

Walshaw Allocation (Bury) – Greenbelt removal – OBJECTION V5

David P Bentley Ecological Consultant www.davebentleyecology.co.uk

Representing – nature conservation and landscape

The open land between Bury and Walshaw to be destroyed : 1250 houses

1 The wrongly assessed Housing and Employment Need

1.1 The well-loved countryside around Walshaw, and several other parts of the borough, is about to be destroyed on the whim of the local Labour Party. They claim it is the government's fault. That is not true. Labour controlled Local Authorities hired the population forecasters. Labour chose the Accelerated growth option when they could have chosen a lower growth option. Labour decided to ignore the benefits of reduced migration that we will get from leaving the EU. Labour has 90% of the seats on the Greater Manchester Combined Authority and control Bury Council. This hated plan is Labour's work. It is a political project divorced from actual housing and employment needs.

“Option 1 GMFM Baseline 2014: The standard baseline forecasts produced as part of the annual GMFM release in 2014 which draws on OE's national and regional forecasts. This provides a level of growth and development consistent with GM's existing land supply, as identified by the ten local authorities. The baseline is therefore a 'policy neutral' forecast.

Option 2 AGS-SNPP 2014: An Accelerated Growth Scenario providing a projection for the GM economy that is stronger than the baseline forecast, and reflects a future where the city plays a lead role in the development of a 'Northern Powerhouse'. It also meets GM's aspiration to provide additional employment opportunities to non-employed local residents. The scenario adopts demographic assumptions set out in 2012 sub-national population projections (SNPP).”

1.2 The Labour Party chose Option 2. A political decision. In doing so they ALSO chose to ignore the end to the environmentally damaging effects of mass migration that will occur with Brexit. This is specifically cited in the background papers to the GMCA/AGMA Executive Meeting of August 2016.

1.3 This is what the recent past tells us about Bury's population increase since 1981. I did not need to pay population forecasters tens of thousands of pounds. I just checked the census totals for the Borough from 1981 to 2011. Here's what they say and my conclusion:

Bury Pop 1981 175 459. No figs before then as no Bury MBC in 1971.
Bury Pop 1991 179 168. 371 rise in 10 years, 371 in a year average.
Bury Pop 2001 180 608. 1440 rise in 10 years, 144 in a year average.
Bury Pop 2011 185 060. 4452 rise in 10 years, 445 in a year average.

We can maybe put the recent rise down to immigration from the EU, given the rise of numbers of say Polish speakers in the Borough. This will cease on Brexit.

So the worst case scenario is that with a 445 person rise a year for next 20 years 8900 new people will live in Bury. That is assuming Free Movement will continue, which it will not. Assume 2.2 people per home – 4045 homes. I just checked my half of my street – it is 2.3 people per home.

So remain a member of the EU build 4045 homes. Drop to before the Eastern European nations were granted freedom of movement and it is 2880 new people in 20 years. At 2.2 people per home it is 1309 homes. THE GMSF FORECAST OF 12,500 HOUSES IS BEYOND RATIONALITY.

1.4 Something we learned from the EU Referendum and aftermath is that a whole host of economic forecasters were totally wrong – doom was forecast from the moment the UK voted to leave. My opinion is that the Oxford Economics forecast as originally made for new homes, considering the above, is worthless.

1.5 The Greater Manchester Strategic Housing Market Assessment Oct 2016 reports Bury MBC has existing supply of land for 4786 houses and a potential windfall of 1000 houses up to 2035. This is more than the requirement should we remain a member of the EU, and many times more than would be required on leaving.

