



Small copper by Matt Berry



Cheshire

People taking action for wildlife

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## Consultation for the Greater Manchester Spatial Framework

### Response from the Cheshire Wildlife Trust (March 2019)

#### Overview

The Cheshire Wildlife Trust is the leading conservation charity in the south Manchester area that focuses on all aspects of wildlife. In our response to the consultation for the Greater Manchester Spatial Framework 2019 we seek to represent the views of our 13,000+ local members, particularly those who live in Trafford, Stockport and Tameside.

There are a number of issues we would like to raise but in particular CWT is astonished that the seven criteria used to select allocation sites in the green belt failed to include any reference to environmental/ecological considerations. This failure has resulted in major conflicts with the proposed policies in section 8 of the GMSF – A Greener Greater Manchester.

Our responses to the policies and allocations are set out below:

#### 46 GM-G1 Valuing important landscapes

- A) We mostly agree but we would like to see the following considerations included in the list:
  - I. Landscapes that support important wildlife populations.
  - II. Functional connectivity of landscapes in relation to ecosystems and ecosystem services
- B) With the recent announcement of mandatory net gain for biodiversity we would like to see the following amendment in the explanatory paragraph ‘... especially in conjunction with securing a net enhancement of biodiversity...’
- C) We note that a net enhancement of geodiversity resources is not achievable in the timeframe of the GMSF and suggest that this is removed from the paragraph.

#### 47 GM-G2 Green Infrastructure Network

- A) We mostly agree with this policy and we strongly support the inclusion of the map of existing Priority Green Infrastructure in figure 8.2. However we feel that more accurate explanations and guidance are required to support this policy.

Working for wildlife across **Cheshire East, Cheshire West & Chester, Halton, Stockport, Tameside, Trafford, Warrington & Wirral.**

**Patron** The Duke of Westminster KG CB OBE TD CD DL  
**President** Felicity Goodey CBE DL **Chairman** Chris Koral  
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- B) The policy should firstly set out that GI covers both ecosystem/environmental services crucial for the quality of life but also ecological and wildlife considerations. These two functions are clearly explained in Natural England's 2015 definition '(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 managed 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'.
- C) The two distinct functions are also recognised in section 3.5 GMSF Priority Green Infrastructure and Ecological Networks report May 2018 "The Ecological Network essentially becomes a 'subset' of a green infrastructure network". This distinction should be clarified in policy GM-G2.
- D) Some areas of green infrastructure should be primarily set aside for ecological/environmental considerations. They will contribute to vital ecosystem services for humans (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.
- E) 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.
- F) If the distinction between the two types of GI cannot be made in this policy then a separate Ecological Network policy will be required in order to conform to the National Planning Policy Framework and the widely accepted definition of Green Infrastructure.

#### **48 GM-G3 River Valleys and waterways**

Agree

#### **49 GM-G4 Lowland wetlands and mosslands**

CWT mostly agrees with this policy particularly the references to protecting, enhancing and restoring these habitats. However there are a number of points where we think improvements could be made:

- A) we would like to see a greater emphasis on carbon storage in the main policy wording. This is different to carbon sequestration mentioned in point 2.

We suggest that the new wording should be:

'...with a strong emphasis on reconnecting local communities to the natural and historic environments and securing long-term carbon storage'

- B) 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 birds characteristic of the area such as curlew and lapwing or mammals such as the brown hare. We suggest the following amendment:
  1. 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.

C) 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 may not be suitable to introduce into open lowland wetlands and mosslands. Instead (as suggested by the Lancashire Wildlife Trust) we would like to see the following wording:

4. Increase features that act as stepping stones for locally characteristic wildlife moving through the area, and minimise barriers to movement'

D) Point 8.23 lists several sites including those within the Nature Improvement Area and Ashton Moss in Tameside as being 'significant in terms of their biodiversity and geodiversity resources'. We are therefore greatly concerned with inclusion of both Ashton Moss and Carrington Moss in the list of allocations as this seems to conflict with policy GM-G4.

In line with the aspirations of this policy we would like to see restoration of these two important sites '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' (paragraph 8.25)

**It is not clear why the priority Lowland Wetlands and Mosslands are not listed in policy GM-G4.**

#### **50 GM-G5 Uplands**

We broadly agree with the proposed policy wording.

