

Draft Bury Biodiversity
Strategy 2023
Consultation Summary
Report

July 2024

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1. Introduction

- 1.1 This report summarises the consultation on the draft Biodiversity Strategy for Bury and responses to it.
- 1.2 The 'biodiversity duty' expanded by the 2021 Environment Act requires public authorities who operate in England to consider what they can do to conserve and enhance biodiversity. The draft Bury Biodiversity Strategy was produced in response and approved by Cabinet for consultation on 13 December 2023.
- 1.3 The draft Strategy was subject to stakeholder and public consultation from 9 January 2024 to the 20 February 2024, and the Strategy has now been updated in response to the consultation.

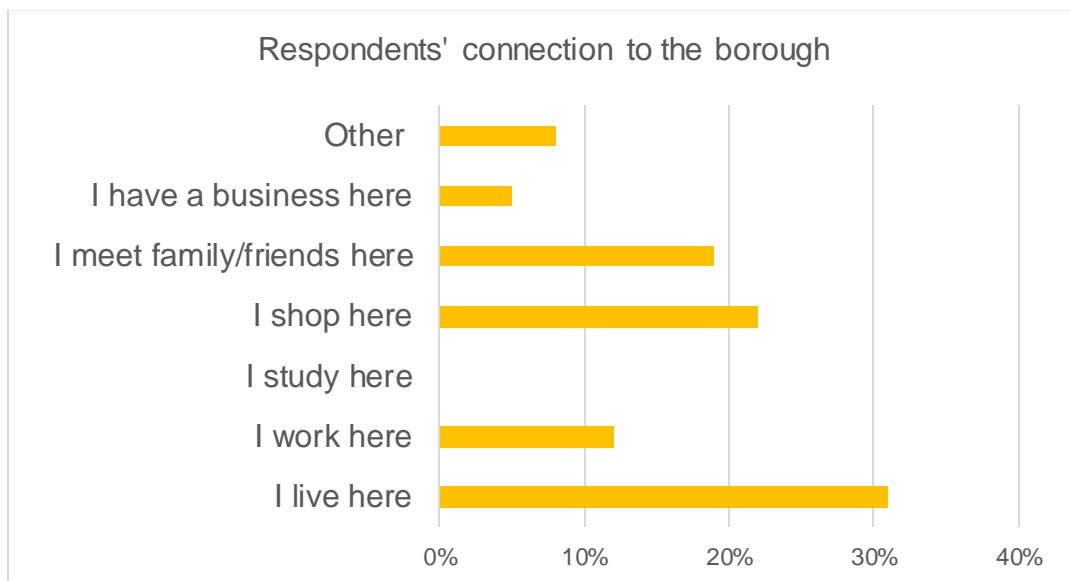


Figure 1 - Respondents' connection to the Borough

2. Consultation findings

The current state of biodiversity in the Borough

- 2.1 52.4% of respondents agree or strongly agree that the strategy reflects the current state of biodiversity in the borough. 23.8% remained neutral. 23.8% disagree or strongly disagree.

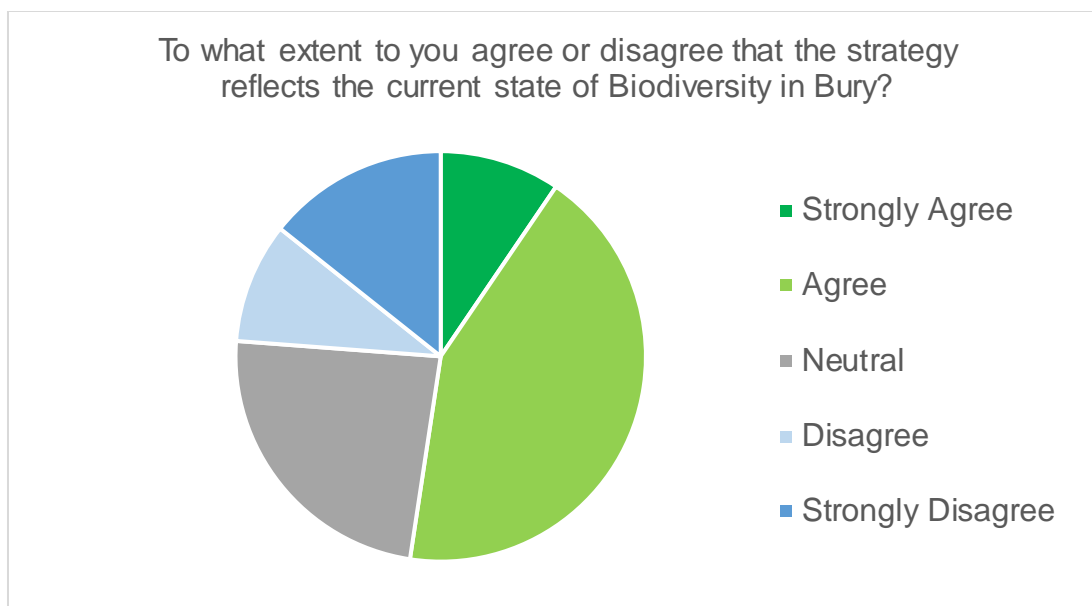


Figure 2 – Respondents’ opinions about whether the Strategy reflects the current state of biodiversity in the Borough

2.2 When asked to give a reason for their answer, respondents stated the following:

Summary of comment	Response	Change required
Stop development of PfE allocation JPA7 Elton Reservoir as this is where the biodiversity is.	The Places for Everyone Plan was found sound following an independent examination which considered all ecological evidence for the Elton Reservoir site. The Plan was subsequently adopted by full Council with effect from 21 March 2024.	No change
It reads well however, there isn't the staff or skill set to identify all that Bury has.	The Greater Manchester Ecology Unit (GMEU) provides specialist advice to Bury Council on biodiversity, nature conservation and wildlife issues.	No change
The plan doesn't state measured site goals.	Section 4 of the strategy outlines the Council's goals.	No change
The development and maintenance of borough records with regard to Biodiversity are not well known to the general	Objective 1 of the Strategy is to Improve our understanding and awareness of Biodiversity	No change

