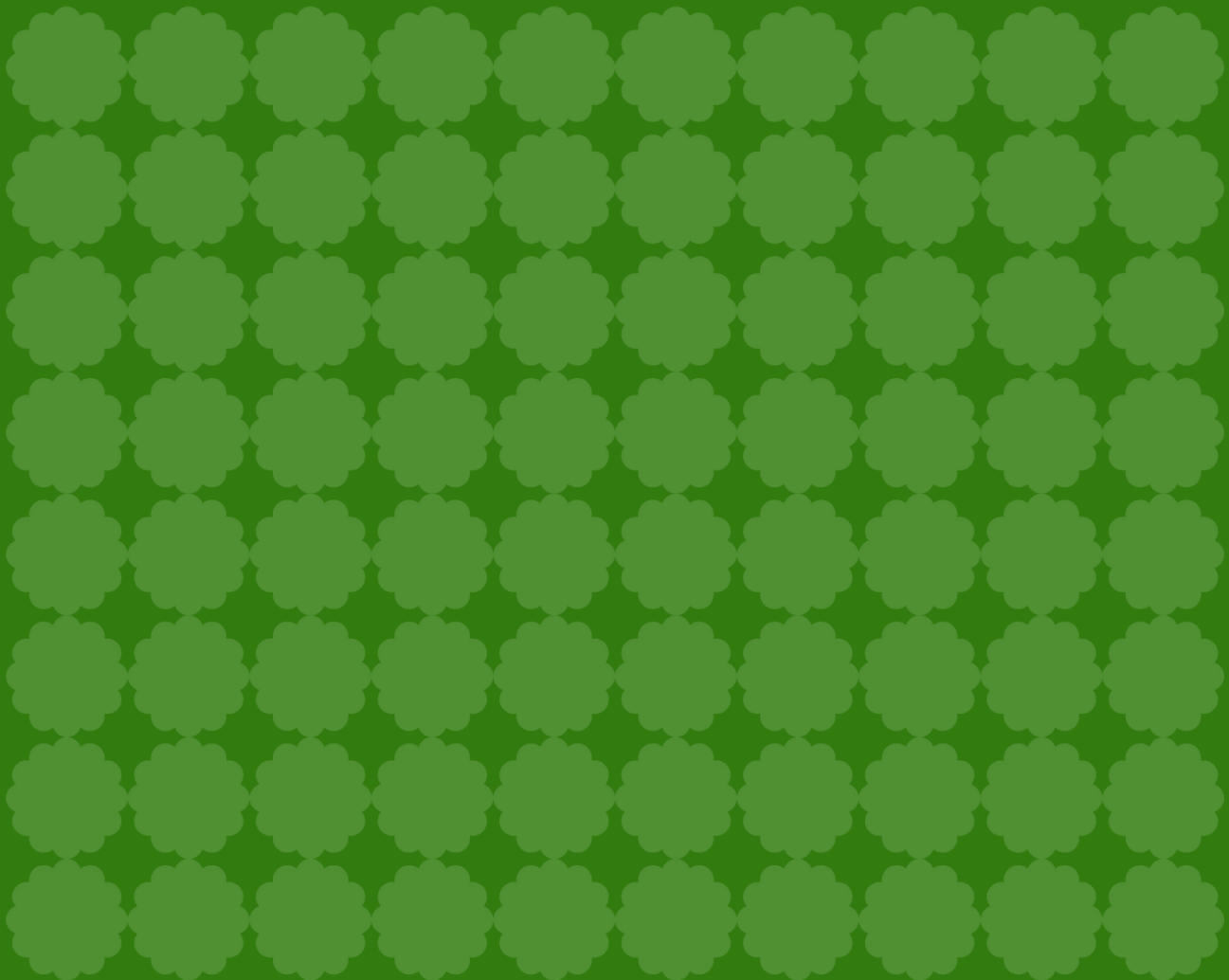


# Greater Manchester Local Nature Recovery Strategy

## Public Consultation Report: Record of Responses



# Contents

Introduction.....	3
Visions, Aims and Targets .....	5
Priorities and Actions .....	28
Nature Network.....	103
Farmers, Landowners and Land Managers .....	161
Glossary – Acronyms.....	279

# Introduction

## Local Nature Recovery Strategies

Introduced under the Environment Act 2021, Local Nature Recovery Strategies (LNRS) are a new, England-wide system of statutory spatial strategies that aim to establish priorities and map proposals for specific actions to drive nature's recovery and provide wider environmental benefits<sup>1</sup>.

The Greater Manchester LNRS has been developed to set out how we can all work together towards a greener city region where nature is thriving and where we need to focus our efforts to have the biggest impact. It is a strategic document, covering the ten local authorities in Greater Manchester.

You can view the version of the Strategy that was consulted on by visiting the Greater Manchester Combined Authority (GMCA) website<sup>2</sup>.

## About the Public Consultation

The public consultation ensured that residents and stakeholders had the opportunity to shape the LNRS. The feedback collected will help us gain local knowledge and ensure that we can get the strategy right for residents and business in Greater Manchester.

As required by statutory guidance<sup>3</sup>, this report contains all anonymised responses to the public consultation conducted by GMCA.

## Structure of the Consultation

The public consultation was open 15<sup>th</sup> November 2024 until 31<sup>st</sup> January 2025, an 11-week consultation period.

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<sup>1</sup> Defra (2023) Policy paper Local Nature Recovery Strategies, Available on the Defra website (external link): <https://www.gov.uk/government/publications/local-nature-recovery-strategies/local-nature-recovery-strategies>

<sup>2</sup> GMCA Local Nature Recovery Strategy webpages, Available on the GMCA website: <https://www.greatermanchester-ca.gov.uk/what-we-do/environment/natural-environment/our-plan-for-nature-recovery/>

<sup>3</sup> Defra (2023) Local nature recovery strategy statutory guidance - What a local nature recovery strategy should contain Available on the Defra website (external link) [https://assets.publishing.service.gov.uk/media/6421a4bdf97a8001379ecf1/Local\\_nature\\_recovery\\_strategy\\_statutory\\_guidance.pdf](https://assets.publishing.service.gov.uk/media/6421a4bdf97a8001379ecf1/Local_nature_recovery_strategy_statutory_guidance.pdf)

The consultation comprised two principal ways of providing feedback:

- Via a survey, available online via GM consult or a paper copy
- Via email

The consultation asked consultees for their feedback on key components in the strategy including the vision, aims, targets, priorities and actions, Nature Network and a subsection specifically for farmers, landowners and land managers.

In total GMCA received over 10,000 views or visits across all GMCA LNRS pages on our website and 427 responses to the public consultation.

### **Purpose of this report**

This document contains all the responses and comments received by GMCA through the public consultation to each of the questions asked.

The questions and comments are presented as they were received, so may contain spelling and grammatical errors. A short glossary of acronyms used is available at the end of the document.

### **Redaction of personal information**

To publish these responses, we have removed any information that may identify specific individuals, such as names, details about their address, phone numbers or email addresses, that were included in some comments. Some responses deemed to be defamatory, or offensive were also removed. In all such instances, these have been replaced by the words “REDACTED”.

# Visions, Aims and Targets

## 1. Which of the LNRS aims do you consider the most urgent?

There were 371 responses to this part of the question.

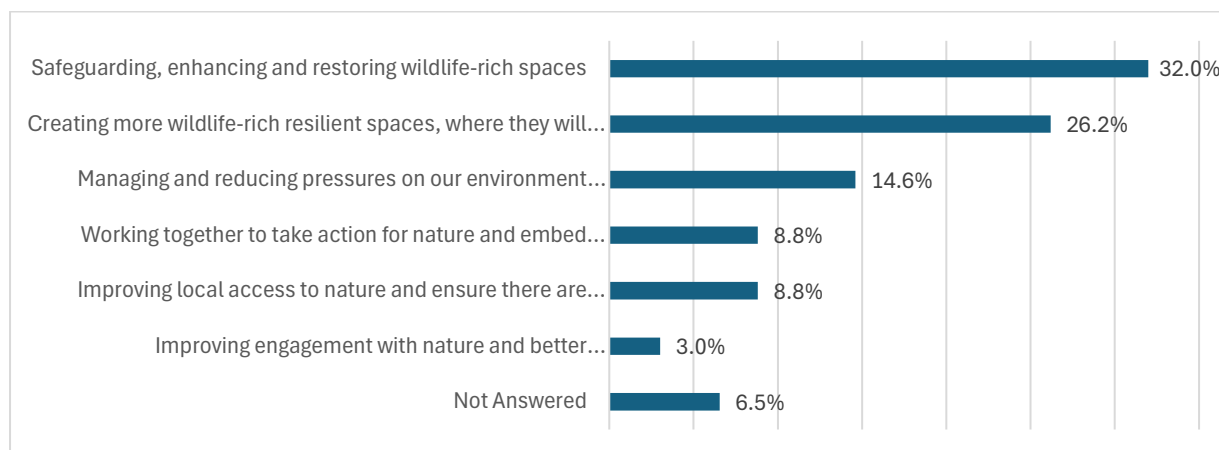


Figure 1 – Percentage of respondents that considered each of the aims to be most urgent.

Option	Total	Percentage
<b>Safeguarding, enhancing and restoring wildlife-rich spaces</b>	127	32.0%
<b>Creating more wildlife-rich resilient spaces, where they will expand and connect spaces for wildlife and people</b>	104	26.2%
<b>Managing and reducing pressures on our environment and waterways, and maximising nature's role in adapting the city-region to climate change</b>	58	14.6%
<b>Working together to take action for nature and embed space for nature and people to thrive across all our communities</b>	35	8.8%
<b>Improving local access to nature and ensure there are more opportunities to enjoy nature, in those areas that need it the most</b>	35	8.8%
<b>Improving engagement with nature and better understanding its value in our lives</b>	12	3.0%
<b>Not answered</b>	26	6.5%

Table 1 - Number and percentage of respondents that considered each of the LNRS aims to be most urgent.

## 2. Are they the right aims for Greater Manchester?

There were 374 responses to this part of the question.

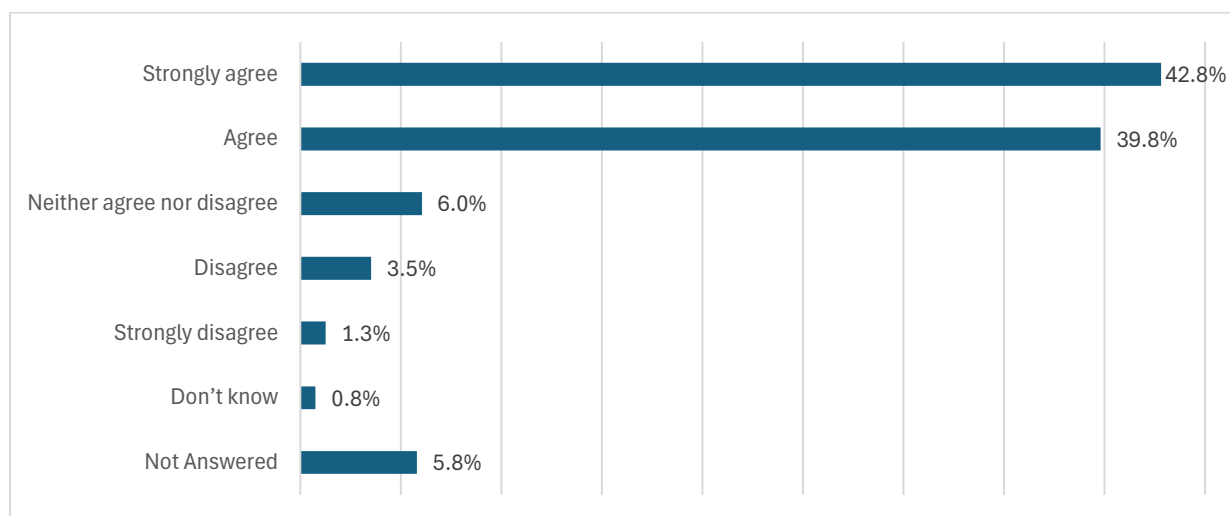


Figure 2 - Percentage of respondents that agreed or disagreed that they are the right aims.

Option	Total	Percentage
Strongly agree	170	42.8%
Agree	158	39.8%
Neither agree nor disagree	24	6.0%
Disagree	14	3.5%
Strongly disagree	5	1.3%
Don't know	3	0.8%
Not Answered	23	5.8%

Table 2 – Number and percentage of respondents that agreed or disagreed that they are the right aims for GM.

If you disagree or strongly disagree, what would you change and why?

There were 47 responses to this part of the question.

- It is essential that the aims guide policy and practice eg. planning decisions that contradict these aims should not be allowed
- There are almost no birds or butterflies left.
- No mention of possible employment opportunities that might be created by environmental work needed to achieve these aims.
- Stop concreting over everything

- I'd prioritise improving understanding of nature's benefits because I think a lot of people are influenced by a strong anti-nature message that's coming from online sources, which will need a concerted focus to counteract
- I'm more interested in protecting habitats and species than promoting public access.
- I am sorry not to see any mention of geology. even though many SSSIs are for geology and there are RIGS in Greater Manchester
- They do not go far enough
- Need to connect diet with loss of nature - sign plant based treaty
- How about: A more nature connected and resilient city? to spark a change in cultural view of what it means to be human. What about a vision of being a bee friendly city. If we had that as our core aim, then a lot of the other things would flow from that. It could engage the public, schools etc to look at making gardens bee friendly and so on. Through focusing on the bee, to connect with idea that we are foundationally dependent on nature, not it on us! it would be a target that could be monitored and people could witness bees in their own gardens.
- I live in REDACTED in between REDACTED and REDACTED, both of which have protective status, yet wigan council and the canal trust want to build houses, that nobody wants, on the land in-between them at REDACTED. So I would say you really dont want this land to also be protected. REDACTED has been over built, this land should also be protected!!
- Please prioritise housing over the environment. I cannot take these yearly rent increases anymore. My family is stuck in a small starter flat and the landlord keeps increasing the rent. We cannot afford to buy our own home as prices just keep increasing. We need to build more homes as working families like mine are really struggling. The only green space we will need in the future will be a park where we can live in a tent. It's so sad
- Need more jobs to do with nature. Its ok having this policy, but where are the jobs.
- The opportunity areas mapping is a great start to show the potential for nature restoration. However, without sites being protected ie backed by legislation and policy this won't likely be achieved.
- I agree, although I would add that a key aim should be to ensure that the development community are fully on board and supported to deliver the required changes, and that LPAs have the tools and resources available to deliver good planning and urban design outcomes.

- We believe protecting what we have is the most urgent priority for our city and region. However, each of these aims must be done together and we are keen that that other council strategies (e.g. Transport) also work to support them.
- There's nothing in about getting to the best spaces for nature. E.g. in Bolton, Rivington & the winter hill area has v poor bus access, only via a summer Sunday bus via Rivington La led by the SE Lancs community rail partnership. Walker fold involves a 20 min walk along a road with no pavement from Chorley Old Rd bus stops. There are no safe cycle routes & little cycle parking. Free car parking & poor public transport access makes these areas v busy with cars & unattractive for walking or cycling to get there. People living in more deprived areas are less likely to live close to these areas & less likely to have cars. Transport is a major carbon emitter contributing to climate & biodiversity emergencies. GM has the opportunity to address this with public transport & active travel elements to the bee network.
- I would change the aims of the Greater Manchester Planning system because it is tilted in favour of the general destruction of local nature and the environment. The re-badged Greater Manchester Spatial Framework needs to be revised to remove the series of Green Belt development policies that are diametrically opposed to any aims that are being promoted by the draft Local Nature Recovery strategy.
- I think the aims are good however i think they need to be broader. There is nothing considering jobs, timber, commercial forestry which would help achieve a lot of the aims and objectives within the strategy. Where suitable and appropriate, a large commercial woodland could help achieve many goals following the UKFS. This would also be much more sustainable from an economic side creating jobs for now and the future and securing timber for the UK instead of importing. We currently import 80% of our timber when this could be grown on our door steps. The many commercial forests i visit often have the animals mentioned in the strategy and more. They are also thriving within that environment. Most of the aims listed can be achieved within a UKFS compliant large commercial plan.
- we have green areas which maintain people and mammals but have poor or no infrastructure repair and maintenance programmes and budgets and footpaths are mud baths so improvement in what we have in post industrial greater manchester is everything. We need to conserve foraging areas for GM mammals and flora and improve accessibility though path repair

- We need to consider how business and industry operates in Manchester, at a policy level. This may come under the managing pressures umbrella but it would be helpful to specifically target this topic. The operational impact of the city far outweighs the benefits of green spaces.
- It should have more focus on climate change resilience
- The 1st option (Safeguarding existing) and the 2nd (Creating more) are equally important. Creating new natural green spaces as compensation for loss of existing natural green spaces to development is not acceptable. The GMLNRS and policies related should NOT become a tool of mitigation/compensation for developers.
- The aims are poorly worded as doesn't define what kinds of green spaces – it would be possible to achieve that by building a tower block full of people next to a bowling green, or on half of a nature space like Ryebank Fields. The aims should mention biodiversity of green spaces, not just whether they are green or not. We have a need to access natural green spaces with wildlife, not just grass.
- we need to urgently safeguard the urban wild spaces that we already have - like Ryebank Fields in Chorlton
- Too much focus on people - of course people need to be brought on the journey, highlighting benefits to them and involving them in its achievement, but a Nature strategy should be all about what's right for GM biodiversity. It's up to other strategies/politics to balance this with considering human needs.
- Dear GM Nature Recovery, Please find below a considered response from Bolton and Bury Swifts Conservation Group, which focuses on Swifts and House Martins within the GM Strategy. Under the section:- \*Working together to take action for nature and embed space for nature and people to thrive across all our communities\* And "Urban" We disagree with the plan and would like to submit the following:- Building-dependent birds are overlooked by the main priorities and are also overlooked by DEFRA net gain methodology. Text relating to Swifts and House Martins is of course very welcome but our group would request further specifics in terms of the wording for these declining Red List species as current wording in the plan is brief and does not spell out in detail what Local Authorities can and should do. The existing nest sites of Red List Swifts and House Martins will typically be located in or on buildings; these should be retained and protected where possible, and mitigation provided when retention is not possible; Nest boxes should be integrated \*swift bricks\* where possible; these are universal nest bricks

for cavity-nesting small bird species, they're permanent with no maintenance requirements and unlike Sparrow Terraces they can be used by Swifts and Sparrows alike. New build development including extensions should follow best-practice guidance such as British Standard BS 42021, which promotes Swift Bricks as the integrated bird brick to use. Artificial nest cups for House Martins may be installed instead where recommended by an ecologist. Further note; Our surveys show existing colonies are frequently (but not exclusively) found on Social Housing. Any works to the exterior of the buildings by Housing Associations and Local Authorities should include appropriate mitigation, by retaining open eaves style or provision of Swift Nest boxes or bricks and take place outside the breeding season of May to August.

- Dear GM Nature Recovery, Please find below a considered response from Bolton and Bury Swifts Conservation Group, which focuses on Swifts and House Martins within the GM Strategy. Under the section:- \*Working together to take action for nature and embed space for nature and people to thrive across all our communities\* And "Urban" We disagree with the plan and would like to submit the following:- Building-dependent birds are overlooked by the main priorities and are also overlooked by DEFRA net gain methodology. Text relating to Swifts and House Martins is of course very welcome but our group would request further specifics in terms of the wording for these declining Red List species as current wording in the plan is brief and does not spell out in detail what Local Authorities can and should do. The existing nest sites of Red List Swifts and House Martins will typically be located in or on buildings; these should be retained and protected where possible, and mitigation provided when retention is not
- I broadly agree with the aims in principle but do not agree with giving more public access if this means providing recreational cycleways in wildlife areas. This is counter productive and has a negative effect due to wildlife disturbance. The devil is in the detail!
- Agree with the aims but there is no single aim more important ... they all need enacting!
- It would be great to increase of resident access to green space.
- Building-dependent birds are overlooked by the priorities - they are also overlooked by DEFRA net gain methodology, so it's important that they are clearly considered. The existing text relating to Swifts and House Martins is welcome but note that the existing nest sites of these species will typically be located in or on buildings - please amend the text to state this. In summary, please consider building-dependent wildlife such as red-

listed bird species which inhabit buildings in Greater Manchester. Therefore, please add: Swift bricks are a universal nest brick for small bird species and should be installed in new developments including extensions, in accordance with best practice guidance such as BS 42021 or CIEEM. Artificial nest cups for house martins may be proposed instead of swift bricks where recommended by an ecologist. Swift bricks are significantly more beneficial than external bird boxes as they are a permanent feature of the building, have zero maintenance requirements, are aesthetically integrated with the design of the building, and have better thermal regulation with future climate change in mind. Also please add: Existing nest sites for building-dependent species such as swifts and house martins should be protected, as these endangered red-listed species which are present but declining in Greater Manchester, return annually to traditional nest sites. Mitigation should be provided if these nest sites cannot be protected. In more detail for supporting evidence, the reason for this is that nest sites in buildings and bird boxes/bricks and other species features are excluded from the DEFRA Biodiversity Net Gain metric, so require their own clear policy. The Government's response in March 2023 to the 2022 BNG consultation stated that: We plan to keep species features, like bat and bird boxes, outside the scope of the biodiversity metric... [and] allow local planning authorities to consider what conditions in relation to those features may be appropriate (page 27, [https://consult.defra.gov.uk/defra-net-gain-consultation-team/technicalconsultation\\_biodiversitymetric/](https://consult.defra.gov.uk/defra-net-gain-consultation-team/technicalconsultation_biodiversitymetric/)). NPPF December 2024 Paragraph 187 (d) (page 54) states: "planning policies should... incorporate features which support priority or threatened species such as swifts". Swift bricks are the only type of bird box specifically mentioned as valuable to wildlife in national planning guidance, along with bat boxes and hedgehog highways (NPPG Natural Environment 2019 paragraph 023). The National Model Design Code Part 2 Guidance Notes (2021) also recommends bird bricks (Integrating Habitats section on page 25, and Creating Habitats section on page 26). Swift bricks are considered a universal nest brick suitable for a wide range of small bird species including swifts, house sparrows and starlings (e.g. see NHBC Foundation: Biodiversity in New Housing Developments (April 2021) Section 8.1 Nest sites for birds, page 42: [https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments\\_FINAL.pdf](https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments_FINAL.pdf) ). Therefore, swift bricks should be included in all developments following best-practice guidance (which is available in BS 42021:2022 and from CIEEM (<https://cieem.net/resource/the-swift-a-bird-you-need-to-help/>)). Many local authorities are including detailed swift brick requirements in their

plans, such as Tower Hamlets Local Plan Regulation 19 stage (paragraph 18.72, page 328 - <https://talk.towerhamlets.gov.uk/local-plan> ), which follows the exemplary swift brick guidance implemented by Brighton & Hove since 2020, and Wiltshire Local Plan Regulation 19 stage, which requires an enhanced number of 2 swift bricks per dwelling (policy 88: Biodiversity in the built environment, page 246 - "As a minimum, the following are required within new proposals: 1. integrate integral bird nest bricks (e.g., swift bricks) at a minimum of two per dwelling;"

<https://www.wiltshire.gov.uk/article/8048/Current-consultation-Reg-19> ), and Cotswold District Council are proposing three swift bricks per dwelling in their current Local Plan consultation (Policy EN8 item 6, and paragraph 0.8.4, <https://www.cotswold.gov.uk/planning-and-building/planning-policy/local-plan-update-and-supporting-information/> ), so such an enhanced level should also be considered.

- Save Ryebank Fields. It is achieving the aims and intent of your over complicated consultation. Actions better than words.
- You have excluded several protected species from your list. Inclusive of all UK Bat species, GCN and Badger!
- Increase public awareness and understanding of the importance of a healthy environment including water environment at a landscape scale. - For quality of life and city region resilience.
- The vision needs to be connected to the economy of the city region because no strategy on Nature can operate outside it. The vision and the aims need to recognise the importance of Nature to the economy as outlined in the government's 2019 report 'The Economics of Biodiversity: The Dasgupta Review' which concluded that "Our economies, livelihoods and well-being all depend on our most precious asset: Nature. We are part of Nature, not separate from it. We rely on Nature to provide us with food, water and shelter; regulate our climate and disease; maintain nutrient cycles and oxygen production; and provide us with spiritual fulfilment and opportunities for recreation and recuperation, which can enhance our health and well-being."
- I disagree with the way this question is worded. All the above are urgent. A very badly designed question
- To clarify, the Wildlife Trusts in the GM region largely support the vision, aims and targets of the GMLNRS but due to the constraints of the response questionnaire format, we have had to select disagree in order to submit a more detailed response. We are

keen to see the primary driver of the LNRS, Nature Recovery, strongly emphasised and not compromised in each part of the strategy in order to adequately address the declared Biodiversity Emergency. We suggest that the section on planning status might wish to emphasise public authorities' statutory Biodiversity Duty. We would prefer to see the Nature Network referred to as a Nature Recovery Network in order to reinforce this primary purpose of helping nature to recover. The survey showed the people of Greater Manchester believe nature has a value in itself and so we query why the Nature Recovery Network is described as having the joint equal purpose of providing recreation opportunities, as we don't think this is needed to make it more acceptable to people. We recommend replacing all references to the Nature Network with Nature Recovery Network and ensuring the core purpose of Nature Recovery is at the heart of, and reinforced, in every section. In addition, where the term nature should be used, sometimes this has been replaced by the much broader term "environment" (e.g. aim 3 should be managing and reducing the pressures on nature). In Section 4.1 on the vision, the use of "and, in time," in the first sentence does not impart the urgency of the Biodiversity Emergency declared by Greater Manchester. Can this be removed from the sentence? We support the 6 aims but do not feel they are equally represented throughout the strategy (there is less detail on aims 3, 4 and 6). Every single aim should result in a contribution to nature's recovery, without conflicting with other aims (for example it must be clear in the strategy how we ensure improving access does not conflict with reducing pressures on nature?). It should be acknowledged that the provision of eco-system services such as access to nature and open green spaces is a result of the creation, via the LNRS, of a fully functioning ecological network, not the purpose of it. Care is needed here to ensure the desired outcome of greenspace for people is suitably balanced with giving readers and users of the strategy a sense of the need for responsible use of this nature recovery network. There is an opportunity to signpost information on what nature recovery-compatible access and enjoyment look like (e.g. aligned with the countryside code principles such as dogs always on leads, leaving no trace etc). We endorse appropriate access to nature that does not conflict with nature's recovery. Managed correctly, access to nature can have a positive contribution to the protection and enhancement of the natural environment. In respect of the above, we recommend altering aim 5 to read "Improving local access to nature, in ways that support nature, and create more opportunities for people to enjoy nature responsibly, particularly in those areas with the greatest need." We also recommend

that, in line with paragraph 83 of the statutory guidance, the Access Principle reflects the need to remain mindful that access may not be compatible with nature recovery in every place, reading: "Ensure any access improvements do not place additional pressure on nature's recovery, are only undertaken where this does not compromise the conservation interests of sites and are undertaken on a case by case basis." Particularly if, as is stated at the start of the section, Principles MUST apply to ALL priorities and measures. It should be noted that currently the Principle on Access is a repetition of the access Aim – Aims and Principles should be distinct. We recommend re-examining the flow of the strategy's structure, ensuring it is clear how aims, priorities and measures address the pressures and issues and the State of Nature previously discussed. Targets need to clearly link to Aims as do Priorities and Measures – perhaps with some form of cross-referencing. We recommend strengthening the content around and emphasis on the less well-represented aims.

- Several of these aims are necessary and important
- Safeguarding wild life rich spaces like Ryebank Fields.
- All are vitally important and I'd encourage a tourist and developer tax to fund faster action. Developers also should ensure green spaces or restoration of local communities with every new development (thought I think we don't need any more high rises)
- Do not align with GMSF
- Creating more wildlife-rich resilient spaces, where they will expand and connect spaces for wildlife is equally important for restoring species abundance and distribution.
- I want please 1. the current greenspaces preserved 2. those greenspaces that are nor wildlife RICH made so and 3. for the existing greenspaces to be joined together with new green corridors.
- We would create habitats for wildlife in urban gardens, encouraging residents to value birds and hedgehogs. Swifts would benefit from swift nesting boxes but also Planning Departments asking developers for swift bricks on new buildings. These offer swifts much need stable and permanent breeding spots. Swifts are dependent on insects for food and gardens can be marvellous centres of insect life.
- In my opinion • This is closed ended survey---respondents being presented with a predefined set of answer choices rather than being able to provide open ended (and knowledgeable) responses..I expected this 'consultation' to follow the same formats (and carry the same weight) as with previous consultations I have responded to over the

years e.g. SLDP/GMSF/PfE... •This survey style does not in my opinion represent a Consultation it is restricted to such a degree that meaningful replies are denied...replies which could easily mean the difference between a successful LNRS and one doomed to fail due to the limited scope of the Q&A •I worry that in using such phrases in your document 'development must have regard to nature conservation' is missing the point of this LNRS entirely for we are not at the dithering stage of 'shall we shan't' we show some interest in possibly looking to consider nature as part of our future going forward...nature is TELLING US NOW THAT it is almost too late for it and therefore US to be saved...development is not going to save us only nature can do that...meaning it MUST be NATURE FIRST and foremost for LNRS to work! •I note that some of the authorities are picking and extracting areas they 'might wish to 'develop' in the future---missing the point that this document is supposed to be a NATURE RECOVERY Document that HAS to see the WHOLE of GM as ONE single entity that requires ONE SINGLE minded approach to saving the natural world and as a consequence ourselves.

•May I point out that a list of 57 species which was compiled by the Greater Manchester Bird Recording Group and submitted for the draft Nature Recovery Plan has been omitted from the 88 page LNRS document. This to me is a worrying omission for the 57 Species are the measure of whether the aimed for recovery of this plan has or has not worked. Surely the LNRS is a REAL plan for the REAL recovery of nature in GM and as such must make a true effort in attaining and sustaining this recovery and not simply finding the easiest targets too attain and then signing off the document---leaving the nature in GM in much the same parlous state it's in now. Please insert this list in full and then go all out to attain a real outcome for the LNRS.

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forward...nature is TELLING US NOW THAT it is almost too late for it and therefore US to be saved...development is not going to save us only nature can do that...meaning it MUST be NATURE FIRST and foremost for LNRS to work! •We note that some of the authorities are picking and extracting areas they ‘might wish to ‘develop’ in the future---missing the point that this document is supposed to be a NATURE RECOVERY Document that HAS to see the WHOLE of GM as ONE single entity that requires ONE SINGLE minded approach to saving the natural world and as a consequence ourselves. May we point out that a list of 57 species which was compiled by the Greater Manchester Bird Recording Group and submitted for the draft Nature Recovery Plan has been omitted from the 88 page LNRS document. This to us is a worrying omission for the 57 Species are the measure of whether the aimed for recovery of this plan has or has not worked. Surely the LNRS is a REAL plan for the REAL recovery of nature in GM and as such must make a true effort in attaining and sustaining this recovery and not simply finding the easiest targets to attain and then signing off the document---leaving the nature in GM in much the same parlous state it’s in now. Please insert this list in full and then go all out to attain a real outcome for the LNRS.

### 3. Are the vision and aims clear and easy to understand?

There were 374 responses to this part of the question.

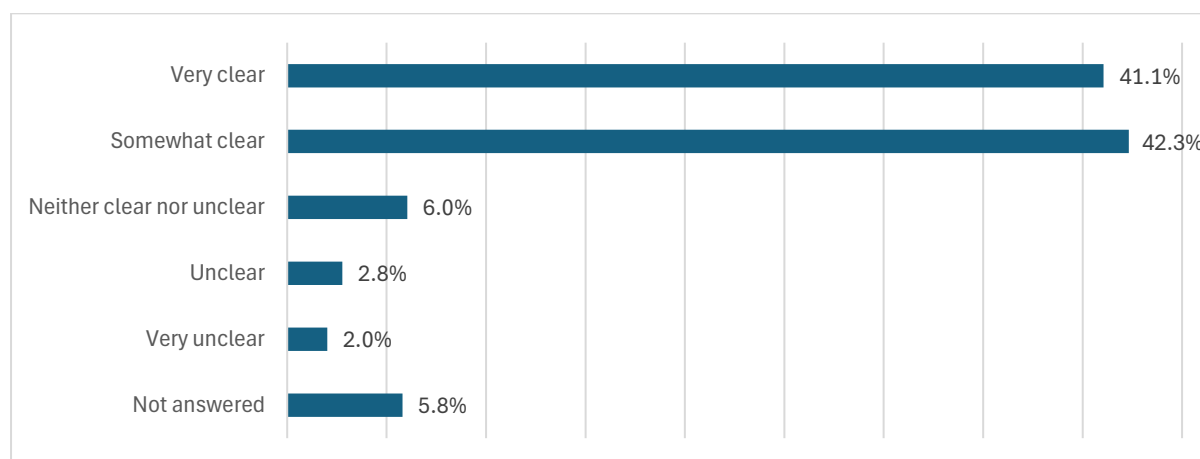


Figure 3 - Percentage of respondents that thought the vision and aims are clear and easy to understand.

Option	Total	Percentage
Very clear	163	41.1%
Somewhat clear	168	42.3%

<b>Neither clear nor unclear</b>	24	6.0%
<b>Unclear</b>	11	2.8%
<b>Very unclear</b>	8	2.0%
<b>Not answered</b>	23	5.8%

Table 3 – Number and percentage of respondents that thought the vision and aims are clear and easy to understand.

#### 4. Which of the LNRS targets do you consider the most urgent?

There were 369 responses to this part of the question.

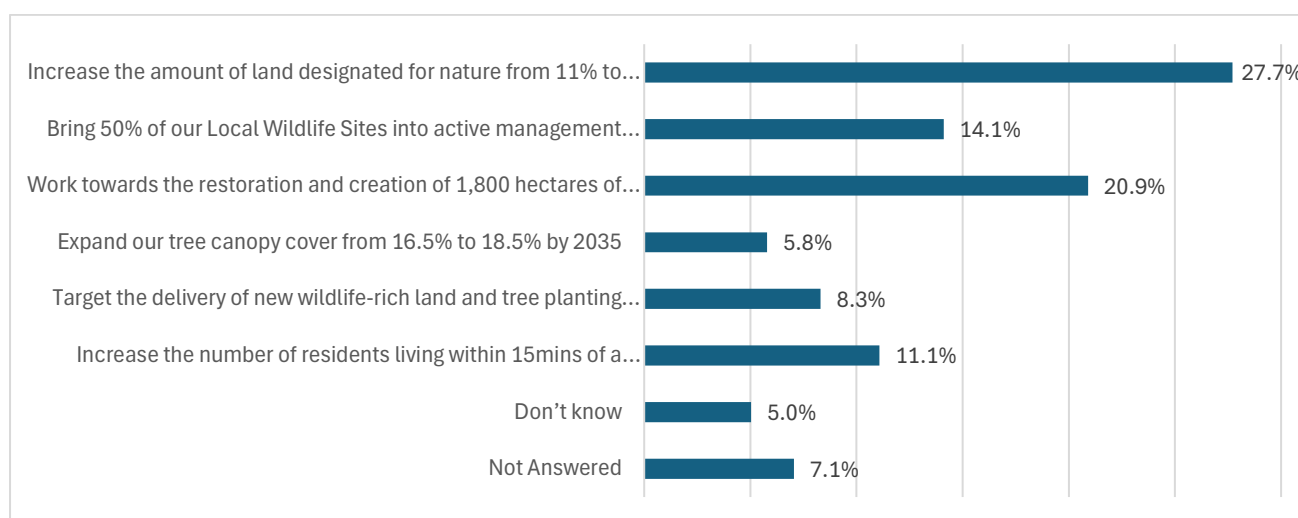


Figure 4 - Percentage of respondents that considered each of the targets to be most urgent.

Option	Total	Percentage
<b>Increase the amount of land designated for nature from 11% to 15% of the city-region by 2035</b>	110	27.7%
<b>Bring 50% of our Local Wildlife Sites into active management for nature conservation by 2035</b>	56	14.1%
<b>Work towards the restoration and creation of 1,800 hectares of wildlife-rich land by 2035</b>	83	20.9%
<b>Expand our tree canopy cover from 16.5% to 18.5% by 2035</b>	23	5.8%
<b>Target the delivery of new wildlife-rich land and tree planting within the Nature Network</b>	33	8.3%
<b>Increase the number of residents living within 15mins of a decent green space</b>	44	11.1%
<b>Don't know</b>	20	5.0%

<b>Not Answered</b>	28	7.1%
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Table 4 - Number and percentage of respondents that considered each of the targets to be most urgent.

## 5. Are these the right headline targets for GM?

There were 373 responses to this part of the question.

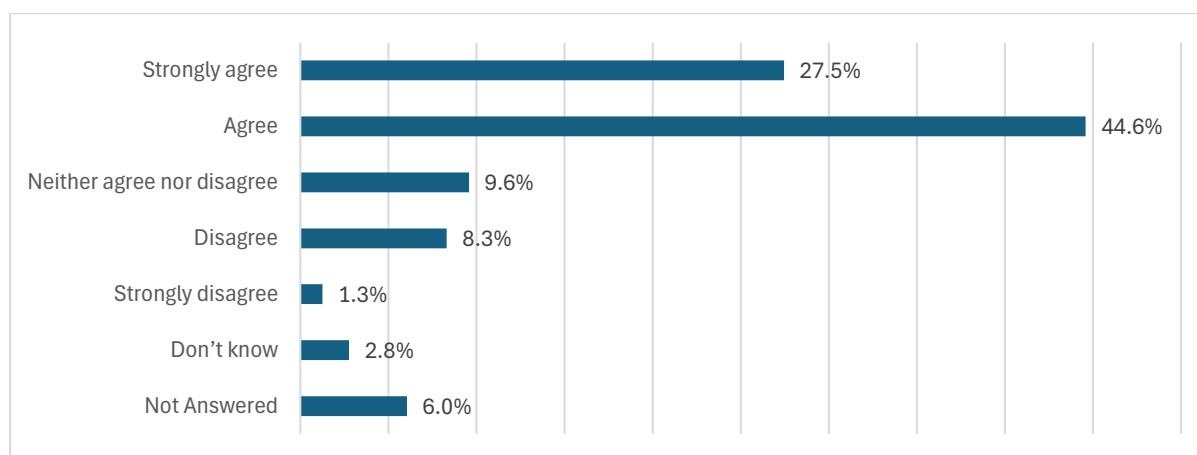


Figure 5- Percentage of respondents that agreed or disagreed with the targets.

Option	Total	Percentage
<b>Strongly agree</b>	109	27.5%
<b>Agree</b>	177	44.6%
<b>Neither agree nor disagree</b>	38	9.6%
<b>Disagree</b>	33	8.3%
<b>Strongly disagree</b>	5	1.3%
<b>Don't know</b>	11	2.7%
<b>Not Answered</b>	24	6.1%

Table 5 - Number and percentage of respondents that agreed or disagreed with the targets.

If you disagree or strongly disagree, please let us know what you would change and why?

There were 64 responses to this part of the question.

- Increase the amount of designated land by more than 2%, all local wildlife sites to be managed.
- I disagree about the need for tree planting - which has very little, or nothing, to do with conservation. In the past it has been a threat to our grasslands and there is an ever present threat, to our existing trees from the importation of tree diseases.

- There needs to be a balance between providing needed housing and saving green spaces. Building should be on brownfield.
- I would like to see a more ambitious target for tree canopy cover.
- There is still too much pressure on existing green space to be paved over for housing - Mirlees being a prime example of an amazing green space given over to development at the detriment of everything this agenda stands for.
- It is crucial to protect old trees and ancient woodland and to restore soils. Soil comes first in everything .
- not ambitious enough. Every building and infrastructure project needs to be positive for nature and wildlife
- GM needs better private transport links, we need roads to cater for the population, this is a higher priority in my view.
- Tree planting is important but pales into insignificance compared with preserving and enhancing (through re-wetting) our local mosslands, especially those which have undergone partial 'restoration'. These areas hold enormous volumes of CO2, developing on them will certainly release the CO2.
- Targets should be higher. A small 4% increase in designated land isn't a sufficient response to the emergency
- Why just one? Shouldn't they be cò-dependant
- Manchester to go plant based by 2030
- I think that we should be banning pesticides from GM. This is foundational to restoring populations of insects. There will have to be constraint of the car and car parking (public and private). a review of all 'brown' land, can this be saved for green.
- -Increasing land for nature from 11-15% by 20235 is not ambitious enough. - By doing B-F, you could achieve A, and most likely taking it past 15% by 20235. -

Increasing number of residents in 15 mins of a green space is not a SMART goal and is too hard to really define. For example, how big are the 'decent' green spaces; how can you access them, is the 15mins within walking distance, or by car? Are we going to create new green spaces? If so, how to decide where, when, and what? - There needs to be holistic approach to addressing wildlife concerns around new builds. If you are to meet F (the 15 mins within decent green space), is the plan just to build lots of high rise, new builds? If so, this is not very sustainable without lots of thinking beforehand. - D and E are great, but there needs to be a more thought-out plan.

Planting the right type of trees, at the right age, with the right biodiversity around them is key, just simply the amount of trees planted. Some trees absorb more particulates than others, which could be great for air quality in busy areas. But also, there needs to be proper amount of biodiversity to pollinate and reproduce not just in trees, but in grassy and swamp areas. - Other comments include: Manchester town centre needs a lot more green spaces and less traffic. Hopefully better public transportation system will help with this, but right now, the town centre lacks green spaces, and it is noticeable compared to other major UK cities. Maybe one way to do this is to start with the iconic piccadilly gardens, which right now is not a real green space. It could be turned into a really wonderful place for residents and workers in the city centre to experience a nice public green space. Another thing is to increase more of the options to explore the viaduct, which is a great thing.

- The phrase 'work towards the restoration' is not strong enough. It should be 'we will restore'. This whole recovery strategy is not worth the paper it is written on unless existing habitats are protected and restored.
- Hedgehog specific targets as they are in danger of extinction due to lack of access between residential areas eg hedgehog highways between gardens are desperately needed
- The land at common lane should be protected
- Targets related to housing are required.
- No jobs. Where is the job creation?
- All the targets are important. Increasing the designated land area to 15% is not much of an increase. However, the target is vague and it does not give a timeframe when this will be delivered by. How will this be audited and when so the public and relevant authorities will know when the target is achieved. Also, how will this be linked to habitat banks from Biodiversity Net Gain? How will funding be delivered to the opportunity areas.
- It's not obvious which is larger out of 4% of city region and 1800 hectares
- The targets should be more ambitious. Designating more land for nature does not necessarily require more resources from GMCA.
- We agree that the headlines are right, but think they could be more ambitious. We believe in many instances nature can look after itself but we feel strongly that having someone 'take care' of a space, in the most appropriate way is a top priority.

- Extremely Manchester City orientated
- 15 mins by walking, cycling wheeling or public transport
- Stop house building on land previously designated green belt
- Targets are fine - but like the NHS targets = impossible to deliver unless the root cause of the reasons for the reduction in these spaces is addressed - largely housebuilding on greenbelt land.
- as a large group we had difficulty selecting a strategy as we agree with all aims but as Bolton is heavily populated getting good maintenance and enlarging our available green space was chosen though we want serious budgets for improvement and restoration
- Do any of these targets correlate with planned development in other sectors and the net carbon impact across the region as a whole? Protecting small pockets of urban greenery is only beneficial if the city as a whole becomes a lower polluting/emitting area
- The tree cover target is not very ambitious
- There is no mention of plant biodiversity, and our modern parks are virtually a monoculture, lacking plant diversity and thoughtful management.
- The targets should be much more ambitious
- We agree with the headline targets but believe there should be an additional one which is: to improve the condition of canals for the provision of sustainable transport and improved access to wildlife. This would include improving the status of sections of the canal that SBIs to 'Good', thus improving biodiversity. The intention stated on the opportunity map to soften canal banks would be adverse to the aim to enable access via navigation/mooring and result in an heritage deficit.
- Too little over too long a time frame.
- Much more wildlife-rich land required to genuinely restore nature in Greater Manchester especially at its centre at the confluence of its canals & rivers.
- I selected 'agree'. However (I am as far as page 44 in the draft document) I feel more emphasis on Identifying, Protecting and Enhancing more as-of-yet undesignated urban centered sites (not just existing core sites) for designated nature reserves is also a priority.
- The aims are poorly worded as doesn't define what kinds of green spaces – it would be possible to achieve that by building a tower block full of people next to a bowling green, or on half of a nature space like Ryebank Fields. The aims should mention biodiversity of

green spaces, not just whether they are green or not. We have a need to access natural green spaces with wildlife, not just grass.

- poorly worded as doesn't define what kinds of green spaces – it would be possible to achieve that by building a tower block full of people next to a bowling green, or on half of a nature space like Ryebank Fields. Free text box could be used to talk about \*biodiversity value\* of green spaces and need to access natural and semi-natural green spaces
- All of the above are urgent.
- Weird decision to separate out/highlight tree planting/cover over other habitat efforts - nowhere near the most effective approach for either biodiversity or carbon capture. Political / economic prioritisations perhaps involved.
- The targets are too low. We need ambitious targets.
- These are sneak aims! Again, the devil is in the detail. I suspect that the aim to increase the number of residents living within 15mins of a decent green space allows for the encroachment of new housing adjacent to wildlife areas. This is supposed to be a strategy to help wildlife (which is desperately needed to halt the species collapse) and should not be a strategy to give unlimited access to the public. Unfortunately, the 2 aims are incompatible.
- Some of the terms in these targets need to be defined more clearly. "Decent green space" is particularly vague and does not specify "wildlife-rich" as in other examples. There is a big difference between an area with thriving and diverse wildlife with habitats to support this and a "green space" consisting of grass and a few bushes and trees. It is easy to envisage a situation where very loosely defined targets are able to be met but in fact the result for local nature conservation and access to nature across Greater Manchester is almost as uneven and as it is at present
- Nowhere near ambitious enough, only a few percent increase, should be from 11% to 30% (at least) for example
- Yes, but this probably seems a bit abstract to people. And how to ensure privately owned woodlands, for example, is protected from fringe developments in all this?
- as so much of our green space is earmarked for development, a priority should be that all new builds need to prioritise nature and the climate, to not only be energy efficient but to use native plantings and avoid invasive plants in their soft landscaping. eg mixed native hedges and no laurel (which seems to be the hedging plant of choice in all new

house developments, to the detriment of wildlife on site and neighbouring areas as it spreads.

- They are not high enough targets, we are one of the most nature depleted countries in the world. These targets are disappointing to me.
- definitions are not clear enough. its all poorly worded as doesn't define what kinds of green spaces – it would be possible to achieve that by building a tower block full of people next to a bowling green, or on half of a nature space like Ryebank Fields.
- Mostly agree - but would be nice to have a target focused on engagement and getting people connected with nature so they are inspired to protect and restore it e.g. working with schools
- Agree overall, but in addition: I appreciate that these are headlines, but would like to see “water environment” specified as well as “land” which is already included. This is especially important considering the impact that flooding/low rainfall has on the resilience of GM; setting targets to improve the overall water environment at a landscape scale across GM in targeted areas will have net benefit on water quality and ecology too, as well as flood/drought resilience. I look forward to seeing more detail on this in the broader supporting documents in 2025, ideally against specific actions/relevant partners at priority locations.
- See above, very badly designed. All targets are urgent
- As with the Aims, we have been obliged to select Disagree in order to provide feedback. We would like to reiterate the Wildlife Trust's overall support of the principles and ethos of the LNRS. The targets are somewhat muddled at present. Ideally, there would be targets for all of the aims, even if they were qualitative rather than quantitative in order to demonstrate the equal importance of the aims. Currently only 3 of the aims have targets for them (although 2 of these aims have 2 targets each) and of the 5 targets, two specifically address just one broad habitat type (Urban and Suburban Greenspace (and specifically the issue identified in 3.1.3) and Woodlands). We recommend more equal representation of all Aims and Habitat Types (and potentially also species) in the Targets where possible. We suggest a target of 1 in 4 people taking action for nature could be adopted for Aim 4. With regard to specific targets, we note that the UK has committed to protecting 30% of land and sea for nature by 2030 and challenge whether “Increase the amount of land designated for nature from 11% to 15% of the city-region by 2035” is ambitious enough. We would also prefer that the term city-region is replaced

with Greater Manchester to avoid any doubt of the geography this aim applies to. For the target “Bring 50% of our Local Wildlife Sites into active management for nature conservation by 2035” it would be useful to understand the baseline in order to identify where effort would be needed. This target would also benefit from an explanation of what is meant by active management. In order to judge whether the target “Work towards the restoration and creation of 1,800 hectares of wildlife-rich land by 2035” is ambitious enough it needs explanation of what it includes and what assumptions are made, e.g. does this include or exclude the protected sites in target 1? Does it include sites where there is already active restoration/creation? Does it include the tree-target land? 1800 ha is 1.4% of GM land area. Assuming they are all distinct geographies, achievement of this target along with target 1 and the 2% additional tree cover, these three targets would deliver 18.4% of GM land for nature. Again, this is considerably lower than the 30% by 2030 target we are aiming for. How much of the mapped Nature Recovery Network would this constitute? Also, can “Work towards” be removed so it is simply “Restore and create an additional 1800 hectares of wildlife-rich land by 2035.”? We recommend considering including a numeric aim in “Target the delivery of new wildlife-rich land and tree planting within the Nature Network” and re-wording it more clearly to become “100% of delivery of the above targets will be enacted within the identified GM Nature Recovery Network.” The wording of the target to “Increase the number of residents living within 15mins of a decent green space” is ambiguous in how this might drive achievement, for example – the target could be achieved by increasing population density through more housing development around existing green spaces. We suggest re-wording it to read “Enable more residents to have readily available access to good quality open green spaces.” We would query whether this needs to specify if it is targeted at only urban and suburban green spaces (following on from the section of the strategy it originates from) or if this ambition applies to ALL parts of GM. We also re-iterate the point about ensuring every part of the strategy works primarily to support nature recovery and we ask for it be made clear how this target drives nature recovery.

- "Increase the number of residents living within 15mins of a decent green space" should specify NATURE SPACE as green spaces can be nature deserts
- I do, mostly, agree with headline targets, however, with regard to tree canopy I do not. The priority isn't about expanding tree canopy cover, although that would be good too It

is about safeguarding the tree canopy we have. We need to safeguard our mature trees on all land, private, highways, greenspace and have really robust reasoning for removal of any via TPO's, strong policies by authorities and planning expectations for developers. Tree networks/old trees are vital to nature recovery.

- We urgently need all of these targets delivered on and 2035 is too late.
- Feel they should be more ambitious - aiming for greater proportion of land designated for nature & a greater tree canopy cover
- Please consider increasing the tree canopy target, 2% increase over 10 years isn't enough, there are so many trees being felled at the moment even ones I am aware of that have had TPOs imposed on them yet builders have deliberately felled them anyway, and covering the land with plastic grass, tarmac, paving etc. and people are then complaining when their properties flood!! Trees soak up water!!!
- Need to protect existing green belt where ecological reports clearly show important natural resources and species
- The targets to bring 50% of our Local Wildlife Sites into active management for nature conservation by 2035 and work towards the restoration and creation of 1,800 hectares of wildlife-rich land by 2035 are equally important. The expansion of tree canopy cover needs to avoid habitats which are important for ground nesting birds including waders and skylarks. There should be a buffer zone of 0.70km between these areas and any tree planting.
- Options are hard to compare because of mixed units. Some options are in hectares, while some are in percentages.
- Our survival depends on preserving green spaces
- Encourage residents to bring nature into their gardens - ponds, birdboxes, compost heaps. Make a target for a certain number of ponds in each suburb.
- In my understanding the aim of the LNRS is to bring about the recovery of nature in Greater Manchester...according to the empirical evidence I have gathered and submitted to the REDACTED plus such as the REDACTED with my decades of Wildlife Recording mostly on REDACTED our wildlife is in freefall...for example The spring and early summer of 2024 had the least insects I have EVER noted on my daily wanderings recording wildlife a worrying occurrence that ramped up the recorded year on year decline in insects many Wildlife observers have noted in GM (and rest of UK)...the most obvious example of this is the year on year decline in that most 'once' common insect

the Butterfly. It is glaringly obvious that there is a major problem with our wildlife caused by mankind's neglect of it...YET I might not despair if YOU GM apply without exception the 88 page documents aims in prioritising Nature FIRST---otherwise I'm afraid in not too many years the only thing to eat will be the documents produced saying how imperative it is to save the natural world (but which were ignored). Therefore I ask why are you offering only one of the above as a target for considering which is most urgent in GM when in truth they all must be pursued with the utmost urgency if this LNRS is to 're-wild' GM.

- It is our understanding the aim of the LNRS is to bring about the recovery of nature in Greater Manchester...according to the empirical evidence REDACTED has gathered and submitted to the REDACTED plus such as the REDACTED with my decades of Wildlife Recording mostly on REDACTED our wildlife is in freefall...for example The spring and early summer of 2024 had the least insects I have EVER noted on my daily wanderings recording wildlife a worrying occurrence that ramped up the recorded year on year decline in insects many Wildlife observers have noted in GM (and rest of UK)...the most obvious example of this is the year on year decline in that most 'once' common insect the Butterfly. It is glaringly obvious that there is a major problem with our wildlife caused by mankind's neglect of it...YET I might not despair if YOU GM apply without exception the 88 page documents aims in prioritising Nature FIRST---otherwise I'm afraid in not too many years the only thing to eat will be the documents produced saying how imperative it is to save the natural world (but which were ignored). Therefore we ask why are you offering only one of the above as a target for considering which is most urgent in GM when in truth they all must be pursued with the utmost urgency if this LNRS is to 're-wild' GM.

**6. We are interested in improving our target for access to green space – which of the following do you prefer?**

There were 365 responses to this part of the question.

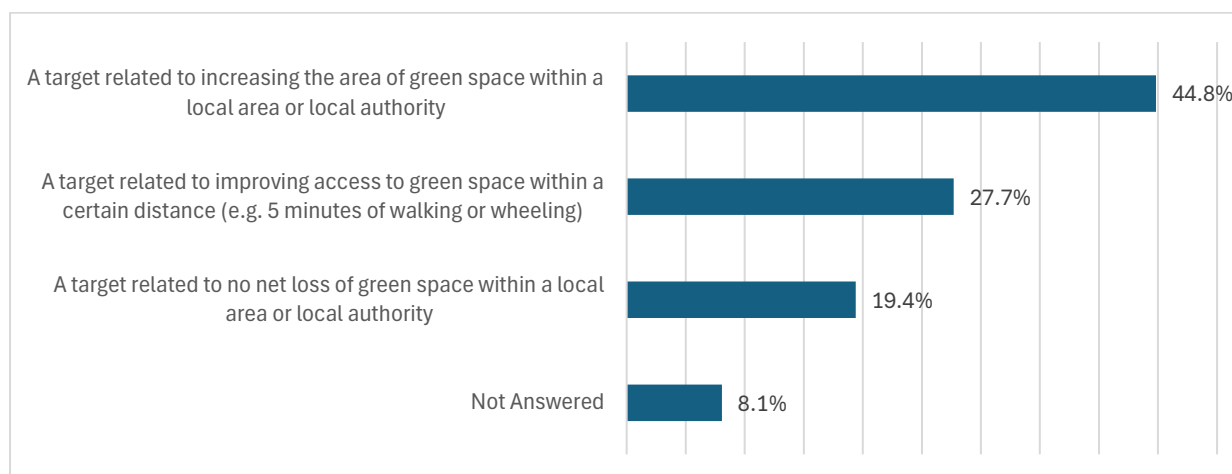


Figure 6 - Percentage of respondents that preferred each of the targets for access to green space.

Option	Total	Percentage
<b>A target related to increasing the area of green space within a local area or local authority</b>	178	44.8%
<b>A target related to improving access to green space within a certain distance (e.g. 5 minutes of walking or wheeling)</b>	110	27.7%
<b>A target related to no net loss of green space within a local area or local authority</b>	77	19.4%
<b>Not Answered</b>	32	8.1%

Table 6 - Number and percentage of respondents that preferred each of the targets for access to green space.

# Priorities and Actions

## 7. Are these the right priorities for woodlands, trees, hedgerows and scrub habitat in Greater Manchester?

There were 367 responses to this part of the question.

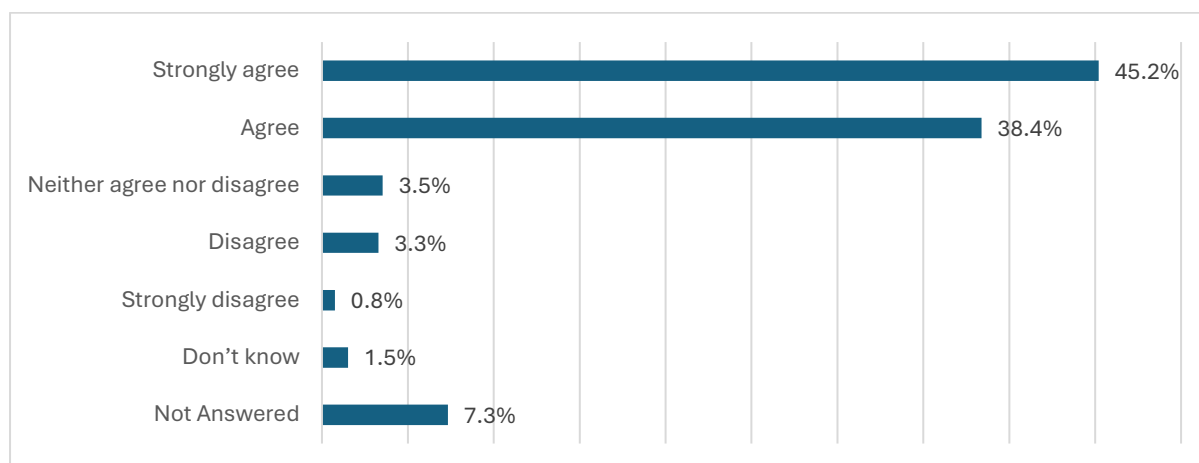


Figure 7 - Percentage of respondents that agreed or disagreed with the woodlands, trees, hedgerows and scrub priorities.

Option	Total	Percentage
Strongly agree	179	45.2%
Agree	152	38.4%
Neither agree nor disagree	14	3.5%
Disagree	13	3.3%
Strongly disagree	3	0.8%
Don't know	6	1.5%
Not Answered	29	7.3%

Table 7- Number and percentage of respondents that agreed or disagreed with the woodlands, trees, hedgerows and scrub priorities.

If you disagree or strongly disagree, what do you think is missing and why?

There were 38 responses to this part of the question.

- There needs to be investment in the management of such spaces. I see so many of these spaces just becoming overgrown, derelict, and not a nice place to go. Too many times we get funds to creat a space, but then it is not managed.or.looked after

- I don't agree with planting street trees as these tend to grow too big, cause havoc with their root system and uproot pavements causing accidents and blocking pavements.
- Where is the priority for creating pathways to employment in this sector opening up opportunities for people who wouldn't necessarily think of working in this area.
- The requirement for all L A to actively place woodland protection orders on existing trees and woodland. REDACTED but the department have been dismissive stating its not needed as they own the land. We have a local developer who has attempted to get planning got the land adjacent. Plans are for 1,000 dwellings. Its an area called Ditchers Farm and this was one of the areas removed from application process to upgrade to green belt in the 'place for people plan. 'Removed at Gov level, it's imperative to protect the now ancient trees. Representation has been made via the local elected Councillors, but we are hitting a wall with the department within Bolton LA.
- Wigan and the surrounding area are ripping up hedgerows and cutting down trees, over development has left Wigan gridlocked and areas devoid of nature, many recreational areas built on and fields which wildlife was established and thriving destroyed and its still happening, the priority should be now, stop now, its already too late for Wigan, ponds and fields have disappeared and the town has doubled in size over the past 20 years, you cannot get that space and wildlife back
- Concentration should be on native species
- Not sure if I agree with "More varied trees, scrub, parkland and woodland habitats incorporated into our farmlands and more productive woodlands delivering nature recovery". Aren't farmlands busy enough with crop growing and animal rearing? Do they have the additional unused space for providing this without hurting their own needs?
- Judging from increase in climate change, we need loads more tree canopies to stop heat island effect.
- Nothing missing but by planting trees on Urban streets will lead to long term issues with tree routes on footpaths, roads & properties
- In the woodlands, trees, scrub and hedgerows section, the Woodland Trust would be keen to see some recognition of the need for more trees on new developments, especially as we look to build more homes and infrastructure. As such there should be a priority for 'More existing and new trees on housing developments, either through retaining more existing trees or by planting new ones'. The Woodland Trust recommends a minimum 30% tree canopy cover target for development areas to

support nature recovery and increase access to nature, although this can be revised up or down depending on local opportunities and constraints.

- No jobs, no jobs for forestry, arborists, wildflower restoration, NO ACTUAL JOBS
- For urban street trees - there will need to be better street cleaning to cope with the mess trees make - flowers, sap, leaves falling.
- These targets are important of course. However, there needs to be specific targets otherwise it will be impossible to know whether they have been achieved. What timescales etc. Community groups and conservationists with expertise need to be consulted in any new habitat creation / modification to determine whether there are existing species or habitats which may be negatively impacted e.g. planting trees on breeding wader habitat.
- We believe protecting existing sites, valuing established areas of biodiversity and connecting them to support wildlife are the priorities. As an organisation we have been working hard to maintain these spaces in the Heaton but have found this to often be at odds with councils activities. We think it is possible to protect these spaces whilst also being inclusive of cyclers, walkers and people using the space and hope to see more balanced approaches in the area in future.
- A focus on increasing canopy percentage and prioritising native species is good, I have no issue with the suggested priorities, what I think is missing is a specific plan for dead trees, especially those effected by ash die back. A plan needs to be made that not only attempts to deal with the spread of ash die back and the health and safety associated with a dead trees large limbs, but also one that recognises standing dead wood. Standing dead wood is a vital habitat feature that is currently lacking in our environments and one that serves as a space for a huge variety of species, species that are currently in decline. Standing dead wood should be held in the same regard as log piles as important interventions for biodiversity.
- There is a move to tree planting but we agree not at the loss of meadows and mosses
- As there is no where else in the consultation for free comment I will make one here. Producing this strategy now, whilst appreciating it is part of a national process, is like rubbing salt in the wound that is Places For Everyone, which promotes building on green belt, having made a number of allocations for green belt status to be taken away from many areas across Greater Manchester. In addition Tameside MBC has given outline planning permission to building 2500 houses on greenbelt land- so infilling in

beautiful and biodiverse countryside and woodlands, including SSSI and joining the conurbations of Godley, Gee Cross, Hattersley and Hyde. So there is ongoing destruction of nature which needs stopping now, as a priority. Whilst the aims of the GM strategy are very laudable, you need to see the reality in front of you now, rather than in effect shutting the door after the horse has bolted. Please focus your talents, expertise and energy in stopping the planned destruction of nature by REDACTED. If you look in the planning documents for Godley Green the applicant ie TMBC acknowledges the negative impact on the environment, biodiversity and visual amenities there- yes still they go ahead.

- protecting existing sites, valuing established areas of biodiversity and connecting them to support wildlife are the priorities. As an organisation we have been working hard to maintain these spaces in the Heatons but have found this to often be at odds with councils activities. We think it is possible to protect these spaces whilst also being inclusive of cyclers, walkers and people using the space and hope to see more balanced approaches in the area in future.
- We agree with the priorities but the lack of space to add comments to explore our opinion is an oversight. Therefore please consider the following. We note that the status of woodlands in the LNRS area is challenging, with many in poor condition and a higher-than-average proportion unmanaged. Management for shooting, especially game shooting and deer management, results in landscapes with more woodland extent and improved structure compared with land not used for shooting. This is a finding consistent in studies from the 1980s to the present day. BASC's woodland management advice pack to members is aligned with Forest Research's woodland ecological condition criteria, to maximise the effort people who shoot spend on woodland management to improve ecological condition of woodlands as a whole. The benefits shooting provides woodlands also extend to hedgerows, with there being more hedgerow length and more sympathetic management practices for nature on land managed for shooting. Therefore, sustainable shooting, following best practice, is an important ally to the LNRS aspirations and an example of a wildlife friendly farm diversification opportunity. What surprised us was that deer and grey squirrel damage were not specifically mentioned as action areas. Our experience of the other LNRS consultations to date is that these are specifically mentioned in the high-level strategy and the underlying action plans. The assessment and management of deer and grey

squirrel are essential for woodland health and the success of new plantings and natural regeneration. We are expecting governments strategies for deer and grey squirrel soon which will complement the existing public funding for their management through the Environmental Land Management Scheme. We recommend a specific mention is added to the plan to show recognition for management of these species.