#### **51 GM-G6 Urban greenspace**

We broadly agree with this policy but suggest that a further point is included

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

#### **52 GM-G7 Trees and woodland**

A) We support this policy and we particularly agree that protecting and enhancing 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.

However 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 points 4 and 10 (as suggested by the Lancashire Wildlife Trust)

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

10. 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.

- B) The policy should also recognise that some sensitive woodlands (particularly ancient woodlands) may benefit from reduced disturbance, particularly in the bird nesting season. Therefore we do not agree with the wording of point 9 and suggest the following wording:

9. Improving public access to woodland and trees whilst managing the associated pressures particularly to avoid damage and disturbance in sensitive areas.

### 53 GM-G8 Green Infrastructure Opportunities

We mostly disagree with the *details* of this policy.

- A) Strategic opportunities must be identified through evidence based mapping; for example Ecological Networks, biodiversity opportunity mapping and mapping locally identified wildlife corridors. Once this basic task is complete then integration with other policy drivers can be undertaken and GI opportunity areas identified to ensure physical and functional connectivity at all geographic levels. The map presented in figure 8.4 is inadequate and we suggest that it is reissued once the correct supporting work has been undertaken (we believe this is underway - section 9 *GMSF Priority Green Infrastructure and Ecological Networks* report May 2018).
- B) We concur with the Lancashire Wildlife Trust's consultation response when they highlight that this policy as it stands conflicts with 13 allocations that sit within the Great Manchester Wetlands Nature Improvement Area. The allocation supporting information does not reference the NIA and does not include appropriate measures to deliver or contribute to green infrastructure improvements.
- C) We cannot identify evidence that the following wording taken from policy GM-G8 is true for the majority of allocated sites. We believe the wording '*measures to achieve this have been included*' is a serious misrepresentation of the facts:  
*'Development within an around Green Infrastructure Opportunity Areas should be consistent with delivering major green infrastructure improvements within them 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 this have been included.*

### 54 GM-G9 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 to GM-G2). 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.

## 55 GM-G10 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 most important considerations in this policy should be the following:

- National policy (net gain) requirements are met;
  - Existing biodiversity assets are protected and enhanced as a first resort;
  - A positive impact on the integrity of ecological networks;
  - A positive impact on the recovery of priority species populations;
- A) We therefore suggest that the wording is amended to reflect this. In particular the wording should reflect that Net Gain for biodiversity will be mandatory for all new developments in England (as set out in the Chancellor's Spring Statement 2019)  
The first line of the policy should be amended to take account of the new mandated requirements. We suggest the following wording:  
  
'Net gains for biodiversity for new developments will be required to deliver an overall increase in biodiversity. This will be secured by:'
- B) 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. of the policy
1. *Increasing the quality, quantity, extent and diversity of habitats, particularly priority habitats identified in national or local biodiversity action plans and ~~these~~ habitats that support priority species.*
- C) 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.*
- D) In order to protect genetic biodiversity we would hope that the use of local provenance native species is encouraged (point 6) and suggest the following amendment:
6. *Encouraging the use of local provenance native species in habitat creation and landscaping schemes.*
- E) Taking into account that Net Gain for biodiversity is mandatory (Spring Statement 2019) additional guidance to securing Net Gain for biodiversity is required by the inclusion of a line to reference measurable Net Gain i.e.
- e. *A measurable net gain in biodiversity should be demonstrated through the use of a locally approved Net Gain metric i.e. the Defra metric (as updated). An approved Biodiversity Impact Calculator is the recommended tool to undertake the calculations.*

It is strongly recommended that the updated Defra metric (2019) 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.

## 56 GM-G11 Green Belt

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.

### Comments on allocations

**As we set out in our introductory paragraph CWT is astonished that the seven site selection criteria for sites in the green belt failed to include any reference to environmental/ecological considerations. This failure has resulted in major conflicts with the proposed policies in section 8 of the GMSF – A Greener Greater Manchester.**

**This fundamental omission has resulted in serious conflicts between many of the proposed allocations and the proposed 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 in figure 8.2 (Section 8 – A greener greater Manchester) is used to inform the location of the allocations. We would like to see all future large scale developments sitting outside of the existing priority green infrastructure and we are dismayed this does not appear to have been taken into account. We suggest that the allocations do not reflect the proposed policies and urge the council to rethink the proposals where major conflicts with the policies occur.**

