

Places for Everyone Joint Development Plan Document

Statement of Common Ground between Tameside Council, Natural England and the Landowners

Policy JP Allocation 30 – Ashton Moss West

April 2023

1. Purpose

- 1.1. This Statement of Common Ground (SoCG) has been jointly prepared by Tameside Metropolitan Borough Council (TMBC) on behalf of the GMCA, Natural England and the two promoting parties for the proposed Ashton Moss West allocation (JPA30). It is in response to the Inspectors' Action Point – AP135, in Places for Everyone (PfE) Examination Document IN34.
- 1.2. The allocation is in multiple ownerships. However, for the purposes of this SoCG only two of the landowners are considered to be site promoters: Cordingleys on behalf of Staley Developments Ltd and Cushman & Wakefield on behalf of Arqiva¹.
- 1.3. This SoCG is intended to bring the Inspectors up to date on areas of agreement and disagreement between the relevant parties in relation to peat; namely the **extent** of the peat on the site, the **quality** of the peat, the potential for **restoration**, and the likelihood of this being achieved.

2. Background

- 2.1 The proposed JPA30 Ashton Moss West allocation is a 58.23 hectare site that sits between the urban areas of Ashton-under-Lyne and Droylsden. Just under 95% of the entire site (55.16 hectares) is located within the Ashton Moss (the moss) deep peaty soils area identified by Natural England/Defra.
- 2.2 The moss would historically have been much larger and is believed to have begun formation around 5000BC covering a much wider area than today, but due to exploitation and later reclamation, the known extent of the moss has significantly contracted since. Its original extent, as indicated on the map at **Appendix A**, is therefore long lost².
- 2.3 In the medieval period details for reclamation and exploitation are limited. However, peat digging for use as fuel (Turbary rights), in addition to some clearance and piecemeal enclosure did take place. However, it is post 1066 when the moss experienced change that is more significant.
- 2.4 The post-medieval period marked a time of substantial intensification of reclamation. During this period, the moss was sub-divided into rooms or allotments that were tenanted, with extensive drainage systems installed to facilitate its use. By 1700, the moss boundaries had shrunk to under half its

¹ PfE examination document [GMCA1.8](#) SoCG with landowners pages 1-3.

² PfE examination document [10.08.02](#) Historic Environment Assessment pages 12-16.

extent in the 1400. Around the mid-18th century the core of the moss (which contains the proposed allocation) remained as common land, with continued use for grazing and peat cutting.

- 2.5 The industrial to modern period saw the aforementioned common land area of the moss further compromised, being reclaimed for arable farming and becoming the chief local area for market gardening during the mid-19th century up until the 1990s, being identified for the large part as Grade 2 agricultural land.
- 2.6 In addition, this period also saw the construction of the rail line to the north of the site (opened in 1846), construction of the M60 motorway to the east (opened 2000), residential development to the west and commercial and metrolink developments to the south.
- 2.7 In addition, spoil arising from the construction of the M60 and employment development, which took place to the south, was placed across much of the site to significant depths. Only a small parcel of land around Moss Farm to the site's north and the area of the transmitters to the west are free from this.
- 2.8 Therefore, since the medieval period the scale, condition and quality of the peat deposits within the site have been significantly compromised. The peat has been cut, the land reclaimed and hydrology altered through drainage for agricultural uses and cutting of the motorway, adjacent development occurring for a variety of uses severing connections with wider tracts of land and finally the placement of a significant volume of spoil material.

3.0 Extent of Peat on the Site

GMCA and Site Promotor position

Natural England Deep Peaty Soil Data

- 3.1 The proposed JPA30 Ashton Moss West allocation is a 58.23 hectare site that is largely (95% or 55.16 hectares) located within the Ashton Moss area classified by Natural England/Defra as a location of 'deep peaty soils'. The data underlying the Natural England 'Peaty Soils Location (England)' layer was produced by Natural England during June to October 2008, with the aim of identifying the extent of peaty soils for the purposes of the Partnership Project to Protect and Enhance Peat Soils. The data / layer was subsequently published on 9 July 2021. The map at **Appendix B** shows the extent of the peaty soils area as suggested by the Natural England data.

Investigations undertaken on behalf of Tameside Metropolitan Borough Council

- 3.2 The council, prior to the publication of the above data, was already aware of the potential for the presence of peat deposits, and investigations undertaken on behalf of Tameside Metropolitan Borough Council in 2018, as referenced

within the site allocation topic paper³ and available for comment at the regulation 19 publication stage, formed part of the examination library.

