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1st October 2021

To whom it may concern,

***Re*: *Places for Everyone* 2021 (Publication Stage Consultation)**

The Cheshire Wildlife Trust (CWT) is the leading conservation charity in the Cheshire and south Manchester areas that focusses on all aspects of wildlife.

The Wildlife Trust for Lancashire, Manchester and North Merseyside was founded in 1962. Originally covering the historic County Palatine of Lancaster, we have grown to be the largest nature conservation body in England's northwest. We continue to act for nature's recovery across seven of Greater Manchester's ten districts, with our sister wildlife trust covering Stockport, Tameside and Trafford.

As individual charities we are part of the confederal The Wildlife Trusts partnership, the UK's leading natural environment charity dedicated to nature's recovery on land and at sea.

In this joint response to the consultation on the "*Places for Everyone*" publication draft August 2021 (hereafter referred to as 'PfE' or 'the Plan') we seek to represent the interests of Cheshire Wildlife Trust's 13,000+ local members and The Wildlife Trust for Lancashire, Manchester & North Merseyside's 28 000+ members; particularly those who live or work within, or visit Greater Manchester. We shall refer to ourselves throughout as "the Trusts" except where it may be appropriate to make an individual distinction, *e.g.* based on local administrative geography.

General Comments

The Trusts welcome, in principle, many of the PfE Plan policies such as those covering biodiversity, climate change and green infrastructure. However, we are concerned that when read as a whole the Plan and its supporting evidence place a much greater emphasis on the economic and social objectives of sustainable development, as opposed to the equally important environmental objective as per the NPPF Para 8c.

Our concerns about the soundness of PfE focus mainly on the following issues (in summary):

1. The Plan's overall impact on and resultant effects to biodiversity;

2. The Plan allocation site selection process and the resulting impacts on biodiversity;
3. The Plan allocations in the context of the net zero 2038 target, and;
4. The Plan's support for HS2.

We are also concerned that the major growth proposed at Manchester Airport and the more general focus of planned economic development on the GM motorway network that will potentially impact upon the achievement of the stated climate change and air quality objectives.

Allocation Site Selection

We are concerned that the process for selecting sites for allocation has downplayed the role of environmental matters leading to many of the allocations being unsound (see our detailed comments on Chapter 11 - Allocations below). For example, we are astonished that the criteria used to identify the initial areas of search for site allocations in the Green Belt[1] failed to include the relative contribution that areas make to the purposes of the Green Belt[2] or the protection of environmental assets (e.g. designated sites of nature conservation, high-grade agricultural land, peatlands etc.). We believe that these issues should have been central considerations from the outset, rather than later in the process. This failure has resulted in major conflicts with the proposed policies in Section 8 of PfE – Greener Places.

In general, there is a concerning lack of ecological information to justify the selection of allocations, and what little information is available appears to vary significantly across each allocation site. There needs to be a robust demonstration that important ecological features that are likely to be affected by the development of an allocation have been identified and that the harm avoidance mitigation hierarchy (NPPF Para 180a) has been applied. While some environmental constraints have been avoided (namely internationally designated sites for nature conservation), many other potential impacts to important ecological features (both nationally and locally significant) have not been avoided and even appear to have been assumed to be mitigatable without any evidence to base this assumption on. This is a highly unsound approach as, once the plan allocations have been approved and adopted, the presumption will be in favour of the development of these sites despite them being inconsistent with NPPF policies (such as NPPF Para 179b and other NPPF natural environment policies).

An example of this across many of the allocation sites is the seemingly ubiquitous exclusion of consideration for Section 41 priority ground nesting bird species such as curlew, lapwing and skylark. These rapidly declining species require highly specialised farmland habitats to successfully breed, yet their presence (which we have raised in our detailed comments on Chapter 11 - Allocations below) and the potential for them to suffer nationally significant impacts has either not been considered at all, or has been assumed to be mitigatable without any evidence on which to base this assumption. These highly specialised species require highly specialised mitigation, generic habitat creation such as tree planting or hedgerow laying will not suffice to mitigate significant residual negative effects. This is unacceptable and the proposed allocations must be revised to demonstrate, rather than assume, compliance with the NPPF, particularly in regard to protected and priority species and other important environmental assets.

Impact on Biodiversity

[1] Page 18 of "Places for Everyone: Site Selection Background Paper July 2020"
[2] Having regard to the purposes of Green Belt set out in para. 138 of the NPPF

Whilst PfE now contains a smaller release of Green Belt than earlier versions, it will nevertheless result in very significant additional urban sprawl and a reduction in important ecological stepping stones and semi-natural green spaces which exist between urban areas. We are extremely concerned that, despite the Plan policies seeking to improve green infrastructure and biodiversity, the overall effect will be the deterioration of important semi-natural habitats, a reduction in the coherence of the existing green infrastructure network, a weakened resilience to (and ability to mitigate against) the effects of climate change and reduced access to nature for the residents of Greater Manchester. This is particularly pertinent across a number of the proposed allocations which we deem to be unsound due to contradictions with PfE Policies and the NPPF.

While we generally welcome the reduction in Green Belt release and the preference for brownfield land to be developed over greenfield sites, we have some concern regarding the lack of acknowledgement in the plan that previously developed land (PDL) can be an extremely important habitat for nationally rare and declining species assemblages. While the NPPF is explicit that PDL (treated as synonymous with brownfield) should be prioritised for development, it is only applicable to brownfield sites where this would not conflict with other policies in the NPPF. This includes causing harm to designated sites of importance for biodiversity (NPPF Para. 119) and therefore, by default, any currently undesignated site that would qualify for designated status (*i.e.* meeting the GM criteria for selection of a Site of Biological Importance - SBI).

Net Zero 2038 Target

The Trusts would like confirmation of whether greenhouse gas emissions (GHG) associated with the land use, land use change and forestry (LULUCF) national inventory report category for the development of allocations located on deep peat soils have been included within the net zero 2038 target. LULUCF is defined by the United Nations Climate Change Secretariat as a greenhouse gas inventory sector that covers emissions and removals of greenhouse gases resulting from direct human-induced land use such as settlements and commercial uses, land-use change, and forestry activities.

As well as the permanent loss of a finite ecosystem service asset (with the potential to act as a carbon sink for many hundreds or thousands of years if managed correctly), allocations that require the removal or modification of a peat body (regardless of its condition *e.g.* degraded or relict) to facilitate development will result in significant GHG emissions which are highly likely to undermine the GM net zero 2038 target. Rather than allocate areas of deep peat for development, the Trusts believe these important natural capital assets should be left in the ground and protected, restored and managed to provide alternative benefits to the residents of GM and the wider region.

This approach falls in line with the findings and recommendations of a number of published national and regional strategies including; the England Peat Action Plan (DEFRA)[3], the Climate Change Committee's Sixth Carbon Budget[4], the GM Local Nature Recovery Strategy (LNRS) Pilot and the NPPF (Para 120b).

The financial implications of peatland restoration should not be a barrier to their restoration; it is clear the economic benefits of peatland restoration exceed the costs. The ONS estimate that the cost of restoring all UK peatlands to near natural condition would range from £8.4 - £21.3 billion while delivering carbon benefits of £109 billion alone, outweighing the costs of doing so by 5 to 10

[3] Department for Environment, Food & Rural Affairs (DEFRA) (2021) England Peat Action Plan. [https://www.gov.uk/government/publications/england-peat-action-plan]
[4] Climate Change Committee (CCC) (2020) Sixth Carbon Budget: The UK's Path to Net Zero. Climate Change Committee.

times (DEFRA England Peat Action Plan). When considered alongside the provision of additional ecosystem services, such as flood management, water quality and improved biodiversity, peatland restoration provides very high value for money green infrastructure improvement.

HS2

The Trusts are extremely concerned about the degree of reliance that the Plan places on the delivery of HS2 in its currently proposed form. The Trusts have objected in the strongest possible terms to HS2 (phase 2B) due to the disastrous impact that it will have on biodiversity. This includes the destruction of irreplaceable habitats, failure to set out effective mitigation and compensation and failure to set out effective proposals for measurable net gains in biodiversity. As we have previously stated, the alignment and scheme design of HS2 phase 2B will require a full redesign if it is to comply with relevant national policy and meet strengthened forthcoming legal duties concerning biodiversity, as set out in the forthcoming Environment Bill. We therefore consider those aspects of the Plan which rely on the delivery of HS2 as currently proposed to be unsound.

Although the projected route through Trafford Borough to a terminus in Manchester City is covered by PfE, we are surprised that HS2 Phase 2b's "Golborne Link', which is projected to cross the Wigan Borough sector of Great Manchester Wetlands Nature Improvement Area on its way to join the West Coast Main Line at Bamfurlong, is not mentioned at all, despite the UK Government's and HS2 Ltd's recent commitment to biodiversity net gain on this stretch also; see: https://questions-statements.parliament.uk/written-questions/detail/2021-06-15/16079. This is something that we would expect PfE to specifically address in combined authority planning policy on HS2.

Detailed Comments

Chapter 1 – Introduction

Para 1.32

This paragraph confirms that the area around the airport will be a key growth area for jobs. As stated earlier we are not convinced that a strategy which relies on airport growth of the scale expected is consistent with climate change objectives.

Para 1.34

The Trusts note that the amount of employment land identified in the PfE Plan area has been reduced since the 2016 GMSF. However, the method for estimating future employment land needs is still largely based upon extrapolating forward past trends[5]. Given the urgent need for systemic change to tackle the biodiversity and climate emergencies, we are not convinced that this approach is justified.

Para. 1.39

The Trusts welcome the intention stated here to protect the "most valuable green spaces" and improve them by delivering a net gain in biodiversity and developing a Local nature Recovery Strategy. However, we consider that the paragraph should be strengthened to reflect the ambition to enhance green infrastructure across the City Region, and to deliver a substantial and widespread net gain in biodiversity. We recommend changing sentence two of para. 1.39:

> "Connection to high quality and well managed green infrastructure is key – we are seeking to *radically enhance the quality of greenspace across the City Region,* protect our most valuable green spaces and *deliver a substantial, measurable and widespread net gain in biodiversity* ~~improve them by delivering a net gain in biodiversity assets~~".

[5] "Places for Everyone Employment Topic Paper", July 2021 – section 4

Para 1.40

The penultimate sentence correctly refers to the "*significant policy protection*" which applies to areas of green infrastructure in the Green Belt. However, whilst we accept that sites in the Green Belt are subject to their own specific policy tests, it should be made clearer in this paragraph that all parts of the strategic green infrastructure network (i.e. not just areas which fall within the Green Belt) will generally be protected from development. We recommend revising the last three sentences of para. 1.40:

> "Our strategic Green Infrastructure network is extensive. Around 60% is within the Green Belt and therefore is afforded significant policy protection. The remaining 40% does not meet the tests of Green Belt but ~~it is very important for the continued wellbeing of our boroughs.~~ *will also be protected from development unless specific exceptions set out in national or local policy apply*."

Para. 1.41 to 1.46

The Trusts welcome, in general terms, the preference for brownfield land to be developed over greenfield sites. However, we have major concerns about the level of encroachment still proposed into the countryside. It should be noted that brownfield sites can themselves have valuable biodiversity interests on them which should be protected and also act as key ecological corridors and stepping stones contributing to a coherent and resilient ecological network. While the NPPF is explicit that previously developed land, treated as synonymous with brownfield, should be prioritised for development, it is only applicable to brownfield sites where this would not conflict with other policies in the NPPF, including causing harm to designated sites of importance for biodiversity (NPPF Para. 119) and therefore, by default, any currently undesignated site that would qualify for designated status (*i.e.* meeting the criteria for selection of a Site of Biological Importance - SBI).

Para 1.52

The Trusts support the commitment for GM to become carbon neutral by 2038, keep fossil fuels in the ground and the statement that the GM authorities will not support fracking at this time. We would also like to see a commitment to the protection and enhancement of key carbon storing semi-natural habitats, in particular peatlands, extending the pledge to keep fossil fuels in the ground to also cover peat. Any assessment of Greater Manchester's path to carbon neutrality that does not take account of the potential requirement for large scale peat extraction to facilitate development of a number of the proposed allocations would be highly inaccurate, disingenuous and undermine the aspiration of the combined authority to meet the target by 2038.

Chapter 2 – Context

Whilst this chapter mentions environmental issues in a few places we feel that these references need to be substantially strengthened. We are also astounded that paragraph 2.33 (which attempts to list the "key challenges" for the City Region) completely ignores the climate and biodiversity emergencies. We recommend that the references to environmental matters in Chapter 2 are strengthened substantially and that the climate and biodiversity emergencies are listed as key challenges in paragraph 2.33.

Para 2.14 to 2.16

This section and subsequent parts of the Plan seem to unquestioningly accept the case for large scale growth at Manchester Airport, without any real analysis of what this means for climate change. It should be made clear within this section that future growth at Manchester airport should be demonstrably consistent with the ambition (set out elsewhere in the Plan) to achieve net zero carbon emissions by 2038.

Para 2.23 to 2.28

The Trusts have objected in the strongest terms to the currently proposed scheme for HS2 phase 2B (see general comments). As a result, we are extremely concerned about the support set out here for HS2 in its current form. Whilst we do not object in principle to Northern Powerhouse Rail this must be designed from the outset to comply with the biodiversity harm avoidance, minimisation and mitigation hierarchy, and to achieve a genuine measurable net biodiversity gain in line with national policy. References to HS2 both here and elsewhere in the Plan should be substantially revised to reflect the need for a complete reconsideration of the design and alignment of the scheme. References to Northern Powerhouse Rail (in these paragraphs and/or elsewhere) should make it clear that this scheme must be designed from the outset to protect habitats and species and to deliver a substantial measurable net gain in biodiversity, including where it would traverse the Great Manchester Wetlands Nature Improvement Area.

Chapter 3 – Vision

Para 3.1

The Trusts welcome the commitments to address climate change and a flourishing natural environment. However, this paragraph should be strengthened by making a clearer commitment (consistent with other parts of the Plan) to deliver net zero carbon emissions growth. We recommend revising vision (bullet 5) to read:

> "A place ~~at the forefront of action on climate change~~ *which delivers net zero growth in carbon emissions* with clean air and a flourishing natural environment."

Objective 1

The first bullet of this objective which states "Increase net additional dwellings" is too vague and open ended. It should be qualified by linking the scale of housing development sought to the numbers needed:

- "~~Increase net~~ *Provide sufficient* additional dwellings *to meet needs*"

Objective 2 and 3

In line with our earlier comments on brownfield land, previously developed land should only be prioritised for development where this would not conflict with other policies in the NPPF, particularly in relation to conserving and enhancing the natural environment. The brownfield bullet point in both objectives should be amended:

- Prioritise the use of brownfield land *where this does not conflict with other policies in PfE or the NPPF*;

Objective 7

Despite our significant concerns around the uncertainties of how the proposed allocations contribute to the net-zero 2038 target, we largely welcome the references to carbon neutrality, sustainable patterns of development and infrastructure for cleaner vehicles. However, the words "promote" and "facilitate" are too vague and should be replaced by "deliver":

- "~~Promote~~ *Deliver* carbon neutrality of new development by 2028;
- ~~Promote~~ *Deliver* sustainable patterns of development that minimise the need to travel and contribute to cleaner air;
- Locate and design development to reduce car dependency;
- Facilitate *Deliver* provision of infrastructure for cleaner vehicles;
- Improve energy efficiency and the generation of renewable and low carbon energy."

Objective 8

We welcome the commitment to enhance biodiversity. However, this objective would be more effective if it were strengthened to ensure that a substantial and widespread net gain in biodiversity is achieved, we recommend revising the first bullet to read:

- "Enhance special landscapes, green infrastructure, biodiversity and geodiversity *while delivering a substantial and widespread net gain in biodiversity*"

Chapter 4 – Strategy

Para 4.1

This paragraph should refer to the ecological emergency as well as climate change. We recommend revising the final bullet to:

- "Creating places which will be more resilient to climate change *and address the ecological emergency*."

Para 4.8

This paragraph should refer to the need to enhance (as opposed to just protect) the environment. We recommend:

> "A key role of this Plan is to manage the conflicting demands on our finite land resources. The need for new housing, employment, facilities and infrastructure has to be accommodated, whilst at the same time protecting *and enhancing* the environment, urban green spaces, the countryside and the identity of different places."

Para 4.10

In line with our earlier comments on brownfield land:

> "An essential aspect of the efficient and effective use of land will be to prioritise the reuse of previously-developed (brownfield) land *(where this does not conflict with other policies in PfE or the NPPF)* when meeting development needs. This will help to address dereliction and bring investment into existing urban areas, supporting their regeneration and enhancement. Abnormal costs such as those associated with addressing land contamination can have a negative impact on the viability of developing brownfield sites, and so securing funding to support remediation will be a priority."

Policy JP-Strat 4 Port Salford

See our specific comments on Allocation policies covering this area**.**

Policy JP-Strat 5 Inner Areas

The Trusts broadly support this policy including its reference to high quality open space and improved access to the wider green infrastructure network. However, the need to protect and enhance the natural environment, referred to in paragraph 3, should apply to all new development (and not just where a mix of uses is proposed) and should therefore appear earlier in the policy. We recommend revising paragraph 2 and 3:

> "New development ~~will~~ *must* be of high quality, *be* predominantly~~,~~ residential (in a mix of size, type and tenure) *and protect and enhance the historic and natural environment*. It ~~will~~ *must also* be supported by necessary infrastructure, including high quality open space and improved access to the wider green infrastructure network, together with improved transport and social infrastructure."
>
> "Where a mix of uses is being proposed it will seek to protect the amenity of existing and new residents ~~and it will seek to protect and enhance the location's historic and natural environment and assets~~."

Policy JP-Strat 6 Northern Areas

See our specific comments on Allocation policies covering this area.

Policy JP-Strat 7 North-East Growth Corridor

See our specific comments on Allocation policies covering this area.

Policy JP-Strat 8 Wigan-Bolton Growth Corridor

See our specific comments on Allocation policies covering this area.

Policy JP-Strat 9 Southern Areas

In line with our earlier comments on brownfield land:

> The economic competitiveness, distinctive local neighbourhood character and environmental attractiveness of the southern areas will be protected and enhanced. There will be a strong emphasis on prioritising the re-use of brownfield land *(where this does not conflict with other policies in PfE or the NPPF)* and promoting the roles of the areas' town centres and its other key assets, including education and training facilities enabling people to gain access to employment opportunities. There will be an increase in the mix, type, quality and range of residential offer and a strengthening of its economic role. This will be complemented by improvements to transport connectivity, local character and the selective release of Green Belt in key locations.

The last sentence should be revised to make it clear that development must actually protect and enhance the natural environment, as opposed to merely seeking to identify opportunities to do so:

> "Development in these locations will be of good quality and design, supported by the necessary infrastructure and amenities and *must* ~~will seek to identify opportunities to~~ protect and enhance the natural and historic environments and to improve the local character."

Policy JP-Strat 10 Manchester Airport

We deem the current iteration of the Global Logistics PfE allocation to be unsound

The Trusts welcome the commitment set out in paragraph 4.67 for the airport to achieve "net zero carbon emissions" by 2038. However, we remain very sceptical about the deliverability of this ambition, particularly given the large-scale growth in air passenger and freight movements which is proposed. We also believe that the references to climate change in Policy JP-Strat 10 are too weak. It should be made clear that development which facilitates airport growth should only be supported if is shown to be consistent with achieving net zero carbon by 2038. We recommend:

> "Lying within the area and policy framework covered by JP-Strat 9 this policy seeks to maximise the benefits of the continued operation and sustainable growth of Manchester Airport and its surrounding locality. Development which is in line with:
>
> - Government policy
> - Manchester's Local plan policies ~~and~~
> - Manchester Airport Group's Corporate Social Responsibility Strategy *and*
> - *Is consistent with the goal of achieving carbon neutrality by 2038 in line with Policy JP-S2.*"

As per our earlier comments, we propose the inclusion of the High Speed 2 (HS2) safeguarded routes and proposed station at Davenport Green to be unsound. For additional

detail see our previous responses to the HS2 scheme[6]. The safeguarded routes and station incorporate Davenport Green Wood Site of Biological Importance (SBI) and Coroners Wood SBI. Both sites are designated for the presence of ancient woodland; an irreplaceable habitat as defined in the NPPF which will be lost as a result of the proposed routes. We also deem the current iteration of the Timperley Wedge and Global Logistics PfE allocations to be unsound (see our detailed comments on Chapter 11 - Allocations below). References to these allocation should be removed from this policy unless our comments are suitably addressed.

Policy JP-Strat 11 New Carrington

We deem the current iteration of the New Carrington PfE allocation to be unsound (see our detailed comments on Chapter 11 - Allocations below). This Policy should be removed entirely unless our comments are suitably addressed.

Policy JP-Strat 13 Strategic Green Infrastructure

We broadly support this policy however we are alarmed at the exclusion of any reference to grasslands within the listed strategic green infrastructure assets. The prevalence of species rich grassland has declined significantly over the last century, due mainly to expanding urbanisation and agriculture. As demonstrated in the DEFRA GM LNRS Pilot, there are significant areas of grassland enhancement opportunity across GM that can help to address and revise this trend. We recommend a specific grassland policy is included in the 'Greener Places' section (JP-G Policies) which can then be referenced in this policy as a GI asset to be protected and enhanced.

The second sentence of the existing policy should also be strengthened to refer to "habitats" as well as "sites" of ecological value, to make it clearer that protection does not just apply to designated sites. We recommend revising the second sentence of the policy:

> "The protection and enhancement of these key strategic green infrastructure assets is complemented by a suite of policies to protect and enhance our network of green infrastructure, including protecting and enhancing sites *and habitats* of ecological value…"

Policy JP-Strat 14 A Sustainable and Integrated Transport Network

See our earlier comments about HS2 and Northern Powerhouse Rail.

The Trusts are also concerned that, notwithstanding the Plan's support for sustainable transport, it also relies heavily on the provision of new road infrastructure and/or enhanced access to the motorway network to support its growth ambitions, particularly for employment sites but also some housing sites. Whilst we acknowledge that over the Plan period there will be an increase in the use of low emission vehicles, we are yet to be convinced that this approach will be consistent with achieving net zero by 2038.

Chapter 5 – Sustainable and Resilient Places

Para 5.4

We support the list of issues set out in paragraph 5.4. However, this list should also include tackling the biodiversity emergency. We recommend revising the last part of paragraph 5.4 as follows:

> "….following the waste hierarchy, reducing waste generation, using sustainable construction techniques, combating and adapting to climate change, reducing

[6] https://www.cheshirewildlifetrust.org.uk/HS2

carbon emissions to meet Greater Manchester's 2038 carbon neutrality target date, supporting high levels of economic growth in a way that can benefit all residents, *tackling the biodiversity emergency* and delivering sustainable patterns of development that minimise the need to travel and reliance on the car.