## Stockport

### Allocation 34 Bredbury Park Extension

- According to the GMSF Topic paper 36.8% (13.35 ha) of the site conflicts with policy GM-G2 as it sits within the GMSF Green Infrastructure network.
- According to the GMSF Topic paper the allocation conflicts with policy GM-G10 as it overlaps with an existing site of Biological Importance (0.18%) and priority habitat (0.80%). In order to comply with policy GM-G10 this must be taken into consideration and the mitigation hierarchy applied.
- The allocation abuts Botany Mill Wood Site of Biological Importance. To comply with policy GM-G10 point 4. (protecting sites designated for their nature conservation and/or geological importance) a buffer will be required. This will help prevent damage and disturbance to the SBI and help stop the spread of invasive garden species and or predation by domestic pets. It will also be required to curb light pollution. We suggest a minimum buffer of 15m of semi-natural habitat is secured. This in line with the standing advice provided by Natural England in 2015 on ancient woodlands and veteran trees.
- Biodiversity Net Gain has been mandated for all developments in England (Chancellor's Spring Statement 2019) so this should be reflected in the published guidance for the development of this site i.e.

*A measurable net gain in biodiversity should be demonstrated through the use of a locally approved Net Gain metric i.e. the Defra metric (as updated). An approved Biodiversity Impact Calculator is the recommended tool to undertake the calculations.*

- There is evidence to suggest that BoCC<sup>1</sup> red listed birds such as yellow wagtail utilise this site. In order to comply with the mitigation hierarchy as set out in policy GM-G10 measures will be required if this species or other priority species utilise this site.

### **Allocation 35 Former Offerton High School**

- The allocation abuts Poise Brook and Goyt Valley Site of Biological Importance and Ancient Woodland. To comply with policy GM-G10 point 4. (protecting sites designated for their nature conservation and/or geological importance) a buffer will be required. This will help prevent damage and disturbance to the SBI and help stop the spread of invasive garden species and or predation by domestic pets. It will also be required to curb light pollution. We suggest a minimum buffer of 15m of semi-natural habitat is secured. This in line with the standing advice provided by Natural England in 2015 on ancient woodlands and veteran trees.
- Biodiversity Net Gain has been mandated for all developments in England (Chancellor's Spring Statement 2019) so this should be reflected in the published guidance for the development of this site i.e.  
*A measurable net gain in biodiversity should be demonstrated through the use of a locally approved Net Gain metric i.e. the Defra metric (as updated). An approved Biodiversity Impact Calculator is the recommended tool to undertake the calculations.*
- There is evidence to suggest that BoCC<sup>2</sup> red listed birds such as curlew and spotted flycatcher utilise this 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 GM-G10 measures will be required if these species or other priority species utilise this site.
- The site conflicts with policy GM-G2 as at least part of it sits within the GMSF Green Infrastructure network.

### **Allocation 36 Gravel Bank road/Unity mill**

- According to the GMSF Topic paper 100% (4.85 ha) of the site conflicts with policy GM-G2 as it sits within the GMSF Green Infrastructure network.
- According to the GMSF Topic paper the allocation conflicts with policy GM-G10 as it overlaps with an existing site of Biological Importance (1.06%) and priority habitat (0.01%). In order to comply with policy GM-G10 this must be taken into consideration and the mitigation hierarchy applied.
- The allocation abuts Peak Forest Canal South Site of Biological Importance and priority semi-natural woodland at Unity Mills. To comply with policy GM-G10 point 4. (protecting sites designated for their nature conservation and/or geological importance) a buffer will be required. This will help prevent damage and disturbance to the SBI and help stop the spread of invasive garden species and or predation by domestic pets. It will also be required to curb light pollution. We suggest a minimum buffer of 15m of semi-natural habitat is secured. This in line with the standing advice provided by Natural England in 2015 on ancient woodlands and veteran trees.
- Biodiversity Net Gain has been mandated for all developments in England (Chancellor's Spring Statement 2019) so this should be reflected in the published guidance for the development of this site i.e.

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<sup>1</sup> Birds of Conservation Concern 4 published by the BTO 2015

<sup>2</sup> Birds of Conservation Concern 4 published by the BTO 2015

*A measurable net gain in biodiversity should be demonstrated through the use of a locally approved Net Gain metric i.e. the Defra metric (as updated). An approved Biodiversity Impact Calculator is the recommended tool to undertake the calculations.*

### **Allocation 37 Heald Green**

- This site has a good hedgerow network, native hedgerows are a priority habitat and in order to comply with policy GM-G10 this must be taken into consideration and the mitigation hierarchy applied.
- Biodiversity Net Gain has been mandated for all developments in England (Chancellor's Spring Statement 2019) so this should be reflected in the published guidance for the development of this site i.e.