- I would insert some detail qualifying the term 'Well Managed Woodlands, trees, scrub and hedgerow' somewhere in the strategy. We've all seen how quick landowners and parks are at removing fallen trees for example. Fallen trees are an important aspect of wildlife habitat. I would also add 'gated urban wildlife areas (reserves)' to the list. i.e. Giving wildlife the optimum chance to recover while allowing limited human access via community groups (key holders).
- We need to save Ryebank Fields from any development - it is an important mix of semi-natural grassland and woodlands, trees, hedge and scrub.
- Priority is relative to local context - to choose one is simplistic, but if I must - - -
- Also think we need greater access and development of community farms, where people can connect and learn about nature and farming
- Yes ... and absolutely no point promising to plant new trees etc if current ones have no management plan or are at risk from development.
- Retention of ancient woodland and functional woodland habitat.
- Priorities are right, but needs some measure of control for tree planting in appropriate places and not at the expense of other habitat.
- Need to protect existing woodland & scrubland. Inc that within Ruebank fields
- Again, due to the limitations of the consultation response questionnaire, we have been obliged to select Disagree in order to provide feedback and general responses about priorities. Again, this does not imply any lack of support from the Wildlife Trusts for the LNRS. This can be taken to be the case for all future sections of our response where we have been obliged to state "disagree". The following comments relate to Woodlands etc but also ALL broad habitat types. We refer to our previous comments regarding improving flow of the document and cross-referencing to ensure readers can clearly see that priorities address the identified challenges and causes of the current State of Nature. A discussion of the causes of the state of designated sites, species, urban greenspace and habitat types would have made it clear why the vision, aims and targets are the right ones and would lead to being able to structure the priorities and measures

according to the aims, check they follow and address causes of issues and make it clear which is most important. The habitat themes in section 6 have inconsistent structures/content and it's hard to relate them back to the aims of - Enhance and protect - Create and connect - Build resilience - Act together - Improve access - Engage and value. The public survey identified support from 15% of respondents for protection of some kind for wild spaces and 13% of organisations stated that 'further protection' of nature in GM is needed; this was in fact the second most common action suggested. The strategy needs to find a way to address this clear desire from the public if possible. 10% of landowners and managers responding to the public survey stated that tackling invasives was an action they would like to see in the strategy. This was the joint second most popular answer. Yet, reference to INNS is sparse in the public-facing priorities and measure (although we appreciate it is included in the Technical Appendix). Specific Woodland comments: No mention of INNS despite being one of the biggest threats to woodlands. We recommend including the following phrase into priority 5: More varied trees, scrub, parkland and woodland habitats incorporated into our farmlands, as appropriate, and more productive woodlands delivering nature recovery.

- Comment: Would like to see a measure under safeguarding priority for restoration of 'plantation ancient woodland sites' (PAWS). Comment: Priority bigger and better-connected, measure 3 'Encourage the planting of trees...' this should say 'Encourage the establishment of...' as planting is not always appropriate or needed, other options are available including natural regeneration, assisted colonisation etc.
- Need to replace fences with hedges
- Natural regeneration /rewilding likely to create longer term resilience to climate change
- I do, mostly, agree with these priorities, however, priority should be given to safeguarding our street trees that are under threat because they are categorised as causing problems to infrastructure such as lifting tarmac or pushing kerbs. The time is now to say that our mature trees are more important than a path or wall. New tree provision is in many policies for many reasons but even if they don't die from lack of water, car compaction, vandalism they do not offer the biodiversity or climate resilience of older trees.
- All priorities are important
- GMSF does not align with the protection of existing green belt including woodland

- There needs to be consideration of woodland management. Only 7% of our woodland is managed sustainably according to the Forestry Commission, it is no good spending money planting new woodland etc if it is not managed properly.
- Using urban buildings for swift boxes and other bird homes. Planning departments to follow swift friendly policies.
- I agree with all points Yet I cannot agree that there is only one choice you then offer as most urgent...we have let wildlife and its home (Habitat) become so degraded that ALL need to be Prioritised...that in my opinion is what the recovery of our natural world has to have without delay.
- We cannot be restricted to one priority as this is meaningless. Fragmentation is destruction as far as wildlife and habitats are concerned. We have let wildlife and its home become so degraded and fragmented that ALL need to be prioritised. In our opinion the whole plan not fragments is required if wildlife is to have a chance and by definition enable the sustainable welfare of mankind.

## 8. Which of the woodlands, trees, hedgerows and scrub habitat priorities do you think is the most urgent?

There were 359 responses to this part of the question.

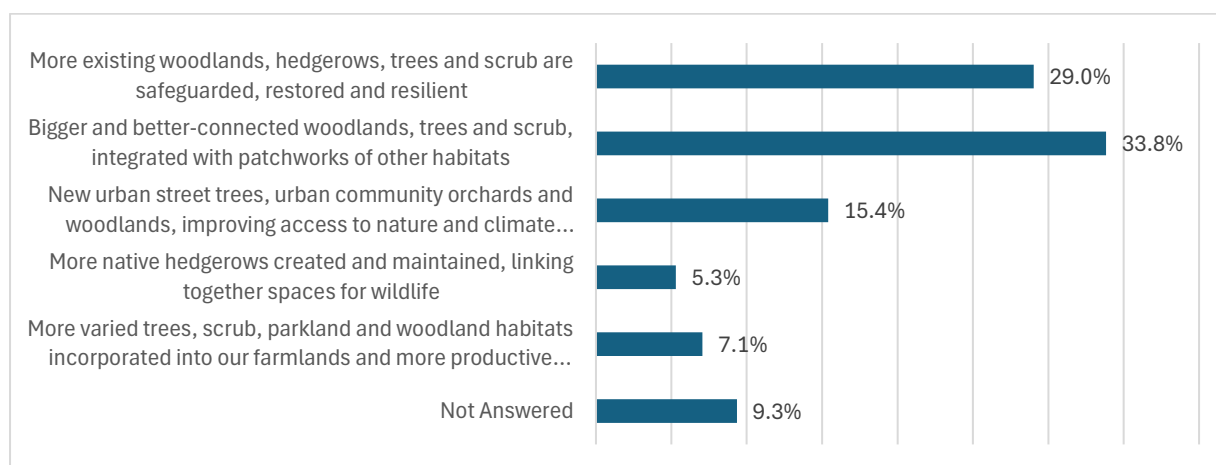


Figure 8 - Percentage of respondents that considered each of the woodlands, trees, hedgerows and scrub priorities to be the most urgent.

Option	Total	Percent
More existing woodlands, hedgerows, trees and scrub are safeguarded, restored and resilient	115	29.0%

<b>Bigger and better-connected woodlands, trees and scrub, integrated with patchworks of other habitats</b>	134	33.8%
<b>New urban street trees, urban community orchards and woodlands, improving access to nature and climate adaptation</b>	61	15.4%
<b>More native hedgerows created and maintained, linking together spaces for wildlife</b>	21	5.3%
<b>More varied trees, scrub, parkland and woodland habitats incorporated into our farmlands and more productive woodlands delivering nature recovery.</b>	28	7.1%
<b>Not Answered</b>	37	9.3%

Table 8 - Number and percentage of respondents that considered each of the woodlands, trees, hedgerows and scrub priorities most urgent.

## 9. Are these the right priorities for grasslands, farmland and lowland heath habitats in Greater Manchester?

There were 363 responses to this part of the question.

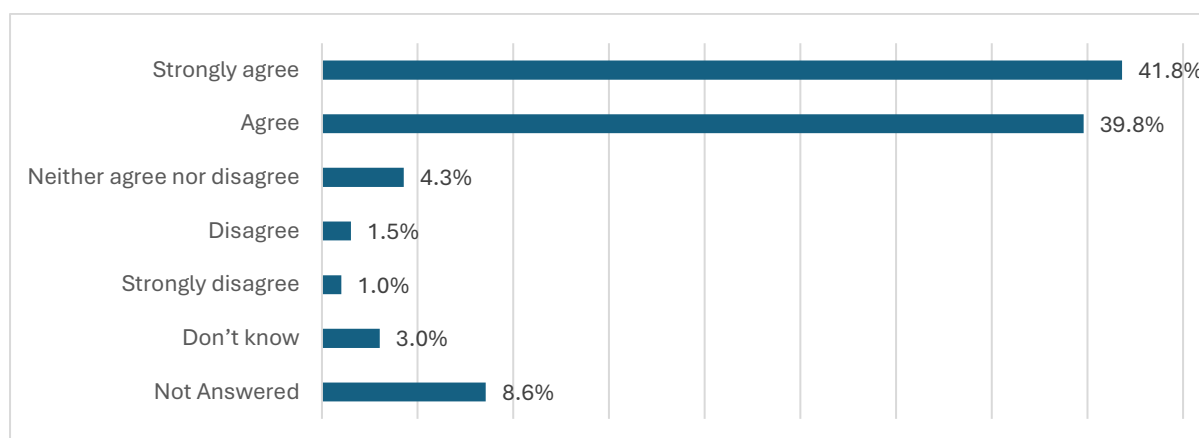


Figure 9 - Percentage of respondents that agreed or disagreed with the grasslands, farmland and lowland heath priorities.

Option	Total	Percentage
<b>Strongly agree</b>	166	41.8%
<b>Agree</b>	158	39.8%
<b>Neither agree nor disagree</b>	17	4.3%
<b>Disagree</b>	6	1.5%

<b>Strongly disagree</b>	4	1.0%
<b>Don't know</b>	12	3.0%
<b>Not Answered</b>	34	8.6%

Table 9- Number and percentage of respondents that agreed or disagreed with the grasslands, farmland and lowland heath priorities.

If you disagree or strongly disagree, what do you think is missing and why?

There were 28 responses to this part of the question.

- I too many times just see these spaces go to rack and ruin. They need to be properly managed on an ongoing basis
- How are you going to join up green areas when they have been built on? Green areas are used for concerts and fireworks where does the wildlife go when we invade their spaces, I just don't get how an owl or kestrels can come back when all there is development after development, find out how many houses and industrial areas have been built in Wigan in the 15 years, instead of using industrial units which have been left derelict they build new ones, instead of using rooves to put solar panels on, they put them fields, there is hardly anything left, how can you reintroduce wildlife, when it needs space to hunt and feed to nest and to roam. You can't conjure up space where there is none, it's been built on.
- Farming in the county should not be interfered with, it already works so leave it alone!
- No Jobs, no jobs to monitor how any of these actions will help. WHERE ARE THE ACTUAL JOBS
- Existing areas of importance need to be safeguarded by legislation and planning policy ie designated sites. Connecting sites of importance is the next step but there needs effort to ensure all sites are safeguarded from development for example. All are important but as per previous comments, there needs to be a specific target ie timescales, areas etc. How will farmland be improved and linked with other schemes such as ELMS etc to improve biodiversity
- Our view is that an important enabler for improving habitats in our local area is having access to ecologists and other experts working with or on behalf of the council to provide guidance and aid in decision making within the local authority.
- These are the areas targeted by house builders - with planning (mostly) being granted DESPITE the impact (even taking into account the targets) to the habitat because

councils have to meet housing targets. You can't have conflicting targets - they simply don't work. Saying that planning will take into account this policy is really "utter" rubbish - they will meet housing targets THEN they will meet the biodiversity targets (or not as will be the case). If you said - all of the above MUST be (demonstrated) prioritised BEFORE house building then I may agree.

- we agreed with all these, where local provision isn't possible there should be excellent bus services to green spaces
- view is that an important enabler for improving habitats in our local area is having access to ecologists and other experts working with or on behalf of the council to provide guidance and aid in decision making within the local authority.
- We agree with the priorities but the lack of space to add comments to explore our opinion is an oversight. These are core habitats influenced by management for shooting. Longstanding and recent reports show that when a farm has shooting there are substantially more hedgerows, field margins and cover crops. This aligns closely with the specific action 'Grow and maintain multi-species cover crops, and cut later in the year, to provide food and cover for wildlife'. The actions set across the priorities under this group will be welcomed by the shooting community – they will support brown hare and grey partridge which are in themselves conservation priorities. Therefore, when considering delivery, those with a shooting interest are an important sector to engage with. Therefore please consider the following.
  - Ryebank Fields in Chorlton need to be preserved
  - Again, all are of equal importance to their locality (mine being urban grasslands and meadows).
  - Grassland species have particularly declined in GM, especially in more suburban locations where knowledgeable management has been lost through cuts. Huge opportunities here for restoration, biodiversity, carbon capture and public engagement, but BNG won't do it - too much effort and too long to achieve enough uplift. Requires Local Authority management with genuine expertise, not unskilled & uncaring 'Grounds maintenance' contractors.
- Some general feedback - it would be useful to match the definitions for habitats (particularly 'species-rich grassland') to the UKHab definitions, as will streamline the use of the LNRS for BNG purposes

- When referring to road, cycle and pedestrian verges, please refer to Public Rights of Way and the National Trails within the Greater Manchester Area - Pennine Bridleway (53km within GM) and Pennine Way (13km within GM)
- Need to also make it illegal for farmers to cut long grass in ground nesting bird season to protect the birds, please please please
- All of these need undertaking!
- We need protection for all existing urban green spaces
- Protect; promote the existing lowlands, meadows
- Whilst largely agreeing with the priorities and actions (nb please either call them measures or actions throughout the strategy not both), we would note that species rich grasslands are probably the one of the least extensive habitats within Greater Manchester and in many cases are fragmented and isolated to a greater extent than woodlands and rivers. To re-establish a robust grassland ecological network it might be necessary to lower the threshold for inclusion within the mapped nature recovery network and input sites that are currently outside of the areas identified by the mapping software, which is based on a path of least resistance. It might be prudent to include all grasslands that hold some species diversity whether identified by the software or not. Targeted control of invasive species should also be mentioned here as a specific measure, particularly in relation to urban meadows and the restoration of species-rich/ semi-natural grassland.
- Comment: Priority on dedicated spaces for wildlife, measure re dedicated unmanaged or uncropped areas; in most cases they do need some management, whether cutting, topping, grazing, weed control etc. so needs to refer to this by perhaps 'lightly managed' or 'sympathetically managed'. Typo in biodiverse farming measure, should be 'leys' not 'lays'.
- flood plain
- I do mostly agree, however, there is nothing here about chemical/pesticide use which is very much a part of helping our nature recover.
- All priorities are important
- GMSF does the opposite to the priorities outlined for Bury
- Limitations on pesticide for farmers and councils
- I agree with all points Yet I cannot agree that there is only one choice you then offer as most urgent...we have let wildlife and its home (Habitat) become so degraded that ALL

need to be Prioritised...that in my opinion is what the recovery of our natural world has to have without delay.

- We agree with all points Yet cannot agree that there is only one choice you then offer as most urgent...we have let wildlife and its home (Habitat) become so degraded that ALL need to be Prioritised...that in our opinion is what the recovery of our natural world has to have without delay.

## 10. Which of the grasslands, farmland and lowland heath habitat priorities do you think is the most urgent?

There were 357 responses to this part of the question.

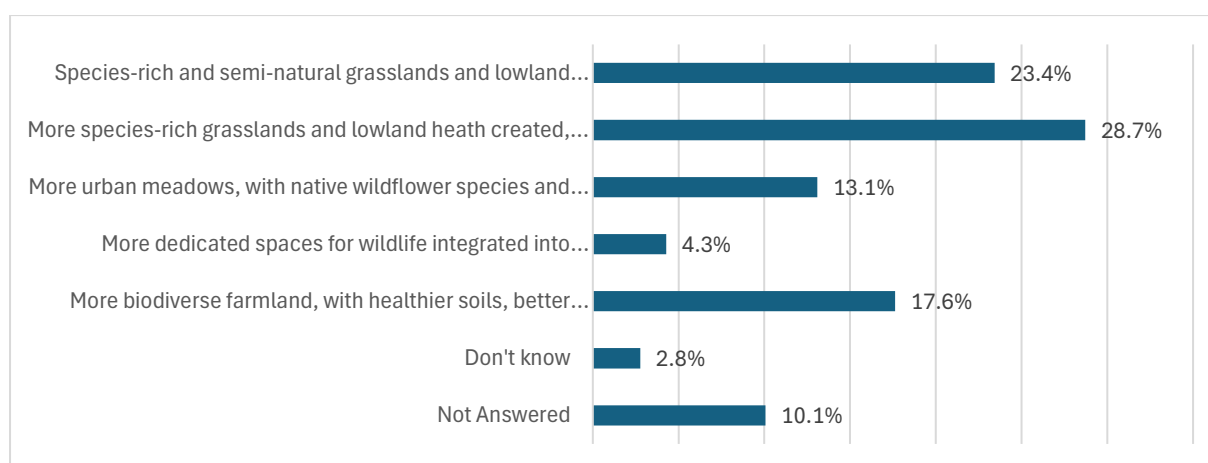


Figure 10- Percentage of respondents that considered each of the grasslands, farmland and lowland heath priorities to be the most urgent.

Option	Total	Percentage
Species-rich and semi-natural grasslands and lowland heath are safeguarded, well-managed and restored	93	23.4%
More species-rich grasslands and lowland heath created, particularly where they will connect existing habitats	114	28.7%
More urban meadows, with native wildflower species and longer grasses	52	13.1%
More dedicated spaces for wildlife integrated into farmland and buildings, alongside food production	17	4.3%

<b>More biodiverse farmland, with healthier soils, better water management and fewer intensively managed areas</b>	70	17.6%
<b>Don't know</b>	11	2.8%
<b>Not Answered</b>	40	10.1%

Table 10 - Number and percentage of respondents that considered each of the grasslands, farmland and lowland heath priorities to be the most urgent.

### 11. Are these the right priorities for rivers, canals and waterbodies in Greater Manchester?

There were 363 responses to this part of the question.

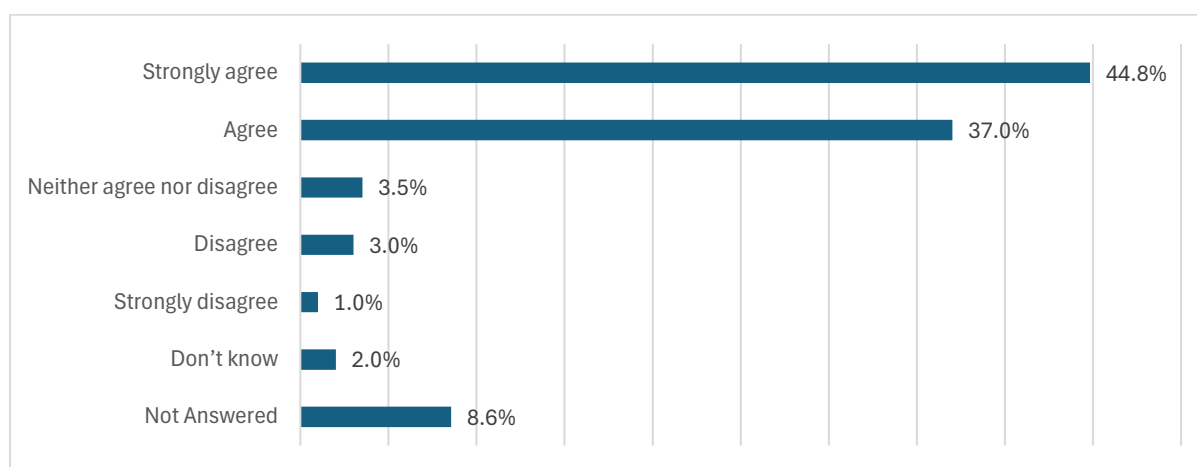


Figure 11- Percentage of respondents that agreed or disagreed with the rivers, canals and waterbodies priorities.

Option	Total	Percentage
<b>Strongly agree</b>	178	44.8%
<b>Agree</b>	147	37.0%
<b>Neither agree nor disagree</b>	14	3.5%
<b>Disagree</b>	12	3.0%
<b>Strongly disagree</b>	4	1.0%
<b>Don't know</b>	8	2.0%
<b>Not Answered</b>	34	8.6%

Table 11 - Number and percentage of respondents that agreed or disagreed with the rivers, canals and waterbodies priorities.

If you disagree or strongly disagree, what do you think is missing and why?

There were 32 responses to this part of the question.

- The areas we do have need to be properly managed. Living near a canal I would like to wander on it with the feeling of danger. Danger from unmanaged walkways, overgrown and dog fouling. Sides of canal walls need to be properly managed, clearing the overgrown weeds and shrubs
- better access to lakes and rivers for swimming in non-commercial set-ups (eg Trafford Council allows aggressive polluting jet skiers in Sale Water Park rather than wild swimmers.
- Mink eradication HAS to be part of the plan. Marple is doing it now, successfully! It needs to happen throughout G Manchester. See <https://www.waterliferecoverytrust.org.uk/>
- The rivers are polluted, streets and roads have litter that finds its way into waterways, we need more street cleaners and the water companies need to stop polluting rivers and lakes, start with the basics and work up, there is rubbish on most green areas used by the general public. Have a look around the walk ways near the dam and along the canal going toward Wigan tesco
- Strident measuring and prosecution of water companies pumping untreated effluent into rivers
- Need to stop agriculture polluting the waterways
- There is a conflict between spaces for active travel, recreation and nature (lighting, dogs etc) which is not addressed.
- Again no jobs, who is monitoring this? What about hubs for local monitors, where will they be?
- There is no mention of the use of rivers etc for angling, this is something that needs addressing, anglers look after the spaces they use.
- All are important points but again there are no clear targets or timescales for how this will be achieved. All these measures are welcomed but seem unrealistic without a clear objective especially considering the urban nature and degraded state of waterways in GM. Greater enforcement against companies polluting water is a priority along with invasive species management. Species cannot recover without this. Natural flood management and removing barriers for species movement is also important e.g. removing weirs and allowing fish ladder being installed at Manchester Ship Canal locks.

- We are concerned about water pollution and would like to see strong measures to address this in the future.
- The redevelopment of the canal network, especially the Rochdale Canal basin should also be included as opportunities to develop waterways and improve the quality of the waterways to attract businesses which will improve the quality and look of the canal in Rochdale. This will improve the quality of the waterway from being a dump to being cleaner attracting wildlife
- we have the fourth year of helping REDACTED remove Japanese knot weed from REDACTED & we have removed a lot of Himalayan Balsam so increased biodiversity and less INNS as was strangling our area but not now. Also we need the industrial old weirs modifying for our wild brown trout to move along the brooks ( Wild Trout Trust recent report confirmed this) and bank erosion from poor footpaths causing up to 15m of people erosion to avoid mud destroys our meadow sweets etc.
- I am concerned about water pollution in our rivers and would like to see strong measures to address this in the future. The GM bodies should also stop using United Utilities as a sponsor of Conference events and similar until there is a measurable improvement in water quality. I have seen a loss of Daubenton's bats and Dippers in recent years
- Need to stop farm run off into rivers.
- We agree with the priorities but believe there should be an additional one, namely: facilitate the use of canals and navigable rivers for leisure, recreational and active travel.
- Priority should be restoring river floodplains & enabling growth of wet woodland species.
- To reduce pollution and sewage entering our waterways
- There is a contradiction between increasing access by adopting/enhancing riverside paths and towpaths (especially for cycling) - which leads to widening of paths, loss of habitat and urbanisation; your priorities fail to acknowledge this contradiction.
- Should include reference to managing/tackling invasive species. A collaborative approach to dealing with these highly invasive species is key to the success of ecological enhancements across the wider network.
- combatting the spread of invasive plant species, particularly Himalayan Balsam. It destroys soil quality and increases erosion.
- These are some wonderful proactive points (carrots) but also should have some sticks - for example harsh legal and financial consequences for polluting rivers and surrounding

areas. Maybe this needs national legislation but is there a way it could also be covered in local bylaws and enforced rigorously locally with wardens. Also tightening up planning permission to ensure there is no building on floodplains, which does happen and shouldn't as flooding is increasing and these poor people would be severely impacted and unable to sell their homes. Perhaps some investment in flood defenses where this has already occurred and where rivers will flood also.

- I have concerns about access to rivers. Increased access is increased access for dogs. this strategy is about nature recovery. disturbance by dogs (think otters and common sandpiper) and insecticides from indiscriminate flea treatment puts humans ahead of nature.
- All are vital
- Agree with need for cleaner waterways, priority of flood management
- Control of INNS needs to feature heavily within Rivers, Canals and Waterbodies measures. It is currently probably the biggest threat but only mentioned once. Controlling INNS such as Himalayan balsam would be a measure against the priorities 1, 3 and 5, as well as 2, because they provide barriers to species movement, massively reduce species biodiversity, and reduce stability of bankside vegetation leading to increased runoff and loss of soil into river systems.
- I mostly agree, however, ponds should really be listed even if that is included in waterbodies. They provide unique benefits to wildlife and are often the absolute starting point for wildlife rich sites.
- All priorities are important
- GMSF does not support the priorities outlined. Natural floodplains are disregarded.
- All water should be clean but the importance of waterside plant life for breeding insects, so important for birds and small mammals, has not been mentioned. This does, of course get affected by flood management.
- I agree with all points Yet I cannot agree that there is only one choice you then offer as most urgent...we have let wildlife and its home (Habitat) become so degraded that ALL need to be Prioritised...that in my opinion is what the recovery of our natural world has to have without delay.
- We agree with all points Yet cannot agree that there is only one choice you then offer as most urgent...we have let wildlife and its home (Habitat) become so degraded that ALL

need to be Prioritised...that in our opinion is what the recovery of our natural world has to have without delay.

## 12. Which of these rivers, canals and waterbodies priorities do you think is the most urgent?

There were 359 responses to this part of the question.

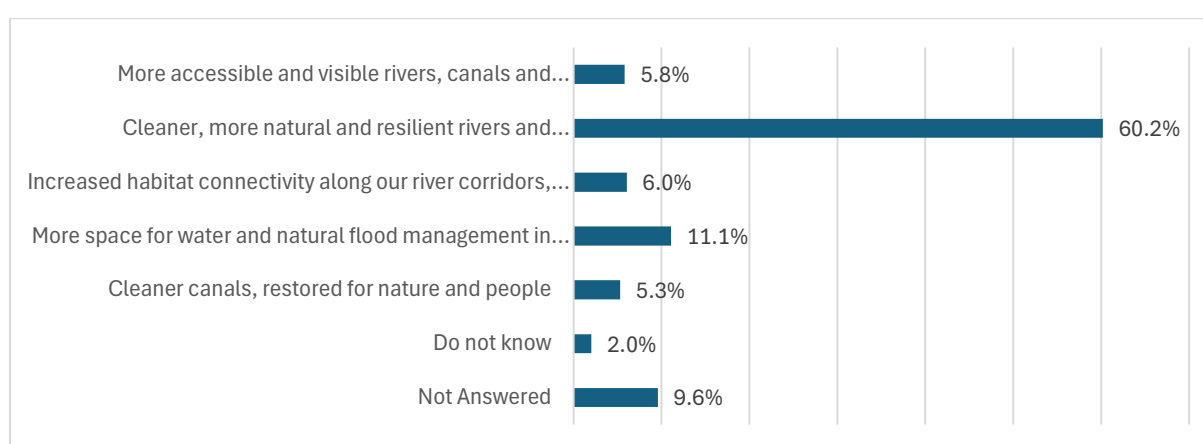


Figure 12 - Percentage of respondents that considered each of the rivers, canals and waterbodies priorities to be the most urgent.

Option	Total	Percentage
<b>More accessible and visible rivers, canals and waterbodies, with fewer barriers to species movement</b>	23	5.8%
<b>Cleaner, more natural and resilient rivers and waterbodies, that are well protected, maintained and biodiverse</b>	239	60.2%
<b>Increased habitat connectivity along our river corridors, canals and waterbodies</b>	24	6.0%
<b>More space for water and natural flood management in our communities and across catchments</b>	44	11.1%
<b>Cleaner canals, restored for nature and people</b>	21	5.3%
<b>Do not know</b>	8	2.0%
<b>Not Answered</b>	38	9.6%

Table 12 - Number and percentage of respondents that considered each of the rivers, canals and waterbodies priorities to be the most urgent.

### 13. Are these the right priorities for urban green spaces and buildings in Greater Manchester?

There were 365 responses to this part of the question.

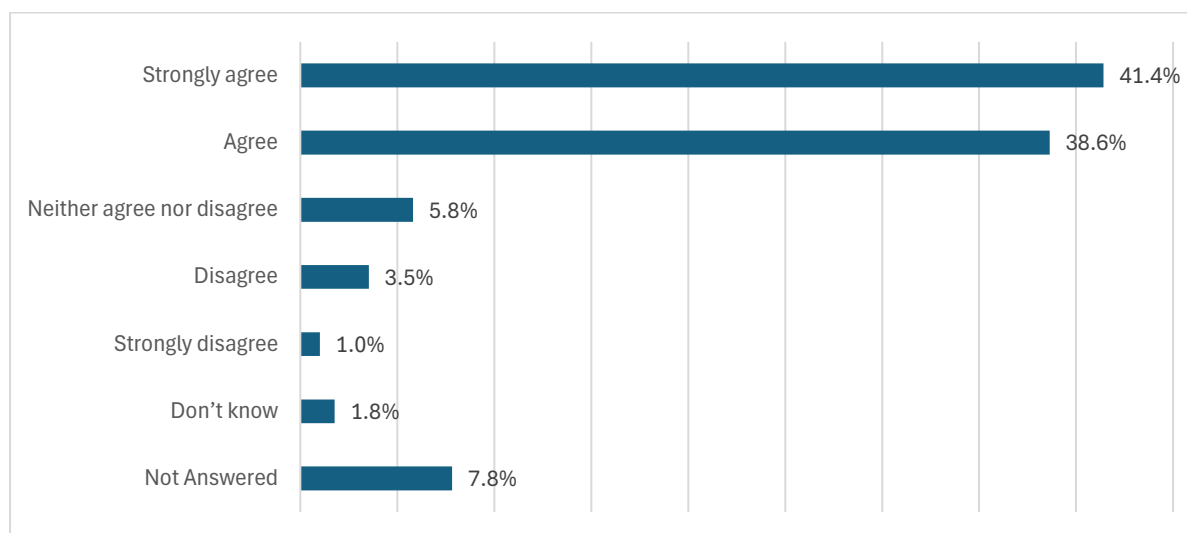


Figure 13 - Percentage of respondents that agreed or disagreed with the urban green spaces and buildings priorities.

Option	Total	Percentage
Strongly agree	164	41.4%
Agree	153	38.6%
Neither agree nor disagree	23	5.8%
Disagree	14	3.5%
Strongly disagree	4	1.0%
Don't know	7	1.8%
Not Answered	31	7.8%

Table 13- Number and percentage of respondents that agreed or disagreed with the urban green spaces and buildings priorities.

If you disagree or strongly disagree, what do you think is missing and why?

There were 44 responses to this part of the question.

- Again, this has to be alongside protecting and enhancing wildlife rich areas

- Grdens need to be properly managed. Particularly those in the rented sector, tenants do not see it as their responsibility to maintain Gardens and hedges. Too many are overgrown, spending out onto walkways and pavement areas
- In Chorlton, Manchester, it's just all about building building building. These are all really important targets.
- putting trees in the right place and not blocking off roads.
- The unloved spaces are where the wildlife, plants and birds make their home, once you take the wildness away you take away the habitat, you are expecting wildlife to live alongside humans, some will most won't, it just gets pushed further and further away
- I do not want to have to adhere to what the council wants me to do, I already do a good job with my garden. I have no wish to have nanny state interfering further than it does at present
- What about faith groups? Churches have lots of land and are thinking about this, but they should be encouraged more. Also other faith groups. We need some restraint on creating more car parks. Golf courses should be required to have shrubs and wildflower areas. Pesticides should be banned.
- Cycle routes and green/walking routes are top priority. For example, canal routes are fairly dangerous right now and need to be updated. They are such a good way of getting around the city, but many people feel they are dangerous and not maintained for them to use them regularly to commute. -New Builds need to be adapted for nature-rich accessible spaces so that it is better for wildlife and for people. There are ways of constructing new builds to best support people, planet and profit, but it takes a lot of planning. Community-led nature rich green spaces is essential to ensure that people work to maintain and protect the green spaces; having respect and support for the projects can often stem from being properly engaged with it and being heard in a substantive manner. Also teaching children about wildlife and nature outside of a classroom setting is a great way to start encouraging them to look after and take pride in green spaces around them. -The councils need to approach waste collection in a different manner. There is a lot of road-side litter and litter in green spaces. If people see litter, they are more likely to throw their litter there. More bins and rubbish pick up needs to be pursued to create a sense of individual pride and responsibility not to throw litter in these areas. We know that there are wider UK economic reasons acting as barriers to changing litter collection processes, but we think it something that needs to be invested

in to change people's perceptions about green spaces and could allow people to take pride in them. Also often fly-tipping stems from socio-economic issues, such not having the resources or space to dispose of litter correctly.

- We think it's very important to mention here the banning of herbicides and pesticide use in our urban spaces. The benefits of new, connect spaces will be lost if those maintaining these areas (e.g the council, private developers etc) are using pesticides and herbicides.
- But again where are the jobs???????
- More streets, roads, pedestrian and cycle routes are greener and tree-lined, acting as corridors for nature and adapted to climate change - this will create hazards - see the point about urban trees and cleaning
- Increase of urban greenspace and access for all is important. This could start with planting more trees in Manchester city centre for example and returning Picadilly Gardens to a public space with actual gardens as it used to be. More specific targets are needed for towns, villages and urban areas across GM, how will this be delivered and what timescales etc.
- We believe that nature rich and climate adapted areas are the most urgent but we also strongly feel that integration and connectivity of green spaces within urban areas (e.g. as on university campuses) is a high priority.
- This list is missing a priority to make nature-friendly new developments a priority (if not a mandate) for GM planning and regeneration. It's not just green spaces that can be enhanced for biodiversity and this should be a vital consideration in the light of the government's significant targets for new housing over the coming 5 years.
- Urban spaces provide the greatest opportunity for biodiversity intervention. I would like to suggest an alternative focus for urban spaces, an intervention that can be implemented on any area of disused land, including road verges, random grass patches dotted around, and is something that can be implemented directly at the building stage of new developments and will save money. I urge the GMCA to look at the research and work done by REDACTED around growing in low nutrient substrates. Using recycled materials like sand and crushed brick/concrete, you can create an inert patch of land that can be directly sown with wildflower seeds. The wildflower thrives in the low nutrient environment and benefits from the lack of competition from more vigorous species such as nettle, thistle and bramble. If sand is used, then you instantly provide a nesting site

for ground nesting bees and wasps (important pollinators). You can also add further interventions to the site like bee posts and hoverfly lagoons that will benefit an even larger list of pollinator species. The lack of nutrients means that the space will require far less maintenance, no mowing or strimming is required as the problematic species listed before will not take over. Wildflower can be left to die down and self seed each year providing floral displays year on year. It is a low cost, low maintenance, low carbon (if recycled materials used) intervention that has a massive biodiversity impact. It would not be to the detriment of the habitat there before, because you would be adapting grass patches that simply get mowed every few weeks and these provide little to no biodiversity value at all.

- I believe that nature rich and climate adapted areas are the most urgent but we also strongly feel that integration and connectivity of green spaces within urban areas (e.g. as on university campuses) is a high priority.
- Whilst agreeing where these promote Active Environments, it is essential therefore that the Greater Manchester Local Nature Recovery Strategy reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Paras 96, 98, 103, 104 and 200. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land.
- We agree with the priorities except that they should, where appropriate, reference green AND blue space
- Over time, as buildings deteriorate, remove buildings (except conservation-worthy buildings) from floodplains & valley bottoms.
- Improve existing spaces and protect them!
- we need to protect our existing urban wild spaces - like Ryebank Fields
- Story Homes agrees with the priorities identified and does not, at this stage, wish to comment in terms of urgency. The company recognises that opportunities exist to embed nature recovery strategies within the existing urban area and as part of new developments; this also reflects the statutory requirement to provide +10% BNG, and to achieve high quality design realm and landscaping as part of any new development
- We need more wild habitats within our cities, like Rye Bank Fields, as animal corridors and for bees and other insects, birds and hedgehogs etc..

- Again there are contradictions between, for example, council demands for close mown verges along transport corridors (e.g. beside cycle routes in greenspaces) and your vision for longer grasses and wildflower rich verges. You fail to acknowledge this.
- Prioritising the retention and enhancement of existing local greenspaces over development is completely missing here, and elsewhere in the strategy.
- Urban waterways have a role to play to maximise access to green/blue spaces and associated health and wellbeing. In particular the canal network passes through numerous urban areas across Greater Manchester.
- Improving access to public spaces and parkland, particularly within Manchester City centre. Stop building on the little amount of green space (e.g. Piccadilly Gardens).
- Its not that I necessarily disagree with the above priorities, I would however like to see consideration and appropriate protection via correct survey and monitoring for some post - industrial brownfield sites which may be species rich and very biodiverse. These may be lost to development when they could be preserved as already formed high value sites.
- When referring to road, cycle verges, please refer to Public Rights of Way and the National Trails within the Greater Manchester Area - Pennine Bridleway (53km within GM) and Pennine Way (13km within GM)
- We know gardens have potential to hugely increase biodiversity connectivity - need targeted funding to support people to enhance gardens and dig up drives!!
- As mentioned previously, building-dependent birds are overlooked by the priorities - they are also overlooked by DEFRA net gain methodology, so it's important that they are clearly considered. The existing text relating to Swifts and House Martins is welcome but note that the existing nest sites of these species will typically be located in or on buildings - please amend the text to state this. In summary, please consider building-dependent wildlife such as red-listed bird species which inhabit buildings in Greater Manchester. Therefore, please add: Swift bricks are a universal nest brick for small bird species and should be installed in new developments including extensions, in accordance with best practice guidance such as BS 42021 or CIEEM. Artificial nest cups for house martins may be proposed instead of swift bricks where recommended by an ecologist. Swift bricks are significantly more beneficial than external bird boxes as they are a permanent feature of the building, have zero maintenance requirements, are aesthetically integrated with the design of the building, and have better thermal

regulation with future climate change in mind. Also please add: Existing nest sites for building-dependent species such as swifts and house martins should be protected, as these endangered red-listed species which are present but declining in Greater Manchester, return annually to traditional nest sites. Mitigation should be provided if these nest sites cannot be protected. In more detail for supporting evidence, the reason for this is that nest sites in buildings and bird boxes/ bricks and other species features are excluded from the DEFRA Biodiversity Net Gain metric, so require their own clear policy. The Government's response in March 2023 to the 2022 BNG consultation stated that: "We plan to keep species features, like bat and bird boxes, outside the scope of the biodiversity metric... [and] allow local planning authorities to consider what conditions in relation to those features may be appropriate" (page 27, [https://consult.defra.gov.uk/defra-net-gain-consultation-team/technicalconsultation\\_biodiversitymetric/](https://consult.defra.gov.uk/defra-net-gain-consultation-team/technicalconsultation_biodiversitymetric/)). NPPF December 2024 Paragraph 187 (d) (page 54) states: "planning policies should... incorporate features which support priority or threatened species such as swifts". Swift bricks are the only type of bird box specifically mentioned as valuable to wildlife in national planning guidance, along with bat boxes and hedgehog highways (NPPG Natural Environment 2019 paragraph 023). The National Model Design Code Part 2 Guidance Notes (2021) also recommends bird bricks (Integrating Habitats section on page 25, and Creating Habitats section on page 26). Swift bricks are considered a universal nest brick suitable for a wide range of small bird species including swifts, house sparrows and starlings (e.g. see NHBC Foundation: Biodiversity in New Housing Developments (April 2021) Section 8.1 Nest sites for birds, page 42: [https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments\\_FINAL.pdf](https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments_FINAL.pdf) ). Therefore, swift bricks should be included in all developments following best-practice guidance (which is available in BS 42021:2022 and from CIEEM (<https://cieem.net/resource/the-swift-a-bird-you-need-to-help/>)). Many local authorities are including detailed swift brick requirements in their plans, such as Tower Hamlets Local Plan Regulation 19 stage (paragraph 18.72, page 328 - <https://talk.towerhamlets.gov.uk/local-plan> ), which follows the exemplary swift brick guidance implemented by Brighton & Hove since 2020, and Wiltshire Local Plan Regulation 19 stage, which requires an enhanced number of 2 swift bricks per dwelling (policy 88: Biodiversity in the built environment, page 246 - "As a minimum, the following are required within new proposals: 1. integrate integral bird nest bricks (e.g., swift bricks) at a minimum of two per dwelling;"

<https://www.wiltshire.gov.uk/article/8048/Current-consultation-Reg-19> ), and Cotswold District Council are proposing three swift bricks per dwelling in their current Local Plan consultation (Policy EN8 item 6, and paragraph 0.8.4,

<https://www.cotswold.gov.uk/planning-and-building/planning-policy/local-plan-update-and-supporting-information/> ), so such an enhanced level should also be considered.

- Fewer roads and green corridors for cycling and walking
- Clearer target around creating new public green spaces e.g. parks
- No mention of open mosaic habitat on previously developed land, given the industrial past of Greater Manchester a high proportion of existing sites arguably are this, or have been prior to succession / management to other habitats. There are still good examples of this habitat around with high importance for invertebrate assemblages (among others) which need to be protected and enhanced. They are at risk of being seen as easy targets for the priority habitats (so get covered by trees or inappropriate management as grasslands) and therefore will be lost for well meaning but misguided reasons (as has / is already happened in a lot of cases).
- There need to be more specifics on how the planning system can help nature recovery in the city region. Local authorities, developers, builders, housing associations etc. are best placed to help urban nature by adopting policies that directly help. Those policies need to be better than the flawed Biodiversity Net Gain and need to be much better enforced. An example would be for all 10 local authorities adopting a policy requiring swift bricks/boxes for new builds and refurbishments. The swift, one of the strategy's priority species, is a great example of where human activity has devastated nature, but also one of how easily we could help a recovery. Bury council is leading the way on this and the efforts of community groups like South Manchester Swifts who are putting huge effort in trying to help this species, could be boosted massively by support from local authorities, developers, etc
- Need to focus on areas such as Ryebank Fields. A rewilded biodiversity space that enhances all local areas, Inc near to 2 schools. Excellent location for learning& exploring & enhanced air quality from within it.
- We think it is particularly important that this section demonstrates how it is supporting the aim to "Create more wildlife-rich resilient spaces, where they will expand and connect spaces for wildlife and people. " We feel that the priorities should be aimed at how the creation and management of open spaces within the urban environment can

best enable the movement of wildlife through built up areas. Green space should be managed in a way that prevents our urban environment becoming a blockage to and preventing movement within urban areas. Open spaces can act as stepping stones for wildlife, where corridors are not feasible or possible, increasing the porosity of movement for wildlife so that it can connect with the wider environment. A priority “to increase and appropriately manage open green space to provide stepping-stones and corridors that link through the urban environment connecting to the wider habitats outside of the urban areas” would be welcome.

- valuing the leadership of community members, and their ownership of their neighbourhood green spaces. No patronizing, or trampling over their visions.
- Is anything missing from this list?
- All priorities are important
- Stop mowing road verges where there is no road safety risk, and build more dedicated cycle paths with wild verges.
- We would create habitats for wildlife in urban gardens, encouraging residents to value birds and hedgehogs. Swifts would benefit from swift nesting boxes but also Planning Departments asking developers for swift bricks on new buildings. These offer swifts much need stable and permanent
- I agree with all points Yet I cannot agree that there is only one choice you then offer as most urgent...we have let wildlife and its home (Habitat) become so degraded that ALL need to be Prioritised...that in my opinion is what the recovery of our natural world has to have without delay.
- We agree with all points Yet cannot agree that there is only one choice you then offer as most urgent...we have let wildlife and its home (Habitat) become so degraded that ALL need to be Prioritised...that in our opinion is what the recovery of our natural world has to have without delay.

#### 14. Which of these urban green spaces and buildings priorities do you think is the most urgent?

There were 359 responses to this part of the question.

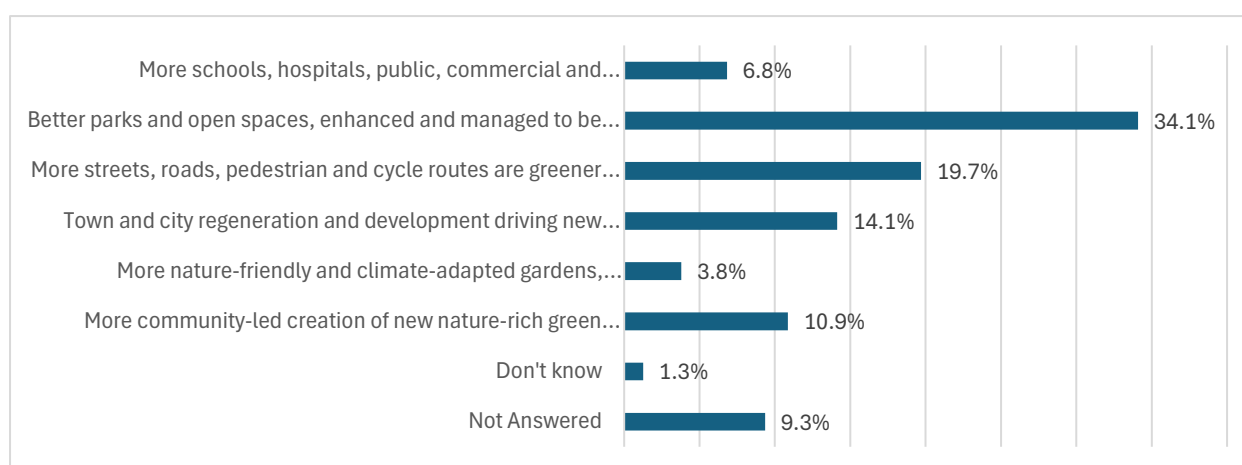


Figure 14- Percentage of respondents that considered each of the urban green spaces and buildings priorities to be most urgent.

Option	Total	Percentage
<b>More schools, hospitals, public, commercial and community buildings have nature-rich accessible spaces, better for wildlife and people</b>	27	6.8%
<b>Better parks and open spaces, enhanced and managed to be nature-rich and climate-adapted, with a range of habitats for wildlife supported by local communities</b>	135	34.1%
<b>More streets, roads, pedestrian and cycle routes are greener and tree-lined, acting as corridors for nature and adapted to climate change</b>	78	19.7%

<b>Town and city regeneration and development driving new and enhanced nature-rich green space creation, building more biodiverse, accessible and climate-adapted places</b>	56	14.1%
<b>More nature-friendly and climate-adapted gardens, balconies, yards and driveways</b>	15	3.8%
<b>More community-led creation of new nature-rich green spaces and increased opportunities for local food growing</b>	43	10.9%
<b>Don't know</b>	5	1.3%
<b>Not Answered</b>	37	9.3%

Table 14- Number and percentage of respondents that considered each of the urban green spaces and buildings priorities to be most urgent.

### 15. Are these the right priorities for lowland wetlands and mossland habitats in Greater Manchester?

There were 359 responses to this part of the question.

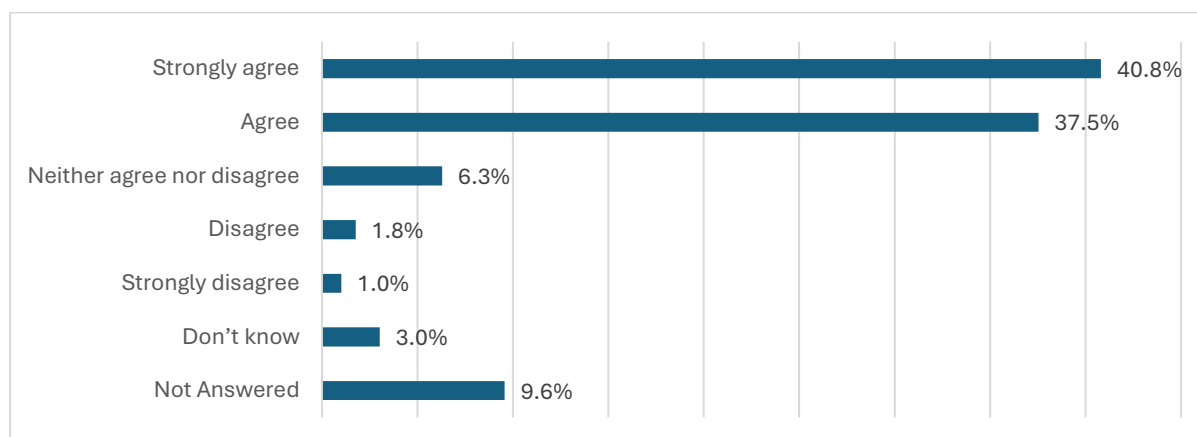


Figure 15 - Percentage of respondents that agreed or disagreed with the lowland wetlands and mossland priorities.

Option	Total	Percentage
<b>Strongly agree</b>	162	40.8%
<b>Agree</b>	149	37.5%
<b>Neither agree nor disagree</b>	25	6.3%
<b>Disagree</b>	7	1.8%
<b>Strongly disagree</b>	4	1.0%
<b>Don't know</b>	12	3.0%

<b>Not Answered</b>	<b>38</b>	<b>9.6%</b>
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Table 15 - Number and percentage of respondents that agreed or disagreed with the lowland wetlands and mossland priorities.

If you disagree or strongly disagree, what do you think is missing and why?

There were 19 responses to this part of the question.

- Again these areas are important but need proper ongoing management.  
Too many times funds are found to develop such areas, but not to maintain them on an ongoing basis
- don't start removing agricultural land as it will need us to import more food from abroad causing more pollution
- How many ponds are in Wigan? When I was growing up there were ponds everywhere, now all filled in and built on, now the odd large lake like Scotsmen flash, never seen newt for ages, I am disheartened, you can't put the clock back, just stop further development and create new areas and protect them as close as possible to towns, you talk about building new hospitals and schools, when you have pulled them down and built houses on them, how stupid to think that new developments on previous schools and hospitals was a good idea, special schools for children with disabilities closed down and built on, children forced into main stream schools which they can't cope with, how stupid! Mental health hospitals closed and built on! Community areas built on! Greater Manchester is still making the same mistakes over and over again, there is no room for nature
- Ponds are being neglected on farmland etc wholesale
- Rethink building on existing mossland e.g. Carrington Moss - ensuring wildlife corridors, local renewable energy generation and active travel options.#
- Great ideas but where are the jobs
- The first priority should be to safeguard existing sites of lowland raised bog or 'mosslands' which is internationally rare, even if degraded and preventing development on these sites e.g. Barton Moss and Carrington Moss. Small sites are prone to drying out and no longer function hydrologically. Restoring damaged 'mosslands' e.g. Croxdens peat works and Astley Quarry are the next priority followed by extending small and isolated sites such as Highfield Moss SSSI. Then linking existing isolated sites across Chat, Astley, Bedford, and Worsley Mosses together at a landscape scale will

create long-term benefits for climate and wildlife. More specific targets such as timescales are needed.

- A proper evidence-based and scientifically-balanced discussion of the merits and demerits of increasing emphasis on lowland wetlands and mossland habitats is missing. Whilst the concept is, at one level, intellectually appealing, it may not, in fact, be an appropriate priority. In terms of proposed land use, this priority may not necessarily represent best use, or best practice. Justification for such an approach is missing and needs to be made much more apparent to explain why this might be an appropriate priority.
- While restoring such habitats emphasize restoring integrated original ancient woodland.
- Yes, if all wetland opportunities were being considered, including those being proposed for housing
- I think the emphasis should be on retaining and improving wetland and mosslands and not on improving access with new cycleways. This just turns these areas into urban playgrounds. The acquisition of Winter Hill by the Woodland Trust is a prime example of this mistake. The area is now crisscrossed with cycle ways to the detriment of returning species such as curlew. It has become an urban playground. This does not help nature.
- Reference the Pennine Bridleway and Pennine Way National Trails and Public Rights of Way in their role reconnecting local communities to nature
- protection of existing mosslands such as Carrington Moss must be included as a priority
- Unsure regarding these areas
- All priorities are important
- GMSF does not support the priorities outlined.
- I think protecting and conserving urban wetland habitats need to be mentioned.
- I agree with all points Yet I cannot agree that there is only one choice you then offer as most urgent...we have let wildlife and its home (Habitat) become so degraded that ALL need to be Prioritised...that in my opinion is what the recovery of our natural world has to have without delay.
- We agree with all points Yet cannot agree that there is only one choice you then offer as most urgent...we have let wildlife and its home (Habitat) become so degraded that ALL need to be Prioritised...that in our opinion is what the recovery of our natural world has to have without delay. We live alongside one of the Irreplaceable Habitats that is the whole of Chat Moss and have witnessed the severe decline of wildlife and habitats in

this area. If this is a Nature-led strategy, based on nature potential where development decisions take proper account of harm to nature-rich areas there is need for more local knowledge to be part of the process. Not just each Borough but at ward level.

# 16. Which of these lowland wetlands and mossland habitat priorities do you think is the most urgent?

There were 349 responses to this part of the question.

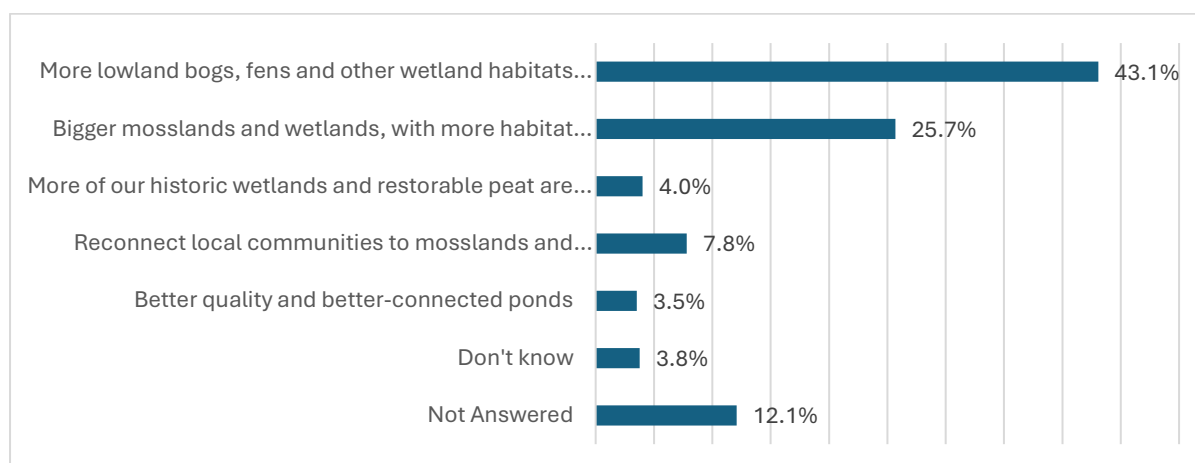


Figure 16 - Percentage of respondents that considered each of the lowland wetlands and mossland priorities to be the most urgent.

Option	Total	Percentage
<b>More lowland bogs, fens and other wetland habitats are restored and better managed for nature, able to store more water and emit less carbon</b>	171	43.1%
<b>Bigger mosslands and wetlands, with more habitat corridors and stepping stones reconnecting and expanding remaining habitats</b>	102	25.7%
<b>More of our historic wetlands and restorable peat are wet</b>	16	4.0%
<b>Reconnect local communities to mosslands and wetlands, and their heritage</b>	31	7.8%
<b>Better quality and better-connected ponds</b>	14	3.5%
<b>Don't know</b>	15	3.8%
<b>Not Answered</b>	48	12.1%

Table 16 - Number and percentage of respondents that considered each of the lowland wetlands and mossland priorities to be the most urgent.

## 17. Are these the right priorities for upland moorland habitats in Greater Manchester?

There were 357 responses to this part of the question.

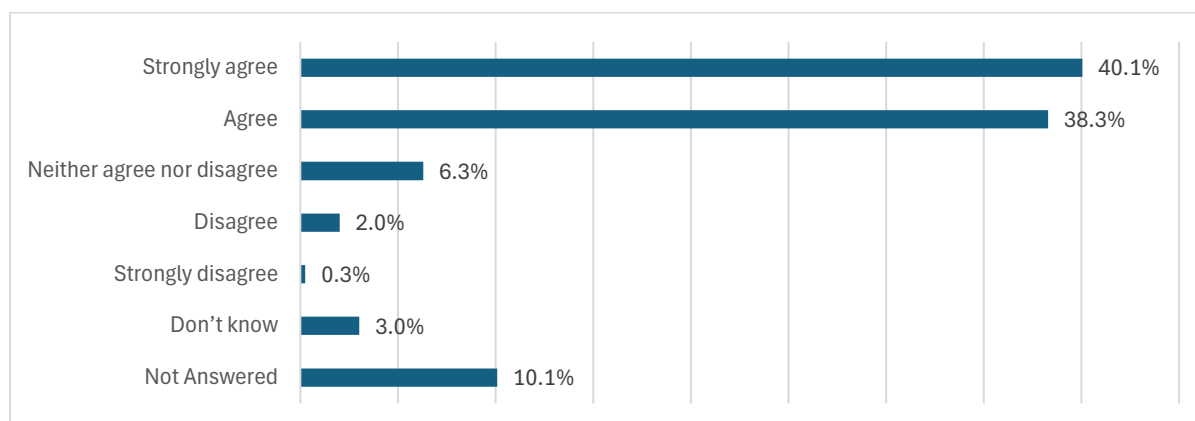


Figure 17- Percentage of respondents that agreed or disagreed with the upland moorland priorities.

Option	Total	Percentage
Strongly agree	159	40.1%
Agree	152	38.3%
Neither agree nor disagree	25	6.3%
Disagree	8	2.0%
Strongly disagree	1	0.3%
Don't know	12	3.0%
Not Answered	40	10.1%

Table 17- Number and percentage of respondents that agreed or disagreed with the upland moorland priorities.

If you disagree or strongly disagree, what do you think is missing and why?

There were 16 responses to this part of the question.

- It is more about on going management of existing areas. We have so many but the over overgrown, out of control and not nice places to go
- The land needs to be in public ownership, private owners use the land for profit not for wildlife, in fact they kill anything that impinge on their profits
- Erosion of habitats should be repaired but long term introduction of trees onto the upper moorlands is not conducive to climate trends, it is more akin to King Canute so leave the trees off the tops please

- yes but we need more visitor centers by the RSPB and woodland trust, more jobs
- I agree with the targets as all are important, but the underlying issues also need addressing. This includes overgrazing by livestock such as sheep, working with landowners and the prevention of burning on the moors for intensive grouse shooting. Along with this, greater enforcement and prevention of wildlife crime by grouse moors. Scrub/tree creation is welcome in the right places but to ensure this is done with expert conservation guidance as without proper planning could cause increase in predation of ground nesting birds, and drying out of wet areas.
- We agree with the priorities but the lack of space to add comments to explore our opinion is an oversight. Therefore please consider the following points. We were pleased to see recognition of grouse alongside livestock and water resources as examples of uplands being working landscapes. Sustainable grouse shooting looks after peatland soils, maintaining high water tables and uses tools to manage the vegetation, including cutting and, where appropriate, managed cool burning to reduce the fuel load. This creates fire breaks and a mosaic of vegetation types and ages on which grouse and other priority species rely. This connects well with each of the priorities and measures within Appendix 7 relating to uplands, sustainable grouse shooting works alongside each one of those priorities. The wildfire at Saddleworth moor covered 18 square km and was hugely damaging to the habitat above ground as well as the carbon rich peat soils below. Additionally, the catastrophic wildfire around the Corrimony Nature Reserve in May 2023 in Scotland underlined that wildlife risk is not mitigated by high water tables. Although we agree that rewetting peatlands is vital for carbon storage and nature recovery, it has little benefit to reduce wildfire risk. One of the critical factors in reducing wildfire risk and impacts is managing fuel loads, which is done through managed burning or cutting and removal and having wildfire mitigation plans in place. A long-term study by York University compared management options for nature recovery and climate. This included non-intervention, cutting and leaving in situ and managed burning. This found that managed burning was a valid management tool in upland landscapes and because the study gathered data over a 10-year period it was able to study vegetation regrowth over a much longer-term than many other similar studies. It revealed the net impact on carbon in the soil was neutral to positive – effectively, managed burning over the entire cycle sequesters carbon. We would hope and expect

the LNRS to support appropriate use of managed burning as a valid management option in the delivery phase.

- All of the above are urgent; water retention here may spare habitat downstream from damaging flood mitigation measures.
- Landowners who damage the peat and upland moor ought to be held accountable. Particularly gamekeepers and the moorland still used for hunting, such a Grouse shooting
- I have concerns about the trees that are 'naturally' occurring. oftentimes this is due to the land being too dry due to loss of bog. If peat is deep then birch and other tree encroachment is drying peat out further and should be discouraged through grazing and rewetting.
- The word "bare" is not needed in the first bullet point. Peatlands need restoring and rewetting whether they are bare or not. There are not many areas of bare peat left due to previous restoration efforts but there are still large areas of degraded, species-poor peatland.
- Comment: on measure '...wildfire risk management...' should include '...and increase firefighting capabilities.'
- All priorities are important
- GMSF does not support the existing wetland areas priorities
- I live very close to upland moorland habitats. The lack of active management/policing coupled with the complete apathy of the council's planning and environmental departments, allows rogue private developers and landowners to get away with polluting and destroying the uplands wildlife habitats. Therefore I strongly believe a commitment to protecting/policing the uplands from such destruction needs to be an integral part of the recovery plan.
- Our protected peatlands should be protected from all development, this would include inappropriate tree planting and windfarms: these should be banned on protected peat, as peat is such an important carbon store the process of installing the infrastructure for windfarms does irreparable damage which counteracts any of the benefits of generating green energy.
- I think greatly restricting grouse shooting areas, or banning it from GM would greatly benefit the uplands.

## 18. Which of these upland moorland habitat priorities do you think is the most urgent?

There were 351 responses to this part of the question.



Figure 18- Percentage of respondents that considered each of the upland moorland priorities to be the most urgent.

Option	Total	Percentage
<b>Restore and rewet bare upland peat to active blanket bog and wet heath, to retain more carbon and hold more rainwater</b>	109	27.8%
<b>More varied and well-functioning upland habitats, with patchworks of restored bog, heath, trees, springs and flushes, reducing flood and wildfire risk</b>	118	30.1%
<b>More of our upland flushes are thriving, rich with sphagnum moss, rushes and sedges, supporting a diverse range of species</b>	26	6.6%
<b>More trees, small woods and scrub are naturally regenerating, across our uplands, helping slow and store water</b>	58	14.8%
<b>More upland communities, land managers and landowners are rewarded for helping nature recover</b>	20	5.1%
<b>Don't know</b>	20	5.1%
<b>Not Answered</b>	41	10.5%

Table 18 - Number and percentage of respondents that considered each of the upland moorland priorities to be the most urgent.

## 19. Are these the right priority species and species groups for Greater Manchester?

There were 374 responses to this part of the question.

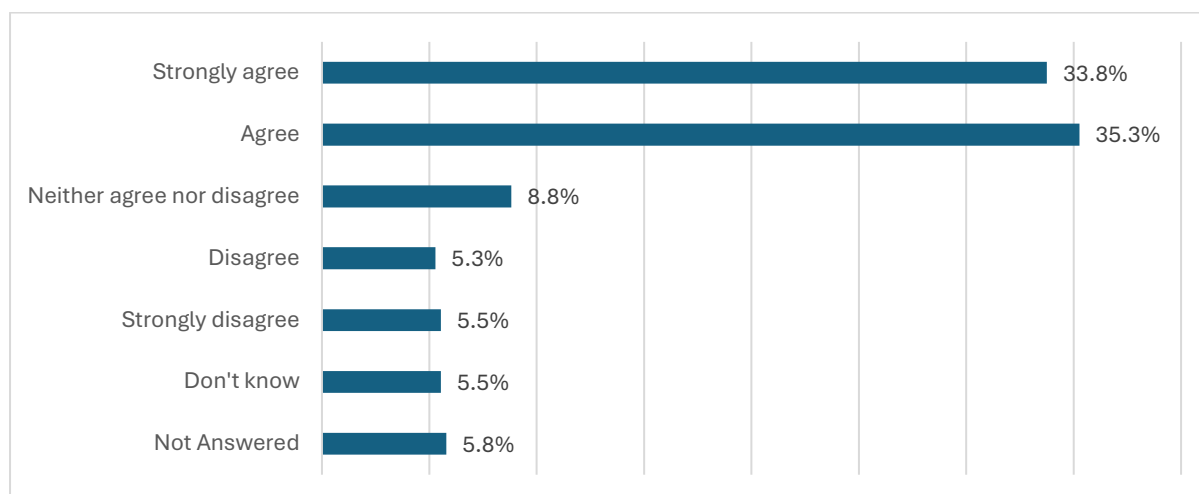


Figure 19 - Percentage of respondents that agreed or disagreed with the priority species and species groups.