1.6 Now Bury has been allocated 12,500 houses. The sums of the Greenbelt deletion housing allocations are W 1250, B 60, S 135, H 100, E 3460, N 200 + 1000 + 3400 + 600 = 10,205. Given AGMA and Bury MBC considered it had non Greenbelt sites for 4786 plus 1000 windfall (making 5786) then, with these Greenbelt deletions, Bury will actually have space for 15,991 houses - which is ludicrously over any imagined ludicrous target. Clearly the GMSF has allocated fantasy allocations to Bury. The officers responsible should be dismissed. If this was some planner making a rational decision my comment might be out of order. It is not. This is a case of true incompetence which has caused massive financial cost and widespread emotional upset.

1.7 The buffer the GMCA have applied to elevate Bury's housing target is also unnecessary. Given that the GMSF target is so massively an over calculation there is no need to apply a buffer to allow for flexibility. The likelihood is that people will leave Bury if these plans are approved.

1.8 The figures the GMCA use are based on an expectation of approximately 1.3 persons per dwelling. The 2011 census had a UK average of 2.3 persons per dwelling compared to 2.4 persons per dwelling in 2001. This therefore seems to assume that a lot more people will be living alone and households are getting significantly smaller, far more than the rate in the previous decade for which data is available.

1.9 The mishmash of housing and urban edge the GMSF will create for decades as development proceeds on a slow scale will degrade the town's landscape. It will blur the urban rural edge and lead to chaotic planning, and wholesale wildlife destruction as well.

2 Lack of consultation

2.1 The lack of consultation has been breath-taking. The process is contrary to Bury Council's own guidelines – its Statement of Community Involvement - thus:

“How will the Council involve you?

“The following table lists some of the activities and methods the Council will consider using when undertaking consultation exercises in connection with the Local Plan. The methods used will be tailored to suit the scale and nature of impact of the decisions to be made and the particular needs of people being consulted:” THIS IS THE BIGGEST DEVELOPMENT PLAN THE COUNTY HAS KNOWN.

“Material made available on the Council’s web site, in Council offices at Knowsley Place Reception, Town Hall Reception and selected local libraries (see our Statement of Community Involvement web page on <http://www.bury.gov/10738> for a list).” The ALLOCATIONS MAPS AND TEXT ARE NOT AVAILABLE ON THE COUNCIL WEBSITE. THERE ARE NO DISPLAYS, POSTERS OR LEAFLETS IN ANY COUNCIL RECEPTION IN THE BOROUGH; THE COUNCIL OFFICE IN KNOWSLEY PLACE HAS NOTHING, AND DIRECTS CALLERS TO A 15 MINUTE QUEUE AT THE TOWN HALL. AT THE TIME OF THE UDP THERE WERE PERMANENT DISPLAYS IN 3 TOWN CENTRE LOCATIONS.

“Send letters and emails to database contacts, including targeted consultation letters for key community groups. The Council may consider more targeted consultation where residents may be more directly affected by proposals.” NOT DONE (NOT TO ME!)

“Advertise via social media on Facebook & Twitter.” NOT DONE. I’M HEAVILY INVOLVED ON FACEBOOK AND HAVE SEEN NOTHING FROM BURY OR GMCA ON THIS MATTER.

“Where possible, place articles in:”

“Local newspapers;”

“‘Planzine’ - the department’s e-newsletter sent to a database of contacts and”

“Using other online news sources as appropriate.”

“Use posters on notice boards in prominent locations including town centres, civic suites, markets, leisure centres and public open spaces.” NOT DONE. EVERYWHERE HAS BEEN CHECKED. THE COUNCIL HAS DONE NOTHING IN THIS REGARD. THE BURY LIBRARIAN WAS ASKED WHERE THE POSTER WAS ON GMSF. HE SAID THERE WAS NONE, BUT THAT THE GMSF STUFF WAS IN A BOX BEHIND HIM.

2.2 This consultation is contrary to Bury Council's Statement of Community Involvement, and is clearly UNLAWFUL. <http://www.bury.gov.uk/index.aspx?articleid=10738>. Furthermore at least one officer at Bury has intentionally lied by writing to an official complainer stating that the council is in full compliance with the Statement. I expect that officer to be dismissed.