*A measurable net gain in biodiversity should be demonstrated through the use of a locally approved Net Gain metric i.e. the Defra metric (as updated). An approved Biodiversity Impact Calculator is the recommended tool to undertake the calculations.*

### **Allocation 38 High Lane**

- The allocation abuts Norbury Brook & Middlewood SBI woodland priority habitat. To comply with policy GM-G10 point 4. (protecting sites designated for their nature conservation and/or geological importance) a buffer will be required. This will help prevent damage and disturbance to the SBI and help stop the spread of invasive garden species and or predation by domestic pets. It will also be required to curb light pollution. We suggest a minimum buffer of 15m of semi-natural habitat is secured. This in line with the standing advice provided by Natural England in 2015 on ancient woodlands and veteran trees.
- Biodiversity Net Gain has been mandated for all developments in England (Chancellor's Spring Statement 2019) so this should be reflected in the published guidance for the development of this site i.e.

*A measurable net gain in biodiversity should be demonstrated through the use of a locally approved Net Gain metric i.e. the Defra metric (as updated). An approved Biodiversity Impact Calculator is the recommended tool to undertake the calculations.*

- There is evidence to suggest that brown hare may utilise this site. In order to comply with the mitigation hierarchy as set out in policy GM-G10 measures will be required if this species or other priority species utilise this site.

### **Allocation 39 Hyde bank meadows**

- According to the GMSF Topic paper 29% (4.08 ha) of the site conflicts with policy GM-G2 as it sits within the GMSF Green Infrastructure network.
- According to the GMSF Topic paper the allocation conflicts with policy GM-G10 as it overlaps with priority habitat (4.33%). In order to comply with policy GM-G10 this must be taken into consideration and the mitigation hierarchy applied.
- Biodiversity Net Gain has been mandated for all developments in England (Chancellor's Spring Statement 2019) so this should be reflected in the published guidance for the development of this site i.e.



*A measurable net gain in biodiversity should be demonstrated through the use of a locally approved Net Gain metric i.e. the Defra metric (as updated). An approved Biodiversity Impact Calculator is the recommended tool to undertake the calculations.*

- There is evidence to suggest that BoCC<sup>3</sup> red listed birds such as yellow wagtail, curlew and spotted flycatcher utilise this site as well as priority reptiles species. 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 GM-G10 measures will be required if these species or other priority species utilise this site.

#### **Allocation 40 Griffin Farm Stanley Green**

- According to the GMSF Topic paper the allocation conflicts with policy GM-G10 as it overlaps with 4.2ha of priority habitat (4.89%). In order to comply with policy GM-G10 this must be taken into consideration and the mitigation hierarchy applied.
- The site comprises an excellent priority hedgerow network with small fields (possibly Lowland Meadow priority habitat). There are two traditional orchards (priority habitat) within the site and numerous ponds. These are likely to support Great Crested Newts and dragonflies as they are part of a larger pond network which extends into Cheshire East. Part of the network has been designated a Local Wildlife Site in part for its high quality ponds.
- Biodiversity Net Gain has been mandated for all developments in England (Chancellor's Spring Statement 2019) so this should be reflected in the published guidance for the development of this site i.e.

*A measurable net gain in biodiversity should be demonstrated through the use of a locally approved Net Gain metric i.e. the Defra metric (as updated). An approved Biodiversity Impact Calculator is the recommended tool to undertake the calculations.*

**The Cheshire Wildlife Trust objects to the development of this site due to the extensive area of priority habitat that will be impacted.**

#### **Allocation 41 Woodford Aerodrome**

- According to the GMSF Topic paper 10.28% (12.28 ha) of the site conflicts with policy GM-G2 as it sits within the GMSF Green Infrastructure network.
- According to the GMSF Topic paper the allocation conflicts with policy GM-G10 as it contains 1.48ha priority habitat (1.24%). In order to comply with policy GM-G10 this must be taken into consideration and the mitigation hierarchy applied.
- Biodiversity Net Gain has been mandated for all developments in England (Chancellor's Spring Statement 2019) so this should be reflected in the published guidance for the development of this site i.e.