public. For the strategy to be significant the education/informing of the residents in terms of Biodiversity needs to be stronger.	through the following actions: <ul style="list-style-type: none"> - Encourage public reporting of species to GM Records Centre - Update Council webpages on biodiversity - Support local communities in acquiring and spreading understanding 	
The strategy should make a difference.	Support noted	No change
Lack of detail and it would be helpful to understand where some of the conclusions have come from.	The Strategy is the first step in considering what the Council can do to help biodiversity. The Strategy has been written in consultation with the Greater Manchester Ecology Unit (GMEU).	No change
Questions how SBI sites are going to achieve the biodiversity targets.	The Greater Manchester Ecology Unit (GMEU) monitor the Sites of Biological Interest in the Borough on a regular basis. However a number of these sites are privately owned and the Council has no control over their management.	No change
Suggests that as part of the strategy SBIs are reassessed to determine current condition and a new management plan is drafted to ensure a good quality habitat.	The Greater Manchester Ecology Unit (GMEU) monitor the Sites of Biological Interest in the Borough on a regular basis.	No change
I agree with those listed but would say buildings should be included as they are a key habitat for species like	This is an omission.	Chapter 2 amended to incorporate the role that

bats, swifts and swallows amongst others.		buildings play in the borough for nesting.
Fair reflection of our current biodiversity	Support noted	No change
Bury has lots of green spaces but I think they should be better protected and I would like to see more biodiversity. Hedgehog highways would be good.	This is an omission.	Chapter 3 amended to incorporate reference to creation of hedgehog highways as an action that the general public could take.
Whilst good work is being done, much more could be done within the town itself, such as provision of nest boxes, swift and bat bricks, house martin nests, etc.	Support noted. The Council resolved to require best practice standards for inclusion of swift boxes in the new Bury Local Plan in July 2024 and ensure that any plans to re-roof the Council's housing stock is seen as an opportunity to install swift bricks.	Chapter 2 amended to incorporate the role that buildings play in the borough for nesting.
There is a great deal of countryside to the north of Bury and interlinked parks which are not being utilised	The Greater Manchester Local Nature Recovery Strategy will identify opportunities for linking up green spaces for nature recovery.	No change
Giant Hogweed is infesting our valleys	Paragraph 2.10 recognises Bury has an increasing problem with invasive species including giant hogweed.	No change
Statement about otters is wrong. Otters are breeding at Elton Reservoir.	Paragraph 2.8 states that otter signs have recently been found on the River Irwell.	No change
At 1.11 Insert "legal" before "duty"	The Act is a legal document and therefore it is already implied.	No change

Reference to 6 protected species is wrong. Elton Reservoir Basin has hosted thirty four Schedule 1 Protected birds since 2017. It has hosted 29 Section 41 Priority Species bird species since 2017	The list includes winter visitors however the number should be amended to clarify that this is a list of examples rather than a complete record.	Chapter 2 amended to broaden list and avoid confusion that this is not a comprehensive list, rather that it is a list of example species.
The SBI Map on Page 10 is out of date (only partially updated). You omit the SBI extension to Wetland Near Radcliffe, whilst Close Park Heronry is a new SBI.	This map is the latest adopted update.	No change
You could do a whole new section on the Priority Habitats shown on MAGIC map near Elton Reservoir	This strategy does not seek to assess the condition of specific sites in the Borough.	No change
Should talk about wetlands.	This is an omission.	Chapter 2 amended to update the Landscape Character area Map which includes the reclaimed land/wetland areas in the borough.
Disagrees with the inclusion of PfE Policy JPG9 and the PfE Plan.	The Places for Everyone Plan was found sound and was adopted by full Council with effect from March 2024.	No change
Make a commitment to Priority Species and Priority Habitats	Specific measures will be developed through the implementation of the strategy.	No change
2.9 excludes farmland bird Lapwing.	The listed species are examples rather than a comprehensive list.	No change
Concerns about wildflower seedings. You make it expensive to plough and sow, and when it is over	This feedback will be provided to the Operations team.	No change

flowering it looks rubbish and people complain. All you need to do it treat some of the verges like a hay meadow and the species will come back.		
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Proposals for land management

- 2.3 52.4% of respondents agree or strongly agree with the proposals for land management in Bury. 19% remained neutral. 28.5% disagree or strongly disagree.

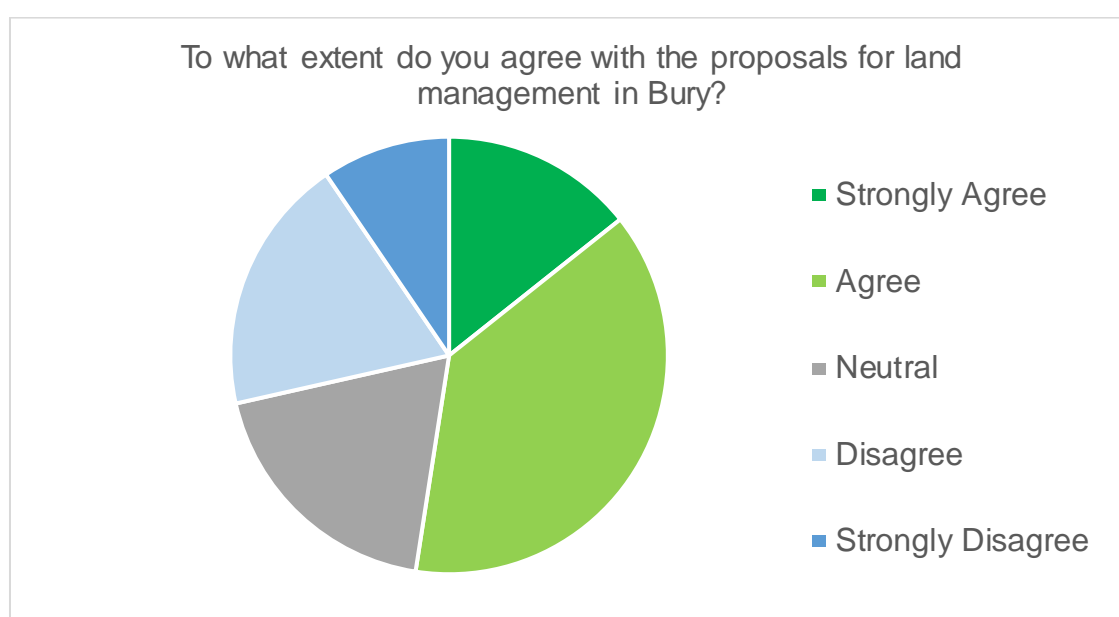


Figure 3 – Respondents’ opinions about the proposals for land management in Bury

- 2.4 When asked to give a reason for their answer, respondents stated the following:

Summary of comment	Response	Change required
Stop development of PfE allocation JPA7 Elton Reservoir as this is where the biodiversity is.	The Places for Everyone Plan was found sound following an independent examination which considered all ecological evidence for the Elton Reservoir site. The Plan was subsequently adopted by full Council with effect from 21 March 2024.	No change

Bury council and other agencies have shown a lack of commitment and enforcement. Reports of industrial fly tipping and pollution at all levels has not been enforced.	The Council is committed to enforcement and will respond accordingly where known breaches occur.	No change
No detailed goals or actions	Section 4 of the strategy outlines the Council's goals.	No change
Tying in biodiversity strategies with land ownership and potential ownership/purchase of bio important land should be an important aspect of the policy going forward	This will be considered in the implementation of the strategy.	No change
Bury council are the largest land owners.	It is recognised that Bury Council is a large landholder in the borough in the section of the Strategy : Managing land for biodiversity.	No change
Page 11 has many useful ideas, however again it does not present any detail. Par 3.9 & 3.14 are the link but they do not give any detail of what will actually change. It is assumed that many of the parties listed will also provide the funding.	Page 11 presents specific actions the Council has taken to manage its land in a way that benefits biodiversity and this is considered to be a sufficient level of detail. Paragraph 3.9 includes examples of how several services could take opportunities to improve policies and practices. This is considered to be a sufficient level of detail. 3.15 indicates the next steps related to paragraph 3.14.	No change
I would like to see specific measures and sites listed like living walls and roofs on new buildings, integrated bird bricks on all new builds.	Specific measures will be developed through the implementation of the strategy however, the strategy has been amended to incorporate the role of buildings as habitats.	Chapter 2 amended to incorporate the role that buildings play in the borough for nesting.

I agree with ideas listed but would like to see more action, stopping, not reducing, glyphosate use.	Specific measures will be developed through the implementation of the strategy.	No change
Bury council needs to do a great deal more to preserve our existing sites, and nature trails including not allowing building on wildlife corridors and habitats.	Various types of green spaces, including wildlife corridors, are protected from development that would have an adverse impact by policies in the Unitary Development Plan and the Places for Everyone Plan.	
Management of Kirklees trail is poor, no woodland management or management of the ponds for wildlife.	This feedback will be provided to the Operations team.	No change
Would like better protection for our green spaces and them to be fully protected against development.	Various types of green spaces are protected from development that would have an adverse impact by policies in the Unitary Development Plan and the Places for Everyone Plan.	No change
I agree with the above, but buildings should also be recognised as wildlife habitats, eg building dependent species	Support noted. An amendment is proposed in order to recognise the value of buildings for particular species. Specific measures to support local communities will be developed through the implementation of the strategy.	Chapter 2 amended to incorporate the role that buildings play in the borough for nesting.
I agree with the points but also feel that there is zero point in trying to artificially manufacture these habitats when instead we could focus on clean up all the trash, to reduce microplastic pollution which impacts the microbiome of the soil and subsequently the biodiversity of any vegetation that grows.	Specific measures will be developed through the implementation of the strategy.	No change

Questions quality of ecologists. Asks the Council to report any consultancy that fails to prepare adequate information.	This is not a matter covered by the strategy.	No change
Concerns that 'mitigation' is just lip service and destroys habitats.	Mitigation helps to reduce harmful impacts and enhance positive impacts for the environment.	No change
Concerns that greenspace provided by developments will just be developed at a later date.	Policy RT1/1 of the Bury Unitary Development Plan protects green space by developments	No change

Providing advice and increasing awareness

2.5 66.6% agreed or strongly agree with the proposals for providing advice and increasing awareness. 19% remained neutral. 14.3% disagree or strongly disagree.

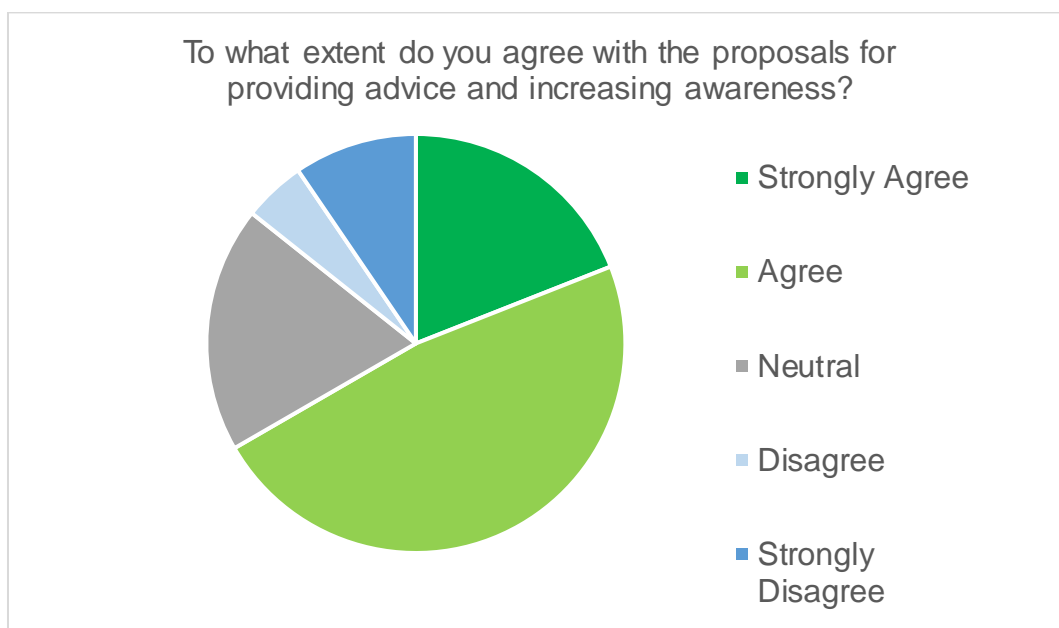


Figure 4 – Respondents' opinions about providing advice and increasing awareness in the borough