Policy JP-S 1 Sustainable Development

We support this policy in principle but consider that sentence 1 within it is confusingly worded. In particular it implies that all other sustainability issues are subordinate to the aim of tackling climate change. Whilst climate change is crucially important, other issues such as the biodiversity crisis are extremely important in their own right. The sentence is also weakened by the inclusion of the words "aim to" and "actively seek opportunities to" which are vague and reduce the effectiveness of the policy. We recommend revising sentence 1 of policy JP-S 1 as follows:

"~~To help tackle climate change,~~ *All* development should ~~aim to~~ *be located and designed (including through the use of sustainable construction techniques) to* maximise its economic, social and environmental benefits simultaneously, minimise its adverse impacts~~,~~ *and deliver net gains across each of these objectives*. ~~utilising sustainable construction techniques and actively seek opportunities to secure net gains across each of the different objectives.~~

We support the preference given to the re-use of previously developed land (PDL) in the second paragraph of the policy. However, this should be qualified in line with our previous comments on brownfield land. We recommend revising sentence 2 of policy JP-S 1 as follows:

"Preference will be given to using previously-developed (brownfield) land *(where this does not conflict with other policies in PfE or the NPPF)* and vacant buildings to meet development needs".

Para 5.6

To ensure Greater Manchester meets its carbon commitments then GHG emissions associated with Land Use, Land Use Change and Forestry (LULUCF) must be accounted for. LULUCF is defined by the United Nations Climate Change Secretariat as a greenhouse gas inventory sector that covers emissions and removals of greenhouse gases resulting from direct human-induced land use such as settlements and commercial uses, land-use change, and forestry activities. Of paramount importance in GM are the effects of land use change associated with new settlement and commercial development on degraded or relict peatland sites, as is proposed in a number of PfE allocations. We recommend reviewing the impact of LULUCF emissions from allocations on the GM carbon neutrality 2038 target and suggest an additional commitment bullet is included in this section to highlight this:

- "*Ensuring new development is appropriately located in order to minimise its impacts on LULUCF emission contributions*"

Policy JP-S 2 Carbon and Energy

We strongly support this policy. However, as per our previous comments; there is a substantial amount of development proposed on peat within the PfE allocations which would negate the ability to utilise peatlands as a nature-based solution. The large-scale potential for carbon emissions reductions (as well as protecting the carbon store and potential for sequestration) from re-wetting drained peatlands is illustrated in the 2020 Natural England Greater Manchester Peat Pilot Report for Defra.[7] These allocations must be

[7] England Peat Strategy: Greater Manchester Peat Pilot report for Defra, September 2020

re-thought to ensure compliance with NPPF policies and to ensure consistency with PfE including Policy JP-S 2.

We recommend that clause 6 also refer to the preservation of existing peat-based habitats, as well as the restoration of such habitats. We recommend revising clause 6 of policy JP-S2 as follows:

"6. Increasing the contribution and range of nature-based solutions including carbon emissions reduction and sequestration through the *protection, enhancement and* restoration of peat-based habitats, woodland management, tree-planting and natural flood management techniques;

Policy JP-S 3 Heat and Energy Networks

We strongly support this policy. However, we feel that the "presumption in favour of network connection" to heat networks (clause 2a and 2c) should be more clearly spelt out, as a requirement that new development should be connected to such networks unless it is shown to be unviable to do so.

Chapter 6 – Places for Jobs

Policy JP-J 1 Supporting Long-Term Economic Growth

We support the objective of achieving a thriving, inclusive and productive economy across Greater Manchester. However, we have concerns about the level of consistency of the policy with net zero emissions and other environmental aims. These concerns include the wording (set out in clause G of the policy) to "maximise the potential" of locations such as the airport, HS2 and the M6 logistics hub. We are not convinced that the approach in its current form is fully consistent with achieving net zero emissions by 2038 or delivering the wider environmental objectives of the Plan. We recommend the policy is revised to make it clearer that growth in these locations must be of a sustainable nature and at a level which complies with other Plan objectives around climate change and other environmental concerns.

Policy JP-J 2 Employment Sites and Premises

We support the objective of working to increase the delivery of previously developed sites (PDL), as this could reduce pressure to release greenfield sites. However, this should be qualified in line with our previous comments on brownfield land. We recommend changing the last sentence of paragraph 2 within policy JP-J2

> "We will work with Government and other stakeholders to increase the delivery of previously-developed sites for employment use *(where this does not conflict with other policies in PfE or the NPPF)*, and hence minimise the need for any further Green Belt release.

In addition, see our detailed comments on Chapter 11 - Allocations below.

Policy JP-J 3 Office Development

See our comments about HS2 and Manchester Airport.

Policy JP-J 4 Industry and Warehousing Development

We acknowledge the need for a suitable amount of employment land to be provided. However, the method for estimating future employment land needs is still largely based upon extrapolating forward past trends[8]. Given the urgent need for systemic change to tackle the biodiversity and climate emergencies, we are not convinced that this approach is

[8] "Places for Everyone Employment Topic Paper", July 2021 – section 4

justified. We also note the statement in paragraph 6.36 that "The Green Belt sites have been selected in order to make the most of key assets and locations, with a focus on realising the potential of transport infrastructure such as the motorway network…etc." This seems to confirm our concerns that the sites have been largely chosen due to their economic potential rather than environmental factors – see our general comments.

Chapter 7 – Places for Homes

Policy JP-H 1 Scale, Distribution and Phasing of New Housing Development

The Trusts welcome in principle the intention that a substantial element of the proposed new housing will take place on brownfield land. However, in line with our previous comments on brownfield land we believe there are examples of where this preference for brownfield does conflict with other policies in PfE and the NPPF (particularly Section 15 – Conserving and Enhancing the Natural Environment) and is therefore deemed unsound. We also note that over 20,000 dwellings are proposed on new allocations, primarily on land removed from the Green Belt. In our view, it is crucial that environmental factors should have been at the forefront of the process for choosing both these allocations and those on brownfield land. As set out in our general comments we are not convinced that factors such as the presence of non-statutory designated sites for nature conservation, priority habitats and species (in particular S41 farmland birds), deep peat soils and high-grade farmland *etc*. been given sufficient consideration in the identification allocation sites.

S**ection 8 - Greener Places**

We generally welcome many of the policies in this section. We are particularly pleased to see reference to the outcomes of the GM Local Nature Recover Strategy Pilot and Nature Recovery Network mapping. However, we would recommend that LNRS and the opportunity maps within are specifically referenced within the text of all policies relating to habitat enhancement, creation or expansion to ensure the right habitats are created in the right places. This applies to policies JP-G 3, JP-G 4, JP-G 5, JP-G 6 and JP-G 7.

We are also disappointed to see the omission of a specific grasslands policy in this section (in line with the approach taken to set out specific policies on aquatic habitats, wetlands, mosslands, uplands, trees and woodlands. Species-rich grasslands are a habitat in rapid decline across Greater Manchester due to significant urban and agricultural expansion. Despite this, there are significant existing grassland assets (many of which are designated as SBI's) and opportunities for grassland creation across GM, as highlighted in the GM LNRS Pilot. We recommend an additional policy is inserted into Chapter 8 specifically focussing on grasslands to ensure these important habitats are not overlooked and considered proportionally in line with the other named habitats. We suggest that the grassland actions and measures included in the GM LNRS could be used to develop the clauses within this new 'Grassland' policy.

Policy JP-G 1 Valuing Important Landscapes

We generally support this policy but we would like to see the following considerations included in the list:

- Landscapes that support important wildlife populations.
- Functional connectivity of landscapes in relation to ecosystems and ecosystem services

Whilst we welcome the aim to achieve net enhancements to biodiversity in this policy, it would be best to replace this with the term "net gains for biodiversity" as this is more consistent with national policy (*e.g.* in the NPPF para. 174 d) and forthcoming legislation. We note that a net enhancement of geodiversity resources is not achievable in the timeframe of PfE and suggest that this is removed from the paragraph. We recommend paragraph 2 is revised to:

> "Transitional areas around new development and the interface of new development with the surrounding countryside/landscape are also of particular importance, requiring well-considered and sensitive treatment. In particular, opportunities to improve the intactness and condition of the landscape should be taken, especially in conjunction with ~~seeking~~ *securing* ~~a net enhancement of~~ *measurable net gains for biodiversity* ~~/~~~~geodiversity~~ resources under Policy JP-G 9 'A Net Enhancement of Biodiversity and Geodiversity'."

Policy JP-G 2 Green Infrastructure Network

We generally agree with this policy and we strongly support the inclusion of the map of existing Priority Green Infrastructure in figure 8.2. We also welcome the commitment to protect, manage and enhance Green Infrastructure to contribute to the development of a Nature Recovery Network for Greater Manchester. However, we feel that more accurate explanations and guidance are required to support this policy, particularly with reference to the functions of GI within the policy wording itself.

The policy should set out that GI covers both ecosystem/environmental services crucial for the quality of life but also for the conservation of habitats and wildlife and the enhancement of biodiversity. This is clearly set out in the UK Gove Natural Environment Planning Guidance (Paragraph: 005 Reference ID: 8-005-20190721)[9]: "Green infrastructure is a natural capital asset that provides multiple benefits, at a range of scales. For communities, these benefits can include enhanced wellbeing, outdoor recreation and access, enhanced biodiversity and landscapes, food and energy production, urban cooling, and the management of flood risk. These benefits are also known as ecosystem services". This is also clearly explained in Natural England's 2015 definition of Green Infrastructure '(GI is) a strategically planned and delivered network comprising the broadest range of high quality green spaces and other ecological features. It should be designed and manage as a multifunctional resource capable of delivering those ecological services and quality of life benefits required by the communities it serves and required to underpin sustainability'.

This distinct function is also recognised in Section 3 of the PfE Natural Environment Topic Paper. Paragraph 3.3 states ''Strategic priority green infrastructure is green infrastructure that delivers the most important ecosystem services. The study considers these to be: surface water and fluvial flood management; carbon storage and sequestration; water quality management; habitat and wildlife conservation; and public recreation and sustainable travel. Although the term 'green infrastructure' is used, it also includes 'blue' infrastructure including rivers, canals, lakes and other waterbodies.''. This distinction should be clarified in policy JP-G 2.

Some areas of green infrastructure should be primarily set aside for ecological or environmental considerations. They will contribute to vital ecosystem services for humans

[9] https://www.gov.uk/guidance/natural-environment

(for example flood control or pollination) but may not primarily contribute to considerations such as health and well-being or economic growth. Other areas of green infrastructure may be crucial for quality of life, but will have a lesser contribution to ecological functionality.

The policy should include guidance on how GI should be designed for maximum benefits, for example by taking a strategic approach through the use of ecological network mapping to ensure the most sensitive areas do not conflict with GI that primarily provides an open space function. In many instances, careful integration of the two functions could provide green spaces such as parks, gardens and pathways which are permeable to wildlife and connect to the wider environment or could provide nature reserves which are not compromised by inappropriately designed public access. How to effectively dovetail these two functions so that conflicts of interest do not occur needs to be made clearer in this policy.

The wording of the penultimate paragraph of the policy is somewhat unclear and we suggest some changes to address this, and to define what is meant by 'appropriate source(s)'. We recommend use of the word "facilitate" rather than "achieve" in the second sentence of this paragraph for clarity and to make it clear that the necessary improvements still need to be delivered:

> "Development within and around the Green Infrastructure Network should be consistent with delivering major green infrastructure improvements within ~~them~~ *the Network* and should contribute to improvements. Where Green Infrastructure Opportunity Areas overlap or are in close proximity to development allocations proposed in this plan appropriate measures to ~~achieve~~ *facilitate* this have been included. Further opportunities for delivering strategic green infrastructure enhancements and additional opportunities will be identified in the appropriate source(s) *defined in paragraph 8.15 of this Plan* over time as the overall green infrastructure network evolves."

In addition, we welcome the reference to the new Nature Recovery Strategies in the supporting text. If the relevant legislation has been enacted before the Plan is adopted it would be useful to refer to the proposed NRS for Greater Manchester in the Policy itself.

JP-G 3 River Valleys and Waterways

We support this policy although we would welcome an additional clause to confirm (for the avoidance of doubt) that where development proposals would enhance public access to river valleys and waterways; the harm avoidance mitigation hierarchy must be followed in line with policy JP-G9.

JP-G 4 Lowland Wetlands and Mosslands

The Trusts generally agree with this policy; particularly the references to protecting, enhancing and restoring these habitats. However, in line with our comments above, there is a substantial amount of development proposed within the PfE allocations that, if adopted, will contradict this policy. There are also a number of points where we think improvements could be made to the wording.

Point 1 fails to mention the importance of maintaining and enhancing the species populations associated with the Lowland wetlands and mosslands, in particular the breeding and wintering bird's characteristic of the area such as curlew and lapwing or mammals such as the brown hare. We suggest the following amendment:

> "Maintain and enhance the extensive and varied mosaic of semi-natural habitats including brooks, ditches, open water bodies, bog, fen, swamp, flashes, ponds, wet and broadleaved woodland, and grassland *as well as important species populations*."

We would also welcome an additional clause to confirm (for the avoidance of doubt) that where development proposals would enhance public access to wetlands and mosses; the harm avoidance mitigation hierarchy must be followed in line with policy JP-G9.

We would like to see a greater emphasis on long-term carbon storage in the main policy wording. This should differ from the current wording to sequester carbon mentioned in point 2 as it will commit to securing the sequestered carbon long-term. Point 2 should also be extended to apply to fen peats. In addition, the current wording could clarify that the intention is to restore lowland raised bog in general, not distinguishing whether it is remnant or not. We recommend the following:

> "Manage and restore ~~the remnant pockets of~~ lowland raised bog *and fen peats*, including through restoration from farmland, significantly expanding and connecting the areas of active bog *and fen* to contribute to important functions such as flood risk management, ~~and~~ carbon sequestration *and long term carbon storage*".

Point 3 of the policy - Positively manage land adjacent to lowland raised bog and other sensitive wetland habitats in a complementary and coordinated manner, ensuring that their hydrology is not adversely affected and the water table is restored – warrants an explanatory paragraph on how this could be achieved e.g. wetter farming techniques which are under development via Defra's lowland agricultural peat taskforce, use of forthcoming ELM schemes.

Point 4 provides examples of features which act as stepping stones for wildlife moving through the lowland wetlands and mosslands, however features such as trees and hedgerows are not always suitable to introduce into open lowland wetlands and mosslands. Instead (as previously suggested by The Wildlife Trust for Lancashire, Manchester & North Merseyside is our earlier submission on the Greater Manchester Spatial Framework), we would like to see the following wording:

> "Increase features that act as stepping stones *for locally characteristic wildlife moving through the area*, and minimise barriers to movement"

Paragraph 8.26 lists several sites including those within the Great Manchester Wetlands Nature Improvement Area and Ashton Moss in Tameside as being 'significant in terms of their biodiversity and geodiversity resources'. Firstly, it is not clear why the priority Lowland Wetlands and Mosslands are not listed within the policy text. Secondly, we are greatly concerned with inclusion of a number of mossland areas (Carrington Moss, Ashton Moss, Broadbent Moss, North of Irlam Station, Port Salford in the list of allocations as this conflicts with Policy JP-G 4. In line with the aspirations of this policy we would like to see these allocations re-located and sites restored 'which will not only have major nature conservation benefits, but could also make a considerable contribution to carbon targets, reducing a significant source of emissions and locking in additional carbon' (as per PfE para 8.28). The sites are suitably located for the delivery of high-quality green infrastructure and natural capital solutions to offset the effects of other allocations proposed in the wider PfE area and localised impacts arising as a result of climate change. Sites are included in a very limited number of undeveloped sites in the PfE area that can deliver alternative multi-functional benefits (as per NPPF Para 120b) and therefore alternative strategies should be investigated as a matter of priority. In the case of Carrington Moss and North of Irlam Station, at least, the principal statement in paragraph

8.30; that lowland bog areas will only be developed where they are shown to be of limited ecological value has clearly not been applied in the site-selection process.

Paragraph 8.28 Suggested wording The mosslands were originally typified by lowland raised bog, which supports a unique range of wildlife. Peat cutting and agriculture have left only small areas of undamaged peat deposits, and lowland raised bog is now one of Western Europe's rarest and most threatened habitats. Several restoration projects are underway within the Plan area, which ~~will~~ are not only hav~~ing~~ major nature conservation benefits, but ~~could also make~~ are making a considerable contribution to carbon targets, reducing a significant source of emissions and locking in additional carbon. Within Wigan Borough in particular, extensive valuable wetland habitats have formed on many former industrial sites where undermining has resulted in the formation of subsidence flashes and ponds. A mixture of pasture and arable cultivation is found in farmed areas surrounding the wetlands and active mossland, taking advantage of the productive peaty soils – although it should be noted that the drainage required to farm peat soils is causing rapid loss of the carbon and thus the soils themselves, an inherently unsustainable situation.

In respect of paragraph 8.30, we are also at a loss to understand how undeveloped mossland (degraded lowland bog) can be developed without irreversibly compromising the green infrastructure of the wider area in terms of ecosystem services that would otherwise deliver significant carbon storage and sequestration into the future, and secure potential for nature's recovery.

JP-G5 Uplands

We support this policy although we would welcome an additional clause to confirm (for the avoidance of doubt) that, where development proposals would enhance public access to uplands, the harm avoidance mitigation hierarchy must be followed in line with policy JP-G9.

JP-G 6 Urban Greenspace

We broadly agree with this policy, however, the statement that greenspaces will be protected and enhanced 'in balance with other considerations' is too vague. Greenspaces should be retained unless it is clearly shown that they are not needed to serve the needs of the area, or the public benefits of a development would clearly outweigh harm caused by the loss of the greenspace.

We also suggest that an additional point is included:

"*Urban green space should be favourable to wildlife and, where possible, physically connect to the wider environment.*"

JP-G7 Trees and Woodland

The Trusts support this policy and we particularly agree that protecting and expanding existing woodlands by buffering or connecting is the best approach. This will ensure both quality of life and biodiversity enhancements as well as contributing to other ecosystem services.

We welcome clause 4 of the policy however we recommend this is amended to ensure targeted tree planting opportunities are informed by the LNRS:

"4. Targeting tree-planting at the areas of greatest need where the green infrastructure benefits can be maximised, whilst avoiding the loss of, or harm to, other priority habitats, including encouraging woodland planting schemes on

appropriate areas of low grade agricultural land, ~~and~~ land in need of remediation *and other areas identified in the Local Nature Recovery Strategy*;"

We would also like to see a reference to the benefits of natural regeneration (managed succession) in this policy, as this is the most effective mechanism to create a functioning woodland. We would also like to see strong guidance on the careful planning of new plantations to ensure they have the best chance of becoming functioning woodland habitats and are not created to the detriment of other wildlife habitats. We therefore would like to see the following wording to point 11:

"11. Encouraging the positive management of woodland to bring it into a more productive state, *encourage natural regeneration*, improve habitat diversity, and more effectively contribute to green infrastructure functions such as flood risk management and carbon storage/sequestration."

The policy should also recognise that some sensitive woodlands (particularly ancient woodlands) may benefit from reduced disturbance, particularly during the bird nesting season. Therefore, we do not agree with the wording of point 10 and suggest the following wording:

"10. Improving public access to woodland and trees particularly by sustainable travel models to capture the health and wellbeing benefits whilst managing the associated pressures particularly *to avoid damage and disturbance in sensitive areas*;"

JP-G 8 Standards for a Greener Greater Manchester

Although we support this policy we ask that the explanatory paragraph is amended to distinguish between the different types of green infrastructure (refer to our response above). We suggest that the wording 'green infrastructure' (mentioned four times in the final paragraph) is amended to reflect its function in this instance. We therefore suggest the term 'accessible natural green space' is substituted to avoid unnecessary confusion.

We would also welcome changes to make the policy more affective, i.e. to specify that new development which breaches the proposed standards will not be allowed unless it would result in clear over-riding public benefits.

We recommend that GMCA considers adopting the 'Building with Nature' Green Infrastructure Standards[10] as its official "green factor" standards. Building with Nature Standards provide planners and developers with evidence-based, how-to, guidance on delivering high-quality green infrastructure and are overseen by a multi-disciplinary standards board including representatives from Natural England, Environment Agency, Planning Advisory Service, CIEEM and Royal Society of Wildlife Trusts amongst others. The guidance and accreditation are designed to fit in with requirements for the implementation and delivery of BNG and nature recovery networks/local nature recovery strategies.

Para 8.53

We are concerned with the statement at the end of this paragraph that a 'limited amount' of development on high grade agricultural land is necessary and the implication from the

[10] https://www.buildingwithnature.org.uk/

context of this paragraph that this also applies to peatland soils. We refer to the earlier points made about the potential for peat soils to be re-wetted to reverse carbon emissions and protect the carbon store, contributing to the carbon neutral target. This would apply to agricultural soils that are based on peat.

JP-G9 A Net Enhancement of Biodiversity and Geodiversity

We broadly agree with this policy but would like to highlight that crucially important considerations are missing. The statement that the net enhancement of biodiversity should be across the plan area as a whole (line 1 of the policy) may be misinterpreted. It should be clearer that the net enhancement should be widespread, substantial and measurable, and that it will be delivered both across the plan area as a whole and within local community areas.

We would prefer the term "net gain in biodiversity" be used rather than "enhancement", to ensure consistency with national policy, best practice guidance and the Environment Bill. It is strongly recommended that the latest version of the Defra metric (DEFRA 3.0 or later) is used. This is to enable consultants and stakeholders to fully understand/utilise the metric and to ensure it is compatible with other schemes in neighbouring local authorities or schemes that straddle LA boundaries.

We support the references to biodiversity action plans, Nature Recovery Networks and the Great Manchester Wetlands Nature Recovery Network (clauses 1, 2 and 6 of the policy). However, if the Environment Bill is enacted before the Plan is adopted the policy should be changed to also include Nature Recovery Strategies.

Recognition should be given to the fact that populations of priority species do not necessarily exclusively utilise priority habitats (for example farmland birds). We therefore suggest the following wording for point 1:

> "1. Increasing the quality, quantity, extent and diversity of habitats, particularly priority habitats identified in national or local biodiversity action plans and those *habitats* that support priority species."

Clause 4 of the policy should refer to local, as well as national, designations. We recommend:

> "4. Protecting sites designated for their nature conservation and/or geological importance, with the highest level of protection given to international, ~~and then~~ national *and then local* designations in accordance with legislation and national policy;"

We also suggest amendments to point 5 to reflect the fact that some habitats are sensitive to disturbance.