*A measurable net gain in biodiversity should be demonstrated through the use of a locally approved Net Gain metric i.e. the Defra metric (as updated). An approved Biodiversity Impact Calculator is the recommended tool to undertake the calculations.*

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<sup>3</sup> Birds of Conservation Concern 4 published by the BTO 2015

- BoCC<sup>4</sup> red listed birds such as yellow wagtail, lapwing, curlew and priority species European brown hare have all 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>). The brown hare population at this site is particularly high and was previously considered significant at a county scale. In order to comply with the mitigation hierarchy as set out in policy GM-G10 measures will be required if these species or other priority species utilise this site.
- The allocation abuts Isles Wood Local Wildlife Site in Cheshire East. To comply with policy GM-G10 point 4. (protecting sites designated for their nature conservation and/or geological importance) a buffer will be required. This will help prevent damage and disturbance to the SBI and help stop the spread of invasive garden species and or predation by domestic pets. It will also be required to curb light pollution. We suggest a minimum buffer of 15m of semi-natural habitat is secured. This in line with the standing advice provided by Natural England in 2015 on ancient woodlands and veteran trees.

**The Cheshire Wildlife Trust objects to the development of this site due to the importance of the priority species and species assemblages that utilise the former aerodrome.**

## Tameside

### Allocation 42 Ashton Moss West

- Biodiversity Net Gain has been mandated for all developments in England (Chancellor's Spring Statement 2019) so this should be reflected in the published guidance for the development of this site i.e.  
*A measurable net gain in biodiversity should be demonstrated through the use of a locally approved Net Gain metric i.e. the Defra metric (as updated). An approved Biodiversity Impact Calculator is the recommended tool to undertake the calculations.*
- There is evidence to suggest that BoCC<sup>5</sup> red listed birds such as curlew utilise the site and priority species wall butterfly and black poplar have been recorded. 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 GM-G10 measures will be required if these species or other priority species utilise this site.
- The site lies on 'deep peaty soils' and therefore development of the site conflicts with point 8 of policy GM-G10 i.e. '.....particularly to ensure protection of peat-based soils'.

### Allocation 43 Godley Green Garden Village

- According to the GMSF Topic paper 12.69 ha of the site conflicts with policy GM-G2 as it sits within the GMSF Green Infrastructure network.
- According to the GMSF Topic paper the allocation conflicts with policy GM-G10 as it contains approximately 6.14 ha SBI and approximately 5.5ha priority habitat. In order to comply with policy GM-G10 this must be taken into consideration and the mitigation hierarchy applied.

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<sup>4</sup> Birds of Conservation Concern 4 published by the BTO 2015

<sup>5</sup> Birds of Conservation Concern 4 published by the BTO 2015

- The site incorporates Brookfold Wood SBI which is Ancient Woodland and Lowland meadow, both priority habitats. The site also overlaps with Werneth Brook SBI and priority woodland at Rushfield Farm. All of these sites must be excluded from the allocation to comply with GMSF policies and the NPPF.
- Biodiversity Net Gain has been mandated for all developments in England (Chancellor's Spring Statement 2019) so this should be reflected in the published guidance for the development of this site i.e.  
*A measurable net gain in biodiversity should be demonstrated through the use of a locally approved Net Gain metric i.e. the Defra metric (as updated). An approved Biodiversity Impact Calculator is the recommended tool to undertake the calculations.*
- BoCC<sup>6</sup> red listed birds such as yellow wagtail, spotted flycatcher and priority species European brown hare have all been recorded at the site.
- This site incorporates an extensive hedgerow network with numerous streams and small woodlands. These are also likely to be priority habitats.

**The Cheshire Wildlife Trust strongly objects to the development of this site due to the extent of priority habitats and designated SBI and priority species that will be directly impacted. Securing biodiversity Net Gain for this site may not be possible due to the current high value of the site. This site will also have an extremely high ecosystem services value so development here is highly likely to be considered unsustainable.**

