

Places for Everyone Representation 2021

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| <b>Family Name</b>  | Ornnithological   |
| <b>Given Name</b>   | Leigh   |
| <b>Company / Organisation</b>   | Leigh Ornithological Society  |
| <b>Person ID</b>  | 1287379   |
| <b>Title</b>  | Stakeholder Submission  |
| <b>Type</b>   | Web   |
| <b>Family Name</b>  | Ornnithological   |
| <b>Given Name</b>   | Leigh   |
| <b>Company / Organisation</b>   | Leigh Ornithological Society  |
| <b>Person ID</b>  | 1287379   |
| <b>Title</b>  | JPA 37: West of Gibfield  |
| <b>Type</b>   | Web   |
| <b>Soundness - Positively prepared?</b>   | Unsound   |
| <b>Soundness - Justified?</b>   | Unsound   |
| <b>Soundness - Consistent with national policy?</b>   | Unsound   |
| <b>Soundness - Effective?</b>   | Unsound   |
| <b>Compliance - Legally compliant?</b>  | Yes   |
| <b>Compliance - In accordance with the Duty to Cooperate?</b>   | No  |
| <b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b> | <p>Statement from Leigh Ornithological Society regarding Land west of Gibfield and the "Places for Everyone" plans, 2021.</p> <p>Paul Richardson, MB, BS, BSc.</p> <p>(Leigh Ornithological Society is a local volunteer nature conservation society which is in its 50th anniversary year, and has been honoured with the Queen's Award for Voluntary Service. I currently serve as its Conservation Officer, and make this statement on behalf of the committee and members of the society. )</p> <p>As stated in the Ecological representation by The Environment Partnership, (March 2019) this land includes "two Local Nature Reserves (LNRs) and five Sites of Biological Importance (SBI) within 1km of the site boundary. Two SBI's (Gibfield Park (North) and Gibfield Park (South)) are located on the northern half of the site."</p> <p>How are we to conclude that the planned development affecting this area is LEGALLY and indeed ENVIROMENTALLY and MORALLY sound, when it includes such locally significant areas for biodiversity?</p> <p>It is our unfortunate experience as a local volunteer society involved with all aspects of nature conservation, and not just birdwatching, that ENVIROMENTAL CONSIDERATIONS ARE GIVEN LOW PROFILE IN DECISION REGARDING DEVELOPMENT.</p> <p>- Environmental concerns are increasingly important to local and national public opinion. Natural England's 2019 report, "Monitoring of Engagement with the Natural Environment" (Sept 3rd 2019) shows that nine in ten adults in the UK are concerned about damage to our natural environment.</p> |

Let us look at some of the considerations from TEP's Environmental Representation concerning the West of Gibfield Site in more detail:

#### SECTION 2.0 - Areas of Constraint.

-Wildlife Corridors. (2.1 and Grassland 2.6) LOS has been talking about these for years, and it is gratifying to know that TEP is catching up with this concept. Elsewhere in the representation, the details of habitat include the description of considerable areas of both rare ACID GRASSLAND and less uncommon semi-improved grassland, and the information from the Greater Manchester Ecology Unit that the red listed SKYLARK nests on these grassland areas, along with records of other red list species such as Brown Hare. Grassland is an increasingly threatened habitat, having been once widespread across Wigan, and grassland species such as Skylark and breeding waders are increasingly threatened in the locality. A glance at the map of South Lancashire and North Cheshire will show how important the existing green corridors or stepping stones are in linking the wilder West Pennine moorland area with the mosslands to the south. We cannot go on destroying these stepping stone areas or corridors without adversely affecting movement of wildlife and bird migration.

-Great Crested Newt populations: 2.3 states that "29 ponds within the site boundaries, 14 of these are known to support populations of great crested newts. There is known to be an exceptional population of great crested newts across this site and common toad, a Section 41 species, is also known to be present." There is discussion about mitigation for the loss of these ponds. We address this concept below, together with the idea of "Biodiversity Net Gain".

-Protected and priority fauna. Section 2.14 states that "loss of grassland would result in the reduction in range for farmland bird species barn owl and brown hares (Section 41 species)," - this area is one of the most regularly patrolled by hunting Barn Owl, a Schedule One species. This is considered by TEP to be a factor of "Low Constraint", but we believe it would be considered by many of Wigan Council's local constituents to be a high priority to necessitate protecting the space for preservation of these iconic species. GMEU records also show that the iconic Wigan species, the Willow Tit, breeds in the wet willow carr habitat on the patch. If we are to preserve the genetic diversity of the Willow Tit pairs in the possible new National Nature Reserve, it will be essential to protect such outlying territories as well as the Greenheart area where they are mainly concentrated.

#### Opportunities for Development?

Much is made in the Environmental Representation of the opportunities for creation of a "Green Infrastructure Network" which creates a green gateway to the north of Wigan Borough. This network is envisaged to be created by linking ponds, wildflower and wooded zones and hedgerows between houses and commercial developments. Whilst this is obviously a more enlightened policy than covering the entire area with tarmac and concrete, would it not be far better for the biodiversity of the patch to preserve its designation as a Site of Biological Importance, and to improve and sensitively manage its entirety for the benefit of nature? Woodland suitable for Willow Tits, grassland suitable for Skylark, and ponds suitable for breeding by Great Crested Newt, take years to develop, and are not readily created artificially in a short space of time. Once such areas are lost to development, it is facile to suppose that it is easy to succeed in providing suitable environments so that rare species do not disappear from the locality.

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|  | <p>The concept of "Biodiversity Net Gain" is undoubtedly well-intentioned, but is it really possible to argue seriously that building several hundred homes and a considerable area of business and commercial property will be more beneficial for birds, bats, reptiles, amphibians, invertebrates and plants than leaving the space to act as the green lung and green corridor which is it at present?</p> <p>If we extrapolate this concept of Biodiversity Net Gain onto a larger canvas, then it implies that "nature" in the UK, which has been shown to be the most impoverished in Europe, would be better off if we extended the built environment to cover the entire nation, and included within the area our artificially created stands of woodland, our artificially dug ponds, and our artificial areas of planted wildflower meadow.</p> <p>At LOS, we appreciate the policies of Wigan Council over many years which have preserved and managed the "Greenheart" of Wigan, and which will hopefully soon result in the creation of an internationally significant National Nature Reserve. We feel that it would be a great pity if all our progressive vision about preserving the green heart leads us to disregard the green periphery, or the green gateways to the borough, and allow them to be developed inappropriately.</p> <p>Paul Richardson<br/>September 2021</p> |
| <p><b>Redacted modification - Please set out the modification(s) you consider necessary to make this section of the plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified above.</b></p> | <p>This particular area should be removed from plans for development, and should be afforded the protection it deserves, especially as large areas comprise Sites of Biological Importance.</p>   |