

**Baldingstone Housing and Employment Allocation – Greenbelt removal –OBJECTION V5 1/4 pages**

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**Representing – nature conservation and landscape**

This submission should be read whilst looking at my annotated map included.

1 This site was Greenbelt from the earliest draft of the Greater Manchester Greenbelt Subject Plan in 1981 (discarded maps I hold at home as I worked at GMC in the Open Land Group at that time).

2 In the Unitary Development Plan (UDP) it is Greenbelt. Google Earth shows the site as farmed grassland with trees, hedges/walls, shrubland and stock animals. The field with the mast has ridge and furrow grassland. In the centre of the south east of the site is the hamlet of Baldingstone with its village pub.

3 Walmersley Brook and the linear woodland are actually part of the true Wildlife Corridor network between Carr Bank and the Motorway. At the time of the UDP Inquiry I identified this as Wildlife Corridor but this was rejected by the incompetent ecologist who Bury MBC hired to refine the corridor network following my objections.

4 The GMSF proposal is to place all of the land irrespective of its value as a wildlife corridor in either employment or housing allocations. Then we look at the boundary between employment and housing land and the Council's plan is to strand the hamlet centre in an industrial estate. This is highly inappropriate. The placing of the land between Walmersley Old Road and Bentley Lane in employment land is inappropriate and will bring blight to Baldingstone.

5 This objection looks at protecting the wildlife corridors (extant and proposed) and placing the employment – housing boundary in a more appropriate position.

6 The boundary between the two allocations should perhaps be Walmersley Old Road. However the linear woodland alongside Walmersley Brook actually looks a more appropriate boundary between employment and residential uses.

7 The Mill Reservoir and its inflow area should be shifted into the Greenbelt and Wildlife Corridor to help protect its long term future.

8 It is not appropriate to shift the shrubby strip along the inflow stream to the Mill Reservoir out of the Greenbelt. This greenery is at a strategic location in the Wildlife Corridor Network as this, and the adjacent bridleway motorway underpass, are vital for connecting this area with the wider countryside across the motorway.

9 It is not appropriate to place any part of the M66 Motorway embankment in an employment zone. This fringe of habitat is vital for dispersing wildlife using the Wildlife Corridor along the west of the Motorway. The embankment and Motorway verges should be retained within the Greenbelt from the north to the south if the allocation. The allow dispersal from north to south and also link the four passageways over and under the motorway in this area. These are the Public Footpath

underpass, Walmersley Old Road overpass, Bentley Lane underpass, Bridleway underpass near Mill Reservoir inflow.

10 There are narrow parts of the wildlife corridor along the motorway and a smoothing of the new allocation boundary should be made to widen these areas. The areas are on the allocation maps where the words "mast" is written and south of the words "Longcroft House," west of the motorway.

11 An air raid shelter is reported to exist in Baldingstone in tall herb or scrub. This and all structures and trees should be checked by a bat consultant. The South Lancashire Bat Group has recorded 3 species of Bat in this area (it has not been intensively searched). These are Common Pipistrelle, Soprano Pipistrelle and Noctule. Bats are protected by UK and EU law and it is vital that their roosting and feeding areas are protected and linked by linear belts of habitat as described in this document. The Noctule and the Soprano Pipistrelle are UK Biodiversity Action Plan Priority Species, i.e. "Species of principal importance for the purpose of conserving biodiversity" covered under section 41 (England) of the NERC Act (2006) and thus they need to be "taken into consideration by a public body when performing any of its functions with a view to conserving biodiversity." For Noctules, which had a 21% decline over 6 years prior to UKBAP listing, the JNCC website shows a requirement to protect mature trees, wetlands, stream sides and other insect rich areas and boosting water quality – developing in the two wetland corridors in this site will not help water quality. For Soprano Pipistrelles, which had a 42% decline prior to UKBAP listing, the JNCC website requires that the needs of the Soprano Pipistrelle are considered in agri-environment, planning, water quality, wetland creation .....policies. The two river corridors here are considered to be the priority habitats for this species. The JNCC urges the creation, expansion and improvement of key habitats including wetland and features such as hedgerows and woodland edges. "Ensure adequate consideration of a landscape approach to the conservation of Soprano Pipistrelle." Alas the employment and housing allocation does quite the opposite.