Option	Total	Percentage
Strongly agree	134	33.8%
Agree	140	35.3%
Neither agree nor disagree	35	8.8%
Disagree	21	5.3%
Strongly disagree	22	5.5%
Don't know	22	5.5%
Not Answered	23	5.8%

Table 19 - Number and percentage of respondents that agreed or disagreed with the priority species and species groups.

If you disagree or strongly disagree, what do you think is missing and why?

There were 69 responses to this part of the question.

- Most of these species do not exist in the urban areas where most of us live. There are much better known species that are being wiped out right now and the continued destruction of green spaces in Greater Manchester for development is hastening this problem. The most urgent priority must therefore be to halt the neglect and destruction of these spaces in the city, where the idea of seeing a curlew or a salmon is fanciful when you're actually lucky now to see any kind of butterfly.
- Swifts and House Martins have not been included

- We need more management of existing areas
- OTTERS
- Red squirrel could we reintroduce ?
- All those plus beavers, kingfishers, red squirrels and herons.
- For one species to flourish, you need all wildlife to flourish, as I understand it you can't help one species in isolation
- The slow worm is not a species prevalent here and has not been for generations. It seems to me that implementation of these measures will see restriction of movement, I am absolutely against this.
- We are the city with the bee emblem. What about urban bees? Urban butterflies. what about indicator of how many trees people of Manchester can identify? or children in Manchester?
- the insect population has massively declined. You need to create jobs for specialist wildlife centers!!!!
- NO mention of dragonflies and damselflies. Newts, frogs and toads also not specifically mentioned.
- These species are all important although it would be better to list them individually from the groups as they have separate habitat requirements. Also policies are to develop brownfields which is contradictory to protecting brownfield insects habitats, this needs addressing with important brownfield sites becoming designated.
- Bats are missing from this list. Our group have a strong interest in educating the community about bats in our local area and we believe more efforts are needed to support their habitats and the overall bat population.
- Waxcaps should not be included as their scarcity/commonness is not known across GM as a whole.
- SMBC need to stop giving planning permission on greenbelt areas and where there is existing habitat. It is completely irresponsible and hypocritical to say that you want a nature plan but then completely undo any steps forward with planning permission in natural habitat which already exists and is well established!
- Urban areas can be invertebrate hotspots as well if direct interventions are implemented.
- Common toad also needs adding
- Delete Black necked Grebe ; insert Great Crested Grebe and Little Grebe

- Nature decides which species survives and thrives - humans can only support by not taking away their habitats in the 1st place. There is no real understanding of the root cause regarding the reasons why these species have shown significant reduction - yet - everyone knows why - Humans take away their environment and replace it with concrete and polluting vehicles which remove their homes and often kill them by running them over. Create a space - leave them alone (i.e. protect them) and nature will restore the balance as nature sees fit.
- Bats are missing from this list. I lead REDACTED and have a strong interest in educating the community about bats in our local area and we believe more efforts are needed to support their habitats and the overall bat population.
- We agree with the priorities but the lack of space to add comments to explore our opinion is an oversight. Therefore please consider the following points. Mountain hares We looked at the actions for mountain hare and were pleased to see monitoring is a priority action. Annual surveys of mountain hares are now being undertaken where possible by a collective of gamekeepers across the Peak District area. This long-term, consistent approach to monitoring is vital to understanding trends in a species whose population is susceptible to inter-annual fluctuations. We found the first action unclear. Fencing makes sense for livestock as high grazing pressure by sheep can drive declines in mountain hares due to competition for young heather growth. However, it makes little sense for predators of leverets and adult mountain hares. We would be happy to engage with you on the detail around this because where practiced sustainably, moorland management by upland gamekeepers facilitates the persistence of mountain hares in mosaic habitats. Finally, as a cross reference to the uplands habitat priority, replanting schemes in or around upland habitats, it may be critical to specifically exclude hares (using appropriate tree tubes for example) to prevent damage to saplings and young trees. Water vole BASC and the shooting community have been engaged in water vole recovery for over three decades and have substantial expertise in the area, providing training to volunteers and staff who need to humanely trap and dispatch American mink. BASC support many regional water vole projects. We highlight the Waterlife Recovery Trust who have effectively eradicated mink from large parts of East Anglia through the application of modern technology and solid science coupled with volunteer engagement. It is a model other water vole projects should be learning from to apply in their areas. Grassland ground nesting birds: Curlew, lapwing, twite,

skylark, golden plover, dunlin, snipe. This group of lowland grassland nesting wading birds share three reasons for decline. Insufficient habitat, habitat that is not correctly managed for them and losses of eggs and chicks to generalist predators. The bespoke action 'Protection of nesting sites from predators, livestock and human disturbance using fencing, signage or other exclusion methods' is incomplete and needs to be paired with effective, humane predator control measures. It is undoubtedly helpful to protect nests and eggs from mammalian predation using fences but once hatched the family become mobile and can forage outside of the fenced area and so these chicks are at risk from mammalian predators. Therefore, fencing alone will not fully or effectively address reducing predation. The Curlew Recovery Partnership (England) is encouraging Defra to fund coordinated landscape scale management of generalist predators, especially fox and carrion crow because this is necessary to see sufficient fledging rates for curlew populations to stop population decline and start recovery. Therefore, we recommend including fox and carrion crow management as actions in addition to fencing.

**Reintroductions** We appreciate you listing the species requested to be reintroduced from public consultation and your thoughtful response to them. BASC is supportive of reintroductions when they properly follow IUCN and England guidelines, they are landowner led and when there is effective provision for taking appropriate steps should undesirable outcomes result from a reintroduction. We are also keen that reintroductions do not overpromise the potential benefits during feasibility and the decision-making process whether to reintroduce, which are then not properly monitored for in the long-term to see if they did indeed occur or not. We have a few comments on the species highlighted. Defra's position on beaver protection and management is an essential reference. It has been the product of careful consideration and provides a full framework for deciding whether to reintroduce and how to consider, reduce and mitigate conflicts that beavers bring into a landscape. Specifically, the Defra position recognises that beavers can cause conflicts with local people and takes people through a process to avoid, mitigate or intervene to resolve issues. Your approach to birds of prey is sensible and pragmatic. We would agree that red kites will spread into the region given time. What we applaud is your approach to pine marten. The correct approach is to improve woodland networks in readiness for their arrival because it reduces the risks of pine martens being killed when crossing roads. It also acts as another driver for meeting woodland cover targets. BASC would like to see more evidence of the benefits pine marten bring to the reduction in the grey squirrel population, especially in relation to red

squirrel recovery. Pine marten reintroduction projects in England and Wales have not provided evidence to date that predation on grey squirrel populations is reducing them to the point at which commercial woodland and woodland ecosystem damage is avoided or where red squirrel reintroduction could be feasible.

- Should include small mammals e.g. Squirrels.
- With increased intensive farming and veiled hunts, foxes have also diminished in abundance by 47% since 1998. We need to evaluate what can be done AHEAD OF TIME. Because like badgers, hares and hedgehogs, they too will eventually be considered endangered if attitudes towards them do not change. With urbanisation such as it is we need to be making space in policies to actively provide space for many creatures not yet listed but which will be in our children's lifetimes. i.e. a further addition to the strategy informing targets and priorities should include preparation for habitat action for ALL species.
- we need to protect Ryebank Fields and the species that thrive there
- One for the experts!.
- This gives the impression these are the only species relevant to GM's LNRS, but they are just a small subset identified as requiring bespoke measures on top of habitat intervention. The longer list of threatened species targeted for LNRS benefit in GM, agreed after many weeks of investigation, has been completely omitted. The strategy must make clear that ALL those species are to be assessed when reviewing its effectiveness, and any not considered or enhanced through LNRS action reflect a failure in the strategy.
- Dear GM Nature Recovery, Please find below a considered response from Bolton and Bury Swifts Conservation Group, which focuses on Swifts and House Martins within the GM Strategy. Under the section:- \*Working together to take action for nature and embed space for nature and people to thrive across all our communities\* And "Urban" We disagree with the plan and would like to submit the following:- Building-dependent birds are overlooked by the main priorities and are also overlooked by DEFRA net gain methodology. Text relating to Swifts and House Martins is of course very welcome but our group would request further specifics in terms of the wording for these declining Red List species as current wording in the plan is brief and does not spell out in detail what Local Authorities can and should do. The existing nest sites of Red List Swifts and House Martins will typically be located in or on buildings; these should be retained and

protected where possible, and mitigation provided when retention is not possible; Nest boxes should be integrated \*swift bricks\* where possible; these are universal nest bricks for cavity-nesting small bird species, they're permanent with no maintenance requirements and unlike Sparrow Terraces they can be used by Swifts and Sparrows alike. New build development including extensions should follow best-practice guidance such as British Standard BS 42021, which promotes Swift Bricks as the integrated bird brick to use. Artificial nest cups for House Martins may be installed instead where recommended by an ecologist. Further note; Our surveys show existing colonies are frequently (but not exclusively) found on Social Housing. Any works to the exterior of the buildings by Housing Associations and Local Authorities should include appropriate mitigation, by retaining open eaves style or provision of Swift Nest boxes or bricks and take place outside the breeding season of May to August.

- We note that there is no reference to aquatic plants. The canal network supports a number of nationally rare aquatic plants which should be added here, including *Luronium natans*.
- I agree in principle but the core problem does not seem to be addressed. The bottom of the food chain needs to be prioritised if many of these species are to recover. There are basically too few insects probably through the use of pesticides. Gone are the days when, after an evening drive, you had to clean a mass of insect remains from your windscreen before it dried. This gives a realistic view of how insect populations have fallen - at least for those old enough to remember.
- Reintroduction of keystone species in partnership with local farmers and communities. Animals such as, Pine Martens, Beavers, etc..
- When referring under "Hedgehog" to "Create greener spaces, and more connected habitats, along existing and new streets, highways and cycleways", please include Public Rights of Way and the two National Trails within GM - Pennine Bridleway and Pennine Way
- Ensuring insect populations supported then enable larger species to thrive ....
- mountain hare is not locally native and goes white in the winter, we are having increasingly less snowy winters. focusing on mountain hare would be a waste of resources. Curlew would be more appropriate. or hen harrier.
- This only mentions a small subset of 'priority' species requiring bespoke measures, extra to habitat interventions. The longer list of threatened species in GM, agreed for

LNRS benefit after many weeks of investigation, has been completely omitted, including key indicator species such as bats, and they must be included. The strategy must make clear that ALL those 400+ species will be assessed in reviewing its effectiveness, and any not enhanced through LNRS action will help highlight shortfalls in the strategy

- This only mentions a small subset of 'priority' species requiring bespoke measures, extra to habitat interventions. The longer list of threatened species in GM, agreed for LNRS benefit after many weeks of investigation, has been completely omitted. Bats, which are included in the omitted long list, must be included in the LNRS as key UK Indicator and Keystone species'. The strategy must make clear that ALL those 400+ species will be assessed in reviewing its effectiveness, and any not enhanced through LNRS action will help highlight shortfalls in the strategy
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- Bats if you get habitat right for bats, it is better for many more wildlife e.g. importance of oak trees.
- The LNRS currently includes only a small number of "priority" species that require specific measures beyond general habitat improvements. However, this does not cover the full range of threatened species in Greater Manchester. A longer list of over 400 threatened species, which was carefully compiled after extensive research, has been entirely left out of the strategy. Bats are among the omitted species, yet they are particularly significant as both UK Indicator Species (reflecting broader environmental

health) and Keystone Species (playing a crucial role in ecosystem functioning). Their exclusion undermines the strategy's effectiveness.

- The LNRS only includes a small selection of priority species that need special measures beyond habitat improvements. However, a longer list of over 400 threatened species in Greater Manchester, which was carefully researched, has been left out entirely. Bats, which are on this list of "forgotten" species, must be included, as they are essential UK Indicator and Keystone species, meaning they play a vital role in ecosystems. The strategy must also ensure that all 400+ species are considered when evaluating its success. If any species are not benefiting from LNRS actions, this will highlight gaps that need to be addressed.
- It is very disappointing that bats are not included. They are a key indicator of biodiversity and play an integral role in the eco-system. They urgently need protection given the human caused destruction of their habitats.
- This only mentions a small subset of 'priority' species requiring bespoke measures, extra to habitat interventions. The longer list of threatened species in GM, agreed for LNRS benefit after many weeks of investigation, has been completely omitted. Bats, which are included in the omitted long list, must be included in the LNRS as key UK Indicator and Keystone species'. The strategy must make clear that ALL those 400+ species will be assessed in reviewing its effectiveness, and any not enhanced through LNRS action will help highlight shortfalls in the strategy
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- I agree - but consideration to the long list of 400 species is critical to nature recovery, rather than actions being myopically focused on a short list
- This only mentions a small subset of 'priority' species requiring bespoke measures, extra to habitat interventions. The longer list of threatened species in GM, agreed for LNRS benefit after many weeks of investigation, has been completely omitted. Bats, which are included in the omitted long list, must be included in the LNRS as key UK

Indicator and Keystone species'. The strategy must make clear that ALL those 400+ species will be assessed in reviewing its effectiveness, and any not enhanced through LNRS action will help highlight shortfalls in the strategy.

- You are missing all UK Bat species, these species are protected under the Habs and Species regulations 2017 and schedule 5 and section 9 of the wildlife and country side act. I assume this is an oversight by the LPA. However I note GCN and Badger are also not included, which fall under similar legislation. The legislation has not been removed and these species occur within Greater Manchester, the fact that they have not been included shows a clear lack of foresight and knowledge, these species are indicator species for habitats such as ancient woodland, functioning ecosystems, priority ponds ect. I would like to know the reasoning behind their removal. There is also a worrying precedent set within the document "Install or enable more accessible homes for birds and bats on and around farms and rural buildings." Bats do not solely use rural areas, and this implies that developments urban areas will not have to provide suitable resting places for these species, or habitat to provide stepping stones habitat or corridors.
- Brownfield insects is a very small list considering their importance.
- This only mentions a small subset of 'priority' species requiring bespoke measures, extra to habitat interventions. The longer list of threatened species in GM, agreed for LNRS benefit after many weeks of investigation, has been completely omitted. Bats, which are included in the omitted long list, must be included in the LNRS as key UK Indicator and Keystone species'. The strategy must make clear that ALL those 400+ species will be assessed in reviewing its effectiveness, and any not enhanced through LNRS action will help highlight shortfalls in the strategy.
- Bats and other important species have been completely missed off the long list in the consultation in the local area. Bats are incredibly important keystone species, biodiversity indicators and free pest control, to name a few of their attributes. This only mentions a small subset of 'priority' species requiring bespoke measures, extra to habitat interventions. The longer list of threatened species in Greater Manchester, agreed for LNRS benefit after many weeks of investigation, has been completely omitted. Bats, which are included in the omitted long list, must be included in the LNRS as key UK Indicator and Keystone species. The strategy must make clear that ALL those 400+ species will be assessed in reviewing its effectiveness, and any not enhanced through LNRS action will help highlight shortfalls in the strategy.

- Agree as the vital species are cited which includes the black poplar which lines Ryebank Fields. Essential tree line the
- The specific action "Protection from predators and livestock using fencing or other exclusion methods." for Mountain Hares is unrealistic and unfeasible and we would recommend its removal from the list of actions. The species group "grassland ground-nesting birds" is a strange grouping as those species do not share the same habitats; they don't all nest on "grassland". Dunlin and Golden Plover are linked much more closely to upland blanket bogs and wet heaths rather than grassland. The proposed actions for that species group are not applicable to a number of them and there are a lot of potentially more beneficial actions for some of those species that are not included. This list of species being grouped together should be revised and actions more specific to each species should be proposed.
- We do in fact agree that these are the right species priorities but again needed to select disagree in order to provide comments. We would like to see more reference to controlling INNS in relation to species. As well as water vole and black necked grebe, INNS can impact on willow tit, hedgehog, slow worm, urban birds, migratory fish and farmland birds and are a major threat to all species diversity and particularly those in urban areas. We would like to see in the Principles section on p. 35 the additional need to consider impact on species under the first Principle: Ensure that habitat restoration and creation proposals occupy suitable sites and are not to the detriment of existing or other quality habitats, or vulnerable species, by following existing principles (example: 'right tree, right place, right reason'). Ultimately, this requires using this strategy as a starting point and then undertaking site-specific assessment for what works best on the land and what species it is important for.
- Comment: Mountain hare measure re fencing; The main factors affecting mountain hare populations are not known for certain, but the main threats appear to be cold winters, hot summers, habitat availability, road mortality, disease, possibly culling and predation locally. Therefore the first measure feels inappropriate as livestock aren't a threat, and fencing on moorland is likely unacceptable and impractical. Also unsure what 'other exclusion methods' are? Predator control may help but is unproven, contentious and, if deemed appropriate should be properly targeted, but main priority for predator control is for key moorland bird populations not mountain hare. Suggest this measure is removed. Main beneficial actions can be found here:

[https://www.researchgate.net/publication/359617668\\_Highest\\_densities\\_of\\_mountain\\_hares\\_Lepus\\_timidus\\_associated\\_with\\_ecologically\\_restored\\_bog\\_but\\_not\\_grouse\\_moorland\\_management](https://www.researchgate.net/publication/359617668_Highest_densities_of_mountain_hares_Lepus_timidus_associated_with_ecologically_restored_bog_but_not_grouse_moorland_management) Comment: increasing recognition of the importance of the upland population in the Peak District, therefore need to add blanket bog restoration or restoring the hydrology of the moorlands as a key general habitat action. Comment: ground nesting birds; some of the species listed use different habitats for different purposes, so safeguarding and appropriate management of foraging sites is also an important measure. Comment: Disappointing not to see any plants or invertebrates suitable for translocation or reintroduction.

- Why has the longer list of threatened species in GM, agreed for LNRS been completely omitted. Bats, which are included in the omitted long list, must be included in the LNRS as key UK Indicator and Keystone species'. The strategy must make clear that ALL those 400+ species will be assessed in reviewing its effectiveness, and any not enhanced through LNRS action will help highlight shortfalls in the strategy
- Only found a short list, links just take you to introduction
- I mostly agree, however, urban birds should include House Sparrows and Starlings.
- This only mentions a small subset of 'priority' species requiring bespoke measures, extra to habitat interventions. The longer list of threatened species in GM, agreed for LNRS benefit after many weeks of investigation, has been completely omitted. Bats, which are included in the omitted long list, must be included in the LNRS as key UK Indicator and Keystone species'. The strategy must make clear that ALL those 400+ species will be assessed in reviewing its effectiveness, and any not enhanced through LNRS action will help highlight shortfalls in the strategy.
- Beavers
- This only mentions a small subset of 'priority' species requiring bespoke measures, extra to habitat interventions. The longer list of threatened species in GM, agreed for LNRS benefit after many weeks of investigation, has been completely omitted. Bats, which are included in the omitted long list, must be included in the LNRS as key UK Indicator and Keystone species'. The strategy must make clear that ALL those 400+ species will be assessed in reviewing its effectiveness, and any not enhanced through LNRS action will help highlight shortfalls in the strategy.
- This only mentions a small subset of 'priority' species requiring bespoke measures, extra to habitat interventions. The longer list of threatened species in GM, agreed for

LNRS benefit after many weeks of investigation, has been completely omitted. Bats, which are included in the omitted long list, must be included in the LNRS as key UK Indicator and Keystone species. In the GM area, Soprano pipistrelles bats, Brown long-eared bats and Noctule bats, which are UK priority species, should clearly be named as priority species, especially now that the current Government threatens openly to ignore bats in planning developments (housing, road infrastructures, etc...). The strategy must make clear that ALL those 400+ species will be assessed in reviewing its effectiveness, and any not enhanced through LNRS action will help highlight shortfalls in the strategy.

- GMSF does not support protection of strategically important species as highlighted in ecological studies. How can this therefore be proposed as a strategy by the same organisations that are responsible for their demise
- I agree with the priority species EXCEPT why the complete absence of birds of prey, such as peregrines, sparrowhawks and hen harriers? These birds depend on the Greater Manchester uplands and SSSI's, but are struggling, as the RSPB and BOT can confirm. I also believe amphibians should be included, particularly toads. Lastly, swallows and starlings, whose numbers have severely dropped in the uplands in recent years.
- Whilst we agree with the species priorities, a long list of 57 species of birds was submitted through the LNRS Species Technical Group, of which 16 were identified as priorities. We are concerned about the omission of the other long list species and would request that these are included in the final version of the document. 45 birds species on the long list are were assessed as Threatened or Near Threatened under the second IUCN assessment of regional extinction for Great Britain (Stanbury et al 2021). If we are to halt the decline in species abundance in Greater Manchester by 2030, increase species abundance by 2042 and reduce the risk of extinction then it is essential that these species are referenced in the strategy and that habitat restoration and enhancement focuses on all the species on the long list.
- This only mentions a small subset of 'priority' species requiring bespoke measures, extra to habitat interventions. The longer list of threatened species in GM, agreed for LNRS benefit after many weeks of investigation, has been completely omitted. Bats, which are included in the omitted long list, must be included in the LNRS as key UK Indicator and Keystone species'. The strategy must make clear that ALL those 400+

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- This only mentions a small subset of 'priority' species requiring bespoke measures, extra to habitat interventions. The longer list of threatened species in GM, agreed for LNRS benefit after many weeks of investigation, has been completely omitted. Bats, which are included in the omitted long list, must be included in the LNRS as key UK Indicator and Keystone species'. The strategy must make clear that ALL those 400+ species will be assessed in reviewing its effectiveness, and any not enhanced through LNRS action will help highlight shortfalls in the strategy.
- Good to see swifts on the list. They can offer a real connection with nature to
- I DISAGREE BECAUSE OF THE FOLLOWING...May I point out that a list of 57 species which was compiled by the Greater Manchester Bird Recording Group and submitted for the draft Nature Recovery Plan has been omitted from the 88 page LNRS document. This to me is a worrying omission for the 57 Species are the measure of whether the aimed for recovery of this plan has or has not worked. Surely the LNRS is a REAL plan for the REAL recovery of nature in GM and as such must make a true effort in attaining and sustaining this recovery and not simply finding the easiest targets too attain and then signing off the document---leaving the nature in GM in much the same parlous state it's in now. Please insert this list in full and then go all out to attain a real outcome for the LNRS.
- We are a local group with links to Natural England and Lancashire Wildlife Trust. An important member of our Committee is REDACTED and experienced local wildlife and habitats expert who has recorded bird, wildlife and land use on the Mossland within these wards for the last 40 years. REDACTED commitment to the Mossland and its wildlife are reflected in this personal statement from REDACTED " Lowland wetland and mosslands (are my priority)...I visit and record wildlife out on REDACTED on a Daily

basis Volunteering for numerous organisations over the years...(I have) led groups out onto the Mosslands...have submitted decades of records to such as the REDACTED ....etc I hope to continue doing the same..." This enthusiasm for nature needs to be tapped and used. We also have a local councillor on our action committee. We are well placed to work with organisations to deliver enhancement and protections in our local area Cadishead and Lower Irlam Ward Higher Irlam and Peel Green Ward Both within Salford and part of Chat Moss.

## 20.To what extent do you think the priorities in the strategy are clear and easy to understand?

There were 369 responses to this part of the question.

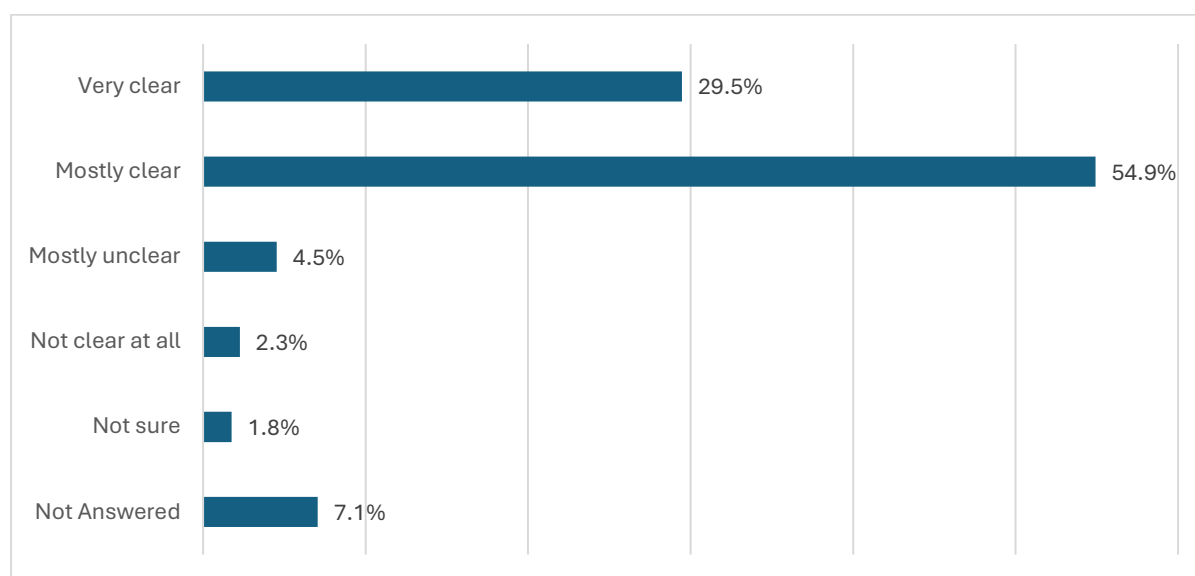


Figure 20 - Percentage of respondents that thought the priorities were clear and easy to understand.

Option	Total	Percentage
Very clear	117	29.5%
Mostly clear	218	54.9%
Mostly unclear	18	4.5%
Not clear at all	9	2.3%
Not sure	7	1.8%

<b>Not Answered</b>	28	7.1%
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Table 20 - Number and percentage of respondents that thought the priorities were clear and easy to understand.

## 21. Which of the priorities could you possibly help take action towards and how?

There were 394 responses to this part of the question.

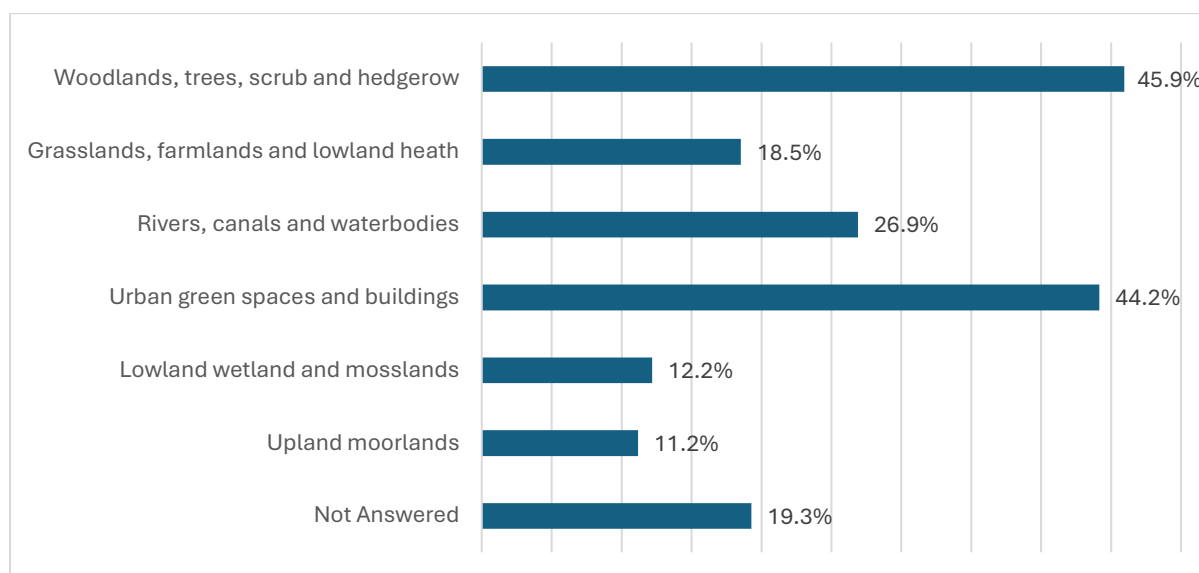


Figure 21 - Percentage of respondents that could take action toward each of the habitat priorities.

Option	Total	Percentage
<b>Woodlands, trees, scrub and hedgerow</b>	181	45.9%
<b>Grasslands, farmlands and lowland heath</b>	73	18.5%
<b>Rivers, canals and waterbodies</b>	106	26.9%
<b>Urban green spaces and buildings</b>	174	44.2%
<b>Lowland wetland and mosslands</b>	48	12.2%
<b>Upland moorlands</b>	44	11.2%
<b>Not Answered</b>	76	19.3%

Table 21- Number and percentage of respondents that could take action toward each of the habitat priorities.

## 22. Action that could be taken

There were 224 responses to this part of the question.

- Planting trees along my local streets and in my local green spaces, keeping my garden wild.
- I live REDACTED in Chorlton and REDACTED. Local citizens have cared for this land for 30 years since it was abandoned as playing fields by MMU. It is now one of the most nature rich areas in South Manchester. If Manchester City Council approve a planning application and cover these 10 acres with 120 properties it will make a mockery of all the work that has gone into the Nature Recovery Plan. Your team need to ensure that the requirement to 'protect and enhance' existing green spaces is a mandate for Councillors on every planning committee in the County.
- Having a garden with diverse plant species and absolutely no fake plastic grass
- Suggest you consult CPRE on your strategy if you have not already done so
- Manage woodlands to ensure the canopy isn't too dense. Monitor trees to ensure their healthy. Manage waterways by clearing rubbish and plant native along the banks to prevent erosion. Manage urban green spaces by planting native wildflowers, fit nest cups and Swift boxes to buildings.
- I am REDACTED. The group has always had the objective of helping Manchester City Council to implement, as much as possible, of the Chorlton Ees and Ivy Green Local Nature Reserve's Management Plan. The group undertakes such tasks as hedge laying, scrub control, grassland management and invasive alien plant removal (principally Himalayan Balsam). I am REDACTED. I am happy to be involved in any planned wild plant surveys.
- Working with local groups to improve the local environment and promote joining up of habitats.
- I'm already working to protect an existing urban wildlife and environmentally rich space by fighting the development of Ryebank Fields in Manchester unfortunately supported by the Council. Too much urban green has been lost under the development strategies of this Council who build apartments for families in areas without access to green space and play facilities. I urge the council to look at the example of cities such as Madrid where the green infrastructure of trees water and parks makes this kind of living tolerable.
- The problem here is that we need to change the behaviour and attitudes of our residents and communities. One person can only do so much. And when you do and your hard work is destroyed it is demoralising. So you don't do it again. We need proper

investment. Leadership and management to drive this forward. But that requires resources

- I am involved in various projects where I live: Green Chorlton, Chorlton Community Garden, Chorlton Plant Swap and Gardening Advice
- As a friend of my local woodland we aim to enhance biodiversity and campaign to stop sewage outflows into the stream. I will continue with this work and encourage others to become involved.
- MEMBER OF **REDACTED** . WORK TO REMOVE INVASIVE SPECIES, GENERALLY IMPROVE/RESTORE HABITAT. COMPILING LIST OF SPECIES IN **REDACTED**, HAVE BIOBLITZS TO ENGAGE COMMUNITY. MEMBER OF **REDACTED** HELP MAINTAIN THIS URBAN PARK FOR WILDLIFE; **REDACTED** FROM MOWN RYEGRASS. DISAPPOINTED TO SEE THAT NEITHER AREA IS ON MAP FOR GREENSPACE CONNECTIVITY. HOLD BUGHUNTS FOR KIDS ON GREEN & ENGAGE LOCAL COMMUNITY. **REDACTED** MONITOR WATER QUALITY & IMPROVE ENVIRONMENT.
- Volunteering in working parties
- as I am elderly i would have to consider very carefully what I offered
- Preserving local trees and woodland and gardens, joining in local groups.
- Wigan Council could initiate a comprehensive Urban Forestry Plan concentrating on increasing tree cover. This plan would involve mapping existing green spaces, identifying suitable areas for new trees and hedgerows, and prioritising locations based on their biodiversity value and community needs. Collaborating with ecologists and urban planners will ensure that native species are chosen, maximising benefits for local wildlife.
- making my own garden more nature friendly and this is what is missing in a far more direct manner. I wish fake grass was banned. It's massively destructive and I'm not sure this message is getting through.
- Through work I am allowed to have volunteer days, if projects were created where I could volunteer to help increase the biodiversity in these areas then I could help out.
- It would be useful to provide guidance to residents about how to improve their gardens for the benefit of wild life.

- We can help across all the areas. We are already creating all of these habitat types and are working in the most urban areas where people have less access to decent green spaces.
- As a volunteer in Scouting you facilitating volunteering days with resources could improve many areas, whilst counting towards earning badges.
- Keep part of my garden bird and insect friendly by keeping it natural.
- In the Wigan and Leigh area there are a vast number of flashes and waterways with barriers blocking or hindering access for the disabled. There should be no barriers at all as the Police are enforcing their "operation handbrake" scheme with great success. After all, whatever happened to the "access for all" scheme.
- I have been taking action for past 28 years in a LNR. Volunteers need a very good support system with training (conservation tasks, risk assessments, use of equipment, how to work with council officers, organise events and complete a project from start to finish and first aid) and help with finding and applying for grants. More green space staff are needed. Until recently in Stockport, my group/LNR shared one overworked Countryside Officer with more than 40 other groups/green spaces, together with a Neighbourhood Officer who rarely, if at all, made contact.
- This is quite difficult to answer. I'm not really equipped to be of much help. I think it involves not littering of these areas which is something I already do anyway taking part in community work?
- We have planted an Orchard Garden in our local park and have installed a native hedgerow there as well so we are now looking at ways to finance the maintenance of this space. We are also looking at other areas we can be involved in tree and hedgerow planting.
- Already a volunteer with friends of REDACTED and have helped to plant and maintain various new trees in the park.
- I'd like to create employment opportunities for young people in GM by developing courses at local colleges that teach environmental skills needed to tackle these priorities. How can it be in a climate emergency that no college (16-18) in GM teaches any of these skills?!
- I work for a small family run Landscaping business which specialises in soft landscaping and regenerative planting. There are minimal grants for our customer base (schools/ offices/ retail parks) and I strongly believe they are all prepared to re-green their

concreted spaces. Schools especially are lacking in FUNDING to help keep their green spaces green and instead look at cheap, low maintenance options to help balance books. Children are very keen to be outdoors and feel a part of a positive change towards nature. They would be a good start for long term wins.

- I am not in good enough health to do any physical conservation tasks but I would be happy to help with education.
- I'm not sure. I have no experience in anything like this.
- We are eradicating mink from the canals and rivers around Marple now. This is all part of a nationwide initiative to rid England of mink entirely in 5 years led by <https://www.waterliferecoverytrust.org.uk/> They are all invasive, American mink. There never were any native mink here, unlike Europe. We are part of it and it would be great if the rest of G Manchester joins in. This needs to be mentioned in your plan. This is now out in the open. The Times newspaper ran a large article on it recently. We are already seeing results in Marple
- Volunteer planting shrubs and trees and maybe do a charity event in the town, people pay to take part and that way theres more money to plant more trees and plants.
- NO to cycle lanes...waste of tax payer money!!
- Protect creatures such as hedgehogs 🦔
- As a charity, our organisation seeks to actively manage areas of degraded land in Oldham. Through active management many of the target benefits can be realised.
- protect what we already have within the conurbation. Where I understand the creation of new green space, we cannot allow developers to pave over the existing greens space and claim a false carbon neutrality by creation of some window boxes and grass verges. Woodlands need protecting. Is it be acceptable that in GM a developer can buy land that contains woodland protection order(s) then on success of a planning application tear down the trees? This Plan should dovetail with the Place for People Plan to protect the existing natural infrastructure in a similar way that we do with listed buildings.
- There are many golf clubs around the Greater Manchester area, these clubs should be incentives to introduce wildlife and wild areas, stop using insecticides and encourage working with nature, eg encourage owls to nest, to keep down moles. I'm sure you know lots of ways clubs can help nature but they need help. greenkeepers are under budget pressure to produce the best course with least amount of money. The courses could also help with wildlife corridors

- I live in a suburban area, as do most of the population - can assist with tree planting in area, people who live in more rural areas are better able to help with bogs, forests and moorlands.
- As a keen walker I will rebel against any form of restrictions because of this. I believe the area has significant other topics as priorities.
- I live between 2 parks REDACTED which could be hugely improved for wildlife with the help of the ground staff if they could be retrained to understand the needs of the local wildlife and how they can contribute. At present their priorities are to make everything neat, to cut everything to the ground.. If we suggest any alternative management, there is always an answer why it can't be done Please retrain our ground staff to think differently and to learn to love nature and the importance of what they do.
- Make adjustments to my garden to help biodiversity. Volunteer my time to help plant trees. I sincerely hope the city council will look at the prospect of restoring the Stockport Branch canal between Clayton Junction and Debdale Park, Gorton. This would hugely improve the quality of the neighbourhood, increasing access to wildlife and peoples' opportunity for leisure and lead to increased tourist opportunities around Debdale Park, with the possibility of the provision of a new marina and waterside cafe.
- All priorities are very wishy washy; what do they mean in practise?
- Our 3 habitat banks are designed to maximise the biodiversity potential of the land. Their primary purpose is to deliver biodiversity uplift by creating and enhancing habitats that contribute to nature's recovery. The habitats respond to the landform, soil, hydrology, geology and are located close to habitats of existing value. They are contiguous and complimentary to these habitats and consistent with Lawtonian principles. We believe that they should be included in the opportunity areas of the map.
- Using community alliances, social housing providers, and VCRSE sectors to develop existing green areas, support applications to funding streams. Designate himalayan Baslm as invasive, and require landowners to deal with it. Local golf course ignores its hedgerows & wild areas & allows himalayan balsm to run rampant. Litter picking groups, guerrilla gardening, adoption of traffic islands by communities.
- As a community interest company we get involved in delivering a range of community based environmental projects.
- I am willing to attend voluntary work days.

- Member of local Inner city climate action group which already manages local green spaces - need to enhance this and learn more about how nature can help us reduce air pollution
- I work with communities in North Manchester where there is already a lot of urban green space and multiple canals and rivers. I work to encourage residents to take an active role in protecting and improving these spaces and help them see the benefit it has to their daily lives and to climate adaptation
- There are many opportunities in Trafford to restore substantial areas of mossland. I can assist but need further technical support.
- Development of Forest School spaces for disadvantaged children
- All of wildlife is suffering and in decline. By destroying and not protecting habitat we are messing with the ecosystem which will have untold consequences. It is our duty to protect wildlife and put wildlife and natural habitat at the heart of every decision the council makes.
- Development of a nature friendly garden and local area without pesticides or herbicides. More bird and insect houses. Encourage neighbours to do same.
- I've tried my best to stop a planning application being granted in my area REDACTED which will see the loss of open space within a highly urbanised area, where people don't have gardens and have limited access to green space. The land is not brownfield and the community could really benefit from this space being returned to an area of play for children. The land has a covenant that is for the benefit of children - this has not been considered by the planning officer. We will also lose a REDACTED that is hundreds of years old. Application reference REDACTED
- If engaging the general community and local sideline groups to help restore areas
- I'm trying to help organise REDACTED in the summer. However, I can't help thinking that we need a change in thinking, we need people to recognise how they are 'nature' and that they depend on nature, linking in with education and faith groups. What about the benefits and connection with places like people's own gardens, allotments, golf courses or sports fields. I wonder how we are going to inspire people to take action in their own 'sphere of influence' - most of the strategy is about action in places where they have little influence.
- If the majority of people tended their gardens to make them wildlife and pollinator friendly, and not use any herbicides or pesticides, this would absolutely improve the

outcome of all wildlife and bees etc. I do the above as well as having wildlife pond and bird boxes. The council need to stop using weedkiller as this is completely at odds with this strategy. It doesn't make sense.

- I am a REDACTED. Also hold a REDACTED from Edinburgh Uni. Extemporaneous environmental research and management.
- Happy to volunteer to help out in any way
- I work as a REDACTED for an LA REDACTED and can create and support opportunities.
- It is important that current green space land is not used for development & this should only be allowed on brownfield sites & spaces but this should then incorporate more schools, doctors & dentist services that are constructed either on these sites or close by or even in existing properties that are redundant & have had no significant use for some considerable time.
- As a volunteer with community action groups focused on introducing and maintaining green spaces for local residents to get active.
- Would engage in local voluntary group to help maintain, tidy waterways. Would like to see a clear water path running along the Irwell River into Manchester city centre. I fear this is too late to increase access/greenery along some of the city centre water routes.
- I will continue to campaign to protect my local peat moss. Unfortunately under the Places for Everyone Plan, this peat moss will be destroyed. This makes a mockery of this nature recovery strategy. The same authorities who are putting this recovery strategy together are destroying the moss lands/wet lands that it purports to want to restore and enhance. I don't believe in this recovery strategy. The only way it can be credible is if the GMCA stop the unnecessary development of peat mosses and wetlands and do as they say in this strategy, restore and enhance them instead.
- I have planted hedging at a community garden. As a teacher I developed a rooftop garden as well as helped increase the biodiversity of the school grounds by planting trees and building habitats for insects alongside wildflower planting.
- by continuing as a local greenspace volunteer working under guidance to maintain and improve the grassland, farmland and lowland heath of REDACTED in Hyde
- Monitoring pollution and engaging in kick-sampling

- Hedgehogs need wide areas not just corridors to travel in order to survive, so much vital space has been taken by housing and by enabling passage through gardens this would help hedgehogs massively
- Elton reservoir holds breeding populations of willow tit, lapwing and skylark so it's unclear how Bury council will protect these given they are looking to build 3500 houses on the site
- Continuing work with park groups.
- I plant for pollinators and don't mow my grass for most of summer. I can encourage others to do the same.
- Open to any if sufficient guidance, groups, and leadership is available due to lacking experience.
- I help and cofounded a local friends group doing this but we need to be funded, mainly for path improvement for people
- Becoming involved in local clean up schemes and helping with conservation on a voluntary basis.
- Continue to manage my garden for biodiversity. However, it is not clear how the strategy will achieve this overall. Access to a car can be a barrier to gardening, this could be addressed through the strategy.
- Community tree planting sessions. Look into the Miyawaki Method to increase carbon sequestration and reduce effects of ASB due to dense planting (if kids can't get into the micro-woodland, they won't rip up trees/set fire to them). Many local authorities are looking into it and some are setting up experiments to compare to standard planting methods.
- Management of urban areas through community involvement.
- All of them need support, a massive amount of jobs need to be created to manage the decline in wildlife and to help restore soils etc.
- I would be prepared to do specific surveys in the south-eastern quarter of the county. I already submit records for a wide range of species, especially invertebrates.
- Collection and analysis of recording data on invertebrates, especially Diptera such as craneflies, hoverflies and soldierflies.
- Helping to clean local waterbodies
- By fighting planning proposals for housing which will exacerbate surface water run-off, which will destroy the only lowland wetland grassland SSSI /NNR in Greater Manchester

- With Greenspace officers, we will remove Himalayan Balsam in the woods by the path between REDACTED. We will clear from the path overgrowing plants. We will plant spring bulbs, prune fruit trees and thin out surplus saplings to allow broadleaf trees to mature. We will work with the water trust to survey the aquatic life within the river, and report blockages and damage where appropriate. We will organise and lead community litter picks and may survey the birds, insects and plant species, making information available to the community.
- "I work at REDACTED & I'd love to restore some of the area by our river into a community gardens that benefit native species. The land next to us here: REDACTED is owned by a private company. I'm looking to explore the best way to approach them, perhaps someone in our organisation has a working relationship with them. Our organisation already works with community groups such as MUD, so I feel the ingredients are there to explore this. I'd also love to do it here REDACTED & here REDACTED
- I am a local councillor in a mostly urban area near large water courses. I sit on REDACTED and on REDACTED for developing its local plan. I'm concerned about biodiversity generally, but also resilience in relation to flooding and the council's targets for increasing its housing stock. The need to identify more land for building could threaten measures to improve biodiversity and resilience. I could speak up about this at council and committee meetings and working groups
- The restoration of the Stockport Branch Canal from the Ashton Canal to Debdale Reservoir gives a tremendous opportunity to develop a wildlife corridor within a short distance from urban communities which are in need of green spaces. The corridor can also be used as a pollution free, safe cycle and walking route. Opening up this historic canal could bring much needed healthy leisure opportunities along its route and be deemed an interesting visitor and educational attraction whilst enhancing the local economy.
- Carrington Moss is a 1,000 odd acres of mostly restorable degraded raised peat bog and has been air brushed from your report altogether. Quite incomprehensible. Before considering restoring nature we need to stop destroying nature.
- I have volunteered with City of Trees and would do more of this. I would also be interesting in volunteering with e.g. the River Trust. I will continue to leave some of my

garden as a wildflower meadow & keep the remaining grass longer + look at planting at least one more tree.

- Through planning decisions and urban design negotiations
- By taking part in river and grassland biodiversity surveys.
- Through my job I can undertake projects that engage local communities and involve nature. This could involve creating volunteer opportunities or sharing specialisms from colleagues in nature based roles such as gardeners and rangers with those wanting to improve their local area.
- I carry out a range of bird surveys each year for different organisations, mostly breeding bird surveys but also help with winter farmland bird surveys and occasionally Wetland bird surveys, the records of which I or others submit to the REDACTED or to the REDACTED for monitoring purposes. I have been carrying out bird surveys of this kind and submitting the records for many years. I want to continue doing so. I also volunteer helping with tree planting from time to time, e.g for the Woodland Trust on the REDACTED and for City of Trees on various sites.
- Our group has activities focusing on supporting nature including maintaining a community orchard and raised beds, planting and growing in open spaces, caring for a hedgerow and running bat education events beside the river Mersey. We do this through volunteering alone and so support in organisation of projects, 'recruitment' of new volunteers, and training and facilitation of new activities would allow us to have a greater impact. We would welcome details of how councils will be suitably funded and staffed to work with local groups and empower them in the activities that matter to them.
- Growing a more diverse and healthier garden, helping with conservation projects around my local fishing pond.
- You could organise groups of volunteers to help clean up local canals etc
- Manage invasives in local woodland and landscapes.
- More volunteering in my local park - join the Friends of the Park group. Citizen science - monitoring the invertebrates in the river. Removing Himalayan Balsam on the banks to reduce erosion and promote biodiversity. Encouraging other people to get involved. Get involved with City of Trees - find out more about how they maintain the trees already planted in the park, learn about right trees/ right place, plant trees. Join local Civic Society - take part in campaigns to improve the Urban environment eg street trees, wildflower verges, community involvement.

- Strongly support the inclusion of urban birds particularly swifts, I'm sorry I don't have the energy to read all of this but hope elsewhere you will include the need for swift bricks and nests to be included in the planning process and also for strategies to increase insect populations eg stopping using weed and insect killing chemicals like glyphosate
- I already lead on greening of a traffic island by some local shops as a volunteer, formerly close grass now diverse range of plants with blessing of council environmental services
- By opposing the planning system's continuing apparent disregard for the preservation of existing woodlands, trees, scrub and hedgerow, e.g. at the proposed Dakota Hotel site, North of Manchester Airport.
- Tree planting with local volunteers
- All of these habitats exist within a short distance (200 metres - 5K) of my home and several nature based and environmental groups that I'm actively involved with are keen to see SMBC's detailed plans for LNR in our area. I and many of my colleagues are already involved in green community projects within our area.
- I am a member of REDACTED. We are working to increase the nesting sites available across REDACTED for swifts by erecting swift boxes on the houses of local residents, and by increasing awareness and knowledge about swift conservation.  
www.southmanchesterswifts.co.uk. REDACTED a non-for-profit social enterprise based in Salford, developing and producing music festivals and residencies. I am keen to develop more creative projects to increase awareness and engagement with nature across Greater Manchester REDACTED
- By promoting Swift Bird Boxes and Bricks on buildings which are a Universal Bird Brick preferable to Sparrow Terraces as they welcome both Swifts, Sparrows and other building dependent bird species. By promoting the Protection of Swift and House Martin colonies. By engaging people with nature on their doorstep.
- As mentioned earlier, I am a huge proponent of an alternative idea to urban spaces. As mentioned before, the interventions would be low maintenance, resilient to the effects of climate change and would have huge biodiversity benefits, ticking all the habitat priorities and actions laid out in the draft report. I have experimented with these interventions myself on the school grounds that I work on, as part of the national education nature parks programme, I would be happy to show these to anyone interested.

- I am a chartered forester. The broadleaf planting is beneficial in the lowlands where good quality timber can be grown and where timber isn't best suited, we should still be practising sound silviculture. Along steep gullies, broadleaf planting would be well suited and in small plantations where economically commercial blocks don't add up. However when a large piece of land becomes available, commercial forests should be the main aim. When carried out to UKFS, most biodiversity and people objectives will be met. This is good for the landscape and future generations. to much more to list...
- I monitor the quality and riverfly at REDACTED - these streams flow into the REDACTED so I feel I am already assisting. I have a sub-urban large garden which I garden for wildlife and I will continue to do what I can. I am chair of REDACTED and encourage our members to get involved in wildlife activities (we monitor the flora and fauna of REDACTED and report to GMEU). As an organisation we will be working with the Marple Civic Society when it is Stockport's turn to produce a LNR strategy - I am our contact with REDACTED
- Monitoring of damage due to unauthorised tipping
- Our own biodiversity plan intends to expand previous programme of open space and biodiversity improvements from wildflower meadows, bulb planting and natural Meadows (leaving areas uncut) to an agreed strategy around improving and enhancing the appearance of our natural spaces, this will be enhanced by our current partnership with the National Trust that will make suggestions around this and how we maintain our open spaces in the future.
- Personally, my garden is being changed to encourage wildlife connectivity e.g. hedgehogs - but, due to the ever increasing number of new houses in the area, and the fact that the police and council will do nothing about speeding traffic (e.g. introduce speed ramps with tunnels under for wildlife - controls speed + saves wildlife) - they invariably get run over - it would be better to capture the hedgehogs and lock them in my garden - not helping connectivity. Address root cause through innovation = cure 2 problems with 1 solution.
- I live within 20 metres of a Greenspace Corridor woodland and grassland, but local developers are scheming with planning officers and hoping an appeals board will allow these spaces to have three-storey houses built on them. It is vital, once a space is identified with tonnes of evidence as to why it should be protected as cited by a council office, that another office doesn't come along hand-in-hand with a developer to overrule

this protection. It's wilful, shameful and shreds all trust in Greater Manchester and local authority promises to its citizens.

- We remove INNS, manage local LNR, SBI & park. Footpaths. £17k pa for Bolton, is a joke. REDACTED. Funding is a massive issue. If Friends had a budget we could achieve loads of this. Nonetheless we have removed 90% Jap knotweed & H. balsam with Bradshaw Fly Fishers & repaired 80% paths & keep others open by private funding. We want to create country park & extend LNR from Jumbles dam to Firwood fold & Harwood Vale & need support & funding. Our private green belt needs protection from building
- All of the above priority habitats exist within our area and some members are already involved in existing nature recovery projects. We recently brought together a number of greenspace "friends" groups, naturalists, citizen scientists, canals, rivers and woodland volunteers under the banner "Greening Marple" to discuss how we might work collaboratively on recovery projects once the GMCA strategy is adopted and SMBC produce their own plans for our area. We're very enthusiastic but at present short on detail as regards the role that community groups will actually play in the recovery process.
- Protect Ryebank Fields in Chorlton/Trafford- madness that it is being built on alongside this strategy! A complete and massive contradiction. More housing for brownfield, not greenfield sites.
- Helping with communal gardening / food growing
- I would be keen to connect with local groups looking to green the local environment
- I can volunteer my time to work on certain areas and to record the species seen.
- I am an environmental professional working in the area and am interested particularly in expanding access to national government schemes on farmland.
- Maintaining an inner city garden designated for its residents
- "Offer support in design and marketing to help communicate with locals or stakeholders that need convincing. Volunteer time for physical labour.
- I work in REDACTED where I am developing the REDACTED. The centre plays a very important educational roll for the Manchester community, allowing visitors to understand the role of different plant species from diverse geographical regions. Outside the REDACTED many of the trees are poorly maintained and the overall plant diversity of the park is poor. Firstly, the council needs to start putting it's park staff on accredited

horticultural training courses so that they become true gardeners and not simply "hackers n slashers".

- We strongly believe that connected green corridors are central to nature recovery and that access to nature is essential for wellbeing and to promote public understanding of the importance of nature recovery thus gaining support for measures necessary to implement the strategy. We want to help to create green routes throughout the various habitats of the city region.
- None of the above is easy without good leadership from Ranger staff from the local authority or charities that they sponsor. As a REDACTED I do this in my own time and with materials from the Bat Conservation Trust. It helps enormously to be insured via Stockport MBC to do this
- Regular monitoring and recording of key species. Making my own garden more wildlife friendly.
- I live within an urban green space - I will ensure that the space is kept litter free and protect it from threats such as fly tipping and encroachment. I will help to ensure buildings are maintained.
- By volunteering - I have done already in Greater Manchester.
- I live on the edge of REDACTED where an area of meadow & trees down REDACTED is under threat from planning consent to build houses. This consent should be refused on environmental & access grounds as it contains abundant wildlife including Deer, Badgers, Foxes & Song Birds.
- I am willing to volunteer to help protect and enhance in these areas. What I find difficult is having the information of working projects soon enough and also finding projects that are not a great distance away
- Creation of community green space as biodiversity rich local wildlife areas especially where they can help connect other green space wildlife areas
- Sport England promotes Active Design, to facilitate environments that can help people to lead more physically active and healthy lifestyles and to encourage physical activity- such as walking, cycling, sport, exercise, children's play, outdoor leisure, that maximises opportunities for people to be active. Further advice can be found here:  
<https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design>. Sport England encourages discussion with Greater Manchester Moving who would be happy to advise you further in these matters.

- As a very active canal restoration society we are well placed to support the campaign for improvement of blue and green space for wildlife and for human amenity. We already engage in several related activities and will use the revised strategy as a framework for working in partnership with like-minded people and groups to further these aims.
- Greenfield land Ryebank Fields Chorlton should have been included into the Nature Recovery Consultation. This urban greenfield is part of the Manchester wildlife corridor that links Longford Park Stretford with Scott Avenue allotments Chorlton and the Tram corridor through Grt Manchester. Ryebank Fields should not have been omitted from this consultation. Local residents are determined to prevent MMU developing this greenfield site, home to a wide variety of species.
- See our separate letter emailed to the team. Shooting provides the incentive to invest in the extent and condition of these habitats. Woodlands require management of herbivores, especially deer and grey squirrel. The strategy needs to address this. Manged burning is an essential tool for provide heterogenous habitat mosaics and to manage the fuel load - the critical factor in managing the risk of wildfires. We hope and expect the delivery phase will recognise this. The benefits of game shooting providing additional hedgerow and cover crops provides substantial value for nature recovery.
- By not replacing my garden grass with artificial grass or paving over. By leaving my garden to grow wild to help insects.
- As I am now rather old, sadly all I can offer is to continue to do everything I can to keep my garden as biodiverse as it currently is, thankfully thriving with wildlife and regularly visited by two of your priority species, the willow tit and hedgehogs. And try to do my best to ensure our neighbourhood, which is also rich in biodiversity, is kept safe and thriving for the foreseeable future.
- Creating a wildlife friendly garden
- I am using gravel in my garden to reduce water run off , Planting to encourage insects , not using chemicals and pesticides when gardening. Not littering my streets.
- At Boggart Hole Clough, North Manchester, we advocate, promote & campaign for proper nature conservation management of the Ancient Woodland > please see numerous PDFs on our website > <https://boggartholeclough.wordpress.com>
- I am already involved in the campaign to save Ryebank Fields. A group of volunteers from the local communities of Manchester and Trafford take care of the fields.

- Ryebank Fields, REDACTED is an existing beautiful green field full of trees, grassland, scrub and wildlife. It is under threat as MMU are planning to sell to create 120 homes (not needed as Manchester already well above target and Old Trafford will have 5000 more). This was public land and is very loved by the community.....we must leave it as a thriving green space....the only wild space so close to the city centre.
- I am taking action towards safeguarding an essential urban green space. Ryebank fields is one of the few wildlife-rich areas in Manchester and a registered greenfield site. I do not even live in the community nearby. Still, I am taking action to protect the existing green space we do have left, rather than spending years building up the same biodiversity somewhere else.
- Creative design, artist contributions gardening and community engagement
- Save Ryebank Fields. Ryebank fields has rich wildflower meadows which support pollinating insects. The large trees at the fields are used by migrating birds as a navigational waymark and provide habitat for large birds such as sparrow hawks. They should be protected.
- Stop development on Ryebank fields in Chorlton. Make sure they are protected against development to maintain valuable green space.
- This local nature recovery strategy is marvellous and I support it wholeheartedly. I live near some of the land you have highlighted in your report (Faligne Fold). I see deer, fox, badger and whole host of birds and other wildlife daily and I am frantic to save this area. A planning application is currently under review to build 4 luxury homes on this land. We are fighting with all our vigour to protect this beautiful space. We hope you can help us protect this beautiful slice of nature and help us recover it back to beautiful, natural woodland.
- I would like to see targets for more green walls and green roofs which can be monitored at local authority level, to increase biodiversity, improve air quality and visual amenity. I'd welcome community owned renewable energy schemes supported by GMCA. Solar farms along road verges, on grazing land or floated on ponds, with innovative energy solutions such as battery storage, green hydrogen and more active travel, can help combat the climate crisis, and help raise awareness of the importance of nature recovery and encourage people to use and find enjoyment in a flourishing environment.
- South Manchester Swifts have already installed over 100 nestboxes to replace lost breeding opportunities for swifts and we will continue this work.

- However, we are also very concerned about insects as the lack of these also has a very detrimental effect on swifts' survival. Nearly every area of nature improvement will help insects - clean waterbodies, grasslands and hedgerows.
- Based in an urban area we are trying to spread the word on gardening for nature in order to provide insect habitats in small, even very tiny spaces. We've also made a leaflet about swifts and insects.
- Please protect the green space behind FALINGE FOLD (ROCHDALE) - this is a vital urban asset for walking / nature trails / fresh air / mental wellbeing.
- I am really putting all my efforts into saving the beautiful natural green space - re-wilded over a 30 years. This should be a priority for the strategy. Many local residents are working together to prevent this existing wild spaces being built on
- Help to protect the land at the back of Falinge fold. The meadow is home to so much wildlife and such an important part of the local area. It's used for walking, nature trails, bird watching and so much more. The land is currently under threat and the loss of wildlife and green space would be devastating.
- Story is committed to delivering high quality development containing dedicated areas of open space and the inclusion of landscaping that encourages natural habitats to flourish. The company recognises the importance of maintaining the favourable conservation status of protected species and enhancing the biodiversity value of the areas in which it builds. Developments include a range of features to support wildlife and enhance biodiversity including: bat and bird boxes, wildlife corridors and grassland, hedge and watercourse creation/enhancement and sustainable urban drainage systems.
- I am a volunteer at REDACTED. We are very keen to see upstream flood risk reduced. This would help maintain biodiversity in the park, which is used as a flood basin by the EA. Flooding creates major damage to habitats and brings in himalayan balsam and Japanese knotweed.
- Be part of the MFT green spaces strategy to increase the green spaces within the hospital sites by planting more plants and trees.
- Willing to help clean our canals which are so polluted with rubbish.
- Help rewild Ryebank Fields so that it is a better sanctuary for urban wildlife.
- As a park volunteer I'm involved with urban conservation and have participated in greenspace and walk/cycle forums.

- I share your vision but in my engagements with councils and their contractors I have directly encountered contrary policy and practice, and at times open hostility to nature recovery - especially regarding mowing regimes and transport/access policies.
- You will need to replace "may" and, "should" with, "will" and, "must" if this is to be more than, at best, wishful thinking or, at worst, a big tin of greenwash for the benefit of the evasive. This needs teeth.
- By volunteering with local Friends Of and Community Woodland Groups to plant trees and hedges and maintain and manage them. By helping to create and look after meadow areas in local parks and green spaces. Working with my neighbours to look after the grass verge on our road and develop it into a wildflower verge. Managing my garden to encourage wildlife and helping/advising others how to do the same. Becoming a REDACTED for the REDACTED and helping to monitor water quality on my local river.
- Rated unclear as, while the strategy highlights opportunities for improvement, no process is mentioned to ensure core sites are protected or beneficial action is prioritised within the network. Also species text is incomplete and inaccurate, and no mention is made of biological recording. On that, IF engaging our knowledgeable recording community to record LNRS indicator / longlist species - and convincing them their input will be used in assessing the strategy's effectiveness - is considered important, there are notable opportunities to encourage volunteering.
- Allowing community engagement with each council authority to offer their voluntary vision, strategy and delivery program. Zero cost to councils, empowerment of local residents and businesses.
- We are keen to continue working with partners to deliver nature recovery in line with all the priorities and actions. Our organisation's emerging strategic planning and structure around LNRS geography informs our capacity to support LNRS delivery, especially around those LNRS priorities we are most able to address now and over time. Where the RA have asked for prioritisation of the most urgent priority for each habitat, we would suggest that prioritisation should reflect deliverability as evidenced from the consultation, alongside a range of benefits to ensure realistic delivery of the LNRS.
- Most of our work involves development in urban areas, often containing woodland, grasslands, and watercourses. We can ensure proposals include these priority habitats and consider connectivity with the same habitats in the wider area within the design.

- The Canal & River Trust have further comments in relation to the document with relevance to our waterways, which have been added to the following sections of the questionnaire. We hope these are clear. It will be important that our name is spelt correctly in the document. This should be Canal & River Trust (with an ampersand not 'and' no 's' on Canal or River).
- I can and have appealed against building on land that is rich in nature which would benefit from further protection and enhancement.
- Using Tick boxes in the questionnaire to obtain public agreement to your measurements of success is unacceptable. The ten-year period for measuring progress is too long. Key Performance Indicators should be used, reviewed bi-annually, and made publicly available. REDACTED has spent decades observing and documenting wildlife in REDACTED. REDACTED records and contributions would add depth, facts, and real-world insights to the strategy. They are in the Salford City Council records. He should be included in the process.
- Stop the destruction of trees shrubs and hedge grow happening on Ryebank fields in Chorlton by not allowing the fields to be built on. Chorlton is already short of open green spaces and there is plenty of brownfield land which should be used for new development.
- I think Ryebank Fields in Chorlton should stay as a natural space rather than be developed for housing. I live REDACTED and this is the nearest such space to me, where nature has largely been left to itself over many years and a very diverse natural environment has re-established itself. It seems to me Ryebank Fields is already fulfilling many of the requirements of a local nature recovery strategy and it should be protected. I am very keen to help preserve this valuable green space.
- Please confront the rapid growth of invasive species like Japanese Knotweed and Himalayan Balsam. They're particularly bad around Bolton. Work in partnership with communities and provide financial and educational support for people to get involved.
- As an avid lover of nature, I see too many developers coming in and destroying our woodland. I understand the need for housing, but the smaller areas where developers put just a few houses are being ruined unnecessarily. One of the areas I most enjoy is the land at the back of Falinge Fold, Rochdale. A stunning area of natural beauty that provides a home for wildlife and a peaceful area to enjoy where the air is fresh, please

don't allow housing monstrosities to destroy these animals home and an area that brings so much joy to so many local residents, and the wider community.

- Electricity North West, as Distribution Network Operator for the north west, has clear goals to increase biodiversity across its corporate estate and network as part of its 2023-28 Environmental Action Plan. As part of this plan, we are uplifting the biodiversity of 100 of our network sites through species rich grassland restoration, over 40 of which are within the GM area. We are also planting 50000 trees over the same time period, many of which will also be planted on our estate within the GM area.
- National Trails UK has a Nature Recovery Programme that can support the Pennine Way and Pennine Bridleway National Trails in supporting people's connection with nature and connecting habitats along these linear corridors. The National Trail and Public Rights of Way verges can be managed similarly to road or cycleway verges in some areas.
- We have an area behind REDACTED which has never been built on it was a meadow when I was a child. We allowed it to return to nature and it had very mature oak and ash trees, a badger set, hedgehogs and a foxes. The land owner then decided to apply for planning this has been going on since I was 20. As the area links to REDACTED it is a green corridor. I would like to see the land set out side as a green space and it be developed into a meadow with native species. I would help with the work on this and get the hedgehogs back and increase planting to attract pollinators.
- Planting more, working as a community to increase biodiversity within urban spaces such as by increasing numbers of plant species within courtyards. Planting urban gardens and allowing roadside verges to develop. Buying local produce within urban environments where possible such as supporting local markets
- I will happily do any tasks that need doing to restore, protect and enhance local natural environments and species. I would hope that this work could be underpinned with an apprenticeship scheme (PAID) to train people of all ages for a new career in habitat protection and restoration. There has been so much talk of green new deal and green apprenticeships but it has not materialised and I would love to retrain myself but cannot afford to do a course (at age 41)!
- I can replace trees and shrubs in my garden to enhance their suitability for wildlife and plant hedges for the same reason.

