

IN28 Further Supplementary Questions about GMCA responses to action points relating to ecology evidence:

Following the hearing sessions relating to some of the site allocations, we published action point 91 asking GMCA to advise what they consider to be relevant, up-to-date, adequate and proportionate evidence on ecology to inform the choice of allocations and the contents of site allocation policies in the Plan. The GMCA response was published on 3 February 2023. Question: .Does the information referred to in the GMCA response to action point 91, including Preliminary Ecological Appraisals based on Greater Manchester Ecology Unit data and knowledge, represent relevant, up-to-date, adequate and proportionate evidence on ecology to inform the choice of allocations and the contents of the site allocation policies in the Plan?

We respond regarding Northern Gateway JPA1.1 JPA1.2 and the failure to conduct thorough and independent ecological assessments. There are numerous key habitats on the site, including wetlands, woodland, grassland, which will be damaged or lost as a result of this scheme. It will negatively impact protected species, including Great Crested Newts (GCN), and wider ecological networks - none adequately considered in the plan. The issue of the large peat body is not properly addressed.

For Rochdale the GMEU completed a PEA, and despite knowing that a large cluster of Great Crested Newt ponds straddles the border with Bury, they made no reference to that protected species - no requirement for amphibian surveys of what will be one of the county's largest populations. This is clearly a PEA which is not fit for purpose as evidence and justification making the allocation UNSOUND.

In June 2020 in JPA1.1 a partial Phase 1 Habitat Survey was conducted but this only covered 50% of the site, the remainder had a "High-level Walkover". In JPA1.2 a "High-level Walkover" was conducted - a google search reveals no results of what this actually is. All the authors and signatories are CIEEM members but its methods were not used. The reports from WYG both state that the reports remain valid for 18 months till December 2021. There is no further review - expired documents provide neither evidence or justification: UNSOUND.

We heard explain there are records of GCN in around 20 ponds - mainly these are his records from 18 to 30 years ago. The submission of such reference as the sole reference is UNSOUND. The GMEU argue that data should be no less than 3 years old - no oversight from the body tasked by GMCA to provide oversight. The GMEU have not declared an SBI over these ponds suggesting a failure of systems at GMEU. We remind Inspectors that the pond cluster was recognised by GMEU for AGMA (now GMCA) as a Biodiversity Opportunity Area for GCN.

The WYG visits and data searches revealed more Priority Species which warrant conservation. They have provided no botany lists to enable testing for Priority Habitats. They give long lists of species and habitats which need to be surveyed for, but only once the allocations are confirmed, which is UNSOUND.

We draw your attention to the coloured map shown Inspectors at the hearing by the Northern Gateway representative which showed every bit of JPA1.1 with warehouses on it. He was

dangerously firm: “There is nothing of any value and nothing to offset for biodiversity”. He has not been provided with adequate information making the allocation UNSOUND.

YWG reported the presence of Smooth Catsear *Hypocharis glabra* JPA1.1 of which there are no records in GM – Red Data Vulnerable according to BSBI and UKJNCC. The flower listed without comment, showing surveyor inexperience, the report signed off by YWG managers unchecked - the GMEU giving no oversight. There can be no confidence in this work being evidence and justification: UNSOUND.

Word Count 499