> "5. *Where appropriate facilitating greater access to nature, particularly within urban areas."*

We welcome the inclusion of the mitigation hierarchy in clause a) of the policy. However, the policy is less clear than the version set out in the NPPF (para. 180a) that development which fails to follow the hierarchy will be refused and that compensation is a "last resort". This should be addressed by wording changes.

We welcome the commitment to net biodiversity gain in clause c). However, this should be expanded to read "achieve a *measurable* net gain in biodiversity *of at least 10%*"

We welcome the requirement in clause e) that development affecting "best and most versatile" agricultural land should be supported by appropriate evidence. However, there should be an equivalent clause setting out the evidence concerning ecological matters required to support applications and that this should also accord with best practice.

The final sentence of the policy is a little unclear particularly in its reference to "have regard to". What are unsure of what this will mean in practice and therefore suggest a minor redraft *(note: we support the current reference to 10% increase in this clause but feel it would be better located in clause c – see comments above)*:

> "*Where offsite habitat enhancement and/or creation are required under the mitigation hierarchy or to achieve a net gain in biodiversity, these should normally be provided within the local area of the site. Contributions to strategic biodiversity priorities and initiatives affecting more distant locations may also be sought where appropriate.*"

JP-G 10 Green Belt

Although this is outside the scope of our core remit we believe green belt should overlap with the identified priority green infrastructure, this will enable *sustainable* development to occur. As stated in our general comments we have substantial concerns about the amount of land that is being removed from the Green Belt and the additional urban sprawl and reduction in gaps between urban areas which will occur. We also believe a number of the individual site allocations are unsound.

Policy JP-G 11 Safeguarded Land

The Trusts object to this policy due to its linkage to the HS2 scheme in its current form, to which the Trusts have both submitted strong objections. We also believe policy JP-G11 is extremely unclear as:

- It states (third bullet) that development will only be permitted where it would not prejudice the future use of the land, but without giving any indication of what the future use of the land may be
- The supporting text (para. 8.66) refers to safeguarded sites in plural whereas policy JP-G11 itself only lists one site.

Chapter 9 – Places for People

Policy JP-P 1 Sustainable Places

We welcome this policy although we would also welcome inclusion of biodiversity in clause 16 as this is also a key objective of new development.

Chapter 10 – Connected Places

Policy JP-C 3 Public Transport

See our earlier comments about HS2 and Northern Powerhouse Rail.

Policy JP-C 4 Streets for All

We support this policy including ambition to incorporate increased levels of greenery including trees where possible (clause 1g)

Policy JP-C 6 Freight and Logistics

We are concerned that this policy appears to give unconditional support for the growth of air freight at Manchester Airport. To address this, we suggest a change to make it clear that this is conditional upon climate change objectives being met. We recommend revising policy JP-C6 (clause 3):

> "Accommodating the expansion of air freight activities at Manchester Airport, *subject to compliance with the climate change policies of this Plan*.**"**

Chapter 11 - Allocations

We are concerned that the process for selecting sites for allocation has downplayed the role of environmental matters leading to many of the allocations being unsound. For example, we are astonished that the criteria used to identify the initial areas of search for site allocations in the Green Belt[11] failed to include the relative contribution that areas make to the purposes of the Green Belt[12] or the protection of environmental assets (e.g. designated sites of nature conservation, high-grade agricultural land, peatlands etc.), the latter of which form a crucially important resource in tackling the biodiversity and climate emergencies. We believe that these issues should have been central considerations from the outset, rather than later in the process. This failure has resulted in major conflicts with the proposed policies in Section 8 of PfE – Greener Places.

Similarly, there has been a lack of assessment of the individual and cumulative impacts of developments on the Nature Recovery Network and the commitments made in the biodiversity and geodiversity policy JP-G 9. Many of the allocations do not meet the commitments in the biodiversity and geodiversity policy JP-G 9 (clause 2) on improving connections between habitats, protecting and enhancing the provision of corridors, ecological networks and stepping stones that enable the movement of species, (clause 3) avoiding habitat fragmentation, and (clause 7) protecting peat-based soils. We suggest that all allocations are re-evaluated against the latest Greater Manchester Nature Recovery Network models to identify and then seek to avoid their impacts on these commitments.

These fundamental omissions have resulted in serious conflicts between many of the proposed allocations and proposed PfE environmental policies. In particular we strongly advise that all designated Sites of Biological Importance are removed from the allocated sites. We also advise that the Priority Green Infrastructure map (figure 8.2 in Section 8 – Greener Places) is used to inform and adjust the location of the allocations. We would like to see all future largescale developments located outside of the existing priority green infrastructure: we are shocked that this priority does not appear to have been taken into account. We suggest that the allocations proposed do not reflect the proposed policies and urge the combined authority to rethink the allocation proposals where major conflicts with the policies occur.

[11] Page 18 of "Places for Everyone: Site Selection Background Paper July 2020"
[12] Having regard to the purposes of Green Belt set out in para. 138 of the NPPF

As per the NPPF (2021), achieving sustainable development depends on development achieving three overarching objectives: economic, social and environmental. By ignoring environmental concerns in the initial site selection process, many of the proposed allocations cannot and will not achieve the environmental objective (as set out in the NPPF Para 8c) and therefore these allocations do not contribute to the achievement of sustainable development as required in NPPF Para 16a.

In addition to our concerns about the site selection process, we have some general concerns around Biodiversity Net Gain (BNG). A measurable biodiversity net gain has been mandated for all developments in England as set out in the NPPF 2021 (para 174d and 179d), the 25 Year Environment Plan (2018) and the current iteration of the forthcoming Environment Bill. This should be reflected in the published guidance for the development of allocation sites i.e. a measurable net gain in biodiversity should be demonstrated through the use of the Defra metric 3.0 (or the most recently updated version) across all allocations.

BNG must not replace or undermine the mitigation hierarchy. It must only be applied once the mitigation hierarchy has been fully followed, e.g. all Sites of Biological Importance (SBI's) should be avoided and removed from all allocations, or impacts to these sites must be mitigated or compensated for before BNG is assessed. Significant residual impacts to the SBI's could potentially include loss or fragmentation of designated or protected and priority habitats and species, an increase in recreational pressure and disturbance, increased light and noise pollution, development encroachment, spread of invasive garden species and predation by domestic pets as there is no un-developed buffer to many of the sites proposed (we recommend a minimum 50 m buffer to help mitigate potential disturbance and encroachment impacts).

To effectively contribute to nature's recovery, delivery of BNG must also be additional to existing mechanisms for nature conservation and enhancement. GMCA has a duty to have regard to the conservation of biodiversity as per the Natural Environment and Rural Communities (NERC) Act 2006. This is due to be updated and strengthened as part of the forthcoming Environment Bill with additional requirements to have regard to the relevant Local Nature Recovery Strategies, Species Conservation Strategies and Protected Sites Strategies, as part of the consideration. SBI's are already accounted for within this duty, and the updated duty in the Environment Bill, and therefore GMCA has an existing responsibility to protect and enhance the site. As a result, habitat delivery via BNG within SBI's would not be considered 'additional' and therefore is not in line with the good practice principles for development[13] and the British Standard (BS 8683:2021) Process for designing and implementing Biodiversity Net Gain.

The creation of habitat to deliver BNG on site can contribute to open space, but only where BNG measures are additional to existing requirements, i.e. not funding something that would or should happen anyway. Habitat creation cannot be counted toward BNG if it is required as a result of open space contributions or requirements for development as this is not considered to be additional. It is also important to consider that the majority of semi-natural habitats created for BNG, if subjected to the excessive disturbance impacts

[13] CIRIA (2019) Biodiversity Net Gain. Good Practice Principle for Development. A Practical Guide. CIRIA C776a. https://cieem.net/resource/biodiversity-net-gain-good-practice-principles-for-development-a-practical-guide/

associated with the use of open space, will not meet the appropriate criteria or condition to deliver the required BNG unit uplift to achieve a measurable net gain in biodiversity.

We are concerned that the process for selecting sites for allocation has downplayed the role of environmental matters leading to many of the allocations being unsound

CROSS-BOUNDARY STRATEGIC ALLOCATIONS

Policy JP Allocation 1.1 Heywood / Pilsworth (Northern Gateway)

1. The Wildlife Trust for Lancashire, Manchester & North Merseyside recommends that the development of this allocation be considered **unsound**: our reasoning follows:
2. The Trust welcomes the commitment within the supplementary evidence to maintain wildlife corridors within the site and enhance connectivity with the wider landscape, and that the brooks should continue to function as important wildlife corridors.
3. The Trust also welcomes Policy 10; to "*Make provision for new, high quality, publicly accessible multi-functional green and blue infrastructure to provide health benefits to workers and residents as well as creating a visually attractive environment and providing linkages to the site's wider drainage strategy in accordance with Policy JP-G 2 'Green Infrastructure Network' and Policy JP-G 8 'Standards for Greener Places'. This should include the integration and enhancement of existing features such as Hollins Brook/Brightly Brook SBI and Whittle Brook.*"
4. The Trust notes that a complete assessment of the sites' biodiversity interest was not possible and that the full site area could not be surveyed. Whist this might be adequate for a preliminary ecological assessment; in order to meet the test for soundness, the whole site will need to be surveyed in depth to provide an up to date and accurate assessment of its biodiversity interest: the Ecological Constraints and Opportunities Document (ECOD) acknowledges that, without mitigation, the development of the area would likely result in a net loss of biodiversity.
5. The preliminary desk top and walk over surveys show that the site supports significant and high value biodiversity, with Section 41 habitats and species being found within the proposed allocation area. The Trust therefore welcomes that the ECOD recommends that a number of dedicated surveys such as breeding and wintering bird surveys, further Great Crested Newt surveys and detailed phase one surveys will also be required to determine the ecological impact of the proposal at a future stage of the development process. Without this detailed survey information and mitigation action, we also believe that the proposal **will** result in the loss of biodiversity interest and in particular Section 41 species.
6. The Trust welcomes the recognition that any such losses would need to be addressed through detailed mitigation and enhancements and/or commuted sums that could be used to provide biodiversity gains in local nature conservation sites. However, this process must follow the Biodiversity Net Gain (BNG) mitigation hierarchy of avoid - mitigate - compensate. Compensation should only be seen as a last resort, and, where possible, undertaken in agreement with external decision-makers to compensate for losses that cannot be avoided. Off-site compensation should offset biodiversity losses by gains elsewhere. This hierarchy would need to be highlighted and outlined within the proposed Biodiversity Mitigation and Enhancement Plan at the design stage. The BNG must show 10% uplifts in both the area-based habitats as well as linear based habitats such as the hedgerows and brooks identified within the report.

7. The Trust notes that the desk top searches have shown that the site is of significant value for arable and grassland birds and that many of these, such as Lapwing, Grey Partridge and Yellow Wagtail are listed as Section 41 Priority Species. The walk over surveys also indicated that habitats on site could support breeding farmland birds, especially within the less intensively managed field/areas. The ECOD indicates that opportunities have been identified for protected and notable species and that this includes; the enhancement of good quality areas of grassland to create lowland wildflower meadows, species-rich acid grassland, species-rich neutral grassland. Whist the Trust welcomes this provision of grassland habitat; these areas need to be of sufficient size to support the ground nesting S41 birds identified as part of the ecological assessment. Species such as Lapwing require large open and quiet spaces with limited or no public access (dog-free *etc*). High levels of public access and planting of trees would all be incompatible with the maintenance and expansion of these species of open grasslands. Without this provision, there is a strong chance these species would be lost from the site.
8. The Trust would also point out BNG is based on habitats and uses established metrics to measure losses and gains. There are currently no agreed approaches for evaluating net gain for species. However, the guiding principles of BNG is that the requirements for species should be taken into account at each stage of the net gain assessment, for example, designing the habitats so that they support the Species of Principle Importance affected. This approach to S41 species must be undertaken and methodologies and conservation strategies for the species outlined within the proposed mitigation and enhancement plan.
9. The current development framework map provided as supplementary evidence **would not** provide sufficient open and secluded habitat to protect the S41 species and the development would therefore fail the principles of BNG.
10. S41 species are a material consideration in planning development and their loss without compensation would merit refusal, and as such they should be considered as a constraint on the proposed allocation.
11. The Greater Manchester Ecology Units Preliminary Ecological Appraisal report also highlights that they will be seeking provision for farmland birds. The mitigation and enhancement plan must show how these species are to benefit from the development of the site. If these species cannot be adequately mitigated on site, then off-site mitigation must be provided. Suitable compensation areas need to be identified and managed to enhance the populations of the S41 species. This approach will also benefit other fauna identified in the report, such as Brown Hare and Barn Owl.
12. It is important to note that Natural England's Magic Map also indicates that the area is important for its assemblages of arable and grassland farmland birds and that there are areas within the eastern section of the allocation area that are under Countryside Stewardship middle tier options. If this agreement is for provision for farmland birds, this also needs to be mitigated and/or compensated for. The NE Magic maps also indicate that the site has been identified for priority species Stewardship targeting for Lapwing and Snipe and has identified the area as important for farmland birds such as Lapwing, Grey Partridge, Snipe and Yellow Wagtail.
13. Clearly this area is of huge significance for its populations of farmland birds and the Mitigation Plan needs to better identify the issues affecting this important biodiversity resource and provide adequate mitigation/compensation proposals to show how these species will be enhanced.

Policy JP Allocation 1.2 (Simister & Bowlee)

The Wildlife Trust for Lancashire, Manchester & North Merseyside recommends that the development of this allocation be considered **unsound**: our reasoning follows:

1. The Trust notes and welcomes the proposals to create wetland habitat and to enhance the existing watercourse and riparian habitat across the allocation. The intent to protect and enhance Bradley Hall Farm SBI is also welcomed and that this will form a site-wide Biodiversity, Mitigation and Enhancement plan to promote and manage Biodiversity Net Gain at the detailed design stage. The Trust would add that the allocation policy to protect the SBI should also include the requirement to maintain the current green infrastructure linking the SBIs within and adjacent to the allocation and provide new areas of green infrastructure to maintain and enhance the ecological network within, across and around the allocation.
2. The Trust notes and welcomes Policy 14 to "*Make appropriate provision for the long term management and maintenance of areas of green infrastructure, biodiversity features and other areas of open space and sustainable drainage features*".
3. However, within the supplementary information provided, the Trust notes that a complete assessment of the site's biodiversity interest was not possible and that the full site area could not be surveyed. Whist this might be adequate for a preliminary ecological assessment; in order to meet the NPPF's test for soundness, the whole site will need to be surveyed in depth to provide an up to date and accurate assessment of its biodiversity interest.
4. The Ecological Constraints and Opportunities Document (ECOD) 2020, acknowledges that specific constraints for each parcel of land has not been completed and so current constraints might have been missed and that this would need to be rectified. An example of missed constraints can be found within table 3.2 within the ecological report, which states that '*the improved grasslands have low ecological value*' but then goes on to say that these provide foraging habitat for Badger, Brown Hare and farmland birds. The text should therefore be changed to low *botanical* value. The same applies to the assessment of arable areas.
5. The desktop searches and the walkover assessment do, however, conclude that the site could be suitable to support arable farmland and grassland bird assemblages. The species listed, such as Grey Partridge, Lapwing, Snipe, Yellow Wagtail, Skylark and Tree Sparrow, are all Species of Principal Importance (Section 41 Species).
6. The ECOD concludes that more detailed site-specific surveys, including a full extended Phase 1 habitat survey for each area and Phase 2 protected species surveys will be required as plans progress. However, there is no indication within the ecological report as to how S41 species can be protected and their populations enhanced.
7. The current illustrative development framework map shows that the areas of blue and green infrastructure are to be concentrated in a network of connected green corridors and ponds throughout the site and proposes that this will achieve biodiversity net gain. Whist this network of green corridors linking important habitat to each other and the wider environment is welcomed by the Trust, the reliance on narrow corridors and linkages as mitigation will be insufficient to ensure the protection of species such as Lapwing and Skylark.
8. The Trust notes the highlighted opportunities to enhance areas of grassland to create native wildflower meadows and welcomes this. However, the areas of retained and new habitat need to be of sufficient size to support the ground nesting S41 birds identified as part of the

ecological assessment. Species such as Lapwing and Skylark require large open and quite spaces with limited or no public access (dog-free *etc*). High levels of public access and planting of trees would all be incompatible with the maintenance and expansion of these species of open grasslands. Without this provision, there is a strong chance these species would be lost from the site.

9. The Trust would also point out BNG is based on habitats and uses established metrics to measure losses and gains. There are currently no agreed approaches for evaluating net gain for species. However, the guiding principles of BNG is that the requirements for species should be taken into account at each stage of the net gain assessment, for example, designing the habitats so that they support the Species of Principal Importance affected. This approach to S41 species must be undertaken and methodologies and conservation strategies for the species outlined within the proposed mitigation and enhancement plan. S41 species are a material consideration in planning development and their loss without compensation would merit refusal, and as such they should be considered as a constraint on the proposed allocation.
10. The Greater Manchester Ecology Unit's Preliminary Ecological Appraisal report also highlights that it will be seeking provision for farmland birds. The mitigation and enhancement plan must show how these species are to benefit from the development of the site. If these species cannot be adequately mitigated on site, then off-site mitigation must be provided. Suitable compensation areas need to be identified and managed to enhance the populations of the S41 species. This approach will also benefit other fauna identified in the report such as Brown Hare and Barn Owl.
11. The Trust also notes that large sections of the site are under Countryside Stewardship middle tier options. If the options within the Stewardship agreement is for provision and/or management for farmland birds then the loss of this management also needs to be mitigated and/or compensated for.

Policy JP Allocation 2 Stakehill

The Wildlife Trust for Lancashire, Manchester & North Merseyside recommends that the development of this allocation be considered **unsound**: our reasoning follows:

1. The Trust notes that existing pond habitat to be found within the site is to be lost and that these ponds might well have the potential to support the specially protected Great Crested Newt. Whilst the Trust welcomes the proposal to create new pond habitat, and that terrestrial habitat should be created surrounding each new pond, the Trust would draw attention to the mitigation hierarchy requirements under Biodiversity Net Gain to avoid, then to mitigate, and finally to compensate. Compensation should only be seen as a last resort and the reasoning behind not being able to firstly avoid and secondly not mitigate must be clearly provided. Where possible, compensation should be undertaken in agreement with external decision-makers to compensate for losses that cannot be avoided or mitigated.
2. Whilst the Trust welcomes the proposal to create commuting links between the newly created pond habitat and grassland and woodland blocks, biodiversity would be better served as outlined above; by retaining the priority pond habitat identified and retaining and enhancing the links between the existing biodiversity assets and the wider environment, most notably the Rochdale Canal SAC/SSSI.

3. Where retention of such habitats is proven to be impossible, the quality of the compensatory habitat must be of a better ecological quality than that lost. As indicated within the ecological appraisals, further surveys, including Great Crested Newt surveys, must be undertaken to fully assess the impact of the proposed development on the biodiversity of the area and the level of mitigation/compensation required to ensure at least a 10% biodiversity net gain.
4. Whilst a number of the suggested recommendations within the reports would mitigate/compensate biodiversity losses, the Trust notes that the site has the potential to support ground nesting birds such as Lapwing and Skylark and other farmland birds. In fact, over 20 records of Section 41 species have been recorded on the site. Natural England's Magic map also indicates that area may well be important for Lapwing, Grey Partridge, Redshank and Snipe and is within a priority Species targeting stewardship area for upland breeding birds and for grassland assemblages of farmland bird. The ecological reports indicate that there will be habitat loss for breeding and foraging birds as a result of the proposals and that if significant areas of grassland under a relaxed management regime are to be lost to the proposals, breeding bird surveys may be required to inform mitigation requirements for ground nesting birds such as Lapwing.
5. The Trust welcomes this commitment to provide mitigation for these S41 species. We would however point out that species such as lapwing and Skylark require large open and quiet spaces with limited or no public access (dog-free etc). High levels of public access and planting of trees would all be incompatible with the maintenance and expansion of these species of open grasslands. Without this provision, there is a strong chance these species would be lost from the site. The Trust would also point out BNG is based on habitats and uses established metrics to measure losses and gains. There are currently no agreed approaches for evaluating net gain for species. However, the guiding principles of BNG is that the requirements for species should be taken into account at each stage of the net gain assessment, for example, designing the habitats so that they support the Species of Principle Importance affected. This approach to S41 species must be undertaken and methodologies and conservation strategies for the species outlined within any proposed mitigation and enhancement plans. S41 species are a material consideration in planning development and their loss without compensation would merit refusal, and as such they should be considered as a potential constraint on the proposed allocation. Mitigation and enhancement plans must be provided and must show how these species are to benefit from the development of the site. If these species cannot be adequately mitigated on site, then off-site mitigation must be provided. Suitable compensation areas need to be identified and managed to enhance the populations of the S41 species. This approach will also benefit other biodiversity assets such as Brown Hare and Barn Owl.
6. The Trust notes also that Willow Tit, another section 41 species has been recorded in the southern section of the site. This species has very specific habitat requirements and the retention and provision of habitat will need to be carefully thought through. Blocks of scrub woodland would need to be provided that would help this species move through the landscape as well as providing breeding opportunities.
7. The Trust notes that the Central Area's Ecological Notes refers to a mosaic of habitats such as grasslands, scrub hedges, scattered trees, tall ruderal and open water and states that as the habitats found in this area are of poor quality, there is no legal obligation to provide compensation. This is clearly inaccurate as under BNG all habitat to be lost must be counted under the metric and compensated for. The habitat described could well be good terrestrial

habitat for amphibians and provides corridors and dispersal routes for important species, including the Willow Tit.

8. The Trust also notes that the GMEU have identified that ecological mitigation and compensation will be needed to avoid harm to important habitats and species and that as it is close to the Rochdale Canal SAC/SSSI, an assessment of the potential impacts of any development proposals on the special nature conservation importance of the Rochdale Canal SAC will also be needed. The Trust supports this requirement.

