

Date: 10 February 2023  
Our ref: 410599  
Your ref: Places for Everyone Examination



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**BY EMAIL ONLY**

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Dear Sir/Madam,

## **Natural England does not support development on peat**

### **Places for Everyone Examination – Policy JP Allocation 28 North of Irlam Station, Policy JB Allocation 29 Port Salford Extension (Matter 21) and Policy JB Allocation 33 New Carrington (Matter 23)**

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

On 1 October 2021 Natural England submitted a formal consultation response to the Submission version of the Places for Everyone (Pfe) Joint Development Document. As part of our response, we raised concerns relating to development on peat, which although could not formally be considered matters of soundness and legal compliance, were areas that Natural England considered in need of improvement.

Natural England have taken the decision not to attend Matter 21 and 23 Hearing sessions in person since there has not yet been an official change to national policy provision for protecting peat from development and therefore, no material change in circumstance. However, based on our ongoing work and discussions with Defra on this matter, Natural England will be proposing a change to policy as part of our formal consultation response to national planning policy reforms. We wish to take the opportunity to bring this to the Inspectors attention as part of the Examination process.

The strategic allocation policies of concern are as follows:

- Policy JB Allocation 33 New Carrington (Matter 23) - 4,300 dwellings and 350,000 sqm of employment floorspace proposed on approximately **445ha of deep peat**.

This is the largest allocation on deep peat in the Plan and yet there is no reference to the risk in the policy wording, only in the supporting text.

- Policy JP Allocation 28 – North of Irlam Station (Matter 21) – 800 dwellings and associated social and community uses proposed on approximately **30 ha of deep peat**.

The policy states that development will be required to *Minimise the loss of the carbon storage function of the peat and undertake a hydrological assessment in order to avoid any adverse impacts on the hydrology of Chat Moss, whilst ensuring that there is no potential for future problems of land stability or subsidence;*

Policy JP Allocation 29 – Port Salford Extension (Matter 21) –320,000 sqm of employment floorspace proposed on approximately **102ha of deep peat**.

The policy states that development will be required to *Minimise the loss of the carbon storage function of the peat and avoid any adverse impacts on the hydrology of surrounding areas of peat/mossland, whilst ensuring that there is no potential for future problems of land stability or subsidence;*

Natural England would argue that the nature of developing on peat will, not only prevent future restoration, but will cause irreversible damage to the body of peat directly under the developed land and the wider peat mass, which depends on the continuity of the flow of water. The degradation of the peat mass will result in significant greenhouse gas emissions.

The three allocations of concern are located within the Great Manchester Wetlands [Nature Improvement Area](#) which aims to restore a nature recovery network of wildlife sites and corridors which will allow wetland species to survive and thrive in the face of increasing environmental pressures such as climate change.

It is also worth noting that habitats present on deep peat can fall within the definition of the Habitats Directive Annex I priority habitat '*Degraded raised bog still capable of natural regeneration*' which a planning authority has a duty to have regard to conserving under Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006.

Natural England also wish to highlight that allocations 28, 29 and 33 do not align with the following strategic policies within PfE:

**Policy JP – J9 - A Net Enhancement of Biodiversity and Geodiversity**

*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.*

**Policy JP- G4 Lowland Wetlands and Mosslands**

- 1. Maintain and enhance the extensive and varied mosaic of semi-natural habitats including brooks, ditches, open water bodies, bog, fen, swamp, flashes, ponds, wet and broadleaved woodland, and grassland;*
- 2. Manage and restore the remnant pockets of lowland raised bog, including through restoration from farmland, significantly expanding and connecting the areas of active bog to contribute to important functions such as flood risk management and carbon sequestration;*
- 3. Positively manage land adjacent to lowland raised bog and other sensitive wetland habitats in a complementary and coordinated manner, ensuring that their hydrology is not adversely affected and the water table is restored;*

**Policy JP – S2 Carbon and Energy**

- 6. Increasing the range of nature based solutions including carbon sequestration through the restoration of peat-based habitats, woodland management, tree-planting and natural flood management techniques;*

In addition, Natural England are of the opinion that allocations 28 & 29 are not consistent with local planning policies set out in the adopted [Salford Local Plan](#): Development Management Policies and Designations':

Annex D shows the Saved Unitary Development Plan policies which ensures [Policy EN11 Mosslands](#) remains applicable.

**Policy EN11 - Mosslands**

- B. development that would affect land which has the potential to be restored to lowland raised bog habitat will be permitted:*

b. elsewhere in the mosslands only where:

- i. the development would not prevent that restoration in the future; or
- ii. provision is made as part of the development for the restoration of an area of lowland raised bog habitat elsewhere in the mosslands, equivalent to that potential area lost as a result of the development; or
- iii. the development secures major nature conservation benefits for the mosslands if it has been clearly demonstrated that either restoration pursuant to (ii) is not practically feasible or the major conservation benefits outweigh the benefits that would arise from restoration pursuant to (ii);

### **Policy G12 – Chat Moss**

Figure 18 Biodiversity Assets illustrates that allocation 28 & 29 appear to fall within the Chat Moss policy boundary. The policy is clear *that Any development within or near to Chat Moss shall be consistent with these priorities (outlined in the policy) and shall ensure that the capacity of the hydrology of the area to support bog restoration is not adversely affected.*

### **Policy CC1 – Climate Change**

*Maximising carbon storage and sequestration, including by:*

9) *Protecting, managing and where appropriate supporting the provision or restoration of habitats that provide a carbon storage function, such as lowland raised bog in Chat Moss (in accordance with policies G11, G12 and BG2) ...*

11) *Minimising degradation and erosion of soil (in accordance with policy GB2)*

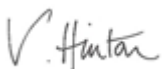
Furthermore, the Greater Manchester Combined Authority (GMCA) has declared a climate emergency and identified that urgent action is needed to put Greater Manchester on a path to carbon neutrality by 2038. The Government's 25 Year Environment Plan set out ambitions to create and deliver a framework for peat restoration in England and the subsequent England Peat Action Plan was created. This Plan recognised the importance of peat to meet wider environmental goals. They identified that peatlands are our biggest terrestrial carbon store and home to some of our rarest species. The England Peat Action Plan sets out government ambitions of responsibly managing, restoring and maintaining/restoring hydrological condition of all peatlands. Peat provides a range of other valuable benefits including biodiversity rich ecosystems, improved water quality and natural flood management, and is key to delivering a Nature Recovery Network in Greater Manchester.

In light of the information highlighted in this letter, Natural England advise that the allocations in question do not reflect sustainable development and will result in irreversible environmental impacts that we do not consider possible to mitigate.

We hope you find this information useful and that due consideration will be given to the matters raised in the Examination process.

For any queries relating to the specific advice in this letter please do not hesitate to contact me, please send your correspondence to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk) marked for my attention.

Yours faithfully



Ginny Hinton  
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