- Within Rochdale, areas that are mapped as needing protection and offer opportunities for enhancement are currently under threat from development. Are planning offices engaging in this nature recovery strategy process??. As residents we have to fight very hard to get the issues outlined really clearly in this plan to be taken seriously. PLEASE educate planning offices (and officers) and councillors around the brilliant habitat descriptions. They just don't get it!!! They are making uninformed decisions on a day-to-day basis and existing habitats are at real risk.
- I'm a REDACTED so I help people built a meaningful connection with the rest of the natural world. I'd also happily volunteer to do tree planting, moss planting etc.
- Being part of the community looking after Ryebank Fields in Chorlton. It needs saving from being built. This rewilded land offers so much.
- I worked with REDACTED and am aware that there is a longer list of threatened species in GM which has not been mentioned in this and other documents published by the local authority. It is vital that this long list be included in the strategy. It must be made clear that all the species included on the long list will be assessed in reviewing the strategy in the future. Other than that, this was a fantastic piece of work and I am proud that I was able to assist the team at REDACTED
- Keep existing green areas which have become areas of diversity, instead of planting news trees and labeling as biodiverse. If an areas has become an noticeable green area and provide biodiversity it should be maintained. A clear examples of this is Ryebank Fields in M21.
- Encourage swift bricks.
- work on species, I am a very active bat worker with key roles locally, regionally and nationally so I already do a huge amount of bat conservation, and a key driver of the work of the local bat conservation group
- Bat Conservation across the whole of GM, we already do it and can influence and lead others in this area.
- Survey of invertebrates and plants on grasslands, farmlands and lowland heath, which are some of the most diminished and degraded (and potentially invertebrate rich / diverse) habitats regionally and nationally - leading on to considered and scientifically sound objectives for conservation management (habitat creation, restoration and improved management).
- With these if I know how I can help

- I live near REDACTED & I could help by publicising available information. I am too old to be particularly active but I do believe that with clean canals & rivers comes better wildlife habitat.
- Not sure as limited dexterity for practical work but live in urban environment and happy to be involved in consultations etc
- Rivers, canals and waterbodies and urban green spaces and buildings - in everyday life (e.g. litter picking, greening my balcony, and through work (working with young people to do projects in and near their schools/youth groups and to connect them with nature and inspire them to continue to protect and restore these habitats into the future). Others - through volunteering for local environmental organisations e.g. REDACTED, and through work supporting young people to volunteer too
- Community group associated with REDACTED and REDACTED, habitats including wetland, mossland, grassland, woodland within an urban context. Regularly achieving funding for habitat and access improvement, local engagement, and undertaking onsite work alongside LWT.
- If there were local community volunteer days I would attend
- Champion the value of our existing environment and highlight any improvements in it to increase the number of people who value the work of those protecting and especially improving the environment. GM is a wonderful place to live and working together we can make it better!
- Living in an urban area this is where I could make an impact. I can make my garden more wildlife friendly, especially for invertebrates. If we can reverse the apparent crash in the number of invertebrates then we'll also be helping wildlife further up the food chain. I'm also involved in REDACTED and can help this priority urban species by lobbying developers and local authorities to take action that will help turn around the rapid decline in numbers of these birds. I can help with both these aims as a committee member of my local park friends group.
- I have been involved in protecting REDACTED and also have created and helped maintain 3 wildlife gardens, one for a community organisation in REDACTED and at my own home. I can think of so many people who love nature but who would not be able to take part in this consultation because they are carers and have limited time. This is a tragedy for nature and for public health

- I love Ryebank Fields with its biodiversity, natural habitat. It is nature at its best. Adorned with insects, birds, scrub, trees & grassland. It clears the air pollution & is a sanctuary, a true nature reserve in an area very badly built up. It's status is worthy of protection & promotion as a special interest nature reserve.
- Preservation of local greenfield site, which has been marked for destruction by developers in order to build housing.
- RSPB's existing management at Dove Stone is restoring peatlands, increasing woodland and tree cover and enhancing grassland habitats.
- I'm active in South Manchester urban communities advocating for climate and nature recovery, both in writing contributing to consultations, both area and species groups like REDACTED, neighbourhood facebook groups, and in practical actions like river clean ups, wildlife monitoring, fighting to save green spaces, and encouraging more people to experience and value nature and nature connection. Encouraging and empowering people to stand up for Nature is a special interest of mine.
- Friends of REDACTED, restore biodiversity to former recreation ground, create and care for a pond
- We have tried to create a diverse woodland habitat and encourage native species. We have seen, in ten years, an increase in diversity of bird species including some less common, like tree sparrow.
- As a member of REDACTED we are working to raise awareness of building dependent species including Swifts and House Martins and the text relating to these species is very welcomed. We are encouraging local authorities and builders to make provision for these species by mandating integrated bird boxes in all new builds and recording locations of existing colonies which need protecting. Wording in the LNRS to give protection to existing nesting sites is needed.
- I am a member of REDACTED volunteer group, based in Stockport. We want to work with the local authority, Councillors and community to particularly help maintain/safeguard our trees. We also want to increase our tree network. We want to change policy in regard to safeguarding trees i.e. being strong about defending claims, redesigning infrastructure to incorporate trees, ensure trees (particularly in green corridors/groups) are safeguarded, be involved in trialling new products that help trees in urban environments, provide work days to help with maintenance.

- One crucial priority is the protection and long-term preservation of Ryebank Fields. I support efforts to save this valuable natural space from development and ensure its future as a thriving habitat for wildlife and a green space for the community. Protecting Ryebank Fields aligns with broader environmental goals, including increasing biodiversity, supporting nature recovery, and enhancing climate resilience. I can help by advocating for its formal recognition within conservation strategies, raising awareness of its ecological importance, and supporting initiatives that ensure its protection.
- Contractors are ignorant in most cases about biodiversity and need to be trained and educated. We need a conference where we are listened to and not just talked at! VOLUNTEERS do things by hand to take care to do the least damage. This is work that contractors could not do. Pay Expenses their expenses, and respecting their volume of input, and their unique insights. The mowing regimes are critical, change their regime and their kit. our work, which is frugal and good value! Bus us to volunteer on the whole project. Include our Urban efforts on your plan!
- I have an allotment in Trafford and am involved in volunteering days on site. I'm also involved in a local community group who are working towards greening our area of REDACTED. I support the REDACTED. I would take part in other volunteer days.
- We can help to take action by promoting the sustainability of these areas and do what we can from them being built upon to stop the areas from being ruined.
- I am very passionate and committed to nature recovery. I already volunteer with REDACTED. I have taken part in tree planting with my local REDACTED and I am also heavily involved with the rehabilitation and care of bats. Through all of these roles I am definitely helping with those priorities that I have ticked but I see a bigger goal of trying to work with, and educate individuals and communities in how they can help take action and responsibility towards their own spaces.
- By supporting and proposing alternative plans for housing developments which do not result in the decimation of the very ecologically important areas this strategy is looking to support
- I live close to the upland moors and would be happy to volunteer locally. Although I have some disabilities, with support, I could take part in wildlife surveys or light maintenance projects.
- I have volunteered for REDACTED carrying out on-the-ground work. I have also carried out community engagement and led volunteer groups in park and waterway cleanups. I

would be willing to contribute in this way to the protection and rewilding of Ryebank Fields. There's nothing like it in terms of naturalness and species diversity within the area. It and Longford Park constitute a green finger extending up from the Mersey into the city centre. It has massive amenity value too, being already heavily (and respectfully) used by residents.

- Volunteering to improve local green spaces
- As a REDACTED. I give feedback to parks promoting good practice. A key issue parks struggle with is maintaining meadow grasslands, the grass cutting regime can't cope with it, i.e. no budget for collecting grass, mowers can't cope with longer grass. I am campaigning for protecting our peatlands by banning windfarms on protected peat: there are enough areas suitable for windfarms not on protected peat for our renewable energy demands.
- As a community group covering a suburban village district, and part of a network of similar local groups in our borough we can work with each other and the public on sharing information, delivering workshops, and delivering projects. We can apply for funding to help pay for projects and provide volunteer hours. We already have 2 wildlife friendly edible garden projects, and 1 meadow project ongoing, and have more projects planned including water management.
- GMBRG promotes the importance of recording amongst GM's birdwatchers. There appears to be no reference in the draft strategy to the importance of monitoring species abundance and distribution, which are key to identifying whether the habitat and bespoke species interventions have been successful or not. There needs to be funding to recruit new recorders, develop their ID skills and train them in survey techniques. Nationally and locally, voluntary recorders collect most of the bird data used to monitor population trends, so their key role should be built into the GM LNRS nature recovery plan.
- I am researching woodland creation and protection in Greater Manchester as part of my research. As part of this, I have been researching people's connections with REDACTED. I'd like to encourage the inclusion of REDACTED in the Nature Recovery Network to encourage the protection of this beloved green space.
- I volunteer with REDACTED, restoring the moor. I manage my personal garden for nature, with a wildflower 'lawn', permeable drives, water butts, trees, etc. I manage our local churchyard at REDACTED for nature. We have 1500sq metres of unconsecrated

ground beside our churchyard that is a wooded area with scrub and bramble. It has a badger sett and is frequented by red fox, roe deer and many other species. We plan and intend to make this into a small community nature reserve with a pond and wheelchair friendly path in due course.

- Hedgerows through hedge planting, hedge-laying and maintenance. Urban green spaces by helping enhance and maintain green corridors, and try to defend them from the ravages of builders.
- This is an excellent set of aims but there is some obvious omissions of areas. Ryebank Fields in Chorlton by Longford Park should be included in the document as a protected site in the nature recovery network. It is a rewilded naturally biodiverse area that is vital to wildlife and this informal natural space should be protected and included.
- Worsley civic trust has a long history of working with Salford Rangers to improve our local natural environment and oppose the building on green sites.
- We have, last year, installed over 100 swift boxes, mainly in Didsbury but some in Northenden and Sale. We have a large project on in Chorlton at present, providing more boxes for this year's returning swifts. We attend events with our display, write in support of campaigns for swift conservation both locally and nationally and are also planning to campaign for insect friendly gardens this summer. REDACTED– South Manchester Swifts <https://southmanchesterswifts.co.uk/>
- Lowland wetland and mosslands...I visit and record wildlife out on REDACTED on a Daily basis Volunteering for numerous organisations over the years...led groups out onto the Mosslands...have submitted decades of records to such as the REDACTED ....etc I hope to continue doing the same...
- Friends of Longford Park have consistently opposed the idea of housing being built on the adjacent Ryebank Fields, ever since 2017. Trafford Council's Activity Plan of 2023 in support of their successful Lottery bid identified the Park as a Biodiversity Improvement Area, and talked of improving biodiversity in the Park and of its connections to wider green spaces, including (to the south towards the River Mersey), Stretford and Urmston Meadows and Sale Water Park, not to mention Chorlton Meadows and Water Park. The Park lacks much biodiversity but the richest area of all is the boundary with Ryebank Fields – and the current proposals threatens this, with a series of paths to be cut through. If the proposals go ahead, not only will there be a huge loss of biodiversity in Ryebank Fields and in the Park boundary area (with the close presence of housing,

roads, streetlights impacting on the ability of Park wildlife to survive) but the availability of a ‘green’ lung from the Mersey meadows extending right into the built-up area of Chorlton would be lost. The Fields offer an unusually nature-rich habitat in a very urban area (with more than 20,000 people living within a 15 minute walk).

## Nature Network

### 23. Do you support the use of the Lawton principles to identify Opportunity Areas for nature recovery?

There were 301 responses to this part of the question.

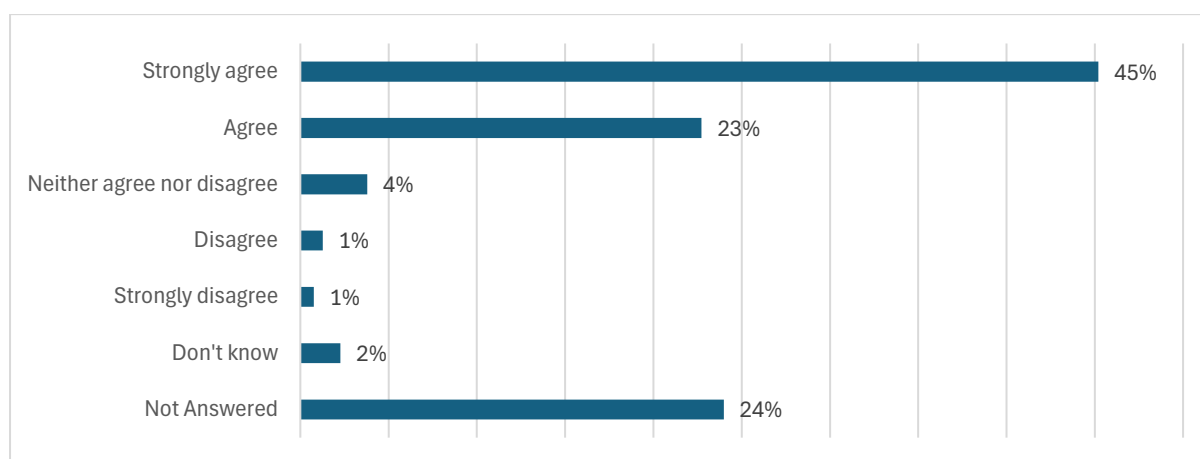


Figure 2221 - Percentage of respondents that agreed or disagreed with the use of the Lawton principles.

Option	Total	Percentage
Strongly agree	179	45.2%
Agree	90	22.7%
Neither agree nor disagree	15	3.8%
Disagree	5	1.3%
Strongly disagree	3	0.8%
Don't know	9	2.3%
Not Answered	95	24.0%

Table 22 - Number and percentage of respondents that agreed or disagreed with the use of the Lawton principles.

If you disagree or strongly disagree, please tell us what you think is missing from the Lawton principles.

There were 26 responses to this part of the question.

- Bigger. Better and more joined is a utopian view, which arguably you can agree with. but these spaces need more proper management to maintain them. It is all good creating these spaces but they need proper management and maintainable to keep them in optimum condition. I see too many areas supposedly wild flower meadows, but this has just been an excuse to not cut grass areas and make savings for a local authority. These areas are then taken over by the invasive species because they are not properly managed
- Because areas around Cheadle/Adswold and Edgeley and other areas are not highlighted for work.
- I would like more green spaces in the city centres
- Stopping use of pesticides, stopping their sale in GM. Improving allotments, more growing and good space for people and insects.
- more jobs needed to teach young people.
- I agree with the points above but would add that additionally more designated sites need to be created. The most important sites for nature need safeguarding against development. The paragraphs highlight the point that they are opportunity areas but there is no protection against development.
- Prevention of encroachment onto, and damage to woodland, trees, scrub and hedgerows, which is encouraged, wittingly or unwittingly, by the current Greater Manchester planning system.
- Lots of greenbelt land in Leigh South omitted from the nature network - and hence, the omitted sites look like a map of potential sites for houses. Wigan Council have confessed to promoting the building of houses on greenbelt (even next to any "Nature Network") - so for Wigan - it is an ACTUAL map of where new houses will be built. Or rather - where there is no Nature Network designated and the land is only greenbelt - then start mixing the concrete!
- Three missed areas: For some reason there is no connection from Harwood Hough Fold Way up to The Quarry at Brook Fold Road and over to the area adjoining Affetside, which is well used corridor and the quarry has a green remediation project in

hand soon. Secondly the area from Bradshaw Brow and Bolton arboretum to Hall'i'th'wood is not well documented and another important green corridor. Lastly the privately owned green belt which is ex golf course and adjacent to Longsight park but marked as Longsight Park on the map should all be down for restoration, some is Bolton owned and leased out and separates and provides recreation for Brightmet, Tonge, Firwood, Bradshaw and Harwood so very important area with badger, Roe deer, bats etc.

- Agree with all but would include reduction in pollution and the use of pesticides and herbicides in greenspace and the highway network which sheds to water ways
- It is essential that the Greater Manchester Local Nature Recovery Strategy reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Paras 96, 98, 103, 104 and 200. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. It has not been possible for me to identify every playing field within the Greater Manchester Local Nature Recovery Strategy area. Any proposal involving playing field land should be discussed with Sport England.
- Ignores restoring nature where most needed, at the centre, at the confluence of Manchester's rivers & canals.
- Ryebank Fields is next to Longford Park and by including both this would support habitat management by providing a wildlife 'refuge' from the more managed parkland, and would increase the size and resilience of the network, as Ryebank Fields has a greater Nature value.
- Protecting green urban sites like Ryebank fields.
- A key driver of the Lawton principles is to improve access to nature in Urban Areas - Ryebank Fields is just such an important wild spaces for local people to access - in one of the most densely parts of Manchester and where the levels of air pollution at one of the highest in the city. We MUST save Ryebank Fields !
- The Lawton Principles make no mention of excluding sites from the Nature Recovery Network because of a desire to build housing on them. The habitat-mapping process generally feels well done given the data available. To allow councils to intervene and reject sites from the LNRS purely because they've identified them for potential development undermines the whole process. I could perhaps understand excluding some sites already given Planning permission, but even that feels underhand. Yes

Planning departments are under intense pressure to deliver housing of course, but that shouldn't give them licence to amend this view on what is best for nature. There also appears to be no mention in this strategy on how it will provide any protection for existing core sites, or important opportunity sites, within the Network. The small LNRS multiplier uplift which applies to BNG calculations is totally insufficient on its own, when developers are not only able to offset this in different locations - they don't even have to do so within Greater Manchester. A commitment from GMCA to require any proposed development within the LNRS network to \*achieve BNG onsite only\* would ensure such development could only enhance the network, would protect quality core sites, and avoid 'robbing Peter to pay Paul' within the Network. A reasonable clarifying policy, this would also grab headlines and set a great precedent for Nature Recovery across the country.

- Ryebank Fields is an area next to Longford Park which should be protected
- Recognise that rewinded spaces , areas to be included & protected. Ryebank Fields I'm South Manchester
- We support the application of the Lawton principles and we would like to see the important concept of buffer zones around a core site protecting it made clearer in the text on p. 26 rather than the phrase improving the wider environment. The Lawton principles should be summarised as “bigger, better, more and more joined up”. Appendix 2c refers to the agreed approach being to only exclude areas from the ecological network if construction or land use change was identified as already underway which we can understand as there needs to be a reasonable chance of delivery of measures within the foreseeable future. However, we question why there are apparent gaps in the coherent ecological network which appear to coincide with proposed or possible developments that are not yet at either of these stages. Some of these omitted areas appear to be sites identified within strategies such as Strategic Housing Land Availability Assessment (SHLAA). SHLAA is an assessment of land availability that identifies potential future supply of land for housing. However, the assessment does not in itself determine whether a site should be or will be allocated for development. The nature recovery network opportunity mapping intends to be evidence led and strategic and should adhere as far as possible to agreed approaches to mapping. Section 89 of the LNRS statutory guidance emphasises that requested removal of mapped measures needs to be considered to ensure this does not weaken

the coherence and ambition of the strategy, particularly where this might impact the potential to join up areas of habitat to form a wider network. The LNRS clearly states it does not preclude development and so mapping land within the Nature Recovery Network does not exclude that land from development. However, the presence of land within the mapped Nature Recovery Network does indicate the ecological and/or ecological value of the land within the network and helps to identify the opportunity to deliver required ecological mitigation/compensation in a way that contributes to the NRN or at least prevents damage or disconnection. The presence of a site within the mapped Nature Recovery Network will support potential developers in the design of the development masterplan as it will identify important biodiversity assets and features for which the site is most important and aid the planning of BNG delivery. It is the intent of BNG that development is used as a mechanism to drive nature's recovery through appropriate and lasting habitat provision, and the LNRS and its mapped Nature Recovery Network are vital tools to align delivery in the best places. The LNRS needs to be allocated the same priority and status as other GM strategic plans such as Places for Everyone in order to achieve its aim to "deliver a resilient network for nature across the city-region, connecting and enhancing wild spaces so that people and nature can thrive". We endorse the paragraph on pressures on nature (page 34) which outlines that if development 'activities are not carefully planned and designed with nature at their heart; they will act to further restrict space for nature. Without careful planning and decision making our remaining natural spaces will progressively become smaller and more isolated, preventing nature from adapting to changes in our climate. Making space for nature alongside other uses of our land is critical to reducing the pressure on wildlife.' and as Wildlife Trusts we support the principles and aims of the nature recovery network to be adhered to consistently by all users. Continuing the theme of application of the Lawton Principles, we are unsure why, in the mapping, expansion zones (buffers?) have not been applied consistently around all core sites or why there isn't softening of edges to create more corridors. Nor are we clear if measures were mapped on buffer zones. Looking at the mapping overall, it is clear some APIBs remain isolated. Our experience of using Linkage Mapper is that the process should have included identification of pinch points in the network which would need particular attention. This mapping does not seem to have done this. We would expect sites such as Hope Carr Nature Reserve to be flagged as pinch points if this had been done. On a more general point about measures mapping, our understanding is that measures

should only be mapped on APIBs of statutory designation/declaration if they go above and beyond the criteria/management plan of that designation/declaration. We query if this has been applied e.g. at Astley Moss SSSI. An assessment needs to be made as to which measures relating to ecosystem services are mappable. Any which are deemed mappable need to be mapped in an evidence-led approach. Nature-first evidence (i.e. Linkage Mapper outputs) should come first before then using information on ecosystem services to identify priority areas (i.e. where needs are greatest). This would then result in a measure being mapped in an area that would first benefit wildlife but also provide wider benefits. Examples of measures which could be mappable using both linkage mapper and ecosystem service data: Target urban tree and woodland planting where it will increase connectivity, climate adaptation and accessibility; Create more native hedgerows, particularly where they act as corridors between existing trees and woodlands, or where they could intercept diffuse pollution or reduce soil erosion; Encourage the planting of trees, woodland and scrub where they will play a role in natural flood management, control of pollution or reduce soil erosion; Install more sustainable drainage schemes, natural flood management schemes and permeable surfaces, in areas that will benefit nature and are most at risk of surface water flooding

- Important to remember that part of the emphasis is connecting communities to nature - it needs to be brought more onto city people's doorsteps, so that they love it and can be motivated to look after it.
- Ryebank Fields contains acres of 'semi-improved' Neutral Grassland - along with woodland, trees, scrub and hedgerow – and could be managed towards the vanishingly rare 'unimproved' grassland habitat. It should be included along with neighbouring Longford Park..
- I think the areas should be more ambitious, there area lot of parks and green spaces within the GM area which could easily be part of the Opportunity areas which are not shown
- Use community groups for more tree planting and creating mini woodlands. Work with schools and colleges – adopt a tree etc.
- See our comments under River, canal and waterbody opportunity areas
- We feel that there are great omissions highlighted below. There needs to be a granular assessment of how the proposals fit with other policies and how important they are seen within the planning framework. If this is a Nature-led strategy, based on nature potential

where development decisions take proper account of harm to nature-rich areas there is need for more local knowledge to be part of the process. Not just each Borough but at ward level. The delivery of this strategy requires massive funding and a real will to put Nature First. It needs to work as a counter balance to the other pressures on the land such as housing and employment needs

- Ryebank Fields is a gem of an urban green space, containing many acres of semi-improved neutral grassland which could be managed towards the ever-rarer unimproved grassland habitat, all complemented by the woodland, trees, hedgerow and scrub (so including two of the GMCA Priority Habitats present). Moreover, Ryebank Fields is a home to priority species, such as hedgehogs and swifts. Given that one of the proposed priorities is to 'protect and enhance existing wildlife rich spaces, it is vital that the site is included in the Network, along with Longford Park.

#### **24. Do you have any feedback or insights regarding the opportunity maps for woodland, trees, scrub and hedgerow habitats?**

There were 156 responses to this part of the question.

- You appear to have made a political decision as to which areas to include. Consequently, central Manchester (which is the most heavily populated area) is a desert in your map. Given the importance you identify of nature being accessible, you have to rectify this problem. There are loads of green spaces in Manchester which are neglected (including public parks) or being concreted over and the first priority should be to halt that now.
- It is so obvious at first glance that old industrial and residential areas of the City of Manchester are lacking in green. This is counter to other major cities in the UK and Europe. Therefore every effort should be made to stop any current green spaces of whatever size or origins should be preserved and enhanced. This must apply to both public and privately owned land and managed by planning refusals for any such land. True brownfield sites offer enough space to accommodate current and future housing demands. As the use of open green space whatever its origins cannot ever be regreened and therefore lost forever and to future generations. There is not enough open green space evident from the map in the center and its residential areas within the City due in the main to its industrial birth. Therefore retain and enhance do not build on in order to satisfy developers and people's wish to live in a particular area. There are enough

current houses and real brownfield to accommodate. Make areas where brownfields are not as popular, popular by investment in quality infrastructure and facilities

- Joining up of areas is a priority.
- Scrub is just an excuse to let an area go wild with no management.
- so it's a bit complex
- IN STOCKPORT THERE ARE A LOT OF OPPORTUNITIES MISSED FOR CONNECTIVITY
- On this map in Atherton, a lot of this land has been earmarked for housing, this land is crucial to sustain bio diversity and needs to be kept as green land
- need to prioritise keeping trees and other vegetation as apart of new builds. In Standish (Wigan) many new esattes have been built with no regard to this, putting pressure omn such as the deet population
- It doesn't feel perhaps like the map is considering large opportunity areas of woodland planting but misses some important considerations: 1) where is there very low tree/ canopy cover. These areas are going to be extremely hot due to urban heating. Moss Side for example has some of the lowest tree cover in Mcr. Perhaps it's worth thinking about where there isn't tree cover as well as where there is tree cover 2) Surely there is the possibility for greater ambition central manchester/ salford. Tram lines, canals routes, existing street trees etc. provide important habitat corridors that could connect up larger areas of woodland. 3) Many areas of the city e.g. nicer parts of South Mcr have a huge amount of trees. Is it possible to increase the size of these and connect with other areas. Wildlife e.g. birds/ bats etc. would hugely benefit from connecting this urban tree cover. The woodland tree maps are perhaps too focused on connecting big projects and sites.
- Westthoughton has a lot of opportunity to improve before being lost to the numerous building projects.
- What is positive/wildlife friendly recreation in an ancient woodland without a dedicated ranger? Where is the connectivity when school grounds and small pockets of green spaces do not show on the map?
- I hope the metro will protect existing green areas and not give in to property developers. As is being suggested at Governemnt level
- Any work to create and develop habitats should also take into account how people can get to, and move through, these green spaces. Otherwise it will conflict with GM's active

travel ambitions, since the walking and cycling routes will be harder to implement once the work on the nature side has already been completed.

- Realistically we need to be removing and replacing roads to allow better connectivity. For example in Hazel Grove the A6 itself is a severe barrier to connecting Torkington park with other green spaces behind the rising sun and across into Norbury
- Encourage people to put in hedges and shrubs in front garden - benefits are huge
- They need to be properly cared for and that means employing professional people full time with proper wages not just a bunch of amateur volunteers.
- Yes none in Adswood/Cheadle and Edgeley
- Yes...it's limited. I REDACTED and have greenbelt fields as designated on the Place for People plan, but only part of these fields are annotated in green? I have an ancient woodland of 163 nature trees that is not annotated, which I could point out to the authors of the Plan if required. The woodland dates back to 1863 and is REDACTED. It's owned by Bolton LA and leads to some suspicion as to why it's not been included? Ideally I would like some feedback?
- could not open it. just goes round and round. no map
- There are many large Mills in and around Greater Manchester these sites are ideal for wildlife development, from bats to owls, grasses and wild flowers, nesting areas for swifts, swallows and house martins, ground nesting birds and insects.
- In Stockport there are opportunity areas missing from the south side of the Mersey and into SK3
- Need to get rid of knotweed there are lots of knotweed sites across GM
- Need to better link up Moston Vale woodlands - huge areas between existing woodlands that could be filled - such as the areas around Central Park and Monsall. Medlock Vale is similar - more trees could be planted in Holt Town, Phillips Park, and further upstream beyond Clayton Vale to create a more continuous woodland along that corridor.
- This should not also introduce movement restrictions of people
- hedgerows should be a priority
- The sale of Gatley Golf Club for development would undermine these efforts significantly.
- My area is just a mass of housing estates and new builds are constant
- Social housing providers and developers must be made to include things like hedgehog friendly fencing, green spaces, connect and protect green spaces around their

developments. Golf courses do not seem to pay much attention to woodland areas, hedgerows, or wild areas on their courses. Near me, they allow Himalayan balsam to run rampant, and do nothing to support, protect or maintain woodland areas, scrub, or hedgerow habitats. Use the VCRSE sector to support schools, developers, council owned land. Planting of fruit trees in communities, encourage community owned buildings to develop nature habitats on green spaces they own or are near their groups.

- Studies have shown how vital hedgerows are as corridors for wildlife. They enable safe movement between areas and different habitats. This allows the search for food and for a mate.
- There should be enhanced protection for Ancient Woodlands and historic landscapes. The Lawton Principles are fine, but public access into Ancient woodland etc is not always to the benefit of the woodland. Where Ancient Woodland abutts new development, a screen of additional planting of woodland edge species of a minimum 30m wide should be introduced (As the Woodland Trust advises) and this should be mandatory. Woodland management needs to be massively improved, entailing the employment of many more people as native tree species are becoming more and more vulnerable to new pathogens. Planting of exotic species is the only answer, but these species cannot perform as native species in achieving natural dominance of one species over another. Woodland management is going to become more and more difficult as time progresses.
- We need to support and develop as much green space as possible. There's a lot of green space in GM.
- Should be more in residential areas. Especially on the free grasslands that are still available.
- I think you need to have a good look at golf courses and how you can influence/engage and enhance them!
- Problems loading the maps. In my opinion stop talking and do it. Also council need to stop using weedkiller and the plants they use should be pollinator friendly. Council building should also have bird boxes installed.
- It is pretty obvious that the area where I live REDACTED, is devoid of 'opportunity, since Bolton Council keeps allowing mass building in the grassland and upper water catchment areas.

- Existing woodland should be increased in density also with native species that allow the regeneration of existing woodland as diseased and non native trees are removed.
- The above connections look good, however it would - where possible - be good to see more connections between isolated and fragmented bits of woodland in the map above, to ensure wildlife corridors are maintained.
- The Map highlights how the development of Carrington Moss will result in disjointed habitats, which is contrary to Lawton Principles. New Carrington should only develop the existing Brownfield land. Carrington Moss is a great opportunity to enhance existing woodland and hedgerow habitats to link up the Mersey Valley with Dunham Massey.
- The map does not show smaller areas of woodland. For example opposite our house there is a small copse of mature beech trees with a few other younger species. This area ( REDACTED) does not show up on the map.
- use incentives and/or covenants on new estates and existing properties to create more wildlife corridors
- A lot of the spaces are currently managed for recreation but could relatively easily and cheaply support improved management for nature. Additionally in and adjacent to existing Local Nature Reserves there needs to be a focus on improving quality. For example the Mersey Valley corridor and the Fallowfield Loop have potential to improve the quality of hedgerows, as where these exist they are generally in poor condition. Himalayan Balsam is also an issue on the edges of woodland and is getting worse each year due to lack of maintenance.
- More opportunity areas should be explored within the city of Manchester itself, as well as in Urmston, toward the northeastern boundary of GM (leading to Meltham) and around the southwest of GM (Altringham), as these are lacking compared to other opportunity areas. Additionally, more opportunities for connectivity should be explored that ideally extend across Altringham, to Cheadle, towards Romiley (especially given the dense opportunity area around Romiley and how much biodiversity in Cheadle and Altringham could benefit from being connected to this more efficiently). Connectivity should also be further explored between Whitworth/Wardle and Littleborough in subsequent aims for Rochdale, Milnrow and Shaw to become better connected to Royton/Chadderton; the large opportunity area East of Near Barrowshaw should have aims to become better connected East, South, and West towards Wall Hill, Lees, and Oldham, respectively. areas should be explored within the city of Manchester itself, as

well as toward the northeastern boundary of GM (leading to Meltham) and around the southwest of GM (Altringham), as these are lacking compared to other opportunity areas. Additionally, more opportunities for connectivity should be explored that ideally extend across Altringham, to Cheadle, towards Romiley (especially given the dense opportunity area around Romiley and how much biodiversity in Cheadle and Altringham could benefit from being connected to this more efficiently). Connectivity should also be further explored between Whitworth/Wardle and Littleborough in subsequent aims for Rochdale, Milnrow and Shaw to become better connected to Royton/Chadderton

- there is good coverage of the SBI Castlecroft and Bradshaw Brook and LNR Bradshaw Brook from Jumbles dam, Harwood, Bolton but there is a need on what is labelled Longsight Park ( it is private green belt mainly) and up Brookfold road where the quarry is, which is remediating soon and over to Affetside as a connection
- Nature corridors look great, could push for more trees in the city centre
- Plans for ury could e a bit more ambitious in terms of woodland expansion (e.g. Holcombe Moor slopes, Whitefield landfill site)
- Some areas highlighted within the Trafford General Hospital boundary are not suitable as they are either likely development sites, or have underground services which cannot be grown over.
- yes who is going to manage these sites?
- Any plans to do anything which will improve the current dire levels of biodiversity would be welcomed. However, all actions must be taken with a long-term strategy in mind, such as the maintainance of hedgerows in a proper, nature friendly fashion.
- Try to link up areas to provide corridors for wildlife
- creating connections is a great idea- we are already working in one corridor
- these are too easily ignored by planning committees of council's desperate to meet government housing targets
- Within my own local authority area (Rochdale), I can immediately see that some opportunity areas are subject to current live planning applications or preapplication discussion regarding PFE allocations, so these may need to be reviewed. I would also consider there to be relatively large swathes of Manchester, Trafford and the west side of Oldham that remain untouched, but more urban parkland could also be supported to be improved and enhanced with the appropriate level of funding and intervention.

- Impacts of adjacent future private/public sector developments should be taken into account including mitigation measures & requirements for contributions to delivery of these nature objectives through the planning process
- The triangular piece of land in Marple bordered by Arkwright Road, Oldknow Road and B6101 and designated a playing field is not used as a playing field and as it is often too wet and could provide an opportunity for a diverse habitat for woodland, scrub hedgerow and other wildlife. .
- The work done has in my view been very comprehensive, thorough and aligns well with the right aims, priorities and targets.
- I have a comment about the legibility of the maps in that there appears to be insufficient differentiation between the shades of grey in the key. This makes the map hard to understand. (This comment applies to all the habitat specific maps.). Also I assume much of the map is data driven? To what extent has the map been groundtruthed and reviewed by stakeholders? And if the latter task has been undertaken, have the maps be amended accordingly? (This comment applies to all the habitat specific maps)
- I would like to know more about how Brabyn's park, Marple will be used. it looks like a lot of the park would be used to expand existing woodland. Rather than expanding woodland out from the existing (less used?) fringes. it looks like areas near the mainly unwooded entrance area are identified for trees.e
- more bio diversity is needed, so many areas of GM are deprived and people do not have access to nature and cleaner air, or noise pollution from the car lobby which forces people not to take up opportunities to actively travel and stay healthy. We are the worst ICB for health outcomes and progressively getting worse.
- The opportunity maps misrepresent the full extent of what should be protected and enhanced. The concept is presented as if this is something that is outside the scope of existing woodland, trees, scrub and hedgerow habitats. It is obvious that the woodland, trees, scrub and hedgerow habitats associated with the formerly proposed route for HS2 are still at risk from those who are determined that there will be a railway line through and beyond the Timperley Wedge. The proposed development of the Timperley Wedge would also damage woodland, trees, scrub and hedgerow habitats, just as it has at Oak Farm, Sunbank Lane, Ringway. There is an in-built inconsistency between planning initiatives proposed to assist Local Nature Recovery in this document and the damage to woodland, trees, scrub and hedgerow habitats that has been inflicted on Greater

Manchester by its planning system over the last 20 years in the name of "growth" (e.g. the unilateral grant of planning permission for a Dakota Hotel, North of Manchester Airport by the Director of Planning, Building Control & Licensing for Manchester City Council, using what have been assumed to be delegated powers, who approved application 140206/FO/2024 on 6 September 2024, without proper consultation with, or reference to, the local community, in the full knowledge that this would have an adverse impact on existing woodland, trees, scrub and hedgerow habitats.

- Yes. The woodland adjacent to the Rochdale canal at Ashfield Valley would benefit from more TLC. Recent storms have felled a number of trees and no one is taking responsibility for clearing the woodland pathway or especially the stream that flows by. I have seen Kingfishers down there I just wish people in the community would care a whole lot more about this green lung and not leave it to the whims of petulant youths.
- The broad analysis is fine but it's clear that there are lots of unidentified opportunities especially with more urban parts of our area
- Are there plans or schemes to encourage residents to plant more trees in their own gardens? I assume that the areas of South Manchester here which look completely devoid of trees are because private gardens have not been included, although some areas like Whalley Range are much greener than suggested by the map. Meanwhile on my street in Sale most of the trees in people's gardens have been removed in the past 5 years (largely for convenience by landlords) and I feel this is a missed opportunity to educate people about the value they bring to our environment. A discounted scheme for targeted residents to buy native species for example.
- It is clear that the city centre is in need of further street trees and green infrastructure to connect the spaces around the periphery
- Yes, land north of Rayner Lane, Ashton Under Lyne, OL7 0FU (W3W ///behave.rapid.dads) is missing from the opportunity areas for woodland and scrub, this is currently designated priority habitat (woodland) and potentially wet woodland, with the potential to also support Priority Species willow tit. Habitats on site include woodland, ponds, grassland, reedbeds and scrub. This site should be incorporated as part of the strategy and protected from any proposal development. It is a high value site, and would make a wonderful Local Wildlife Site.
- Very difficult to see on my laptop. The colours are not sufficiently different to see what is meant.

- The failure to act on damage caused to nature areas by landowners needs to be resolved
- We are working with City of Trees to enhance the tree coverage within our estates. Their principals of 'right tree, right place' and work involved in locations has been very successful and resulted in 76 new trees in the 24/25 FY alone. We would look to expand this programme if appropriate funding were available to do so.
- Many of the areas in Wigan already exist AND one of the nature reserves Wigan council have built a children's play area next to a bird nesting site (on warm days the noise is deafening) + allowed an overspill carpark to be built in the same nature "reserve" (hardly reserved for nature?) for the local sports village - bringing in cars and pollution. This policy is the bottom of the pile and will only deliver in areas unsuitable for housing.
- None in Manchester City Centre -are there not smaller woodlands that could be prioritised?
- The woodland, scrub and hedgerow area directly north west of Falinge Fold is under appeal by land developer who wishes to build 3-storey houses on wildlife land. The insight we've gained is that GM and Rochdale have little concern for actually protecting vital habitats, and are quite willing to allow development-creep whenever a pushy developer gets to know planning office staff.
- There do not seem to be many opportunities
- No consideration of smaller scale opportunities in the city centre where tree planting would help with climate adaptation where it will be felt most acutely in future e.g. surface water flood risk and heatwaves
- There is opportunity on the exgolf course area greenbelt, under private ownership labelled erroneously as Longsight Park. The area of Bradshaw Meadows locals do not want to see heavily wooded, its had trees planted this year but is meadow. Much of the rest is excellent. I am also a private small land owner and we are just planting a small wood on land off REDACTED one of the opportunity areas highlighted
- Stop the building on green belt as a first step! It is ridiculous to developing this strategy whilst destroying local green spaces and greenbelt
- We think that the mapping process for all the various habitats and identification of priority actions for these areas are excellent. In some of the areas it is clear that minor

amendments could be made but we feel these could be discussed with SMBC at the local recovery plan stage.o

- There is existing established woodland at Ryebank Fields between Chorlton & Stretford, that is being threatened to be destroyed for housing
- Kingsway Business Park (and Atom Valley in general) less habitat needed for car parking and grass planting
- I'm generally ambivalent with regards to opportunity mapping as these don't account for human constraints.
- I would like to see more sites identified along the North Cheshire boundary (Wilmslow)
- While the council concentrates on park and scrub land in the main urban areas, there is a growing problem of home owners destroying the green space outside their front door. Ripping out trees, bushes and lawns to make way for car parking and zero maintenance spaces. This needs to be stopped.
- All good
- In some places it's noticeable that the green corridors are interrupted by existing urban areas. Therefore important to encourage greening of urban areas too.
- Don't build houses down Falinge Fold as it butts up to the edge of Healey Dell
- Sport England does not object to the Greater Manchester Local Nature Recovery Strategy encouraging sports clubs to increase biodiversity on their sites, but these are not appropriate areas for the following actions; •creation of wetlands • restoration of peatlands •planting of trees and hedgerows •more sustainable management of existing woodlands and other habitats like grasslands It is these actions that the Government expects LNRS's to cover (See: <https://www.gov.uk/government/publications/local-nature-recovery-strategies/local-nature-recovery-strategies>), so for this reason Sport England would not expect to find playing fields included within the draft Greater Manchester's Local Nature Recovery Strategy. NB: This is unless, in the case of trees and hedgerows these are on the edge of the field and these do not affect the ability of the playing field or sports ground to function. It has not been possible for me to identify every playing field within the Greater Manchester Local Nature Recovery Strategy area. Any proposal involving playing field should be discussed with Sport England.
- Ryebank Fields Chorlton should be included in this Nature Recovery Network. It should be removed from MCC SHLAA.
- Radcliffe, Other Sports Facility is actually called Redbank Field.

- No qualified feedback
- Could there be opportunities for pocket parks or urban woodland in the city centre?
- Ignores restoring nature recovery most needed, at the centre, at the confluence of Manchester's rivers & canals
- Save Ryebank Fields
- Yes. Edgeley Wildlife Reserve (undesignated but recognised by GMEU) is missing from the map, as is the narrow treeline along the south side of the neighbouring Sykes Reservoir. Although other nearby railway embankments are shaded, the railway embankment which links the reservoir via Edgeley Wildlife Reserve to the land south of Adswold Recycling centre is also omitted (as is the land behind Adswold Recycling Centre). Edgeley Wildlife Reserve Group are working toward a designation status for Edgeley Wildlife Reserve. We mentioned this to the GMLNRS stall at Stockport Climate Action Now Conference. It is the largest area of natural green space and reclaimed land in Edgeley ward. It has been enclosed and rewilding for decades. It consists of broadleaf woodland (according to Forestry Commission guidelines on woodland), grassland and scrub. It also has a 'currently' piped spring fed rivulet running through it. It is the perfect site for a designated urban nature reserve in an area deprived of natural green space, it needs protecting, meets all the nine stipulations for designation set by central government, is adjacent to an enclosed reservoir and has red listed species and other listed species among its inhabitants and users/visitors. For more information please visit [www.edgeleywildlifereserve.com](http://www.edgeleywildlifereserve.com) Please contact me for further details.  
[edgeleywildlifereserve@btinternet.com](mailto:edgeleywildlifereserve@btinternet.com)
- Ryebank Fields should be included
- Ryebank Fields contains all three habitats, along with Neutral Grassland, and should be included in the Network along with neighbouring Longford Park.
- There is little green consideration for Chadderton
- Ryebank Fields (next to Longford park) should be included on the map as it contains all 3 habitats along with neutral grassland
- Ryebank Fields contains all three habitats, along with Neutral Grassland, and should be included in the Network along with neighbouring Longford Park.
- I see deer, fox, badger and whole host of birds and other wildlife daily and i am frantic to save this area, as a planning application is currently under review to build 4 luxury homes on this land. If this application was accepted it would simply be a tragedy for the

area. The land is deemed a greenspace corridor and having this destroyed would destroy so much wildlife and nature and a dearly loved local greenspace. I am a REDACTED this area regularly, i live in a community that enjoys the space, the nature the wildlife and all that nature offers here and we are fighting with all our vigour to protect this beautiful space. We hope you can help us protect this beautiful slice of nature and help us recovery it back to what is should be, beautiful, natural woodland.

- I wish to protect the land at fallinge fold which is home to greenery, insects, birds, small animals. This is an important green space for the community.
- I think the golf courses could offer more of this - hedgerow and scrub areas particularly
- Wildlife corridors are key and Ryebank Fields provides a vital wildlife corridor as it borders Longford Park.
- The plan identifies components that provide potential opportunities for nature recovery. Some of those components are very widely drawn covering extensive areas of land on the edge of the existing urban area. It is likely that land on the edge of the urban area will be required for development to meet the future housing requirements and other needs of the growing conurbation. The NROA have no policy status and should not be a barrier to the development that Greater Manchester needs – indeed this is explicitly acknowledged in the draft strategy description of those areas. Rather, the NROA are one of many considerations to be taken into account as development proposals are brought forward. In order to ensure the correct balance between meeting the potentially competing objectives of ensuring that development needs are met in full, while implementing a strategy for nature recovery, it is important that:
  - The extent of the NROA are appropriately defined, with emphasis on enhancing connectivity between with Core Local Nature Sites;
  - The GMNP recognises that development can provide positive benefits in terms of supporting the objectives of the nature recovery strategy; and
  - The NROA do not place an undue constraint on development viability.
- Make links to allow willow tits to move up the Mersey to Fletcher Moss
- The area at Carrington Moss needs to be preserved and given the opportunity to grow and develop rather than the plan to develop the site commercially. The plan to develop the Carrington Relief road is going to increase air pollution and reduce the biodiversity of the area along with reducing the number of wild species of animals and plants.
- Ryebank Fields contains all three habitats, along with Neutral Grassland, and should be included in the Network along with neighbouring Longford Park.

- Interesting as a first draft but this must be an ongoing exercise, developed with local knowledge. With no binding protection these areas are especially vulnerable to development and neglect.
- See Grassland for main comments on Ryebank Fields' omission, but it also offers notable hedgerow/scrub opportunities, already having an officially registered (and species-rich) 'important hedgerow' along its boundary with Longford Park, which will be very negatively impacted should development go ahead.
- Excellent data to show. Allowing the public to know the zones, area of interest to support and develop
- We are keen to see Local Plan site allocations reflected in the LHM to ensure benefit from BNG is maximised through strategic uplift. We can work with the RA and Districts to include appropriate site allocations in LNRS now and in the future. We welcome review of the mapping against ecosystem services opportunities.
- Still some lack of connectivity/opportunity around the city centre but understand this is limited by space and extent of development already present, though may be more brownfield areas with potential.
- Page 55 onwards makes reference to woodland, trees, scrub and hedgerows. Clearly canal corridors provide linear routes for hedgerows etc, we consider that this should be referenced in the table page 57/58. Page 55-P58 need to add reference to 'canal corridors' into the paragraph below opportunities where it states - 'More trees and woodlands along our river valleys 'and canal corridors' are a particularly crucial way we could enhance connectivity for woodland species' which would then cover everything that is related to the priorities in the table. Page 59 onwards relates specifically to rivers, canal and waterbodies and opportunities/priorities. This seems to be quite heavily skewed towards rivers. Clearly the environment of canals and rivers are very different, and a distinction needs to be made within the text and the associated opportunities and priorities. Page 60 – Actions Table. There is little or no reference to hedgerows in this table. Suggest that in the practical actions the document should add 'hedgerows' into each of the following where they relate to waterside habitats (as these are particularly important along canal). Priority 1) Expansion, creation or restoration of a variety of waterside habitats, including woodlands, hedgerows, wetlands and grasslands, where it will better connect up existing habitats along our rivers and canals, supporting species movement. Priority 2) Enhance existing habitats within our waterbodies and adjacent

grassland, hedgerows, wetland and woodland habitats to increase species richness.

Priority 3) Expansion, creation or restoration of a variety of waterside habitats, including woodlands, hedgerows wetlands and meadows, where they will better connect existing habitats Priority 5) Restoration and reconnection of habitats alongside canals, including targeted woodland creation, hedge planting/laying and tree planting.

- I broadly agree with the objectives but have reservations regarding the proposed solution. For instance, if provision of more woodlands means planting intensively planted sapplings within plastic tree tubes, then I very much disagree. Covering the countryside with plastic in this way is a travesty and the close proximity of the trees is unnatural. Dainewell wood in Trafford is now a thriving woodland and was achieved without tree tubes. A local REDACTED has planted acres with new saplings without using a single tree tube. If a commercial grower can do it, why can't "conservationist"?
- I think Ryebank Fields should be included in the nature network along with Longford Park. It is painfully obvious from the Nature Network map how little green space is shown in South Manchester. Ryebank Fields contains trees, scrub and hedgerow habitats already providing a wildlife refuge, and this should be recognised in the Nature Network
- Rye Bank Field!! Stop development and work with the local community and movement fighting for it's protection. It's an ecologically unique green space in the centre of one of the most urbanised areas of the North-West. Do not let the planning authority redevelop the site.
- As an avid lover of nature, I see too many developers coming in and destroying our woodland. I understand the need for housing, but the smaller areas where developers put just a few houses are being ruined unnecessarily. One of the areas I most enjoy is the land at Falinge Fold, Rochdale. A stunning area of natural beauty that provides a home for wildlife and a peaceful area to enjoy where the air is fresh, please don't allow housing monstrosities to destroy these animals home and an area that brings so much joy to so many local residents, and the wider community.
- Ryebank Fields beside Longford Park should be protected as it has woodland scrub and hedgerow habitat
- Not at present
- Focus on the local scrub areas and get them more habitat friendly - don't cram too many houses on as we need green spaces for mental health and wellbeing.

- no, only that please do as much as possible, and then some more! We really need to pull all the stops out and be bold
- Good to see that the edges of woodlands are also included in the maps. These are important aspects of woodland health (not just where the trees officially start!) A challenge that some of those woodlands are privately owned and at risk from development apps (e.g OL12 6LE area). How to manage and protect them??
- enough space needs to be given to hedgerows for them to be able to reach size of a mature hedge (3 metres), especially when next to cycleways, roads and pavements to avoid them being cut. if they are to be a wildlife corridor then we need them to be allowed to flower and set fruit. too often (eg between heywood and pilsworth) they are planted too close to a cycle path, which benefits neither people nor nature.
- Ryebank Fields in Chorlton contains all three habitats, along with Neutral Grassland, and should be included in the Network along with neighbouring Longford Park.
- There is meadow being malingering fold that used to be natural woodland ,that was cut down and destroyed ,that I would love to see restored to its natural habitat .
- Yes, protect the areas that have become biodiverse that have mature and growing woodland, trees, scrub and hedgerow. Like Ryebank Fields which is next to Longford Park and by including both this would support habitat management by providing a wildlife 'refuge' from the more managed parkland, and would increase the size and resilience of the network, as Ryebank Fields has a greater Nature value.
- Rye bank fields should be protected for woodland and grassland
- Tree planting should never be undertaken on habitats that naturally have low woodland cover (species-rich grasslands, heathlands, peat bogs, flushes / fens) and when tree planting is carried out it should only be done where natural regeneration through successional processes is not feasible (with the exception of hedgerows, orchards and urban street planting). Mass afforestation of large parts of the country will not immediately solve carbon issues and that is a disingenuous and scientifically flawed approach. Ultimately, tree planting should be a last resort and strongly considered, given that we have greater tree cover nationally than we have had for many, many centuries. Mass tree planting that is not carefully considered ecologically is basically green washing.
- Designate Rye Bank Fields as scrub habitat - it has not been used as sports facility for decades!

- Gout Valley nature reserve certainly needs a block on any road building or any other disruption
- Map is not clear enough sorry. I think if there were local community days with subsidised trees/hedging or free if on benefits to help people plant in their area
- Ryebank Fields, REDACTED, has lots of trees, scrubland hedgerow and grassland which provide rich habitats for birds and insects
- Include Ryebank Fields as it has all of the above factors
- Ryebank Fields, a greenfield site which directly neighbours Longford Park, Stretford should be added as it is rich in woodland and hedgerow habitats
- We are unsure why Ryebank Fields has been missed off the opportunity mapping. This is an area supporting a mosaic of grassland and scrub habitat important for scrubland birds and as a mosaic of habitats within an urban area. The site lies immediately adjacent to an area identified as priority 2, action 1: to target native woodland and scrub creation where it will connect existing woodlands and scrub. Ryebank Fields is potentially of better habitat quality than that identified immediately adjacent to the site and should be included within the opportunity mapping. A large patch of Tongue Moor Wood appears to have been missed off the opportunity mapping. Scrub woodland along the top of Red Moss SSSI needs to be extended to include scrub areas to the west. Woodland within Mandale Park – Rochdale should also be included. Woodland adjacent to site allocation 8 - Land to the north of Rothwell Crescent should be included – this is a priority habitat. Sewage wood in Wigan, a LRS site, has been excluded. Should be part of network - we have Willow Tit there and it forms part of the stepping stone cluster around Edge Green and Golborne park etc. Wet woodland along the edges of Little Woollen Moss has been included in woodland mapping when it should have been categorised as wetland under the categories of this LNRS. Mapping of precise areas on New Moss Wood is incorrect. Woodland has been mapped in areas of peat restoration. Bull Hill in Bolton appears to have a APIB in the centre – we are unclear why this is and whether this is for veteran trees
- Ryebank Fields contains all four habitats and should be included in the Network along with neighbouring Longford Park.
- Create more opportunities on Mirlees Fields, and along Poise Brook - Bosden Farm
- I think Rollins Wood is already fully planted and is not an opportunity area but a core area.

- Apart from a tiny bit of mapped area on Bracadale Drive in Adswold, Stockport, there are no mapped areas to protect, enhance or create any of the habitats listed south of Stockport Town Centre. There are old trees in Alexandra Park, Edgeley and Woodbank Memorial Park in Offerton. There is a Deciduous Woodland on Moscow Road East that should be mapped. The connectivity will not happen without this very urban area retaining/enhancing provision.
- Yes, and Ryebank Fields should be included alongside Longford Park. Ryebank Fields offers greater ecological value and serves as a wildlife refuge next to the managed parkland. Recognising both together would enhance habitat connectivity, improve resilience, and support biodiversity.
- Ryebank Fields contains all three habitats, along with Neutral Grassland, and should be included in the Network along with neighbouring Longford Park.
- We are actively apposing a planning application that is looking to build upon the Green Corridor behind the houses on Falinge Fold in Rochdale
- We should also encourage citizens to rewild their gardens, ban fake grass and take care of their environments
- Ryebank Fields in Charlton/Stretford should be included in the nature recovery network. It is vital wildlife haven in South Manchester (where there is very little green space on the map) and includes priority habitats of woodland, hedgerows and grass/wildflower meadows. It is a vital habitat for wildlife, including the priority species of hedgehogs, black poplar & swifts. It neighbours the green space of Longford park & connects to Turn Moss and Charlton Ees, helping develop wildlife corridors. However, it is under threat from housing development which would destroy this habitat that could play a vital role in enhancing and expanding the GM nature network.
- not allowing developers to destroy
- Disappointed that the map for Littleborough doesn't include habitat around the Calderbrook area. Using some of the wild space here stretching between Wardle and Summit and the SSSI at Blackstone Edge could create a really good long stretch of wildlife corridor for priority birds, insects and mammals, which could strengthen species by ensuring less likelihood of interbreeding and less destruction through a lack of continual nature corridor.

- Ryebank Fields contains all three habitats. You know it is a semi-natural, self-rewilded site. By your own definition it ought to be designated a Recovery Opportunity Area. That designation would benefit the Fields and the adjacent Longford Park.
- There do not seem to be many opportunities to enhance this habitat within Manchester city centre. Could urban trees be introduced along streets or canals?
- In the area to the east of Hollingworth Lake, a developer has recently put in proposals to put carparking on land identified as core woodland
- The woodland and scrubland along the banks of the Peak Forest Canal between Woodley and Romiley are not marked despite these being established nesting and roosting sites for many bird species and bats. The woodland at Edgeley Wildlife Reserve, Stockport is not marked. The scrubland on the banks of Tin Brook at Hopes Carr, Stockport would be a perfect site for a new nature reserve in the town centre.
- I would recommend including Ryebank Fields in the Nature Recovery Network. It's a wildlife-rich and human-valued green space with priority habitats (woodlands, hedgerow, grassland) and priority species (Hedgehogs, Black Poplar, and Swifts).
- You have not included some churchyards and burial areas as areas that can be managed really successfully for nature. In particular you have not included the churchyard at St Paul's Norden and the attached land I mentioned in the section asking what I can do to help.
- The maps won't open. I'll send a separate email that I hope you can use.
- Ryebank Fields in Chorlton by Longford Park should be included in the document as a protected site in the nature recovery network. It has both woodland trees, scrubs, hedgerow and grassland habitat. It is a rewilded naturally biodiverse area that is vital to wildlife and this informal natural space should be protected and included. It would enable better linkages and wildlife corridors. To include the more managed Longford Park and not Ryebank is an error. The fact there might be a planning application or the site being considered in the SHLAA should not mean it is excluded, Please include and protect.
- I would support extending tree preservation orders to including more trees & a wider variety of trees
- Much more community action on rivers etc. Adopt a river.
- Improve the habitat in the woodland off Cutnook Lane North and South of 12 Yards Road on Chat Moss Map Refs SJ716964, SJ717961, Also preserve/improve the

Treeline that runs alongside Barton Moss Road/Astley Road/12 Yards Road on Chat Moss

- See our comments under River, canal and waterbody opportunity areas
- Astley Rd M44 Twelve Yards Rd M44 Cutnook Lane M44 Barton Moss Rd M30 Are all important areas of Trees and hedgerow habitats They require some management and care to ensure their continued health.

**25. Do you have any feedback or insights regarding the opportunity maps for river, canal and waterbody habitats?**

There were 111 responses to this part of the question.

- Canals in and around Manchester are in a very poor condition with littering and poor accessibility, make landowners such as Peel Holdings who own sections of the canal fund restoration projects on their areas.
- Support the work of the Canal and River Trust with financial support. They need to continue restoring and maintaining Marple area waterways including restoration of riverbank path between Marple Dale and Chadkirk bridge Chad
- Maintain and develop what we have.
- According to the old 19th century floras, there were once many ponds and ditches, in the Chorlton area, with rich floras. Most of these have disappeared but there are scraps and fragments that could be restored or better managed,
- Need to be used as a flood mitigation measure.
- The stream in Carr Wood in Bramhall is currently contaminated by UU discharging sewage into it. This has to stop before water quality and life can improve.
- IN STOCKPORT THERE ARE A LOT OF OPPORTUNITIES MISSED FOR CONNECTIVITY
- Need for more links between water courses and cleaner waterways to encourage such as otters. Need to proecutte farms , builders and industry for breaches in legislation with vigournd
- Need to expose and reclaim the urban "lost rivers" which have often been culverted, and are in poor condition. Opening up the Medlock in Mayfield is a great example.
- The current state of the rivers in Mcr is disgraceful. This needs to be tackled urgently as part of the Nature Recovery Strategy work. In 2022 there were 7,168 sewage spills into

the Croal Irwell catchment area, according to Environment Agency data analysed by the Guardian. In 2023 the amount of spills had risen to 11,974. This is the highest rate of sewage spills in all English rivers when accounting for length, at 95 spills per mile.

- Smaller streams are missing. Westhoughton has some smaller areas that could be improved.
- Local ponds do not show on the map
- I presume some measures to protect woodland streams, that feed into rivers, will be protected
- re instate old waterways canals and rivers as well as helping the environment they help with peoples mental needs.
- Torkington Park again used to have a small lake within the park which was filled in many years ago but would make a great site to expand waterways in the areas with the stream running through the park. The land in question is already very waterlogged and not as much use for other things
- The rivers need to be uncovered. If businesses on the river bank need refurbished they should have to rewild the river banks
- Prioritise the management of Himalayan balsam, Japanese Knotweed, and similar invasives that degrade these habitats
- More support for the canal and rivers trust, support provided by United Utilities ideally
- could not open it. just goes round and round. no map
- Pollution, pressure needs to be put on water companies to clean up our water ways. Councils need to provide more litter bins and keep areas clean, rubbish kills wildlife and pollutes waterways. Farms also pollutes so the councils need to check that there is no drain off from factory farms. Councils need to manage the surrounding areas so that wildlife is not impacted by humans
- More areas need to be allowed to flood, to reduce need for building higher flood barriers - a lot of grassland and woodland areas alongside rivers can serve as detention basins protecting places downstream
- This should not also introduce movement restrictions of people
- just go for clean ups, interesting maps
- Re-connect the canal link between the Ashton Canal and Debdale Lake, Gorton.
- My area is just a mass of housing estates and new builds are constant. Can't protect nature unless you stop building so many houses.

- It would be great to see the canal and river Douglas restored to how it should be, with Himalayan Balsam removed and appropriate plants added instead. It is perfect to encourage water voles, and other species to come back to the area. The lack of upkeep of these areas means it can be difficult for nature to move between sites and spread.
- The recreation of natural flood meadows would considerably assist in flood prevention. However, if the flood waters contain sewage and other contaminants, this will permanently damage the flood meadows as grazing land, for which it was traditionally used
- Flood defenses are critical moving forward as more precipitation is likely as climate change evolves.
- Cannot load map
- Once again, water bodies and upland water courses REDACTED; Westhoughton, are either filled in or built round. Thanks to lack of control by Bolton Council.
- Rivers and canals should be restored and managed in a natural way by removing concrete structures and landscaping along the sides of rivers and canals with trees, hedgerows and verges that will assist wildlife.
- Carrington Moss is crisscrossed with ditches and brooks. It provides natural flood plains but also links up habitats with the River Mersey, Sinderland Brook and the River Bollin
- Lower Gower Hey Brook in Hyde is surrounded by defunct rubbish strewn allotments and could be improved as a small nature reserve next to and leading into the Haughton Dale Nature Reserve.
- Key to this is minimising pollution from anthropogenic sources, especially waste water and agriculture.
- I think the potential is quite distinct between canals and rivers. I don't think the river corridors are in particularly good health even in less urban areas and green belt. In the Mersey Valley Himalayan Balsam is taking over the banks year by year. Enhancing rivers is a high priority. This needs to be tied in with thinking about flood management. With the canals it is more about active management for nature where the canal width permits and doing more with the banks. In nature reserves in the Mersey Valley, lack of maintenance is causing ponds to become choked by reeds.
- the opportunity map for Bradshaw brook needs increasing to remove the barriers to wild brown trout as there are 4 weirs between Jumbles dam and Firwood fold, running

through Longsight Park. as the Kingfisher trail. Eaglet brook access paths for people are poor too, Both Bradshaw, Bolton areas

- Canal towpaths should be Public Rights of Way throughout, as should river banks IN URBAN AREAS. Elsewhere, the priority for river banks must be preservation.
- Rivers and waterways are key corridors for wildlife. Restoring and improving them is also a key opportunity for flood management, looking to nature based solutions. They are often located within a convenient distance of residential areas, offering access to green / blue space. Planting trees along them helps with tree cover targets and flood management. Rivers and waterways have often been overlooked opportunities, but they offer multiple potential benefits and opportunities.
- the rivers and canals need constant monitoring for wildlife. But no one is doing this.
- We must be careful over allowing too much access in areas where wildlife is expected to recover/continue to flourish. People allowing their dogs to use water bodies as play areas must be addressed.
- I'd like to see angling as a priority
- yes - too long and detailed to go into here
- we think the idea of adding rocks to weirs to allow fish to travel upstream is excellent
- Again, could be ignored by councils who have an undersupply of housing.
- As for woodland habitats
- The triangular piece of land in Marple bordered by Arkwright Road, Oldknow Road and B6101 and designated a playing field is not used as a playing field and as it is often too wet and could provide an opportunity for a diverse habitat for aquatic and other wildlife.
- It's important to work with stakeholders upstream to make sure that the water entering the borough is in good condition, and that it leaves the borough in a better condition where possible.
- Again, very comprehensive, thorough and aligns well with the right aims, priorities and targets.
- In the Marple, Stockport area, The Memorial park and Arkwright road recreation area are both identified as River, Canal and Waterbody opportunity areas. this does not seem appropriate for either area. Arkwright Road currently has a large extent of grassland which is just mown once a year and will hopefully increase grassland species over time and support more insects including butterflies. The memorial park is a mixture of grassy areas, play areas. an area of accessible woodland is also being planned for currently.