Policy JP Allocation 3.1 Medipark

The Wildlife Trust for Lancashire, Manchester & North Merseyside recommends that the development of this allocation be considered **unsound**: our reasoning follows:

1. No specific ecological surveys or ecological appraisal has been undertaken on the site. Without this ecological constraint cannot be identified. The Allocations: Viability and Deliverability Assessment identifies and recognises green and blue infrastructure under constraints and opportunities, but there is no specific mention of biodiversity constraints. This needs to be rectified.
2. The outlined policies within the allocations document indicate the provision of high-quality natural landscaping, including the provision of native species, that should be delivered adjoining the brook to help mitigate flood risk and promote biodiversity and green infrastructure. The allocation policies also indicate that ecological surveys are required to show the existing ecological interests and how this can be enhanced. The AVDA: also indicates that Fairywell Brook should be enhanced as part of the overall development in order to be utilised as a blue / green corridor providing a natural buffer between development on the site and at Timperley Wedge. The Trust would add that any proposed green corridors must link existing and newly created habitat with the wider environment.
3. The report also indicates development should support the existing biodiversity habitats that run through the site. Whist the proposals to enhance these biodiversity habitats is welcomed, the Trust would stress that any ecological mitigation/compensation proposed must be based on accurate and up to date data on the existing biodiversity assets and how these can be protected and enhanced and must lead to a 10% uplift in biodiversity value. Without detailed surveys on the current existing biodiversity interest, mitigation and compensation plans may well any habitat lead to inappropriate planting and landscaping schemes. For instance, Natural England's Magic Map identifies that the area could be important for Lapwing. If surveys indicate that this S41 species is found within the site, mitigation and compensation must be aimed at retaining and enhancing the area for this species. The cumulative effect of the adjacent development at Timperley Wedge must also be taken into account on the biodiversity of the area.

Policy JP Allocation 3.2 Timperley Wedge

CWT recommends the development of the Timperley Wedge Allocation is **unsound** for the following reasons:

1. This site incorporates two Sites of Biological Importance (SBI); Ponds at Davenport Green SBI and Davenport Green Woods SBI. These sites must be excluded from the allocation to comply with PfE Policies JP-G 2 and JP-G 9 and NPPF (2021) Paragraphs 174a, 174d, 175, 179a, 179b and 180a.

2. The site incorporates an area of ancient woodland, an irreplaceable habitat as per the NPPF para 180c, which will be significantly affected by the proposed scheme.

3. Allocation of this site conflicts with PfE Policy JP-G 2 and NPPF Para 175 as part of the site sits within the PfE Green Infrastructure network.

4. Securing a measurable biodiversity net gain of 10% for this site, in line with PfE Policy JP-G 9 and NPPF Paragraphs 174d and 179b, may not be possible due to the current high value of the site.

5. The site supports the largest known population of Great Crested Newt in Trafford; a species protected in the UK under the Wildlife and Countryside Act (1981) as amended, a European Protected Species under Annex IV of the European Habitats Directive a priority and a UK BAP Priority Species and Species of Principal Importance for Conservation in England (SPI) under the NERC Act 2006. This population could potentially be significantly impacted by the proposed allocation thereby contradicting NPPF Para 179b.

6. Other examples of potential priority habitats including semi-natural woodland, several ponds and areas of semi-natural grassland are also located within the Timperley Wedge allocation. The mitigation hierarchy should be applied to comply with Policy JP-G 9 and national planning policies (highlighted above) and all these areas should be excluded from the allocation in order to avoid harm to biodiversity.

7. Timperley Wedge may potentially be important for the populations of breeding and wintering birds it supports including BoCC red listed birds such as lesser redpoll, skylark, yellowhammer, herring gull, grasshopper warbler, curlew, redwing and Lapwing. It may also support barn owl and kingfisher, both species protected in the UK under the Wildlife and Countryside Act (1981) as amended. Curlew are classed as globally near threatened and are possibly the UK's most important bird conservation priority (https://www.bto.org/science/latest-research/decline-curlew). In order to comply with the mitigation hierarchy as set out in Policy JP-G 9 and national planning policies (outlined above), measures will be required to avoid and mitigate the impacts on these important species.

BOLTON
JPA 4: Bewshill Farm

The Wildlife Trust for Lancashire, Manchester & North Merseyside recommends that the development of this allocation be considered to be **unsound**: our reasoning follows:

1. Whilst the landscape section of the Bewshill Farm 'Topics' paper discusses the incorporation of and management of existing landscape features such as woodlands and hedgerows, the Bewshill Farm allocations policy does not specifically address ecological or biodiversity issues.
2. The whole site is allocated within the Green Infrastructure opportunity area and there is identified Green Infrastructure that runs along the southern section of the site. However, no information on the current biodiversity interest is provided, without which ecological constraints and/or opportunities cannot be identified. Detailed, accurate and up-to-date habitat and species surveys must be undertaken. This data must then be used to inform any

ecological avoidance, mitigation and/or compensation provided. Biodiversity enhancement plans need to be provided and the proposal needs to evidence how it would be able to provide the required 10% biodiversity uplift.

3. Notwithstanding this, the Trust feels that landscaping should be provided that buffers the green infrastructure to the east and west of the site and protects and buffers the Cutacre Brook SBI and amphibian populations to the south of the proposed allocation.
4. Interrogation of Natural England's Magic Map indicates that the woodlands along the brook are identified within the priority habitat inventory and that good quality semi-improved grassland (non-priority) habitat lies immediately adjacent to the east. Magic Map also identifies that this area is within the Countryside Stewardship targeting area for Lapwing. Specific farmland bird surveys, therefore, need to be undertaken to assess the site's importance in supporting such species. This information should then be used to inform the Biodiversity Net Gain mitigation hierarchy of avoid, mitigate and finally, where no alternative is available, compensate any consequent loss of existing biodiversity.

JPA5 Chequerbent North

The Wildlife Trust for Lancashire, Manchester & North Merseyside recommends that the development of this allocation be considered to be profoundly **unsound**: our reasoning follows:

1. The Trust welcomes and agrees with the ecological report's recommendations that identified wildlife corridors, woodlands, hedgerows and ponds and high value habitat existing within the site should be retained and protected by habitat buffers. However, there are no specific allocation policies to deliver this.
2. The Ecological Representation report provided as supplementary information concludes that, as the site is dominated by species-poor arable monoculture and semi-improved grassland, the majority of the site therefore has relatively low ecological value. Whilst this might be true in *botanical* terms, the report then highlights the importance of the grasslands for farmland bird species. The Ecological Representation report further states that this loss of grassland would result in a reduction in range for farmland bird species and Brown Hare (Section 41 species) along with a reduction in foraging habitat for Badger.
3. No specific bird surveys have yet been carried out; however, the desktop searches reveal that Section 41 bird species are present and that these include Grey Partridge, Lapwing and Skylark. These are birds of open grasslands that require undisturbed areas for breeding and feeding.
4. The report claims that the effect of the losses of this habitat should be balanced by creation of new habitats of value to birds and badgers; *e.g.* new ponds, wetlands, species-rich grasslands and woodland. However, the size and character of the grasslands provided must compensate for the impact of the species identified as being present and impacted.
5. It is clear from the development framework that the mitigation/compensation habitat provided would not be suitable for these species. The report agrees with this and states that '*These new habitats would be capable of supporting populations of Section 41 birds, **albeit not the same species that would be displaced from the farmed area***'. This approach to mitigation/compensation is unsustainable and would lead to the loss of S41 bird species from the site. **It would also set a dangerous national precedent for the fungibility of S41 species; an "oranges for apples" substitution**.
6. S41 species are a material consideration in planning development and their loss without compensation would merit refusal: as such, they should be considered as a potential constraint on the proposed allocation. Mitigation and enhancement plans must be provided

and must show how these species are to benefit from the development of the site. If these species cannot be adequately mitigated on site, then off-site mitigation must be provided. Suitable compensation areas need to be identified and managed to enhance the populations of the identified S41 bird species. This compensation must be in addition to the biodiversity net gain provided as part of the development.

7. The report appears to argue that BNG Policies within the *Places for Everyone* plan is only sought across the plan area as a whole. The Trust would strongly disagree with this. BNG must first be provided within each allocation before progressing to the local area and ultimately across the plan area as a whole. The proposed development must show that there is at least a 10% biodiversity uplift in additional to compensating for any loss of S41 bird species. There should also be a specific requirement within the allocation policy to protect the local brook and buffer and enhance the wetland ecological network that it provides.

JPA06 West of Wingates

The Wildlife Trust for Lancashire, Manchester & North Merseyside recommends that the development of this allocation be considered to be profoundly **unsound**: our reasoning follows:

1. The supporting information document highlights a number of S41 habitats such as woodland, hedgerows and ponds. The Trust welcomes the policy statement that development at the site will be required to protect the Site of Biological importance at Four Gates from development and incorporate very high levels of landscaping, including the retention of the existing woodland, hedgerows and ponds where practicable, so as to minimise the visual impact on the wider landscape and mitigate against its environmental impacts. However, the Trusts would add that, where this is not practicable, adequate mitigation habitat must be provided. Replacement ponds and ecologically linked habitats of higher quality must be provided and incorporated into the wider ecological networks.
2. The development of this site would put significant access and disturbance pressures onto Borsdane Wood SBI. To mitigate this, it will be necessary to protect the important features of the SBI by building in urban greenspace into the development to reduce public access pressure on its characteristic woodland flora and fauna. This should be made clear in the policy or supporting text.
3. The Trust is greatly concerned that the report concludes that the modified neutral grasslands have limited potential for wildlife without having actually provided *any* survey information. The report then goes on to say that the open, "poor", semi-improved grassland and arable fields also provide nesting opportunities for ground-nesting farmland birds. A quick desktop search of Natural England's Magic Map identifies the area as significant for Lapwing, Grey Partridge and Curlew. These S41 species are birds of open grasslands that require undisturbed areas. S41 species are a material consideration in planning development and their loss without compensation would merit refusal: as such, they should be considered as a potential constraint on the proposed allocation.
4. In line with the guidance outlined within the supporting information provided, the key potential effects of the proposed development on local ecological features will need to be fully assessed to inform design of the development to avoid or minimise impact and identify opportunities for enhancement, mitigation or compensation associated with any proposed development. Appropriate habitat and species surveys must be conducted and the findings used to steer the mitigation/compensation plan. Mitigation and enhancement plans must show how these species are to benefit from the development of the site.

5. If these species cannot be adequately mitigated on site, then off-site mitigation must be provided. Suitable compensation areas need to be identified and managed to enhance the populations of the identified S41 bird species. This compensation must be *in addition* to the biodiversity net gain provided as part of the development.

BURY

Policy JPA 7: (Elton Reservoir):

The Wildlife Trust for Lancashire, Manchester & North Merseyside recommends that the development of this allocation be considered to be profoundly **unsound**: our reasoning follows:

1. Within the Supplementary Information provided for this allocation, the Outlined Ecological Mitigation and Enhancement Strategy (EMES) highlights the ecological importance of this site. 7 SBI's are contained within the proposed development area, covering over 57ha. 36 ponds have been identified, with 10 supporting Great Crested Newt and/or Common Toad and are identified as Priority Habitat. It should be noted that experienced local ecologists have disputed the amphibian data' indicating that the survey data from the consultant ecologists is out of date and has seriously underestimated the distribution of Great Crested Newt and Toads within the development area as well as underestimating the number of high value 4 and 5 species amphibian ponds.
2. Winter and Breeding bird surveys have identified 12 priority species within the winter surveys and 13 priority species over the summer surveys. Many of these are amber and red listed birds of conservation concern and their protection and enhancement of their populations should be seen as a biodiversity priority. The area is known as an important wintering, breeding and passage site for many species of birds. In addition to its bird and amphibian interest, Brown Hare, a UK priority species has also been recorded on the site. Information provided by local ecological experts shows that the site also supports breeding Otter and Badger, both species of principal importance that require special consideration as part of the planning process.
3. The EMES identified that much of the site's ecological assets are of County (*i.e.* City Regional) Importance, including for wintering and breeding birds, Great Crested Newt and Ponds identified as Priority habitat. Together with the remaining biodiversity habitats and species, this area is undoubtedly a biodiversity hot spot and the Trusts believe that the site is wholly unsuitable for such largescale development. Not only will there be a significant loss of habitat to development, it is also clear that one of the main aims of the allocation is to develop a strategic recreation, leisure and tourism resource within the site and the wider area. Whilst this is often seen as a positive for development, the choice of location in this instance has very serious and damaging implications for key biodiversity assets and there are grave doubts as to how the identified biodiversity assets can be incorporated into the development proposals.
4. An example of how the biodiversity assets are to be affected is detailed within the ecological reports and the Illustrative master plan map provided. The report from the desktop study and ecological survey undertaken by the ecological consultants recommended that "*the areas of the site which are designated as Sites of Biological Importance should be retained and protected in the design of the site layout".* The topics paper also states that the ecological report conclude that it was feasible to achieve protection of the SBIs, priority habitats and protected species as part of the mitigation proposals. However, the Elton Parkland Indicative Master Plan Map shows that there will be significant losses of SBI

habitat, with both Elton Goyt and Spen Moor Pond SBI's suffering partial losses. The plan shows that significant areas of these SBI's will be lost to development.

5. The phase one habitat survey conducted by the ecological consultants then only refers to the protection and conservation of the SBI's and their features of interest as **where feasible**. The Phase One survey report also refers to the conservation of the Sites of Biological Importance (SBI) and their features of interest, particularly bird species diversity, with appropriate buffers, and / or secure, deliver and manage compensatory habitats, **where possible**. Clearly the protection of the SBI's has been watered down within these reports. There is no clear allocation policy that indicates that the SBI's will be protected. The Trust therefore strongly recommends that within the allocation policy there should be a clear indication that the SBI's and their features of interest should be protected.
6. Local Wildlife Sites (SBI's) must be excluded from the allocation to comply with PfE policies JP-G 2 and JP-G 9 and NPPF (2021) Paragraphs 174a, 174d, 175, 179a, 179b and 180a. There is also a presumption against the loss of SBI's within current Bury Local Plan policies (EN6.1 to EN6.3 inclusive). This development is therefore contrary to such policies.
7. The desk top surveys and the 2017 breeding and winter bird surveys show that the site is an important area for its farmland bird species, including good numbers of Lapwing, a UK priority Species. The ecology reports indicate that the two main areas for Lapwing are proposed to be developed. This includes large tracts of semi-improved grassland within the southern part of the site and parts of Elton Goyt SBI.
8. It should be noted that other priority species identified in the surveys, namely Skylark, Grey Partridge and Brown Hare, will also be reliant on these open undisturbed areas. Both Lapwing and Skylark are habitat-dependent. The habitat must be open in nature and undisturbed. Adjacent trees, housing and people, especially people exercising dogs, will result in the loss of these species from an area. The Trusts note that the guidance outlined within the bird survey report and the EMES recognises these issues and indicates *"that in the absence of a carefully considered development framework there is* ***a risk of a significant impact on the bird species*** *diversity in the area. This is of particular relevance in consideration of Priority Species (which are capable of being a material consideration in a planning decision).* ***It is recognised that the proposals will result in the loss of habitats used by birds, particularly nesting birds***. The reports then go on to say that, whilst mitigation and effective compensation is feasible for a number of species, ***"for the species identified to be particularly sensitive (or species with specific habitat requirements) such as Lapwing and Skylark it will be essential to allocate areas of the site for these species and possibly identify loss of habitat / displacement as an impact of the proposals."***
9. The reports also indicate that, within the development framework, *"the conservation value of the habitats must be considered in terms of their extent and in combination"* and that the proposal "*must therefore seek to retain large expanses of those habitats identified as being most favoured by ground nesting and perching species"* as well as *"ensure they remain connected both within the site and to the wider area".* The Trusts would agree with this statement entirely but not only do we have serious doubts as to the deliverability of this for Lapwing and Skylark, it would appear that the EMES itself also provides doubts as to the ability of the development not to adversely affect the sites ecological features. The Master Plan map indicates that most of the potential habitat for Lapwing and Skylark is much reduced in area. The overview of likely ecological impacts outlined within the EMES identifies habitat loss as an impact of the development and that "***despite the avoidance and conservation of the Priority Habitat the loss of 6.15 hectares of semi-improved grassland and 4.35 hectares of marshy grassland is likely".***

10. The EMES goes on to say that the loss of habitat and its magnitude of impacts will be dependent on the species and habitat requirements / sensitivities and that "***losses (in terms of area of suitable habitat and possible disturbance impacts) may be a residual impact for species such as Lapwing.*** The Trust believes that the impact will be higher than that indicated, as the EMES goes on to say that there will be increased recreational pressures including post development interference impacts and that the *"Increase in local population will increase use of footpaths and access to the wider site* ***including retained and sensitivity habitats****".* The Trust notes that the managed agricultural fields and grasslands provided as mitigation are ringed around the main reservoir, which is the main centre for recreational activities. The Parkland Strategy itself states that "F*uture residents will have access to a new country park including a variety of recreation and leisure facilities centred around the Elton and Withins reservoirs".* The Trust therefore believes it is not possible to ensure that enough open and undisturbed habitat can be provided within the development area to support a healthy population of breeding farmland birds such as Lapwing and Skylark and mammals such as Brown Hare that the proposal could lead to the loss of these Section 41 species from the area.
11. The EMES strategy aims to mitigate for any species-specific residual effects to an acceptable level. The Trust would strongly argue that **residual impacts on identified priority species are not acceptable** and is contrary to the Policies contained within the allocation plan. One of the main stated principles and objectives of the EMES is to "*. Maintain populations of the identified protected species and priority species (bird species) at a favourable conservation status and* ***implement actions to achieve enhancement****"* It would appear that this is not feasible within the development for species such as Lapwing, Skylark and Brown Hare. The definition of favourable conservation status is when "population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats, and the natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future, and there is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis." The EMES appears to conclude that "*Where residual effects are anticipated (for example the decrease in area of opportunities for breeding Lapwing) the measures to be applied to provide mitigation and compensation to* ***retain*** *Lapwing at the site are described".* This again indicates that the Lapwing population will be adversely affected and that enhancement or even maintenance of the population is not considered possible. No evidence has yet been provided to show what the actual effects of the development will be on these S41 species. What will be the fall in breeding pairs as a result of the development? and is this significant in terms of percentages losses? The EMES states that there will be a residual effect, however, given the reduced amount of suitable habitat in combination with increased visitor pressure we feel this is likely to be higher. The increased recreational pressures brought about by the development will also adversely affect many other important species contained within the site such as Otter, Barn Owl and Brown Hare.
12. There is also a further problem with concentrating the biodiversity features into a smaller area, in that some of the identified species have conflicting habitat requirements. Willow Tit have been recorded in the area, although it is noted that breeding is not confirmed by the surveys. This species requires dense area of scrub/woodland habitat and also require that breeding areas are linked by groups of trees. Lapwing and Skylark require large open grasslands and are discouraged from breeding by the close proximity of trees. Provision of habitat for Willow Tit, also a S41 species will reduce the areas suitable for Lapwing. Even if Willow Tit are not a current breeding species, then habitat mitigation for this species would

be appropriate. Similar woodland/scrub creation would benefit other species present on the site, but again at the expense of Lapwing and Skylark. The only reason these species, with such diverse requirements can be found within the allocation area is that it is large enough to support a wide range of habitats and with large enough areas to support them. This is similar when considering recreation activities that the development will concentrate the recreation and bring the biodiversity features into closer contact and conflict with site users. The Trust also notes the EMES assertion that habitat creation at the grasslands and at Elton Reservoir along with other measures to provide enhancement for Priority Species/species of a similar conservation status will off-set any reduction in carrying capacity for the site for use by Lapwing. The Trust strongly disagrees with this statement. S41 species are a material consideration in planning decisions. It is not acceptable to compensate for the loss or reduction of one species through mitigation of another. Even BNG, where you can trade habitats will not accept this habitat trading within higher level habitats.

13. The Trust therefore has serious doubts as to the deliverability of on-site mitigation for a number of S41 species. Evidence needs to be provided as to what land is available for on-site compensation/mitigation. Has the land been identified where appropriate management can be undertaken? and who owns the land on which these mitigations are proposed, are there agreements in place? These are all questions that need to be answered. Offsite compensation may therefore be required if this the allocation was consented. No off-site area for compensation has been identified as far as we are aware. If on-site mitigation is not possible, Off-site compensation needs to be provided. Compensation areas must be appropriately managed and be supported by long-term management and maintenance plans.
14. The Trust notes that a local ecological expert also disputes the stated value of the grassland areas and that these are higher than reported. Further species records have also been provided by the local expert, indicating the site supports more biodiversity than the surveys indicate.
15. The Trust would stress that accurate and up to date surveys are vital in showing any potential ecological constraints of site allocations. Elton Reservoir and its surrounds is an undoubted biodiversity hot spot and the constraints on development of the area are large and varied. The Trust therefore considers that the proposed development is not appropriate and that it would seriously damage the identified biodiversity assets.

JPA 8: Seedfield

The Wildlife Trust for Lancashire, Manchester & North Merseyside recommends that the development of this allocation be considered to be **unsound** for the following reasons:

1. This allocation selection is not *Justified* as it is unevidenced in biodiversity terms. No ecological appraisal has been undertaken on the site and the current biodiversity interest has not been detailed. Without this information we cannot determine what ecological mitigation and/or compensation will be required to provide the Biodiversity Net Gain (BNG); nor is it possible to identify what current ecological interest needs to be retained. This information is required to fully assess the allocation. The statement that there are no known ecological issues on the allocation and it should be suitable for development is therefore misleading. There are no known ecological issues because these are “known unknowns”: these issues have not been assessed or at least provided as supplementary information that could be assessed.

2. The Trust welcomes the commitment within Policy 7 to retain and enhance wildlife corridors and green infrastructure elements to the west and south of the allocation and provide net gains for biodiversity assets within the allocation. Sustainable Drainage Schemes (SuDS) will help to provide green infrastructure (GI) that will benefit biodiversity and welcome that this is to be connected to the wider green and blue infrastructure network.
3. We also welcome the commitment within Policy 11 to provide for long-term management and maintenance for the GI, biodiversity features and SuDS scheme.