3 Allocating a Site of Biological Importance to Housing is illegal, gross negligence on the part of Bury Planners.

3.1 This is not just a deletion from the Greenbelt. **It is placing a Site of Biological Importance (Cyrus Ainsworth Nurseries and Parkers Lodges) which LPAs are required to protect in the planning process by numerous Central Government instructions, into a housing allocation.** It is illegal. The officers responsible for proposing this should be sacked. The National Planning Policy Framework states (Para 110) “In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity value”.....IT DOES NOT STATE PLANS SHOULD ALLOCATE TO HOUSING LAND WITH SITE OF BIOLOGICAL IMPORTANT STATUS, or indeed SPECIAL LANDSCAPE VALUE STATUS. The Walshaw Allocation is illegal. The NPPF also states (para 116) “Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest.....”

There is no exceptional need for this housing, and whilst in the Greenbelt the SBI is safe BUT the housing allocation/greenbelt deletion will certainly lead to the destruction of the SBI to make it developable. We have seen that happen to Bury's SBI's on several occasions – Edgar's Field (most recently), Spen Moor, Pilsworth Bleach Works, Chapelfield Lodges and Townside Fields and on Features of Ecological Value at Openshaw Fold.

4 Religious offence and widespread outrage

4.1 In doing what they have done the officers responsible have caused in me harm and offence to my religious sensibilities, and across the borough they have caused widespread distress and outrage. Bury has never before placed a Site of Biological Importance within a housing allocation and, with good fortune, the officers who did this will be dismissed and expelled from the profession. It is an offence to my religion to put wildlife and landscape in peril like this, and, as a religious outrage, the allocation should be withdrawn, and the responsible people removed from office. I have just as much right to make these claims as anyone else, from any religion.

5 Greenbelt Status

5.1 The allocation land has been assessed on behalf of AGMA as strong to moderate in terms of functionality as Greenbelt - "There is a strong sense of openness....The parcel plays a strong roll in checking the further sprawl of Tottington, Woolfold, Bury and Walshaw".

5.2 This area has been Greenbelt since the adoption of the Local Plans for Tottington and West Bury. It is strategic Greater Manchester Greenbelt allocated in the Greenbelt Subject Plan. The production of these plans involved a trade off – some land allocated to new housing; other land allocated to Greenbelt. The change of all this land to housing means contempt for the trade-off that was agreed at that time.

5.3 The Greater Manchester Structure Plan was adopted after approval by the Secretary of State in March 1981, and was later reviewed and superseded by a later version in 1986. The main themes of the 1981 Structure Plan were: 1 Urban concentration; 2 Redirection of development to the inner core; 3 Maintenance of the regional centre (linked to the regeneration of the inner areas of Manchester and Salford); 4 Resource and amenity conservation. These themes are still vital today and seem equally vital to the Northern Powerhouse ideals. You cannot grow and make strong and beautiful what you are seeking to destroy and squander and neglect. The GM green belt was designed to complement these efforts to regenerate existing urban areas.

5.4 The National Planning Policy Framework (NPPF) states (Para 79) "The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence." It goes on to state (Para 83) "Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period."

5.5 The UDP revised the Greenbelt boundaries at the time of the UDP (c1995). There were minor adjustments, additions and deletions, and the creation of a new strategic employment site at Bury Ground, which was removed from the Greenbelt. Bury Ground is still mostly empty 22 years later, with only the relocated Fire Station and police Station which their original bases are rotting in the town centre, standing derelict eyesores. This is what strategic removals from the greenbelt did to our town. Stole a country park and added dereliction. So are Bury planners fit to make such decisions like this again? I think not.

5.6 There are no exceptional circumstances here. Bury MBC can meet its actual housing requirements using existing land supply without affecting the Greenbelt. The GMSF Policy on Greenbelt states the 'Green Belt will be afforded strong protection in accordance with the National Planning Policy Framework.' The only thing exceptional about this is the stupidity and indeed incompetence of those involved in the preparation of the framework, and the exceptional nature of the breach of the Bury MBC's Statement of Public Consultation.