- 3.3 Principally, they are a Preliminary Geotechnical Report⁴ and a Factual Report on Ground Investigation⁵ commissioned of Ove Arup with primary research undertaken by Ian Farmer Associates. In addition, as drawn upon within section 2, the Historic Environment Assessment [[10.08.02](#)] prepared by the University of Salford, details the origins and decline of the original peat moss through successive waves of reclamation and exploitation. The Historic Environment Assessment was also available at the publication stage.
- 3.4 The published geotechnical evidence relates to the findings from primary investigations carried out between 3rd and 18th March 2018 and comprised 11 cable percussive boreholes and 5 dynamic sampler boreholes. In addition, previous ground investigations, including that prepared by Mouchel to support the construction of the M60 motorway, were reviewed. The studies not only sought to ascertain the composition of the underlying geology but also that of the placed material that occurred during construction of the M60 motorway.
- 3.5 The findings from these boreholes identified that underlying the made ground, natural peat was encountered in the majority of the exploratory locations. However, peat was absent along the southern boundary adjacent to Lord Sheldon Way and toward Moss Side farm. The peat layer was observed as generally extending to a thickness of between 1.2 and 2.5m, but reached an estimated maximum depth of 6m in the south of the site.
- 3.6 This range of peat depth identified by Arup broadly correlated with the two historical ground investigations reviewed in The Preliminary Geotechnical Report ([10.08.04](#)) namely the:
- British Geological Survey records from 1981 indicate 1.9 to 4.7m of peat, overlaying stiff clay; and
 - Mouchel ground investigation carried out prior to the construction of the M60. This included approximately 60 boreholes and trial pits. Mouchel described the site being underlain by between 1.5 and 7m of peat over a thin layer of alluvium over stiff glacial till.
- 3.7 As set out within the evidence, it is estimated that the extent of underlying peat therefore covers 96% of the envisaged net developable area to a depth generally ranging from 1.2 to 2.5m, but with a maximum depth estimated to be 6m (**Appendix C**).
- 3.8 Overall the analysis carried out on behalf of Tameside Metropolitan Borough Council in 2018 provides a more detailed, site specific and up to date assessment than the 2008 exercise undertaken by Natural England/Defra, which is broad scale and not reflective of current site specific realities.

³ PfE examination document [10.08.11](#) Ashton Moss West Topic Paper pages 22-24.

⁴ PfE examination document [10.08.04](#)

⁵ PfE examination document [10.08.03](#)

Natural England Position

- 3.9 Natural England accept the findings of the most recent evidence as summarised at paragraph 3.7.

4.0 Quality of the Peat

GMCA and Site Promotor position

- 4.1 There is very limited site-specific information from Natural England/Defra with regard to the quality of the peat at Ashton Moss West or the broader historical Ashton Moss area. The only data provided to the Council is that shown on the deep peaty soils' layer based on 2008 data and published in 2021.
- 4.2 However, much of the envisaged developable area of the site is overlain with a significant layer of placed material. The material is spoil arising from the construction of the M60 and employment development, which took place to the south. It is placed across much of the site to significant depths, with only a small parcel of land around Moss Farm to the site's north and the area of the transmitters to the west free from this as shown at **Appendix D** and **Appendix E**.
- 4.3 Therefore only a small area of exposed peat exists to the west of the site which is drained, experiences oxidation and therefore emits carbon dioxide and is in a degraded condition.
- 4.4 The aforementioned Preliminary Geotechnical Report⁶ and a Factual Report on Ground Investigation⁷ identify the placed material ranges in thickness from 7 to 18m at its deepest point, effectively burying the underlying peat deposits.
- 4.5 In addition, the Preliminary Geotechnical Report (Section 7.2.1) also identified a number of potential sources of contamination, summarised as follows:
1. Made Ground:
 - a. Asbestos;
 - b. Metals;
 - c. Ground Gases (methane and carbon dioxide);
 - d. Petroleum hydrocarbons;
 - e. Polyaromatic hydrocarbons (PAHs).
 2. Peat - Ground gas
 3. Upper Coal Measures – Ground gases (methane, carbon dioxide)
 4. Offsite sources: railway:
 - a. Heavy metals
 - b. Petroleum hydrocarbons; and
 - c. Polyaromatic hydrocarbons (PAHs).

⁶ PfE examination document [10.08.04](#)

⁷ PfE examination document [10.08.03](#)

- 4.6 Notwithstanding the significant volume of placed material upon the peat, the general contraction of the broader moss, as set out within section two has been substantial. The result of which is an isolated parcel that has effectively been enclosed by development and had material placed upon it.
- 4.7 Further to this, and whilst further investigation is likely needed, the historical uses of the land indicate a significant compromise and degradation to the quality of the underlying peat deposits over many years.

Agricultural Land Classification

- 4.8 This degradation is particularly evident within an updated agricultural land classification assessment, carried out by Walker Sime in August 2022⁸. This document was submitted to the PfE Examination Library by the site promoters on 24 February 2023 and concluded that most of the site is now either Grade 3b (87%) or Grade 4 (13%).
- 4.9 This is comparative to historical identification, which did not take into account the number of changes that have subsequently altered the agricultural land classification, including the placement of material, by Natural England/Defra as being of between grade 2 and 3, as shown in **Appendix F**.