JPA 9: Walshaw

The Wildlife Trust for Lancashire, Manchester & North Merseyside recommends that the development of this allocation be considered to be **unsound** for the following reasons:

1. The Ecological Technical Notes identify that the Cyrus Ainsworth's Nurseries and Parker's Lodge SBI is located in the eastern section of the southern development area of the site. A minimum offset of 15m between the SBI boundary and any development would be required. This would need to be included within the policy section of the allocation, which would need to specify the protection and enhancement of the adjacent Local Wildlife Site.
2. Local Wildlife Sites (SBI's) must be excluded from the allocation to comply with PfE policies JP-G 2 and JP-G 9 and NPPF (2021) Paragraphs 174a, 174d, 175, 179a, 179b and 180a. There is also a presumption against the loss of SBI's within current Bury Local Plan policies (EN6.1 to EN6.3 inclusive). This development is therefore contrary to such policies.
3. The Trust welcomes many of the policy proposals to include multifunctional green and blue infrastructure within the allocation and to integrate and enhance existing green infrastructure corridors along Walshaw and Elton Brooks.
4. We note and welcome the commitment to provide net gains for biodiversity assets: however, this should not just be focused on the Walshaw and Elton Brook corridors but should be led by the relevant habitat and species surveys that will need to be provided as part of the development process. The provision of blue and green infrastructure may also be required that is solely for biodiversity gain, rather than multifunctional and enough provision will need to be made for such instances. SuDS techniques prioritising the use of ponds, swales and other infrastructure will aid in proving corridors for wildlife, but as above some habitat may be required for purely wildlife purposes.
5. There is no mention within the text of protecting pond habitat, although the need to do so is identified within the Ecological Technical Notes.
6. The Statement that

"*The development will need to have regard to any existing ecological and wildlife features including Walshaw and Elton Brooks which run through the northern and southern parts of the allocation by minimising impacts on and providing net gains for biodiversity*"

should be changed to;

"The development will need to protect and enhance any existing ecological and wildlife features including Walshaw and Elton Brooks which run through the northern and southern parts of the allocation by minimising impacts on and providing net gains for biodiversity".

7. The development would need to comply with the Biodiversity Net Gain mitigation hierarchy of avoid - mitigate - compensate. This has already been identified within the Ecological Appraisal of the site which states that "*Enhancing retained woodland would be an easier*

way to meet the Biodiversity targets. If the woodland has to be lost, detailed vegetation surveys would be required to inform the Biodiversity Metric Calculations and develop appropriate mitigation."

8. As per the requirements of the Bury UDP policy for wildlife corridors, the development within or adjacent to identified Wildlife Links and Corridors should contribute to their effectiveness through the design, landscaping and siting of development proposals.

9. The Trust welcomes the commitment to make provision for long-term management and maintenance of the areas of green infrastructure, biodiversity features and other areas of open space and sustainable drainage features.

10. The Ecological Appraisal and the Ecology Technical Notes identify that the grassland areas within the allocation are of value to birds, small mammal species, reptiles and amphibians. Bats may also use the areas for forage. The longer sward also provides good foraging habitat for **Barn Owl.** This type of habitat is less common within the wider environment and would need to be replaced with wildflower planting or areas of grassland under a relaxed mowing regime. The appraisal also provides evidence of the importance of the grasslands for S41 farmland birds. Desk top searches provided multiple records of S41 bird species being returned within 1km of the site. These species include Bullfinch, Dunnock, House Sparrow, Song Thrush and Starling. The less intensively managed grasslands offer habitat for ground nesting birds such as Skylark and Lapwing**.** There will be habitat loss for breeding and foraging birds as a result of the proposals. The appraisal states that "*If significant areas of grassland under a relaxed management regime are to be lost to the proposals, breeding bird surveys may be required to inform mitigation requirements for ground nesting birds such as skylark.*" The Trust would strongly argue that such surveys are vital to ensure compliance with NPPF's test for soundness.
11. The Trust would also argue that, whilst mitigation for many of these species is possible, the integration of ground-nesting birds such as Skylark and Lapwing within the development is more problematic.
12. The Topics paper indicates that "*BNG will be expected to be provided on site and off site and should contribute towards enhancing and providing connectivity for local habitat and species priorities. For the Walshaw allocation this would include, ensuring the current pinch point along Lowercroft Road and High Street on the Elton Brook wildlife corridor is not weakened, treating the Walshaw Brook as strategic wildlife corridor and enhancing connectivity for woodland, scrub and riparian species. It will be important to ensure that BNG is integrated with other green infrastructure functions such as recreation and surface water management.*".
13. Whilst the Trust agrees and welcomes this commitment, offsite compensation may be required to support priority species such as Skylark and Lapwing that might be lost due to the development and that might not be able to be integrated into the proposed development. Mitigation and enhancement plans must show how these important S41 species are to benefit from the development of the site. If these species cannot be adequately mitigated on site, then off-site mitigation must be provided. Suitable compensation areas need to be identified and managed to enhance the populations of the identified S41 bird species. This compensation must be in addition to the biodiversity net gain provided as part of the development.

MANCHESTER

LPA 10: Global Logistics
The Wildlife Trust for Lancashire, Manchester & North Merseyside recommends that the development of this allocation be considered to be **unsound** for the following reasons:

1. No supporting evidence has been provided for this allocation and we currently have no knowledge of this site's biodiversity assets nor its position in identified ecological networks.
2. We reserve the right to comment further if and when we do. The selection of this allocation site is therefore not Justified as it is unevidenced in terms of biodiversity assets and considerations. The proposal must undertake up to date and in-depth surveys of all the ecological features on and adjacent to the development. These should include surveys for bats, badgers and farmland birds. Avoidance and/or mitigation and/or compensation plans must be drawn up to ensure no loss of current wildlife interest and to ensure that sustainable biodiversity net gain is built into the proposals.
3. The Trust notes that the Greater Manchester Ecology Unit has provided recommendations regarding the requirements for newt licencing, appropriate up to date surveys and the provision of adequate mitigation and compensation, along with the assurances of the longevity of any new habitat created. 10% BNG must be achievable and deliverable as part of a long-term management plan. The Trust would support these comments.
4. The Trust notes that the allocation policy states that the development will "*Minimise any adverse impact on national and locally designated assets of conservation, ecological and landscape value. In particular, development should avoid the Cotterill Clough SSSI, nearby SBIs and ancient woodland*". However, the proposed allocation site still includes part of the Sunbank Wood & Ponds SBI. **This site must be excluded from the allocation to comply with PfE policies JP-G 2 and JP-G 9 and NPPF (2021) Paragraphs 174a, 174d, 175, 179a, 179b and 180a.**
5. We believe that the policy should be reworded to:

   "*Avoid any adverse impact on national and locally designated assets of conservation, ecological and landscape value and enhance these habitats with the provision of suitably managed buffer zones*."

OLDHAM

JPA12: Beal Valley
The Wildlife Trust for Lancashire, Manchester & North Merseyside recommends that the development of this allocation be considered to be **unsound** for the following reasons:

1. The Trust notes and welcomes the proposal in Allocation Policy 12 to

'*Retain and enhance the hierarchy of biodiversity within the site, notably the existing Shawside SBI, including areas of priority habitats and the Twingates local nature reserve, following the mitigation hierarchy and deliver a meaningful and measurable net gain in biodiversity, integrating them as part of multi-functional green infrastructure network which should ensure the requirements of wading bird populations are met*'.

2. However, the Trust would recommend that a buffer zone between the SBI and the development will be required to fully protect and enhance the SBI. The hydrological effects of development adjacent to a wetland needs to be investigated and mitigated for.

3. Further, the ground-nesting breeding wading bird populations within the SBI will be dependent on sufficient areas of open land. Retaining just the SBI would be insufficient to retain and protect these species populations, much less increase numbers and distribution to achieve net biodiversity gain: consequently, the policy must specify that Green Infrastructure retention and enhancement must be designed around the requirements of these important species populations.
4. The Trust notes and welcomes that the retention of the SBI will be delivered as part of a multi-functional green infrastructure network (incorporating the retention and enhancement of existing public rights of way), with high-quality landscaping within the site and around the main development areas, to minimise the visual impact on the wider landscape and mitigate its environmental impacts. However, we would also add that ground-nesting birds require quiet areas with limited or totally excluded visitor pressure. Mitigation plans must provide an adequate area of such land to support these important bird populations. It is noted that there are significant areas of green infrastructure being provided, so the provision of additional quiet "wildlife only" areas is feasible.
5. The Trust welcomes the commitment for the provision of dedicated surveys of Phase 1 habitats, amphibians, badgers, water voles and bats to inform any planning application. These should also include breeding bird surveys, and especially farmland bird surveys. Interrogation of Natural England's Magic Map indicates the area has been identified for Curlew and Lapwing and identified as an upland breeding bird area for Countryside Stewardship applications. The importance of the site for farmland birds needs to be established and suitable mitigation/compensation provided.
6. *If the above cannot be met then the* **Local Wildlife Site (SBI) and its hydrological buffer must be excluded from the allocation to comply with PfE policies JP-G 2 and JP-G 9 and NPPF (2021) Paragraphs 174a, 174d, 175, 179a, 179b and 180a**.
7. The Trust welcomes the commitment to protect and enhance the habitats and corridor along the River Beal to improve the existing water quality and seek to achieve 'good status' as proposed under the EU Water Framework Directive, including the provision for a wetland catchment area. The Trust welcomes the commitment to provide an opportunity to demonstrate an exemplar development, using green infrastructure that can be designed in a way to support local biodiversity, and strengthen coherent ecological networks beyond the site boundary and include partnership working with appropriate bodies, to ensure that they contribute towards a wider ecological network approach.

JPA 13: Bottom Field Farm (Woodhouses)

The Wildlife Trust for Lancashire, Manchester & North Merseyside recommends that the development of this allocation be considered to be **unsound** for the following reasons:

1. The Trust welcomes the commitment to retain and enhance the hierarchy of biodiversity within the site, following the mitigation hierarchy and deliver a meaningful and measurable net gain in biodiversity, integrating them as part of a multi-functional green infrastructure network with the wider environment; and provide further surveys and assessments on bats, great crested newts and barn owls to inform planning applications. However, no ecological mitigation is provided within the concept plan, which only indicates full development of the site area.
2. The Trust notes that it is acknowledged that the site may have ecological value that would need to be mitigated and integrated into the development as part of a complementary multi-functional green infrastructure and that habitat survey and associated surveys will be required at planning application stage to fully assess ecological impacts and associated

mitigation requirements. The Trust also notes the allocation policy commitment that development should have regard to the ecosystem services opportunity mapping in the improvement and enhancement of Green Infrastructure. The Trust would recommend that provision to mitigate for ecological habitats and species may be required excludes recreational activities to fully mitigate/compensate for any loss of habitat or species interest. The development must demonstrate and secure a 10% net increase in Biodiversity Net Gain.

JPA 14: Broadbent Moss

The Wildlife Trust for Lancashire, Manchester & North Merseyside recommends that the development of this allocation be considered to be **unsound** for the following reasons:

1. A number of ecological features have been identified on the site, including wet marshy grasslands, broadleaved woodland and ponds, and the River Beal running through the centre of the site. The Preliminary Ecological Assessment undertaken by the GMEU states that these habitats would need to be retained and/or compensated for if lost. The Trust supports this recommendation. The Trust therefore notes and welcomes the policy to retain and enhance areas of biodiversity within the site, most notably the priority habitats, following the mitigation hierarchy and to deliver a meaningful and measurable net gain in biodiversity, integrating these features as part of a multi-functional green-infrastructure network with the wider environment.
2. The Topics Paper indicates that a high-level indicative concept plan report has recommended that the existing water features and ponds add ecological value to the site and, where possible, they should be retained and protected during any works. Following completion of the development, enhancement measures should be put in place which should include damp-tolerant wildflower and seed mixes, as well as tree and shrub planting around the edge of ponds. The Trust welcomes this intent but would add that where this is not possible, compensatory habitat would need to be provided that links in with existing ecological assets and connects to the wider ecological networks. The concept plan further identifies that the existing hedgerows have ecological value for local wildlife and where possible they should be retained and enhanced, Again the Trust would add that, where this is demonstrably not feasible, new habitat needs to be created to maintain existing and creation of new corridors. Any loss of hedgerow habitat would have to be replaced and show a 10% BNG.
3. The Trust welcomes the policy to protect and enhance the habitats and corridor along the River Beal to improve the existing water quality and seek to achieve 'good status' as proposed under the EU Water Framework Directive and to demonstrate an exemplar development using green infrastructure, that can be designed in such a way that it can support local biodiversity and strengthen coherent ecological networks beyond the site boundary, creating a resilient landscape through a network of connected sites. This would be important as the two sites, Broadbent Moss and Beal Valley, are contiguous and the cumulative effects of the two developments on ecological assets need to be taken into account and mitigated/compensated for.
4. The Trust notes that the preliminary ecological assessment carried out by the GMEU identified that the site could support Little Ringed Plover, foraging bats, farmland bird communities and, potentially, bats. Recommended surveys include; extended Phase 1 surveys, badger surveys, amphibian surveys and bat surveys. The Trust would add that farmland bird surveys will also be required. A quick interrogation of Natural England's Magic

Map indicated that the area might be important for S41 species such as Curlew and Lapwing. If the site is shown to support these species, mitigation/compensation plans must be provided to show how they are either to be incorporated into the development or identify off-site areas for compensation and how these are to be managed to enhance the area to protect the populations of these S41 species.

JPA 15: Chew Brook Vale (Robert Fletchers)

The Wildlife Trust for Lancashire, Manchester & North Merseyside recommends that the development of this allocation be considered to be **unsound** for the following reasons:

1. The Trust notes that this development has been significantly reduced in size and is now primarily focused on brown field development. However, no survey information has been provided as yet and it is therefore difficult to assess the ecological considerations required.
2. Google® Maps indicates that there are areas of scrub or woodland and some grassland areas within the development boundary: these habitats will need to be mitigated for. The Trust, therefore, welcomes and supports the allocation policy 9 requirement to '*Retain and enhance biodiversity within and adjoining the site, notably the areas of priority habitats, following the mitigation hierarchy and deliver a meaningful and measurable net gain in biodiversity, integrating them as part of the multi-functional green infrastructure network with the wider environment.*'
3. An assessment on the use of the site by bats and breeding birds will be required, as will consideration of the adjacent pond, woodland and watercourse habitats. The Trust notes and welcomes the allocation policy to *'incorporate multi-functional green and blue infrastructure and high levels of landscaping to minimise the visual impact on the wider landscape, mitigate its environmental impacts, and enhance linkages with the neighbouring communities and countryside*.', as well as the commitment to provide further surveys on extended Phase 1 habitats, bats and birds to inform any planning application.
4. The Trust welcomes and supports policy 11 '*Ensure that development does not have an adverse impact on the integrity of the nearby Special Protection Area (SPA) and Special Area of Conservation (SAC). The recommendations from the Habitat Regulations Assessment must be considered*'.
5. The integration of the site with the surrounding landscape is vital: we therefore welcome policy 12; '*Be designed to relate positively to Chew Brook and other watercourses running through the site, integrating them as part of a multi-functional green infrastructure network, creating a green route along the river / brook, ensuring that development is set back to allow ecological movement*' and policy 13; ' *Provide for opportunities to protect and enhance the habitats and corridor along Chew Brook to improve the existing water quality and seek to achieve 'good' status as proposed under the EU Water Framework Directive*.'
6. The Trust would add that, given the upland riverside location, the policy should also include a requirement for built design driven by the biological environment – such as green roofs and walls, permeable surfacing, swallow-eaves, and bat-tiles.
7. The Trust also welcomes policy text 11.176; *Development should have regard to the ecosystem services opportunity mapping, in the improvement and enhancement of Green Infrastructure* and Policy *Development must follow the legal and policy requirements of protecting irreplaceable habitats and the mitigation hierarchy of doing everything possible to avoid and then minimise the impact on biodiversity, and only then after first taking all measures to compensate for losses that cannot be avoided. Meaningful biodiversity net gain is then applied on top of this approach*.

JPA 16: Cowlishaw

The Wildlife Trust for Lancashire, Manchester & North Merseyside recommends that the development of this allocation be considered to be **unsound**: our reasoning follows.

1. The Trust notes the presence of existing areas of biodiversity interest, notably the '*Ponds at Cowlishaw Farm*' SBI, as well as priority deciduous woodland habitat.
2. The Trust therefore welcomes JP Allocation 8: which sets out that the development of the site is required to retain and enhance the hierarchy of biodiversity within the site, notably the existing Cowlishaw Ponds SBI and the area of priority habitat to the south of Crompton Primary School, following the mitigation hierarchy and deliver a meaningful and measurable net gain in biodiversity, integrating them as part of the multi-functional green infrastructure network with the wider environment.
3. We also welcome Policy 9 that requires the provision of further surveys on amphibians (including great crested newts), extended Phase 1 habitat, breeding birds, badgers and bats to inform any planning application. As identified by the Topics paper, the SBI is made up of 3 pond areas, with additional priority habitat to the south of the school. We therefore welcome the commitment that any development will need to retain and enhance these, incorporating them as a key feature within the green infrastructure network and landscaping proposals for the site, as well that biodiversity net gain could be applied to Green Infrastructure, deciduous woodland, lowland fen and protected species' and '*Development should have regard to the ecosystem services opportunity mapping, in the improvement and enhancement of Green Infrastructure*'.
4. <u>However, the Trust notes that the preliminary ecological report identifies that the site supports farmland bird assemblages such as Curlew and Lapwing. The Trust would therefore add that farmland bird surveys will also be required. A quick interrogation of Natural England's Magic Map also indicated that the area might be important for Curlew and Lapwing. These S41 species are a material consideration within planning decisions. If the site is shown to support these species, mitigation/compensation plans must be provided to show how they are either to be incorporated into the development or identify off-site areas for compensation and how these are to be managed to enhance the area to protect the populations of these S41 species.</u>
5. Magic Map also indicated that some of the woodland areas within the allocation are currently being managed under a woodland grant scheme. This may influence any planning condition attached to the wood areas. Extra mitigation may therefore be required.

JPA 17: Land South of Coal Pit Lane (Ashton Road)

1. The topic paper describes the site as being large areas of open land with a small woodland area to the north-east with hedgerows around the centre and to the south of the site. The ecological appraisal indicates that Great Crested Newts, Badgers and bats may also be affected. The ecological appraisal also indicates that ponds are contained within the site. It will be important that the design of the development protects and enhances the existing habitat. Brownfield sites on former coal mining can create valuable habitat such as scrub, acid grassland and heathland. A full ecological survey is required to identify important habitat. The Trust therefore welcomes policy 9 to provide further surveys on amphibians, extended Phase 1 habitats, badgers and bats to inform any planning application.
2. As indicated the existing ecological features must be protected or compensated for to provide a 10% biodiversity uplift. The Trust therefore welcomes the policies to retain and

enhance the hierarchy of biodiversity within the site, notably areas of priority habitats, following the mitigation hierarchy and deliver a meaningful and measurable net gain in biodiversity, integrating them as part of the multi-functional green infrastructure network. We also welcome sections 11.199 and 11.200 within the allocation policies that the allocation provides opportunities to secure net gains for nature. This should be applied to green infrastructure and priority habitats and that development should have regard to the ecosystem services opportunity mapping, in the improvement and enhancement of Green Infrastructure.

3. There would be a presumption against the loss of ponds and woodland. If these features are lost compensation would be required. It is important that these areas are retained and incorporated within the development. The Trust therefore welcomes policy clause 8; *Retain and enhance the hierarchy of biodiversity within the site, notably areas of priority habitats, following the mitigation hierarchy and deliver a meaningful and measurable net gain in biodiversity, integrating them as part of the multi-functional green infrastructure network* and policy clause 9 to provide further surveys on amphibians, extended phase 1 habitats, badgers and bats to inform any planning application.

4. We also welcome policy clause 6 to deliver multi-functional green infrastructure (incorporating the retention and enhancement of existing public rights of way) and high-quality landscaping within the site so as to minimise the visual impact on the wider landscape, mitigate its environmental impacts, enhance linkages with the neighbouring communities and countryside and provide opportunities for leisure and recreation. The Trust would add that the requirements for biodiversity and maintaining enhancing ecological linkages be added here.

JPA 18: South of Rosary Road

1. The Trust notes that part of the site already has planning permission.
2. However, the allocation does impinge upon Little Bankfield Site of Biological Importance (SBI). The preliminary ecological appraisal also indicates there are foraging bats and possible badger within the allocation area, as well as woodland, which is a priority habitat.
3. The Trust therefore welcomes policy clause 6 to retain and enhance the hierarchy of biodiversity within the site, notably Bankfield Clough SBI and the area of priority habitat, following the mitigation hierarchy and deliver a meaningful and measurable net gain in biodiversity, integrating the delivery of functional ecological networks into multi-functional green infrastructure to enable free movement of species of principal importance. Planning proposals should incorporate a suitable buffer between development plots and the SBI to protect its important features.
4. We also welcome policy 7 to Provide further surveys on extended phase 1 habitats and bats, to inform any planning application. The Trust would add that a suitable buffer zone should be incorporated within the development to protect and enhance the important features of the SBI.
5. We also welcome sections 11.209 and 11.210 within the allocations policy subtext that acknowledge that Bankfield Clough SBI and an area of priority habitat fall within the site along the eastern boundary and that this area should form part of the wider landscaping and green infrastructure network for the site and be retained and enhanced as part of the biodiversity hierarchy within the site and that development should have regard to the ecosystem services opportunity mapping, in the improvement and enhancement of Green Infrastructure.

ROCHDALE

JPA 19: Bamford/Norden

The Wildlife Trust for Lancashire, Manchester & North Merseyside recommends that the development of this allocation be considered to be **unsound** for the following reasons:

1. The Trust notes that the ecological appraisal's desk top search identified a number of Section 41 bird species, including farmland birds such as Curlew and Skylark, that require large open and undisturbed grassland.
2. Whilst we note that the no ground-nesting birds were observed within the site during the survey, the ecological appraisal assessed that the site does provide suitable habitat for ground-nesting species such as lapwing, skylark which have been recorded in the wider area. The dense stands of rushes provide opportunities for nesting and wintering snipe. Interrogation of Natural England's Magic Map indicates that the site and immediate area is identified as an area for targeting Countryside Stewardship schemes for both Lapwing and Curlew. These species should, therefore, be considered as priority species for mitigation and net gain. Full breeding and wintering bird surveys will be required to assess if these fields are being used by S41 species and the results and assessment will then need to drive what mitigation/compensation will be required.
3. The preliminary ecological appraisal (PEA) undertaken by the consultant ecologists suggest that a number of mitigation measures will be required at the planning stage to ensure that the site retains and enhances its value to wildlife. The Trust welcomes the suggestions to retain and protect the habitats identified as being of ecological value such as wooded areas of wet rush and hedgerows and agree that these should connect with the wider countryside. As also suggested, unavoidable losses must be adequately compensated for by replacement planting. The BNG mitigation hierarchy of avoid, mitigate and finally compensate must be followed. The Trust agrees with the (PEA) that the site design must seek to retain and enhance wildlife corridors and habitat connectivity across the site by connecting woodland habitat and also by linking retained areas of dense rushes as part of a Sustainable Urban Development Scheme. The Trust agrees that additional ecologically valuable habitat such as species-rich wildflower grassland and provision of ponds would enhance the biodiversity of the site.
4. The Trust particularly welcomes the recommendation that a portion of the site, most suitably on the site margin, is allocated for continued application of agricultural management to provide continued opportunities for ground nesting birds and other fauna such as invertebrates. The amount and area required will be determined by the bird surveys so that population sizes are maintained/enhanced.
5. The Trust also welcomes the commitment to the long-term management of the retained habitats (such as hedgerows, rushy areas as part of the SuDS and woodland), as this is a requirement under BNG.
6. The (PEA) concludes that at this stage, it is considered that mitigation for protected species and other notable species such as Priority Species, if present, is entirely feasible. This however would be dependent on the results of the farmland bird survey which will determine the area of land required to accommodate the mitigation required for ground nesting birds.