5.7 Fundamentally the Greenbelt grabs in Bury are totally contrary to this main theme of Greenbelt – NPPF Para 80 "To assist in urban regeneration, by encouraging the recycling of derelict and other urban land." We have seen that they would allow Bury to over supply housing without remediating and reusing any derelict land. We know from the Bury Ground experience (above) that it would encourage dereliction.

6 The importance of the allocation's Landscape Character

6.1 In terms of Landscape Character Areas as defined by Bury's abandoned Local Plan this is the largest and most visible and accessible "Fringe Industrial Book" landscape area. Allowing people to appreciate this distinctive area, the site is crossed with lanes and Public Rights of Way, with a Country Park Hotel, angling reservoirs, sports clubs and informal recreation areas. The site contains two wildlife hot-spots – Bolholt Lodges and Cyrus Ainsworth Nurseries with Parkers Lodges SBI. The farmed landscape supports Milk and Beef Cattle, Sheep, Horses and Donkeys. It is important for children to see farm animals and gain some understanding of food production. These are VERY visible animals, especially given the immediate proximity of the High School.

6.2 The area east of Walshaw between the two lodge groups around Owlbarrow is a Special Landscape Area of the Unitary Development Plan (UDP). This will be completely destroyed by the proposals.

7 The importance of the allocation's Recreational value

7.1 The land south of Parkers Lodges was allocated to recreation by the UDP to satisfy the needs of the population at the lifetime of the UDP, and this area was reduced with the relocation of the Bolton Road Sports Club to this site when their site was sold for housing land. The UDP states RT2/1/6 "The implementation of this site will be undertaken in conjunction with the adjacent residential development." Thus the existing public recreation site is SMALLER than intended by the UDP in terms of by size and by number of households it may serve. Parkers Lodges is also a recreational fishery, developed as such in recent years.

8 The importance of the allocation's Wildlife Value

Land designated for wildlife

8.1 The Site of Biological Importance in the south part of the allocation is an important bird habitat, whilst the included waterbodies support Frogs, Toads, Palmate Newts and Smooth Newts. The SBI is part of a UDP designated Wildlife Corridor which runs from the Irwell to the West Pennine Moors area along both sides of Elton Brook. The SBI boundary must be reassessed as part of the plan/framework process with a view to incorporating the eastern part of the nursery in the SBI.

8.2 The Bolholt Lodges chain might easily be designated a Site of Biological Importance except that reduced funding of the GMEU means many years is left between the review of sites. Whilst not a designated Wildlife Corridor the Bolholt chain and its stream through Walshaw most certainly is a wildlife corridor, only a severe lack of competence of the ecologist Bury MBC chose to define the Wildlife Corridor boundaries at the time of the UDP inquiry prevented its allocation then. The opportunity should be taken now to declare the chain and stream line and it fringes a Wildlife Corridor. Toads are recorded from the Reservoirs and Frogs and Palmate Newts are recorded by householders fringing the site.

8.3 The allocation has several UKBAP Priority Habitats – Rivers & Streams; Ponds; Hedgerows; Reed Beds; Lowland Fen; Open Mosaic Habitat; Wet Woodland; Eutrophic Standing Water;

8.4 Here is what the National Planning Policy Framework states (para 117): "To minimise impacts on biodiversity and geodiversity, planning policies should:

- plan for biodiversity at a landscape-scale across local authority boundaries;
- identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation;
- promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan."

8.5 So my requirement here is that the GMSF should designate additional wildlife corridors and another Site of Biological Importance, should extend Cyrus Ainsworth SBI (see below) and should protect all of these and the existing SBI and Wildlife Corridor and the linkages between in Greenbelt. They should not take this area out of Greenbelt and allocate it to housing.