2.6 When asked to give a reason for their answer, respondents stated the following:

Summary of comment	Response	Change required
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Stop development of PfE allocation JPA7 Elton Reservoir as this is where the biodiversity is and local people are aware – they are trying to save nature	The Places for Everyone Plan was found sound following an independent examination which considered all ecological evidence for the Elton Reservoir site. The Plan was subsequently adopted by full Council with effect from 21 March 2024.	No change
Needs dedicated resource, at the moment not many authorities have a dedicated biodiversity officer.	Specific measures will be developed through the implementation of the strategy.	No change
It will help more people to get involved.	Support noted.	No change
This work is already ongoing with these parties and whilst it should be encouraged and developed further, the key will be what other NEW initiatives and ways forward is the Borough considering and how will it take this forward. There appears to be a great deal of reliance on 3rd parties which whilst essential should not be seen as the only way forward.	Specific measures will be developed through the implementation of the strategy.	No change
more needs to be done	The Biodiversity Strategy includes a number of measures that will improve advice and awareness of Biodiversity in the borough.	No change
Getting residents involved and engaged with nature will encourage people to protect what we have	Support noted	No change
People need to be engaged in easy, accessible and practical ways or it will come across as patronising.	Specific measures will be developed through the implementation of the strategy.	No change

Good to get people involved.	Support noted	No change
Defamatory comments.	The Greater Manchester Ecology Unit (GMEU) provides specialist advice to Bury Council on biodiversity, nature conservation and wildlife issues. They are a collection of highly qualified and experienced ecologists.	No change

Objectives of the Biodiversity Strategy

2.7 The Biodiversity Strategy proposes 3 objectives:

Objective 1: Improve our understanding and awareness of biodiversity in Bury.

Objective 2: Consider biodiversity in all Council decision making.

Objective 3: Bring about the recovery of nature in the Borough in line with national and city-region objectives and targets.

2.8 90.4% of respondents agree or strongly agree with Objective 1. 4.8% remained neutral and 4.8% strongly disagree with Objective 1.

2.9 85.7% of respondents agree or strongly agree with Objective 2. 4.8% remained neutral. 9.6% disagree or strongly disagree.

2.10 76.2% of respondents agree or strongly agree with Objective 3. 9.5% remained neutral. 14.3% disagree or strongly disagree.

To what extent do you agree or disagree with Objective 1 :
Improve our understanding and awareness of Biodiversity

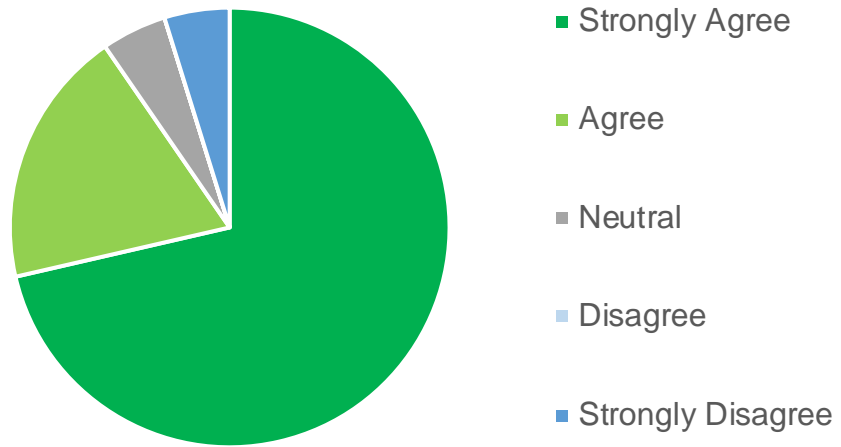


Figure 5 – Respondents’ opinion on Objective 1

To what extent do you agree or disagree with Objective 2 :
Consider biodiversity in all Council decision making