JPA 20: Castleton Siding

The Wildlife Trust for Lancashire, Manchester & North Merseyside recommends that the development of this allocation be considered to be **unsound** for the following reasons:

1. The allocation would result in the loss of Green Belt and green infrastructure.
2. Whilst Policy subtext 11.222 states that the redevelopment of the site as a whole does offer the opportunity to create a high-quality area of open space or an area for nature conservation on the western part of the site, there are currently no specific on how this will be achieved or where the current biodiversity interest or ecological features would lie in relation to the development type proposed.

3. We also feel that "*the western part of the site will be redeveloped as an area of open space OR nature conservation area*" (our emphasis) is unnecessarily binary unless nature conservation and open space use are specifically incompatible at this location. Open space use and nature conservation use are not necessarily incompatible, depending on the particular sensitivities of the specific habitats or species which are to be conserved, expanded and enhanced. We would prefer the wording "the *western part of the site will be redeveloped as an area integrating nature conservation and public access, unless there are areas of demonstrable incompatibility".*
4. There needs to be a greater emphasis on the provision of ecological corridors to maintain links and connections with the wider environment. BNG gains need to be identified and this can only be achieved through detailed surveys and descriptions of the current biodiversity interest.
5. GMEU's ecological appraisal identifies the possibility of bats, Common Lizard (a UK Priority Species) and badgers. The report also highlights the presence of species rich grasslands and broadleaved woodland. These ecological features need to be protected and enhanced as part of the development. Mitigation and management plans will need to be provided that show how these features are protected and/or compensated for. A long-term maintenance plan will also be required and delivered.
6. The effects of the development on the adjacent Rochdale Canal will also need to be considered.

JPA 21: Crimble Mill

The Wildlife Trust for Lancashire, Manchester & North Merseyside recommends that the development of this allocation be considered to be **unsound** for the following reasons:

1. The GMEU Preliminary Ecological appraisal indicates that there is no Site of Biological Importance within the allocation area, however, the separate ecological report states that both Plumpton Wood Site of Biological Importance (SBI) and Meadowcroft Woods SBI lie partially within the site boundary. If SBI's are located within the site boundary they must be either excluded from the allocation or protected and an appropriate buffer provided as outlined within the site delivery plan, to comply with PfE policies JP-G 2 and JP-G 9 and NPPF (2021) Paragraphs 174a, 174d, 175, 179a, 179b and 180a.
2. The ecology report indicates that the site is comprised of improved grasslands, with hedgerows as field boundaries. The report also indicates some areas of marshy grassland and seasonally flooded grasslands as well as broadleaved woodland within the north east and north west of the site. The Trust notes the intent to retain hedgerows where possible. The Trust would add that where this is not possible replacement hedgerow of equal ecological value needs to be created as part of the BNG requirements for 10% net gain.
3. The Trust also notes the intent to retain and manage the area of seasonal flooding for its biodiversity interest, as well as retaining the areas of woodland habitat. The Trust welcomes that a long-term management plan would be produced to maintain the

habitats in line with conservation objectives. This is also a requirement of achieving BNG. The development will result in a significant loss of Green Infrastructure and the mitigation must be shown to provide at least a 10% BNG and this must be deliverable and measurable. A plan showing how the retained and newly created habitat is to ensure that fully functioning ecologically connected corridors are to be maintained

4. In addition, the Trust would add that the ecological network functionality of the River Roch must be maintained and enhanced. We note that the draft allocation policy 5 refers to this, and also includes the incorporation of high-quality green and blue infrastructure. However, that would appear to relate to historical landscape aesthetics only and not to ecological functionality.
5. The ecology section within the site delivery plan concludes that there are no significant ecological constraints within the site and that the proposals will secure an opportunity to implement beneficial measures such as habitat management and habitat creation that will safeguard habitats for wildlife such as invertebrates, birds and bats, with the aim of providing a net gain in biodiversity in accordance with the principles of the Framework.
6. However, the Trust is concerned that the direct impact of the development on potential of the habitats for farmland birds has not been explored. A quick interrogation of Natural England's Magic Map indicates that the site and the immediate area has been identified for targeting lapwing within Countryside Stewardship agreements and that the area is important for its arable assemblages of farmland birds. Whilst this does not mean these S41 bird species are present within the site, it is important that full breeding bird surveys, including for farmland birds is carried out and that the results drive any mitigation plan to be delivered. S41 species can be considered as a material consideration and their presence or absence is required. The Trust notes that the GMEU has also requested that phase one surveys, bat and badger surveys be required.

JPA 22: Land North of Smithy Bridge

The Wildlife Trust for Lancashire, Manchester & North Merseyside recommends that the development of this allocation be considered to be **unsound** for the following reasons:

1. The Ecology Technical Note indicates that the site mainly comprises horse and cattle grazed grassland, with some areas of marshy grassland. The report also indicated that no protected or priority species data has been requested or received from the local records centre and that this data should be obtained to help inform required surveys and potential impacts on species. The Trust is in full agreement with this statement.
2. The ecology report further indicates that the site has the potential to support populations of wintering birds including waders using the lake and pond adjacent to site, as well as the species for which the South Pennines SPA is designated. As such, wintering bird surveys and breeding bird surveys will be required at the site to inform any necessary mitigation. Again, the Trust is in full agreement with this statement.
3. A quick interrogation of Natural England's Magic Map indicates that the site and the immediate area has been identified as a Countryside Stewardship targeting area for Lapwing, Redshank and Snipe and as an area for upland breeding birds as well as grassland assemblages of farmland birds. Farmland birds identified include; Curlew, Grey Partridge, Lapwing, Redshank, Snipe and Twite. Clearly the site has a huge potential to support important assemblages of S41 bird species. These S41 species are

a material consideration within planning decisions. If the site is shown to support these species, mitigation/compensation plans must be provided to show how they are either to be incorporated into the development or identify off-site areas for compensation and how these are to be managed to enhance the area to protect the populations of these S41 species. If the site is shown to support these species and the development cannot provide for them within the development area, then off-site areas need to be identified where appropriate management can be undertaken to ensure the maintenance of the breeding population. To fully understand the level of impact both full breeding bird surveys and winter bird surveys should be carried out along with surveys of potential compensation areas to demonstrate that displacement is possible into the wider landscape.

4. The Vision document within the supplementary information provided indicates that any required mitigation can be accommodated within the extensive green infrastructure (GI) proposals within the site. The development design seeks to retain and enhance those features of highest ecological value, including the pond, dry stone walls and hedgerows. Anticipated losses of any trees would be mitigated through the planting of native trees and shrubs within the site, and any risks to retained habitats (and the adjacent Rochdale Canal) would be controlled through the implementation of a Construction Environmental Management Plan.
5. The Vison document further states that 'In terms of opportunities, the GI provision will provide an important corridor for species moving through the site between Hollingworth Lake and Rochdale Canal. Other opportunities include the: enhancement / management of the pond for GCN (if present) and floating water plantain; provision of hedgehog-friendly fencing as well as bat, barn owl and bird boxes within the new development; and enhancement of boundary trees and hedgerows – these are aspirations which tie in with those described in the 'Biodiversity and Development SPD.
6. The Trust would add that in terms of BNG the allocation must follow the mitigation hierarchy of avoid - mitigate – compensate and the development must show at least a 10% biodiversity net gain. All retained and newly created habitats must provide fully functioning ecologically connected corridors that link into the wider ecological network. As stated above, if the site is shown to be important for farmland birds then large areas of open and undisturbed grassland will need to be retained/created as part of the mitigation plan.
7. The Trust notes that Natural England's Magic Map also indicates that an area in the southern part of the site is currently within a woodland grant scheme and this might alter mitigation plans for this woodland area.

JPA 23: Newhey Quarry

The Wildlife Trust for Lancashire, Manchester & North Merseyside recommends that the development of this allocation be considered to be **unsound** for the following reasons:

1. The GMEU preliminary ecological appraisal indicates that the site may support common lizards and great crested newts along with other specially protected species. Heathland and acid grassland, as has broadleaved woodland and pond habitat have been identified as being present within the allocation site. The protection of these species and habitats is paramount and the current policies on protecting these important ecological features is very vague. The presence of protected species is a

major constrain to the development proposal. A detailed mitigation plan showing how the identified key biodiversity features are to be protected and enhanced is needed. The Trust notes that allocation policy 4 indicates that water features will be incorporated into the development and that biodiversity will be safeguarded and enhanced, and that policy 5 seeks to ensure that the reprofiled quarry face takes the opportunity to incorporate biodiversity. However, there is nothing on the indicative master plan that shows any provision for protection of important habitat nor for provision of habitat for protected species. This needs to be rectified.

2. The GMEU appraisal identifies that previous ecological assessments were undertaken in 2019. Why have these not been provided as part of the supplementary information. Details of the extent and location of habitats and species need to be known before BNG can be assured. The Trust has concerns that the reprofiling of the cliff face could adversely affect the sites biodiversity interest. Without this survey information it is impossible to ensure that the biodiversity interest is protected. The Trust notes that GMEU have recommended further surveys of the site to steer the mitigation plans. The Trust fully supports this view.
3. The Trust notes that the proposed allocation would risk a significant narrowing of an identified Green Infrastructure corridor. Whilst allocation policy 11.238 indicates that within the layout of the site, it will be important to incorporate a high-quality green and blue infrastructure network and attractive open spaces and maximise opportunities presented by the quarry face, even where re-profiling of the quarry face is necessary. This should reflect and utilise the features within the site to create attractive and usable spaces for new and existing residents. However, there is no specific mention or indication that these networks will need to enhance ecological connectivity. The design and reshaping of the cliff face will also need to ensure that there is no negative effect on identified ecological features.

JPA 24: Roch Valley

The Wildlife Trust for Lancashire, Manchester & North Merseyside recommends that the development of this allocation be considered to be **unsound** for the following reasons.

1. Although the GMEU ecological appraisal indicates that overall ecological constraints are limited, the report also indicates that further surveys are required so that mitigation and/or compensation may be required for some species. The topics paper also indicates that detailed Ecological Appraisal has been undertaken in support of the planning application, (the decision of which is pending) and that seeks to minimise the impact of any development on the nature conservation value of the area.
2. Why have these ecological surveys/findings or recommendations not been provided as part of the supplementary information to inform the allocation plan?
3. What species or habitats have been identified as being important and why?
4. How are these to be protected?
5. A quick interrogation of Natural England's Magic Map indicates that the site and area could be important for S41 bird species including; Lapwing, Redshank, Snipe, Curlew and Grey Partridge. The Maps also indicate that the area is important for its assemblages of farmland birds. It is acknowledged that the habitat might not be suitable for these species, but what survey data has been presented to evidence the use of the site by such species. Without this data it is very difficult to make representation on the allocation.

6. The Trust also notes that the development will also reduce the width of identified GI east to west. The site allocation is situated within the GI opportunities area. The Trust Notes Policy 4 to "*Have regard to the river valley setting in terms of the design and layout, particularly in relation to the materials uses, the incorporation of green and blue infrastructure and the landscaping along the boundary of the site".* However, there is not ecological strategy to maintain and enhance ecological networks in the area. This needs ot be provided as part of a detailed mitigation plan. The Mitigation/ecology plan needs to show how any identified ecological feature is to be protected, retained or compensated for. HRA may also be needed for possible indirect recreational disturbance effects on the South Pennines SAC/SP

Policy JPA 27: Trows Farm

The Wildlife Trust for Lancashire, Manchester & North Merseyside recommends that the development of this allocation be considered to be **unsound** for the following reasons:

1. The Trust notes that the GMEU ecological appraisal supports roosting and foraging bats, amphibians, badgers as well as identified ecological features such as; ponds. Species rich grasslands, woodland and trees. It is noted that ecological assessments have been provided to inform pre-application planning, yet no data has been supplied as part of the supplementary information as part of the site allocation process. The technical summary survey report indicates that the site is composed of poor semi-improved grasslands, with marsh grassland and dense scrub throughout. This is in conflict with the GMEU appraisal. The report indicates the ecology surveys have identified wildlife species have been identified at the site but that this does not represent a constraint to the future development of the site. However, no indication has been provided as to what species have been recorded. The report also indicates that "the semi-improved grassland habitats on the site have been subject to low intensity grazing and plant species identified are common and widespread with no locally rare species notes. It is not envisaged these habitats would qualify under the National Vegetation Classification (NVC)". The report does not provide a conclusion as to what the grassland does not quality as. NVC is a way of classifying grasslands into habitat types. All grasslands can be classified. No indication as to grassland type is provided.
2. The GMEU report recommends that the woodland, wet grassland and ponds would need to be retained or compensated for if lost. The site-promotion technical surveys indicate that to minimise the loss of biodiversity, including the marshy grasslands and hedgerows, these should be retained where possible and that if they are lost then consideration will be given to replacement planting within the scheme. This is not sufficient in terms of biodiversity provision. Where features of ecological interest cannot be retained then replacement habitat must be provided and that this provision must ensure at least a 10% biodiversity net gain. Hedgerows must similarly be replaced to ensure a 10% BNG in linear hedgerow habitat. The process must follow the Biodiversity Net Gain (BNG) mitigation hierarchy of avoid - mitigate - compensate. Compensation should only be seen as a last resort, and, where possible, undertaken in agreement with external decision-makers to compensate for losses that cannot be avoided.

3. The technical survey summaries indicate that the site is of local significance for breeding birds. Whilst some recommendation is made, no data is provided to show which species are affected.
4. Are any of these S41 species?
5. Is the mitigation appropriate to retain and enhance these specific species?
6. The GMEU recommend that further specific surveys are required. These must be undertaken to inform any mitigation plans produced. To comply with BNG objectives, these mitigation plans must be detailed and provide for long-term maintenance of biodiversity features.
7. The Trust notes and welcomes Policy 6; to deliver a well-designed scheme which incorporates good quality green and blue infrastructure having regard to existing biodiversity and greenspace corridors.

SALFORD

JPA26: Land at Hazelhurst Farm

The Wildlife Trust for Lancashire, Manchester & North Merseyside recommends that the development of this allocation be considered to be **unsound** for the following reasons:

1. The Trust notes and welcomes the policy to protect and enhance Worsley Woods SBI. However, detailed avoidance and mitigation plans will need to be provided at the planning stage. The Trust also agrees that the proposal would be likely to result in a significant increase in recreational pressures on the SBI. The ecological report identifies that mitigation measures may be needed to reduce this. The Trust believes this should be changed to ***mitigation measures*** **would** ***be needed to reduce this.*** Significant open space will need to be provided within the development to provide for recreation and simultaneously alleviate pressures from the SBI.
2. The ecological reports have identified a number of ecological constraints present within the site, including; broad-leaved woodland, hedgerows, marshy grassland and 10 ponds contained within the application boundary. The current survey data is out of date and we agree with the ecological reports that more detailed, accurate and up to date survey information will need to be provided.
3. Great Crested newts have been recorded within the site and specific GGN surveys will need to be undertaken.
4. The Trust agrees with the ecology reports that these habitats are of high conservation value and that any future development of the site should be designed to retain and enhance these features. The identified value habitat is part of the identified green infrastructure connecting areas to the south. The site is also within the green infrastructure opportunity area and it is therefore important that the retained ecological features are linked with appropriately enhanced habitat and that this is also linked to the wider ecological networks.
5. The Trust would question the TEP survey, which concludes that the marshy area did not qualify as priority habitat. Natural England has identified this on its priority habitat inventory as lowland fen. The quality of this habitat needs to be investigated and identified accurately.
6. The Trust notes that no bird surveys have been undertaken as yet on the site. The ecological reports show that several S41 species have been identified within the area. We would draw particular attention to the presence of Willow Tit, a UK Red Alert Species. Policy measures would need to be put in place to deliver the protection and

expansion of the local population of this species as part of a strategic approach to population recovery across Greater Manchester and beyond.

7. Interrogation of Natural England's Magic Map also identified the area for Lapwing. The main habitat on the site is arable fields and it will be vital that up to date and accurate bird surveys are undertaken to identify the presence of any farmland birds that might be adversely affected by the proposed development. Any mitigation/compensation plans must show how identified ecological features such as farmland birds can be incorporated into the development. Where this is not possible, off-site compensation must be identified.
8. Magic Map also identified that Wardley Wood is currently within a Forestry England Woodland Grant Scheme and the impact of this on any proposed mitigation needs to be assessed.

JPA27: East of Boothstown

The Wildlife Trust for Lancashire, Manchester & North Merseyside recommends that the development of this allocation be considered to be **unsound** for the following reasons:

1. The Trust notes the retention of Alder Wood and the other areas of mature woodland and welcomes the retention of significant open land around Shaw Brook. However, there is no mention of the retention of the marshy grassland or pond habitat. These need to be retained or compensated for by the provision of suitable replacement habitat.
2. The Trust notes and welcomes the intent to retain wildlife corridors that are protected by habitat buffers. These corridors must also link any newly created habitat as well as connecting to the wider ecological network.
3. The Trust notes that records of Water Vole have been returned for Shaw Brook. The allocation supporting text refers the need to undertake Water Vole surveys prior to development. However, within the policy there must be a commitment to protect and enhance the banks of the brook for Water Vole. Any new water features such as swales should also seek to provide suitable habitat for Water Vole.
4. It is noted that no ecological surveys have been undertaken on the site and the current data is old and out of date. Appropriate species surveys must be undertaken at the earliest opportunity to identify key biodiversity assets. The Trust notes the intent to undertake bird surveys as part of the planning process. The Trust would therefore particularly draw attention to the known presence of an abundant population of breeding Willow Tit in this allocation area. The UK Rare Breeding Birds Panel announced earlier this year that willow tits are now down to just 2,000 breeding pairs within the United Kingdom. The UK population has fallen by 90 per cent over the past 30 years, placing it on the 'red list' of species of conservation concern. More than 10 per cent of the UK's willow tits live in the area around Salford, Wigan, St Helens, Warrington and Chorley districts. Willow tits would likely be extinct in the northwest of England without the continuing viability of this central population grouping in the Lowland Wetlands of Greater Manchester: the city region needs to maintain and improve viable links outward from this hub to contribute to the national effort on recovery of this species. Much of the willow tits' population decline is down to loss of habitat, with developers and land-managers often seeing no merit in the willow scrub which these birds breed. There are potential opportunities here for restoration and

enhancement of severed north-south ecological network links: for example, willow tits are characteristically reluctant to travel more than about 300m from one area of willow scrub to another.

5. We are advised (South Lancashire Bat Group) that there is a substantial population of Daubenton's Bat associated with this area. Similar considerations apply as to those outlined for Willow Tit above.
6. We are further advised (Mike Wilkinson, Greater Manchester Bird Recording Group) that the area supports a regionally significant population of ground-nesting wading birds, for which records have been submitted to the Greater Manchester Local (Biological) Records Centre. The policy should, therefore, specifically require robust proposals for avoidance, mitigation or compensation in respect of any breeding and foraging habitat for these UK Red List species that would be lost as the result of any development that may be brought forward for determination.
7. The Trust notes that the ecological report shows that grasslands dominate the site and identifies these areas as low constraint to development. The Trust strongly disagrees with this statement. These grassland areas could support a range of S41 farmland birds. Interrogation of Natural England's Magic map identifies the area for important bird species such as Corn Bunting, Grey Partridge, Lapwing, Tree Sparrow and Yellow Wagtail. Magic Map also identifies the area for arable and grassland assemblages of farmland birds. Clearly, as identified above by the GMBRG this area is significantly important for its range of farmland birds, many of which are reliant on the grasslands identified as low constraint.
8. The TEP report also concludes that the loss of grassland would result in the reduction in range for farmland bird species, yet concludes without any current survey data that the site does not appear to be a stronghold for these species. The report also states that the provision of new habitat would be capable of supporting populations of S41 bird, albeit not the same assemblages of species that would be displaced from the farmed area. The Trust belies this is not an acceptable form of compensation. S41 species are a material consideration in planning development and their loss without compensation would merit refusal, and as such they should be considered as a potential constraint on the proposed allocation. Mitigation and enhancement plans must be provided and must show how these species are to benefit from the development of the site. If these species cannot be adequately mitigated on site, then off-site mitigation must be provided. Suitable compensation areas need to be identified and managed to enhance the populations of the identified S41 bird species.
9. The Trust notes the reference to PfE Policy JP-G9 that a net enhancement of biodiversity resources will be sought across the plan as a whole. This does not mean that any individual allocation can provide less, as another allocation has provided more. Each allocation must ensure a 10% BNG and this must be in addition to the protection and enhancement of S41 species identified.
10. The Trust would also argue that the provision for offsite compensation should prioritise the S41 species adversely affected, such as farmland birds and Willow Tit. The justification for this site is that restoration of lowland raised bog and complimentary habitats in Chat Moss would be undertaken as off-site compensation. However, any off-site compensation must provide for the priority species identified.
11. The Trust notes clause 9 of this policy, which supports the objectives for the Great Manchester Wetlands Nature Improvement Area and avoid harm to protected species. The presumed intent of the requirement is welcome; particularly, of course, since

both Cheshire Wildlife Trust and The Wildlife Trust for Lancashire Manchester & North Merseyside itself have high degrees of commitment to the mosslands area of the Great Manchester Wetlands Nature Improvement Area as a whole. The Trust would point out that these objectives include the protection and enhancement of areas supporting wading birds such as those identified within the development area.