- Improve the Rochdale Canal Basin to improve the water quality, attract nature and make it an area accessible for people to enjoy the area and appreciate nature
- Although intuitively sensible, naturalising water channel experiments have not always been all that successful over recent years. Just because "nature" might have a "particular" way doesn't always make it the "right solution". Clearly, most river, canal and waterbody habitats need to be improved., i.e. returned to their original (or better) condition, but not at the risk of creating new unanticipated problems such as unmanageable marsh, flooding. or both.
- Yes. The area on Durham Street in Rochdale that used to be an extension of the canal to Rochdale Docks is ripe for development for both nature and the people who utilise the waterway. The basin in Todmorden should be compared to the opportunities this filled in section of canal could become. It would improve tourism, the local community and its businesses would all benefit greatly
- There are further opportunities along the network of streams that feed the main river systems within our area
- Very difficult to see on my laptop. The colours are not sufficiently different to see what is meant except for the softening of manmade banks.
- Rubbish (ie Plastic and paper) covers the edges of our rivers after heavy rain/storms. The source of the same (eg old tips/ illegal tipping ) needs to be found and action taken.
- The woodlands (Wigan) are around areas of water (can't build houses on water). However, the "proposed woodland" are already being touted for house building as they are close to "nice" views etc so higher house prices drawing higher tax rates = more income.
- Difficult to use the key - blue colours are too similar to identify which areas are opportunities.
- It is vital that waterbody and river habitats -- just like trees -- are not seen as amenities for human enjoyment, but instead are recognised as vital for human, wildlife and flora survival.
- Please do not allow development on floodplains
- Looks great

- Yes, we are upset that Bradshaw Brook does not have weir removal or modification opportunities. We have 4 weirs, two large and two small which require modification. There is also opportunity to unculvert some stretches of Bradshaw brook
- Improve waterbody habitats so that the sides are not canalised and there is vegetation to improve it for otters
- See answer to Q33.
- Other reservoirs in Rochdale (Greenbooth, Ashworth Moor etc) should be included
- Manchester shipcanal already has a lot of varied species of birds, but the boundary and hedgerows are not looked after, the canal has a lot of litter and the pathways by the canal are littered with wood chips from construction panels that have been spray painted. There needs to be an assesment of the area as there are many birds there we should encourage to stay, not wait until they leave. I think all construction companies must take more responsibility when working by waterways. Boards along the ship canal down to salford quays have been there for well over 5 years, they are warped and unsafe for people and animals. More must be done to keep up this well used path including litter and dog fouling bins as many people kick dog poo into the canal it's disgusting. This could be used for so so much more.
- I don't think these maps are particularly useful as they mostly just show where features exist.
- I would like to see more sites identified along the North Cheshire boundary (Wilmslow) for better connection with GM.
- Ditches around farmland which were traditionally used for water run off need to be dredged and properly maintained by the landowner. Remove restrictions on watercourse maintainence originally introduced by EU directive.
- Hard to follow and therefore comment
- Good to see that an effort will be made to encourage natural flows and thereby reduce flood risk as well as promote more biodiversity
- Any enhancements should not be to the detriment of existing sporting provision at any identified site. It has not been possible for me to identify every playing field within the Greater Manchester Local Nature Recovery Strategy area, any such impacts should be discussed with Sport England.
- There are several sections, including those currently designated as SBIs, of the MB&B Canal and neighbouring land that should be improved for habitats, biodiversity and

public access. These include the following: 1. A 700 meter section of canal is being restored at Creams Mill, Little Lever during 2025. This is an opportunity to join two sections of existing SBI aquatic habitat to create one continuous, connected and longer (5 km of water) from Radcliffe to Little Lever. 2. improve the quality of aquatic habitat on the existing SBI site along 1,000 meters of MBB Canal at Agecroft, Salford. 3. extend and restore existing aquatic habitat along a further 1,000 meters of MBB Canal from Agecroft Rd to Clifton Junction by improving the water retention qualities along the bed of the canal. The target would be that this section also achieves SBI status once restoration has been. 4. We understand that United Utilities have plans to improve access to and quality of their SBI land at the Rhodes Farm site, Bury, immediately adjacent to the MB&B Canal. This provides the opportunity to create new aquatic habitats along the dry stretch of canal around the southern perimeter then under the M60 to the canal aqueduct over the River Irwell at Clifton Junction, Salford thereby restoring 2 km of aquatic habitats. 5. In inner-city Salford, phase 4 of the Middlewood development creates opportunities over the next 5 years to improve the quality of, access to and interpretation of the existing 400m section of MBB Canal. Current developments at Upper Wharf Street and Regent trading estate in Salford and future developments along the protected line of the canal provide opportunities to restore aquatic habitats in this inner-city location. These would be situated along the Linear Park outlined in Salford's Local Plan which stretches from Oldfield Rd. to Salford Crescent station. The active travel / towpath alongside would provide good quality public access and useful interpretation of these aquatic habitats. 6. The land immediately adjacent to Lissadel Street in Salford is subject to a development application and could make provision for further blue/green access.

- Pluvial flooding happens in Ryebank Fields Chorlton & any developed surfaces will exacerbate the flooding of homes in Longford Rd & its vicinity
- Look at areas of eutrophication to help identify issues with the water quality.
- No qualified feedbackNo qualified feedback
- Ignores restoring the Manchester, Bolton & Bury Canal, & Manchester & Salford Junction Canal.
- yes this page keeps crashing

- Yes. Edgeley Wildlife Reserve (undesigned) has a 'currently' piped spring fed rivulet running through it. This rivulet joins a culverted 'brook' which is essential to the three reservoirs in Edgeley and is also ultimately connected to the Mersey river system.
- There is little consideration for green in and around central Oldham, South Chadderton Oldham and Westwood Oldham.
- Agree entirely with your strategy.
- Swifts feed above waterbodies to catch insects. The cleaner they are and the more natural plantlife they sustain, the better all round.
- The plans relating to this component of the NROA are difficult to read and it is not clear which designation applies to specific sites – detailed commentary and review is therefore difficult at this stage. The plan identifies components that provide potential opportunities for nature recovery. Some of those components are very widely drawn covering extensive areas of land on the edge of the existing urban area. It is likely that land on the edge of the urban area will be required for development to meet the future housing requirements and other needs of the growing conurbation. The NROA have no policy status and should not be a barrier to the development that Greater Manchester needs – indeed this is explicitly acknowledged in the draft strategy description of those areas. Rather, the NROA are one of many considerations to be taken into account as development proposals are brought forward. In order to ensure the correct balance between meeting the potentially competing objectives of ensuring that development needs are met in full, while implementing a strategy for nature recovery, it is important that:
  - The extent of the NROA are appropriately defined, with emphasis on enhancing connectivity between with Core Local Nature Sites;
  - The GMNP recognises that development can provide positive benefits in terms of supporting the objectives of the nature recovery strategy; and
  - The NROA do not place an undue constraint on development viability.
- There are "pinch points" along the Mersey, eg Palatine Road, where strengthening and expanding green spaces could make more linked habitats
- As above; all desirable aims but this needs more binding protection.
- Unsure how this highlights where to prioritise tackling ongoing water company and other pollution? Seems to be the whole waterway network - prioritisation would help target real action on this.

- Excellent evidence of the whole GM zone to have such network of waterways. An historical effort by the first Industrial revolution. Today, as custodians to preserve, improve and allow the public to share in the voluntary actions to support the Leaders vision
- We are keen to see Local Plan site allocations reflected in the LHM to ensure benefit from BNG is maximised through strategic uplift. We can work with the RA and Districts to include appropriate site allocations in LNRS now and in the future. We welcome review of the mapping against ecosystem services opportunities.
- Page 24 - is a section on Rivers, canal and waterbodies. However, the supporting text seems to mostly relate to rivers. It would be beneficial to include something about canals in this section as they provide an important corridor for nature in their own right. The canals also have an abundance of wildlife and habitat including rare aquatic plants. In the Rochdale restoration section (page 25), there is reference about recreation but not the importance for wildlife. It would be good to include a few words about this, considering the Rochdale is a designated site for a rare aquatic plant – *Luronium natans* (SSSI/SAC designations). In terms of pressure on nature (page 34). Reference needs to be added in relation to Floating Pennywort on the invasive species list here. In terms of this invasive species, it is a huge problem in the Wigan Borough. A collaborative approach to dealing with this highly invasive species is key to the success of ecological enhancements across the wider network. Pressure from adjacent development is an issue, but Biodiversity Net Gain (BNG) can have a part to play in offsetting that impact. We can't see any reference to BNG in the document and consider that references should be added. In terms of climate change, major storms can have a huge impact on our waterway infrastructure. With climate change such storm events are set to become more frequent. Furthermore, in terms of climate change the risk of drought conditions affecting water availability and resource in the reservoirs and canal system (vital for maintaining habitat conditions for key species) should be included. Page 50 relates to urban green spaces and buildings. In terms of the priorities we consider that greater reference could be included in relation to improving/enhancing access to the canal network (reference is made to the Bee Network on page 53). This could be expanded to included reference to 'urban waterways' and the role these play for local communities in providing access to green/blue spaces. It seems like the table on page 53-54 is lacking reference to our canals/reservoirs and the role these can play. Page 68 relates to

species priorities and actions. This include water voles, with specific actions noted on page 70. However, we note that there is no reference to aquatic plants. The canal network supports a number of nationally rare aquatic plants which should be added.

- the river sodden REDACTED has a CSO which overflows too much get UU to get this sorted as part of the improvement to waterways.
- Great maps! How to enable access to waterways cutting through private land??
- several small ponds in Ryebank Fields provide refuge to local wildlife like newts.
- All the mapping and objectives I would strongly agree with and support.
- Love all the water bodies of greater Manchester - they are also an opportunity to created safer corridors for walking and cycling on paths along them
- The river gout is particularly polluted. Every day you can see sewage & factory rubbish in it.
- Many smaller river systems appear to have been completely missed off the mapping e.g. Bradshaw Brook is an important corridor running through Bolton sites such as Seven acres and Thicketford Road. Additionally, Cheeseden Brook and Naden Brook. In Stockport, Adswood Brook is excluded despite this needing flood management and Natural England identifying its potential for nature recovery.
- Poise Brook
- The mapping colours are really hard to see clearly, therefore making it hard to understand which category things fall into. The river Mersey in Stockport Town Centre leading west is very dirty with lots of rubbish. The river Goyt has a lot of Himalayan Balsam along its banks close to the town centre.
- There is so much pollution in the canals, litter, sewage and derelict boats - this needs a major clean up and fines for those fly tipping into our waterways
- give bridgewater canal in private ownership to be part of network
- Knowing our own local area best, would say that providing additional waterbody habitats on the moors surrounding Calderbrook, Littleborough, would help the curlews and other wildlife, as apart from a private pond, there's very little in the way of water for wildlife there, as can be seen on the map. A lot of the waterways/waterbodies are already established, so would be great to create new ones, which would help wildlife thrive, particularly when there's very dry hot Summers.
- There are culverted waterways crossing Ryebank Fields, see here <https://hidden-manchester.org.uk/> for details. These could be exposed and renaturalised.

- Hollingworth Lake is a site of biological importance, there are issues with water draw down often in summer related to its use as a feeder for the Rochdale canal, this has impacts for wildlife including de oxygenation of water jeopardising fish, making bird breeding areas more accessible to the public as the edges become dry and greater likelihood of algal blooms etc when water levels are low.
- The stream running through Tangshutt Fields park in Romiley has not been included on the map, and is an established invertebrate habitat. Padden/ Chadkirk Brook which run on either side of Otterspool Road and connect with the Goyt are not highlighted, yet these are established wet woodland habitat corridors that must be considered as part of an overall habitat in that area. Tin Brook which runs through Hopes Carr valley in Stockport town centre is not even marked on the map, this is a perfect site to create a new wetland/ woodland habitat using filter bed planting to clean the water. Edgeley reservoirs and the adjoining Edgeley Wildlife Reserve which is an established wetland habitat need to be marked on the map and earmarked for protection and expansion.
- It seems odd that small streams such as the Naden are not included as opportunities for improving connectivity
- planting along the banks of the River Mersey in South manchester with plant species that have good root structure to stabilise the banks and stop them eroding in the floods.
- Manchester has some of the most polluted rivers in Europe. This problem needs to be addressed.
- Dear Sirs, I REDACTED Manchester & Stockport Canal Society, a member organisation of the Inland Waterways Association - a National group promoting the restoration and improvement of canals in England, Wales and Scotland, particularly those canals not served by Canal & River Trust. I wish to bring to your attention one glaring shortcoming illustrating the areas for Local Nature Recovery Strategy :- The Green corridor running north from Lower Gorton reservoir to the Ashton Canal between locks 10 & 11 at Claytonbrook Road - locally known as "the Yellow Brick Road". This corridor is inadequately identified as just suitable for "Woodlands, Trees, Scrub and Hedgerow Opportunities". It ignores the corridor's potential for "River, Canal and Waterbody Opportunities" This corridor, some 2.0km long and was originally part of the route of the Stockport Branch Canal - used to carry goods all the way to Lancashire Hill, Stockport until the canal closed. Manchester City Council (MCC) had the foresight to retain the corridor, turning it into a pedestrian way and cycleway. The Stockport end of this canal

has been largely built over. All the bridgeworks and land area associated with this section of canal are intact, indicating the historic intention that the canal could, at some stage in the future re-emerge as a water feature, as did the Ashton Canal in the late 1960s/1970s. The Manchester & Stockport Canal Society (MSCS) was set up precisely to promote such an ambition and has received approval in principle from MCC and United Utilities to pursue the objectives of:-

- re-creating the canal, with associated waterway features along the corridor, with Lower Gorton reservoir at Debdale Park as a destination. This work would compliment the present footpath and cycleway - hosting a marina on Debdale water for visiting boats from the wider canal network and providing a source of income for the future management of this regeneration. The project has the wholehearted support of Mayor of Greater Manchester, Andy Burnham, who, as well as championing the canal's "blue/green" credentials, foresees the re-introduction of the waterway as substantial contributor to the development of sustainable urban drainage (SUDS) in the adjoining area. A video describing this regeneration is available to view on <https://www.youtube.com/watch?v=xhjiYSuqrSw>
- Ten years ago, the Yellow Brick Road was an underused, dark and potentially dangerous route through Gorton and Openshaw. MSCS and Sustrans began litter picking exercises along the canal corridor, slowly raising awareness of the corridor's green credentials - this has led to an increased interest and local care of the corridor, culminating in the improvements to the footpath and cycleway presently underway. The regeneration of the canal, alongside the footpath and cycleway will create the following Nature Recovery benefits:-
- Create a Blue/Green corridor along the route from the Ashton Canal to Lower Gorton reservoir.
- Provide a greater variety of trees and shrubs along the route, diversifying the primarily mono culture vegetation that presently exists.
- Improved Bio Diversity and habitats along the route by the introduction of side ponds and wetlands along the canal side.
- Create opportunities for sustainable urban drainage (SUDS)
- Open up the corridor to more use, continuing to reduce the anti-social aspects of the pathway which existed historically and still persists in places along this nature walk. The re-introduction of the canal and marina has the unique combination of not only improving the Natural Recovery of the corridor, but brings with it an income stream from mooring fees and income generation to the area. This will not only to maintain the waterway but to make a major, if not full contribution to the upkeep of the corridor as a whole. Continued maintenance is a vital element generally lacking from all well meaning proposals. There are no published management plans for future arboricultural management of the present

corridor and the substantial growth of self-seeded trees will continue to take place, reinforcing the monoculture and limiting the biodiversity of this Green vein running through a heavily urban area. Would you please include this project in your Natural Recovery Strategy. Over the years, several reports on the ecological, engineering and commercial viability of this improvement have been commissioned, published and issued to several MCC and GMCA members and staff. If you require sight of these in support of our case, please contact the writer at: REDACTED The Society's main obstacle to realising its objectives is the lack of formal approval from the "powers that be". This absence limits our opportunities to seek the finance necessary to achieve these objectives – all we seek is formal acknowledgement and support for this project. With the support of Manchester City Council, the wider Greater Manchester Combined Authority, and the the Inland Waterways Association supporting our Society, we have the track record to make this happen, The regeneration of the canal and its environs will better serve the locality than simply limiting its green credentials to "Woodlands, Trees, Scrub and Hedgerow Opportunities". Yours sincerely, REDACTED - on behalf of Manchester & Stockport Canal Society.

- It is important that the water within the peat mass of Chat Moss is carefully monitored.
- There are a number of areas where activities are destroying the peat and polluting the mossland water courses
- Woodstock Farm Astley Rd unlicensed processing of waste which is polluting the water courses.
- Destruction of habitats and removal of peat through Turf Production

**26. Do you have any feedback or insights regarding the opportunity maps for upland moorland habitats?**

There were 69 responses to this part of the question.

- As above and rewinding.
- It should be an urgent priority to restore the vegetation on these areas to enable better flood control.
- Enhanced for flood prevention.
- Vital in terms of carbon capture. Need to protect at all costs

- It's crucial to restore the upland peat bogs so that they absorb carbon. I was staggered to hear that many emit green house gases!
  - Brilliant and I look forward to hiking in improved areas with Scouting groups.
  - No, I am not experienced enough in moorland matters
  - sooner the better
  - could not open it. just goes round and round. no map
  - Burning needs to stop, land owners need to be monitored that they are helping not destroying wildlife and land for profit
  - Huge tree planting in these areas could help reduce soil erosion - storing more water, reducing downstream flooding but helping keep the area wet which helps reduce wildfire. I think a ban on disposable BBQs across GMCA would prevent fire damage - years of efforts can be ruined by one fire.
  - This should not also introduce movement restrictions of people
  - Map very difficult to read
  - Environment Bank have 3 habitat banks that are partially covered by this layer.
- Feedback we have had from other Responsible Authorities indicates that the inclusion of the whole site in the map is consistent with the NE LNRS guidance, i.e.: 20.
- Responsible authorities should prepare their strategy so that the statement of biodiversity priorities and local habitat map work closely together. To do this, they should follow this order of steps: 1. Map areas of particular importance for biodiversity. 2. Map areas where nature recovery action has taken place. 4. Agree priorities and identify potential measures for achieving them in the written statement. 5. Map areas that could become of particular importance using the information in step 4
68. Responsible authorities should engage with local partner organisations to find out what environmental projects are already planned or underway to see if the projects could be included as potential measures. This allows the local nature recovery strategies to incorporate existing relevant work and to align with other environmental spatial strategies.' The areas within the map are very similar in character with those excluded and the habitats are contiguous and complimentary. I have sent details of the sites and the habitats proposed to the LNRS team for consideration.
- Use networks of walking/running groups to report problems on upland habitats, undertake nature surveys. Use schools to educate young people about the importance of restoring, creating and maintaining all habitats.

- Restoring heather and bilberry habitats is extremely important for wildlife specific to those areas. Most important is the need to restore cotton grass and sphagnum bog areas. In the last 60 years I have observed a massive reduction of sphagnum moss areas.
- Cannot load map
- I refer the reviewer to my previous answers. West Pennine areas are about the only areas left that could be reinstated.
- Create new woodland and enhance existing ones, and introducing threatened plant species and allow the area to rewild.
- Rewetting is critical for reversing the damage done.
- create many more throughout Greater Manchester, most existing ones are around the edge
- As someone who walks in the Peak District and South Pennines, the poor health of upland moorland in Greater Manchester is very noticeable by contrast (and means recreational walking is less enjoyable quite apart from the biodiversity implications). I would like to see the techniques so successfully adopted by the Moors for the Future programme applied to Greater Manchester upland moorland.
- thisd seems accurate for the Bradshaw NE Bolton area, connecting Bolton and Bury corridorsa
- No. These look fine.
- Restoring upland areas makes vital difference as they are the starting point for a healthy ecosystem in this area, especially for water and flood management.
- yes more wildlife centers and specific walk ways need to be created to protect peat and sphagnum moss
- it is great to see trees and Curlews reappearing on moorland as a result of changes already made
- As above for woodland & water habitats. Plus maximum effort to work with & support upland land owners/users to meet nature objectives
- Same comments as above
- There is no obvious or compelling ecological reason to create transitional habitats to link uplands and lowlands. In fact, this might even be an inappropriate ecological strategy without the application of rigorous in-depth evidence in support of the concept.
- The analysis related to opportunities on the ground seems very accurate here.

- Seems ok for my area.
- Perhaps too much on restoring wet areas and more needed on more native tree planting
- They already exist and it is difficult to build houses there - so targets can be easily met.
- Opportunity should always be about human interference backing off and letting nature get on with its millions of years of expertise. So it's important to absolutely stop encroaching on any and all land that may be eyed up by developers, who should instead only be allowed to rework previously built-on sites which have been abandoned.
- It is very important to strengthen water retention to reduce flooding downstream
- no, this looks right in our area
- Continue to wet the bog and plant sphagnum moss etc
- See answer to Q33.
- They need to be so much more accessible for people to access them for their own mental health and well being. They are generally only available by car.
- Try to expand and connect as much as possible
- Education needed around why upland moorland habitats are vital to the ecosystem we rely on.
- I'm sceptical about the value of all this type of mapping for what are mostly self-defined features, though it's necessary for the project.
- Plant more new forest to create wildlife habitats.
- Hard to follow and therefore comment
- More emphasis should be given to protection of deep peat areas and need to keep peat in the ground - currently under threat from wind farm companies.
- Are there any maps of deep peat which is of higher value and needs protection
- It is essential that the Greater Manchester Local Nature Recovery Strategy reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Paras 96, 98, 103, 104 and 200. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. It has not been possible for me to identify every playing field within the Greater Manchester Local Nature Recovery Strategy area that involve playing field impact should be discussed with Sport England.
- No qualified feedback
- yes this page keeps crashing
- Restore old peat bogs!

- This meadow and the Dell which sits at the back of my home is the reason i purchased my property here in REDACTED. I have no ties to the area but when i viewed the house and its stunning backdrop i knew i had to purchase this house. I have so many videos of wildlife and birds on the land behind REDACTED, the area you have highlighted for recovery. I agree entirely.
- All the above would be excellent for insects and through that, birds and mammals
- All very welcome to save Didsbury from flooding. Beavers and trees for them upstream please!
- Upland flood resilience measures will be increasingly important - habitat protection policy will need to be robust or may lose out.
- Prioritising action where known mountain hare populations hang on should be a notable consideration
- Moorland, to be just that. All connected and only a small part of GM to preserve and nature intended.
- upland moor near Bolton could be a great place for community-led rewilding and nature restoration on a larger scale.
- The areas near Rochdale get the peat protected and develop different habitats to increase biodiversity/
- protection against development please. No windfarms on protected peatland sites. Sphagnum needs low nutrient wet ground to flourish. drainage and hardcore for tracks is bad news for sphagnum and bog creation and disturbance of peat releases carbon
- I would agree with all the mapping and objectives but urge caution re: clough restoration to ensure that this does not compromise habitats of high ecological value.
- Strongly support mapping of these measures on designated sites.
- Golf courses to be more bio diverse
- The opportunities in GM are fantastic for wildlife upland habitat. However, from my experience living in an upland moorland area, I do believe a lot more knowledgeable and active management will be necessary to prevent farmers/landowners burning peat and burying/burning rubbish in some of these areas! Unfortunately the local council rangers are often ignorant of wildlife habitat and conservation and turn a blind eye to it's destruction! More education and oversight?
- Links with the Lancashire and other neighbouring LNRS could be explored to help deliver opportunities for this habitat group.

- Restoration of moorlands beneath existing windfarms north and east of Rochdale should be a priority of the wind farm developers, this is often done poorly or ineffectively. Promises about habitat restoration made by developers at planning stage are forgotten, and local authorities have zero funds to monitor promised restoration. Energy companies are raking in massive profits from wind energy and must be made to fulfill promises they have made to restore and re-wet peatlands.
- Stop or strictly control any grouse/ bird shooting in these areas and allow trees and moss beds to re-establish.
- Please protect all deep peat areas from development (eg windfarms) They are too valuable as carbon sinks to put at risk..
- Try to minimise wild fires in the moorland

**27. Do you have any feedback or insights regarding the opportunity maps for lowland wetland and mossland habitats?**

There were 72 responses to this part of the question.

- As above
- Flood prevention in addition to other measures.
- need to increase for biodiversity
- To the East of Westhoughton is a huge new Ryder Cup Golf housing estate. The best of luck to achieve against the big companies.
- everything needs improving
- Can there be more protection for ground nesting birds from grazing animals
- Protect Irlam and Woollen moss, Peel Holdings need to be signed up to this plan
- could not open it. just goes round and round. no map
- More of these areas need linking to create larger wetland areas - they need to be allowed to flood as this is part of nature
- Reintroduction of species should not also introduce movement restrictions of people
- Encourage private owners of habitat areas to restore, create, and maintain these areas. Golf courses are terrible for this, as are housing developers. Use schools and the VCRSE sector, community alliances, neighbourhood plans, etc, to build in restoration and development of these areas.
- There is a massive opportunity to restore large areas of mossland in Carrington. Unfortunately most of this will be destroyed through development as part of the

approved New Carrington Plan. This will release millions of tons of CO<sub>2</sub> as the mossland dries out. The Inspectors report on P4E requires the developers to keep the lower layers of peat wet while building on top of it. Much of the peat is contaminated, creating a range of problems for developers, considerably less so for restoration. Chat Moss is being very successfully restored despite having similar problems to Carrington Moss and a similar history.

- As per the comments about rivers and canals, more rain can create flooding so wetland areas need to be able to soak up as much excess as possible without draining and developing housing etc.
- Cannot load map
- Built on in the Westhoughton area.
- Creating wetland and restoring peat will capture carbon and mitigate against floods.
- Carrington Moss has deep peat deposits and is a perfect site for peatland restoration. It is an important local habitat and is home to the recovery strategy's priority species such as the willow tit, corn bunting, lapwing and water vole. It also currently acts as a link up core nature habitats at Dunham Massey and the river Mersey valley as per Lawton Principles
- there are more rivers that can be utilised as well as heavy clay areas
- These sites are little understood and often in poor condition. I believe we first need to focus on the health of existing areas rather than adding more. I'm not sure wetland is the most appropriate use of all of the sites, I note for example that those in the Mersey Valley corridor are also opportunity areas for grassland etc and I believe some would be more appropriate for this.
- again the area in NE Bolton labelled Longsight Park but in fact a privately owned greenbelt is missed off but is a well loved area for recreation between 3 communities, Tonge, Harwood and Bradshaw and Beightham and should be added, as should the area by Brookfold road to connect to Bury. All Bradshaw meadows to Jumbles dam should be on
- As above.
- Lowland peat bogs offer a key opportunity as they are not fit to build on easily so you are not losing spaces where homes could be built, but do have potential to be rich in wildlife and accessible for lots of people. Also, they are an unusual and distinctive feature of GM, so we should make the most of them.

- The area identified within the North Manchester General Hospital boundary is subject to large-scale redevelopment plans and may not be available for habitat or restoration and transition habitat.
- no jobs. there need to be careers in this field.
- Links to important areas just outside the GM boundaries are particularly important for this habitat - ie to Holcroft Moss and Risley Moss in Warrington.
- yes - too long and detailed to go into here
- The area around Astley Quarry has been omitted. This should be included in the area for restoring 'mossland' habitat once the extraction licence is completed. Also it seems strange that the training ground at Carrington has been added onto map but surrounding area omitted.
- the more that can be created the better
- Carrington Moss is a 1,000 odd acres of mostly restorable degraded raised peat bog and has been air brushed from your report altogether. Quite incomprehensible. Before considering restoring nature we need to stop destroying nature.
- As above
- Same comments as above
- There is a presumption in this draft document that wetlands and wetter farming (paludiculture) are, in themselves, "good things", possibly because they can, under most circumstances, retain carbon. The situation is much more complicated than has been suggested by the draft document. Whilst there might be some slight benefit to be derived from lowland wetland and mossland habitats, these are not as great as the draft document suggests they might be. Separately, it should be noted that on Page 62 of "A Local Nature Recovery Strategy for Greater Manchester", "Bittern" seems to have been spelt incorrectly.
- Yes. What happened? Kingsway business park in Rochdale ran a coach and horses over and through our local wetland plus the housing estate. That's what your up against trying to preserve wildlife. The stream at Stanneybrook is now bereft of any life whereas just a couple of years ago you could watch the tiddlers in its gentle flow. The developments recently (the bridge) disturbed wildlife to the point where the stream has nothing in it now at all, the herons no longer bother visiting.
- Again there are small scale local opportunities for further gains but the overall analysis is excellent

- The opportunities for the Manchester Mosslands in Salford are very exciting and I'm looking forward to seeing those develop over the coming years. I don't think that many people in GM know about them (I've only recently started to learn and discover them) and it's wonderful to see a whole new type of habitat visitor experience being developed for a very overlooked part of the city.
- Yes, land north of Rayner Lane, Ashton Under Lyne, OL7 0FU (W3W [///behave.rapid.dads](#)) is missing from the opportunity areas for wetland/mossland it is currently designated priority habitat (woodland) and potentially wet woodland, but also contains mosses, ponds, grassland and reedbeds. This site should be incorporated as part of the strategy and protected from any proposal development. It is a high value site, and would make a wonderful Local Wildlife Site.
- Interesting for my area - never thought of it as true wetland.
- These areas already exist in Wigan and have existed for years - would be better if you list the current mossland where building is targeted e.g. next to the A580 (east bound) between Lowton and Leigh - houses and industrial activities will replace mossland habitat - so pardon me if I have significant doubts about this policy.
- The same comments as before.
- Try to do more in the south part of the city of Manchester
- There may be opportunities for wetlands in and around city centre which would benefit biodiversity and people - opportunity to do this seems to be missing from mapping, same for along canals which may also have potential and significant benefits
- yes, REDACTED is an important wetland area with the areas by the REDACTED. We have been planting meadowsweet and red campion and removing INNS from this area last few years
- See answer to Q33.
- All the above
- This map is of more value.
- I don't know if this is possible, but connect the GM's southwest moss corridor to Lindow Moss in Wilmslow.
- Hard to follow and therefore comment
- More opportunities in Spodden Valley than have been allocated
- It is essential that the Greater Manchester Local Nature Recovery Strategy reflects and complies with national planning policy for sport as set out in the NPPF with particular

reference to Paras 96, 98, 103, 104 and 200. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England does not object to the Greater Manchester Local Nature Recovery Strategy encouraging sports clubs to increase biodiversity on their sites, but these are not appropriate areas for the following actions;

- creation of wetlands • restoration of peatlands • planting of trees and hedgerows • more sustainable management of existing woodlands and other habitats like grasslands

It is these actions that the Government expects LNRS's to cover (See:

<https://www.gov.uk/government/publications/local-nature-recovery-strategies/local-nature-recovery-strategies>), so for this reason Sport England would not expect to find

playing fields included within the draft Greater Manchester's Local Nature Recovery Strategy. NB: This is unless, in the case of trees and hedgerows these are on the

edge of the field and these do not affect the ability of the playing field or sports ground to function. It has not been possible for me to identify every playing field within the Greater Manchester Local Nature Recovery Strategy area. Any involving playing field should be discussed with Sport England.

- No qualified feedback
- yes this page keeps crashing
- I agree wholeheartedly with your strategy.
- Sounds brilliant!
- LWT and others are doing amazing work. Strengthen protections and expand.
- As above; flooding mitigation and resilience measures may override habitat protection.
- The omission of considerable parts of the Carrington Moss area, which to my knowledge has no Planning permissions agreed yet and offers notable restoration and biodiversity potential, is presumably politically-motivated again. I'm sure the group focused on that area will have much more insight on that, but it really stands out.
- This is my interest to not only preserve, but to introduce the habitats to restore nature's wildlife nature reserves. To then visit walking
- We are keen to see Local Plan site allocations reflected in the LHM to ensure benefit from BNG is maximised through strategic uplift. We can work with the RA and Districts to include appropriate site allocations in LNRS now and in the future. We welcome review of the mapping against ecosystem services opportunities.

- It is tragic that the Trafford proposals for Carrington Moss fly in the face of the Wildlife Recovery project. The 2 are incompatible and destroy (for me) and credibility of this project. I have the sense that development of the brown filed areas is being ignored in favour of using Green Belt land because this is more lucrative for the developers. You can never really mitigate against the loss of land and its wildlife. Once it has gone, it has gone. Those who say otherwise are deluding themselves or have an ulterior motive.
- Ryebank Fields has areas of wetland which should be a protected habitat
- Not at present
- Develop the land behind Hollingsworth lake to extend the nature reserve.
- I would agree with all the mapping and objectives unequivocally.
- Please save Carrington Moss, recognised as a vital habitat
- Gibbs Farm, grassland to the north and west of Red Moss, needs to be included. Two buffer fields to the south of Astley Moss – should be included. Buffer fields to the east of Astley Moss need to be included. Buffer land to the south west of Little Woolden Moss need to be included. Swinton Park Golf which is not currently in active use and has vegetated areas, tree planting and several ponds of various sizes and forms an important stepping stone in a number of nature corridors. The site has been proposed for housing development (reference CSA-SSA-033 Swinton Park Golf). The site is, however, not required to meet development needs and is afforded protection from development by the SLP:DMP (policy R3) due to its status as recreation land and facilities, Astley East ex-quarry site – the area north of the lake is under restoration for peatland habitats and should be mapped REDACTED would like the site to be included in the mapping process. This can be mapped for wet woodland and peatland areas – it is also one of the Species Survival Fund Wet Willow Wildlife delivery sites. Natural England owned land on Chat Moss should be mapped for the species reintroductions measure. The current paludiculture (Typha) growing site next to Twelve Yards Road SBI on Chat Moss should be included as buffer area. While there is a measure relating to ponds these are excluded from the mapping – understandably due to the DLL approach – but we think somewhere there should be reference to the pond SOAs and how land managers, planners and developers should be taking account of this process. Their entire omission also risks them being over-looked and ignored as part of the NRN. The measures on a number of Wigan Greenheart Landscape Recovery Scheme sites are not mapped entirely correctly.

- Chadkirk
- Important
- peat moss being developed as part of Places for Everyone
- The established wetland at Edgeley Wildlife Reserve is not marked on the map and needs to be protected. There is an opportunity to create a wetland habitat at Tin Brook, Hopes Carr, Stockport.
- The ex Peat Extraction Site off Cutnook Lane Irlam is woefully neglected and could bring 110 Hectares of recoverable Lowland Raised Peat Bog which would then be a Carbon Store and an equivalent success story that the Lancashire Wildlife Trust Little Woollen Moss Nature Reserve it too having been an ex Peat Milling Site with the Peat Milling having stopped at same time as the Cutnook Lane site....yet these two rare habitats could not be in a different state with the Cutnook Site severely neglected...overrun by off road bikers and disturbance such that little wildlife recovery can take place. In my opinion it needs the attention and care of the LWT and it will boost this LNRS massively. Map Reference for REDACTED = SJ712968.....SJ71570...SJ713963...715970
- See our comments under River, canal and waterbody opportunity areas
- The ex-Peat Extraction Site off Cutnook Lane Irlam is woefully neglected and could bring 110 Hectares of recoverable Lowland Raised Peat Bog which would then be a Carbon Store and an equivalent success story that the Lancashire Wildlife Trust Little Woollen Moss Nature Reserve it too having been an ex Peat Milling Site with the Peat Milling having stopped at same time as the Cutnook Lane site....yet these two rare habitats could not be in a different state with the Cutnook Site severely neglected...overrun by off road bikers and disturbance such that little wildlife recovery can take place. In our opinion it needs the attention and care of the LWT and it will boost this LNRS massively. Map Reference for REDACTED = SJ712968.....SJ71570...SJ713963...715970

**28. Do you have any feedback or insights regarding the opportunity maps for grassland, farmland and lowland heath habitats?**

There were 87 responses to this part of the question.

- To often, in the past rough, or even species-rich, grassland has been seen as valueless. This attitude MUST change. In addition there is far too much obsessively mowed amenity grassland in GM.
- Joined up habitats essential.
- need to help farmers become more environmentally aware- perhaps by working with supermarkets to ensure they put this into contracts
- A delicate balance with farmers as there is little money in the industry, so good luck.
- improve but not at the risk of losing agricultural land.
- Need to protect this and encourage more local farming links to local business. We should be encouraging but local with fresh produce where we can.
- Yeah. Can you stop using limestone chippings for paths in areas that are supposed to be acidic.
- could not open it. just goes round and round. no map
- Golf courses should be consulted on how they can help, farms need to be inspected to check run off from hen houses and slurry pits
- We do not need more golf courses, allow areas managed by council such as around houses on estates to grow wildflowers and long grass - they don't need to be continually cut, this "natural" look actually looks nicer than short mono-culture grass. In parks where there aren't sports pitches - allow the same long growth - it creates more space for nature - common in Danish parkland areas, and works really well
- Farm land should be left to the farmers, it already works but some hedgerows could be reintroduced
- My area is just a mass of housing estates and new builds are constant. Can't protect nature unless you stop building so many houses. Map very difficult to read.
- Environment Bank have 3 habitat banks that are partially covered by this layer.  
Feedback we have had from other Responsible Authorities indicates that the inclusion of the whole site in the map is consistent with the NE LNRS guidance, i.e.: 20.  
Responsible authorities should prepare their strategy so that the statement of biodiversity priorities and local habitat map work closely together. To do this, they should follow this order of steps: 1. Map areas of particular importance for biodiversity. 2. Map areas where nature recovery action has taken place. 4. Agree priorities and identify potential measures for achieving them in the written statement. 5. Map areas that could become of particular importance using the information in step 4

68. Responsible authorities should engage with local partner organisations to find out what environmental projects are already planned or underway to see if the projects could be included as potential measures. This allows the local nature recovery strategies to incorporate existing relevant work and to align with other environmental spatial strategies.' The areas within the map are very similar in character with those excluded and the habitats are contiguous and complimentary. I have sent details of the sites and the habitats proposed to the LNRS team for consideration.

- When considering connectivity for walking and cycling, please also consider horse riders. It is virtually impossible to ride off road in the GM area, and it would be nice for the equestrian community to be considered when connecting green spaces. Bringing back traditional meadows or meadow areas will help pollinators and also the deep roots will help with water uptake. Ensuring these areas are not only restored and maintained, but more developed will help migration of wildlife. The lack of attention some areas receive make it impossible for wildlife to move between areas, which is a significant missed opportunity. Encouraging installation of swift blocks in new builds, hedgehog friendly fencing, bee houses, dead hedging, hibernaculums, etc, should be encouraged.
- The areas identified at Hanging Chadder and Tandle Hill have also recently been included as areas required for large numbers of houses and industrial units to built. Is nature now the priority - as it should be. Housing should be built on brownfield sites and not on our green spaces.
- Grassland areas should be created when floodplan meadowlands are re-created.
- Farmers/land owners encouraged to rewild areas and support trees and hedges so wildlife can thrive. Also create wildlife corridors between green spaces..s
- Cannot load map
- Once again, built on. Refer to the Bellway Bowland's Hey, Westhoughton debacle for an example.
- Allow for rewilding of large areas of grasslands.
- Why has the farmland at Carrington Moss been removed from the map?
- Werneth Low Country Park in Hyde, consists of grassland, farmland and low heathland. It would benefit from an expert assessment of how the park should be better managed to improve bio diversity above its already high standard.
- educate people about how they can create these areas instead of their existing lawns and why they are more beneficial

- A lot of this is about farming differently. However for the sites within urban areas, they need active management to improve or reach their potential.
- These are fine, assuming they'd be all going to be included
- There are long-term ambitions and an agreed masterplan (available online) for the redevelopment of Wythenshawe Hospital which could impact the availability of the areas around Floats Road.
- no jobs
- Nearly all of the farmland that I visit regularly is a dead-zone for wildlife. I see this as your greatest challenge, as I think farmers are well and truly stuck in the past, and not easily won over (unless a lot of money is involved). It will be interesting to see how you achieve a reduction in the population of sheep which currently blight our green spaces.
- The southern half of the county looks a patchy. There are important areas of farmland for priority species in Carrington Moss and Chat Moss which have not been included. These are some of the last strongholds for some species e.g. corn bunting.
- If Sandringham Field is allowed to become a flood reservoir and wildflower meadow it will become a community asset
- As for comments on upland objectives
- Same comments
- Yes, there is a suggestion in the draft document that the exploration of paludiculture might be "a good thing". This, apparently recently-invented, term might not be beneficial, especially for grassland, farmland and lowland heath habitats. The crops that might be grown are limited and might do little or nothing to promote nature and lowland heath habitats. Just because paludiculture is a fad doesn't necessarily make it an appropriate long-term activity.
- Yes. Good luck....
- Excellent analysis
- Our own biodiversity improvements are involving Expand previous programme of open space and bio diversity improvements from wildflower meadows, bulb planting and natural Meadows (leaving areas uncut) .
- Area of farmland in Leigh South not a target area for safeguarding (next to the A580) only farmland/greenbelt so ripe for house building. This is not a policy to safeguard farmland.
- No suggestions

- Opportunities away from core nature sites are missing which feels like a lost opportunity to undertake small scale improvements or introduce new areas of grassland within urban setting e.g. on roundabouts, or another example could be within New Circle Square on Oxford Road which has grass but not very biodiverse. Would provide great connectivity for wildlife within urban areas.
- you have missed the grassland of the ex golf course listed erroneously as Lonmgs9ght Park which requires landowner discussion and facilitation as is green belt and well used recreational area in need of nature restoration to support our dwindling mammal population
- Target improving the bio- diversity on our golf courses and in our country parks eg Werneth Low Country Park. Also use the areas that run under pylons to be nature corridors- enhancing low scrubland and hedgerows etc
- See answer to Q33.
- I would say that this map should really show all farmed grassland.
- I would like to see more sites identified along the North Cheshire boundary (Wilmslow)
- Improve plant diversity to enhance insect activity.
- Hard to follow and therefore comment
- Encouraging to see the ambition of expanding semi natural grassland in collaboration with farmers.
- It is essential that the Greater Manchester Local Nature Recovery Strategy reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Paras 96, 98, 103, 104 and 200. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England does not object to the Greater Manchester Local Nature Recovery Strategy encouraging sports clubs to increase biodiversity on their sites, but these are not appropriate areas for the following actions;
  - creation of wetlands • restoration of peatlands • planting of trees and hedgerows • more sustainable management of existing woodlands and other habitats like grasslands
 It is these actions that the Government expects LNRS's to cover (See: <https://www.gov.uk/government/publications/local-nature-recovery-strategies/local-nature-recovery-strategies>), so for this reason Sport England would not expect to find playing fields included within the draft Greater Manchester's Local Nature Recovery Strategy. NB: This is unless, in the case of trees and hedgerows these are on the

edge of the field and these do not affect the ability of the playing field or sports ground to function. It has not been possible for me to identify every playing field within the Greater Manchester Local Nature Recovery Strategy area. Any involving playing field should be discussed with Sport England.

- There is an opportunity in Bolton to restore a small area (approx 300 sq m) of lowland heath (heather) on the edge of Moses Gate Country Park immediately to the south of Hall Lane canal basin, Little Lever. This is on land owned by Bolton Council which is being overtaken by self seeding saplings.
- Ryebank Fields Chorlton has grasslands, scrub, vegetation, hedgerows & trees that should be protected and included into thei Nature Recovery Consultation
- Radcliffe, Other Sports Facility, near Unsworth St and Ainsworth Road is an opportunity for grassland. The condition of the grass on the field is poor in some areas where its been worn down.
- No qualified feedback
- yes this page keeps crashing
- Yes. The land south of Adswood Recycling Centre.
- Ryebank Fields contains acres of 'semi-improved' Neutral Grassland - along with woodland, trees, scrub and hedgerow – and could be managed towards the vanishingly rare 'unimproved' grassland habitat. It should be included along with neighbouring Longford Park..
- Ryebank Fields contains acres of 'semi-improved' Neutral Grassland - along with woodland, trees, scrub and hedgerow. It should be included along with neighbouring Longford Park..
- Ryebank Fields contains acres of 'semi-improved' Neutral Grassland - along with woodland, trees, scrub and hedgerow. It should be included along with neighbouring Longford Park..
- I agree wholeheartedly with your marvellous strategy.
- No pesticides
- Ryebank Fields contains acres of 'semi-improved' Neutral Grassland - along with woodland, trees, scrub and hedgerow – and could be managed towards the vanishingly rare 'unimproved' grassland habitat. It should be included along with neighbouring Longford Park.

- Bizarre omission of Ryebank Fields - as I understand purely on the basis Manchester have decided they want houses built on it. It is already a valued local greenspace, supporting reasonable quality grassland with plenty representative species - diverse birds, bees, butterflies, moths, hoverflies, grasshoppers all recorded recently and historically. It is the jewel in an opportunity to expand the grassland network in collaboration with Trafford's efforts on Longford Park and Turn Moss, and would quickly reach SBI standard. There are few opportunities so obvious for a good-news nature recovery and community engagement story - for GMCA, Manchester and MMU (who would surely fall into line given the right encouragement/support). Feels pretty stubborn to throw all that away for a few quid - and I've not even mentioned its historic lost covenant, or its protected breeding wildlife.
- Farmers are under new financial stress. They know the land and value. Hoping that GMCA are engaging and supporting all GM land owners
- We are keen to see Local Plan site allocations reflected in the LHM to ensure benefit from BNG is maximised through strategic uplift. We can work with the RA and Districts to include appropriate site allocations in LNRS now and in the future. We welcome review of the mapping against ecosystem services opportunities.
- Still seem quite fragmented - are there not more opportunities to enhance existing species-poor grasslands, particularly around city centre, brownfield sites and parks. Crescent meadow in Salford is a great example of a wildflower meadow in an urban space still functioning as a park for the public.
- Ryebank Fields already contains 'semi-improved' neutral grassland and this could be managed towards 'unimproved' grassland habitat. Ryebank Fields should be included in the Nature Network along with Longford Park
- Ryebank Fields has an area of grassland that requires protection
- Lenny barn was given to the children of Rochdale develop different habitats on this get a kitchen garden area available to teach children how to grow their own.
- I'd suggest ecological survey of all potential tree planting sites so that ancient grassland is not planted up by trees.
- Ryebank Fields also supports a growing biodiverse grassland environment. Ryebank Fields contains all three habitats, along with Neutral Grassland, and should be included in the Network along with neighbouring Longford Park.

- The grasslands in the bank fields and Charlton meadows containing orchids should be listed and protected especially the northern marsh orchid colony near the end of hardy lane
- I would agree with all the mapping and objectives but suggest that structure of grasslands and restoration of transitional zones between the mentioned open habitats and scrub / woodland is factored into wherever possible (the loss of these transitional zones is - after the loss of species-rich grassland - one of the greatest losses the UK has had in Biodiversity over the past 100 years).
- Why is Ryebank Fields not included ? It has grassland which has not been disturbed for over 20 years
- Ryebank Fields, currently marked for development is hugely rich in grassland biodiversity and connects to Longford Park, Turn Moss nature corridor.
- Ryebank fields is an area supporting a mosaic and grassland and scrub habitat important for scrubland birds and as a mosaic of habitats within an urban area. The site lies immediately adjacent to an area identified as a priority area for the creation and restoration of species rich grasslands, manage improved and semi-improved grasslands to increase species interest, enhance and manage semi natural grasslands. Ryebank Fields is potentially of better habitat quality than that identified immediately adjacent to the site and should be included within the opportunity mapping. There is an unused golf course along the side of the Middlebrook should be included as it is part of an important corridor and there is potential for grassland creation. The golf clubs at Worsley and Monton also appear to have good potential for linking core sites. All the grasslands within Elton Reservoir area currently identified as priority habitat should be mapped as opportunity area – regardless of development proposals – as this identifies the area as a significantly important grassland landscape where mitigation for development needs to be established at the highest level. Whitehead Hall Meadow has all been mapped for woodland, a large part of the centre of this should be grassland (it has got scrub encroachment). Parts of Seven Acres and Thicketford Road in Bolton currently mapped as woodland is in reality very good quality grassland and should be re-mapped. Similarly – parts of the site off Kilcoby Avenue, Pendlebury are grassland habitats capable of restoration and should be identified as such. We do not know why there is a large gap in the habitat mapping of what looks to be good quality grassland habitat to the west of the Kilcody Avenue site. All of Broadoak South should be included as

grassland opportunity not just the section following the brook. This is identified in the Salford Local Plan as local greenspace designation. The pond should also be included within lowland wetland opportunity area. Between the Moseley Common Places for Everyone Allocation and the current mapped grassland network (adjacent to Cutacre) there is a blank area that should be mapped as part of the grassland network. Wigan Council agree that this may be beneficial. Areas of Bickershaw in the Wigan NNR should be mapped as grassland, south of Diggle. Pennington Ramsdales (Wigan NNR) – most of this should be mapped as grassland Agecroft – we note there are gaps in the grassland network and are not sure if this is due to the methodology which may not hold up on the ground.

- Ryebank Fields contains semi improved Neutral Grassland, with potential to manage it back to unimproved, and should be included in the Network along with neighbouring Longford Park.
- floodplain
- Ryebank Fields contains semi-improved Neutral Grassland, along with woodland, trees, scrub, and hedgerows. It should be recognised as a key site alongside Longford Park to preserve habitat continuity, protect biodiversity, and support nature recovery efforts.
- Ryebank Fields contains acres of ‘semi-improved’ Neutral Grassland - along with woodland, trees, scrub and hedgerow – and could be managed towards the vanishingly rare ‘unimproved’ grassland habitat. It should be included along with neighbouring Longford Park..
- Need more grasslands - can more parks have grasslands within them
- Ryebank Fields in Charlton/Stretford should be included in the nature recovery network. It is vital wildlife haven in South Manchester (where there is very little green space on the map) and includes priority habitats of woodland, hedgerows and grass/wildflower meadows. It is a vital habit for wildlife, including the priority species of hedgehogs, black poplar & swifts. It neighbours the green space of Longford park & connects to Turn Moss and Charlton Ees, helping develop wildlife corridors. However, it is under threat from housing development which would destroy this habitat that could play a vital role in enhancing and expanding the GM nature network.
- Ryebank Fields contains acres of ‘semi-improved’ Neutral Grassland - along with woodland, trees, scrub and hedgerow. Scrubland is undervalued but is species rich and

an important sub-climax habitat. So for another reason, Ryebank Fields should be designated a Nature Recovery Opportunity area.

- Across the region, grasslands particularly ancient grassland are vulnerable and often unprotected. Tree planting is proposed on areas of grassland, and it's vital that adequate surveys are carried out to ensure one habitat is not destroyed in order to create another.
- A whole section of current grassland between Tangshutt Fields Park and Romiley allotments has been omitted from the map. This site is in danger from development which will have a detrimental effect on the surrounding habitats. The designated grassland/ parkland should be expanded onto this area. There is potential for many small sections of grassland within suburban estates that have large 'lawn verges' that could be replanted with native meadow species.
- Ryebank Fields, Chorlton, should be included as an important Grassland site.
- We oppose building on green field sites
- The area to the east of Little Woollen Moss LWT Nature Reserve my REDACTED being SJ688943...if it could be purchased or managed would offer a superb grassland habitat for over the years until recent times when it has been used for Silage Growing used to have breeding Curlew/Lapwing/Redshank/Skylark and IF it could be obtained for nature recovery would add greatly to the LNRS Success.
- Suggestion here from REDACTED and AARD. The area to the west of Little Woollen Moss LWT Nature Reserve my REDACTED being SJ688943...if it could be purchased or managed would offer a superb grassland habitat for over the years until recent times when it has been used for Silage Growing and used to have breeding Curlew/Lapwing/Redshank/Skylark and IF it could be obtained for nature recovery would add greatly to the LNRS success.

**29. We are exploring how we could improve our mapping of actions for urban areas, which of the following areas would you prioritise?**

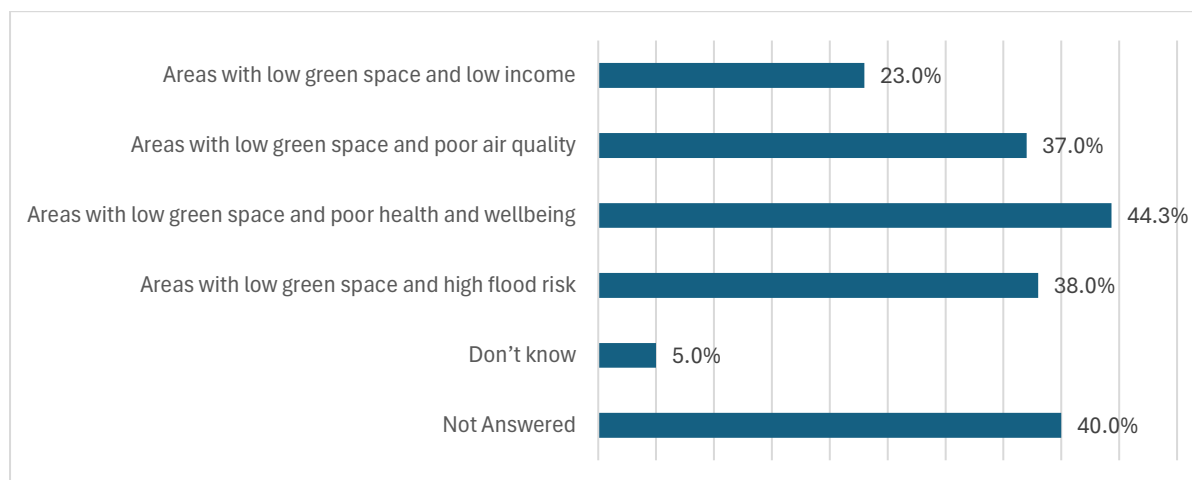


Figure 2223 - Percentage of respondents that would prioritise each improvement for mapping actions for urban areas.

Option	Total	Percentage
Areas with low green space and low income	69	23.0%
Areas with low green space and poor air quality	111	37.0%
Areas with low green space and poor health and wellbeing	133	44.3%
Areas with low green space and high flood risk	114	38.0%
Don't know	15	5.0%
Not Answered	120	40.0%

Table 23 - Number and percentage of respondents that would prioritise each improvement for mapping actions for urban areas.

# Farmers, Landowners and Land Managers

## 30. Do you own, manage or rent land in Greater Manchester?

There were 39 responses to this part of the question.

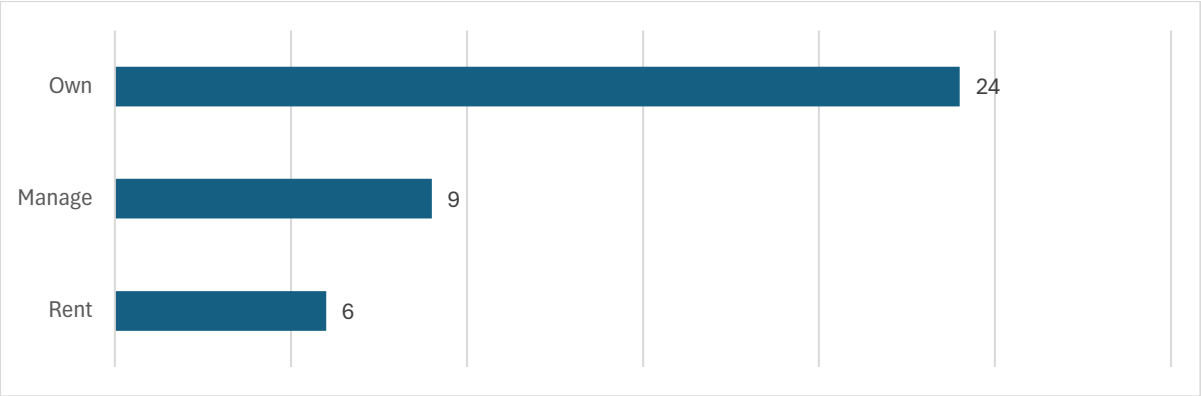


Figure 2234 - Number of respondents that own, manage or rent land.

Option	Total	Percentage
Own	24	6.2%
Manage	9	2.3%
Rent	6	1.5%
Not Answered	351	90.0%

Table 24 - Number and percentage of respondents that own, manage or rent land.

## 31. What do you currently use your land for?

There were 29 responses to this part of the question.

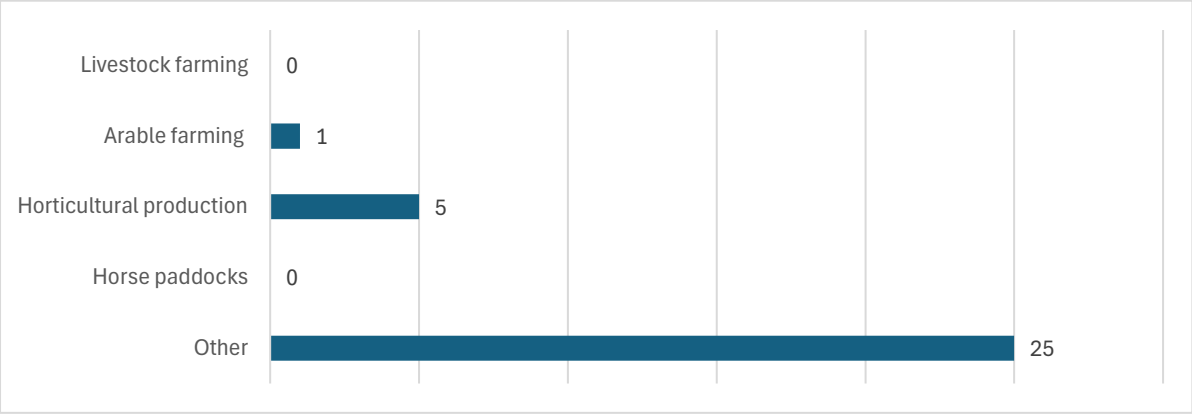


Figure 25 24- Number of respondents that use their land for each of the land uses.

Option	Total	Percentage
Livestock farming	0	0.00%
Arable farming	1	0.3%
Horticultural production	5	1.3%
Horse paddocks	0	0.0%
Other	25	6.4%
Not answered	361	92.1%

Table 25- Number and percentage of respondents that use their land for each of the land uses.

### 32. What sort of land do you have?

There were 27 responses to this part of the question.

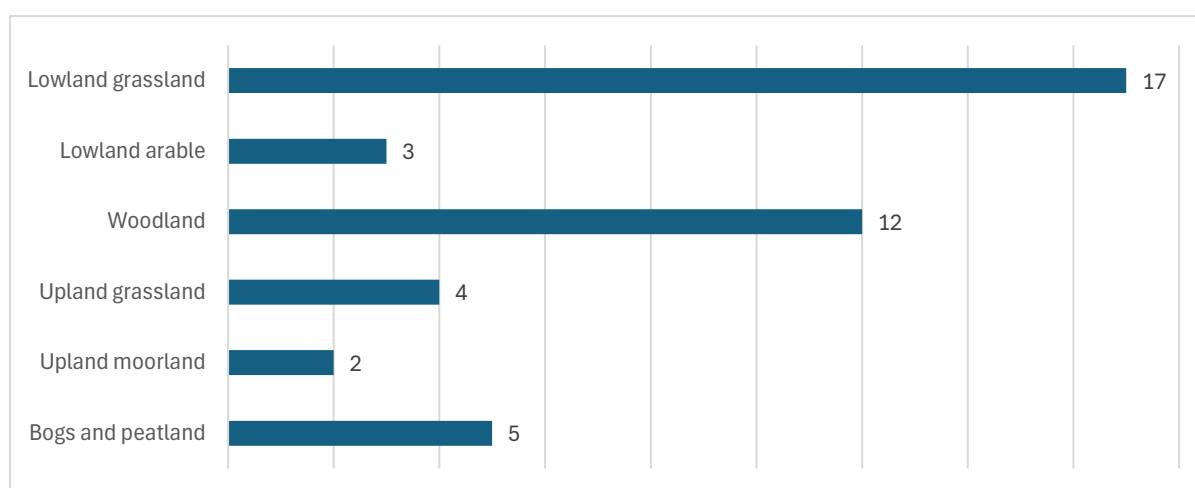


Figure 2625 - Number of respondents with each sort of land.

Option	Total	Percentage
Lowland grassland	17	4.4%
Lowland arable	3	0.8%
Woodland	12	3.1%
Upland grassland	4	1.0%
Upland moorland	2	0.5%
Bogs and peatland	5	1.3%
Not answered	362	93.1%

Table 26- Number and percentage of respondents with each sort of land.

### 33.Are you already involved in an environmental scheme, project or other environmental activities?

There were 38 responses to this part of the question.

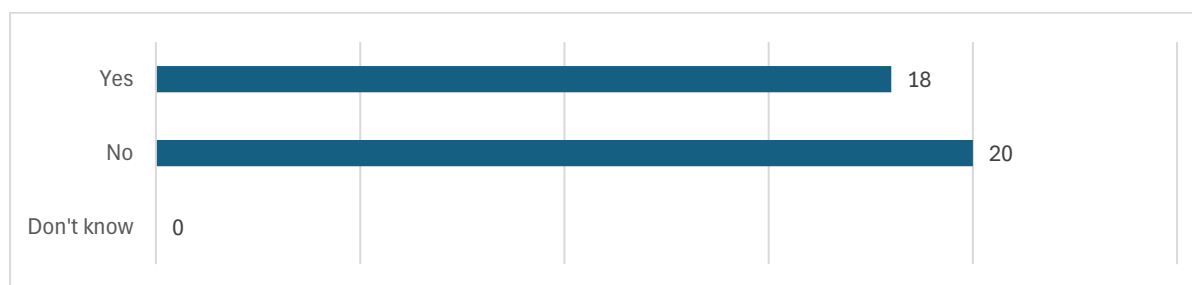


Figure 26 - Number of respondents involved in an environmental scheme, project or other environmental activity.

Option	Total	Percentage
Yes	18	4.6%
No	20	5.1%
Don't know	0	0.0%
Not Answered	352	90.3%

Table 27- Number and percentage of respondents involved in an environmental scheme, project or other environmental activity.

### 34.If you stated yes above, please let us know what environmental scheme, activity or project you are involved in?

There were 20 responses to this part of the question.

- The 3 HB sites are being managed to maximise the biodiversity potential of the land. They are being transformed from largely low value modified grassland environments into biodiverse complex and complimentary habitats designed to provide maximum biodiversity benefits and link to the surrounding habitats of value. We believe that they are also consistent with the criteria provided in the LNRS guidance and should be included in the mapping as opportunity areas.
- The Woodland Trust is responsible for a number of areas of woodland management and woodland creation across Greater Manchester, including our Smithills site in Bolton, which is our largest site in England.

- REDACTED own the land (REDACTED) and have cleared waste and are treating jap knot weed and cut back scrub to be able to pull himalayan balsam and are treating bamboo. We have contacted and met REDACTED about a small woodland over part of the field to corridor connect adjacent woodland and REDACTED. This is in hand
- Bollin to Mersey Nature Recovery Partnership
- yes there needs to be more teaching hubs and for farmers to teach and for ecologists to monitor countryside farm areas
- Oldham Council Environmental Services are responsible for management of a range of green spaces across the borough. Ensuring these are safe and welcoming spaces for all visitors to enjoy, as well as actively managing these spaces to support local wildlife.
- Numerous planting schemes across the country working closely with landowners, business's, charity's and stakeholders
- With City Of Trees Defra grant 14th Feb we are creating a small woodland to connect REDACTED to woodland across REDACTED. We also have ongoing plans to remove HBalsam and have treated Jap knot weed for 3 years. We have planted up a hedgerow which has 2 ancient hawthorn in it by a PROW and will have a perennial wild flower strip and re finding the silted up pond in the next 2 years
- Member of the campaign to Save Ryebank Fields Chorlton that has been deliberately excluded from this Consultation because MMU want to dispose of this greenfield land for development (when Mcr already has excess capacity of brownfield land to meet any national targets.
- Preserving the grass and tree species, through not disturbing! LOL, very cheap
- Climate for Nature - Peat Grant Scheme
- We are actively managing the green spaces within our landholdings for the enhancement of biodiversity and tree planting as part of our regulatory Environmental Action Plan commitments to OFGEM over 2023-28.
- Bird and butterfly census. Hedgehogs den in parks
- Wigan Greenheart Landscape Recovery Scheme
- HLS. Nature for Climate Peatland Grant
- Higher Level Stewardship, Landscape Recovery Scheme, Nature for Climate grant scheme, managing nature reserves on all kinds of habitats etc

- Not as a landowner or manager but as a member of Save Ryebank Fields - we all see ourselves as custodians of the Fields with a reciprocal relationship to them, and care for them as best we can.
- All of our work in managing the land is directed towards increasing biodiversity, providing suitable amenity for locals and the production of useful woodland products and food.
- I have an allotment in an urban area of Trafford. I don't use pesticides and keep areas uncultivated for wildlife on it. I'm planning to repair the pond and create a wildflower area.
- Hedge planting. Wildflower sowing. Orchard planting. And maintenance of those features.

### 35. Which actions would you consider undertaking on your land to help local species?

There were 34 responses to this part of the question.