#### **Allocation 44 South of Hyde**

- The allocation abuts Pole Bank North Site of Biological Importance. To comply with policy GM-G10 point 4. (protecting sites designated for their nature conservation and/or geological importance) a buffer will be required. This will help prevent damage and disturbance to the SBI and help stop the spread of invasive garden species and or predation by domestic pets. It will also be required to curb light pollution. We suggest a minimum buffer of 15m of semi-natural habitat is secured. This in line with the standing advice provided by Natural England in 2015 on ancient woodlands and veteran trees.
- Biodiversity Net Gain has been mandated for all developments in England (Chancellor's Spring Statement 2019) so this should be reflected in the published guidance for the development of this site i.e.  
*A measurable net gain in biodiversity should be demonstrated through the use of a locally approved Net Gain metric i.e. the Defra metric (as updated). An approved Biodiversity Impact Calculator is the recommended tool to undertake the calculations.*
- The site incorporates habitats which are likely to qualify as priority habitats including marshy grassland, hedgerows and semi-natural woodland. The mitigation hierarchy should be applied to comply with policy GM-G10.
- There is evidence to suggest that BoCC<sup>7</sup> red listed birds such as curlew utilise the site and priority species small heath butterfly and black poplar have been recorded. Curlew are classed as globally near threatened and are possibly the UK's most important bird conservation priority

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<sup>6</sup> Birds of Conservation Concern 4 published by the BTO 2015

<sup>7</sup> Birds of Conservation Concern 4 published by the BTO 2015

(<https://www.bto.org/science/latest-research/decline-curlew>). In order to comply with the mitigation hierarchy as set out in policy GM-G10 measures will be required if these species or other priority species utilise this site.

- The site conflicts with policy GM-G2 as at least part of it sits within the GMSF Green Infrastructure network.

#### **Allocation 45 New Carrington**

- Allocation of this site conflicts with policy GM-G2 as it sits within the GMSF Green Infrastructure network.
- The site incorporates Broadoak Wood SBI, Wetland at Carrington Moss SBI, Altricham sewage works SBI, Reedbed by Ship Canal Sidings SBI, Carrington Power Station SBI, Dark Lane tip SBI. All of these sites must be excluded from the allocation to comply with GMSF policies and the NPPF.
- Biodiversity Net Gain has been mandated for all developments in England (Chancellor's Spring Statement 2019) so this should be reflected in the published guidance for the development of this site i.e.

*A measurable net gain in biodiversity should be demonstrated through the use of a locally approved Net Gain metric i.e. the Defra metric (as updated). An approved Biodiversity Impact Calculator is the recommended tool to undertake the calculations.*

- In addition to the designated SBIs this site incorporates small woodlands, riparian habitat and extensive areas of open mosaic habitat. There is also ancient woodland and a traditional orchard. The mitigation hierarchy should be applied to comply with policy GM-G10 and national planning policies and all these areas should be excluded from the allocation.
- The site lies on 'deep peaty soils' and therefore development of the site conflicts with point 8 of policy GM-G10 i.e. '.....particularly to ensure protection of peat-based soils'. We also refer you to our response to policy GM-G4 Lowland Wetlands and Mosslands.
- Carrington moss is particularly important for the populations of breeding and wintering birds it supports including BoCC<sup>8</sup> red listed birds such as yellow wagtail, spotted flycatcher, corn bunting, curlew, lapwing, willow tit and priority species European brown hare, water vole and reptiles have all 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 GM-G10 and national planning policies, measures will be required to mitigate the impacts on these important species.

**The Cheshire Wildlife Trust strongly objects to the development of this site due to the extent of priority habitats and designated SBIs and priority species that will be directly impacted. Securing biodiversity Net Gain for this site may not be possible due to the current high value of the site. This site will also have an extremely high ecosystem services value so development here is highly likely to be considered unsustainable.**

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<sup>8</sup> Birds of Conservation Concern 4 published by the BTO 2015

### **Allocation 46 Timperley Wedge**

- Biodiversity Net Gain has been mandated for all developments in England (Chancellor's Spring Statement 2019) so this should be reflected in the published guidance for the development of this site i.e.

*A measurable net gain in biodiversity should be demonstrated through the use of a locally approved Net Gain metric i.e. the Defra metric (as updated). An approved Biodiversity Impact Calculator is the recommended tool to undertake the calculations.*

- This site incorporates an area of semi-natural woodland, several ponds and areas of semi-natural grassland at Davenport Green. An area of ancient woodland is included within a safe-guarded area. The mitigation hierarchy should be applied to comply with policy GM-G10 and national planning policies and all these areas should be excluded from the allocation.
- Allocation of this site conflicts with policy GM-G2 as part of the site sits within the GMSF Green Infrastructure network.

**Cheshire Wildlife Trust**

**RG 18/03/19**