JPA28: North of Irlam Station

The Wildlife Trust for Lancashire, Manchester & North Merseyside recommends that the development of this allocation be considered to be **unsound**: our reasoning follows:

1. **This allocation policy conflicts with the England Peat Action Plan, Places for People Policy JP-S 2 Carbon and Energy, para 6; Policy JP-G 4 Lowland Wetlands and Mosslands, para 2 and NPPF Para 161c as it will directly result in a reduction of the amount of peat-based habitat available for restoration in the PfE area.**
2. Allocation of this site also conflicts with PfE Policy JP-G 2 and NPPF Para 175 as part of the site sits within the GMSF Green Infrastructure network.
3. Securing a measurable biodiversity net gain of 10% for this site, in line with PfE Policy JP-G 9 and NPPF Paragraphs 174d and 179b, may not be possible due to the current high value of the site, particularly depending on the extent of the remaining peat deposits.
4. The allocation site sits within deep peaty soils. Although largely degraded to agriculture, it is highly likely that substantial areas of the peat body associated with the relict lowland raised bog of historic Chat Moss still exists. Should the site be subject to development of the scale proposed a significant proportion of the peat would potentially be required to be removed to facilitate construction. This is often assessed in an Environmental Impact Assessment, within the climate section, and referred to as GHG emissions arising as a result of land use change. In the case of peat soils, GHG emissions (both during construction and operation) are often a significant factor when determining the impact of land use change on the climate.
5. If peat extraction is required, and it has not already been factored into the GM Carbon Neutrality targets and budgets (which we suspect it hasn't), it would significantly impact on the ability of Greater Manchester to achieve the goal of becoming carbon neutral by 2038 (Policy JP-S 2). Any assessment of Greater Manchester's path to carbon neutrality that does not take account of the potential requirement for peat extraction at this allocation would be highly inaccurate, disingenuous and undermine the aspiration of the combined authority to become carbon neutral by 2038. Locating this allocation on deep peat also contradicts NPPF Para 154b.
6. The allocation contradicts PfE Policies JP-S 2, JP-G 4 and NPPF Para 161c as it will directly result in a reduction of the amount of peat-based habitat available for restoration in the PfE area. As part of the largest lowland peat body in the GMCA area, rather than allocate the site for development, this area would be a much more suitable location for the delivery of high-quality green infrastructure and natural capital solutions to offset the effects of the allocations proposed in the wider PfE area and localised impacts arising as a result of climate change, as well as keeping carbon in the ground and providing resilience to the effects of climate change. It is one of a very limited number of undeveloped sites in the PfE area that can deliver alternative multi-functional benefits (as per NPPF Para 120b) and therefore an alternative strategy to this Allocation must be investigated as a matter of priority.

7. If, as in another proposed area allocation on peat (New Carrrington), the technique for development on peat soils is to mix the peat with concrete as a binder, this would continue to release carbon.

8. The Trust notes the reduced area of this allocation from the original application. This area is known to support a range of Section 41 species. The GMEU's ecological appraisal identified a number of farmland species within the area that might be affected such as Lapwing, Brown Hare, Curlew, Grey Partridge, Skylark, Yellow Wagtail, Linnet, Yellowhammer, Reed Bunting, Barn Owl and Willow Tit. Water Vole have also been recorded in the area. Clearly the area is of huge significance to a range of priority species. The Trust therefore welcomes and supports this policy's clause 12 that states that the allocation needs to be supported by breeding and winter bird surveys to understand and minimise any adverse impact on bird species in this area. Surveys of potential compensation areas should also be undertaken to demonstrate that displacement into the wider landscape is possible. We would add that any compensation area identified must be managed and maintained under an appropriate long-term management plan.

9. The Trust support and agree with the appraisal's recommendation that:

- An Appropriate Assessment as defined under the Habitat Regulations due to the close proximity of the site to the Manchester Mosses SAC is carried out.
- In line with the proposals in the withdrawn draft GMSF, New Moss Wood should be protected and enhanced.
- In line with the proposals in the withdrawn draft GMSF, the Glaze Brook Valley should be protected and enhanced as strategically important blue/green infrastructure.
- Any residential development west of or linked to Moss Road should contribute towards the protection from increased recreational pressure and enhancement of the biodiversity of Great Woolden Wood SBI.
- Land should be identified, within a draft masterplan with evidence of landowner control and willingness to engage, either on or off-site for ecological mitigation prior to any development proposals.

10. The Trust notes allocation policy 1 that states that that, central to the master plan for the development, shall be the consideration of opportunities to restore habitats and strengthen ecological networks. However, this should be a commitment and not just a consideration. The development must deliver opportunities to restore habitats and strengthen ecological networks.
11. The Trust welcomes policy clause 10 that commits to achieve a minimum 10% net gain in biodiversity, and mitigate the environmental impacts of development. However, our comments regarding the incorporation of S41 bird species needs to be included within this commitment.
12. The Trust notes policy clause 11 that provides support for the objectives for the Great Manchester Wetlands Nature Improvement Area and avoidance of harm to protected species. The presumed intent of the requirement is welcome; particularly, of course, since Cheshire Wildlife Trust and The Wildlife Trust for Lancashire Manchester & North Merseyside itself have a high degree of commitment to the mosslands area of the Great Manchester Wetlands Nature Improvement Area. The Trust would point out that these objectives include the protection and enhancement of areas supporting wading birds, such as those identified within the development area.

13. The Trust notes that Salford City Council's Ground Conditions Summary concludes that the land is located in an area where peat deposits could potentially make development difficult, or unfeasible. Records from existing boreholes show that the peat depth ranges from 0.9 to 5.9m. The summary report states that the peat depths, however, have the potential to cause a significant constraint on future development. If peat is found to extend to significant depths over large areas of the site, development may be unviable. The Geotechnical conclusion also warned that there was a potential risk of ground gas (methane) and the possibility of localised ground contamination. Clearly the development of the site requires a huge amount of investigation.
14. The reports concluded that "*Whilst the data is relatively limited, there is currently no reason to conclude the site cannot be developed as intended, using alternative foundation technologies which exist*." Soil mixing using concrete as a binder was viewed as the preferred and best method of dealing with the on-site peat and was considered as the best option of reducing carbon emissions. However, we believe that carbon will still be lost using this method and that this is contrary to the Defra Peat Action Plan as well as policies within the Places for People Strategy that aims to protect peat-based soils, *i.e.* Policy JP-S 2 Carbon and Energy, para 6; Policy JP-G 4 Lowland Wetlands and Mosslands, para 2 and NPPF Para 161c as it will directly result in a reduction of the amount of peat-based habitat available for restoration in the PfE area
15. **England's Peat Action Plan** states that all uses of peatland should keep the peat wet and in the ground. The action plan highlights that peatlands are susceptible to development pressures: and it is vital that planning policies reflect the importance of peatlands for climate, water and biodiversity. Biodiversity net gain recognises the ecological value of peat with high or very high distinctiveness and as non-replaceable habitat. This means that there is a strong incentive for development to retain peatland habitats and to avoid damage to them in the first place (in line with the mitigation hierarchy). Any unavoidable losses or damage to non-irreplaceable habitat would need to be compensated for, ideally on site or locally. It is the Trusts view that all identified areas of peat should remain undeveloped and mitigation/compensation for the development should be on site. The restorable potential of the peat soils has not yet been investigated. The peat plan seeks to protect peatlands, including those which are damaged but recoverable, from potentially damaging development that would hinder restoration and recovery of the habitats and species. The plan will also consider how we can strengthen the protection afforded to peatlands in national planning policy, guided by the development of new tools such as the new England peat map and the Natural Capital Ecosystem Assessment Pilot.

JPA29: Port Salford Extension

The Wildlife Trust for Lancashire, Manchester & North Merseyside recommends that the development of this allocation be considered to be **unsound** for the following reasons:

1. **The allocation contradicts PfE Policies JP-S 2, JP-G 4 and NPPF Para 161c as it will directly result in a reduction of the amount of peat-based habitat available for restoration in the PfE area.**

2. The supplementary information has identified that the site lies within the mossland and lowland farmland landscape character type, but has failed to identify that the allocation site falls within the Great Manchester Wetlands Nature Improvement Area (NIA), which is a GI opportunity area and the commitments within Policy JP-G 2 to deliver or contribute to green infrastructure improvements.

3. Given the close proximity of Astley Moss SSSI/Manchester Mosses SAC, the Trust welcomes the commitment to a project-specific Habitats Regulations Assessment.

4. Desktop searches and incidental site visits indicate that the area supports significant biodiversity interest, including four protected species within the proposed land allocation with an additional seven protected species with 1km of the site. S41 species have also been identified including; Yellowhammer, Linnet, Skylark, Stock Dove, Grey Partridge, Reed Bunting, Lapwing, and Yellow Wagtail. There are also records for breeding Willow Tit.

5. The GMEU report indicates that the majority of the priority species within the site are adapted to farmland landscapes, with others being adapted to the remnant mossland and wetland habitats associated with ditches. The report further highlights the importance of Yellow Wagtail, which is a rare breeder in Greater Manchester, with a stronghold on Chat Moss and a significant percentage of that Chat Moss population on Barton Moss. The Trust agrees with the assessment that any development would result in negative impacts that should be compensated. The Trust therefore welcomes and supports policy 14 that states the allocation needs to be supported by breeding and winter bird surveys to understand and minimise any adverse impact on bird species in this area. Surveys of potential compensation areas should also be undertaken to demonstrate that displacement into the wider landscape is possible. We would add that any compensation area identifies must be managed and maintained under an appropriate long-term management plan.

6. The GMEU report further states that "*separate but potentially overlapping with off-set mitigation would be mitigation for loss of habitat for farmland birds and highlights the requirements that surveys identify if the land onto which they are displaced are at the carrying capacity for the species, as this would lead to a reduction in the population of these species*". The Trust agrees with this statement and supports the requirement to undertake surveys beyond the site allocation to fully assess their potential for mitigation and/or compensation.

7. The Trust welcomes policy clause 12, which seeks to achieve a minimum 10% net gain in biodiversity and mitigate the environmental impacts of development. We would reference the ecological appraisal report that highlights that any habitat that is on deep peat will be identified as wetland and the BNG metrics need to be calculated accordingly.

8. Any retained habitat - such as the ponds, hedgerows and woodlands - or newly created landscaped areas would need to be designed to maintain ecological links and networks that also connect with the wider ecological networks. We therefore welcome policy clause 15 that seeks to protect and enhance surrounding habitats, including the *Foxhill Glen* Site of Biological Importance (SBI).

9. The Trust notes that policy clause 13 supports the objectives for the Great Manchester Wetlands Nature Improvement Area and avoidance of harm to protected species. The presumed intent of the requirement is welcome; particularly, of course, since Cheshire Wildlife Trust and The Wildlife Trust for Lancashire Manchester & North Merseyside itself have high degrees of commitment to the mosslands area of the Great

Manchester Wetlands Nature Improvement Area as a whole. The Trusts would point out that these objectives include the protection and enhancement areas supporting wading birds such as those identified within the development area.

10. The supplementary information supplied indicates that peat soils may be present in the central and northern areas of the site, with a typical thickness of 2m. Development on these peat soils would be contrary to Defra's recently published England Peat Plan and the draft policies within the Places for Everyone consultation.

    The Defra England Peat Action plan states that all uses of peatland should keep the peat wet and in the ground. The action plan highlights that peatlands are susceptible to development pressures; and it is vital that planning policies reflect the importance of peatlands for climate, water and biodiversity. Biodiversity net gain metric recognises the ecological value of peat - with high or very high distinctiveness and as non-replaceable habitat. This means that there is a strong incentive for development to retain peatland habitats and to avoid damage to them in the first place (in line with the mitigation hierarchy). Any unavoidable losses or damage to non-irreplaceable habitat would need to be compensated for, ideally on site or locally. It is the Trust's view that all identified areas of peat should remain undeveloped and mitigation/compensation for the development should be on site.

    The restorable potential of the peat soils has not yet been investigated. The peat plan seeks to protect peatlands, including those which are damaged but recoverable, from potentially damaging development that would hinder restoration and recovery of the habitats and species. The England Peat Action Plan will also consider how we can strengthen the protection afforded to peatlands in national planning policy, guided by the development of new tools such as the new England Peat Map and the Natural Capital Ecosystem Assessment Pilot.

11. If, as in another proposed area allocation on peat (New Carrrington), the technique for development on peat soils is to mix the peat with concrete as a binder, this would continue to release carbon.

TAMESIDE

Policy JP Allocation 30 Ashton Moss West

CWT recommends the development of the Ashton Moss Allocation is **unsound** for the following reasons:

1. Allocation of this site conflicts with PfE Policy JP-G 2 and NPPF Para 175 as part of the site sits within the PfE Green Infrastructure network.

2. Securing a measurable biodiversity net gain of 10% for this site, in line with PfE Policy JP-G 9 and NPPF Paragraphs 174d and 179b, may not be possible due to the current high value of the site. This is particularly relevant if OMH is identified at the site.

3. The Ashton Moss allocation site sits within an area of deep peaty soils. While the site differs markedly from Carrington Moss, namely due a thick layer of made ground having been deposited on top of the original peat layer, there is still potential for emissions arising as a result of peat extraction due to the significant variations in

thickness of made ground. Should the site be subject to development of the scale proposed in the Ashton Moss Allocation, a significant proportion of the peat would potentially be required to be removed to facilitate construction. As described above, this is often assessed in an Environmental Impact Assessment and referred to as GHG emissions arising as a result of land use change. The exact area and depth of peat that remains at Ashton Moss needs to established as a matter of urgency in order to understand the potential impacts on the climate that its removal may have. If peat extraction is required, and it has not already been factored into the GM Carbon Neutrality targets and budgets (which we suspect it hasn't), it would significantly impact on the ability of Greater Manchester to achieve the goal of becoming carbon neutral by 2038 (Policy JP-S 2). Any assessment of Greater Manchester's path to carbon neutrality that does not take account of the potential requirement for peat extraction at Carrington Moss would be highly inaccurate, disingenuous and undermine the aspiration of the combined authority to become carbon neutral by 2038. Locating the Ashton Moss allocation on deep peat also contradicts NPPF Para 154b.

4. The Ashton Moss Allocation contradicts PfE Policies JP-S 2, JP-G 4 and NPPF Para 161c as it will directly result in a reduction of the amount of peat-based habitat available for restoration in the PfE area. As one of the few lowland peat bodies in the GMCA area, rather than allocate the site for development, Ashton Moss would be a much more suitable location for the delivery of high quality green infrastructure and natural capital solutions to offset the effects of the allocations proposed in the wider PfE area and localised impacts arising as a result of climate change. Ashton Moss is one of a very limited number of undeveloped sites in the PfE area that can deliver alternative multi-functional benefits (as per NPPF Para 120b) and therefore an alternative strategy to the Ashton Moss Allocation must be investigated as a matter of priority.

5. As above, while brownfield land should be prioritised for development, it is only applicable where this would not conflict with other policies in the NPPF (NPPF Para. 119). Although not identified on the Natural England PHI, due to the significant historic industrial uses of the site and it's previously developed status, the majority of the Ashton Moss Allocation could potentially be classified as OMH, a Priority Habitat and HPI under the NERC Act 2006. If following a detailed ecology survey OMH is identified on site, the Ashton Moss allocation site qualifies for consideration for SBI designation under the Ur1 Urban Habitats category. Therefore, all areas of the site that incorporate OMH must be excluded from the allocation to comply with PfE policies and the NPPF (policies highlighted above).

6. Other examples of potential priority habitats including hedgerows and ponds are also located within the Ashton Moss allocation. The mitigation hierarchy should be applied to comply with Policy JP-G 9 and national planning policies (highlighted above) and all these areas should be excluded from the allocation in order to avoid harm to biodiversity.

7. There is evidence to suggest that Ashton Moss supports BoCC red listed birds such as curlew, skylark, linnet and lapwing utilise the site. In addition, priority species including wall butterfly, hedgehog, bats and black poplar have also been recorded at the site. Curlew are classed as globally near threatened and are possibly the UK's most important bird conservation priority (https://www.bto.org/science/latest-

research/decline-curlew). In order to comply with the mitigation hierarchy as set out in Policy JP-G 9 and national planning policies (highlighted above), measures will be required to mitigate the impacts on these important species.

Policy JP Allocation 31 Godley Green Garden Village

CWT recommends the development of the Godley Green Garden Village Allocation is **unsound** for the following reasons:

1. The site incorporates two SBI's: Brookfold Wood and Werneth Brook. Both of these sites must be excluded from the allocation to comply with PfE policies JP-G 2 and JP-G 9 and NPPF (2021) Paragraphs 174a, 174d, 175, 179a, 179b and 180a.

2. The site includes an area of ancient woodland; Brookfold Wood which is also a SBI. Ancient woodland is an irreplaceable habitat as per the NPPF para. 180c, and development of the scale proposed at Godley Green Garden Village could result in significant loss and deterioration of an irreplaceable habitat while also contradicting PfE policy JP-G 7.

3. The site is within 10 km of the South Pennine Moors Special Area of Conservation and Special Protection Area (European protected sites). Development of the scale proposed at Godley Green Garden Village could potentially affect these sites as the proposed end-use is large-scale residential use. This could lead to significant increases in recreational pressures on the SAC/SPA and lead to degradation in the condition of the sites and their designated features. Increased recreational pressure may also affect nearby sites including Werneth Low Local Nature Reserve (LNR) and Werneth low Country Park SBI. If not mitigated for, this additional recreational pressure would contradict PfE policies JP-G 2, JP-G 5, JP-G 7 and JP-G 9 and national planning policies (highlighted above).

4. The site supports a known population of Great Crested Newt; a species protected in the UK under the Wildlife and Countryside Act (1981) as amended, a European Protected Species under Annex IV of the European Habitats Directive a priority and a UK BAP Priority Species and SPI under the NERC Act 2006. This population could potentially be significantly impacted by the proposed allocation thereby contradicting NPPF Para 179b.

5. Allocation of this site conflicts with PfE Policy JP-G 2 and NPPF Para 175 as part of the site sits within the PfE Green Infrastructure network.

6. Securing a measurable biodiversity net gain of 10% for this site, in line with PfE Policy JP-G 9 and NPPF Paragraphs 174d and 179b, may not be possible due to the current high value of the site.

7. Other examples of actual and potential priority habitats including lowland meadow, an extensive hedgerow network, Werneth Brook and small woodlands are also located within the Godley Green Garden Village allocation. The mitigation hierarchy should be applied to comply with Policy JP-G 9 and national planning policies (highlighted above) and all these areas should be excluded from the allocation in order to avoid harm to biodiversity.

8. The Godley Green Garden Village allocation site may potentially be important for the populations of breeding birds it supports including BoCC red listed birds such as yellow wagtail and spotted flycatcher. In addition, priority species including European brown hare have been recorded. In order to comply with the mitigation hierarchy as set out in Policy JP-G 9 and national planning policies (highlighted above), measures will be required to avoid and mitigate the impacts on these important species.

9. The Town and Country Planning Association (an independent UK charity founded in 1899) has produced a suite of guidance documents on planning for, designing, and delivering new garden communities at a range of scales known as 'Garden City Standards for the 21st Century: Practical Guides for Creating Successful New Communities[14]'. Guide 7, 'Planning for Green and Prosperous Places (2017)', includes principles specifically relating to green infrastructure in garden village design, and Principle 7 within this guide states that "New developments should increase biodiversity. Existing designated sites and irreplaceable habitats of international, national and local significance should be protected from development – and enhanced if they are in a poor condition. In addition, habitats and features should be created, restored, connected and managed for biodiversity to create a 'net gain' in biodiversity after the development has been completed". In light of the proposed impacts to the SBI's, the proposals for this principle has not been adhered to in the development of the Godley Green Garden Village and therefore this allocation contradicts NPPF Para 73c.

Policy JP Allocation 32 South of Hyde

CWT recommends the development of the South of Hyde Allocation is **unsound** for the following reasons:

1. The site incorporates the Pole Bank (North) SBI. This site must be excluded from the allocation to comply with PfE policies JP-G 2 and JP-G 9 and NPPF (2021) Paragraphs 174a, 174d, 175, 179a, 179b and 180a.

2. The site includes an area of ancient woodland; Pole Bank (North) which is also a SBI. Ancient woodland is an irreplaceable habitat as per the NPPF para. 180c, and development of the scale proposed at the South of Hyde allocation could result in significant loss and deterioration of an irreplaceable habitat while also contradicting PfE policy JP-G 7.

3. Allocation of this site conflicts with PfE Policy JP-G 2 and NPPF Para 175 as part of the site sits within the PfE Green Infrastructure network.

4. Other examples of potential priority habitats including species rich and marshy grasslands, hedgerows and semi-natural woodland are also located within the South of Hyde allocation. The mitigation hierarchy should be applied to comply with Policy JP-G 9 and national planning policies (highlighted above) and all these areas should be excluded from the allocation in order to avoid harm to biodiversity.

[14] https://www.tcpa.org.uk/guidance-for-delivering-new-garden-cities

5. There is evidence to suggest the South of Hyde allocation is utilised by BoCC red listed birds such as curlew and priority species including small heath butterfly and black poplar which have all been recorded at the site in the past. There are also habitats on site suitable for badger and water vole. Curlew are classed as globally near threatened and are possibly the UK's most important bird conservation priority (https://www.bto.org/science/latest-research/decline-curlew). In order to comply with the mitigation hierarchy as set out in Policy JP-G 9 and national planning policies (highlighted above), measures will be required to avoid and mitigate the impacts on these important species.

TRAFFORD

Policy JP Allocation 33 New Carrington

CWT recommends the development of the New Carrington Allocation is **unsound** for the following reasons:

1. The site incorporates eight SBI's: Altrincham Sewage Works, Birchmoss Covert, Broadoak Wood, Carrington Power Station, Coroners Wood, Partington Nature Reserve, Sinderland Green Wood and Wetland at Carrington Moss. All of these sites must be excluded from the allocation to comply with PfE policies JP-G 2 and JP-G 9 and NPPF (2021) Paragraphs 174a, 174d, 175, 179a, 179b and 180a.

2. The site is immediately adjacent two areas of ancient woodland; Brookheys Covert which is also a Site of Special Scientific Interest (SSSI) and Coroners Wood. Ancient woodland is an irreplaceable habitat as per the NPPF para. 180c, and development of the scale proposed at New Carrington could result in significant deterioration of an irreplaceable habitat at both locations while also contradicting PfE policy JP-G 7. This would also contradict NPPF para. 180b as the deterioration of ancient woodland would likely have a significant effect on the status of the Brookheys Covert SSSI.

3. Allocation of this site conflicts with PfE Policy JP-G 2 and NPPF Para 175 as part of the site sits within the PfE Green Infrastructure network.

4. Securing a measurable biodiversity net gain of 10% for this site, in line with PfE Policy JP-G 9 and NPPF Paragraphs 174d and 179b, may not be possible due to the current high value of the site, particularly depending on the extent of the remaining peat deposits.