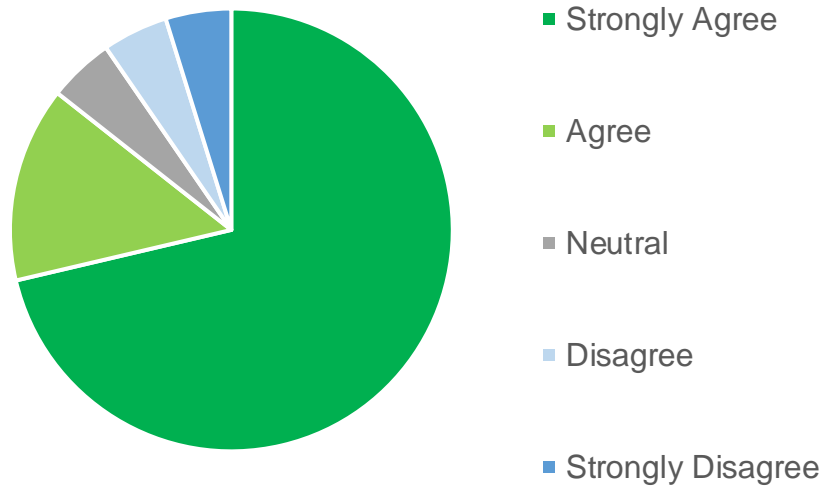


Figure 6 - Respondents opinion on Objective 2

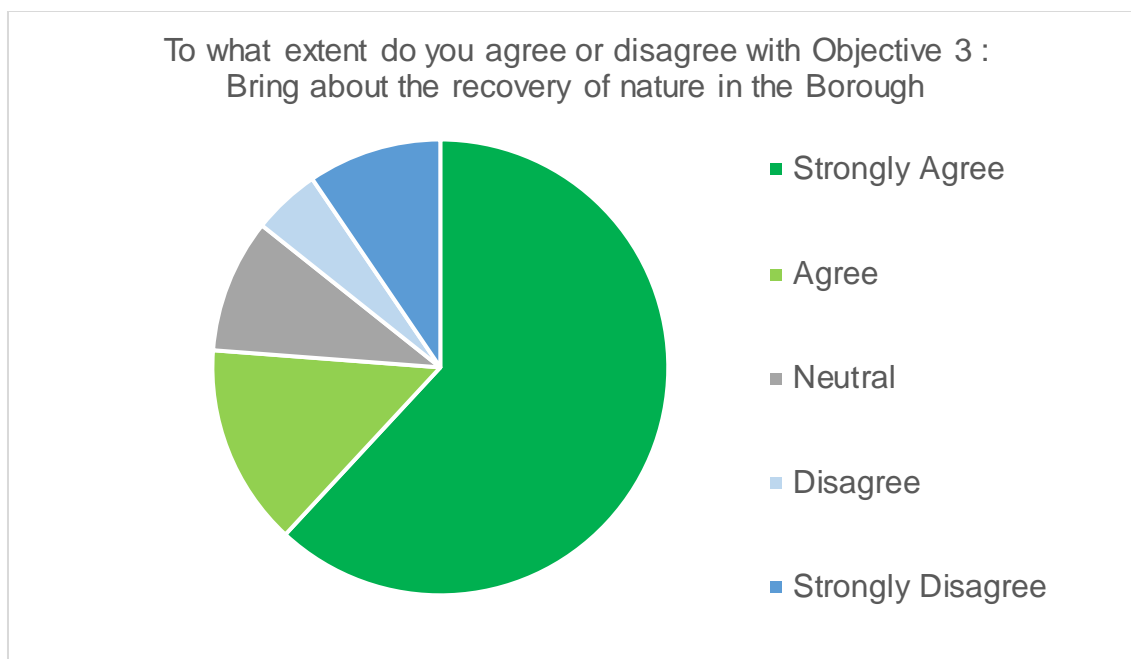


Figure 7 - Respondents opinions on Objective 3

2.11 When asked to give a reason for their answer, respondents stated the following:

Summary of comment	Response	Change required
Stop development of PfE allocation JPA7 Elton Reservoir as this is where the biodiversity is. Do not build on green land.	The Places for Everyone Plan was found sound following an independent examination which considered all ecological evidence for the Elton Reservoir site. The Plan was subsequently adopted by full Council with effect from 21 March 2024.	No change
With stated achievable goals for each SBI LNR.	Specific measures will be developed through the implementation of the strategy.	No change
There is plenty about Bury Biodiversity that has previously been consolidated but is in danger of slipping down the ranks of importance due to cash constraints. The Borough's parks have been exemplary for years but are now in decline due to resources. This trend needs to be reversed if the biodiversity	This comment isn't about the objectives, but the implementation of them. Specific measures will be developed through the implementation of the strategy.	No change

policy outcomes are to be achieved.		
So much wildlife is in decline.	Paragraph 1.3, 1.5-1.7, and 2.6 refer to the decline in wildlife.	No change
The three objectives are key to the success of the strategy.	Support noted.	No change
I am concerned about the loss of habitat for wildlife with the proposed development of the Elton Reservoir area and green spaces that surround it.	The Places for Everyone Plan was found sound following an independent examination which considered all ecological evidence for the Elton Reservoir site. The Plan was subsequently adopted by full Council with effect from 21 March 2024. The allocation includes the requirement to provide a substantial accessible green infrastructure corridor and country park.	No change
I would like to see a list of actions that will be taken, like hedgehog highways and bird bricks in new developments.	Specific measures will be developed through the implementation of the strategy however we have amended the strategy to incorporate the role that buildings play in the borough for nesting and the creation of hedgehog highways as an action that the general public could take	Chapter 2 amended to incorporate the role that buildings play in the borough for nesting and Chapter 3 amended to incorporate reference to creation of hedgehog highways as an action that the general public could take
I have a young family and want my son to see as much I did growing up in Bury	Comment noted.	No change
It would be nice for Bury to become a leader in biodiversity and show other councils what can be achieved. Working with the	Specific measures will be developed through the implementation of the strategy.	No change

RSPB and other similar charities, Bury could become a beacon for biodiversity.		
The onus needs to be on Bury council members getting up to date with all the latest research, as well as the traditional, and oft-forgotten old ways of managing land in line with nature.	Specific measures will be developed through the implementation of the strategy.	No change
All for biodiversity and considering biodiversity in council decisions.	Support noted.	No change

2.12 66.7% of respondents agree or strongly agree with the proposed actions to meet these three objectives. 9.5% remained neutral. 23.8% disagree or strongly disagree. Respondents provided the following feedback:

Summary of comment	Response	Change required
Stop development on green land and of PfE allocation JPA7 Elton Reservoir as this is where the biodiversity is. Strategy is for show	The Places for Everyone Plan was found sound following an independent examination which considered all ecological evidence for the Elton Reservoir site. The Plan was subsequently adopted by full Council with effect from 21 March 2024.	No change
Strategy is too general and meaningless	The strategy sets out three key objectives, and 21 actions, to support Biodiversity in Bury. Specific measures will be developed through the implementation of the strategy.	No change
Needs dedicated resource to carry through required outcomes	Resourcing will be considered through the implementation of the strategy.	No change
Something needs to be done now.	Once the Strategy is adopted, the measures set out within it will guide actions going forward	No change

<p>There is a lack of commitment to objectives it is unclear how they will be implemented. Overall it would be helpful to have examples of actual action that will be undertaken.</p>	<p>Specific measures will be developed through the implementation of the strategy.</p>	<p>No change</p>
<p>I agree with all the actions listed but would like the council to decide on priority species including Swifts, Hedgehogs, Lapwings and consult with local groups and put mandates in planning to ensure developments have to comply with recommendations.</p>	<p>Specific measures will be developed through the implementation of the strategy.</p>	<p>No change</p>
<p>Would like to see more species specific aims, adopt a list of local priority species and take specific actions to help e.g. Hedgehog highways and swift bricks</p>	<p>Specific measures will be developed through the implementation of the strategy.</p>	<p>No change</p>
<p>You need to put your actions into practice and really make a difference to our beautiful borough which could be so much more in terms of biodiversity</p>	<p>Once the Strategy is adopted, the measures set out within it will guide actions going forward</p>	<p>No change</p>
<p>I want more definite plans, like hedgehog highways and swift bricks in all new builds</p>	<p>Specific measures will be developed through the implementation of the strategy however we have amended the strategy to incorporate the role that buildings play in the borough for nesting and the creation of hedgehog highways as an action that the general public could take Additionally, the Council resolved to require best practice standards for inclusion of swift boxes in the new Bury Local Plan in July 2024 and ensure that any plans to re-roof the Council's housing stock is seen as an opportunity to install swift bricks.</p>	<p>Chapter 2 amended to incorporate the role that buildings play in the borough for nesting and Chapter 3 amended to incorporate reference to creation of hedgehog highways as an action that the general public could take</p>