12 The woodland and stream area should specifically be excluded from the allocation – left as white land and designated part of the Wildlife Corridor.

13 The proposal should include a firm commitment to turn the ruins of the listed building Gin Hall into a residence.

14 Removing vulnerable wildlife areas from development allocations is the only way to stop them being trashed in favour of development. Every time, take wildlife out of the greenbelt and it is trashed to make the land developable.

15 There are Toads breeding in this reservoir. They use the deep waterbodies in these foothills as a metapopulation. They need to breed, disperse and find land habitats. Toads have a measure of protection in the planning system. The Common Toad is listed by the UK Government as a United Kingdom Biodiversity Action Plan Priority Species, given "serious declines." This is now succeeded by the UK Post-2010 Biodiversity Framework (or "Biodiversity 2020") and Priority Species are termed Section 41 species, the "revised delivery method" for Common Toad conservation cited as "planning policies and control" (Gov.uk website). JNCC species Priority Species account also states "WIDER ACTION- PLANNING: This amphibian would benefit from recognition of its habitat and management

needs at the wider landscape scale both aquatic and terrestrial. Taking account of/ or determining its presence during the early stages of local authority development plans, land allocation (particularly `brownfield sites`) and then development schemes.” The measurement relating to wildlife links and corridors as set out here is one way of mitigating the impact on these animals. The proposal should also require that there are no vertical kerbs and street grids or strip drains on this site. These trap and kill amphibians.

16 The Wildlife Corridor should be completed by including the greenspace to the south of the filled reservoir and taking it downstream to the UDP’s Wildlife Corridor.

17 The site supports Hedgehogs – which is listed by the UK Government as a United Kingdom Biodiversity Action Plan Priority Species, given a 20% decline recorded over 4 years prior to listing as a UKBAP species. This is now succeeded by the UK Post-2010 Biodiversity Framework (or “Biodiversity 2020”) and Priority Species are termed Section 41 species. Species “of principal importance for the purpose of conserving biodiversity” covered under section 41 (England) of the NERC Act (2006) and therefore need to be taken into consideration by a public body when performing any of its functions with a view to conserving biodiversity. Concerns cited are traffic density, fragmentation of habitats, need for hibernation sites, need for hedgerows and wide field margins.

18 The site has the following UKBAP Priority Habitats – Streams; Ponds; Hedgerows.

19 The EU Water Framework Directive requires environmental objectives be set for all surface and ground waters to enable them to achieve good status or potential for heavily modified water bodies by a defined date. One objective is to prevent further deterioration which can include changes to flow pattern, width and depth of channel, sediment availability/transport and ecology and biology.

20 Bury planners are reminded that United Utilities water pipelines run through this site.

These amendments to the proposal are show on the attached plan. They are numbered thus:

- 1 Preferred limit of employment zone
- 2 Gin Hall, to be shifted to residential and restored via this proposal’s mechanisms.
- 3 Walmersley Brook and linear Woodland to be made Wildlife Corridor and white land.
- 4 Baldingstone House area...preferred residential use.
- 5 North side of Walmersley Old Road....preferred residential use.
- 6 Baldingstone east – preferred residential but with retention and enhancement of underpass and overpass wildlife linkages.
- 7 Motorway verge and embankment retained within Greenbelt.
- 8 Motorway embankment to be retained within greenbelt and NOT used for gardens, or sold to householders.
- 9 Shrubby inflow stream to be retained in Greenbelt as it is not developable and should not be placed within gardens or sold to householders. To be added to Wildlife Corridor.
- 10 Narrow motorway verge to be increased at this point, to benefit wildlife corridor. Retained in Greenbelt. Point south of Longcroft House. Not to be used as gardens or yards.

- 11 Narrow motorway verge to be increased at this point, to benefit wildlife corridor. Retained in Greenbelt. Point north of mast.
  - 12 Reduced "Bevis Green" housing plot, in reality no difference in developable size.
  - 13 Mill Reservoir to be moved to Greenbelt and Wildlife Corridor to secure its long term future.
  - 14 Area to be added to Wildlife Corridor Network.
- Red stars show Motorway overpasses and underpasses