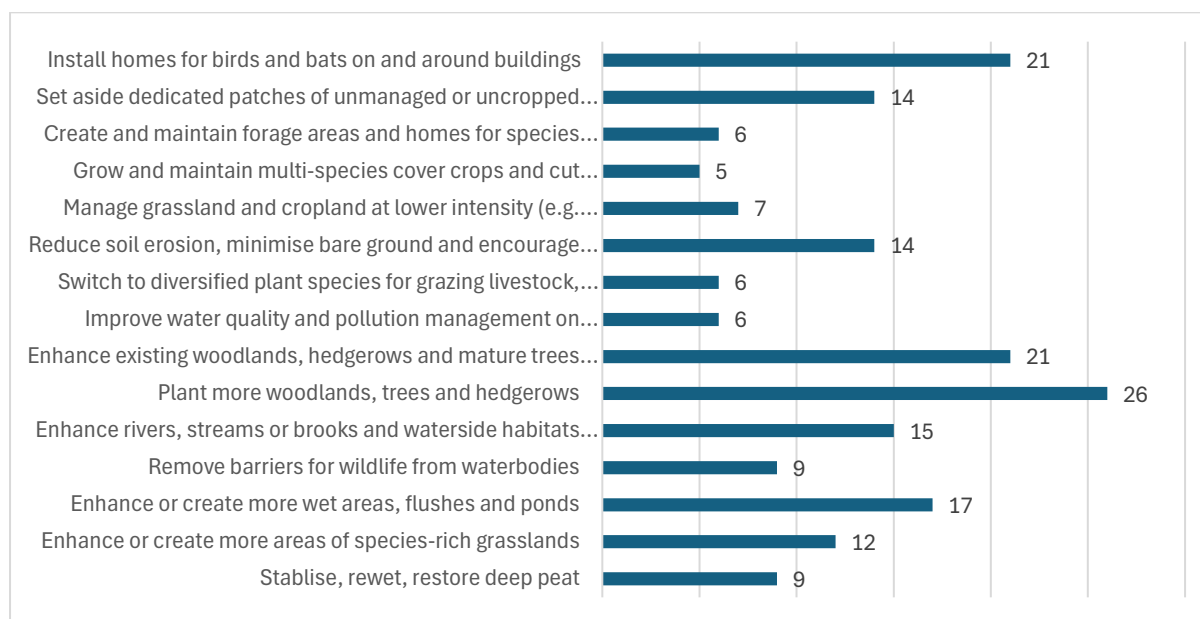


Figure 27- Number of respondents that would consider undertaking each of the actions.

Option	Total	Percentage
Install homes for birds and bats on and around buildings	21	5.4%

<b>Set aside dedicated patches of unmanaged or uncropped areas, along field boundaries, field margins, corners or less productive areas</b>	14	3.6%
<b>Create and maintain forage areas and homes for species on farmland, alongside food production</b>	6	1.5%
<b>Grow and maintain multi-species cover crops and cut later in the year</b>	5	1.3%
<b>Manage grassland and cropland at lower intensity (e.g. lower grazing intensity) and with low inputs</b>	7	1.8%
<b>Reduce soil erosion, minimise bare ground and encourage soil recovery</b>	14	3.6%
<b>Switch to diversified plant species for grazing livestock, establish and maintain herbal lays or species-rich hay meadows</b>	6	1.5%
<b>Improve water quality and pollution management on farmland/yards and control livestock access to waterbodies</b>	6	1.5%
<b>Enhance existing woodlands, hedgerows and mature trees to maximise benefits to biodiversity</b>	21	5.4%
<b>Plant more woodlands, trees and hedgerows</b>	26	6.7%
<b>Enhance rivers, streams or brooks and waterside habitats or banks</b>	15	3.8%
<b>Remove barriers for wildlife from waterbodies</b>	9	2.3%
<b>Enhance or create more wet areas, flushes and ponds</b>	17	4.4%
<b>Enhance or create more areas of species-rich grasslands</b>	12	3.1%
<b>Stablise, rewet, restore deep peat</b>	9	2.3%
<b>Not Answered</b>	356	91.3%

Table 28- Number and percentage of respondents that would consider undertaking each of the actions.

### **36. Are there other activities that are missing from this list that you think could help local species?**

There were responses 18 to this part of the question.

- Management of invasive species. Without this, most of the targets are undermined.
- The Nature Network is also not a barrier to development. Here is the comment developers will utilise in any Planning application or Appeal. I would wish that this Plan has some standing and is not just a tick box exercise that requests our input.
- On our allotment there are many overgrown plots - people on the waiting list visit and decide it is too much to take on. A couple of plots could be converted to a group orchard with wildflowers at floor level - this increases tree canopy, uses abandoned land, is low maintenance and benefits everyone - allotments rarely have trees and land is intensively used. Hazeldene tenants would happily convert some vacant plots to be a group orchard/meadow - if we could have a little support on getting some fruit trees and wildflower seed packs from the council, we can supply the labour and maintenance.
- Reduce livestock numbers to mitigate climate change and river pollution.
- we are already doing this as a friends group too so I am now doing this on privately owned land. financial help would be helpful
- yes no actual jobs are mentioned, who is doing this work? stop putting the ownership on farmers
- Stop the current government from trying to extinguish the heritability of farmland and thereby the interest of potential farmers of the future in helping local nature recovery.
- Homes for hedgehogs and solitary / ground nesting bees.
- I think you should have had this section open to non-farmers/land managers to comment on.
- Enhancing designated greenfield land at Ryebank Fields Chorlton. Awarding this land as Local Green Space. MCC officers have confirmed that this land meets LGS criteria. However, they are unwilling to challenge MMU decision to develop. This land is greenfield. There is excess capacity of brownfield within Manchester & brownfield should always be developed before greenfield.
- All of above. A great list, well done. Talking about a vision is words and of no value. Looking forwards to see reporting achievements please.
- Research and trial paludiculture options for farming on wet soils

- Ensure that brownfield urban sites are properly assessed before development; or particularly targeted for preservation particularly if they have re-wilded over several years and may contain a suite of specialist species. There could be some quick inner-city wins with this approach, and commercial development may not always be beneficial. Consider utilities infrastructure in this too.
- Protected dens for hibernating hedgehogs
- Sustainable woodland management
- MMU and other Higher Education institutions to use Ryebank Fields as a Field Study Centre in rewilding, with projects that would help local species and further increase biodiversity in an urban context
- We have done all of the above since 2015 when we planted 1,500 trees. We think the biodiversity has improved but we would like to do more - create a better pond, encourage more flower species and invertebrates.
- Care and cultivation of allotments should form part of the plan, including the banning of pesticides and weed killers.

### 37. Does the land you own or manage overlap with the Nature Network?

There were 32 responses to this part of the question.

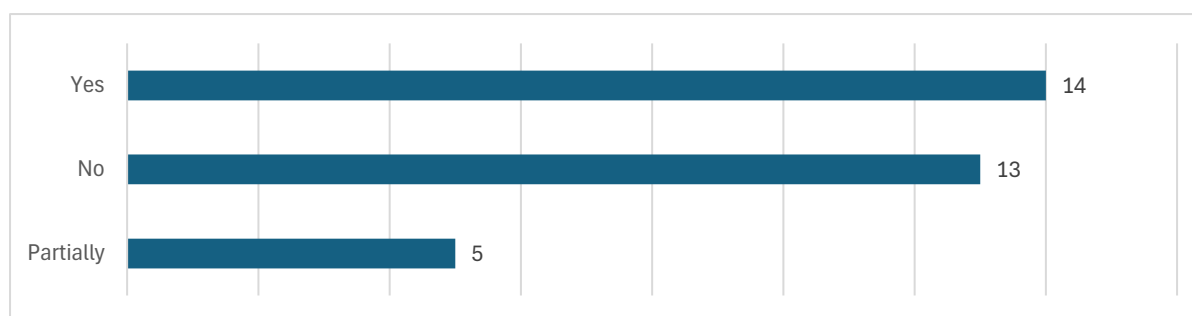


Figure 289 - Number of respondents that own or manage land overlapping with the Nature Network.

Option	Total	Percentage
Yes	14	3.6%
No	13	3.3%
Partially	5	1.3%
Not Answered	358	91.8%

Table 29 - Number and percentage of respondents that own or manage land overlapping with the Nature Network.

**38. What do you think the main barriers are to managing land to deliver nature recovery alongside your current land use?**

There were 24 responses to this part of the question.

- I don't own any land but farmers have a better idea how to manage land than idiotic planners who do not have any experience
- Access to funding. Anti-social behaviour. Funding geared towards new plantings, as opposed to woodland improvement or entering into active management.
- Allotment holders wouldn't want to encourage birds onto their plots - however, pollinating species would be much encouraged hence the need for wildflowers. Birds will come anyway, but having some fruit trees would attract the birds to a plentiful supply of fruit instead of people's crops, and there's be plenty for humans and birds
- The primary purpose of the 3 Habitat Bank sites is to deliver nature recovery.
- we bought it for nature recovery, it will connect into REDACTED SBI in a few years when of standard, we hope
- Future development plans.
- There are no jobs, no money.
- Government policy
- Administration (red tape)
- Local residents (vandalism/theft), current habitat even when in poor condition, current species, mis information on commercial forestry, archaeology or interests, deer populations, grey squirrels, the perception that native trees are better or more important than non native especially in an ever changing climate. perception that broadleaf are better than conifer, cost, going for the cheapest contractor rather than the best, lack of maintenance, lack of education on topics from stakeholders, road network
- Wealth-extracting developers encroaching on adjacent land in efforts to reclassify the land to not be part of nature recovery. Add to this the spreadsheet exercise of calling the act of chopping down a dozen trees but planting two dozen as "biodiversity gain", which is just cynical arithmetic.
- The main barrier is one of income potential. In particular, income from horse-related land use is enormous compared to alternatives.

- The barriers are the developers and planning officers and councillors.vManchester Council should place a Green Space Protection Order on all greenfield land within South Manchester, as there is a paucity of green space within this part of Manchester.
- Fortunately, the land at the back of my premises onto the REDACTED is of no purpose. Other than to keep as wild as possible. First moving to the site in 2010, RBC did block the path many people used as a short cut. Thanks. Now zero cost to maintain.
- Many of our substation sites or network sites in an urban setting, whilst individually species rich, are physically isolated by buildings or urban infrastructure. This reduces their potential for connectivity for less mobile species.
- Private ventures to urbanize areas that should be keep as green spaces. Increasing density of housing in areas which have the same services designed for 30 years ago is not sounds metropolitan management. It created other bottle necks in public services.
- There is a conflict between this plan and the development plans
- Funding and staff resource
- Under-appreciation of the role that nature and natural processes can play in helping us manage land for greater resilience.
- Honest answer - Post-colonial attitudes to land - Money before nature and community
- In our case one barrier is availability of volunteers. We also have a limited budget for more expensive tasks such as pond creation. We have a working Woodland Management Plan. We feel that our land (3 ha) should possibly be classified as a Core Local Nature Site as we have made so much progress with it. This would make it equivalent to REDACTED and REDACTED, both of which are adjacent to our land, so that we form an important corridor linking those larger sites to REDACTED and the REDACTED
- Personal choice of other plotholders, unwilling to give up pesticides and weed killers.
- The fragmentation of green corridors.
- Land previously used in conjunction with adjoining underground reservoir and used for depositing spoil from excavation. Majority of land scrubland and held as an asset for future development. Land to the North East of the public footpath mainly woodland and scrub suitable for improvement. Land to south west of public footpath unsuitable as held as a development asset and should be treated similarly the adjoining disused reservoir. See attached plan.



Comments submitted by email

Each numbered heading below denotes a separately received response via email.

1.

Hi,

I was sent the draft publication to read through and check as I was REDACTED.

There is a lot to praise in the strategy, especially the focus on survey and identification of important sites as there is still so much private land which has not been surveyed by experienced by people, and the focus on the maintenance of existing good habitat as this is invariably in a declining or poor state. There is no point trying to create new habitat if we are not able to keep existing habitat in good condition.

There are just a few points.

In the priority species groups, there is one for grassland fungi. One has the name Oliver Earthtongue, this sounds like a well-loved children's story character. It should be Olive Earthtongue.

In Fungi on page 19, I think it's fair to say that some of our upland sites hold INTERNATIONALLY significant populations. Certainly GM has the best global sites for Jubilee Waxcap, Pink Waxcap and Microglossum rufescens. Jubilee and Pink Waxcaps are rated Vulnerable on the Global IUCN Red List with the population of Jubilee Waxcap on one site in Rochdale being equivalent to the rest of the global population.

In the grassland and farmland section in overview..

"Livestock farming still dominates the northern and eastern edges of Greater Manchester and maintains large areas of more pasture and upland acid grassland." – It seems that "more" is unnecessary here.

In the last paragraph..

Greater uptake of these schemes could help reward farmers for more wildlife-friendly food-production. – I may be wrong but I don't think there should be a hyphen between food and production.

One last thing, this may go against the prevailing thought but the effect for us of climate change is more likely to be overall colder temperatures rather than hotter, there may be

hotter summers but much colder winters. As the Greenland icesheet melts, pushing the North Atlantic Drift southwards, our climate is likely to become more like that of Canada. The climate change section is focused toward rising temperatures

## 2.

Response to general principles:

The Trans Pennine Trail (TPT) National Office and Sustrans are pleased to offer our support for GMCA's Local Nature Recovery Strategy. The ambition to create a more sustainable and biodiverse environment for the region is both commendable and essential.

The TPT National Office and Sustrans stand ready to support this vision in meaningful and impactful ways. As we work to connect people, nature, and communities across Greater Manchester, we recognise that a holistic approach is key to the success of the Local Nature Recovery Strategy.

Our routes can play a crucial role in facilitating wildlife movement, promoting biodiversity, and providing accessible, sustainable spaces for communities to enjoy. Our work aligns closely with the objectives of the Local Nature Recovery Strategy, particularly in enhancing green infrastructure and fostering greater connection between urban areas and natural landscapes.

Both organisations are well-placed to support the creation of walking, cycling, wheeling and horse riding routes that not only enhance connectivity for people but also serve as vital corridors for nature. By integrating green spaces into transport planning, we can create more sustainable, resilient communities that benefit both people and wildlife.

Together, we are committed to helping Greater Manchester become a model of nature recovery—an area where people and nature thrive together, where green spaces are accessible to all, and where biodiversity is protected and enhanced for generations to come.

We look forward to working alongside local partners, stakeholders, and communities to make this vision a reality.

pg15. Green box – pleased to see 'accessible' highlighted. Areas to enjoy nature should all be free of restricted barriers to ensure access for all is provided.

pg. 37 Aims – should also encourage working relationships with other major partners that may be outside of the city region.

Pg 57 – Pg 58 Actions could also include encouraging biodiversity net gain of new developments to go beyond the minimum of 10%.

Pg 78. Developers and Plannings – needs reference to BNG in this section

### **3.**

Greater Manchester Local Nature Recovery Strategy Response from the Woodland Trust

In the priority 'More existing woodlands, hedgerows, trees and scrub are safeguarded, restored and resilient', I think there needs to be a recognition that better woodland management is needed to allow this priority realised. Furthermore, the Woodland Trust would be keen to see a specific practical action set out that includes allowing ancient and veteran trees to age gracefully, including by retaining these trees in place as long as it safe and appropriate, and retaining deadwood in their habitat for as long as is safe and appropriate, recognising deadwood's ecological benefits.

In the priority 'Bigger and better-connected woodlands, trees and scrub, integrated with patchworks of other habitats' and the associated action 'Target native woodland and scrub creation where it will connect existing woodlands and scrub', I would be keen to see a recognition that, where new trees are planted, these are sourced from nurseries that adhere to the UK and Ireland Sourced and Grown Assurance Scheme (UKISG) to uphold biosecurity and protect woods and trees in Greater Manchester from imported pests and diseases.

In the priority 'New urban street trees, urban community orchards and woodlands, improving access to nature and adaptation to climate change', the Woodland Trust would be keen to see an action of 'Utilise existing data and datasets to help identify urban tree and woodland planting where it will be most impactful'. This could include targeting new urban tree-planting in areas where accessibility is poor, but also where there are poor health outcomes or higher levels of poverty and deprivation. The Woodland Trust's Tree Equity Score is one example of a dataset that could be utilised to help support this mapping.

In the woodlands, trees, scrub and hedgerows section, the Woodland Trust would be keen to see some recognition of the need for more trees on new developments, especially as we look to build more homes and infrastructure. As such there should be a priority for 'More existing and new trees on housing developments, either through retaining more existing trees or by planting new ones'. The Woodland Trust recommends a minimum 30% tree canopy cover target for development areas to support nature recovery and increase access to nature, although this can be revised up or down depending on local opportunities and constraints.

The practical actions associated with the priority of 'More varied trees, parkland, scrub and woodland habitats incorporated into our farmlands and more productive woodlands delivering nature recovery' need to be improved. I think we need to specify that we want to engage with landowners, land managers and farmers to advertise wildlife-friendly farm diversification opportunities, and open a regular dialogue with them, and their representative bodies like the NFU, to understand what they need in terms of incentives to consider allocating some of their land for woodland, tree and hedgerow planting.

In the priority 'More space for water and natural flood management in our communities and across catchments', there should be an emphasis on using trees and woodlands to act as natural flood management along river watercourses. This could perhaps be tied into the action on the priority below, which specifies that woodland creation and tree planting should be used to restore and reconnect habitats alongside canals. In the priority 'More community-led creation of new nature-rich green spaces and increased opportunities for local food growing', we would like to an explicit recommendation/action of more funding or support to help enable communities to create and manage nature-rich green spaces. This could come alongside raising awareness of these funding schemes so that more communities know they can take advantage of them.

#### 4.

Hello

I have been looking at the nature strategy, (it's a big read!), and would first like to congratulate all concerned on what promises to be a hugely important development for nature, including the health and wellbeing of us all living in the area.

I note on page 7 there are two areas of nature recovery opportunities outlined. The first is :Core Local Nature Sites are our best remaining areas for nature across the city-region, including all our designated sites and irreplaceable habitats (these form our areas of particular importance of biodiversity).

Well we have such a site at the end of Rye Bank road. The two fields. They are literally that - two fields now rewilded with no intervention from anyone, with many trees and other native plants, and which are home to many birds, bats, insects and other wildlife. They also contain what I have been told is the largest Aspen Grove in Manchester, and a stretch of the Nico Ditch, which is of historic importance.

The fields are on the site of a clay pit, subsequently filled in with all manner of rubbish. They were owned by the Chorlton council and gifted by them to the Manchester Metrapoliton Uniersity as playing fields. The MMU now intend selling them to a developer, who will tear up the two fields and build houses there. This is not only immoral (as it was a gift intended for recreation only), but will have a huge detrimental impact on the wildlife, air quality and people's access to nature.

It will also destroy our Community Garden, which is situated on a patch of land between the end of our cul-de-sac, and the fields. (We still don't know who owns that patch of land by the way).

Us locals are united in our opposition to this, (for all the reasons outlined in your strategy for nature recovery).

I would like to respectfully ask, would it be possible to include the Rye Bank Road Two Fields in your strategy, as a small but well loved and well used existing area of rewilded greenery. We have been fighting this for years, but it seems that a planning application is imminent.

**5.**

Hi

I live in REDACTED the thing most noticeably about Wigan, is the different areas are all merging together, football fields, bowling greens and play fields all built on.

Thousands of houses have been built, special schools for children with disabilities have been torn down and built on, (Mere Oaks), and others, hospitals (Whelley, Billinge) have been built on.

More houses less facilities, the roads are grid locked.

Even Wigan town centre has gone, and flats are being built there.

But other historic parts of Wigan are being left to fall down, no new parks, ponds or natural areas, nature is being pushed further and further away, no fields for owls or kestrels to hunt, parks are used for concerts or night recreation, fireworks etc, light and noise pollution driving nature away.

There does not seem to be any joined up thinking about the consequences of just building homes without any support facilities, doctors, hospitals, leisure facilities, parks and playing fields.

Wigan is now (in my opinion)so over developed that there is a growing number of drug gangs, alcoholism, vandalism and other social problems.

This is brought on by poor planning and development, there is not enough police for the area and they are not able to respond to anti-social behaviour, REDACTED, a gun (may have been fake) held to her head by a young gang of youths! The police were called but the gang had gone by the time they arrived; the gang know nothing will happen.

This is all because of over development without looking at consequences, nature is one thing that is suffering, I am REDACTED yes old and, in my opinion. Wigan has doubled in size in the last 20 years, how can nature survive, I used to see hawks hunting over Standish fields, I haven't seen one in the last 5 years since Pepper Lane and Rectory Lane and surrounding area has been developed, and now the bottom of Rectory Lane is being built on, another large estate.

I think it's too late for Wigan, the damage is done.

Rylands Mill on Walkden avenue would be ideal for bat and wildlife conservation it leads on to Mesnes Park, if you can please, please help to keep it for nature and protect the bats.

**6.**

I hope your consultation is going well. I wanted to register my interest in being kept informed regarding LNRS developments and to request that our habitat banks are included in the mapping as 'potential measures' . The inclusion of the sites in the map is consistent with the NE LNRS guidance, i.e.:

20. Responsible authorities should prepare their strategy so that the statement of biodiversity priorities and local habitat map work closely together. To do this, they should follow this order of steps:

1. Map areas of particular importance for biodiversity.
2. Map areas where nature recovery action has taken place.
4. Agree priorities and identify potential measures for achieving them in the written statement.
5. Map areas that could become of particular importance using the information in step 4.

68. Responsible authorities should engage with local partner organisations to find out what environmental projects are already planned or underway to see if the projects could be included as potential measures. This allows the local nature recovery strategies to incorporate existing relevant work and to align with other environmental spatial strategies.'

We have sent details of the sites to you previously but to recap the live sites in your area are:

RCHD2301 – Central grid ref SD 95054 11082

BOLT01 - SD 6708 1150

BOLT02 - SD 6729 1165

I have attached site boundaries and proposed habitat and shp files for ease of mapping, and to inform you of the habitats that are being created.

I would be very grateful if you could get back in touch to discuss the above.

**7.**

Hello,

I would like to request that the below area of priority habitat as listed as a Habitat of Principal Importance (HPI) (potentially valuable wet woodland) is included within the LNRS as opportunity areas.

Habitats on this site are of huge value for biodiversity and provide connectivity to and from other opportunity areas or areas already of value to nature.

Centroid W3W ///wipe.vibe.froth

Please do let me know if you require any further information. Kind regards.

**8.**

Hi I attended a consultation event REDACTED today and had hoped to follow up on some information at home. However unfortunately I have been unable to access the interactive maps on my desktop - see photo attached, and the QR code on the leaflet elicits the response 'sorry we can't find the page you were looking for'. Can you confirm whether or not West Timperley Nature Reserve (see photo) is included in the 'Core local nature sites' map, also Stamford Brook Woodlands? Further, the Friends of Trafford's Parks and Green Spaces regularly liaise with Trafford Council regarding Greenspace strategy issues and I wonder whether there is recognition of the relevance and importance of parks and green spaces across Greater Manchester in the broader need to protect and enhance these sites?

**9.**

My written reply to

The Greater Manchester Local Nature Recovery Strategy- Public Consultation

REDACTED

My comments (in my own opinion) with respect to the (88 Page Document)- Nature for All --  
-A Local Nature Recovery Strategy for Greater Manchester

- Does the GMCA wish that those in power and all of the citizens of GM wish to continue to exist?
- Are the GMCA and its citizens aware that if the insect world collapses we will ALL collapse with it?

- The spring and early summer of 2024 had the least insects I have EVER noted on my daily wanderings recording wildlife a worrying occurrence that ramped up the recorded year on year decline in insects many Wildlife observers have noted in GM (and rest of UK)...the most obvious example of this is the year on year decline in that most 'once' common insect the Butterfly. It is glaringly obvious that there is a major problem with our wildlife caused by mankind's neglect of it...YET I might not despair if YOU GM apply without exception the 88 page documents aims---otherwise I'm afraid in not too many years the only thing to eat will be the documents produced saying how imperative it is to save the natural world (but which were ignored).
- It is stated that if there were no insects the WORLD environment would collapse...ecosystems would fail...humanity would fail...this plan for Local Nature Recovery therefore cannot be filed on a shelf with pats on the back by GM saying 'job done' when in truth the job needs to start now (in truth yesterday!).
- This 88 page document on the whole in its aims offers a way for us all to survive---BUT only if it is adhered to and enhanced for it offers a way for nature to survive---and as a reminder we humans are MERELY a part of nature the part that relies wholly upon the survival of the natural world we humans seem to happily ascribe as when we encounter it 'being in nature'
- Since REDACTED and now at the end of 2024 I can say of these species
- Corn Bunting from 22 territories there are now none
- Willow Tit I didn't even consider then that such as in 2024 there were only 3 territories left from a healthy moss wide population.
- Yellow Wagtail in 2024 their breeding territories have dropped from 41 to 30.
- Yellowhammer in 2024 their breeding territories have dropped from 40 to 26
- These birds represent good indicators of the continuing decline of farmland birds since I was first roaming the Moss (started REDACTED....)...
- A farm on Little Woolden Moss had until early spring one of the most sustained and vibrant House Sparrow populations on the whole of Chat Moss yet virtually overnight this colony collapsed to merely a handful and I personally (REDACTED) fear that there are now REAL indicators that nature in GM (and UK wide) is reaching freefall levels...not a good

omen for our own survival...are we IF this document is not taken with the utmost seriousness soon to join the path of these House Sparrow

- You state that this document will offer protection/enhancement to such as SBI's...am I to understand that that this document was commissioned by the same authorities that produced the GMCA Places for Everyone document that stated QUITE CLEARLY that Foxhill Glen SBI on Barton Moss would not only be protected but enhanced....YET this SBI REDACTED has been destroyed by the developer owner...leaving me to say from this experience alone that I have therefore grave concerns about the strength and effectiveness of the 88 page document you have produced in saving US ALL...
- I worry that in using such phrases in your document 'development must have regard to nature conservation' is missing the point of this LNRS entirely for we are not at the dithering stage of 'shall we shan't' we show some interest in possibly looking to consider nature as part of our future going forward...nature is TELLING US NOW THAT it is almost too late for it and therefore US to be saved...development is not going to save us only nature can do that...meaning it MUST be NATURE FIRST and foremost for LNRS to work!
- I note that some of the authorities are picking and extracting areas they 'might wish to 'develop' in the future---missing the point that this document is supposed to be a NATURE RECOVERY Document that HAS to see the WHOLE of GM as ONE single entity that requires ONE SINGLE minded approach to saving the natural world and as a consequence ourselves.
- Most importantly the survival of our world has but one obvious solution as far as we mere humans can muster and that is that we MUST be prepared to PAY and PAY heavily to protect it as our FIRST priority whatever our budgets for otherwise our prioritising of the NHS/Social Care/Lifting people out of poverty and much-much more on the agenda will all be meaningless if that which sustains us 'Good Old Mother Earth/the Natural world' is allowed to decline as I personally have witnessed during REDACTED. My electronic records held by the Greater Manchester Ecology Unit (the GMEU quoted in the 88page document as an important source of records for nature) will show that REDACTED and I can honestly say that the glaring proof of the decline of species I have noted within these records is frighteningly plain to see...

- There needs to be a massive education programme if this document is ever to work stating that if we do not prioritise mother nature then it and us will wither and die...simple as that..
- There perhaps needs to be a painful discussion with 'developers' that it's not forever concreting GM that will save us and perhaps that those of us who live and breathe daily the natural world that hangs on in GM that their top notch very expensive lawyers and their environmental experts (I remember at the PfE inspectors enquiry that one developers statement that a field to the north of City (Barton) Airport could NEVER be re-wetted for nature...this being an area that holds and has and continues to hold areas of quagmire/ Reedmace/ Juncas/ Phragmites---ALL clear indicators of how marshy this landscape actually is---) need to consider that their survival no matter where they live depends upon the sorely neglected natural world that is now at its brink of existence.
- The use of chemicals on our landscape in street weed clearance through to massive use on our farmed areas has obviously reduced the insect world...but has there ever been real studies to see how as each new super chemical is licensed what this continuing mix of chemical combined with chemical is doing ...is it accelerating decline of Natural World?
- The Charity The Lancashire Wildlife Trust (LWT) proved what should/can be done...This CHARITY had a long term plan for Chat Moss and its rare peatlands and have slowly but surely acquired tracts of land on Chat Moss that are now in the healing process for nature.
- Let me offer as example for the way forward for GM and its People--- the 108 hectare Little Woolden Moss LWT Nature Reserve of what CAN be done if NATURE is prioritised. In 2012 this site was but a brown desert which had been ravaged by Peat extraction which for the big developer landowner made a LOT of money at the expense of Nature (releasing tonnes of Carbon from a landscape that was STORING carbon. LWT secured funding to buy the site in 2012 and in only 12 years they are well along the road to bringing a full nature filled recovery to this reserve. This has taken a combination of LWT expertise/Grants hard fought for and gained/thousands of hours of voluntary work. REDACTED and these coupled with the records the LWT have gained for all aspects of this area and you will see that there is still time for GM nature to recover IF the 88 page document is pursued with the same dedication as the LWT.

The LWT in owning other reserves on Chat Moss have/had the vision for the future of this landscape in giving connectivity for nature something that the 88 Page Document needs to address viewing GM as ONE SINGLE Nature recovery area.

- I get the impression that you have been tasked with a real concern/job but in truth in completing this document you might be saying that's it Job Done rather than now stating that the Job really begins IF we are committed to save ourselves by saving and helping to restore the natural world...please prove me wrong for the sake of my (all our) grandchildren...and act not just shelve...
- In reference to the previous point may I point out that a list of 57 species which was compiled by the Greater Manchester Bird Recording Group and submitted for the draft Nature Recovery Plan has been omitted from the 88 page LNRS document. This to me is a worrying omission for the 57 Species are the measure of whether the aimed for recovery of this plan has or has not worked. Surely the LNRS is a REAL plan for the REAL recovery of nature in GM and as such must make a true effort in attaining and sustaining this recovery and not simply finding the easiest targets too attain and then signing off the document--- leaving the nature in GM in much the same parlous state it's in now. Please insert this list in full and then go all out to attain a real outcome for the LNRS.
- You rightly oversee and care for the GM population with such as Health Care/School provision and whatever else an authority needs to prioritise for the welfare of all—you now need to apply the same principles with respect to nature it's not an option its vital for ALL.
- Once more I see there is an obsession with access sometimes for all to roam....nature needs arms length...otherwise it dies out...we are doing this to heal nature and to do so it might include its isolation in order for its recovery---let this recovery be measured whereby a balance needs to be tipped in the favour of wildlife's wellbeing recognising that it's recovery ensures our very existence.

Natural England and the Lancashire Wildlife Trust are in this recovery of our GM natural World (and wider afield) for the long term and will continue to strive for Nature's Recovery but I feel if the whole of the GM authorities are not to take Nature seriously and prioritise it as a matter of urgency then all of the GM population will be following the Corn Bunting on Chat Moss and disappear..IT IS THAT SERIOUS.

REDACTED.

In my opinion and experience I would suggest that if the GMCA follow the pathway such as the LWT are following in nature recovery then there is real hope for this Green Recovery so vital for ALL...wildlife and people for we are ALL part of nature without which we WILL perish.

A Footnote...

Finally in my opinion it would be a measure of how successful this GMCA LNRS document proved to be if you were able to dispel my cynicism borne of decades of recording wildlife decline in GM with regard to such documents\* and initiatives previously produced and truly committed to the recovery of nature in GM...

For example The MOSSLANDS strategy Document published in 1989 in which the following was stated... The Mossland Strategy seeks to protect and restore an area of mossland habitat centred on Chat Moss.

May I remind you that soon after the landowner of Little Woollen Moss was given permission for Peat Milling which annihilated Pigeon Wood and the remaining mossland...108 Hectares of destruction of such rare habitat with ALL the Carbon Release (The LWT having purchased this in 2012 have started the slow recovery of this site ensuring that one day it will once more be storing Carbon whilst easing nature back to life).

Chat Moss off Twelve Yards Road (REDACTED) was also for the most part destroyed by Peat Milling which was permitted AFTER the publication of the same document....At present most of this site remains in the owners hands and offer a pitiful comparison with the nearby Little Woollen Moss LWT Nature Reserve...being for the most part neglected overrun by off road bikers and free roaming Dog walkers which has prevented any meaningful Wildlife Recovery (Red Listed Ground Nesting Birds such as Lapwing + Curlew failed in their breeding attempts due to such disturbance).

Therefore it would be seen in my cynical eyes as a way forward to save ourselves through nature if---

- GMCA listened and acted upon the knowledge offered by those in GM who observe and record wildlife in halting the decline of nature...
- Learn that all that Developers with their highly paid Barristers say, might not be in the best interests of our survival through Natures recovery

- GMCA Act upon this document's aim and prioritise the Natural World for ALL our sakes...

## 10.

Dear Local Nature Recovery Strategy Team

Save Greater Manchester's Green Belt Group has reviewed the Local Nature Recovery Strategy documentation, including the Greater Manchester State of Nature Report, with interest. Whilst we have not completed the consultation response form (for the reasons set out below), we do have several points to raise for your consideration.

- We have huge concerns that this is NOT a nature-led strategy, that will result in a distinctive nature recovery network. This strategy should be development-agnostic, but it seems that important nature-rich sites (such as Ryebank Fields, for example) have not been included if there is even a small chance that a developer is interested in the site, or if the landowner is interested in selling it for development.
- There is a need for more local knowledge to be included in the strategy, but local communities do not even know who is leading on LNRS for their areas and nothing has been published to share that information.

There is a lack of transparency about the process for identification of sites and associated inconsistencies:

- The process for identifying sites for nature recovery in each area is not clear or transparent and there is insufficient evidence available to communities to help them understand the approach taken in each district.
- Members have highlighted concerns that the participating authorities may not be acting consistently in determining the areas to be included or excluded from the LNRS.
- Communities would be interested in examining the data that underpins the targets, priorities and measures but that evidence does not seem to be available
- Communities should have been invited to 'sense-check' the evidence, rather than authorities assuming that the scope and accuracy of the data is accepted and valid, genuine participation and scrutiny through workshops with interested community representatives would have been valuable for all parties, with 'before' and 'after' maps, the rationale for inclusion/exclusion of sites.

- This sort of participation would have aided the consultation response as residents would be able to tease out what was evidence or data led, and what were the more subjective decisions, based on competing policy priorities.

Members have pointed out some incongruities in the Greater Manchester Nature Network Map, for example:

- a Site of Biological Importance in Trafford, which is highlighted as a Core Local Nature Site on the map, has had a planning application submitted to completely fell the woodland SBI and replace it with a 22m high warehouse.
- Sticking with the area known as New Carrington in PfE, land that has been allocated for development and Manchester United's training ground is highlighted on the map as Nature Recovery Opportunity Areas! Weirdly, the area surrounding the non-designated Manchester United Reserve is shown as a Nature Recovery Opportunity Area but the pool within the reserve itself is shown as grey?
- The 335-hectare deep peat moss at Carrington (considered irreplaceable and restorable by Natural England) is not shown on the map and surely would be a key nature recovery opportunity area.
- Historical/ancient orchards and woodlands are not shown on the map.
- Members are also concerned about ecology rich sites that are adjacent to proposed developments that will be impacted (which will in turn impact the success of the LNRS).

Link to Places for Everyone (PfE) Allocations:

- There was a complete lack of environmental and ecological evidence supporting the allocation of sites in PfE.
- Given the work done in advance of this consultation, it is surprising that so many sites that should be part of the LNRS have been allocated for development.
- Many of the PfE allocations were the locations in their districts that had the highest environmental or amenity value.
- There are significant concerns that developers will use the LNRS as a means to avoid Environmental Impact Assessments or to consider the value of ecology-rich areas reduced if they are not highlighted within the LNRS.
- There is a need to safeguard nature-rich sites that are not identified within the LNRS and clarity that non-inclusion does not downgrade the value of those areas in either nature or natural capital term.

## Reponse Questionnaire:

- The questionnaire is too long and unwieldy for many respondents, especially those with protected characteristics and other challenges.
- There is a rather misleading requirement to prioritise equally important aims and initiatives.
- Despite the findings of the Peat Pilot Report, there is no target for restoration of peat mosses.

The issues set out above have resulted in a perception that this LNRS has been handled in a rather piecemeal fashion, that it is just a tick box exercise and that there was limited value in residents attending the consultation events or responding to the consultation.

## 11.

Thank you for consulting Sport England on the revision of the Greater Manchester Local Nature Recovery. The following comments are provided to offer an overarching guide as to the expectations and role of Sport England and within the context of the National Planning Policy Framework (DLUHC 2024) and Sport England's Planning for Sport guidance and webpages. <http://www.sportengland.org/facilities-planning/planning-for-sport/> and further, more discussion with us is encouraged.

Sport England is the Government agency responsible for delivering the Government's sporting objectives. Maximising the investment into sport and recreation through the land use planning system is one of our priorities. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields. Sport England seeks to ensure that planning policy and practice will protect, enhance and provide for sports facilities and opportunities to take part in sport. Sport England has a Playing Field Policy in place for proposals affecting playing fields, you may find it helpful. A copy of which is available here: <https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/2021-12/Playing%20Fields%20Policy%20and%20Guidance%20%E2%80%93%20Last%20updated%20December%202021.pdf?VersionId=2gSKc.DNZ7CfiMQJQZTyBvpl2AMDljHn>

The Sport England Strategy 'Uniting the Movement (2021-31) identifies five Big Issues in the delivery of the strategy:

- Recover and reinvent: Recovering from the biggest crisis in a generation and reinventing as a vibrant, relevant and sustainable network of organisations providing sport and physical activity opportunities that meet the needs of different people.
- Connecting Communities: Focusing on sport and physical activity's ability to make better places to live and bring people together.
- Positive experiences for children and young people: Unrelenting focus on positive experiences for all children and young people as the foundations for a long and healthy life.
- Connecting with health and wellbeing: Strengthening the connections between sport, physical activity, health and wellbeing, so more people can feel the benefits of, and advocate for, an active life.
- Active Environments: Creating and protecting the places and spaces that make it easier for people to be active.

Sport England has assessed any consultations in the light of Sport England's Planning for Sport: Forward Planning guidance <http://www.sportengland.org/facilities-planning/planningfor-sport/>.

The overall thrust of the statement is that a planned approach to the provision of facilities and opportunities for sport is necessary, new sports facilities should be fit for purpose, and they should be available for community sport. To achieve this, our objectives are to:

- PROTECT sports facilities from loss as a result of redevelopment
- ENHANCE existing facilities through improving their quality, accessibility and management
- PROVIDE new facilities that are fit for purpose to meet demands for participation now and in the future.

Sport England believes that sport has an important role in modern society and in creating sustainable and healthy communities. Sport and physical activity are high on the Government's national agenda as it cuts across a number of current topics and the importance of sport should be recognised as a key component of strategies, and not considered in isolation.

It is essential therefore that the Greater Manchester Local Nature Recovery Strategy reflects and complies with national planning policy for sport as set out in the NPPF with

particular reference to Paras 96, 98, 103, 104 and 200. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land.

Sport England is concerned that there is the potential for playing fields to be identified within the draft Greater Manchester Local Nature Recovery Strategy for environmental improvements/biodiversity in a way that is incompatible with their use as a sports facility. Sport England has worked with the majority of local authorities in the Greater Manchester area to produce playing pitch and outdoor sports strategies. These documents are part of the evidence base of the district's Local Plans and should be used to help those preparing the Greater Manchester Local Nature Recovery Strategy identify existing playing fields and should then be excluded from the Greater Manchester Local Nature Recovery Strategy allocations.

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Sport England's 'Every Move' Sport England's Every Move strategy includes biodiversity as a priority theme as we seek to support the sports sector to become environmentally sustainable; [https://www.sportengland.org/guidance-and-support/sustainability?section=every\\_move\\_-\\_our\\_strategy](https://www.sportengland.org/guidance-and-support/sustainability?section=every_move_-_our_strategy) The document includes case studies of how community sports clubs have taken action (see page 29) to support biodiversity.

Sport England does not object to the Greater Manchester Local Nature Recovery Strategy encouraging sports clubs to increase biodiversity on their sites, but these are not appropriate areas for the following actions;

- creation of wetlands
- restoration of peatlands

- planting of trees and hedgerows
- more sustainable management of existing woodlands and other habitats like grasslands

It is these actions that the Government expects LNRS's to cover (See: <https://www.gov.uk/government/publications/local-nature-recovery-strategies/localnature-recovery-strategies>), so for this reason Sport England would not expect to find playing fields included within the draft Greater Manchester's Local Nature Recovery Strategy.

NB: This is unless, in the case of trees and hedgerows these are on the edge of the field and these do not affect the ability of the playing field or sports ground to function. It has not been possible for me to identify every playing field within the Greater Manchester Local Nature Recovery Strategy area.

I look forward to hearing more from you about how we can ensure that where playing fields are included in the Greater Manchester Local Nature Recovery Strategy in a way that is compatible with the community sports activity taking place on those sites. This document is important for planning purposes so it is important that this matter is addressed in the right way through consultation with Sport England (who are a statutory consultee on planning applications affecting playing fields).

Before any playing field sites are included consultation should also have been undertaken with the community sport users of that site.

This concludes our comments at this stage. Sport England would encourage further discussion of any of these points raised.

Please continue to consult us on our [planning.north@sportengland.org](mailto:planning.north@sportengland.org) email address.

## 12.

REDACTED is a local resident, passionate about nature and has spent a lifetime recording information about nature and wildlife in our area. His comments and responses on the above strategy are factual, accurate, relevant and important.

I concur with them.

The LNRS strategy is most welcome. However, as always in such documents, it appears to be largely aspirational and completely freestanding. How will it be put to effect? How will it affect and integrate with other policies such as planning? How high up the agenda will it be when planning decisions are being made on developments in what are currently greenbelt areas under threat?

The LNRS puts nature first and recognises both the positive potential of protecting and enhancing our natural assets as well as the profound damaging effects of not doing so, but how does it stack up against the insatiable thirst of developers and national and local government to concrete or brick over areas of natural beauty and irreplaceable habitats? Locally we have just lost 130 Hectares of Grade 1 farmland which was by definition “Irreplaceable natural wildlife habitat” for warehousing to be built on it.

I support all that the document covers, but it needs to be listened to. It needs muscle. It needs people like REDACTED to be listened to. There will be people like him in every area of the country (Thank Goodness) and they need a voice.

Hopefully this document (if its given enough exposure and promotion) can be a catalyst for change.

### **13.**

#### About BASC

BASC is the largest shooting organisation in the UK with around 150,000 members and our mission is to promote and protect sustainable sporting shooting and advocate its conservation role throughout the UK.

Sustainable shooting is an ally to the delivery of the LNRS objectives because it is a financial and social driver for the investment in the improvement of habitat extent and condition and its associated ecosystem services.

BASC has around 400 members living in Manchester itself in addition to those living in the rural areas within the Greater Manchester area. These are people who manage species such as deer, woodpigeon, grey squirrel and mink, and manage habitats such as woodlands, hedgerows, uplands and wetlands.

#### Shooting and nature recovery

We were pleased to read the section on 'Why Nature Matters' in the draft survey and its recognition of the natural capital and ecosystem services people benefit from and rely upon. BASC has produced two high level reports in 2024 on the social, environmental and economic benefits of recreational shooting that reveals some of the hidden values that shooting provides society.

BASC's inaugural Natural Capital Benefits of Shooting report places a value on the financial and social benefits the public enjoy from our natural environment due to shooting. We valued the carbon sequestration of the management of woodland, wetland and saltmarsh at £227 million in England.

Most of this value was associated with woodland habitat and it was roughly in equal measures of:

- the increase in habitat extent and better quality of woodland condition related to pheasant shooting leading to greater carbon storage; and
- the carbon-loss avoided through existing levels of deer and grey squirrel management, supporting successful establishment of woodland plantations and natural regeneration.

We note your recognition of the wellbeing and health benefits which translate to savings to NHS services in the draft strategy.

The Natural Capital benefits of Shooting report provided data on savings to the NHS and local authority budgets, being around £22 million in avoided physical and mental health costs. This is because the average person that shoots is more active and less lonely than the average citizen.

You also highlight the recreational value to people from nature and our Natural Capital Accounts also reveal the value generated by shooting is £495 million, £31 million of which is a benefit to everyone from taking recreation in areas managed for shooting which have a greater diversity of habitat and higher woodland cover than areas not managed for shooting.

The Natural Capital benefits of Shooting report also set out the value of shooting for domestic food and material security of £65 million a year for England. This comes from the shot food value of venison, pheasant, rabbit and so forth combined with the savings we give farmers and foresters through avoided crop and timber losses thanks to the control of

woodpigeon, deer and grey squirrel. In a time where food and material security are of rising importance, the role of shooting across the UK is also increasingly important.

The Value of Shooting is the second report published in 2024, and that valued the time we as shooters voluntarily put into habitat creation and maintenance alongside management of species that cause environmental problems at £450 million a year. It also set out that shooting is worth £2.9 billion the English economy.

Specific points to raise in your consultation

Overall BASC are supportive of the document for consultation. The following points are where we have specific comments of relevance to the plan or for the delivery phase that follows publication.

Woodlands, trees and hedgerows

We note that the status of woodlands in the LNRS area is challenging, with many in poor condition and a higher-than-average proportion unmanaged.

Management for shooting, especially game shooting and deer management, results in landscapes with more woodland extent and improved structure compared with land not used for shooting. This is a finding consistent in studies from the 1980s to the present day.

BASC's woodland management advice pack to members is aligned with Forest Research's woodland ecological condition criteria, to maximise the effort people who shoot spend on woodland management to improve ecological condition of woodlands as a whole.

The benefits shooting provides woodlands also extend to hedgerows, with there being more hedgerow length and more sympathetic management practices for nature on land managed for shooting.

Therefore, sustainable shooting, following best practice, is an important ally to the LNRS aspirations and an example of a wildlife friendly farm diversification opportunity.

What surprised us was that deer and grey squirrel damage were not specifically mentioned as action areas. Our experience of the other LNRS consultations to date is that these are specifically mentioned in the high-level strategy and the underlying action plans. The assessment and management of deer and grey squirrel are essential for woodland health and the success of new plantings and natural regeneration. We are expecting governments

strategies for deer and grey squirrel soon which will complement the existing public funding for their management through the Environmental Land Management Scheme.

We recommend a specific mention is added to the plan to show recognition for management of these species.

## Uplands

We were pleased to see recognition of grouse alongside livestock and water resources as examples of uplands being working landscapes.

Sustainable grouse shooting looks after peatland soils, maintaining high water tables and uses tools to manage the vegetation, including cutting and, where appropriate, managed cool burning to reduce the fuel load. This creates fire breaks and a mosaic of vegetation types and ages on which grouse and other priority species rely. This connects well with each of the priorities and measures within Appendix 7 relating to uplands, sustainable grouse shooting works alongside each one of those priorities.

The wildfire at Saddleworth moor covered 18 square km and was hugely damaging to the habitat above ground as well as the carbon rich peat soils below. Additionally, the catastrophic wildfire around the Corrimony Nature Reserve in May 2023 in Scotland underlined that wildlife risk is not mitigated by high water tables. Although we agree that rewetting peatlands is vital for carbon storage and nature recovery, it has little benefit to reduce wildfire risk. One of the critical factors in reducing wildfire risk and impacts is managing fuel loads, which is done through managed burning or cutting and removal and having wildfire mitigation plans in place.

A long-term study by York University compared management options for nature recovery and climate. This included non-intervention, cutting and leaving in situ and managed burning. This found that managed burning was a valid management tool in upland landscapes and because the study gathered data over a 10-year period it was able to study vegetation regrowth over a much longer-term than many other similar studies. It revealed the net impact on carbon in the soil was neutral to positive – effectively, managed burning over the entire cycle sequesters carbon.

We would hope and expect the LNRS to support appropriate use of managed burning as a valid management option in the delivery phase.

## Grasslands, farmlands and lowland heath

These are core habitats influenced by management for shooting. Longstanding and recent reports show that when a farm has shooting there are substantially more hedgerows, field margins and cover crops.

This aligns closely with the specific action 'Grow and maintain multi-species cover crops, and cut later in the year, to provide food and cover for wildlife'.

The actions set across the priorities under this group will be welcomed by the shooting community – they will support brown hare and grey partridge which are in themselves conservation priorities. Therefore, when considering delivery, those with a shooting interest are an important sector to engage with.

## Species priorities and actions

### Mountain hares

We looked at the actions for mountain hare and were pleased to see monitoring is a priority action. Annual surveys of mountain hares are now being undertaken where possible by a collective of gamekeepers across the Peak District area. This long-term, consistent approach to monitoring is vital to understanding trends in a species whose population is susceptible to inter-annual fluctuations.

We found the first action unclear. Fencing makes sense for livestock as high grazing pressure by sheep can drive declines in mountain hares due to competition for young heather growth. However, it makes little sense for predators of leverets and adult mountain hares. We would be happy to engage with you on the detail around this because where practiced sustainably, moorland management by upland gamekeepers facilitates the persistence of mountain hares in mosaic habitats.

Finally, as a cross reference to the uplands habitat priority, replanting schemes in or around upland habitats, it may be critical to specifically exclude hares (using appropriate tree tubes for example) to prevent damage to saplings and young trees.

### Water vole

BASC and the shooting community have been engaged in water vole recovery for over three decades and have substantial expertise in the area, providing training to volunteers and staff who need to humanely trap and dispatch American mink. BASC support many

regional water vole projects. We highlight the Waterlife Recovery Trust who have effectively eradicated mink from large parts of East Anglia through the application of modern technology and solid science coupled with volunteer engagement. It is a model other water vole projects should be learning from to apply in their areas.

Grassland ground nesting birds: Curlew, lapwing, twite, skylark, golden plover, dunlin, snipe.

This group of lowland grassland nesting wading birds share three reasons for decline. Insufficient habitat, habitat that is not correctly managed for them and losses of eggs and chicks to generalist predators.

The bespoke action 'Protection of nesting sites from predators, livestock and human disturbance using fencing, signage or other exclusion methods' is incomplete and needs to be paired with effective, humane predator control measures.

It is undoubtedly helpful to protect nests and eggs from mammalian predation using fences but once hatched the family become mobile and can forage outside of the fenced area and so these chicks are at risk from mammalian predators. Therefore, fencing alone will not fully or effectively address reducing predation.

The Curlew Recovery Partnership (England) is encouraging Defra to fund coordinated landscape scale management of generalist predators, especially fox and carrion crow because this is necessary to see sufficient fledging rates for curlew populations to stop population decline and start recovery. Therefore, we recommend including fox and carrion crow management as actions in addition to fencing.

## Reintroductions

We appreciate you listing the species requested to be reintroduced from public consultation and your thoughtful response to them.

BASC is supportive of reintroductions when they properly follow IUCN and England guidelines, they are landowner led and when there is effective provision for taking appropriate steps should undesirable outcomes result from a reintroduction. We are also keen that reintroductions do not overpromise the potential benefits during feasibility and the decision-making process whether to reintroduce, which are then not properly monitored for in the long-term to see if they did indeed occur or not.

We have a few comments on the species highlighted.

Defra's position on beaver protection and management is an essential reference. It has been the product of careful consideration and provides a full framework for deciding whether to reintroduce and how to consider, reduce and mitigate conflicts that beavers bring into a landscape. Specifically, the Defra position recognises that beavers can cause conflicts with local people and takes people through a process to avoid, mitigate or intervene to resolve issues.

Your approach to birds of prey is sensible and pragmatic. We would agree that red kites will spread into the region given time. What we applaud is your approach to pine marten. The correct approach is to improve woodland networks in readiness for their arrival because it reduces the risks of pine martens being killed when crossing roads. It also acts as another driver for meeting woodland cover targets.

BASC would like to see more evidence of the benefits pine marten bring to the reduction in the grey squirrel population, especially in relation to red squirrel recovery. Pine marten reintroduction projects in England and Wales have not provided evidence to date that predation on grey squirrel populations is reducing them to the point at which commercial woodland and woodland ecosystem damage is avoided or where red squirrel reintroduction could be feasible.

#### Final thoughts

We think it is critical that the mapping system for the final LNRS is easily accessible to individual estates and farms. They must be able to see quickly and clearly what the areas of particular biodiversity importance are and the various opportunities at the farm/estate scale.

BASC looks forward to using the final version of the LNRS habitat map to identify opportunities for its members to create or improve habitat most likely to provide the greatest benefit for nature recovery in Greater Manchester.

Thank you for the opportunity to listen to our feedback and congratulations on producing the draft strategy and supporting resources. Please get in touch if you would like to discuss our response.

**14.**

strongest point to make we think is that Ryebank Fields contain two LNRS priority habitats (Grassland, and Woodland/Scrub/Hedgerow) and that neighbouring Longford Park is (quite rightly) included in the draft Nature Recovery Network as an Opportunity area linking via Turn Moss to Ivy Green and Chorlton Ees Nature Reserve. When asked why Ryebank Fields was not also nominated, Manchester Council have told us that they have chosen to exclude everywhere that's in their SHLAA (Strategic Housing Land Availability Assessment ) from their proposed Nature Recovery Network areas.

The 4 main reasons we think this is unsound:

1. Manchester has double the amount of land it needs to meet Government calculated housing targets (see our recent fb and insta posts for more info on housing or email us to ask)
2. South Manchester has a measurable Nature Deficit, worse than North and East Manchester, according to Manchester Council's own reports
3. Inclusion in the SHLAA is no guarantee of development - it just means the landowner has aspirations to build, or there is a possibility. None of the Greenfield sites (which make up less than 2% of the land identified in the latest SHLAA) have planning permission to build on them at this stage.
4. Inclusion in the Nature Recovery Network does not prevent development. What it does is recognise and acknowledge a piece of land as potentially important to Manchester's Nature Recovery.

**15.**

To whome it may concern

I have been walking my dogs in this very safe beautiful place for 14 years. I have suffered over the years with REDACTED and I can honestly say this place has saved me. It has foxes, wild flowers, so much fruit grows there. Tree stumps in the centre for many a Picnic, a fairy tree, peace, birds singing. Please let us keep it If you visit yourself you will see and feel the magic Thank you

**16.**

I am writing to ask you to prioritise saving our beautiful, local, naturally rewilded Open Green Space of 11 acres, Ryebank Fields, and protecting them in the future.

Following the Lawton Principles to identify opportunity areas for nature recovery, I want to point out that Ryebank Fields is next to Longford Park and including both would a) support habitat management by providing a wildlife 'refuge' from the more managed parkland, and b) increase the size and resilience of the network, especially as Ryebank Fields has an even greater Nature value than the Park.

Regarding the opportunity areas for woodland, trees, scrub and hedgerow habitats, Ryebank Fields contains all three habitats, along with Neutral Grassland, and should be included in the Network along with neighbouring Longford Park.

On the opportunity maps for grassland, farmland and lowland heath habitats, Ryebank Fields contains acres of 'semi-improved' Neutral Grassland - along with woodland, trees, scrub and hedgerow. It should be included along with neighbouring Longford Park.

## **17.**

I'm responding as an individual however issues relating to REDACTED are of concern to REDACTED. The single line box within the online consultation did not give enough space to review my comments, to express additional suggestions on each habitat type or to suggest possible additional 'opportunity areas'. I am therefore submitting my response to the consultation in this attachment.

In general I agree with the proposed habitat restoration and enhancement actions, their locations, the priority species and suggestions for a nature recovery network and opportunity areas to better connect and enhance the role of protected sites. The stated closer alignment of the planning system with nature recovery and biodiversity net gain is, however, questionable. If nature recovery is to be given its proper weight and consideration by planners then the "Spaces for Everyone" consultation should have come after this nature recovery consultation. Planning Inspectors have now finalised development allocations uninformed by this commendable Greater Manchester nature recovery strategy. Some of the allocations already made in "Spaces for Everyone" diametrically oppose and conflict with the sustainable goals of the nature recovery strategy even when mitigation is applied. It should be noted that nature recovery protects future generations of Greater Manchester

residents from risks associated with climate change as well as attempting to stop species extinctions.

I also feel that the Nature recovery strategy lacks specific practical actions needed to deliver biodiversity gain in urban areas and that some important opportunity areas have been missed.

Nature network and opportunity areas.

Flood prevention / riverside habitat and opportunity areas in the Mersey Valley

It is clear that flood prevention, a healthy and safe environment for future generations and protection/ enhancement of biodiversity all go hand in hand.

West Didsbury (south Manchester) has been badly hit by the Jan 1st 2025 flood.

REDACTED we have recently responded to several inappropriate development proposals within flood zone 3 which are both dangerous and offer no biodiversity net gain. In the most recent local case (planning application 141813) the developer deliberately cleared large numbers of mature trees near to the Mersey without any ecological survey work prior to submitting the application so the applicant's Biodiversity Net Gain (BNG) proposal is based on a completely invalid biodiversity metric which fails to represent the habitat value of what has been lost.

I feel it is important to say that Planning Officers need to be aware that developers will try to avoid BNG obligations by means of pre- application site clearance . It is important that this issue is taken seriously and I feel the recovery strategy should contain a provision that pre-application clearance of habitat will attract severe penalties.

The Jan 1st flood demonstrated that local Mersey flood walls and defences which were well vegetated with shrubs or brambles or mature trees held up much better in the flood surge than un-vegetated flood banks which collapsed at 5 locations. We would advocate more nature based flood solutions and living flood defences within the Mersey Valley in south Manchester to aid resilience to flooding. We ask for no use of plastic mesh to bind flood banks- this gets ripped by mowers and risks entangling wildlife. The spread of Himalayan balsam has exacerbated flood bank collapse by shading out native species which are better rooted and help to hold surface soil in place ( in this context we would advocate a programme for community citizen weeding of balsam guided by GMEU, Environment Agency and Manchester council to avoid people pulling the wrong plants out).

The flood in West Didsbury highlights the lack of natural wetland vegetation and wet woodland in the Mersey flood plain, specifically within and around the numerous golf courses bounding the river in south Manchester. These large mown areas offer no hydraulic roughness to slow water flow and offer little habitat value. We therefore ask for new habitats of comprising belts of willow/ alder Carr and willow hydro hedges to be planted around golf courses in flood plains to offer a front line flood defence which will also trap sediment and provide significant benefits for biodiversity. Golf clubs also need to be encouraged to leave more areas of un-mown grassland in the valley. The increasing flood risk and rising water table is making some clubs less viable - perhaps those of those clubs which are struggling financially could be re-wilded to natural flood plain habitat and managed for biodiversity.

As an 'Opportunity Area' in the West Didsbury section of the Mersey Valley our Association strongly advocates the area of Fielden Park which lies in flood zone 3 behind Mersey Road to the north and fronts the river Mersey to the south. This area comprises of disused sports pitches of the former Hollies school. The location of the Hollies is SJ8391. The land is owned by the Britannia hotel title plan at land registry is - GM543972. Some, but not all, of this area is marked light green on the map of nature network for Manchester. The Hollies/Fielden Park lies on the line between several SBIs and Nature reserves including Chorlton Water Park and Fletcher Moss so would add connectivity to an enhanced nature network. The disused land here has already re-wilded itself into valuable areas of diverse wet grassland water meadow and willow Carr however infestations of knotweed are dominating ever larger areas. It would aid nature recover and water absorption if the old asphalt courts were lifted to enable these additional areas to naturally regenerate. The Hollies area is difficult to access and already hosts a good patchwork of different habitat types including wet water meadow, ruderal vegetation, bramble willow carr, ponds, reed bed, wet woodland and broadleaf woodland. Bird life is diverse here - tawny owls, kestrel and buzzard hunt here indicating the high biodiversity. The area is also used by priority species of foraging bats and swifts and a hedgehog was seen in summer '24 behind 'the Rookery' which lies next to the Hollies. The Hollies is waterlogged throughout the winter and forms a natural flood defence and flood water storage area. The dual role of this land as natural flood defence/flood basin and to promote biodiversity could be greatly enhanced with removal of areas hard standing asphalt and knotweed. The Hollies is still safeguarded by HS2 for a tunnel vent but this will never go ahead given the extent the Hollies flooded in

January and the total collapse of the flood defence. The Hollies is now an ideal candidate for enhancing connectivity between protected nature conservation sites.

We would also advocate that the Didsbury stretch of the Mersey is generally enhanced for biodiversity by provision of artificial king fisher nest boxes, sand Martin nesting banks, hawk and owl boxes, and discreet artificial otter holts to encourage recolonisation by otters. All nest provision would need to be inaccessible to mink and flood proof. The successful re-colonisation by otter should be a major goal for the Mersey as otters would naturally displace mink. Persecution and disturbance of otters would unfortunately be a potential problem however hidden holts away from areas of public access and the re-wilding of hard to access areas such as the Hollies could help provide safe cover. The provision of these nest sites could potentially be funded by BNG obligations and offer opportunities for study and ecological management by students at Manchester and Salford universities.

The restoration of upland moorland and planting of more woodland in cloughs and upland areas of Greater Manchester would positively impact us here in Didsbury due to prevention run off and alleviating the ever increasing flood risk in lowland city areas. Risk of flooding is being exacerbated by climate change and 1 in 100 year flood incidents have happened 3 times in Didsbury during recent years. I would advocate for planting of hydro hedges of willow Carr wherever possible including in the south Manchester Mersey Valley- these have been proven to alleviate flood risk around Kendal in the Lake District.

<https://www.facebook.com/bbccumbria/videos/hydro-hedge/257483768600508/>

Developments in all river and brook catchment areas needs to be discouraged due to exacerbating flood risk downstream - all such catchment areas need to be prioritised for habitat creation of woodland, scrub, meadow and hedgerows.

Other opportunity areas and nature network opportunities in South Manchester

The consultation does not give enough weight to the habitat and connective value of railway and metrolink embankments which form an extensive network of wildlife corridors through the city region connecting parks, green spaces and allotments, providing routes for wildlife such as hedgehogs to cross busy roads etc but are seldom managed with biodiversity in mind. Pruning / felling outside the bird and mammal nesting season and a sympathetic management regime of rotational coppicing for railway embankments could greatly boost species and nature recovery along these linear routes.

Specifically I would suggest that the Didsbury Spur metrolink is an important wildlife corridor with access to the Mersey Valley and mainline rail embankments at either end of the route. Wooded and vegetated stretches embankments are vital for badgers, foxes, bats and hedgehogs and should be managed accordingly with hedgehog highways and access holes created under perimeter fencing.

Albermarle allotments off Meltham Avenue in Withington, the allotments at Hough End and Hough End Fields all lie adjacent to the Didsbury spur metrolink and need to be shown on your map of important connected green spaces which deserve to be protected and enhanced as part of a nature network. Electricity northwest also own a small broadleaf woodland adjacent to the Didsbury Spur metro route and Hough End Fields at Weller Gardens in Chorlton - this woodland was awarded status as a 'biodiversity hot spot' by MCC and needs to be acknowledged and protected as part of the network . The woodland offers opportunities for wildlife enhancement in the form of bat, hedgehog and bird nest boxes, habitat piles etc.

Ryebank Fields is an important biodiverse natural area supporting diverse species next to Longford Park. Ryebank Fields is connected to Turn Moss and the Mersey Valley and should be included in the green network and biodiversity opportunity area map. Rye bank Fields are also an important local resource for recreation, health and well being. I feel this area needs to be conserved and not developed.

Habitat type - upland moorland

I welcome the proposed restoration of heathlands and upland peat areas around Greater Manchester by means of blocking up drainage channels to rewet these areas and by replanting bare peat. These actions will help to prevent fires, promote biodiversity and reduce flood risk. The flood of Jan 1st demonstrates that huge amounts of rain run off from the Pennines and elsewhere are descending from uplands and causing momentous flood surges in the Mersey. In this context I would again underline the value of hydro hedges and tree planting where appropriate throughout upland areas.

Habitat types of lowland grassland and mosses/ mixed habitats

I am extremely concerned to hear about proposals for a relief road through Carrington Moss (the only surviving lowland peat habitat in Greater Manchester)- this proposal would destroy a Site of Biological Importance and cause further degradation of the moss, generate

polluted run off as well as promoting unsustainable development. Carrington Moss peatland should be a priority area for nature regeneration and rewetting of the moss land and willow Carr plus protection of woodland SBIs in order to help prevent further flood risk, absorb CO<sub>2</sub>, and conserve resident endangered species such as willow tit, water vole and other legally protected mammals . Conservation and enhancement of Carrington Moss is vital for the health and wellbeing of future generations, would enable its vital role as a carbon sink to continue more effectively, save highly endangered species from extinction and ensure vital recreational opportunities.