Natural England Position

- 4.10 Natural England accept that the peat is significantly degraded due to the vast quantities of spoil material deposited on top of the peat.

5.0 Potential for Restoration and Likelihood of this Being Achieved

GMCA and Site Promotor position

Potential for Restoration

- 5.1 Based on the evidence above it is clear that the original moss has contracted to a significantly smaller area than originally existed. Much of the surrounding deep peaty soil identified by the Natural England mapping has been developed or removed to facilitate development (such as the M60).
- 5.2 All but a small area of peat (5.5ha or 13% of the envisaged net developable area) within the site is buried under a significant volume of imported placed material. Any potential for restoration or rewetting would therefore need to remove this overburden, which while technically feasible to remove such placed material, the cost and desirability of doing so are particularly prohibitive and there exist a range of other risks which make restoration beyond unlikely.
- 5.3 Further, the location of the site and contraction of the broader moss, including the development of adjacent infrastructure such as the motorway and rail line mean there is no wider peat area that restoration would or could connect to. In

⁸ PfE Examination Document [OD26](#)

essence, the site is an isolated pocket upon which there generally lies a significant quantity of placed material.

Likelihood of Restoration

- 5.4 As discussed above, the site is compromised by a number of factors. The most significant is the presence of the placed material that occupies the majority of the site and that is up to 18m thick at its greatest. In addition, the surrounding area that is indicated as being of deep peaty soils has largely been developed.
- 5.5 Taking the above factors into account it is considered that there are a number of actions which would consume significant resource and carry significant risk that would inhibit the likelihood of restoration taking place, which in summary are namely:
- Removal of the placed material covering the majority of the site, up to 18m thick
 - The cost of removing the placed material
 - Existing development surrounding the site on all sides, enclosing the peat with the lack of adjacent existing peat area to hydrologically connect to
 - The cutting of the M60 motorway acting as an effective hydrological drain
 - Raising the water table locally has the potential to increase groundwater flooding risks to adjacent built development
 - Degradation to the quality of peat that has occurred over several hundreds of years, through cutting, reclamation, agricultural use and drainage
 - No landowner desire or aspiration to use their land in such a way
 - Potential for contaminants to exist
- 5.6 Given all of the above, it is considered highly unlikely that the land that forms the site at Ashton Moss West will be restored or rewetted. That said, the policy does contain requirements to assist in mitigating impacts, particularly through the masterplanning process, minimising the carbon storage function of the peat and ensuring that a net gain for biodiversity is achieved.

Natural England Position

- 5.7 Natural England accept that this site is unsuitable for restoration due to the large quantities of spoil deposited on top of the peat.

6.0 Conclusion

GMCA and Site Promotor position

- 6.1 The GMCA recognise that the area is underlain with a layer of peaty soil and this has been confirmed through site investigation work conducted to support the plan making process.
- 6.2 However, the evidence clearly demonstrates that successive phases of remediation and exploitation have contracted both the scale and extent of the

broader moss. Further, the underlying peat which does exist is present primarily under a significant volume of placed material.

- 6.3 Notwithstanding a range of other factors, as set out above, compromising the quality of the underlying peat, the placement of material alone all but removes the potential of any likelihood for restoration.
- 6.4 Natural England did not raise concerns with the proposed allocation as they did with others (including allocation JPA28 North of Irlam Station, JPA29 Port Salford Extension and JPA33 New Carrington) through their regulation 19 consultation⁹ response or examination hearing submissions¹⁰.

Natural England Position

- 6.5 Natural England does not consider Ashton Moss West as a site suitable for restoration due to the vast quantities of spoil material deposited on top of the peat. Natural England advise that peat should be taken into account when considering the appropriate construction methodologies and geotechnical solutions to avoid further degradation to the peat mass below.

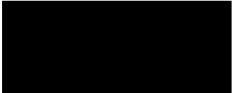
⁹ PfE consultation response <https://gmsf-consult.objective.co.uk/file/5966438>

¹⁰ PfE examination document [OD23](#)

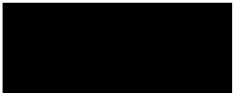
Signed for Tameside Metropolitan Borough Council on behalf of the nine PfE districts

Name: Julian Jackson
Position: Director of Place
Date: 28 April 2023
Signature: 

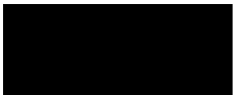
Signed for Cordingleys on behalf of Stayley Developments Ltd

Name: Andrew Newsam
Position: Director
Date: 26 April 2023
Signature: 

Signed for Cushman and Wakefield on behalf of Arquiva Ltd

Name: Claire Pegg
Position: Associate
Date: 26 April 2023
Signature: 

Signed for Natural England

Name: Ginny Hilton
Position: Area Manager
Date: 27 April 2023
Signature: 