It's not the big headlines that make impactful, longlasting change, it's the little things, such as encouraging the community to have pride in their town and the environment, showing people how easy it is to attract pollinators and wildlife to their gardens, and actively promoting real lawns and taxing the artificial lawn companies that are polluting our neighbourhoods.	In table 1 of the strategy, an action to support local communities in acquiring and spreading understanding is proposed. Specific measures to deliver this action will be developed through the implementation of the strategy.	No change
Could be more specific plans.	Specific measures will be developed through the implementation of the strategy.	No change

Additional comments

- 2.13 When asked if they felt whether anything was missing from the Bury Biodiversity Strategy that should be included, respondents suggested the following gaps:

Summary of comment	Response	Change required
Stop development of PfE allocation JPA7 Elton Reservoir as this is where the biodiversity is.	The Places for Everyone Plan was found sound following an independent examination which considered all ecological evidence for the Elton Reservoir site. The Plan was subsequently adopted by full Council with effect from 21 March 2024.	No change
Have a dedicated resource/set a minimum level of resource.	Resourcing will be considered through the implementation of the strategy.	No change
It would be helpful to have additional links on how people could help. A link to a map of the Borough showing the various habitats.	Noted	The end of the document now includes links to several helpful resources.

<p>The reference to "providing nesting places for swifts and swallows or roosts for bats" in paragraph 3.10 is welcome but this is very vague at present about when, where and how these are to be provided.</p>	<p>The Council resolved to require best practice standards for inclusion of swift boxes in the New Bury Local Plan in July 2024 and ensure that any plans to re-roof the Councils Housing Stock is seen as an opportunity to install swift bricks.</p>	<p>Chapter 2 has been amended to incorporate the role that buildings play in the borough for nesting</p>
<p>The universal Swift brick houses several red listed small bird species and should be installed in all new developments in accordance with best practice guidance.</p>	<p>The Council resolved to require best practice standards for inclusion of swift boxes in the New Bury Local Plan in July 2024 and ensure that any plans to re-roof the Councils Housing Stock is seen as an opportunity to install swift bricks.</p>	<p>Chapter 2 has been amended to incorporate the role that buildings play in the borough for nesting</p>
<p>Encouraging more conservation groups and the participation of the residents would be valued</p>	<p>In table 1 of the strategy, an action to support local communities in acquiring and spreading understanding is proposed. Specific measures to deliver this action will be developed through the implementation of the strategy.</p>	<p>No change</p>
<p>Reference the RSPB Swift Mapper website (https://www.swiftmapper.org.uk/)</p>	<p>Noted</p>	<p>The end of the document now includes links to several helpful resources.</p>
<p>"1, Surveys need take account of migratory species , such as swifts, and be undertaken at the right time of year to capture such species. Buildings specifically need to be recognised as habitats "</p>	<p>Ecological surveys are undertaken in specific seasons. Chapter 2 has been amended to incorporate the role that buildings play in</p>	<p>Chapter 2 has been amended to incorporate the role that buildings play in the borough for nesting</p>

	the borough for nesting.	
Seek support and help from organisations such as the RSPB. They do great work with farmers and other landowners.	Specific measures will be developed through the implementation of the strategy.	No change
Community projects such as 'fit a nest box' week, where householders are encouraged, maybe offered, a free nest box to fit to their houses.	Specific measures will be developed through the implementation of the strategy.	Chapter 2 has been amended to incorporate the role that buildings play in the borough for nesting
Make reference to microplastic and litter. This pollution has vast impacts on biodiversity of soil, plants, pollinators, and the health of all animals, including humans.	Specific measures will be developed through the implementation of the strategy.	No change
Priority Habitats, Priority Species, Biodiversity Opportunity Areas	A change has been made in Chapter 2 to refer to Priority habitats. Priority species are referred to in Chapter 2.	A change has been made in Chapter 2 to refer to Priority habitats. Priority species are referred to in Chapter 2.

2.14 When asked for any other comments, respondents provided the following:

Summary of comment	Response	Change required
Welcomes the consultation and acknowledgement that protecting and managing our green spaces better, increasing biodiversity and acknowledging that it is an important part of becoming carbon neutral. We are in a climate and environmental emergency.	Support noted	No change
I am glad to see the council taking action.	Support noted	No change

Swift bricks should be installed in all new developments.	The Council resolved to require best practice standards for inclusion of swift boxes in the New Bury Local Plan in July 2024 and ensure that any plans to re-roof the Councils Housing Stock is seen as an opportunity to install swift bricks.	Chapter 2 has been amended to incorporate the role that buildings play in the borough for nesting
A good step forward, but please utilise the experienced conservation groups to help.	Support noted	No change
I am impressed that it gives such a comprehensive overview.	Support noted	No change
Stop development of green land and PfE allocation JPA7 Elton Reservoir as this is where the biodiversity is.	The Places for Everyone Plan was found sound following an independent examination which considered all ecological evidence for the Elton Reservoir site. The Plan was subsequently adopted by full Council with effect from 21 March 2024.	No change
Waste of council tax money & Council ignore local people.	This consultation is to hear the views of local people. The strategy has been funded using a grant from DEFRA, not council tax.	No change
Annual Reports that quantify the diversity in the borough and losses/gains, then residents can see where they can help in turning around declining stories.	Specific measures will be developed through the implementation of the strategy.	No change
Should be part of the school curriculum and primary, secondary and tertiary level.	Specific measures will be developed through the implementation of the strategy.	No change

<p>Overall I am very pleased to see the Borough recognising the value and need for a Biodiversity Strategy, However, it is the detail of the actions and who and when they will be done along with a commitment to funding that will in the end make any major changes.</p>	<p>Support noted. Specific measures will be developed through the implementation of the strategy.</p>	<p>No change</p>
<p>More public education is needed to leave these plants where they are to prevent biodiversity decline. That a little bit of scruffiness is great for nature. Adopting Plantlife's No Mow May and publicising it would be fantastic.</p>	<p>In table 1 of the strategy, an action to support local communities in acquiring and spreading understanding is proposed. Specific measures to deliver this action will be developed through the implementation of the strategy.</p>	<p>No change</p>
<p>There is also a mental health impact on people, who will end up in a vicious cycle of being depressed/anxious due to being surrounded by pollution, and losing their willingness to engage with any initiatives to improve that scenario; people stop caring and it becomes harder and harder for the authorities to rein in negative attitudes and promote such strategies, especially when they are struggling with their own health and finances.</p>	<p>The foreword makes reference to the importance of the natural environment for mental health.</p>	<p>No change</p>
<p>Waste of time.</p>	<p>This is the Council's first ever Biodiversity Strategy and is the first step toward implementing our Biodiversity Objectives and Actions.</p>	<p>No change</p>

3. Schedule of amendments to draft strategy

- 3.1. Please refer to the table below which details the amendments to the Biodiversity Strategy.
- 3.2. Proposed new text is shown as blue underlined text whilst deletions are shown as struck out.