Wildlife Corridors

8.6 At the Unitary Development Plan I presented as an objection to what had been proposed by the Council a revised set of wildlife corridors. The council hired an incompetent ecologist who had been negligent in numerous occasions on dealing with wildlife planning in Bury. The incompetent ecologist did not appear to even consider any of the additional corridors I proposed for Elton reservoir area. Thus I include them here. The GMSF must designate these as wildlife corridors. Corridors are linear chains of habitat of quality of landform. They include streams and river valleys,

blocks of woodlands and canals and railways. Wildlife links are tracts of open space between built up areas that are not defined in such a way but are open in nature and allow larger mammals to passage between areas. In the included plans, from that inquiry, the additional corridors are numbered and edged by a black line with an arrowheads pointing inwards (56, 57, 57, 59 – the pond in 9 was included). Wildlife Links are shown by open circles and L2. The Council proposed Corridor of that time is shown hatched and the Links limited to the canal, metrolink, motorway verges and the former Railwaylines. I proposed these become Corridors. See attached plan.

Protected Bat species

8.7 The South Lancashire Bat Group has kindly supplied me with records for this allocation area and the immediate streets around. A total of **six European and British Protected Species Bats** have been recorded in the 1 km radius circle around the Allocation site centred on Owlbarrow – **Common Pipistrelle, Soprano Pipistrelle, Noctule, Daubentons, Whiskered and Brown Long-eared** . Local people are keen to report they see bats. This means that the feeding areas around the water, woodland, scrubland, hedges and field margins are very important for protected Bats. The linear features are very important as flight paths. The Noctule, the Brown Long-eared 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 (e.g the entirety of the Nurseries, not just the SBI) and boosting water quality – developing in the two wetland corridors in this site will not help water quality. For Brown Long-eareds, which had a 20% decline over 7 years prior to UKBAP listing, the JNCC website shows a need to protect countryside buildings with roost potential as well as a landscape of woodland edges, hedgerows, small farm woodlands, deciduous and mixed woodland, and connectivity between these. This is what we have in the core areas of the two parts of this Greenbelt area. The advice specifically says this: “Ensure the retention and protection of older trees for roosts is included in land-use policies.” 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 creationpolicies. 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 housing allocation does quite the opposite.

Protected birds, Priority Species Birds, and Birds Of Conservation Concern

8.8 Cyrus Ainsworth Nurseries within the Site of Biological Importance was for years a location for the Bird-ringing Group given it is a birding hotspot. Records supplied to me this week (winter **2016/17**) by local people show that a wealth of urban edge farmland, woodland and waterside birds have been recorded across the whole Walshaw allocation, including Greater Spotted Woodpecker, Mute Swan (Amber List), Kingfisher (Amber List), Mallard (Amber), Barn Owl (WCA1.1) Tawny Owl (Amber List), Kestrel (Amber List), Dunnock (Amber List), House Sparrow (Red List), Starling (Red List). Red List species are of most conservation concern, and Amber listed birds are also of conservation concern. Because of massive falls in populations the House Sparrow and the Starling

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”— the protection of Starling winter roost sites is specifically cited. Birds of prey are testament to the abundance of small birds and small mammals that use the area, all part of the rich ecosystem.