The proposed development of Timperley Wedge under 'Spaces for everyone' intrudes into river catchment areas (Timpereley brook, Fairywell brook etc) and would increase flood risk downstream. I am not satisfied that the proposed nature park can possibly off set the damage caused by building on the larger part of this important area of greenbelt which has many ponds, a an ancient woodland (Davenportgreen Wood) on the Natural England Inventory, copses, scrub and biodiverse natural grassland which is habitat to hedgehogs, newts, amphibians, bats, invertebrates and diverse bird life. The decision for offsite compensatory improvements is often made by planning inspectors who don't appreciate the value and ecological services provided by existing greenbelt habitat such as at this location. Ecology surveys should not be left until after major strategic planning decisions have been made. Wildlife and biodiversity cannot just pack its bags and move to a new area.

#### Biodiversity enhancement in the wider city region of Great Manchester

Paved front gardens are a major factor in loss of biodiversity (such as hedgehogs and bird life) and increased water run off leading to more flooding as well as poor air quality and urban heat island effect. I believe that incentives in the form of a lower council tax band rating and lower water rates need to be offered to households who do not pave their garden or who have green off street parking in the form of reinforced grass surrounded by shrubs, trees and borders- such incentives could discourage the paving of entire gardens.

Manchester planning policy needs to deter the paving of gardens if the city is serious about nature restoration. My argument is supported by scientists at Sheffield University - <https://www.sheffield.ac.uk/news/cut-council-tax-green-gardeners-help-cities-tackle-climate-change>

Parks and open green spaces/ hedgehogs

MCC Leisure department has a large role to play in nature recovery and should be doing far more to promote biodiversity in Manchester Parks, cemeteries, open green spaces and sports pitches. Hedgehogs are an endangered priority species in need of urgent help- populations are rapidly declining in Manchester and very little is being done to help them locally.

As an example of excellent best practice Manchester should be emulating ecologists in Regents Park London who are surveying and conserving the park's local hedgehog population by providing habitat enhancements and hedgehog boxes in the Park. The video attached highlights actions for hedgehog (at 40) being taken in Regents Park which include- Leaving a 1 m wide strip of long grass and vegetation growing at the base of hedges for cover, not clearing fallen leaves from hedge bases or flower beds, creating new meadow areas for invertebrates, creating a mosaic of habitats include bramble and scrub, finger search long grass for hedgehogs before mowing it and manage areas of habitat in a hedgehog-safe way, leave deadwood on site in the park, create log habitat piles of deadwood for nesting hedgehogs, ensure permeability of all fencing by creating 13cm hedgehog access holes, provide ramps and exits from any pond with a sheer vertical edge, create small ponds around the park for water availability to hedgehogs in dry spells, 55 hedgehog nest boxes are hidden in scrub and bramble areas checked 2x per year, protect all hedges and plant new native hedges, in some places 2 hedges planted parallel for hedgehog cover.

Projects to survey for hedgehogs, conserve and improve hedgehog habitat in Manchester parks, cemeteries, allotments and green spaces should be a priority and possibly be undertaken in conjunction with local universities teaching ecology and habitat management as part of a practical module of coursework. RHS students could also take part. Surely there must still be parks and green areas in Manchester which support hedgehogs and more needs to be done to improve these habitats before it is too late.

The Royal Parks have a strong policy to promote and safeguard biodiversity and Greater Manchester should look to this example. <https://www.royalparks.org.uk/nature-wildlife/wildlife>. More standing dead wood monoliths should be left in parks wherever possible to benefit bats, woodpeckers, fungi, invertebrates etc and every park should be planted with a wide native perimeter hedgerow to maximise habitat connectivity to

surrounding areas. Larger areas of long grass need to be left and the public educated as to why.

I strongly believe that artificial grass and sports pitches need to be banned in Greater Manchester as they are now in the EU. Sheffield scientists call for a ban on astroturf- [https:// www.bbc.co.uk/news/uk-england-south-yorkshire-65375197](https://www.bbc.co.uk/news/uk-england-south-yorkshire-65375197). Artificial turf poses a huge array of environmental problems, pollution and loss of biodiversity, reduction in foraging areas available for a number of species including birds , bats and hedgehogs as well as toxic run off from the plastic base layer.

The use of Glyphosate should be banned in all Greater Manchester Parks. streets and footpaths it is extremely toxic to wildlife - it is better to have dandelions at the edge of a pavement or path than a brown strip of toxic poisoned vegetation. Glyphosate should be reserved for use on knotweed, especially in river valleys. I would suggest a partnership between RHS students, Manchester Universities and the council to train students to obtain proper licences to authorise use glyphosate as part of all round work experience in practical ecology and habitat management.

LED lighting should be strongly discouraged from use natural green recreational corridors such as the Fallowfield Loop cycle path and similar off road cycle paths through green spaces. LED lighting is now well researched and documented as highly detrimental to insect populations due to disrupting daylight and seasonal emergence and breeding patterns of insects including moths and butterflies; LED lighting also deters bat activity and delays dusk emergence from bat roosts.

Every new development and significant home extension should incorporate swift bricks, bat bricks and bat tiles. The council should also encourage churches in Greater Manchester to provide swift boxes and calling devices in towers and steeples- this could be done in conjunction with South Manchester Swifts, the RSPB and university students studying ecology.

Every new development should include a native perimeter hedgerow planting- West Didsbury Residents Association has been asking for this for years but invariably planners agree to timber fencing which has no biodiversity value, creates a barrier to movement of wildlife, is expensive and which will eventually rot.

With a few exceptions recently built tower blocks in Manchester are unsightly and offer no green space or biodiversity enhancement. All tower blocks need to use non reflective glass to avoid bird strike.

I think Manchester council needs to follow the example of the the Bosco Verticale in Milan- a high rise block clothed in trees and shrubs which is very beautiful and which promotes biodiversity in the city centre . It is described a model of sustainable building and vertical densification of nature within the city absorbing huge amounts of CO2 and producing tonnes of oxygen as well as attracting and sustaining bird and insect life. Please watch the wonderful you tube link attached. [https://en.wikipedia.org/wiki/Bosco\\_Verticale](https://en.wikipedia.org/wiki/Bosco_Verticale)

Thank you for listening to my additional comments, suggestions and concerns regarding Nature Recovery in Greater Manchester. The actions proposed in the strategy are commendable and well thought out however unless this strategy properly informs and guides 'Spaces for Everyone' and really delivers on the ground I feel that there is little hope of meaningful nature restoration in Greater Manchester

**18.**

Dear Sirs,

I represent the Manchester & Stockport Canal Society, a member organisation of the Inland Waterways Association - a National group promoting the restoration and improvement of canals in England, Wales and Scotland, particularly those canals not served by Canal & River Trust.

I wish to bring to your attention one glaring shortcoming illustrating the areas for Local Nature Recovery Strategy :

The Green corridor running north from Lower Gorton reservoir to the Ashton Canal between locks 10 & 11 at Claytonbrook Road - locally known as "the Yellow Brick Road".

This corridor is inadequately identified as just suitable for "Woodlands, Trees, Scrub and Hedgerow Opportunities".

It ignores the corridor's potential for "River, Canal and Waterbody Opportunities"

This corridor, some 2.0km long and was originally part of the route of the Stockport Branch Canal - used to carry goods all the way to Lancashire Hill, Stockport until the canal closed.

Manchester City Council (MCC) had the foresight to retain the corridor, turning it into a pedestrian way and cycleway. The Stockport end of this canal has been largely built over.

All the bridgeworks and land area associated with this section of canal are intact, indicating the historic intention that the canal could, at some stage in the future re-emerge as a water feature, as did the Ashton Canal in the late 1960s/1970s.

The Manchester & Stockport Canal Society (MSCS) was set up precisely to promote such an ambition and has received approval in principle from MCC and United Utilities to pursue the objectives of:-

- re-creating the canal, with associated waterway features along the corridor, with Lower Gorton reservoir at Debdale Park as a destination. This work would compliment the present footpath and cycleway
- hosting a marina on Debdale water for visiting boats from the wider canal network and providing a source of income for the future management of this regeneration.

The project has the wholehearted support of Mayor of Greater Manchester, Andy Burnham, who, as well as championing the canal's "blue/green" credentials, foresees the re-introduction of the waterway as substantial contributor to the development of sustainable urban drainage (SUDS) in the adjoining area.

A video describing this regeneration is available to view on <https://www.youtube.com/watch?v=xhjiYSuqrSw>.

Ten years ago, the Yellow Brick Road was an underused, dark and potentially dangerous route through Gorton and Openshaw.

MSCS and Sustrans began litter picking exercises along the canal corridor, slowly raising awareness of the corridor's green credentials - this has led to an increased interest and local care of the corridor, culminating in the improvements to the footpath and cycleway presently underway.

The regeneration of the canal, alongside the footpath and cycleway will create the following Nature Recovery benefits:-

- Create a Blue/Green corridor along the route from the Ashton Canal to Lower Gorton reservoir.

- Provide a greater variety of trees and shrubs along the route, diversifying the primarily mono culture vegetation that presently exists.
- Improved Bio Diversity and habitats along the route by the introduction of side ponds and wetlands along the canal side.
- Create opportunities for sustainable urban drainage (SUDS)
- Open up the corridor to more use, continuing to reduce the anti-social aspects of the pathway which existed historically and still persists in places along this nature walk.

The re-introduction of the canal and marina has the unique combination of not only improving the Natural Recovery of the corridor, but brings with it an income stream from mooring fees and income generation to the area.

This will not only to maintain the waterway but to make a major, if not full contribution to the upkeep of the corridor as a whole.

Continued maintenance is a vital element generally lacking from all well meaning proposals.

There are no published management plans for future arboricultural management of the present corridor and the substantial growth of self-seeded trees will continue to take place, reinforcing the monoculture and limiting the biodiversity of this Green vein running through a heavily urban area.

Would you please include this project in your Natural Recovery Strategy.

Over the years, several reports on the ecological, engineering and commercial viability of this improvement have been commissioned, published and issued to several MCC and GMCA members and staff.

If you require sight of these in support of our case, please contact the writer at: REDACTED

The Society's main obstacle to realising its objectives is the lack of formal approval from the "powers that be".

This absence limits our opportunities to seek the finance necessary to achieve these objectives – all we seek is formal acknowledgement and support for this project.

With the support of Manchester City Council, the wider Greater Manchester Combined Authority, and the the Inland Waterways Association supporting our Society, we have the track record to make this happen,

The regeneration of the canal and its environs will better serve the locality than simply limiting its green credentials to "Woodlands, Trees, Scrub and Hedgerow Opportunities".

## 19.

Please find below a considered response from Bolton and Bury Swifts Conservation Group, which focuses on Swifts and House Martins within the GM Strategy. Under the section:-

\*Working together to take action for nature and embed space for nature and people to thrive across all our communities\*

And "Urban"

We disagree with the plan and would like to submit the following:-

Building-dependent birds are overlooked by the main priorities and are also overlooked by DEFRA net gain methodology.

Text relating to Swifts and House Martins is of course very welcome but our group would request further specifics in terms of the wording for these declining Red List species as current wording in the plan is brief and does not spell out in detail what Local Authorities can and should do.

"The existing nest sites of Red List Swifts and House Martins will typically be located in or on buildings;

these should be retained and protected where possible, and mitigation provided when retention is not possible;

Nest boxes should be integrated \*swift bricks\* where possible; these are universal nest bricks for cavity-nesting small bird species, they're permanent with no maintenance requirements and unlike Sparrow Terraces they can be used by Swifts and Sparrows alike.

New build development including extensions should follow best-practice guidance such as British Standard BS 42021, which promotes Swift Bricks as the integrated bird brick to use.

Artificial nest cups for House Martins may be installed instead where recommended by an ecologist.

Further note

Our surveys show existing colonies are frequently (but not exclusively) found on Social Housing. Any works to the exterior of the buildings by Housing Associations and Local Authorities should include appropriate mitigation, by retaining open eaves style or provision of Swift Nest boxes or bricks and take place outside the breeding season of May to August.

## **20.**

### Collated responses from BGU Members to GM Local Nature Recovery Strategy Consultation

Bolton Green Umbrella supports over 100 member groups and individuals to promote making Bolton a cleaner greener town for all its residents.

We discussed the draft Local Nature Recovery strategy at the BGU January meeting, encouraged individual groups to complete the online questionnaire and asked for their key points about this strategy which have been collated below. These collated responses have been shared with: Greater Manchester Combined Authority on [naturerecovery@greatermanchester-ca.gov.uk](mailto:naturerecovery@greatermanchester-ca.gov.uk) REDACTED.

REACTED members of the BGU Committee went to the consultation session at Moss Bank Park on 7th January 2025.

#### Collated Responses from BGU Member groups:

1. Overall BGU members welcomed the vision, key aims and headline targets in the strategy.
2. There are concerns that without an implementation plan and regular independent panel reviews the strategy may not make a real improvement, particularly if it remains a stand-alone policy at both GM and Local Authority levels. The strategy needs to be monitored to demonstrate success, develop and share best practice. All regional and local authority environmental, planning and other enabling strategies, policies and plans need to be compatible and coordinated with this strategy, for example GM SuDS strategy, Integrated Water Management Plan, Local Authority Local Plans and land allocations for housing.
3. BGU members welcome the emphasis on creating connected networks of green and blue nature areas. In the Bolton many of the opportunities to restore nature need to focus on a. river valleys, for example Middle Brook, Eagley, Astley and Bradshaw Brooks, Rivers

Tonge, Croal and Irwell, and b. upland moorland areas, for example Smithills, Turton Heights and Affetside

4. Improved access to more bio-diverse habitats for wildlife and to nature for local communities is seen as essential. Underinvestment in footpaths, tracks and signage has resulted in their poor condition and barriers for people to reach nature, particularly for those with mobility issues. Upgrades to footpaths would allow improved access and help to prevent erosion to river banks, and damage to other habitats, native plant and wildlife.

5. The removal and management of invasive species e.g. Japanese Knotweed, Himalayan Balsam and Giant Hogweed is a major issue in Bolton for the recovery of natural species and damage to bio-diversity. These aims need to be emphasised more strongly in the strategy. See appendix 1 - Report on JKW treatment

6. Improved and more extensive aquatic habitats are essential for nature restoration and to support adaptation to climate change. Examples include a. modification or removal of river obstructions e.g. weirs b. restoration of canals and greater use of Sustainable Drainage Systems to minimise surface water flooding and resulting damage to nature c. improvement of water quality to support richer bio-diversity

7. Volunteers and engagement with local communities on improving their local environment are essential for achieving nature restoration within Greater Manchester. Scarce resources over the next decade locally and across the UK make this a vital element of improving the environment. This needs to be reflected more strongly in the strategy. Add Appendix 1 - JKW Eradication Programme on Irwell River Catchment, Review 2022 – 2024  
[Japanese\\_Knotweed\\_Review\\_2022-2024\\_Report.pdf](#)

**21.**

Dear Sirs,

Nature for All---A Local Nature Recovery Strategy for Greater Manchester

I have completed the questionnaire on-line as required, but I have found the process unacceptable for several reasons, which I detail below. To limit online document responses from the public to 600 characters (not even words) tells me that the process is literally a box ticking exercise - as is having to choose one preference from a list of equally vital choices. Anyway, I state my commentary below and I will send a copy to Andy Burnham.

Local Nature Recovery is much needed, and this strategy helps. The document needs to carry the same weight as the PfE (Planning for Everyone).

I have slogged through the strategy document and found it overwhelming. Its set out, type style, type-size and type colour - all make reading the document very difficult to follow.

The template document for public feedback is mostly a tick box summary document that in effect asks - "which of our great proposals do you most agree with most?" It concerns me that ticking a box as a preference implies that I agree with the proposed percentage improvement and the time to do it as stated on the list.

In my opinion most of the performance targets indicated in the document are too modest and the ten years period that could be used to measure achievement or failure is too long. The strategy to Improve Nature Recovery is good, but the recommendations fall below what Greater Manchester needs for proper Nature Recovery.

I would like to see specific targets reviewed bi-yearly with Key Performance Indicators (KPIs) put into the public domain every year, to measure performance.

This document has been produced with the assistance of many fine collaborators. I would like to see the brilliant naturalist REDACTED added to the list of future contributors as the plan grows into a living entity. He has walked, observed, and reported on wildlife in Salford, Manchester every day for decades. REDACTED specifically visits the peat and moss lands of Irlam, Cadishead and local areas (Chat Moss). His daily findings are well documented, reported and known to the Salford Council. In my opinion, the reports are devastatingly clear - this part of Greater Manchester has been appallingly neglected and often deliberately depleted of the resources so vital to sustain wildlife. His detailed notes on the decline and often extinction of local birds is vital to this investigation that plans to Recover Nature.

Good luck with this worthy cause. I do hope that it brings forth a better environment for our children and nature. I must however comment that the percentage improvement targets over ten years for Nature Recovery are uninspiring, unchallenging, and disappointingly low.

## **22.**

When asked whether I agreed or disagreed with your plans, of course I agreed every time. All your points represent excellent ways of protecting and enhancing

nature. However, in many cases I would like to have been able to comment. Prior to starting the response pages I had made a list of brief items that our group felt were relevant to swifts. In the Land Use section I would have like to have mentioned swift bricks in new buildings and general bird habitats in or adjacent to buildings. I'd like to have seen more emphasis on the use of private gardens to encourage wildlife. This is a massive resource and insect life is vital for swifts. They could live more easily in urban areas with nest boxes and insect habitats. Insects are the basis of all nature and I'd like to have seen a far greater emphasis on their needs.

## **23.**

Dear Sir/Madam,

I write on behalf of Peel Land to submit representations to the Draft Greater Manchester Local Nature Recovery Strategy consultation. Representations are provided below which cover the specific points which Peel Land would like to discuss further with the GMCA, rather than the completion of the standardised consultation form.

This representation is accompanied by a note from our ecological advisors TEP who have provided the technical ecological advice in respect of the sites discussed during Plan promotion and planning applications.

### **Peel Land**

Peel Land is a leading UK strategic land business specialising in the acquisition, promotion, management and delivery of development opportunities across multiple sectors including residential, commercial, logistics, health, digital, leisure and culture. Peel Land owns extensive land assets across Greater Manchester and is an active stakeholder and partner to the GMCA and the conurbations local authorities.

### **Places for Everyone**

The Places for Everyone Plan (PfE) is a Joint Development Plan for 9 out of the 10 Greater Manchester Authorities prepared by the Greater Manchester Combined Authority (GMCA), supported by the individual Local Authorities. It sets a plan for strategic growth of the conurbation to 2039 and delivering its aspirations are critical to the success of Greater Manchester.

PfE plans for the delivery of 175,000 homes and employment floorspace and identifies specific sites for development to meet these targets. Peel Land own a number of these sites and are actively taking them forwards for development in the short and medium term. This includes:

1. Chequerbent North (Policy JP Allocation 5)
2. Elton Reservoir (Policy JP Allocation 7)
3. Bamford/Norden (Policy JP Allocation 17)
4. Hazelhurst Farm (Policy JP Allocation 24)
5. East of Boothstown (Policy JP Allocation 25)
6. North of Mosley Common (Policy JP Allocation 32)
7. West of Gibfield (Policy JP Allocation 34)

Alongside development targets, PfE also seeks to protect and improve Greater Manchester's (GM) most valuable green spaces (Policy JP-Strat13: Strategic Green Infrastructure) and defines the conurbation's most important 'Green Infrastructure', including river valleys and waterways (Policy JP-G3); lowland wetlands and mosslands (Policy JP-G4); uplands (JP-G5); and, trees and woodland (JP-G7). It promotes the efficient use of land, reflecting the need to identify land for development alongside protecting these environmental assets.

PfE was developed using an extensive technical evidence base including ecological assessments of every site by the Greater Manchester Ecology Unit (GMEU) and each of the sites promoted by Peel Land were also supported by detailed ecological assessments by TEP. PfE was assessed at an Examination in Public by independent Planning Inspectors who considered the balance of development needs against the need to protect ecological assets. Therefore, the sites allocated for development have been done so with the full knowledge of the ecological assets they hold and decisions have already been made about where development needs supersede ecological protection. The PfE allocations should form the baseline from which other designations are made on these sites.

Furthermore, each of the allocations will be taken through the planning application process and the planning applications will need to be supported by detailed ecological assessments and Biodiversity Net Gain (BNG) strategies. These will take account of existing ecological

designations and areas for protection and mitigation will be identified for valuable ecological assets.

### Core Local Nature Sites

Core Local Nature Sites (CLNS) are identified in the Draft LNRS as 'The best remaining wildlife sites across the city-region...They are sites that are already designated to some degree for their value for nature' (Page 41). The objective is to 'Improve their condition through better management. At the same time, we need to identify opportunities to expand and better connect these sites' (Page 41).

A number of the CNLS are identified on sites that have been allocated through PfE for development. These areas will not be able to deliver the objectives of CNLS as they are planned for development. There is therefore a direct conflict between the aspirations of the GMLNRS and the development aspirations of Greater Manchester identified in PfE.

### Elton Reservoir and West and Gibfield

Elton Reservoir (PfE Policy JP Allocation 7) and West of Gibfield (PfE Policy JP Allocation 34) include CLNS areas. Both of these sites are allocations in PfE which include areas of retained Green Belt. These areas of retained Green Belt are protected from development and therefore there is no conflict between the CLNS designations in these parts of the site and the purposes of the PfE allocation. However, CLNS are also identified in the parts of the sites that have been allocated for development. The requirement to protect these areas as CLNS will therefore not be achievable and so the designations should be removed in these areas. Peel Land objects to the designation of these areas on this basis.

Extracts from PfE and the GMLNRS maps for these sites are provided at Figures 1 and 2 to illustrate the conflicts.

Figure 1: Extract from PfE policy for Elton Reservoir and Extract from GMLNRS Map for Elton Reservoir

Figure 2: Extract from PfE policy for West of Gibfield and Extract from GMLNRS Map for West of Gibfield

### Hazelhurst Farm

Hazelhurst Farm (PfE Policy JP Allocation 24) also includes a CLNS. Hazelhurst Farm is not only an allocation in PfE for 400 homes but there is also a currently live planning

application with Salford Council for its development. The CLNS predominantly covers Wardley Wood, which is retained Green Belt land, but it strays beyond this area at the north of the site. This is based on out of date information and so Peel Land object to the inclusion of this area in a CLNS.

The parcel of land outside of the Green Belt was previously identified as a lowland fen priority habitat. However, a detailed ecological survey of this area was undertaken by TEP and a site investigation by e3p. These found there is not peat in this area and the habitat cannot be considered a lowland fen priority habitat. The surveys were reviewed by GMEU during the preparation of PfE and as a result this area was removed from the Green Belt and allocated for development through PfE. The CLNS should also be updated to reflect this position. Extracts from PfE and the GMLNRS maps for this site are provided at Figure 3 to illustrate the conflict.

Figure 3: Extract from PfE Policy for Hazelhurst Farm and GMLNRS Map for Hazelhurst Farm

#### Manchester Ship Canal at The Quays

An area of the Manchester Ship Canal between The Quays and Trafford Wharfside has been identified as a CNLS (Figure 4). This area forms part of the Core Growth Area (Policy JP-Strat1) in PfE where economic growth should be protected and enhanced. Peel Land is concerned that the CNLS designation could lead to restrictions that could impact upon future development aspirations of the Core Growth Area. Peel Land is also concerned that the designation could impact upon the commercial operation of the Canal.

Figure 4: Extract from GMLNRS Map for the Manchester Ship Canal at The Quays

#### Nature Recovery Opportunity Areas

The Draft GMLNRS has also identified Nature Recovery Opportunity Areas (NROA) 'Where action to enhance, restore or create different habitats...would expand and better connect our core local nature sites' (Page 43). 'These areas are not designated or protected, nor are they barriers to development. Development within these opportunity areas (or where it could have an impact on these areas) should seek to support and deliver priorities set out for these areas and help towards the wider ambitions of the Nature Network' (Page 43).

Most of Peel Land's landholdings identified in PfE include NROAs. Peel Land would like the opportunity to discuss with GMCA the designation of sites as NROAs to better understand the commercial impacts and how they link to BNG and landscape strategies as part of the GM Nature Network. In this regard, as we consider there are a number of areas that would benefit from clarification:

- a) The identification of an NROA does not change or add to the development plan status of any site pursuant to Section 38(6) of the Planning and Compulsory Purchase Act 2004
- b) The NROA designation does not act as a barrier to the development in any way
- c) The identification of an NROA does not itself have a determinative influence on a site suitability for development in principle
- d) Where the nature recovery opportunity presented by a site cannot be realised in the context of development coming forward, this should not itself be determinative as to the acceptability of the development reflecting that the GMLNRS is not part of or supplementary to the development plan
- e) Where development within an NROA is able to make a positive contribution to nature recovery in accordance with the GMLNRS, this should be given positive weight in the planning balance over and above any wider biodiversity gain outwith the ambitions of the GMLNRS.

Added to the above, the LNRS should clarify that, in most cases, and in the absence of any ability to enforce the delivery of the LNRS via any other means, development will provide a principal vehicle for delivering the LNRS and, to this end, the LNRS is fundamentally reliant on implementation of PfE and Local Plans which flow from this.

#### Other Peel Land Landholdings

1. Hulton Park, Bolton: Hulton Park is identified in the GMLNRS as including both CNLSs and NROAs. This site has extant planning permission (Bolton Council ref: 12218/21) for inter alia 1,036 and a golf resort. The objectives of the CNLSs in this area cannot be delivered because they conflict with consented development plans and therefore they should not be designated as such.
2. The Quays and Trafford Wharfside: Some small areas and strips of land have been identified as NROAs across The Quays and Trafford Wharfside area. It is not clear why

these specific areas have been identified and not others, so it appears inconsistent. Peel Land would like the opportunity to discuss the rationale behind these designations further.

## Summary and Conclusions

Peel Land object to the inclusion of CLNS on areas already identified for development through PfE, as the aspirations are not deliverable. We would like the opportunity to discuss this interrelationship with GMCA, alongside the implications of NROAs on our landholdings. Peel Land would welcome the opportunity to discuss these representations further with the GMCA and respectfully request that you contact me on REDACTED to arrange a meeting.

## 24.

Q1 Organisation

Q3 Community Group

Q4 GM wide

Q9 FRIENDS OF RYEBANK FIELDS

Q10 ryebankfieldsfriends@gmail.com I understand that my response to this consultation will be anonymised and published, along with all other responses to this consultation.

## VISION AIMS AND TARGETS

- Q11 prioritising the 6 aims – it is difficult to prioritise, but if considering urgent versus important it's probably safeguarding, enhancing and restoring what we have – but very important then to be improving local access to nature and ensure there are more opportunities to enjoy nature, in areas that need it most.
- Q12 Are they the right aims for GM – Agree.
- Q13 Somewhat clear – they are very interlinked so it feels difficult to differentiate and prioritise.
- Q14 prioritising the 6 targets – 'increase of resident access to green space' BUT see Q15.
- Q15 comment on the targets DISAGREE – "Increase the number of residents living within 15 mins of decent green space" poorly worded as doesn't define what kinds of green spaces – it would be possible to achieve that by building tower blocks next to a bowling green, or building high density homes on half of a nature space like Ryebank Fields. It's

important to define a need for access to natural and semi-natural spaces with \*biodiversity value\* as distinct from recreation grounds, parks and gardens.

- Q16 comment improving access to green space (BUT NB should be 'nature space' instead of green space) within a certain distance.

### Section 3. Priorities and Actions

#### Woodlands

- Q17. Are these the right priorities for woodlands, trees, hedgerows and scrub habitat in GM? Agree
- Q18. Which of these priorities do you think is the most urgent? Option 1 Safeguarding existing spaces AND Option 3 street trees/urban woodlands/improving access/climate resilience.

#### Grasslands

- Q19. Are these the right priorities for grasslands, farmland and lowland heath habitats in GM? Agree
- Q20. Which of these priorities do you think is the most urgent? Option 1 Safeguardin.

#### Urban green spaces

- Q23. Are these the right priorities for urban green spaces and buildings in GM?
- Q24. Which of these priorities do you think is the most urgent? Option 2 Better Parks and Open Spaces, enhanced and managed to be nature rich.

#### Species

- Q29. Are these the right species and species groups for Greater Manchester? Agree.

Q31. Which of the priorities could you possibly help take action towards and how? Ryebank Fields contains Woodlands, Trees, Scrub and Hedgerow and also semi-improved Grasslands.

We are continuing the decades long fight to Save Ryebank Fields in perpetuity, for example by having it designated as a Local Green Space, or ownership reverted to the people, or some other vehicle appropriate to the original intent for it was purchased, with Public (City Council) funds money around 60 years ago, for educational and recreational purposes.

We also record wildlife we observe in the Fields and spread awareness on our social media channels about nature more generally, encouraging increased understanding of nature and how to protect it. On a practical level we act as custodians of the Fields, including activities like picking up litter, preventing anti-social behaviour, reporting fly tipping or other incidents to the landowners.

Given the opportunity we would love to divert our energy and enthusiasm towards working with a coalition of MMU, UoM, Salford University and other research and educational institutions to set Ryebank Fields up as an opportunity to study passive rewilding in an urban context at degree and postgraduate level. This approach could have national reproducibility and impact, as there are many such sites across the country that could benefit from any research done here.

There are also opportunities to explore the adaptations of urban mammals living under pressure in a densely populated human environment, in ways that alter their normal behaviour yet seemingly thriving nevertheless. Professional ecologists often find the Fields remarkable in the levels of wildlife activity and behaviour observed.

We would love to formalise public access on the Fields again, and to improve their accessibility to all groups present in the local community through events and initiatives, in particular around engaging young people in outdoor learning and citizen science, and giving them a chance to learn about the wildlife on their doorstep that's typical of the UK as a whole. People can only protect what they know. We would aim to increase access to the Fields by local people from different backgrounds who don't currently visit.

We would also like to explore, with the cooperation of the landowners MMU, the different options for habitat restoration at Ryebank, including the potential for the meadow areas to be managed to unimproved grassland – a habitat that's vanishingly rare, with 95% having been lost in the UK since 1970. The two grassland areas (football pitches 3 decades ago) currently provide important habitat for pollinators, and foraging opportunities for the animals that live amongst the woodland and scrubland, as well as for birds of prey that pass over the Fields and nest in the woodland.

The Aspen grove also has potential as a unique and notable feature, so unusual even in Scotland (where it is more prevalent) that they have whole conservation teams dedicated to restoring the Aspen population and the ecosystems they support. The Aspen could be a potential breeding site for future reintroductions of rare invertebrates.

## SECTION 4: NATURE NETWORK

Q32. Do you support the use of the Lawton Principles to identify opportunity areas for nature recovery? Yes. Ryebank Fields is next to Longford Park (which is - rightly - included in the Draft Network) They form an important corridor connecting the wildlife of Broad Ees Dole via Turn Moss and Chorlton Ees up towards Old Trafford and East towards Whalley Range. Including Ryebank Fields with its high nature value in the Nature Recovery Network would support habitat management by providing a wildlife 'refuge' from the more managed parkland, and would increase the size and resilience of the network.

Q33. Do you have any feedback or insights regarding the opportunity areas for woodland, trees, scrub and hedgerow habitats? Ryebank Fields contains all these habitats, along with Neutral Grassland, and should be included in the Network along with neighbouring Longford Park.

Q37. Do you have any feedback or insights regarding the opportunity maps for grassland, farmland and lowland heath habitats? Ryebank Fields contains acres of 'semi-improved' Neutral Grassland - along with woodland, trees, scrub and hedgerow – and could be managed towards the vanishingly rare 'unimproved' grassland habitat. It should be included along with neighbouring Longford Park.

Q38. We are exploring how we could improve our mapping of actions for urban areas, which of the following areas would you prioritise? Some of the most nature depleted areas are in the least socioeconomically deprived parts of the City, because of the impact of land use and pressure to build on every scrap of land. However young families and ageing communities whatever their income desperately need and value access to nature on their doorstep. For that reason, we would prioritise where there is low access to nature spaces, regardless of other factors. However of these choices offered, our community are particularly concerned about air quality and it tends to cooccur with the other factors named so we would prioritise 'low green space and poor air quality'.

It is important to say here that we have some concerns about the consultation process, outlined separately in the email to which this is attached. However, thank you for the opportunity to comment, and for the work of the team at GMCA in coordinating this extensive piece of work including the technical challenges it doubtless involved.

**25.**

Friends of the Earth is an environmental organization that works nationally and globally to create a more sustainable future. We campaign for climate justice, environmental and social justice, and the protection of the world's oceans.

Manchester Friends of the Earth is a Licensed Local Group of Friends of the Earth, England, Wales and Northern Ireland. We are fuelled by volunteer energy and we campaign on a wide range of environmental and social issues.

The decline of nature and biodiversity is an ecological emergency that requires urgent action.

We welcome the opportunity to respond to the Greater Manchester Local Nature Recovery Strategy consultation. For brevity we will refer to the consultation document as GMLNRS throughout our response.

Overall, Manchester Friends of the Earth supports the development of the Greater Manchester local nature recovery strategy.

We are responding to the consultation via email as we would like to raise specific issues that do not fit well within the online consultation framework.

Our consultation response consists of 6 sections, outlined below:

- 1) Targets
- 2) Access to Green Space.
- 3) Nature pollution hotspots and inequalities
- 4) Priority species
- 5) Lawton Principles, priorities and delivery
- 6) Greater Manchester Nature Network map.

Thank you for your consideration and we look forward to seeing the consultation report and final GM Local Nature Recovery Strategy and delivery plan.

- 1) Targets.

The GMLNRS consultation asks respondents: Which of the targets do you consider the most urgent?

- \* Increase the amount of land designated for nature from 11% to 15% of the city-region by 2035
- \* Bring 50% of our Local Wildlife Sites into active management for nature conservation by 2035
- \* Work towards the restoration and creation of 1,800 hectares of wildlife-rich land by 2035
- \* Expand our tree canopy cover from 16.5% to 18.5% by 2035
- \* Target the delivery of new wildlife-rich land and tree planting within the Nature Network
- \* Increase the number of residents living within 15mins of a decent green space
- \* Don't know.

We understand why this approach has been taken as Local Nature Recovery Strategies are supposed to focus on what is most important.

However, this can mean that everything else tends to be downgraded or left out even if it has a very important local role.

For example, in the section on habitats and species there is a list of priorities but no discussion about how these might be linked.

Manchester Friends of the Earth wants more tree cover and for existing woodlands to be in good condition because this helps deliver a range of benefits e.g. supports a range of other species, helps address air quality (to some extent), provides urban cooling, plays some role in reducing flood risk, and so on.

However, this does not necessarily make more tree cover and better condition woodland more important than the other actions / targets outlined.

Whilst, this is a general point it highlights a concern we have with how the consultation questions are framed. It asks general questions which unless we can drill down into localised areas of need (i.e. where there is a lack of existing tree cover, green space, habitats for particular priority species which could be brought back), then it risks being too vague and non-specific.

Or in other words, is there a risk that the GMLNRS is so 'strategic' that it loses sight of what's needed on the ground in very localised areas which can be mapped, and targeted for yard-by yard / ward-based action?

## Access to Green Space.

The Natural England Accessible Greenspace Standards define good provision based on different size, proximity, capacity and quality criteria detailed below:

Within 15 minutes' walk: EITHER a Doorstep OR Local Accessible Greenspace.

- A doorstep greenspace of at least 0.5ha within 200 metres, or
- A local natural greenspace of at least 2ha within 300 metres walk from home. AND
- A medium sized neighbourhood natural greenspace (10ha) within 1km. AND, beyond 15 minutes' walk:
  - A medium/large wider neighbourhood natural greenspace (20ha) within 2km. and
  - And large district natural greenspace (100ha) within 5-km. and
  - A very large subregional greenspace within (500 ha) within 10 km.

We note the GMLNRS acknowledges that “Access to green spaces in Greater Manchester does not currently meet national standards recommended by Natural England” (our emphasis) and highlights that:

- \* An estimated third of Greater Manchester's population do not live within 15 minutes of a decent sized green space (as set out in national standards.
- \* Only an estimated 40% of our population live close (within 200m) of a small greenspace (0.5ha or bigger).

The Natural England Green Infrastructure Standards also suggests that Local Authorities should set a target which aims:

“for x% of people to have access to good quality parks, green and blue spaces close to home for health and wellbeing, to meet the Accessible Greenspace Standards, with an initial focus on access to green and blue spaces within 15 minutes' walk from home by 2030, and y% by 2040 and 100% by date z.”

Whilst the GMLNRS does contain some headline targets it also highlights that the “Local Nature Recovery Strategy is not a delivery plan”<sup>7</sup> and that a delivery plan will be produced to sit alongside the strategy in 2025.

Manchester Friends of the Earth would like to see more details of:

- \* how the delivery plan will be developed;
- \* how specific targets will be identified and prioritised; and
- \* whether there will be a public consultation on the delivery plan.

### 3) Nature pollution hotspots and inequalities

The GMLNRS states that:

- \* Echoing national trends, people experiencing multiple inequalities in Greater Manchester tend to live in areas with less green space, compared to more affluent areas.
- \* Communities experiencing racial inequalities are nearly twice as likely to live in areas with the least green space.

Research published by Friends of the Earth in September 2024, highlights that over a quarter of neighbourhoods in England (27.5%) breach multiple pollution thresholds that are unsafe for wildlife.

The analysis identified "pollution hotspots" where water, air, noise and light pollution converge at levels that are threatening the future survival of a host of iconic British species, including pollinating bees and native bats.

Friends of the Earth plotted these nature pollution hotspots onto an interactive map. Chelsea and Fulham was identified as the constituency with the highest concentration of pollution hotspots, followed by Salford, Worsley and Eccles, Vauxhall and Camberwell, and Battersea.

This mapping of nature pollution hotspots serves to underline how England is one of the most nature-depleted countries in the world, with nearly one in six species facing extinction across the UK.

In the section on urban areas and inequalities the GMLNRS consultation asks respondents to indicate which social concerns are more important and/or should be prioritised.

We are exploring how we could improve our mapping of actions for urban areas, which of the following areas would you prioritise? - Areas with low green space and low income

- Areas with low green space and poor air quality

- Areas with low green space and poor health and wellbeing

- Areas with low green space and high flood risk
- Don't know.

Manchester Friends of Earth believes that it is very likely that areas of people on low incomes will also be areas with more than one of the above issues.

Friends of the Earth have developed a number of data sets that explore the environmental links to deprivation (links below).

'Near You' mapping.

Mapping English Tree cover.

Health harm from excessive heat (study with the University of Manchester).

Will the GMLNRS delivery plan make use of the Index of Multiple Deprivation and health inequalities data sets to map and set priorities?

#### 4) Priority species.

The consultation states (as does the main document) that:

“a long list of over 400 threatened species was identified. From this list, 16 priority species and species groups have been selected for action in this first iteration of the LNRS.” The GMLNRS also lists species to focus on in the first instance, namely:

#### Individual priority species

- Mountain hare
- Water vole
- Willow tit
- Black-necked grebe
- Hedgehog
- European hornet
- Black poplar
- Slow worm.

#### Priority species groups

- Upland bees, butterflies and moths (such as Bilberry bumblebee, Tormontil mining bee and Manchester treble-bar moth)

- Urban birds (such as Swift, House martin and Black redstart)
- Farmland birds: (such as Tree sparrow and Corn bunting)
- Grassland fungi: (such as Pink waxcap and Jubilee waxcap)
- Migratory fish: (such as Atlantic salmon and European eel)
- Grassland ground-nesting birds (such as Curlew and Lapwing)
- Brownfield insects (such as Dingy skipper and Common blue)
- Mossland insects: (such as Large Heath).<sup>17</sup>

We would query why more aquatic invertebrate species, such as mayflies, caddisflies and stoneflies, are not seen as priorities. We understand that these species are useful indicators for the condition of both river and fresh waters. The GMLNRS also states that “We hope that actions taken to help conserve these species mean that other species can be prioritised in future updates to this strategy”.<sup>18</sup>

We would argue that this is too vague and lacks urgency.

5) Lawton Principles, priorities and delivery.

The GMLNRS consultation asks: “Do you support the use of the Lawton Principles (as set out above) to identify Opportunity Areas for nature recovery?”

Manchester Friends of the Earth agrees that the use of the Lawton Principles is the right approach.

However, the consultation makes great use of ‘more’, bigger, ‘joined up’ etc and the GMLNRS also states that:

- \* Local authorities can use this strategy...
- \* Businesses can use this strategy...
- \* Planners and elected representatives can use this strategy...
- \* Developers should have regard for this strategy...<sup>19</sup> (our emphasis).

We note that the GMLNRS states that a “detailed overview of how this strategy can be used by different audiences will follow this strategy”

For example:

\* Governance around concreting over gardens and driveways adding to run off and localised flash flooding as well as removing nature corridors.

Since 2008 planning permission has been required if gardens are being paved over with impermeable materials (asphalt, concrete etc).<sup>21</sup> A brief survey of the Greater Manchester Local Authorities Planning Portals shows very few such planning applications for residential properties. Despite clear evidence that many properties have converted front/rear gardens for vehicle parking purposes using primarily concrete, paving slabs or tarmac.

\* Swift boxes - we welcome Bury Council approving a Council motion in July 2024 which approved a motion seeking the “mandatory conditioning of Swift Bricks into new developments in Bury.” <sup>22</sup>

\* Biodiversity net gain - for developments in Greater Manchester, the minimum level of Biodiversity Net Gain (BNG) is considered to be achieved when the biodiversity units for the habitats (for example, area based habitats, rivers and/or hedges) impacted by the development is increased by 10% or more after the development.<sup>23</sup>

Under the Environment Act, it's now mandatory for developers to implement BNG, the aim of which is to leave nature in a better state than before. This means that local planning authorities need to be well versed in how developers can meet the 10% improvement, which is the minimum statutory requirement.

However, there are concerns about whether 10% BNG really delivers gains for nature, and Kent County Council is going a step further by considering a 20% BNG benchmark.

In June 2022 the council commissioned a viability assessment to find out whether a 20% BNG policy was possible and reasonable. The assessment found:

\* An increase to 15% or even 20% wouldn't cause a significant impact on viability in the majority of cases.

\* The biggest cost for developers is reaching 10%, but any increase after that is far less and generally negligible.

\* The assumption that 20% BNG would mean double the land area and double the cost is a misconception. <sup>24</sup>

We look forward to the GMLNRS and action plan helping to embed best practice across the Greater Manchester Local Authorities.

## 6) Greater Manchester Nature Network map.

The Nature Network map<sup>25</sup> helpfully identifies areas the Core Local Nature sites and Nature Recovery Opportunity Areas. See example below for the Chat Moss areas.

The GMLNRS highlights a nature recovery success on “Chat Moss which spans Salford and Wigan, an area that was originally lowland raised bog (a rare and threatened habitat) has been degraded by agriculture and peat extraction. However, restoration efforts have seen nature recover in these areas, such as Astley and Bedford Mosses, Cadishead Moss and Little Woolden Moss. Species such as nightjar, the large heath butterfly and sundew (one of the UK’s few carnivorous plants) can now be found on the mosslands.”

However, Manchester Friends of the Earth would like to see the Nature Network map also include details of all the Site Allocations that have been permitted in Places for Everyone (P4E) so that we can better understand any possible impacts from housing or industrial developments. See for example the map from the JPA29 Port Salford Extension.

This allocation would result in the removal of 124.2 hectares of existing Green Belt. 108.6 hectares of this would be within the development allocation itself and a further 15.6 hectares as a result of the removal of land within the operational area of Barton Aerodrome and existing dwellings (and adjoining land) to the east of the allocation which would become detached from the wider Green Belt.

## 26.

I read the whole plan but the 'have your say' part didn't allow for comments on the draft per say.

A couple of things I'd like to say but couldn't.

your example of good practice of Rochdale planting annual wildflower verges is alarming as this involves disturbing the soil annually too. Annual wildflowers instead of bedding plants in flower beds would be much better. Leaving the verges to be long grass without disturbance with annual cutting is more in line with 'plant life' advise. The public needs educating that a messy verge is good, it doesn't have to be pretty.

Crompton moor tree planting is another one. its on predominantly heathland which had some birch encroachment. The holes dug are much larger than the trees require and have exposed large sods of peat.

For community involvement and engagement and 'forward planning' there needs to be better protection for the designated sites. Nothing is more heartbreaking for a community than the land they have tended for years being built on. So little of the land is being designated compared with how much has been sacrificed for the Strategic plan.

woodland- Tree planting does not create woodland unless it is next to ancient woodland. Its just a plantation. need to have a plan for ground cover particularly to discourage invasives once a field is planted up and the grassland species shaded out.

Farmland- area restored for nature especially for ground nesting birds should be in fields without footpaths as dogs will always be off lead, RSPB reserves are able to enforce but even wildlife trust sites are dog playgrounds.

Sundew might be a good upland moorland target species, as you need to have a good healthy bog to support it. Mountain hare is a poor choice as its not locally native and its doomed with less snow in the winter.

**27.**

## GREATER MANCHESTER DRAFT LOCAL NATURE RECOVERY STRATEGY

Thank you for consulting Historic England on the above document.

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

Historic England welcomes the preparation of the Greater Manchester draft Local Nature Recovery Strategy (LNRS). We would like to take this opportunity to offer you some general advice, firstly highlighting the important synergies between LNRS and the historic environment. We also offer some more specific advice in relation to the range of things we would expect to see included in the Strategy regarding the historic environment as well as the key issues for consideration concerning any proposed sites

Important synergies between LNRS and the historic environment

There are many synergies to be had between the historic and natural environments. Conservation and enhancement of the natural and historic environments can go hand in hand and are an important facet of sustainable development.

Countryside, landscaped parks and the open spaces in and around our cities, towns and villages often have heritage interest, and it would be helpful to highlight this in the Strategy. Nature recovery should be considered not only in terms of the natural environment, health and recreation but also how the historic environment can contribute to and work alongside these aims.

It is important to recognise that the historic environment, like the natural environment, is irreplaceable and includes designated assets that are protected by legislation. It can be helpful to understand the nature and significance of the historic environment within your plan area or scheme at an early stage so as to avoid any potential conflicts with its conservation.

Indeed, many sites designated and protected for their ecological importance also include, or coincide with, designated heritage assets (such as World Heritage Sites, Registered Parks and Gardens, Scheduled Monuments and Conservation Areas). At such sites, past human activity, specific design or functional considerations, and long periods of sustained and targeted management have led to a concentration of habitats and features supporting protected species.

Such sites often preserve ancient and veteran trees and cultivate both native and introduced specimens which serve as important natural resources for foraging opportunities and associated habitats, supporting impressive amounts of wildlife. Moats, canals, lakes and other defensive or ornamental water bodies as well as ditches, mill race and other modified watercourses provide a range of aquatic habitats. Long established woodland and grassland habitats support an array of plants, fungi and invertebrates associated with undisturbed soils and aid in carbon sequestration. Historic ornamental and functional structures provide shelter and breeding opportunities for protected species.

It may be useful for the Strategy to refer to the role that the natural environment can play in delivering positive, and often mutually beneficial, outcomes for the historic environment. It can help to:

1. Conserve and enhance heritage assets;

2. Improve the setting of heritage assets;
3. Improve access to heritage assets;
4. Create a sense of place and tangible link with local history; and,
5. Create linkages between heritage assets and local nature recovery sites.

Likewise, the historic environment can contribute towards the quality, character and distinctiveness of green spaces and the natural environment by helping to create a sense of place and a tangible link with local history and human activity

Opportunities can be taken to link new networks into already existing green spaces in towns or existing historic spaces, such as church yards, to improve the setting of historic buildings or historic townscape

Maintenance of the overall nature network and individual spaces should also be carefully considered so that it continues to aid nature recovery and create high quality places which thrive in the long term, whilst conserving heritage assets. Including heritage assets within your plan or scheme and seeking to manage them effectively and with policies and actions that are appropriate for the assets involved can, as already highlighted, deliver a host of additional benefits for society.

We recommend that the LNRS seeks to highlight these synergies and the ways in which the natural and historic environment can complement one another.

In developing the strategy, we recommend that you consider the following factors in relation to the historic environment: The Strategy should:

1. Acknowledge links between the nature network and heritage assets in the area and set an appropriate methodology for considering prospective nature recovery opportunity areas.
2. Consider the extent to which the historic environment will be affected, both positively and negatively, by habitat creation proposals.
3. Consider how, if at all, recent and ongoing Biodiversity Net Gain or similar projects considered the historic environment in developing habitat enhancing land management plans.
4. Determine whether there are any conflicts between the Strategy's proposals for nature recovery or enhancement and the historic environment? For example, proposals:

- a. within designated areas that would impact on the significance of a heritage asset or Outstanding Universal Value of a World Heritage Site, such as nature recovery or habitat creation that does not sufficiently take heritage impacts into account, including historic character and setting.
  - b. that include afforestation on 'open' landscapes, which could interrupt the relationships and inter-visibility between heritage assets.
  - c., that will alter the condition of soils or the water environment which could impact on below ground archaeology.
  - d. to change land management practices which could affect the character of historic landscapes.
5. Identify where there are opportunities for biodiversity enhancements that would benefit both the natural and historic environments. For example:
- a. restoring historic hedgerows
  - b. restoring priority habitats that support both nature recovery and historic character of particular landscapes e.g. wood pasture and parkland, traditional orchards, open water, meadows etc.
  - c. changes to land management practices that protect archaeological features, such as the reversion of arable land to meadow or pasture where appropriate.
  - d. measures that improve the water quality of historic lakes, ponds, and canals, or that restore historic water management features.
  - e. improving public access and interpretation of both natural and historic features
  - f. restoring historic structures or landscape features that could also support wildlife, e.g. icehouses, follies, ha-ha etc.

6. Set out how landowners and land managers can best look after known and unknown historic environment features and the wider historic landscape on BNG offsite settings

## Sites

We do not currently have capacity to review all sites proposed for nature recovery and enhancement within the Strategy. It is important that you consider whether new areas for habitat creation or restoration, or proposals for enhancements to existing nature

conservation sites, will affect the significance of heritage assets in the area either directly, or through changes to their setting.

#### Additional Guidance

The following document may provide some helpful guidance in relation to LNRS and the historic environment Nature recovery and the historic environment, Natural England, 2023

We trust that this information will be helpful to you as you prepare your Draft Strategy and identify Sites as part of the LNRS.

#### Specific comments on the draft Greater Manchester LNRS

We encourage the LNRS to identify opportunities where schemes can deliver benefits for both nature and heritage through an integrated approach. Newly created or altered habitats will often sit within a historical landscape and may have both positive and negative impacts on setting as well as the physical and chemical conditions of heritage assets.

Consequently, actions associated with habitat creation, restoration and management need to take account of the historic environment. This includes the potential for impacts on archaeological remains

Often such actions will be entirely appropriate; however, care will be needed in areas that impact on Scheduled Monuments. Shrub and tree growth is the principal threat to most monuments across the county; early engagement with Historic England is advised regarding any measures likely to impact a Scheduled Monument.

We welcome recognition that one of the benefits of the LNRS could be greater connection for people to our natural and historic environment (page 13). However, currently, little reference is made within the draft strategy to the relationship between the natural environment and heritage, or to the opportunities for realising mutual benefits. The Nature Recover Opportunity Areas identified in the draft LNRS coincide with a large number of designated heritage assets across Greater Manchester, including Scheduled Monuments, Registered Parks and Gardens Listed Buildings and Conservation Areas, and areas with the potential for archaeology.

We support the approach of identifying opportunity areas that are potentially suitable for carrying out different habitat actions (page 46). In developing proposals for any parcel of land, it will be important to consider all potential constraints and opportunities, including the

effect on the historic environment (both designated and non-designated heritage assets). We therefore welcome that the strategy highlights the need for all proposals to be taken through appropriate existing decision-making frameworks, consultation, permissions, permits or licenses, and to follow good practice around habitat creation, restoration or enhancement.

With regards to the section on the principles for habitat enhancement, restoration and creation (page 49) we support the priority of maximising multiple benefits. In certain circumstances, there may be opportunities for the enhancement of both the natural and historic environment, along with the health and wellbeing of communities, through appropriate interventions

Urban green spaces and buildings (page 50) – A number of the parks, gardens and green spaces of Greater Manchester are also important heritage assets or form part of the setting to heritage assets and make a positive contribution to their significance. Indeed, all of the three projects highlighted as recent examples of the greening of disused spaces in this section of the strategy have a link to heritage. Castlefield Railway Viaduct in Manchester is a Grade II Listed structure within a conservation area, whilst Elizabeth Park in Bolton and Jubilee Park in Oldham are both adjacent to conservation areas and have helped to improve the setting of these and other heritage assets, the same can be said for Stockport's Viaduct Park.

Any project that would involve, or potentially affect, heritage assets should conserve or enhance the historic environment in line with national and local policies. They also offer the opportunity for the integrated management of the historic and natural environment.<sup>1</sup> We suggest that this link between heritage and nature is recognised in the LNRS and added to the list of wider benefits on page 51.

Woodlands, trees, scrub and hedgerows (page 55) – Tree planting close to Scheduled Monuments is not recommended by Historic England or under the UK Forestry Standard, due to the potential to damage to the significance of monuments. The UK Forestry Standard gives a Buffer of 20m as an example, but actual buffer zones should be agreed with Historic England.

Creating new hedgerows needs to be informed by an understanding of historic landscape character and the potential for archaeological remains. There is the potential to reinforce local landscape character, as described in the National Character Area profiles.

Boundaries, including hedgerows, walls and ditches form an important part of the historic landscape and their maintenance, in no small measures, is reliant on heritage skills.

Rivers, canals and waterbodies (page 59) and lowland mosslands and wetlands (page 62) – These priority habitats have a particular resonance regarding the conservation of water dependent archaeological remains. We highlight that some of the works required to control, maintain or reinstate water levels have the potential cause harm to archaeological remains. This should be discussed with the relevant local planning authority's archaeological advisers, unless the remains are scheduled (in which case, early engagement with Historic England is advised).

The strategy provides an opportunity to interweave the connections between river systems and the historic environment, such as the landscape design responses of the numerous conservation areas, parks and gardens along Greater Manchester's waterways, the industrial heritage associated with the canal system (such as the Bridgewater Canal Conservation Area in Leigh), and designed water features (such as those at the Grade II Heaton Park Registered Park and Garden). We encourage the LNRS to take account of any impacts of river management changes on the significance of such assets and features. We encourage the LNRS to take account of any impacts of water management changes on the condition and significance of heritage assets.

Upland moorlands (page 66) – It is important to safeguard the rich legacy of historic buildings, settlements and landscapes of the upland areas, particularly its moorland heritage. The upland areas of Greater Manchester have been shaped by human activity, farming and industry since pre-historic times and contain a wealth of designated and non-designated heritage.

As a general point, we recommend liaison with the GMCAs archaeological and conservation advisers regarding data on historic landscape character and information relating to designated and non-designated heritage assets before the LNRS is finalised.

Finally, we should like to stress that this opinion is based on the information provided by you as part of your consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.

## 28.

On behalf of my client, Peel Waters, I am pleased to provide comments on the Greater Manchester Local Nature Recovery Strategy (GMLNRS) consultation.

Peel Waters is part of the Peel Group of companies and is behind some of Greater Manchester's largest and most transformative development proposals. These projects will play a central role in realising a sustainable, prosperous and equitable future for Greater Manchester and, to that end, benefit from strategic level policy support through both the recently adopted Places for Everyone (PfE) joint development plan as well as Local Plans.

As relevant to these representations, these include:

- Manchester Waters (Pomona Island): a new mixed-use waterside neighbourhood at the western gateway to the City Centre, able to accommodate over 3,000 new homes and subject to a masterplan developed collaboratively between Peel Waters and Trafford Council.

Manchester Waters is subject to a 'Broad Location' designation in the adopted Trafford Core Strategy which allocates the land for a range of residential and commercial development. The site forms part of Trafford Council's identified pipeline supply of housing land, which has informed the development of PfE. Peel has to date delivered over 600 homes at Manchester Waters and is preparing a planning application for the residual land within the area, capable of accommodating over 2,600 further homes. A site location plan is provided at Appendix 1.

- Port Salford: a multi-modal freight and distribution hub located within Salford and on its boundary with Trafford. Port Salford Phase 1 benefits from planning permission for c150,000 sq m of rail and water served logistics space with Phase 2 being allocated for development through PfE via Policy JPA26. Phase 1 and Phase 2 of Port Salford are subject to allocation for development through Policy JP-STRAT4 of PfE.

In relation to Port Salford, paragraph 4.34 of PfE sets out that

Port Salford is currently under construction and will be the UK's first tri-modal inland waterway port. It is located on the Manchester Ship Canal, which is a unique 36-mile long seaway extending from the heart of Greater Manchester westwards to the Mersey Estuary, however, this location offers significant opportunity for further economic growth. Supported

by sustainable transport it will ensure the economic growth at this location is accessible to a wide range of residents and will reduce levels of poverty in Greater Manchester, particularly in the surrounding “inner areas”.

Paragraph 4.37 goes on to explain that:

The tri-modal facilities at Port Salford have the potential to deliver major benefits for Greater Manchester, not only supporting a larger and more sustainable logistics sector but also enabling the more efficient and cost effective movement of components and products for manufacturers.

Both Manchester Waters and Port Salford lie within Greater Manchester’s Core Growth Area as defined by PfE, establishing these locations as priorities for development in realising the ambition of PfE. This reflects their sustainable location and the specific (and strategic level) benefits which can be derived from their development.

Paragraph 4.24 of PfE describes the Core Growth Area as a ‘...huge agglomeration of economic activity at the centre of Greater Manchester...’ and ‘...the city region’s greatest strength.

In establishing it as the priority location for new development, of the Core Growth Area paragraph 4.25 notes that:

It provides the greatest growth potential and best opportunity to increase the international competitiveness of the city region. It offers a significant opportunity to create jobs for existing local communities, particularly those from the more deprived communities, thereby reducing poverty and delivering inclusive growth. Despite the challenges currently facing the nation as a result of the health crisis resulting from the Coronavirus pandemic, delivering high levels of employment growth in this area will be crucial to maximising the accessibility of jobs to residents across Greater Manchester in a sustainable way. This continuing agglomeration of activity will provide the scale, quality and profile of activity necessary for Greater Manchester to become a top global city.

Whilst paragraph 4.26 states: T

here is also an opportunity to continue to grow significantly the residential role of this core area, including a broader range of dwelling types and an increase in the supply of affordable housing. Securing large numbers of new homes in this part of the sub-region will

enable more people to live near to a variety of employment, business and leisure opportunities, and reduce pressure on greenfield and Green Belt land elsewhere in Greater Manchester.

Set against this backdrop, we would highlight that there is a need to ensure that the implementation of the GMLNRS is cognizant of and balanced against the delivery of PfE and the City Region's ambitions for growth as expressed within it.

This is a particularly relevant consideration in the context of sites which have a strategic role in delivering PfE, including allocated sites and locations within the Core Growth area, without which, by definition, the ambitions of PfE would not be achieved.

Such sites and locations have an elevated role and status in delivering PfE in this regard, with the benefits derived from their development being of greater magnitude. This must be given commensurate weight in considering any development proposals against potential aspirations for interventions which enable such sites to contribute to nature recovery.

Specific comments on the Nature Recovery Plan

Status of the plan, interaction with planning policy and the role of development.

Parts of both Manchester Waters and Port Salford are identified as 'Opportunity Areas' within the Draft GMLNRS. In both cases they are identified as a 'River, Canal and Waterbody Opportunity' and, in the case of Port Salford, also as a Woodland, Trees, Scrub and Hedgerow Opportunity; a Grassland, Farmland and Lowland Heath Opportunity; and a Lowland, Wetland and Mossland Opportunity. In respect of both, potential measures to realise the site's nature recovery potential are identified.

Overall, Peel Waters is supportive of the ambition and purpose of the Draft GMLNRS.

Further it welcomes an acknowledgement within the Draft GMLNRS that the identification of Opportunity Sites is not intended to be 'a barrier to development' and indeed that development provides a means of delivering the ambitions of the GMLNRS (see page 43).

This intent to clarify the status of the Plan and indeed the implication of the identification of a site as an Opportunity Area is welcomed. However, given the absolutely central role that development will play in realising the nature recovery potential of Opportunity Areas (the absence of alternative means of achieving these ends), additional explanation of how the

GMLNRS interacts with planning policy and would inform decision making would assist in removing ambiguity in this regard.

To this end, we consider there to be a need for the GMLNRS to clarify, for the avoidance of doubt, that:

- a) The identification of an Opportunity Area does not change or add to the development plan status of any sites in the context of Section 38(6) of the Planning and Compulsory Purchase Act 2004 which establishes the primacy of the development plan in decision making.
- b) The identification of an Opportunity Area does not itself have a direct influence on the question of a site's suitability for development in principle
- c) Where the nature recovery opportunity presented by a site cannot be realised in the context of development coming forward, this should not itself be determinative as to the acceptability of the development reflecting that the GMLNRS is not part of or supplementary to the development plan
- d) Where development within an Opportunity Area is able to make a positive contribution to nature recovery in accordance with the GMLNRS, this should be given positive weight in the planning balance over and above any wider biodiversity gain out with the ambitions of the GMLNRS.

Added to the above, the GMLNRS should clarify that, in most cases, and in the absence of any ability to achieve this via other means, development will provide the principal vehicle for delivering the GMLNRS and, to this end, the GMLNRS is fundamentally reliant on implementation of PfE and Local Plans which flow from this. This goes beyond simply acknowledging that the GMLNRS is not a barrier to development.

These additions are necessary to provide all stakeholders and users of the GMLNRS with clarity over its use, status, influence on decision making and interaction with planning policy.

We would also note that in respect of sites which benefit from planning permission, the delivery of development in accordance with such permissions should not be bound by any requirement to have regard to the GMLNRS to the extent that such permissions, approved

before the strategy comes into force, may not deliver the ambitions of the strategy in relation to specific sites.

DEFRA Biodiversity Metric: strategic significance.

It is noted that at page 46, the GMLNRS states that:

Areas mapped for action within the Nature Network, including both the opportunity areas and the core local nature sites, are particularly suitable for the delivery of offsite biodiversity net gain and are classed as strategically significant in terms of the Defra Biodiversity Metric.

Peel Waters does not agree with this position, or at least considers this to be open to the incorrect interpretation.

Guidance on attributing 'strategic significance' is provided in the Statutory Biodiversity Metric User Guide (July 2024) published by the Department for Environment, Food and Rural Affairs.<sup>1</sup> This identifies three levels of strategic significance for the purposes of undertaking BNG assessments – namely low, medium and high. There is no standard 'strategically significant' status as implied at page 46 of the GMLNRS rather every site has a grading of strategic significance.

This grading is relevant to any consideration of change in strategic significance, facilitated by an intervention on site (including via development) and has a bearing on how BNG is approached. Table 7 of the User Guide outlines the approach to be taken.

This sets out that where, in the case of a LNRS being in place, a site (i.e. an Opportunity Site) that is subject to a potential measure proposed to help deliver the priorities of that LNRS and the intervention is consistent with the measure proposed for that location, then the 'Strategic Significance' of the site should be recorded as 'high' in the post development/intervention scenario and 'low' in the baseline; the latter irrespective of the site's condition and features.

A BNG multiplier of 1.15 is to be applied to the specific measures taken in line with those proposed in the LNRS in such cases. The multiplier is intended to incentivise developers to direct their BNG interventions towards measures sought by the LNRS.

As such, strategic significance is a relevant consideration in the post-intervention scenario only with, prior to any such intervention, Opportunity Sites having no greater strategic

significance than any other site, contrary to what the paragraph at page 46 of the GMLNRS indicates.

In this context, it is considered that the aforementioned paragraph on page 46 is erroneous and misleading. This should be removed from the GMLNRS.

#### Engagement with landowners

We would note that there has to date been no direct effort to engage with Peel Waters regarding the GMLNRS. The Local Nature Recovery Strategy Statutory Guidance (March 2023) published by the Department for Environment, Food and Rural Affairs promotes effective engagement and collaboration with landowners in preparing strategies (see paras 88-90 specifically)<sup>2</sup> particularly given the onus on landowners to facilitate the interventions needed to deliver the strategy in the context of there being no commercial return for doing so.

To that end, Peel Waters would welcome the opportunity to engage with the GMCA regarding the site specific opportunities to contribute to delivery of the GMLNRS.

I trust these comments are of assistance in considering the further development of the GMLNRS and will be taken into consideration as they progress.

#### **29.**

##### Greater Manchester: Draft Local Nature Recovery Strategy

Thank you for consulting on the Draft Local Nature Recovery Strategy for Greater Manchester. The following response is provided REDACTED on behalf of the Home Builders Federation (HBF).