Location	Change
cover	Use a single image, perhaps of the woodpeckers, instead of 6 small ones
1.8	<p>Amend paragraph 1.8 as follows:</p> <p>The Greater Manchester Five-Year Environment Plan (2019-2024)⁴ identifies 5 priorities for the natural environment: Managing land sustainably, managing our water sustainably, achieving a net gain in biodiversity from new development, increasing investment in our natural environment and increasing our engagement with our natural environment. <u>The Greater Manchester Combined Authority is charged with producing a Local Nature Recovery Strategy for the city region and a draft is expected in Autumn 2024. The GMCA</u> Greater Manchester Combined Authority has also produced Biodiversity Net Gain Guidance for Greater Manchester⁵ and published an Off-site Net Gain Scoping Study in 2021.</p>
Map on Page 7	Updated Map to GM Landscape Character Types
After 2.10	Add numbering to paragraph and update subsequent numbers
2.11	<p>Amend text as follows:</p> <p>The biodiversity interest of the Borough is recognised in various site designations which receive some protection from policies in the Unitary Development Plan. Bury has:</p> <ul style="list-style-type: none"> • 2 Sites of Special Scientific Interest • 49 Sites of Biological Importance • 13 ancient woodlands • 7 local nature reserves • <u>6</u> A number of protected species <u>such as</u> (badger, otter, barn owl, kingfisher, great crested newt, black necked grebe) plus several bat species and winter visitors. • c112 km of wildlife links and corridors
Following new 2.11	<p>Add paragraph 2.12 as follows:</p> <p><u>2.11</u> In the animal world the arrival of Canada geese, grey squirrel, mink and signal crayfish have affected indigenous communities. Then there are diseases to contend with, such as ash die-back, chestnut canker and acute oak decline.</p>

	<p>2.12 Buildings also play a role in providing habitats and maintaining biodiversity in the borough. Several species such as bats, swifts, swallows, house martins and starlings use buildings for nesting.</p>
After 2.18	<p>Add new Paragraph as follows:</p> <p>2.19 Natural England also keeps a record of Priority Habitats across the region. The maps are updated bi-annually so to see the current habitats' in Bury, please visit the Priority Habitat Inventory on data.gov.uk.</p>
3.6	<p>Amend draft paragraph 3.6 as follows:</p> <p>3.6 Although most people are well disposed towards the natural environment, people aren't always aware of the biodiversity that exists, how it functions and how it can be harmed. Some will welcome the opportunity or encouragement to get actively involved in improving biodiversity through initiatives such as 'No Mow May', installing nesting boxes in their gardens or creating hedgehog highways</p>
After 3.10	<p>Add paragraph as follows:</p> <p>In July 2024, the Council resolved to require best practice standards for inclusion of swift boxes in the new Bury Local Plan and ensure that any plans to re-roof the Council's housing stock is seen as an opportunity to install swift bricks.</p>
3.11	<p>Amend draft paragraph 3.11 as follows:</p> <p>3.11 The 2021 Environment Act places d a new duty on Local Planning Authorities to require a 10% increase in biodiversity value from new development requiring planning permission.</p>
3.12	<p>Delete paragraph 3.12 as follows:</p> <p>3.12 The Draft Places for Everyone Plan includes a policy requiring Biodiversity Net Gain.</p>
3.13	<p>Amend draft paragraph 3.13 as follows:</p> <p>3.13 Biodiversity Net Gain is due to become became mandatory in two steps on 12 February and 2 April 2024 January 2024 and we, with partners such as Bury Council and the Greater Manchester Ecology Unit, will begin monitoring and reporting on what is done to achieve biodiversity net gain, be it on or off development sites. The first report will be published before 2026.</p>
3.15	<p>Amend draft paragraph 3.15 as follows:</p> <p>The Council has commissioned the Greater Manchester</p>

	Environment Trust (GMET) to prepare costed habitat improvement and management plans for seven of these Council-owned potential BNG sites: at Old Kays, Brandlesholme, Chesham Woods, Hollins, Springwater Park, Outwood and Philips Park. The GMET is a partnership between the Greater Manchester Combined Authority and the Wildlife Trust for Lancs, Greater Manchester and North Merseyside, which exists to bring together public, private and third sector bodies, communities and funders to address environmental issues.
4.2	Amend draft paragraph 4.2 as follows: Delivering these objectives will require policies and actions. We propose to carry through the policies for biodiversity contained in the Unitary Development Plan (see Appendix for detail) and update them for inclusion in the forthcoming Local Plan. Strategic policies are included in the Places for Everyone Strategy. Local Plan policies will build on the GM policies and those in the previous Unitary Development Plan, which are listed in the Appendix.
<i>Table 2</i> Implement mandatory BNG.	Change target date as follows: January April 2024.
<i>Table 2</i> Adoption of Places for Everyone.	Change target date as follows: 2023-2024.
<i>Table 2</i> Implement updated planning policies through the development management process.	Add measure: Use of Places for Everyone policies in planning decisions. Change target date as follows: 2024-2026
<i>Table 2</i> Establish monitoring system for delivery of net gain agreements on offset sites in Bury defined	Amend Action as follows: Establish monitoring system for delivery of net gain agreements on offset sites in Bury defined off-site biodiversity gain. Amend measure as follows: Monitoring framework established for Biodiversity Net Gain sites
<i>Table 3</i> Deliver BNG	Insert Lead: Bury Council/GMET/GMEU