8.9 The **Cyrus Ainsworth & Parkers Lodge SBI** citation says “Of particular note, is the over-wintering roost of Redwings and Fieldfares in the nursery. This is considered to be one of the best areas in the borough for these species. Other breeding birds include Tawny Owl, Willow Warbler, Chiffchaff, Chaffinch and Bluetit.” The Redwings (Red List) and Fieldfares (Red List) are dependent on the hedgerow berries that they forage from across the whole allocation area. The Kingfisher, the Barn Owl, the Redwing and the Fieldfare are specially protected birds under the Wildlife and Countryside Act Schedule 1.1. The area east of the SBI is also disused now and is increasingly valuable as a bird and mammal habitat. The Barn Owl (WCA1.1) and Tawny Owl (Amber List) need the small mammals and birds the area provides. The whole of the abandoned Nursery, within and outside the SBI is prime Willow Warbler (Amber List) habitat. Removal from the Greenbelt will ensure the whole SBI and adjacent habitats are destroyed to make them fit for housing. That will surely happen with this allocation. We have seen that happen to Bury’s SBI’s on several occasions – Edgar’s Field (most recently), Spen Moor, Pilsworth Bleach Works, Chapelfield Lodges and Townside Fields and on Features of Ecological Value at Openshaw Fold.

8.10 On 13/1/2017 Steven Higginbottom **confirmed at the SBI** the continued presence of Red list protected species Fieldfare, Redwing and Red list House Sparrow - and added Bullfinch (Amber, UKBAP Priority Species), Coot (AEAW2), Dipper (Amber), Goosander (AEAW2, MMS2), Tufted Duck (AEAW2, CMS2), Willow Tit (Red, UKBAP (and Local BAP) Priority Species,

8.11 Steven Higginbottom on 13/1/2017 paid a visit to the **Bolholt area**. He has updated a list found on Manchester Birding from 2011 of birds using the water, reedbed and adjacent fields at Bolholt Reservoir. Birds with an official scarcity status are were :

| | | | |
|---------|--------------------------|-------|-------------------------------------|
| 2017 | Redwing | Red | WCA1.1 (fully protected in UK Law!) |
| 2011 | Mediterranean Gull | Amber | AEAW2 CMS2 |
| | | | WCA1.1 (fully protected in UK Law!) |
| 2017 | Herring Gull | Red | AEAW2 UKBAP Priority Species |
| 2017 | House Sparrow | Red | UKBAP Priority Species |
| 2017 | Lesser Redpoll | Red | UKBAP Priority Species |
| 2017 | Song Thrush | Red | UKBAP Priority Species |
| 2017 | Starling | Red | UKBAP Priority Species |
| 2011 | Reed Bunting | Amber | UKBAP Priority Species |
| 2017 | Common Bullfinch | Amber | UKBAP Priority Species |
| 2011 | Lesser Black-backed Gull | Amber | AEAW2 CMS2 OSPAR |
| 2011 | Snipe | Amber | AEAW2 CMS2 |
| 2011/17 | Teal | Amber | AEAW2 CMS2 |
| 2011 | Oystercatcher | Amber | AEAW2 |
| 2011/17 | Common Gull | Amber | AEAW2 |
| 2011 | Mallard | Amber | AEAW2 |
| 2011/17 | Black-headed Gull | Amber | |
| 2011/17 | Tawny Owl | Amber | |
| 2017 | Duncock | Amber | |
| 2011 | Tufted Duck | | AEAW2 CMS2 |

| | | |
|---------|-----------|------------|
| 2011/17 | Moorhen | AEAW2 CMS2 |
| 2011 | Goosander | AEAW2 CMS2 |
| 2011/17 | Cormorant | AEAW2 |
| 2011 | Coot | AEAW2 |

Notes - Amber species are birds of some concern as set out above; WCA1.1 birds are fully protected by UK law; CMS2 is the Convention on Migratory Species Appendix 2, to which the UK is a signatory. Migratory species having an unfavourable conservation status for which Range States are encouraged to conclude international agreements for their benefit; AEAW2 is the Convention on Migratory Species, African-Eurasian Waterbirds Agreement - Annex II, to which the UK is a signatory. Conservation of migratory waterbirds, giving special attention to endangered species as well as to those with an unfavourable conservation status. OSPAR is the Convention which seeks to conserve seabirds birds which are vulnerable to the threats posed by the many competing human uses of the sea.