Appendix A

Estimated extent of the Mossland¹¹

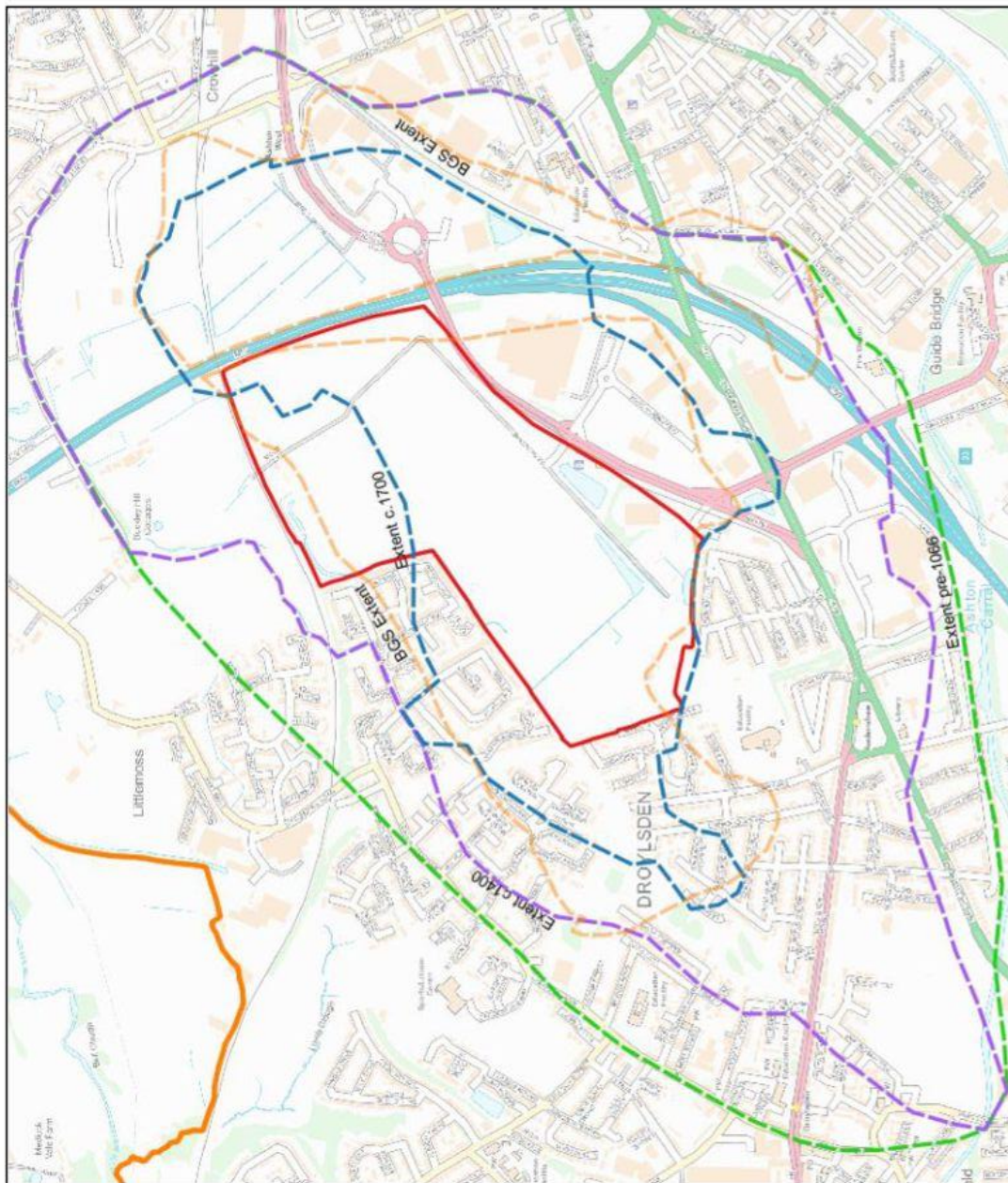


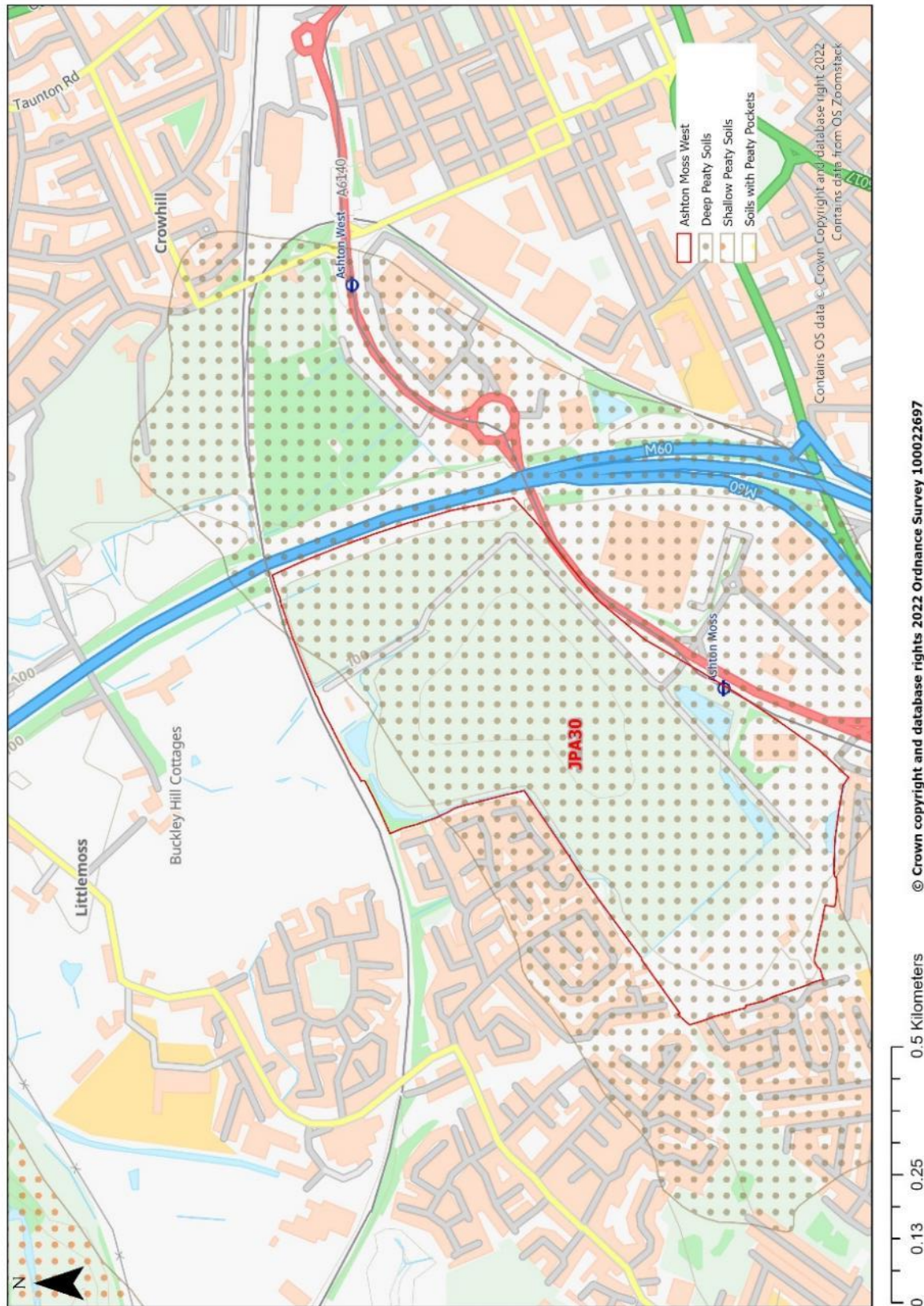
Plate 2 Estimated extent of the Mossland, from around 1066 to present day (based on British Geological Society data and Nevell 1992)

¹¹ PfE examination document [10.08.02](#) Historic Environment Assessment Page 12