on Council-owned sites.	
<i>Table 3</i> Support naturalisation of watercourses	Amend Lead as follows: Landowners/Bury Council/ Irwell Catchment Partnership .
<i>Table 3 insert additional action</i>	Insert new Action as follows: The Council will expect relevant proposed developments to incorporate nesting or roosting opportunities for birds and bats. Lead: GMEU/Bury Council Measure: Number of developments with bat or bird boxes. Target date: From 2024
5.1	Un-bold text
5.2 (and sentence on p16)	Change start of paragraph to 'Following the mandatory introduction of biodiversity net gain in 2024 and the adoption' Amend draft paragraph 5.2 as follows: 5.2 Following the mandatory introduction of biodiversity net gain in November 2023 2024 and the adoption of Bury Biodiversity Strategy, we will also produce, no later than 1 January 2026, a report on how the Council is meeting its biodiversity duty. This report will be updated at least every 5 years. Remove blue text at bottom of page 16.
6.4	Amend paragraph 6.4 as follows: The second major element of the Environment Act is Biodiversity Net Gain. From January 2024 a All qualifying development requiring permission now has to achieve a minimum of 10% net gain in biodiversity. This requirement will be became applicable to all major developments developments except small sites in January 2024 in February 2024 and small sites in April 2024 .
6.5	Amend paragraph as follows: 6.5 This will provides a legal requirement that any impact on biodiversity caused by development initiatives, where it cannot be avoided, will not only be compensated but will have to demonstrate a 10% biodiversity net gain.
6.8	Amend paragraph as follows: 6.8 Once adopted, The Greater Manchester 'Places for Everyone' Joint DPD will was adopted in March 2024 and forms an integral part of Bury's wider development plan. The Plan is will

	<p>be a key tool in meeting Greater Manchester's ambition to become carbon neutral by 2038 and will work in tandem with the Five-Year Environment Plan 2019-2024 produced by the Greater Manchester Combined Authority (GMCA).</p>
6.9	<p>Amend paragraph 6.9 as follows:</p> <p>6.9 The Places for Everyone (PfE) joint development plan document has an overall aim of achieving a major net enhancement of biodiversity value across the region, Greater Manchester. In order to achieve this each new development will deliver a "net gain in biodiversity".</p>
6.10	<p>Amend paragraph 6.10 as follows:</p> <p>6.10 Draft Policy JP-G8 JP-G9, as proposed to be modified in October 2023, states the following:</p>
Page 20 Policy JP-G9 extract	<p>Amend as follows:</p> <p>Policy JP-G9 JP-G8 A Net Enhancement of Biodiversity and Geodiversity Through local planning and associated activities a net enhancement of biodiversity resources will be sought, including, where relevant, by:</p> <ol style="list-style-type: none"> 1. Increasing the quality, quantity, extent and diversity of habitats, particularly priority habitats identified in national or local biodiversity action plans and those that support priority species; 2. Improving connections between habitats, to protect and enhance the provision of corridors, ecological networks (including Nature Recovery Networks) and stepping stones that enable the movement of species, especially as the climate changes; 3. Enhancing the management of existing habitats, including through habitat restoration, avoiding habitat fragmentation and combating invasive species; 4. Protecting sites designated for their nature conservation and/or geological importance, with the highest level of protection given to international and then national designations; 5. Facilitating greater access to nature, particularly within urban areas; 6. Supporting the development and implementation of the Great Manchester Wetlands Nature Recovery Network; and 7. Safeguarding, restoring and sustainably managing our most valuable soil resources, tackling soil degradation/erosion and recovering soil fertility, particularly to ensure protection of peat-based soils and safeguard 'best and most versatile' agricultural land. <p>Development will be expected to:</p> <ol style="list-style-type: none"> a) Follow the mitigation hierarchy of: <ol style="list-style-type: none"> i. Avoiding significant harm to biodiversity, particularly where it is irreplaceable, through consideration of alternative sites with less harmful impacts, then ii. Adequately mitigating any harm to biodiversity, then

	<p>iii. Adequately compensating for any remaining harm to biodiversity</p> <p>b) Avoid fragmenting or severing connectivity between habitats;</p> <p>c) Achieve a measurable net gain in biodiversity of no less than 10%</p> <p>d) Make appropriate provision for long-term management of habitats and geological features connected to the development;</p> <p>e) Where appropriate, development should: mitigate air pollution impacts on Manchester Mosses SAC; mitigate urban edge, functionally linked land and recreation disturbance impacts on the South Pennine Moors SAC/SPAs; and assess and potentially mitigate boat movement, water pollution, and light spillage and shading impacts on the Rochdale Canal SAC; and</p> <p>f) Development proposals should be informed by the findings and recommendations of the appropriate biodiversity/ecological assessment(s) in the PfE evidence base and/or any updated or appropriate biodiversity/ecological assessments submitted as part of the planning application process.</p>
6.16	<p>Amend paragraph as follows:</p> <p>Over the coming months, we will be involved in the early stages of the LNRS' production, which will include evidence gathering, stakeholder engagement, and workshops to agree core nature recovery areas, opportunity areas, and mapping methods. It is expected that a draft LNRS for Greater Manchester will be published for public consultation in Summer Autumn 2024.</p>
6.20	<p>Amend paragraph as follows:</p> <p>6.20 Whereas PfE will deals deals with strategic planning matters that are of significance across the Joint Plan area (such as identifying future levels of housing and employment growth), Bury's Local Plan will contain a range of locally-specific planning policies and identify local sites where development should be built as well as areas where development should be restricted or controlled.</p>
Above 6.24	<p>The heading 'Bury Climate Action Strategy and Plan' should be in the same font as Bury Development Plan.</p>
6.25	<p>Amend as follows:</p> <p>6.25 The action plan (20242024)¹⁴ sets out actions for the natural environment that the council can participate and lead on including but not limited to:</p>
End of document	<p>Add text as follows:</p> <p>Inspired to take action?</p>

For more information, why not visit the links below to find out how you can help biodiversity.

- Your garden, balcony or yard, no matter how big or small, has the potential to be a haven for wildlife. Visit Lancashire Wildlife Trust's website for some tips on how to get started: <https://www.lancswt.org.uk/my-wild-garden>
- Every action counts. GM Green City have a wide range of resources to help: <https://gmgreencity.com/interests/natural-environment/>
- Want to encourage more birds in your area? RSPB have lots of handy tips for supporting wildlife on their website: <https://www.rspb.org.uk/helping-nature/what-we-do>

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