Priority Species Adder

8.12 A recent record of Adder has been given to me recently, found along the path along the north of the Nurseries. The Adder (JNCC website) is a UK Biodiversity Action Plan Priority Species, i.e. a 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.” “Taking account of/ or determining its presence during the early stages of local authority development plans, land allocation could significantly enhance its current conservation status, particularly in areas adjacent to or including areas of semi-natural habitatCountering the effects of habitat fragmentation at the local scale is a high priority. Planning access routes and recreation areas should take account of the effects of disturbance on this species.” Bury MBC has done nothing of the above in the preparation of this development plan.

Priority Species Toad and other amphibians

8.13 There are Toads breeding in these reservoirs. They use the deep waterbodies in this area 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 proposal will lead to a mass slaughter of Toads via massive habitat loss and getting trapped on kerbed roads, squashed on roads, falling into street grids - all totally contrary to government policy.

8.12 The farmland and abandoned Nursery has several small field ponds, copse ponds, filter beds and marshes, some of which support breeding amphibians – Frogs, Toads, Smooth Newts and

Palmate Newts. Toads scatter widely across this open area and are reported by householders bordering the site.

Other Priority Species mammals and other mammals

8.14 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 i.e. species “of principal importance for the purpose of conserving biodiversity” covered under section 41 (England) of the NERC Act (2006) and therefore needing 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.

8.15 The site has recently been shown to support **Badgers**. A road kill Badger has been reported from early-mid December on Lowercroft Road/High Street in the vicinity of Dow Lane. An animal killed crossing the road shows there is a territory or dispersal route encompassing both sides of High Street. Set needs to be searched for. Occupied Badger setts have a measure of legal protection.

8.16 Like Badger, **Roe Deer, Foxes and Rabbits** also frequent the area and they are dependent on the narrow wildlife corridors through the centre of Walshaw along the Brook and across High Street where the housing is ribbon development only. These are **vital wildlife corridors**. The presence of birds of prey indicates the sites value for small mammals.

Water Framework Directive

8.17 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.

A Green Infrastructure Asset

8.18 Now AGMA’s Green Infrastructure Framework Final Report of 2011 described Elton Vale, the southern quarter of the allocation, as a Green Infrastructure Asset. Bury’s Green Infrastructure – Advice on Strategy and Implementation of 2010 similarly identified as an Action Area a tract of land including Elton Brook. It will not be such an asset if it is confined to a narrow corridor between dense housing, with a Site of Biological Importance cleared and subsequently granted consent for lakeside housing.

9 Coal Mine and Flooding concerns

9.1 The Coal Authority Maps indicate shafts and horizontal workings across the allocation and reshaping the landform required by the development carries an environmental risk to hydrology and land stability including that of neighbouring residential properties.

9.2 Flooding has occurred recently amongst brand new properties on Scobell Street. At the time of the UDP inquiry and as a wetland ecologist I objected to the allocation of some of the proposed housing land alongside the brook, to maintain sufficient corridor for wildlife movement and of course flooding. I was ignored. Properties, approved by Bury MBCs planning professionals, flooded. Some years ago Bury Council applied for planning consent to culvert into a pipe and infill the lower parts of Elton Brook, ignoring the fact that, in flood, rivers spread and, if constrained, back up and cause flooding upstream. They gave themselves planning consent, and then were promptly refused permission to culvert by the Environment Agency. Serious consideration was also given to allowing parts of Barracks Lodge in Elton to be used for housing and part retained as a pond – serious flooding would have resulted.