Appendix B

Natural England Peaty Soils Location (England) data 2008

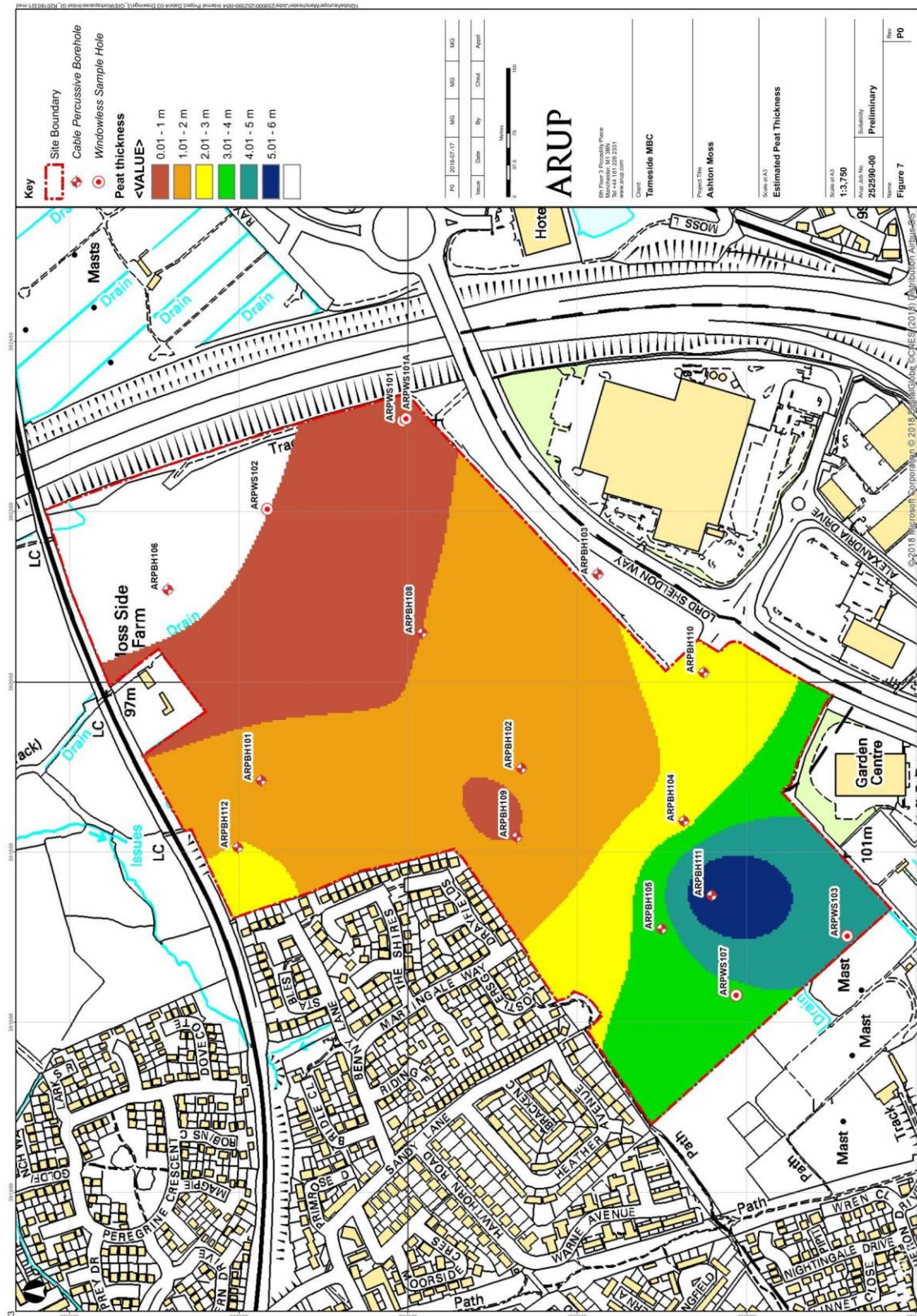
Natural England - Peaty Soils Location (England) Mapping for JPA30 Ashton Moss West



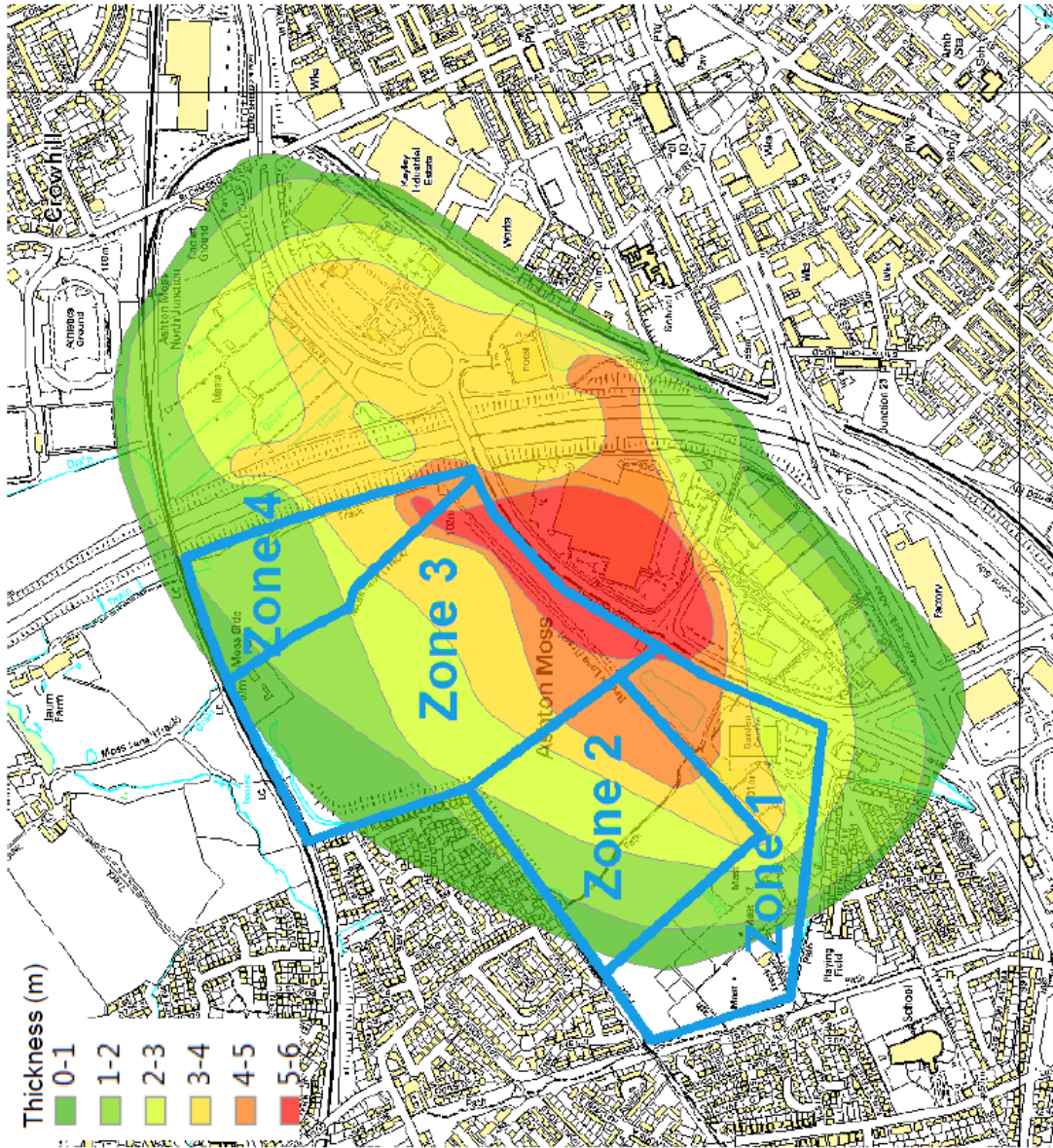
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Appendix C

