
<b>Title</b>	Stakeholder Submission
<b>Type</b>	Web
<b>Family Name</b>	Atkins
<b>Given Name</b>	Stephen
<b>Company / Organisation</b>	Greater Manchester Bird Recording Group
<b>Person ID</b>	1287576
<b>Title</b>	JPA 1.1 Heywood / Pilsworth (Northern Gateway)
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	Yes
<b>Compliance - In accordance with the Duty to Cooperate?</b>	Yes
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	<p>We are extremely concerned, that this extensive area comprising 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 8.2 page 149) published in the Places for Everyone consultation. The allocation also includes the Pilsworth Site of Biological Importance which should be protected, as well as the land surrounding it. The site allocation process appears to be developer led and has given little consideration to the ecological importance of this area.</p> <p>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 as a whole, 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 (NERC) Act 2006. 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.</p>
<b>Redacted modification - Please set out the modification(s) you</b>	Many of the proposed 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

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<b>consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	type is permitted until future needs are clearly established and unless those already granted planning permission will reach capacity before 2037. 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.
<b>Family Name</b>	Atkins
<b>Given Name</b>	Stephen
<b>Company / Organisation</b>	Greater Manchester Bird Recording Group
<b>Person ID</b>	1287576
<b>Title</b>	JPA 1.2: Simister and Bowlee (Northern Gateway)
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	Yes
<b>Compliance - In accordance with the Duty to Cooperate?</b>	Yes
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	Breeding bird surveys were carried out in this area in spring 2020 by the GM Bird Recording Group and identified a breeding population of 20 pairs of Lapwings which is of both district and county importance. These birds nest on the arable land in the spring sown cereal crops between Simon Land and Blueball Lane. Lapwing is listed as a Species of Principal Importance under the NERC Act and Red-listed under Birds of Conservation Concern 4 with the NW England population having undergone a decline of 25% between 1995 and 2018, so should be treated as a conservation priority when GM's Nature Recovery Networks are established.
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	Find an alternative site of low ecological value
<b>Family Name</b>	Atkins
<b>Given Name</b>	Stephen
<b>Company / Organisation</b>	Greater Manchester Bird Recording Group
<b>Person ID</b>	1287576
<b>Title</b>	JPA 2: Stakehill

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Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes
Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.	<p>We are extremely concerned, that this area comprising mainly farmland is being proposed for development. The site allocation process appears to have given little consideration to the ecological importance of this area.</p> <p>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 Section 41 NERC Act species: Dunnock, House Sparrow, Lapwing, Linnet, Reed Bunting, Skylark, Song Thrush and Starling.</p>
Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.	Find an alternative site of low ecological value.
Family Name	Atkins
Given Name	Stephen
Company / Organisation	Greater Manchester Bird Recording Group
Person ID	1287576
Title	JPA 7: Elton Reservoir Area
Type	Web
Soundness - Positively prepared?	Unsound
Soundness - Justified?	Unsound
Soundness - Consistent with national policy?	Unsound
Soundness - Effective?	Unsound
Compliance - Legally compliant?	Yes
Compliance - In accordance with the Duty to Cooperate?	Yes

**Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.**

The Greater Manchester Bird Recording Group objected to this allocation in our response to both the first (January 2017) and second (March 2019) Greater Manchester Spatial Framework (GMSF) allocations. As the Places for Everyone plan is substantively unchanged, as far as this allocation is concerned, our comments remain generally 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, the site allocation process appears to be developer led and has given little consideration to the ecological importance of the 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 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 and Greater Manchester'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 (GMSF 2019) 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

	<p>landowner, 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.</p> <p>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.</p>
<p><b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b></p>	<p>The proposed allocation does not comply with the following policies:</p> <p>JP-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 <input type="checkbox"/> wet and semi-natural grassland; meadow; and lakes and ponds.</p> <p>JP-G9 A Net Enhancement of Biodiversity and Geodiversity, especially regarding: Clause 1 - Increasing the quality, quantity, extent and diversity of habitats <input type="checkbox"/> Clause 2 - Improving connections between habitats <input type="checkbox"/> that enable the movement of species, especially as the climate changes.</p> <p>Clause 3 - Enhancing the management of existing habitats <input type="checkbox"/>. avoiding habitat fragmentation <input type="checkbox"/></p> <p>Clause 4 - PROTECTING sites designated for their nature conservation <input type="checkbox"/> importance <input type="checkbox"/></p> <p>The Policy JP allocation 7 states: "Developments within this allocation will be required to:</p> <p>13. Minimise impact 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';"</p> <p>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 initial proposed construction of around 1,900 houses (potentially increasing to 3500) and 'delivery of highways infrastructure.'" However, the retention of the SBIs would obviate the need for the provision of 'new, high quality and publicly accessible open space/parkland' 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 'open space/parkland' which would undoubtedly be of lower biodiversity value and so would not deliver on site net gain.</p> <p>Elton Reservoir and the associated SBIs should be retained as a core area for biodiversity and must be a key component in Bury and GM's LNRS. The location of these SBIs adjacent to the River Irwell wildlife corridor makes them a vital link in Bury and GM's Nature Recovery Network.</p>
<b>Family Name</b>	Atkins
<b>Given Name</b>	Stephen
<b>Company / Organisation</b>	Greater Manchester Bird Recording Group
<b>Person ID</b>	1287576
<b>Title</b>	JPA 28: North of Irlam Station
<b>Type</b>	Web