5. The allocation site sits within approximately 400 ha of deep peaty soils. Contrary to the description in the New Carrington masterplan (pg. 36) Carrington Moss is not a former peat bog. Although largely degraded to agriculture, there are areas that support actively growing peat forming vegetation and it is highly likely that substantial areas of the peat body associated with the relict lowland raised bog of Carrington Moss still exists. Should the site be subject to development of the scale proposed in the New Carrington Allocation, a significant proportion of the peat would potentially be required to be removed to facilitate construction. This is often assessed in an Environmental Impact Assessment, within the climate section, and referred to as GHG emissions arising as a result of land use change. In the case of peat soils, GHG emissions (both during construction and operation) are often a significant factor when determining the impact of land use change on the climate. The exact area and depth

of peat that remains at Carrington Moss needs to established as a matter of urgency in order to understand the potential impacts on the climate that its removal may have. If peat extraction is required, and it has not already been factored into the GM Carbon Neutrality targets and budgets (which we suspect it hasn't), it would significantly impact on the ability of Greater Manchester to achieve the goal of becoming carbon neutral by 2038 (Policy JP-S 2). Any assessment of Greater Manchester's path to carbon neutrality that does not take account of the potential requirement for peat extraction at Carrington Moss would be highly inaccurate, disingenuous and undermine the aspiration of the combined authority to become carbon neutral by 2038. Locating the New Carrington allocation on deep peat also contradicts NPPF Para 154b.

6. The New Carrington Allocation contradicts PfE Policies JP-S 2, JP-G 4 and NPPF Para 161c as it will directly result in a reduction of the amount of peat-based habitat available for restoration in the PfE area. As one of the larger lowland peat bodies in the GMCA area, rather than allocate the site for development, Carrington Moss would be a much more suitable location for the delivery of high quality green infrastructure and natural capital solutions to offset the effects of the allocations proposed in the wider PfE area and localised impacts arising as a result of climate change. Carrington Moss is one of a very limited number of undeveloped sites in the PfE area that can deliver alternative multi-functional benefits (as per NPPF Para 120b) and therefore an alternative strategy to the New Carrington Allocation must be investigated as a matter of priority.

7. While the NPPF is explicit that previously developed land, treated as synonymous with brownfield, should be prioritised for development, it is only applicable to brownfield sites where this would not conflict with other policies in the NPPF, including causing harm to designated sites of importance for biodiversity (NPPF Para. 119). A significant proportion of the New Carrington Allocation, associated with the brownfield land at the former Shell industrial site has been identified on the Natural England Priority Habitat Inventory as Open Mosaic Habitat on Previously Developed Land (OMH), a Priority Habitat and Habitat of Principal Importance for Conservation in England (HPI) under the NERC Act 2006. According to the Greater Manchester SBI Selection Guidelines, this area of the New Carrington allocation qualifies for consideration for SBI designation under the Ur1 Urban Habitats category: "Any site that supports the UK Biodiversity Priority Habitat Open Mosaic Habitat on Previous Developed Land." Therefore, all areas of the site that incorporate OMH must be excluded from the allocation to comply with PfE policies and the NPPF (policies highlighted above).

8. Other examples of potential priority habitats including small woodlands and riparian habitat are also located within the New Carrington allocation. The mitigation hierarchy should be applied to comply with Policy JP-G 9 and national planning policies (highlighted above) and all these areas should be excluded from the allocation in order to avoid harm to biodiversity.

9. Carrington Moss is particularly important for the populations of breeding and wintering birds it supports including BoCC red listed birds such as yellow wagtail, spotted flycatcher, corn bunting, curlew, lapwing, willow tit and priority species including European brown hare, water vole and reptiles have all been recorded at the site in the past. Curlew are classed as globally near threatened and are possibly the

UK's most important bird conservation priority (https://www.bto.org/science/latest-research/decline-curlew). In order to comply with the mitigation hierarchy as set out in Policy JP-G 9 and national planning policies (highlighted above), measures will be required to avoid and mitigate the impacts on these important species.

WIGAN

JPA 34: M6 Junction 25.

The Wildlife Trust for Lancashire, Manchester & North Merseyside recommends that the development of this allocation be considered to be **unsound** for the following reasons

1. **This allocation policy fails to mention that the allocation is within the Great Manchester Wetlands Nature Improvement Area (NIA).** The NIA is identified in JP-G 2 as a Green Infrastructure Opportunity Area and that policy states
2. "*Where Green Infrastructure Opportunity Areas overlap or are in close proximity to development allocations proposed in this plan appropriate measures to achieve this* [meaning development within and around the Green Infrastructure Network] *should be consistent with delivering major green infrastructure improvements within them and should contribute to improvements) have been included*".
3. The landscape and habitat management plan must show how the ecological connections between retained habitat and newly created habitat are to be ensured and how this would connect to the wider ecological networks.
4. The Trust notes that this site allocation has already received planning permission and that the new site boundary includes retained Green Belt between the development and housing to the north. We also note that as part of the planning process it was demonstrated that the site has value for its existing woodland, hedgerow ponds and semi-improved and marshy grassland habitats. It is acknowledged within the topics paper that the development will result in the loss of many of its on-site natural habitats. The Trust notes the conditions to the planning approval that a detailed landscape and habitat creation and management plan will be produced as part of future development of the site and that the plan requires the development to achieve at least a 10% BNG. The Trust also notes that off-site compensation is to be provided through the generation of funds for the Wigan Wetlands Project at Wigan Flashes and Three Sisters Local Nature Reserve.

JPA 35: North of Mosley Common

The Wildlife Trust for Lancashire, Manchester & North Merseyside recommends that the development of this allocation be considered to be **unsound** for the following reasons:

1. **This allocation policy fails to mention that the allocation is within the Great Manchester Wetlands Nature Improvement Area (NIA).** The NIA is identified in JP-G 2 as a Green Infrastructure Opportunity Area and the policy states
2. "*Where Green Infrastructure Opportunity Areas overlap or are in close proximity to development allocations proposed in this plan appropriate measures to achieve this* [meaning development within and around the Green Infrastructure Network] *should be consistent with delivering major green infrastructure improvements within them and should contribute to improvements) have been included*".
3. **This allocation policy conflicts with the England Peat Action Plan, Places for People Policy JP-S 2 Carbon and Energy, para 6; Policy JP-G 4 Lowland Wetlands and Mosslands, para 2**

and NPPF Para 161c as it will directly result in a reduction of the amount of peat-based habitat available for restoration in the PfE area.

4. Allocation of this site also conflicts with PfE Policy JP-G 2 and NPPF Para 175 as part of the site sits within the GMSF Green Infrastructure network.
5. Securing a measurable biodiversity net gain of 10% for this site, in line with PfE Policy JP-G 9 and NPPF Paragraphs 174d and 179b, may not be possible due to the current high value of the site, particularly depending on the extent of the remaining peat deposits.
6. The allocation site sits within deep peaty soils. Although largely degraded to agriculture, it is likely that substantial areas of the peat body associated with the relict lowland raised bog still exist. Should the site be subject to development of the scale proposed a significant proportion of the peat would potentially be required to be disturbed or removed to facilitate construction. This is often assessed in an Environmental Impact Assessment, within the climate section, and referred to as greenhouse gas (GHG) emissions arising as a result of land use change. In the case of peat soils, GHG emissions (both during construction and operation) are often a significant factor when determining the impact of land use change on the climate.
7. If peat extraction and/or disturbance is required, and it has not already been factored into the GM Carbon Neutrality targets and budgets (which we suspect it hasn't), it would significantly impact on the ability of Greater Manchester to achieve the goal of becoming carbon neutral by 2038 (Policy JP-S 2). Any assessment of Greater Manchester's path to carbon neutrality that does not take account of the potential impact on peat sequestration and storage at this allocation would undermine the aspiration of the combined authority to become carbon neutral by 2038. Locating this allocation on deep peat also contradicts NPPF Para 154b.
8. The allocation contradicts PfE Policies JP-S 2, JP-G 4 and NPPF Para 161c as it will directly result in a reduction of the amount of peat-based habitat available for restoration in the PfE area. As part of the largest lowland peat body in the GMCA area, rather than allocate all of the site for development, this area would be a much more suitable location for the delivery of high-quality green infrastructure and natural capital solutions to offset the effects of the allocations proposed in the wider PfE area and localised impacts arising as a result of climate change, as well as keeping carbon in the ground and providing resilience to the effects of climate change. It is one of a very limited number of undeveloped sites in the PfE area that can deliver alternative multi-functional benefits (as per NPPF Para 120b) and therefore an alternative strategy to this allocation should be investigated as a matter of priority.
9. The Trust disagrees with the Ecological Assessment that the species-poor semi-improved grassland and arable fields are of low ecological value. The fields may be low in botanical value but an assessment of any priority species that are utilising these fields is yet to be made. If the low ecological value refers to the biodiversity net gain metric, this again only relates to the habitat not to any species that may be dependent on it.
10. The ecological report identifies a number of higher quality habitat areas within the site, including a network of ponds hedgerows and brooks across the site. Due to the boundary change, an updated and full assessment of habitats and species contained within the development area will need to be provided. The current mitigations and compensations outlined in the report may also be out of date.
11. The allocation site lies between two SBI's designated for their pond habitats and their amphibian interest including the protected Great Crested Newt. Existing habitats such as the parcels of woodland and the hedgerows, the existing ditches, streams and ponds will need to be retained and enhanced, as will the ecological linkages between the existing and any

newly created habitat and the two SBI's. The whole area is important for Great Crested Newt and terrestrial habitat and breeding areas for the local meta-population of this species need to be protected and maintained. Any development must deliver the sustained enhancement of the adjacent Local Wildlife Sites (*Ponds North of Cleworth Hall* SBI and *Ponds near New Manchester (West)* SBI's.

12. Even with the reduced allocation area, there will still be a significant loss of grassland habitat. The ecological report acknowledges that this would result in a reduction in habitat for Barn Owl and Brown Hare, identified as being in the area. The report indicates that these losses can be compensated for by the creation of new habitat of value to birds such as new ponds, wetlands and species rich grasslands and woodland. However, this must be specific to the species adversely affected by the development proposal. No specific bird survey has been undertaken by the developer. There are records of S41 birds on the site and within 1km of the site. The Trust has anecdotal evidence from an informed member of the public that suggests the presence of annually nesting Lapwing, an assemblage of farmland birds and foraging bats. Oystercatcher have been observed overflying the fields: Redshank are known to breed in the area.
13. Any mitigation and enhancement plan must show how these S41 bird species are to benefit from the development of the site and how they can be mitigated or compensated for within the development area. If these species cannot be adequately mitigated on site, then off-site compensation must be provided. Suitable compensation areas need to be identified and managed to enhance the populations of the S41 species. The mechanism of how this off-site compensation is delivered needs to be identified and clearly set out. This approach will also benefit other fauna identified in the report such as Brown Hare and Barn Owl.
14. The Trust manages part of the Ponds North of Cutacre SBI. We are concerned that the building of so many adjacent residential houses will increase visitor pressure on the reserve. The reserve already suffers from dogs that are off-lead and disturbances to the wildlife reserve. This pressure is likely to increase due to the development. The development must therefore ensure sufficient open space and recreation areas within the development area to reduce this user pressure and/or mitigate the increased pressures on the SBI's through appropriate visitor management.
15. The Trust notes and welcomes the commitment within policy 1 that the masterplan is effectively informed by detailed site investigations such as the presence of priority habitats and other constraints. These constraints need to include any survey data on farmland birds as noted above.
16. The Trust welcomes the commitments within Policy 9; to "*Protect and enhance the environs of Honksford Brook through the creation of a green infrastructure corridor, including safeguarding land for a flood storage area to mitigate the risk of flooding downstream".* These corridors should perform the function outlined above of ensuring the two SBI's remain connected to each other and other wetland/terrestrial amphibian habitats.

JPA 36: Pocket Nook

The Wildlife Trust for Lancashire, Manchester & North Merseyside recommends that the development of this allocation be considered to be **unsound** for the following reasons:

1. **This allocation policy fails to mention that the allocation is within the Great Manchester Wetlands Nature Improvement Area (NIA).** The NIA is identified in JP-G 2 as a Green Infrastructure Opportunity Area and the policy states:

"*Where Green Infrastructure Opportunity Areas overlap or are in close proximity to development allocations proposed in this plan appropriate measures to achieve this* [meaning development within and around the Green Infrastructure Network] *should be consistent with delivering major green infrastructure improvements within them and should contribute to improvements) have been included*".

2. The Trust notes that a historic impact assessment has been provided as part of the supplementary information, but no ecology appraisal nor ecological impact assessment (not even in its simplest form) has been provided. Without this assessment, it is not possible to assess any ecological constraints or adverse impacts of the development and that this is contrary to NPPF's test for soundness. Full and detailed ecology surveys that assess the sites habitat and species importance must be provided.

3. The supplementary information has identified that the site lies within the mossland and lowland farmland landscape character type, but has failed to identify that the allocation site falls within the Great Manchester Wetlands Nature Improvement Area (NIA), which is a GI opportunity area and the commitments within Policy JP-G 2 to deliver or contribute to green infrastructure improvements.

4. It is noted that the Environment Agency has advised that this is a river valley which should be regarded as a priority green infrastructure asset and, as such, the habitat corridor should be protected and enhanced to improve the existing water quality. We also note Policy 7: to protect and enhance the environs of Carr Brook through the creation of a green infrastructure corridor. Whilst the Trust welcome this, the commitment to GI should go beyond this.

5. An ecological appraisal of the site and an ecological master plan need to be provided to illustrate where features are to be retained/enhanced and how these connect with each other and the wider ecological network. It is noted that within the Green Infrastructure section of the topics paper there is a commitment to retain hedgerows, but there is no reference to this within the section on ecology and biodiversity. The positive contribution of retaining/enhancing GI on biodiversity needs to be shown and detailed. This is especially important, as the sites location; adjacent to other developments, increases and compounds the issues of fragmentation and disconnection of S41 habitats and species of principle importance. Policy JP G-9 clause 3 stresses the need to avoid fragmentation or severing connectivity and stresses the importance of providing this connectivity.

6. There is a commitment to securing a 10% BNG through the creation, protection and enhancement of GI within the site, but again this is not shown in the biodiversity section. How this 10% increase is achieved will need to be set out clearly.

7. At the very least a baseline assessment of the current biodiversity interest needs to be shown. For instance, Natural England's Magic Map indicates that the area might be important for a range of S41 birds such as Curlew, Lapwing, Redshank, Corn Bunting and Grey Partridge. The area is also identified for its arable and grassland assemblages of birds. These species may or may not be present, within the site boundary, but a baseline survey for farmland birds is obviously key to ensuring their protection. If it is shown that the development is to have an adverse effect on these species appropriate mitigation and compensation needs to be identified. If compensation within the development is not possible, off-site compensation needs to be provided. The mechanism of how this off-site compensation is delivered needs to be identified and clearly set out.

JPA 37: West of Gibfield

The Wildlife Trust for Lancashire, Manchester & North Merseyside recommends that the development of this allocation be considered to be **unsound** for the following reasons:

1. **This allocation policy fails to mention that the allocation is within the Great Manchester Wetlands Nature Improvement Area (NIA).** The NIA is identified in JP-G 2 as a Green Infrastructure Opportunity Area and the policy states

"*Where Green Infrastructure Opportunity Areas overlap or are in close proximity to development allocations proposed in this plan appropriate measures to achieve this* [meaning development within and around the Green Infrastructure Network] *should be consistent with delivering major green infrastructure improvements within them and should contribute to improvements) have been included*".

2. **Given that the proposed allocation includes a significant proportion of Grade A SBI, we have grave doubts as to how practicable it will be to deliver and maintain adequate mitigation solely on site: additional offsite mitigation/compensation would seem likely to be required if net biodiversity gain is to be delivered and sustained. Otherwise these sites must be excluded from the allocation to comply with PfE policies JP-G 2 and JP-G 9 and NPPF (2021) Paragraphs 174a, 174d, 175, 179a, 179b and 180a.**
3. **This allocation policy conflicts with the England Peat Action Plan, Places for People Policy JP-S 2 Carbon and Energy, para 6; Policy JP-G 4 Lowland Wetlands and Mosslands, para 2 and NPPF Para 161c as it will directly result in a reduction of the amount of peat-based habitat available for restoration in the PfE area.**
4. **Allocation of this site also conflicts with PfE Policy JP-G 2 and NPPF Para 175 as part of the site sits within the GMSF Green Infrastructure network.**
5. Securing a measurable biodiversity net gain of 10% for this site, in line with PfE Policy JP-G 9 and NPPF Paragraphs 174d and 179b, may not be possible depending on the extent of the remaining peat deposits.
6. The allocation site includes deep peaty soils. Although largely degraded to agriculture, it is likely that substantial areas of the peat body associated with the relict lowland raised bog still exist. Should the site be subject to development of the scale proposed a significant proportion of the peat would potentially be required to be disturbed or removed to facilitate construction. This is often assessed in an Environmental Impact Assessment, within the climate section, and referred to as greenhouse gas (GHG) emissions arising as a result of land use change. In the case of peat soils, GHG emissions (both during construction and operation) are often a significant factor when determining the impact of land use change on the climate.
7. If peat extraction and/or disturbance is required, and it has not already been factored into the GM Carbon Neutrality targets and budgets (which we suspect it hasn't), it would significantly impact on the ability of Greater Manchester to achieve the goal of becoming carbon neutral by 2038 (Policy JP-S 2). Any assessment of Greater Manchester's path to carbon neutrality that does not take account of the potential impact on peat sequestration and storage at this allocation would undermine the aspiration of the combined authority to become carbon neutral by 2038. Locating this allocation on deep peat also contradicts NPPF Para 154b.
8. The allocation contradicts PfE Policies JP-S 2, JP-G 4 and NPPF Para 161c as it will directly result in a reduction of the amount of peat-based habitat available for restoration in the PfE

area. As part of the largest lowland peat body in the GMCA area, rather than allocate all of the site for development, this area would be a much more suitable location for the delivery of high-quality green infrastructure and natural capital solutions to offset the effects of the allocations proposed in the wider PfE area and localised impacts arising as a result of climate change, as well as keeping carbon in the ground and providing resilience to the effects of climate change. It is one of a very limited number of undeveloped sites in the PfE area that can deliver alternative multi-functional benefits (as per NPPF Para 120b) and therefore an alternative strategy to this allocation should be investigated as a matter of priority.

9. It is noted that the supplementary information provided indicates that the grasslands which have been identified as low constraint to the development, actually supports a range of farmland birds listed as birds of conservation concern. These section 41 birds include; Skylark, Reed Bunting and Yellowhammer, with records of Linnet, Sedge Warbler and Little Owl, as well as the S41 species the Brown Hare identified within the reports provided. The Trust welcomes the commitment to undertake appropriate and detailed species surveys, we note that these are not outlined in any specific allocation policy. This needs to be rectified.

10. The ecological report indicates that the development will cause the direct loss of grassland habitat that will result in the reduction in range for farmland bird species barn owl and brown hares (Section 41 species), along with a reduction in foraging habitat for badger. The Trust would add that this would also impact on many of the other S41 species identified above, especially Skylark, which prefer large open and undisturbed grasslands. The ecological report agrees with this as it states that the creation of new habitat will be capable of supporting populations of S41 birds, albeit not the same species that would be displaced from the farmed area. The Trust believes this to be unacceptable. S41 species can be considered as a material consideration in planning development and their loss without mitigation/compensation could merit refusal of the planning application. Any mitigation and enhancement plan provided must show how the S41 bird species that are adversely affected can be mitigated or compensated for within the development area. If these species cannot be adequately mitigated on site, then off-site mitigation must be provided. Suitable compensation areas need to be identified and managed to enhance the populations of the S41 species. This approach will also benefit other fauna identified in the report such as Brown Hare and Barn Owl.

11. Our previous comments highlighted that the development would sever the only remaining north-south corridor through the Greater Manchester/Liverpool City Region conurbation that is available for habitats and species of principal importance in England that are dependent on lowland agricultural management; most notably Brown Hare. The illustrated master plan provided within the supplementary information shows that this corridor will still be severely restricted and blocked along the southern edge of the site.

12. Development of this site will likely result in significant loss of green infrastructure, including substantial areas of the Gibfield Park (North) and Gibfield Park (South) SBI's and many of the existing ecological networks; in particular resulting in a restricted, locally significant ecological network corridor from east to west through the conurbation, and the loss of a nationally significant ecological network corridor running south to north through the Greater Manchester/Liverpool City Region urban barrier between the Irish Sea and Cambrian Mountains to the west and the Pennines to the east.

13. The only other substantive corridor is already allocated for development in the St Helens Local Plan in adjacent Liverpool City Region. The Trust therefore supports the ecological

report's suggestion that wildlife corridors, such as the numerous ditches and hedgerows, should be retained and protected by habitat buffers.

14. The Trust notes and supports the proposal to integrate new and existing green infrastructure into new development and to provide for the long-term management and maintenance. However, we note that a lot of the GI provision within the proposal is to benefit access and recreation. It is vital for nature conservation interest that sufficient areas of quite secluded habitat are provided and managed as part of the long-term ecological management plan. The development must ensure there is sufficient provision and width of corridor that will allow it to function and allow the free movement of the ecological features including those S41 species identified.

15. Based on the above, we therefore propose some further policy requirements:

'**Protect and enhance the Gibfield Park (North) and Gibfield Park (South) SBIs, including maintenance, enhancement and restoration of connectivity and terrestrial habitat for amphibians and other biodiversity assets identified**.'

'**The management of the proposed country park to include the provision of good quality semi-natural habitats, together with guaranteed on-going management to maintain and enhance the park's value for locally characteristic wild species and habitats**.'

16. However, given that the proposed allocation includes a significant proportion of Grade A SBI, we have grave doubts as to how practicable it will be to deliver and maintain adequate mitigation solely on site: additional offsite mitigation/compensation would seem likely to be required if net biodiversity gain is to be delivered and sustained. Otherwise these sites must be excluded from the allocation to comply with PfE policies JP-G 2 and JP-G 9 and NPPF (2021) Paragraphs 174a, 174d, 175, 179a, 179b and 180a.

17. Notwithstanding the reservations above, we welcome the intent of the policy requirements that:

"*the development of the area will*

"7. Provide a high quality, landscaped corridor along Gibfield Park Way, through the planting of street trees and other strategic landscaping;

"8. Provide a substantive accessible green infrastructure corridor and country park on land remaining in the Green Belt within the allocation, and ensure ongoing arrangement for its maintenance, agreed with the Council;

"9. Make appropriate provision for great crested newts sufficient to mitigate the development".

18. The Trust notes and supports the requirement under 11:350 in the supplementary text that,

"*The green infrastructure requirement will need to be delivered in advance and alongside the housing development and should provide effectively for a country park with wildlife habitats and recreational space*."

Closing Comment

Cheshire Wildlife Trust and The Wildlife Trust for Lancashire, Manchester & North Merseyside would be happy to meet and discuss or expand on any of the above points or recommended changes above in detail with the Greater Manchester Combined Authority, should any representative wish to do so.

We trust you will find all of these comments helpful.

Yours sincerely,

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