Estimated peat extent and thickness¹²:



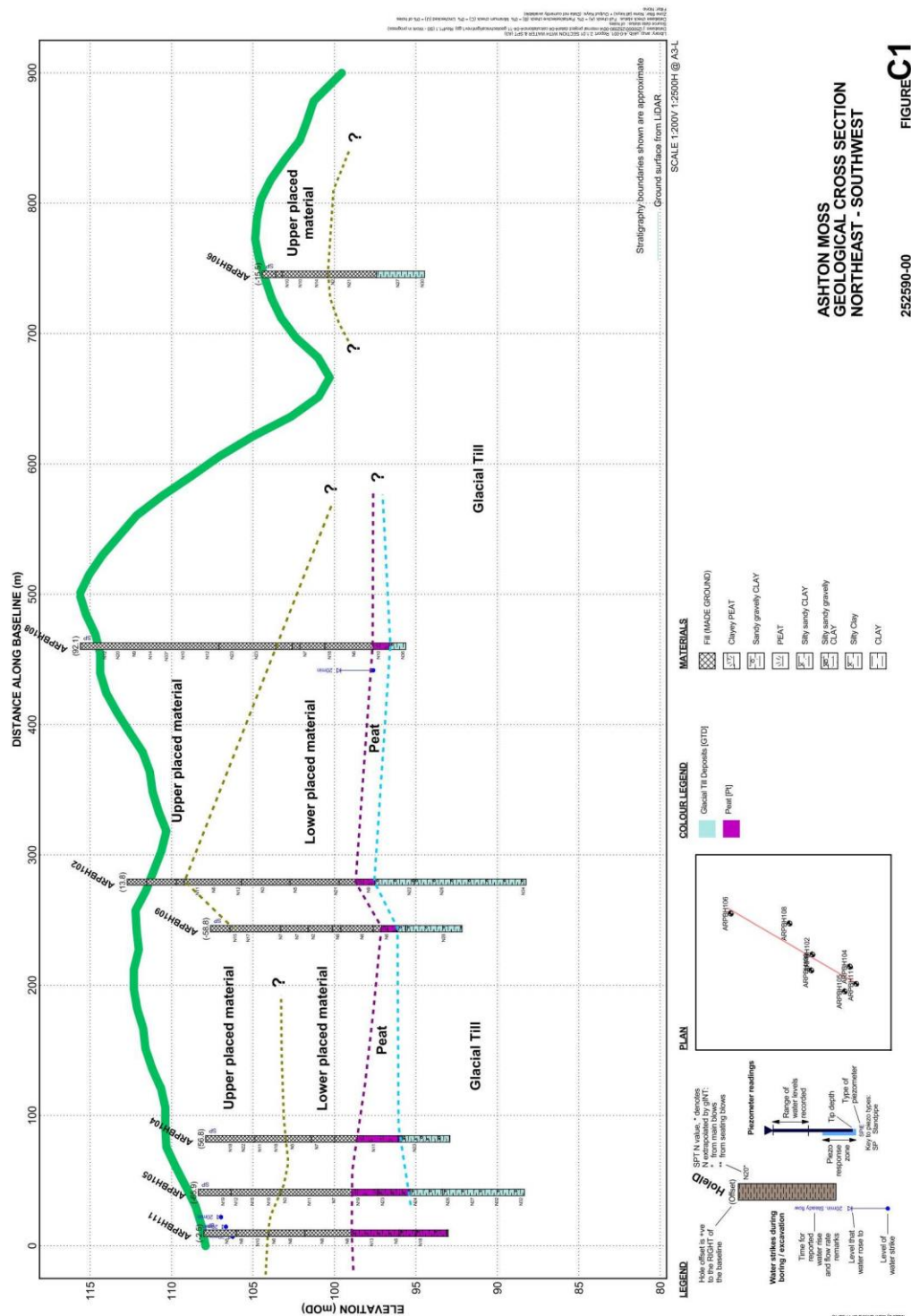
¹² PfE examination document [10.08.04] Preliminary Geotechnical Report