<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	Yes
<b>Compliance - In accordance with the Duty to Cooperate?</b>	Yes
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	<p>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 listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006.</p> <p>In addition, the land around Prospect Grange farm regularly supports a wintering roost of Common Snipe (Amber-listed under Birds of Conservation Concern 4) 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 (SCC) to give due consideration to their statutory duties under the Natural Environment and Rural Communities Act to "have regard to conserving biodiversity as part of your policy of decision making." In addition, in the near future, SCC will be required under the new Environment Act to draw up a district LNRS which will be legally binding. The high ecological value of the allocation should ensure its inclusion in Salford's future Nature Recovery Network.</p>
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	<p>The proposed development does not comply with Policy JP-G9 A Net Enhancement of Biodiversity and Geodiversity.</p> <p>Clause 6 'Supporting the development and implementation of the Great Manchester Wetlands Nature Recovery Network.' 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.</p> <p>Clause 7 'Safeguarding, restoring and sustainably managing our 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 JP-G4 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.'</p> <p>As a general principle, we believe development should be avoided on all peat-based soils to comply with the 25 Year Environment Plan objectives, Chapter 1: Using and managing land sustainably and especially given the GMCA's commitment to 'Promote carbon neutrality of new developments.'</p>

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	<p>The removal of peat from this site prior to development commencing would contravene Carbon and Energy Policy JP-S 2, clause 6: 'Increasing carbon sequestration through the restoration of peat-based habitats, woodland management and tree-planting.'</p> <p>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.</p>
<b>Family Name</b>	Atkins
<b>Given Name</b>	Stephen
<b>Company / Organisation</b>	Greater Manchester Bird Recording Group
<b>Person ID</b>	1287576
<b>Title</b>	JPA 29: Port Salford Extension
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	Yes
<b>Compliance - In accordance with the Duty to Cooperate?</b>	Yes
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	<p>This area of Barton Moss 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 (NERC) Act 2006.</p> <p>We would urge the Greater Manchester Combined Authority and Salford City Council to give due consideration to their statutory duties under the NERC Act to "have regard to conserving biodiversity as part of your policy of decision making."</p> <p>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." We stated in our March 2019 response that "Development of the site is quite clearly not compatible with the NIA objectives" The land has the potential to be restored for nature conservation which would support the NIA objectives.</p>
<b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the</b>	<p>The proposed development does not comply with Policy JP-G9 A Net Enhancement of Biodiversity and Geodiversity.</p> <p>Clause 6 'Supporting the development and implementation of the Great Manchester Wetlands Nature Recovery Network.' This proposed allocation falls within the NIA and it is our view that sites of high ecological value, such</p>

<b>plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b>	<p>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.</p> <p>Clause 7 'Safeguarding, restoring and sustainably managing our 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 JP-G4 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.'</p> <p>As a general principle, we believe development should be avoided on all peat-based soils to comply with the 25 Year Environment Plan objectives, Chapter 1: Using and managing land sustainably and 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 JP-S 2, clause 6: 'Increasing carbon sequestration through the restoration of peat-based habitats, woodland management and tree-planting.'</p> <p>In conclusion, we would request that an alternative site should be considered for the proposed development outside of the Great Manchester Wetlands NIA, in an area of low ecological value.</p>
<b>Family Name</b>	Atkins
<b>Given Name</b>	Stephen
<b>Company / Organisation</b>	Greater Manchester Bird Recording Group
<b>Person ID</b>	1287576
<b>Title</b>	JPA 33 New Carrington
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	Unsound
<b>Soundness - Justified?</b>	Unsound
<b>Soundness - Consistent with national policy?</b>	Unsound
<b>Soundness - Effective?</b>	Unsound
<b>Compliance - Legally compliant?</b>	Yes
<b>Compliance - In accordance with the Duty to Cooperate?</b>	Yes
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	<p>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.</p>



	<p>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 breeding species listed under Schedule 1 of the Wildlife and Countryside Act 1981, as amended. As part of Trafford Council's Local Nature Recovery Strategy and Nature Recovery Network, we would recommend extending the wetland on to the agricultural land to the south of the SBI and for the whole area to be 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 on their doorstep. The proposed allocation should be restricted to the footprint of the former Basell Polyolefins industrial facility.</p> <p>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."</p>
<p><b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b></p>	<p>Supporting the development and implementation of the Great Manchester Wetlands Nature Recovery Network.' 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.</p> <p>Clause 7 'Safeguarding, restoring and sustainably managing our 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 JP-G4 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.'</p> <p>As a general principle, we believe development should be avoided on all peat-based soils to comply with the 25 Year Environment Plan objectives, Chapter 1: Using and managing land sustainably and 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 JP-S 2, clause 6: 'Increasing carbon sequestration through the restoration of peat-based habitats, woodland management and tree-planting.'</p> <p>In conclusion, we would request that an alternative site should be considered for the proposed development outside of the Great Manchester Wetlands NIA, in an area of low ecological value.</p>