The Home Builders Federation (HBF) is the representative body of the home building industry in England and Wales. The HBF's member firms account for some 80% of all new homes built in England and Wales in any one year, and include companies of all sizes, ranging from multi-national, household names through regionally based businesses to small local companies. Private sector housebuilders are also significant providers of affordable homes, building 50% of all affordable homes built in the last five years, including all homes for social rent.

What is a Local Nature Recovery Strategy? (page 6)

The draft states that the purpose of the Local Nature Recovery Strategy (LNRS) will be to identify the most effective actions and best locations for nature recovery. We hope that the GMCA will give some thought to the spatial implications of this. It will be helpful if the LNRS could integrate with local plan preparation to support housing delivery as well as secure nature recovery.

There would be many advantages associated with the production of the LNRS, especially if it could help housebuilders meet their obligations for biodiversity net gain (BNG) where this cannot be implemented entirely on site. Identifying locations where payments might be made to secure nature recovery would be very helpful.

Who has been involved? (page 9)

We note that the Greater Manchester Combined authority (GMCA) has, among others, engaged with social housing providers and urban regeneration experts. In view of the potential importance of the strategy and its implications for housing delivery, we hope that the GMCA will engage also with housebuilders to ensure that its strategy is effective. HBF would welcome the opportunity to meet with the GMCA to discuss its draft strategy.

Targets (page 38)

The draft plan includes an aim to increase the volume of land designated for nature from 11 to 15 percent of the city region by 2035.

It would be helpful if the strategy would allow those areas providing biodiversity net gain (BNG) to be included as contributing to meeting this target. Some residential development sites will have set aside quite large areas for BNG. This could also be true in terms of the aim to create 1,800ha of wildlife rich land.

It should be an aim of the LNRS to allow residential development to be integrated with nature recovery and to support this, by harnessing the benefits of BNG in the strategy.

A Spatial strategy for nature recovery (page 40)

On page 41 the GMCA observes that local nature sites cover 11 per cent of Greater Manchester but these are fragmented and poorly connected. The aim is to improve their condition and connect them better. Allowing housebuilders to discharge their legal obligation for BNG by contributing to the improvement of these would be very helpful, as well as a positive move to support housebuilding across Greater Manchester.

Allowing residential schemes to contribute to the improvement and recovery of local nature sites wholly or in part, as a means of meeting BNG, irrespective of where the scheme is located within the ten constituent local authorities, would be very helpful. E.g. a scheme in Rochdale could contribute to a fund for the recovery and enhancement of local nature sites across the whole of Greater Manchester, as a means of discharging the BNG legal duty.

#### Nature Recovery Opportunity Areas (page 43)

Page 44 identifies Nature Recovery Opportunity Areas (NROA) across Greater Manchester. Page 43 states that development within these areas, or where it might have an impact (this would need to be defined) should support and deliver the priorities expressed for these areas.

As we have argued above, if payments could be made by housebuilders to enable them to discharge their legal duty under BNG by contributing to the improvement of the Nature Recovery Opportunity Areas, this would be a very helpful step.

There would be viability implications associated with any actions required by housebuilders to contribute to the enhancement of NROA if these actions go further than BNG. While the cost of actions associated with discharging BNG has (or will be) reflected in the viability assessments supporting local plans, this may not be the case with the proposal in this section. The GMCA will need to consider carefully the implications of this proposal on the viability of residential development, especially if this action is intended to be additional to BNG. It would be much better if actions and payments could be counted as contributing to BNG.

If this is to become a planning requirement, the GMCA will need to define 'where development might have an impact'. Preferably, this should not be a matter of judgement for the local authority, as housebuilders need to understand the costs associated with development. It would be much better if residential developments outside of these NROA are not subject to contributions, recognising that all residential development must contribute to BNG anyway.

#### Taking action within the Nature Network (page 46)

It will be necessary for the GMCA to clarify how contributions for enhancement, creation and restoration will be dealt with through the development management process, if it is proposing something that will be additional to BNG.

## Priorities and actions: what do we need to do? (page 48)

There will need to be a discussion with the development community (and not solely registered providers or urban regeneration practitioners) about how the aims in this section will be translated into feasible and implementable planning policies. For example, the actions listed on page 53 could have implications for viability, and would likely need to be introduced via the local plan process. Implementation through the local plan process is necessary to ensure that the effect of these actions on the delivery of other public policy goals is considered carefully.

Some of the actions listed may already be features of local plan policy and some reflect the direction of travel in the NPPF (for example BNG and sustainable urban drainage systems – SUDS). Others might represent new requirements, and they might compete with the ambitions of the Mayor in terms of public transport and affordable housing. Although the Environment Act 2021 requires local planning authorities and decision-makers to have regard to the Local Nature Recovery Strategy in their policies, it will be necessary for the GMCA to recognise that there could be competing priorities in the short term in terms of what is required by the policies in the statutory development plan and what might be required under the LNRS. To avoid planning deadlock, it will be necessary to ensure that policies in the LNRS are reasonable and can be applied flexibly. This will be necessary at least until the aims of the LNRS can be formally embedded in the new local plans produced by the ten GM local authorities.

## How you can deliver the strategy (page 77)

The draft plan is unclear currently how the priorities identified will be delivered. The document identifies several groups who can make contributions. On page 77 it lists:

Those who own or manage land.

Those who are involved in developing land for new homes or commercial spaces.

Those who run or manage businesses or other organisations.

Those who are involved in community-led groups and action.

Those of us who live and/or work in Greater Manchester.

If it is expected that residential development will finance or provide as a condition, or planning obligation, all the priorities identified, then the strategy is likely to fail. It would be

unfair to saddle housebuilding with delivering all these objectives. Housebuilders will already be making a significant contribution to nature recovery through BNG, plus other adopted local plan policy initiatives, and potentially other nature recovery measures (like recreational impact zones designated by Natural England). If responsibility for financing all these measures is expected to be provided by housebuilders this will have a seriously detrimental effect on the delivery of homes. The viability assessment that underpinned the Places for Everyone Joint Plan concluded that most residential development in the inner wards of the Greater Manchester area was unviable. The situation will not improve with the additional costs associated with the LNRS added. The consequence will be less of some other policy objective, if the aims of the LNRS will have first claim. This needs to be recognised.

Harnessing the BNG mechanism by allowing housebuilders to discharge their obligation offsite by contribution to a nature restoration fund would seem to be the most sensible and effective approach. This is a mandatory cost, and it will have implications for the attainment of other planning policy goals, but at least there is an established mechanism for measuring and delivering BNG.

### **30.**

Re: The Greater Manchester Local Nature Recovery Strategy Consultation –  
Representations on behalf of AB World Foods and Associated British Foods

We act on behalf of AB Worlds Foods ('ABWF') and its parent company, Associated British Foods ('ABF') and have been instructed to submit representations to the above consultation.

ABWF is a food manufacturer and a major employer, operating from an established factory located in Kiribati Way, Leigh (within the administrative area of Wigan Borough Council). ABWF's ownership as identified on the attached site location plan (ref: 19-02253\_SLP01) includes the current operational area as well as an area to the north of the existing factory, which is earmarked for the future expansion of the business.

A small area within the southern boundary of ABWF's operational area and the majority of the area to the north of the current operational area in ABWF's ownership are identified as River, Canal and Waterbody Nature Recovery Opportunity Areas.

The draft Nature Recovery Strategy explains that Opportunity Areas do not provide any additional designation or protection of land but is identified to create or improve habitats as part of the Nature Network. It also explains that Nature Recovery Opportunity Areas are where action to enhance, restore or create different types of habitats would expand and better connect Core Local Nature Sites.

In the context of the purpose and objective of the identification of Opportunity Areas, we object to the inclusion of all areas within ABWF's ownership in the Opportunity Area. The small area within the operational area is maintained, managed and required by the business for the purpose of ongoing operations and health and safety. The area to the north of the current operational area is maintained, and safeguarded for the future expansion of the business. As such, the areas within ABWF's ownership are not available or appropriate for habitat management or enhancement as part of the Nature Network. With regard to the enhancement of habitats, the statutory biodiversity net gain will be considered as part of the future development. As such, it is not appropriate for the area to be identified as part of the Nature Recovery Opportunity Area.

To conclude, in response to Q32 and Q34, it is requested that the areas within ABWF's ownership are removed from the Nature Recovery Strategy and the Nature Recovery Opportunity Areas Map.

### **31.**

I have just submitted some brief feedback on behalf of RPSB using the online public consultation questionnaire but I wanted to add some further comments regarding some of the habitat and species actions that the form didn't really present an appropriate place for. Comments as follows:

- Blanket bog and wet heath – In several parts of the plan the wording “Stabilise, rewet and restore deep bare peat towards active blanket bog, where appropriate.” is used. We agree that peatlands should be restored and rewetted, however that should not apply only to “bare” areas but also to areas that are degraded/species poor or have not currently got functioning hydrology. Bare peat is a much smaller problem than it was a decade or two ago due to an enormous amount of work to revegetate formerly bare areas but peatlands that are no longer bare are still in a non-active state and require further restoration efforts to ensure they become active and carbon sequestering. We would suggest removing the word bare where it has been used so that the plan actually

advocates for all deep and shallow peat areas to be restored. Where there is peat, restoration is always appropriate.

- Upland moorlands – While this section does state “Encourage a reduction in the intensity of upland grazing”, the choice of grazing animals is also important. Our upland habitats would benefit from a vast reduction in sheep numbers, with grazing instead being carried out by low numbers of native breed cattle. Instead of reducing botanical diversity as sheep do, native cattle can have the opposite effect, giving finer, flowering plants the opportunity to establish, as well as trees and shrubs. We encourage the LNRS to mention the importance of this change in grazing to achieve the plan’s ambitions.
- Deer management is also not mentioned, but this may be a vital action to allow the scrubbier and woodier habitats to establish in our uplands where deer pressure could prevent tree growth and regeneration.
- In the list of species that will benefit from upland moorland actions, heather is listed. Currently much of the uplands have an over-abundance of heather due to past management such as draining and burning. More diverse upland vegetation should be the ambition for this plan and heather may actually decline in some areas where it currently forms a monoculture due to poor hydrology. We suggest the removal of heather as a species to benefit from the upland actions. Cross-leaved Heath, a species that should be more abundant in our upland bogs and wet heaths would be a more appropriate plant species to suggest as a beneficiary of the proposed actions
- Mountain hare – The action “Protection from predators and livestock using fencing or other exclusion methods” is neither realistic nor feasible for Mountain Hares. We suggest that this action should be removed from the plan. It is not clear to us how areas could be fenced for Mountain Hares to protect them from predators and we are not aware of any evidence that predation is a limiting factor on Mountain Hare populations within the GMCA area (or elsewhere in the English population’s distribution.) The other actions for this species are positive.
- Hedgehog – There is no mention of reduction in the use of pesticides in relation to Hedgehogs. Insecticides/slug pellets etc. that are available to householders for garden use present a threat to the food of Hedgehogs and a reduction in the use of these products should be a key action to assist Hedgehog populations.

- Upland Bees, butterflies and moths – Many of these species do not rely entirely on upland moorland and heath so we would advocate for more vegetation diversity and flowering plants to be encouraged beyond “moorlands and heath” as currently stated in the plan. Using the Bilberry Bumblebee as an example, this species is heavily reliant upon species rich grasslands adjacent to upland moorland.
- Grassland ground nesting birds – This species grouping incorporates birds that have a very diverse set of habitat nesting requirements between them. They are not all grassland species and some of the interventions proposed are only relevant to one or two of the species listed. Dunlin and Golden Plover are ground nesting birds of upland heath and bog rather than grassland and so the actions proposed to support them would differ from the actions to support Lapwing for example. Some of the generic actions for ground-nesting birds such as reducing disturbance will apply to them all but the detail of what that entails will be different for different species. The habitat interventions proposed are not applicable to the whole group.
- We suggest the species groupings are revised and actions more specific to each species are proposed, e.g. restoring/rewetting blanket bogs for Dunlin and Golden Plover, rewetting grassland for Snipe/Lapwing/Curlew, ensuring no grazing in breeding areas of grassland for Curlew/Lapwing/Snipe during the nesting season, cattle grazing instead of sheep in breeding areas of grassland for Curlew/Lapwing/Snipe etc..
- Unfortunately Twite numbers have reduced to incredibly low levels in the South Pennines in recent years and the reality is that they might have already been lost from the GMCA area meaning efforts to protect existing populations are unachievable.
- Wildfire – There are multiple references to wildfire in the species actions and we welcome the fact that “natural firebreaks” are advocated. We would also suggest reference to rewetting and restoring hydrology as a means to reduce the risk of wildfire be incorporated into these actions
- Reintroductions – There is reference to public support for reintroductions of “birds of prey such as the red kite or hen harrier”. Red Kites have spread significantly since their reintroductions elsewhere so further reintroductions of this species are unlikely to be supported.
- The RSPB does not support Hen Harrier reintroduction plans as illegal killing is the main factor behind the continued low numbers of Hen Harriers in England and this must be stopped or reduced to a level that allows populations to increase as the immediate

priority. The RSPB considers that if illegal killing was removed or drastically reduced, Hen Harriers would be able to spread back to their former range.

I hope these points are helpful and I'm happy to discuss them further if that would be of use so please do get in touch if you have any questions.

### **32.**

The Friends of Birchfields Park welcome and broadly support the Local Nature Recovery strategy paper.

We are concerned with increasing biodiversity in the park, and maintaining it as a green space for the local community. We already have a Forest Garden, and have plans to create a hedge bordering the Woodland Walk, and we are rewilding the Woodland Walk. When available new trees are planted according to the original plan for Birchfields.

In the Delivery Plan we would like to see direct means of communication between GMCA and Friends of Parks groups such as ourselves, in order to support and help to implement the Local Nature Recovery Strategy for Greater Manchester.

### **33.**

We have submitted, as a community-owned company managing land for nature, our response to the consultation.

We have a working Woodland Management Plan. We feel that our land (3 ha) should possibly be classified as a Core Local Nature Site as we have made so much progress with it. (My reading of the map is that we are designated as an opportunity area. ). This change would make us equivalent to Ernocroft Woods and Etherow Park, both of which are adjacent to our land, so that we form an important corridor linking those larger sites to Brabyn's Park and the lower gorge of the Goyt towards Stockport. In any case, our section of the Goyt river bank is already classified a SBI and we have managed it with that in mind. We did, for example, undertake thinning of some oak woodland adjacent to the SBI and have cleared the river bank of invasive species - Himalayan Balsam.

For further information, please contact us.

(Core Local Nature Sites: These are areas already known to be important for nature, as they are designated or protected in some way (such as Local Wildlife Sites, Local Nature Reserves and irreplaceable habitats). )

REDACTED , representing the company board.

#### **34.**

The NFU represents over 45,000 farming and growing businesses across England and Wales. The NFU has collaborated with Responsible Authorities (RAs) across the country developing the Local Nature Recovery Strategies (LNRS), being in the unique position of communicating with all RAs to help encourage a consistent message for what the LNRS should look like, ensuring involvement from farmers and landowners.

NFU representatives have been part of discussions with Greater Manchester Combined Authority on developing the Greater Manchester LNRS and have fed in throughout the process. The NFU consultation response is an overview of our key considerations for the LNRS. We have encouraged our members to have their say on more specific aspects of the LNRS.

#### **Farmer and Landowner Engagement in the LNRS**

It is still unclear exactly what impact a LNRS could have on the planning process or how LNRS could influence ELMs, however there could be implications, and we know that the LNRS will influence BNG. Due to this and the vital role that farmers play in delivering for nature, the NFU has highlighted the need for all RAs to ensure that farming representatives, farmers, and landowners have had the opportunity to engage in the development of these strategies to ensure they work for farm businesses including their own ambitions for nature.

Our ask from RAs has been that farmers and landowners are given adequate time and opportunity to engage with the strategy at various levels and stages throughout its development and delivery. It is up to the individual farmer or landowner how or if they engage. The NFU has worked with Greater Manchester Combined Authority to give farmers the opportunity to feed into the process and promoted the public consultation. We do however feel that more farmer engagement opportunities in Greater Manchester could have happened prior to the public consultation to help ensure the strategy accurately represents what is happening on the ground and what could be achieved alongside farm businesses and food production. Particularly in respect to the practical actions of the LNRS as these will directly affect farm businesses in the Greater Manchester locality.

Key consideration for Local Nature Recovery Strategies:

It is vital that Greater Manchester Combined Authority and the subsequent LNRS recognise agriculture as a keystone activity in the countryside. Farms produce food, fibre and energy whilst also caring for the environment. These businesses will be at the forefront of delivering the strategies. The LNRS should therefore not prevent or add cost to farms trying to diversify, modernise and develop infrastructure, create unintended consequences on farm operations or act as a barrier to funding (private and public). Consideration should be given when determining 'practical actions', as in an agricultural setting the actions are likely to first hand affect the farm business and landscape. An example of this would be, for the proposed practical action "Encourage a reduction in the intensity of upland grazing and less intensive management of uplands" for the Upland Moorland habitats. Whilst over grazing can be problematic, these particular landscapes are complex systems, and a full impact assessment of reducing stocking numbers should be undertaken before any practical actions are introduced.

The NFU has identified the below key considerations for Responsible Authorities developing the LNRS:

- Recognition of farm contributions to nature. The LNRS must recognise the environmental contributions and improvements that farmers have already made, as well as any planned future contributions e.g. Environmental Land Management (ELMs), off-site Biodiversity Net Gain (BNG) etc. Farms will have their own priorities for nature, with consent this should be recognised in the LNRS.
- Recognition of the importance of domestic food production. We live in an increasingly volatile world, both politically and climatically. These can have a huge influence on our domestic food security and the ability to source produce. We saw the global food price increase by just over 70% between April 2020 and April 2022 as a result climatic events and the Russian invasion of Ukraine. UK food self-sufficiency is currently at 62%, but there are huge differences depending on the sector. For instance, we are over 100% self-sufficient in milk but 16% self-sufficient in fruit and 53% self-sufficient in vegetables. This is a function of the land we have and what it can grow. So, the ambitions of the LNRS need to consider the impact on domestic food security. We need to be mindful in that by trying to make space for nature we do not simply export our climate and environment footprint to other countries where environmental standards are lower, and their carbon footprint is higher. It can also be problematic socially as we may be importing food from places where it is needed.

- Sound scientific data. Data used to inform the LNRS must be from sound scientific sources. Data about agri-environment schemes such as Countryside Stewardship is available on Magic Maps and could be used in the LNRS if agreed by the landowner/farmer. Farm level data should be considered where relevant. Additionally, sound scientific data should remain unbiased and should be considered when looking to implement practical management decisions, such as considering stocking rates etc.
- Landowner choice and flexibility. Landowners and farmers need to be consulted with and given the opportunity to check their land data and choose how or if their land is mapped in the LNRS. Please do consider the consultation feedback you have received from the farming industry and if further consultation may be required. Farm businesses evolve and change, the LNRS must be flexible and include a mechanism which enables landowners and farmers to remove, add or change their mapped land or data at any time including once published. The LNRS also needs to recognise the economics of current land use may impact on the how deliverable an ambition is. It is critical that the LNRS does not impact on the choices individual landowners have on how they manage their land.
- LNRS impact on farm planning decisions. Farms need to diversify, modernise, and develop farm infrastructure to remain economically and environmentally sustainable businesses. The LNRS and associated local plans have potential to impact on a farm planning decision and how many BNG units a farm development might need to create. This could prevent or add costs to these developments. The LNRS mapping should as standard exclude any planned developments and areas surrounding farm infrastructure to ensure the developments are not hindered.
- Access to funding. Many farms will already be involved or will be planning to enter into ELMs or private markets agreements. The LNRS should not prevent farmers accessing this funding or any associated benefits. This is especially important for landowners delivering off-site BNG, as the LNRS could affect how any subsequent BNG units are calculated in the biodiversity metric. As above the LNRS must be flexible and include a mechanism which enables landowners and farmers to remove, add or change their mapped land or data at any time including once published.
- Joined up LNRS across farmland. Farm businesses cross over LNRS areas, it is vital that neighbouring strategies work together to ensure consistency across boundaries especially in the mapping

- **Mapping.** Throughout the development of the LNRS across the country, the NFU has stressed the importance of the Best and Most Versatile agricultural land being mapped appropriately. We ask that Greater Manchester Combined Authority have ensured that the more productive land suitable for food production (Grade 1, 2) is not considered priority areas for nature. It is also important that any maps which are produced are easily accessible to farmers and user friendly and granular enough so individual farmers are able to look at the what has been mapped on an individual field.
- **Species Priorities.** The list of priority species created as part of the LNRS should align with the government's national species target and ambitions. Species reintroductions have not been a priority for government, some of which could impact on the countryside, food production and farm businesses. Actions to support certain species must be carefully considered to avoid causing unintended consequences on farm businesses and food production. If wildlife crossings e.g. green bridges, are being considered in the LNRS, it is important to be aware of the potential risks created by these structures, such as the spread of animal diseases and to consult with landowners about their potential location
- **Delivery for nature and food.** Many see nature recovery and food production as a binary choice and mutually exclusive. This is not the case and there are many examples where making space for nature can be beneficial to food production. There are also examples where investment in increasing the efficiency of agriculture (such as improved water management) can benefit the nature environment and wildlife. These opportunities are like to be the most attractive to farmers and landowners and as a principle should be the priority targets for the LNRS.

**35.**

The Greater Manchester Local Nature Recovery Strategy Consultation – Representations on behalf of Allied Mills

We act on behalf of Allied Mills, a trading division of ABF Grain Products Limited, an operational flour mill and grain store at Coronet Mill, 1 Coronet Way, Salford, and have been instructed to submit representations to the above consultation.

The extent of the client's ownership and operation of Coronet Mill is identified on the attached site location plan (ref: 19-02253\_SLP02a). Coronet Mill is an operational flour mill

and is therefore the site is maintained and managed by the business to ensure ongoing operations and health and safety.

Parts of the operational area of Coronet Mill are identified as River, Canal and Waterbody Nature Recovery Opportunity Areas. The draft Nature Recovery Strategy explains that Opportunity Areas do not provide any additional designation or protection of land but is identified to create or improve habitats as part of the Nature Network. It also explains that Nature Recovery Opportunity Areas are where action to enhance, restore or create different types of habitats would expand and better connect Core Local Nature Sites.

It should be noted that all areas within Allied Mills' ownership are operational and are maintained, managed and required by the business for the purpose of ongoing operations and health and safety. As such, the areas within Coronet Mill are not available or appropriate for habitat management or enhancement as part of the Nature Network.

The areas within Coronet Mill do not offer opportunities for habitat management and enhancement as part of the Nature Network. Therefore, in response to Q32 and Q34, it is requested that these areas are removed from the Nature Recovery Strategy and the Nature Recovery Opportunity Areas Map.

### **36.**

As the REDACTED Friends of Longford Park (FOLP), I write to express our grave concern that though the Park is included in the proposed network, the same is not true of the adjacent Ryebank Fields site. This site definitely needs to be included - not least as it would complement and enhance the biodiversity opportunities for the Park which Trafford Council set out in its Activity Plan for its successful Lottery bid in 2023.

### **37.**

Below is Manchester Airports Group (MAG) response to the public consultation for the draft Greater Manchester Local Nature Recovery Strategy.

MAG is the owner and operator of Manchester, London Stansted and East Midlands airports, the largest group of airports in the country. In addition, MAG also owns CAVU, providing physical and digital travel services for passengers and businesses across more than 300 airports worldwide.

Manchester Airport is proud to serve the North – connecting our region to the world. We now have more than fifty airlines operating to around 200 destinations. We also recently announced that, for the first time ever, we served more than 30million passengers over a rolling 12 months, cementing Manchester as the UK’s third busiest airport. Manchester Airport operations support 48,000 direct, indirect and induced jobs in the Greater Manchester area and a GVA of £3.5 billion, with even greater impacts across the North of England as a whole.

Our airports were the first in the UK to become carbon neutral in 2016 and we have set an ambitious target to transition our business to net zero carbon operations by 2038 in line with GM’s own targets. MAG are also committed to supporting the decarbonisation of the wider aviation industry and currently sit on the government’s Jet Zero Taskforce and chair Sustainable Aviation, the body delivering the industry’s net zero strategy and road-map.

We recognise that the loss of biodiversity is a global issue that affects everyone due to its environmental and human costs, and that addressing biodiversity and nature conservation is becoming increasingly important for every development sector and industry, including aviation. This is something that MAG is embracing.

Protecting nature and promoting biodiversity is an important part of MAG’s approach to sustainability and we recognise the responsibility that comes with operating our airports – with Manchester and Stansted Airport situated near protected habitats. We strive at all our airports, including Manchester, to work collaboratively with our local communities, and environmental and wildlife groups on the conservation and restoration of nature at and surrounding our airports.

MAG’s Conservation Strategy is set to be published in 2025. The Strategy will set out how we intend to continue the management and responsible stewardship of our natural assets at and around Manchester and our other airports. The Conservation Strategy will also outline MAG’s approach to the national policy to deliver biodiversity net gain.

We therefore strongly welcome and appreciate the opportunity to put forward our views on the draft Local Nature Recovery Strategy (LNRS) for Greater Manchester. Our comments are set out under the relevant chapter headings below.

Introduction, Vision and Targets

MAG are fully supportive of the overarching vision and aims for the strategy and, as a landowner with land identified within the LNRS, we recognise our role in contributing to the delivery of these. We welcome the setting of headline targets to track progress towards achieving the vision and aims. We are keen to have sight of the full list of targets and the monitoring framework to fully understand where action is to be focused and would appreciate the opportunity to discuss these targets with you ahead of their publication.

We note the distinction between the LNRS and the delivery plan that will be produced in 2025 to sit alongside the strategy. MAG would welcome the opportunity to be involved in the preparation of this delivery plan. We are involved extensively with land management on a substantial scale and have considerable experience and a strong, long-established approach to environmental management. This is demonstrated most notably by the successful implementation of an extensive Landscape and Habitat Management Plan as part of the development of the second runway at Manchester Airport. Involvement in the preparation of the delivery plan would allow for a more effective and joined-up approach.

Nature Network.

Setting out the spatial vision for nature recovery is a hugely important element of the LNRS. We welcome the interactive GM Nature Network Map to identify the Core Local Nature Sites and Nature Recovery Opportunity Areas. The Nature Network Map is a useful tool to help guide the delivery of the nature network and being able to navigate the map to view specific sites. The detail about key habitat types and the associated mapped actions is particularly beneficial. Adding further data layers to the map to expand the level of detail about the various priorities and the description of practical actions that can be viewed would help add to these benefits. Including datasets for priority species and management regimes would also be useful. This would create a more comprehensive and user-friendly tool that reduces the amount of navigation required between the Nature Network Map and the associated written descriptions contained within the strategy document and appendices. If the technology allows, it would also be of benefit to be able to view all of the data attributes by clicking on specific areas in the map itself.

We acknowledge the components of the nature network that are across MAG's landholding. MAG recognises the role that we can play in implementing the strategy and the contribution that we can make to realising its vision. Given the proximity of Manchester Airport's operation to both Core Local Nature Sites and Nature Recovery Opportunity Areas there

needs to be a joined-up approach agreed with MAG regarding the opportunities for delivering on the priorities and practical actions that have been set within the airport's Operational Area, including their future management. We are keen to discuss this in greater detail with you and would welcome further guidance on whether there will be any bespoke priorities and actions in the vicinity of Manchester Airport.

We would however like to flag the inappropriate identification of a Nature Recovery Opportunity Area within Manchester Airport's Operational Area, the area around Cloughbank Farm, to the east of Cotteril Clough and south of Wilmslow Old Road. This site is the subject of a commenced planning permission for airport operational use and therefore the inclusion of this site on the Nature Network map is inconsistent with the approach taken for the remainder of the airport site and thus inappropriate and should be removed from the map.

#### Priorities and Actions

We welcome the range of habitat and species priorities that are identified, and the practical actions that are linked to them. The division of habitat priorities into the six broad habitat types is useful. Within the 'woodlands, trees, scrub and hedgerows' habitat type we would like to see more detail on the priorities and practical actions for Ancient Woodland. Whilst reference is made to Ancient Woodlands, and they are included in the recovery network broadly (we note the practical action to 'safeguard, enhance and celebrate ancient, long-established and designated woodlands, veteran and notable trees'), there does not seem to be any specific detail on how these should be included in a joined-up approach beyond treating them as standard woodland. Clarity is needed on whether the Ancient Woodland areas should be prioritised or whether the intention is for them to be managed at the same priority level as other woodlands in the recovery network?

Due to the complex operational requirements of operating an airport (use of de icer, storage of fuel, etc.), there are risks of runoff to the surrounding area. Manchester Airport has a range of detailed environmental strategies and management plans that are independently reviewed as part of the airport's ISO 140001 accreditation. The current draft of the LNRS comments on 'identifying and tackling critical locations' on page 60, but it is not clear if these critical locations have been identified yet and we recommend that they be shown on a strategic map.

#### Aerodrome Safeguarding

Nature recovery and the enhancement of biodiversity across the city region has potentially significant implications for aviation safety and must therefore be carefully balanced with the regulatory need to protect the safety of aircraft and the operation of Manchester Airport. This can be achieved through the process of aerodrome safeguarding. The draft Strategy currently lacks acknowledgement of this vital regulatory and statutory component, and we would therefore require this be addressed in the final documents.

By virtue of its importance to the national air traffic system, Manchester Airport is an officially safeguarded aerodrome. This is to protect the safe and efficient operation of aircraft at and in the vicinity of the airport from potentially hazardous development and activity in the surrounding areas. Potentially hazardous development includes development and construction processes that may cause: an obstacle to aircraft; an attraction to birds; lighting or reflections that might present an ocular hazard; a wind shear hazard; thermal plumes; and interference with radar and other air navigation and communication systems. Legislative provisions regarding the aerodrome safeguarding process are set out in the Town and Country Planning (Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas) Direction 2002 (ODPM Circular 1/2003) and responsibility for all safeguarding activities rests with the aerodrome operator.

In accordance with Circular 1/2003, safeguarded airports are statutory consultees for certain planning applications for developments that require safeguarding to protect the airport's operation. Safeguarding Maps (which are held by the local planning authority – namely Manchester City Council for Manchester Airport) show the extent of the safeguarded area and set out the requirements for the statutory consultation. When considering the type, scale and design of any development within an airport's safeguarded area, consideration of the relevant aerodrome safeguarding criteria, consultation procedures, and any potential impacts on aircraft safety must be addressed. In the context of delivering biodiversity net gain, it is the potential for attracting birds that is of principal significance. If a development provides shelter and/or feeding, roosting or breeding opportunities for birds it may, depending on its siting in relation to the aerodrome, cause an increase in the number of birds visiting or overflying the aerodrome or the number of birds in the airspace used by aircraft. This would increase the risk of birdstrike to aircraft, compromising air safety. Under the provisions of Circular 1/2003, there must be no new or increased risk of the birdstrike hazard caused by development; this includes landscaping and habitat works.

The area safeguarded for bird attractant risk is not inconsiderable, comprising a 13km radius from the aerodrome (as indicated by a dotted circle on the Safeguarding Map). Safeguarded airports rely on being able to comment on any nature developments within this area that have the potential to increase the bird strike risk. We therefore strongly recommend that the Strategy acknowledges the aerodrome safeguarding constraints that are in place to ensure the safety of flight. The paragraph concerning Consultation on Page 46 needs to be expanded and/or a consultation bodies table be added to the strategy document to provide the following details:

Aerodrome Safeguarding – the need to ensure the safety of aircraft taking off, landing or flying in the vicinity of the airport.

Wildlife:

Aircraft are highly vulnerable to wildlife strike risk and species such as deer, badger and foxes can cause safety concerns, however birds are the most problematic species in the UK.

Bird strikes are one of the aerodrome's top risks and the airport is required under ICAO and CAA regulations to reduce the attractiveness of the area to birds/wildlife on and in the vicinity of the airport. The aerodrome has a robust wildlife hazard management regime on site, and also undertakes regular monitoring out to a radius of 13km from the airport. The monitoring includes checking planning applications that have the potential to increase the number of species of birds that are hazardous to aircraft and advising developers and local authorities how the risks can be reduced through design and management.

Nature developments that have the potential to increase the bird strike risk are:

- Areas of water such as reservoirs, lakes, ponds and wetlands
- Nature reserves or bird sanctuaries
- Restoration schemes for quarries
- New woodland or expanded woodland
- Large landscaping schemes with a high percentage of berry or fruit bearing species that could attract flocking birds in large numbers

- Golf course and housing landscaping, which may offer opportunities for waterfowl due to the creation of new waterbodies and the short grass provides potential feeding opportunities for grazing feral geese.

Not all of the above cause issues, it depends on the scale, design, proximity to the aerodrome and existing bird attractive sites. All developments are considered on a case-by-case basis.

Obstacles:

The area around the aerodrome is protected to ensure that obstacles are not created for aircraft or vital communications systems and provides adequate separation between aircraft and obstacles. Any areas of new tree planting may create obstacles in the future when trees reach a height that infringes the protected surfaces. In view of this, it is important to consult with the airport about the species proposed.

Thank you again for providing MAG the opportunity to engage with the draft LNRS consultation. MAG is strongly committed to the successful delivery of the Local Nature Strategy in line with our wider environmental commitments. We hope that you have found our comments of use, and we would welcome the opportunity to further assist in shaping the final strategy, particularly regarding the issues specifically flagged above.

**38.**

These comments are made by REDACTED. I have worked in ecology since REDACTED. All background papers of my work at Elton Reservoir Allocation are available on request and lodged with both the GMEU and Natural England and show I speak of facts and not baseless opinions. REDACTED 31/01/2025. I may submit my papers in any case to naturerecovery@greatermanchester-ca.gov.uk. This paper was submitted to this email address in response to the Greater Manchester Draft Local Nature Recovery Strategy. I am sorry but I do not have time to respond to your questionnaire, nor do I wish for my corrections and comments to be lost in an AI exercise. I raise below serious concerns about the process and outcomes which may result in a formal complaint later.

“Greater Manchester Declared a Biodiversity emergency in 2022. They desire to create a resilient network for nature across Greater Manchester”. This is not true. REDACTED land at Elton Reservoir Allocation. When a competent ecologist studies the site it is clear that a large part of the allocation warrants SSSI status on account of its 21 Waxcap Grassland

Fungi taxa, 8 Clubs/Spindles/Corals and several other scarce and notable species of fungus.

Elton Reservoir proposed Allocation is worthy of a Site of Special Scientific Interest designation and has surpassed English Nature's national SSSI threshold. All of Coney Green Farm and Old Hall Farm in Radcliffe within the allocation have been listed by Natural England as Priority Habitats legally requiring that local authorities take action to conserve the habitats. This was virtue of a Labour Government Law the NERC Act 2006. Conserving the habitats does not mean totally ignoring the value and allocating it to housing. The Priority Habitat survey data was collected in line with the PHI Evidence Requirements and accepted by Natural England. We also have in the adjacent Canal Whorled Water-milfoil (UK Red List) and at Elton Reservoir Common Cudweed (UK red List), Small Water-pepper (UK Red List) and Mudwort (Nationally Scarce)(all recent records). The list of Nationally Scarce invertebrates recorded grows with every survey (now at 43 taxa including one GMEU BAP species). The main Waxcap CHEGD area is Coney Green and Old Hall Farms with Elton Reservoir embankment and Bank Top Meadows. This year we have found three new Waxcap CHEGD sites at Brookbottom Farm, Dofferfold Farm and Bank Top Meadows (Coran Stud). Elton Reservoir Allocation also contains NE listed Lowland Fen Irreplaceable Habitat - scheduled for destruction.

I have included a map at the end and I would like you to include the additional areas shown in the Core and Opportunity Area maps, rather than white land. You will see the clip includes a Natural England map of Priority Habitats. I also attach as files a Waxcap grassland fungi precis, a spreadsheet of all fungi records and a location a map

18 Overview needs to mention Priority Habitats listed by Natural England. These can be found on MAGIC map and NE's own mapping system. The local authorities have a legal Biodiversity Duty to conserve them by virtue and the NERC Act 2006 and subsequent regulations.

19 Fungi – "Fungi are found in all habitats, from woodland to grassland to gardens. Some of our upland sites hold nationally significant grassland fungi populations." Given the fact that Elton Reservoir Allocation contains a nationally and possibly internationally valuable community of grassland fungi this sentence needs to be rewritten thus: "Fungi are found in all habitats, from woodland to grassland to gardens. Some of our upland sites and lowland

sites hold nationally significant grassland fungi populations.” Not to change this would lead to intentional public disinformation.

20 Rare Plant Species – You have room to add “Whorled Water-milfoil, Common Cudweed and Small Water Pepper.” All are IUCN Red List plants found at Elton Reservoir Allocation.

25 Otters are known to be breeding at Elton Reservoir Allocation. I have recorded and submitted my sighting from two metres of myself and them looking into each other’s eyes. I mean myself as a litterpicker and them as an adult Otter carrying a cub. And then them rushing past me and jumping into the water. I have recorded a mixed age population living across the Elton Reservoir allocation in recent years. So the following is misinformation: “Otters have been sighted in over half of Greater Manchester’s catchment after having dwindled to near extinction – this is a strong indication they are now resident here and increasing.” The word “strong indication” is an issue here. It means there is no proof. I am aware that REDACTED was spinning a yarn that they have 18km ranges so it does not mean they are breeding. But we have proof of breeding, which they must have withheld from you. Please change to “Otters have been sighted in over half of Greater Manchester’s catchment after having dwindled to near extinction – they are now known to be breeding in the County.” To do otherwise is the deliberate spreading of misinformation

26 Woodland, trees, hedgerows - I worry that grassland fungi sites will be destroyed by treeplanting.

32 Grassland and Farmland – The Elton Reservoir Allocation contains the largest area of species-rich grassland Priority Habitat grassland in the county – It includes Lowland Meadow PH, Rush Pasture PH, Lowland Fen PH, Flood Plain Grazing Marsh PH, and all stuffed with Waxcap CHEGD grassland fungi. In the north 7.3 hectares, in the middle 38.47 hectares, in the south 22.67 hectares. Total farmland/grazing Priority Habitat 68.44 hectares, and there is additional NE listed Lowland Fen Priority Habitat around the reservoirs and pond clusters. This is bigger and better than the two areas you cite (50 and 8 hectares) so I am calling you out for Disinformation. You need to add in Elton Reservoir area to this section. You also need to mention the grassland Priority Habitat names

34 Pressures on nature – REDACTED. This is a real problem, the biggest pressure on nature

34 Litter – You have in this section listed a few problems and a few solutions. Why not give a shout out to Litterpicking Groups and their cause by mentioning them. We all have a role to play. You just list it as if it is an unsurmountable fact. Come to think do you mention any remedies to littering in this report. If not why not?

36 WHERE DO WE NEED TO GET TO?- This means:

36 “• Protecting and enhancing” REDACTED

37 “• Enhance and protect” REDACTED

38 “PROTECT: To increase the amount of land designated for nature from 11% to 15% of the city region.” REDACTED

37 “• Act together: Working together to take action for nature and embed space for nature and people to thrive across all our communities.” The Elton allocation is a perfect example of where the local community led by a skilled and experienced consultant ecologist acted together to reveal the SSSI quality value of the habitats. REDACTED

40 NATURE NETWORK: WHERE IS BEST FOR NATURE? - “To drive nature recovery, we need to set out the best places to act for nature across Greater Manchester.” And “This involves recognising our best remaining wildlife sites as the building blocks for our Nature Network and taking action to:” REDACTED.

40 “The Greater Manchester Nature Network is based on established evidence and thinking on nature recovery in the UK, in particular the Lawton principles of “bigger, better, more and joined”. REDACTED

40 Did you know that REDACTED GMEU was commissioned and funded to do the earlier Opportunity Area Report? Around 2010. Every Biodiversity Opportunity Area from that report was allocated to urban expansion in the Places for Everyone GMSF plan. REDACTED

41 Core local nature sites: You have deliberately excluded designated wildlife corridors, Priority Habitats and RIGGS sites. Why?

42 Map is out of date in terms of the SBI boundaries (dark green core areas) Elton Reservoir and possibly other places. Also whilst I have brought up Elton Reservoir it is important to note the Places for everyone will destroy the Grade A Site of Biological Importance at Atherton (a Core dark green site). REDACTED

47 Planning status. I see in this document and in the districts a fundamental misunderstanding of what BNG is. All of the laws we had before are still there. There is the legal biodiversity duty to conserve Priority Habitats and Priority Species and nature laws and regulations and best practice. BNG is ADDITIONAL. REDACTED

47 Maps. There are some maps not in the draft document that appear in the consultation response. Why?

49 Right Habitat Right place. Best Practice. REDACTED. The survey work of myself has been thorough and is set out elsewhere. It is authoritative, experienced and skilled. It is based on months of survey work and identification, over several years now.

55 Woodlands, trees, scrub and hedgerows “More trees and woodlands along our river valleys are a particularly crucial way we could enhance connectivity for woodland species”. Elton Reservoir Allocation used to be part of the Croal Irwell Valley Subject Plan Area. REDACTED it is a large expanse of grassland fungi-rich grassland then planting trees here is exactly what is not needed. You would be destroying a valuable and rare habitats to enhance a common habitat That of woodland species. I also came across another grassland fungi site in the Bollin Valley in Cheshire last year where tree planting would also be the same wrong idea

59 Rivers, canals and waterbodies. “Priorities • More accessible and visible rivers, canals and waterbodies, with fewer barriers to species movement.” You’ll have to explain why destroying an inaccessible part of a riverside by putting a path through it will be better for nature. You don’t get that some wildlife needs seclusion. “• Increased habitat connectivity along our river corridors, canals and waterbodies.” Ok. I have been a REDACTED. I have not, for years, seen any Water Vole in a stream that was not in some way severed from the wildlife corridor network. I used to find them often in Wigan which is a chopped up plains landscape, not a river valley where the Mink roam free and spread. Last population I found were in Northwich where the stream issues from beneath an industrial estate where it was culverted, runs along same industrial estate, and then disappears back into the urban area in a culvert. No Mink can get there. I used this example at REDACTED to show why one should not automatically assume connectivity is a good thing. Unbroken corridors alongside streams also allow for the spread of Himalayan Balsam and Giant Hogweed.

64 Grassland, farmland and lowland heath. “To act for nature, we need to safeguard remaining seminatural grasslands and lowland heaths before they are lost.” REDACTED

“Priorities • Species-rich and semi-natural grasslands and lowland heath are safeguarded, well managed and restored.” REDACTED.

64 At this point you need to specifically include a reference to the importance of grassland fungi (in both lowland and upland grassland). Elton reservoir Allocation is a threatened lowland grassland fungi site of SSSI Quality.

Species priorities and actions

69 • Grassland fungi: You meant to refer to Olive Earthtongue. Please correct

69 • Grassland fungi: Now two of these Red Data species are present at Elton Reservoir REDACTED

69 • Grassland fungi: As you are listing Red Data Fungi then please list the following which are also present at Elton Reservoir: *Arrhenia peltigerina* UK Red Data Book Nationally Rare Glistening Waxcap IUCN Red List Endangered

69 • Mossland insects: Please add a Red Data book fly which is Nationally Rare IUCN Vulnerable and found at Elton Reservoir Allocation. It is a fenland species which are the wetter parts of more eutrophic mosslands in Greater Manchester. In any case its habitat at Elton includes a Lowland Fenland PH strip with *Sphagnum* moss i.e. a mossland.

“Species priorities and actions:

69 Why do you not have any priority species groups and actions for Higher Plants? Elton Reservoir has three Red Data listed plants which should be listed and have actions: Whorled Water milfoil, Common Cudweed and Small Water Pepper.

68/69 Priority Species is a legal terms for Section 41 Priority Species. You need to use a different term such as “GM Priority Species”.

71 “Willow tit Bespoke actions: • Identification and safeguarding of key remaining nesting sites and population strongholds.” The Elton Reservoir Allocation has breeding Willow Tit populations but the GMCA plan to put 1000s more people and cars into their habitat. REDACTED

72 European hornet Bespoke actions: • Increased awareness raising and education. • Increased monitoring and identification of population strongholds. • Reduced nest

disturbance or destruction. How odd. I have REDACTED and their response is to support Bury Council's plans that most of the area be destroyed for housing

71 Hedgehog. The Hedgehog also lives in the countryside and REDACTED. Your actions do suggest anything to help the Hedgehog here

72 "Manchester black poplar Bespoke actions: • Identification, safeguarding and monitoring of existing trees." The Elton Reservoir Allocation area has a Black Poplar on the Irwell River island directly below and adjacent the Hinds Mill weir which REDACTED And when the changed river pulls down the tree it will be REDACTED

74 "Migratory fish: Atlantic salmon, european eel General habitat interventions that will support recovery: • Improve mobility (restoring migratory pathways upstream) by removing barriers such as weirs, daylighting buried or covered waterbodies or installing by-pass structures, where feasible". Let me tell you what the destruction of the Hinds Mill Weir will do: Remove an Otter sprainting point; Join a river island to the bank thereby threatening badgers and otters which live there; remove an on river pond, thereby reducing habitat diversity for fish and aquatic life including plants and invertebrates; cause the alien Giant Hogweed and Himalayan Balsam to spread onto the new mudflats; remove a fish filled pool thereby reducing Otter feeding opportunities; expose river rubbish which will not be removed; threaten the adjacent Black Poplar; destroy a Common Toad Priority Species breeding pool. What will it gain? Nothing as there is a weir with a hydro plant on it 1.2 km downstream. The stupidity of some people with public money beggars belief.

74 "Grassland ground nesting birds: Curlew, lapwing, twite, skylark, golden plover, dunlin, snipe. Bespoke actions: • Identification, safeguarding and monitoring of important remaining sites." Elton reservoir Allocation is a major Lapwing breeding site for Greater Manchester, with breeding Skylark and feeding Snipe (60 + at one pond). REDACTED. Elton Reservoir Allocation is a large area of grassland, hedges and water in the middle of the county. It is a service station for migrating and dispersing birds. 200 species regularly recorded.

REDACTED

74 Grassland fungi: Pink waxcap, jubilee waxcap, oliver earthtongue, Powdercap strangler, violet coral Bespoke actions:

- Identification, safeguarding and monitoring of important remaining sites.

- Landowner and land manager engagement and support. REDACTED with a SSSI quality grassland fungi community? It has two of the species you have in the list and two further species you have missed off the list.
- General habitat interventions that will support recovery.
- Enhance and appropriately manage remaining semi-natural grasslands to good condition, including avoiding use of pesticides, herbicides and nitrates and appropriate grazing and livestock management.
- Showcase successful grassland management and encourage awareness of the value of our remaining semi-natural grassland.

As already mentioned please add in the two missing Red Data listed fungi found at Elton Reservoir: *Arrhenia peltigerina* UK Red Data Book Nationally Rare, Glistening Waxcap IUCN Red List Endangered, Please change Oliver Earthtongue to Olive Earthtongue.

REDACTED with a SSSI quality grassland fungi community? It has two of the species you have in the list and two further species you have missed off the list.

75 The naming convention for scientific names is first part starts with a CAPITAL second part lower case. So there is no such insects as Brownfield insects: *trifurcula cryptella* Mossland insects: *crambus hamella*, *gelechia cuneatella*, *glyphipterix haworthana*, *lampronia fuscata*, *monochroa suffusella* or *phiaris schulziana*.

Giving the English proper names in all lower case or a mix (yes you use several rules) looks childish and sloppy. First name starts with capital second name start with a capital. For instance, how would a non-naturalist know if a small tortoiseshell is a Small Tortoiseshell or a Tortoiseshell that you were saying was small. Bat, Frog, Toad are not complete full names so it is OK to use lower case in those instances but it should always be Pipistrelle Bat, Common Frog, Common Toad.

76 Reintroductions." Beaver. • Beaver: Successful reintroductions of beavers have taken place in several locations nearby to Greater Manchester, including at the Hatchmere Nature Reserve in Cheshire." I am astonished that you claim the Beaver introduction at Hatchmere is a success. You had not seen any proof at the time you wrote this draft, as REDACTED.

81 What more do we need to be successful? Tell the truth, only accept the truth in future. REDACTED.

REDACTED.

REDACTED.

**39.**

Unfortunately there has been limited time in which to respond to this strategy and I'm not convinced that by using the website submission will reach you before tonight's deadline.

I am aware of the complex and comprehensive research and response that has been submitted by the REDACTED and want to take the opportunity to support the observations and comments made within their submissions.

18 Overview needs to mention Priority Habitats listed by Natural England. There are many at Elton Reservoir Allocation. These can be found on MAGIC map and NE's own mapping system. The local authorities have a legal Biodiversity Duty to conserve them by virtue and the NERC Act 2006 and subsequent regulations.

19 Fungi – "Fungi are found in all habitats, from woodland to grassland to gardens. Some of our upland sites hold nationally significant grassland fungi populations." Given the fact that Elton Reservoir Allocation contains a nationally and possibly internationally valuable community of grassland fungi this sentence needs to be rewritten thus: "Fungi are found in all habitats, from woodland to grassland to gardens. Some of our upland sites and lowland sites hold nationally significant grassland fungi populations."

20 Rare Plant Species – You have room to add "Whorled Water-milfoil, Common Cudweed and Small Water Pepper." All are IUCN Red List plants found at Elton Reservoir Allocation.

32 Grassland and Farmland – The Elton Reservoir Allocation contains the largest area of species-rich grassland Priority Habitat grassland in the county – It includes Lowland Meadow PH, Rush Pasture PH, Lowland Fen PH, Flood Plain Grazing Marsh PH, and all stuffed with Waxcap CHEGD grassland fungi. In the north 7.3 hectares, in the middle 38.47 hectares, in the south 22.67 hectares. Total farmland/grazing Priority Habitat 68.44 hectares, and there is additional NE listed Lowland Fen Priority Habitat around the reservoirs and pond clusters. This is bigger and better than the two areas you cite (50 and 8 hectares) so I am calling you out for Disinformation. You need to add in Elton Reservoir area to this section. You also need to mention the grassland Priority Habitat names.

36 “• Protecting and enhancing” Why on earth do you say the county needs to be PROTECTING REDACTED

37 “• Enhance and protect” Why do you say the county needs to be PROTECTING REDACTED

38 “PROTECT: To increase the amount of land designated for nature from 11% to 15% of the city-region.” REDACTED

37 “• Act together: Working together to take action for nature and embed space for nature and people to thrive across all our communities.” The Elton allocation is a perfect example of where the local community led by a skilled and experienced consultant ecologist acted together to reveal the SSSI quality value of the habitats. REDACTED

40 NATURE NETWORK: WHERE IS BEST FOR NATURE? - “To drive nature recovery, we need to set out the best places to act for nature across Greater Manchester.” And “This involves recognising our best remaining wildlife sites as the building blocks for our Nature Network and taking action to:” REDACTED

64 Grassland, farmland and lowland heath. “To act for nature, we need to safeguard remaining seminatural grasslands and lowland heaths before they are lost.” REDACTED

“Priorities • Species-rich and semi-natural grasslands and lowland heath are safeguarded, well-managed and restored.” REDACTED

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69 • Grassland fungi: Now two of these Red Data species are present at Elton Reservoir REDACTED

69 • Grassland fungi: As you are listing Red Data Fungi then please list the following which are also present at Elton Reservoir: *Arrhenia peltigerina* UK Red Data Book Nationally Rare Glistening Waxcap IUCN Red List Endangered

69 • Mossland insects: Please add a Red Data book fly which is Nationally Rare IUCN Vulnerable and found at Elton Reservoir Allocation. It is a fenland species which are the wetter parts of more eutrophic mosslands in Greater Manchester. In any case its habitat at Elton includes a Lowland Fenland PH strip with *Sphagnum* moss i.e. a mossland. Species priorities and actions:

69 Why do you not have any priority species groups and actions for Higher Plants? Elton Reservoir has three Red Data listed plants which should be listed and have actions: Whorled Water-milfoil, Common Cudweed and Small Water Pepper.

71 "Willow tit Bespoke actions: • Identification and safeguarding of key remaining nesting sites and population strongholds." The Elton Reservoir Allocation has breeding Willow Tit populations but the GMCA plan to put 1000s more people and cars into their habitat.  
redacted

72 European hornet Bespoke actions: • Increased awareness raising and education. • Increased monitoring and identification of population strongholds. • Reduced nest disturbance or destruction. How odd. REDACTED the presence of European Hornet at Elton Reservoir and their response is to support Bury Council's plans that most of the area be destroyed for housing.

71 Hedgehog. The Hedgehog also lives in the countryside REDACTED. Your actions do suggest anything to help the Hedgehog here.

72 "Manchester black poplar Bespoke actions: • Identification, safeguarding and monitoring of existing trees." The Elton Reservoir Allocation area has a Black Poplar on the Irwell river island directly below and adjacent the Hinds Mill weir which REDACTED. And when the changed river pulls down the tree it will be REDACTED that caused it.

74 "Grassland ground nesting birds: Curlew, lapwing, twite, skylark, golden plover, dunlin, snipe. Bespoke actions: • Identification, safeguarding and monitoring of important remaining sites." Elton reservoir Allocation is a major Lapwing breeding site for Greater Manchester, with breeding Skylark and feeding Snipe (60 + at one pond). Elton Reservoir Allocation is a large area of grassland, hedges and water in the middle of the county. It is a service station for migrating and dispersing birds. 200 species regularly recorded. REDACTED.

74 "Grassland fungi: Pink waxcap, jubilee waxcap, olive earthtongue, Powdercap strangler, violet coral.

Bespoke actions:

- Identification, safeguarding and monitoring of important remaining sites.
- Landowner and land manager engagement and support.
- General habitat interventions that will support recovery.

- Enhance and appropriately manage remaining semi-natural grasslands to good condition, including avoiding use of pesticides, herbicides and nitrates and appropriate grazing and livestock management.
- Showcase successful grassland management and encourage awareness of the value of our remaining semi-natural grassland.”

As highlighted earlier, please add in the two missing Red Data listed fungi found at Elton Reservoir: *Arrhenia peltigerina* UK Red Data Book Nationally Rare, Glistening Waxcap IUCN Red List Endangered I'm certain that there are many other areas of concern in protecting this area – all of which, even if listed in full, will be ignored and totally disregarded.

I'm certain that there are many other areas of concern in protecting this area – all of which, even if listed in full, will be ignored and totally disregarded

I trust that my support of the Elton Warden Service document will be considered together with a more in depth explanation submitted for your attention

#### **40.**

I would like to draw your attention to the following considerations before you publish the final draft of the Local Nature Recovery Strategy:

1. Protecting green and wild spaces should be a top priority. A key example of this is Ryebank Fields in Chorlton/Trafford. There has been extensive coverage of why this space must be protected, including conserving endangered species and veteran trees. The proposed development will not safeguard the future of the fields, and the land was gifted to MMU as recreational grounds, and therefore should be protected from development.
2. New developments seem to hide behind the terms 'housing crisis' and 'affordable housing'. Allowing new developments under these guises ignores the real issue of landlordism and a lack of social housing. If this were tackled properly, there would be a significantly reduced need for new homes.
3. Developers and land owners should be held accountable for the protection of and sustainability of land - including the prohibition of development where necessary. There are several disused or historic buildings in Manchester which have not been considered for

redevelopment, and instead green land is being built on. Some examples of these are Gablenook Nursery and Graeme House. I would advise you to read Historic England's guidance on developing disused and historic buildings. It is inexcusable to be 'green lighting' proposed new developments such as Ryebank Fields and Chorlton Precinct without these options being exhausted. In short - the most sustainable buildings are those that are already standing.

4. I find the strategy slightly hypocritical when Manchester City Council have chosen to demolish Chorlton Leisure Centre and Job Centre and sell the land to developers. This forces the local community to drive or take public transport to access basic facilities. Please can you explain how this is in alignment with the Council's sustainability goals?

I look forward to your response.

**41.**

Thank you for your reply earlier today about the maps, for the link and attached word doc. I had the same problem with this new link as previously, with the blue circle saying "loading interactive legend", but no map appearing. So I've blown up the map in the doc you sent, though this makes it pretty fuzzy.

I've filled in the online questionnaire as best I can but have added a few points below, to cover some of the last map-based questions, and to include some general points. Hope this is OK?

Re Lawton.

Keep the green corridors that we already have. Where there's a species-rich area, protect not only it, but the adjacent green areas so that the species can spread, to make those less well-endowed areas species-rich too. At the moment those species-poorer greenspaces don't get that enhancement, but are allowed to be damaged further, from nature's viewpoint. In places through the online submission I've said greenspaces need joining up, but see that Lawton was there before me, so Yes I agree with those principles, particularly that of joining them up.

1. One corridor that helps join several greenspaces is the Fallowfield Loop greenway (Floop), the disused railway route that runs from Fairfield to Chorlton, almost joining the Ashton canal to the Mersey. On your maps it looks important, in that it is the first EW green corridor south of the city centre. I spend a lot of time there as a volunteer (particularly with

Sustrans) along with other volunteers, enhancing and maintaining this route. As this is a designated route for active travel, we of course keep it maintained for cyclists etc, but with the needs of Flora and Fauna being given high priority. One important aspect is the absence of lighting, the aim being to maintain a dark corridor for insects and other animals after sunset. As can be seen on your map there is a short break in this greenway in Fallowfield ie. along Sherwood St and by Sainsbury's; I've highlighted this with a red line on the attached map. Anything that can be added here to ease the movement of fauna between the E & W sections would be appreciated, eg. closely planted trees, even pleached together, a grass verge etc? Happy to talk to anyone if more detail is needed about the Fallowfield Loop, and our volunteer gang is happy to implement further good enhancement suggestions.

2. To the S of the Floop are "the Meadows" that were until recently joined to the Floop by greenery, via the tree and hedge-lined Nelstrop Rd North and Highfield country park. (The Meadows lie between 4 roads Meadows Rd, Nelstrop Rd, Weston Grove and Langdale Rd, all in Stockport.) With the recent building of 57 houses on the horse field at the extreme SE corner of Levenshulme, at the SE end of Cringle Rd this connection has been broken, shown with the red circle. This green corridor needs reinstating. Sorry, but it was too hard to see on the blown up map that I have, how much of this greenery is included.

3. A general comment that comes from this and other experiences .....I think more power needs to be in the hands of GMEU and local council ecologists. It feels to me that they play a distant second fiddle to those people creating plans for more houses and more roads.

There's lots more detail - maps, photos etc in previous submissions to GM about associated aspects made over recent years, which I'm happy to send on, though some points will have been overtaken by events. And happy to talk about any aspects of this and the online submission.

## **42.**

The Friends of Turn Moss is an organisation of local volunteers with an interest in supporting nature recovery in our neighbourhood (Stretford/Chorlton Border and Mersey Valley).

We have worked constructively with Trafford Council, sports groups and other local stakeholders for many years.

We are very pleased that Turn Moss is included in the Nature Recovery Network, as our neighbour Longford Park is.

We are asking for Ryebank Fields, adjacent to Longford Park on the Stretford/Chorlton border, to also be included.

Longford Park is included in the proposed Network as an 'Opportunity area for Nature Recovery' linking via Turn Moss to Ivy Green / Broad Ees Dole Core areas.

The loss of Ryebank Fields to a housing development would impact significantly on the ability of wildlife to flourish in Longford Park, both because of the loss of wild habitat and also because of the closer presence of housing, roads, streetlights, noise etc.

We recognise that Ryebank Fields includes GMCA Priority Habitats (woodlands, trees, scrub and hedgerow plus several acres of semi-improved neutral grassland). [Q33 and Q37] The Fields are home to priority species including Hedgehogs, Black Poplar, and Swifts.

Including Ryebank Fields in the Nature Recovery Network would increase the size and resilience of the network, especially as Ryebank Fields has an even greater Nature value than Longford Park.

We look forward to seeing the Network established and are eager to work with the relevant authorities to 'protect and enhance existing wildlife rich spaces' which Ryebank Fields, like are own Turn Moss, definitely are.

Please recognise the important role that Ryebank Fields plays in our local area and include it, along with Longford Park and Turn Moss, in the Network.

#### **43.**

I am writing as a member of the community group, Bolton and Bury Swifts. As a group we focus on building dependent summer migrants, primarily Swifts and House Martins, to raise awareness and encourage new provision of nesting sites and protection of existing colonies.

Whilst I am pleased to see Swifts and House Martins listed as priority species, as buildings are not recognised as habitat, without very specific wording and recommendations, local authorities will be less likely to make provision.

The text of the strategy needs to state that nest boxes should be integrated bird bricks, BS 42021, wherever possible, a universal nesting space for several red listed bird species, including Swifts, Starlings and House Sparrows. Unlike Sparrow terraces they are permanent and maintenance free and can be used by more species.

Artificial House Martin cups can be installed in suitable sites.

The strategy needs to make recommendations for the protection of existing nesting sites and mitigation measures where disturbance is unavoidable, in the form of Swift boxes or bricks or soffit boxes.

#### **44.**

Ryebank Fields in Chorlton Manchester should be included in your Nature Recovery Network Initiative for the following reasons:

Since 1996 when Manchester Metropolitan University abandoned the fields, they have extensively rewilded into a mosaic of natural habitats. It is a fantastic green area accessible to all and a well used and much-loved community asset. The fields are home to over 1400 trees and countless birds, bats, mammals and pollinators. Ryebank Fields also act as a carbon sink and natural flood plain to combat air pollution in this densely populated urban area of south Manchester. It is a perfect example of a space reclaimed and recovered by nature.

Ryebank Fields meets all the required criteria as it contains the Priority Habitats including woodlands, hedgerow and grassland. The neighbouring green space Longford Park is already included in the draft network and connects Ryebank Fields to turn Moss and Chorlton Ees Core Areas. Including both Longford Park and Ryebank Fields would support habitat management by providing a wildlife 'refuge' from the more managed parkland as well as increasing the size and resilience of the Nature Recovery Network, especially as Ryebank Fields has an even greater nature value than the park.

I have recently discovered that Manchester City Council have chosen to exclude all Greenfield classified areas of land contained in their SHLAA (Strategic Housing Land Availability Assessment) from the proposed Nature Recovery Network areas. This is unsound because:

1. Manchester has double the amount of land required to meet central government calculated housing targets.
2. South Manchester has a measurable nature deficit, worse than North and East Manchester according to Manchester City Council's own reports.
3. SHLAA inclusion is no guarantee of development - it only indicates the landowner has aspirations to build, or there is a possibility. None of the Greenfield sites listed in the SHLAA have planning permission to build on them at this stage.
4. Manchester City Council have a published policy of using Brownfield sites first for development.
5. Inclusion of Ryebank Fields in the GMCA Local Nature Recovery strategy would not in itself prevent future development. What it will do is provide acknowledgement and recognition of the site as potentially important to Greater Manchester's Nature Recovery.

I would also add that the community submitted a proposal for Ryebank Fields to be designated as a designated local green space in April 2020, during Manchester City Council's initial Local Plan consultation period and in accordance with the National Planning Policy Framework. If designated local green space status is granted Ryebank Fields will have additional protection from development.

Please advise if I should also pursue this matter with Manchester City Council's Planning Executive as Ryebank Fields has been excluded due to their planning policy decision. Consequently, I do not know if the GMCA has the necessary powers to challenge or overrule this decision.

Organisations working to preserve and protect Ryebank Fields for future generations to cherish and enjoy include:

Friends of Ryebank Fields, Ryebank Fields Community Group, Friends of Longford Park, Women of Ryebank Fields, Trafford Ryebank Residents Association and Chorlton Craftivists.

Kind regards

# Glossary – Acronyms

APIB	Areas of particular importance for biodiversity
BNG	Biodiversity Net Gain
CIEEM	Chartered Institute of Ecology and Environmental Management
DEFRA	Department for Environment, Food and Rural Affairs
GM	Greater Manchester
GMCA	Greater Manchester Combined Authority
GMEU	Greater Manchester Ecology Unit
GMSF	Greater Manchester Spatial Framework
INNS	Invasive Non-Native Species
IUCN	International union for conservation of nature
LA	Local authority
LHM	Local Habitat Map
LNR	Local Nature Reserve
LNRS	Local Nature Recovery Strategy
LWT	Lancashire Wildlife Trust
MBC	Metropolitan Borough Council
MMU	Manchester Metropolitan University
NE	Natural England
NNR	National Nature Reserve
NPPF	National Planning Policy Framework
NROA	Nature Recovery Opportunity Areas
P4E/ PFE	Places for Everyone (previously known as Greater Manchester Spatial Framework)
RA	Responsible Authority
RSPB	Royal Society for the Protection of Birds
SBI	Site of Biological Importance
SHLAA	Strategic Housing Land Availability Assessment
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage System
TPO	Tree Protection Order

UU	United Utilities
VCSE	Voluntary, community and social enterprise sector