10 Traffic

10.1 The development of this site for housing will have a severe impact on traffic by massively increasing it.

11 Quality of Life

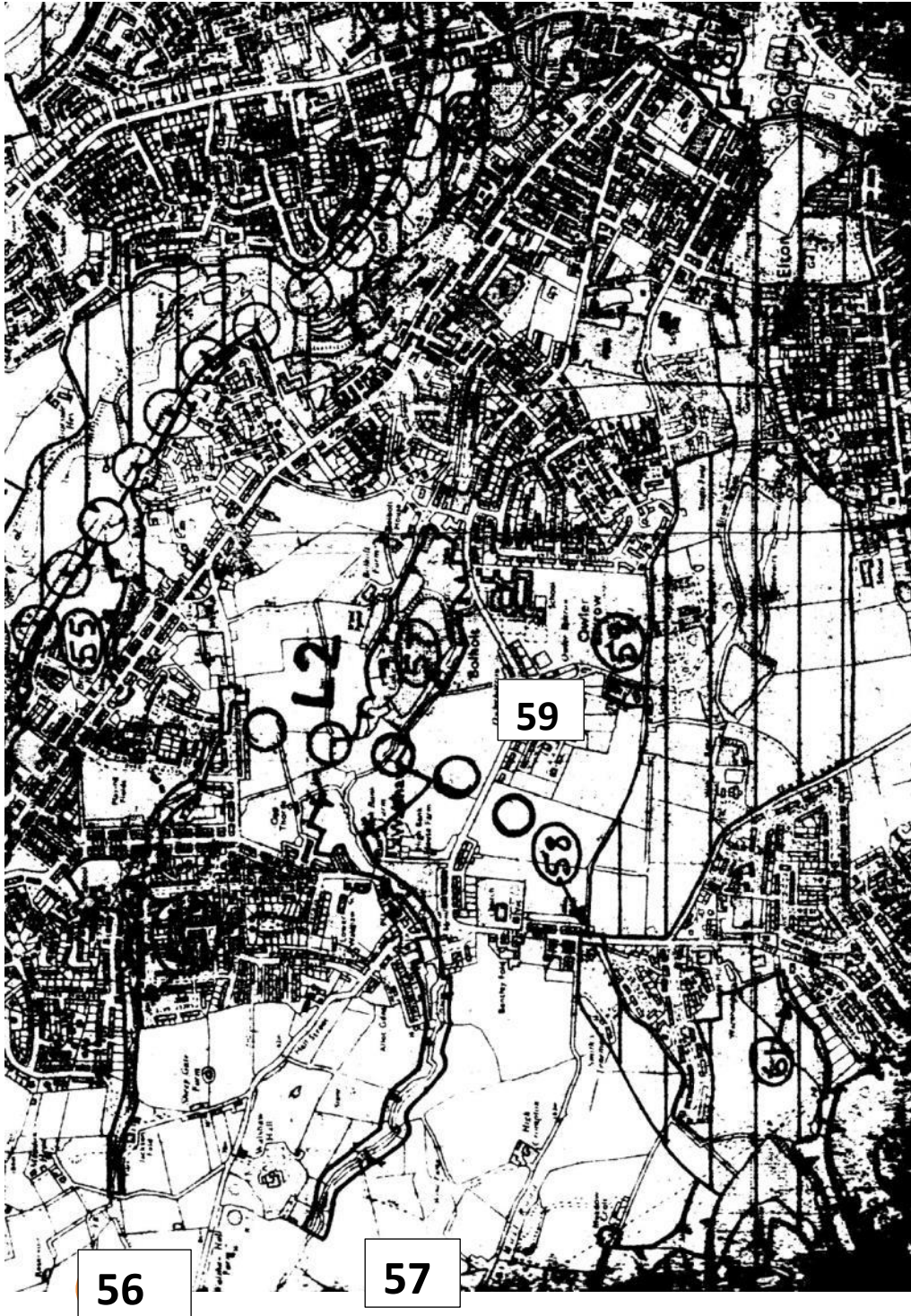
11.1 The development of this allocation for housing will massively impact on people's quality of life for the reasons outlined above.

I hereby object to this allocation

David Paul Bentley

Ecological Consultant – Aquatic Systems

Map of proposed Wildlife Corridors and Wildlife Link follows:



Map of proposed additional Wildlife Corridors and Wildlife Link