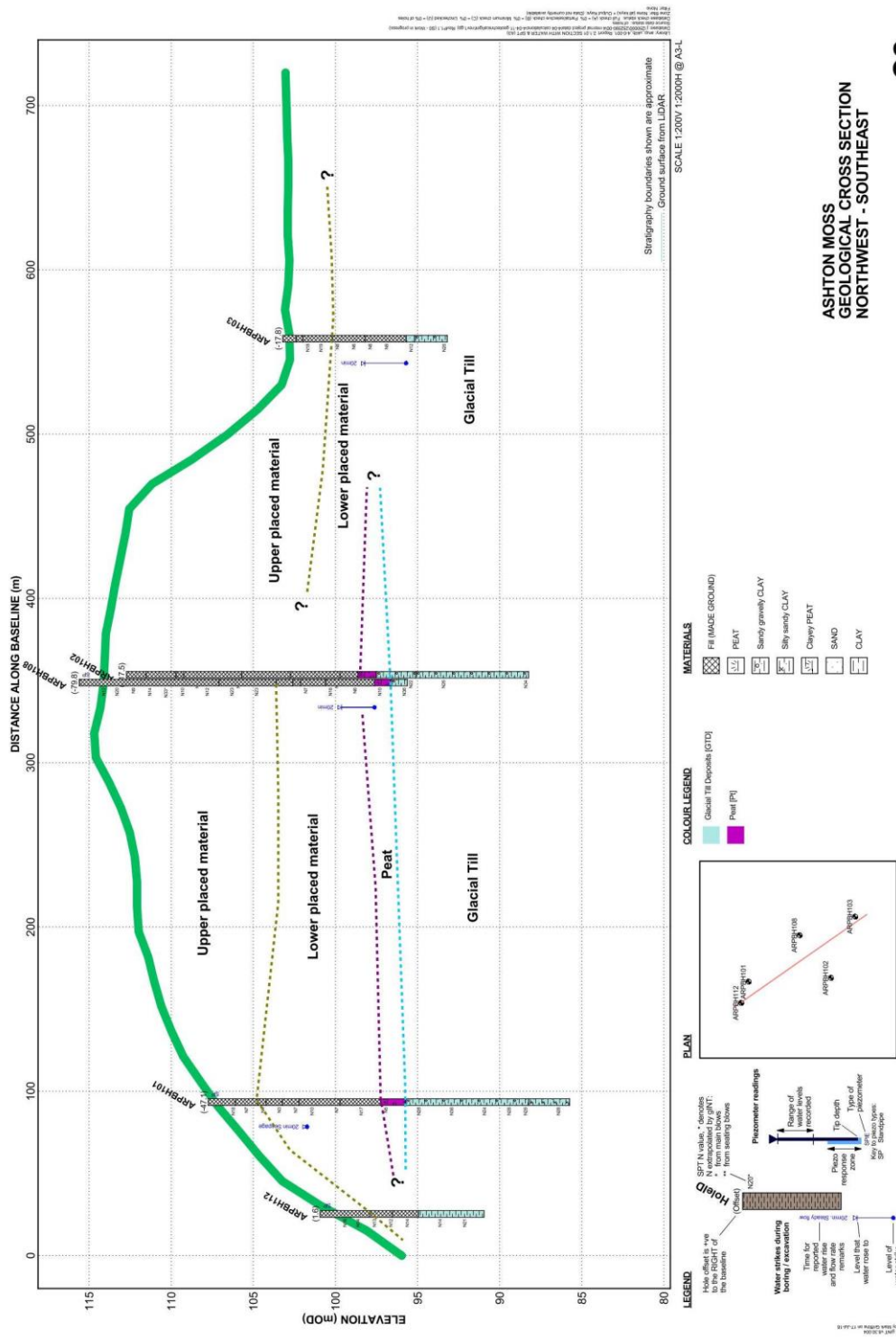
Estimated peat thickness (Mouchel)

Appendix D

Extent of placed material cross sections¹³:



¹³ P/E examination document [10.08.04] Preliminary Geotechnical Report



¹⁴ PfE examination document [10.08.04] Preliminary Geotechnical Report



Appendix F

Natural England/DEFRA Agricultural Land Classification:

