

Places for Everyone Joint Development Plan Document

Statement of Common Ground (Peaty Soils)

Policy JP Allocation 1.1 – Northern Gateway (Heywood/Pilsworth)

28 April 2023

1. Purpose

- 1.1. This Statement of Common Ground (SoCG) has been jointly prepared by Bury and Rochdale Councils on behalf of GMCA, Natural England and the key site promoter (Northern Gateway Delivery Vehicle) within the proposed Heywood/Pilsworth allocation. This SoCG is in response to the Inspectors Action Point (AP135) as set out in their note (IN34) relating to the possible presence of peaty soils within the site.
- 1.2. 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 and the potential for restoration and likelihood of this being achieved.

2. Background

- 2.1. The Heywood/Pilsworth site proposed under Policy JPA1.1 is, in principle, a suitable and deliverable opportunity for transformational employment-led development that contributes to the overall strategy of the PfE. The Heywood/Pilsworth allocation is the largest employment allocation in the plan and is key to achieving the overall spatial strategy.
- 2.2. The Natural England/Defra 'Peaty Soils Location (England)' layer was published on the Natural England website on 9 July 2021. The data was produced by Natural England/Defra during June - October 2008, with the aim of identifying the extent of three classes of peaty soils for the purposes of the Partnership Project to Protect and Enhance Peat Soils. The three classes of peaty soils are: Deep Peaty Soils, Shallow Peaty Soils and Soils with Peaty Pockets.
- 2.3. The Northern Gateway Delivery Vehicle has commissioned a desk-based geo- environmental report (submission document ref [10.01.06](#)).
- 2.4. The plan at Appendix 1 of this statement is the 'Northern Gateway' Illustrative Development Framework Plan submitted as part of the GMCA evidence base supporting the proposed JPA1.1 allocation (submission document ref

[10.01.01](#)) overlaid with the available peaty soils mapping data referred to above.

- 2.5. At the Regulation 19 stage, Natural England did not raise any specific concerns that the development of the Heywood/Pilsworth site would have irreversible impacts on peat.

3. Extent of the peat

Areas of agreement

- 3.1. The proposed Heywood/Pilsworth allocation covers a total area of 640 hectares and contains three separate areas of 'deep peaty soils' as identified on the Natural England/Defra 'Peaty Soils Location (England)' layer. These are set out in the following table and the specific locations have been overlaid onto the Illustrative Development Framework Plan in Appendix 1.

Location	Area (ha)
South of Hareshill Road (Appendix 1 Area A)	23.52
North of Pike Fold Golf Club (Appendix 1 Area B)	4.59
North of Simister Island (M60 J18) (Appendix 1 Area C)	39.66
	67.77

- 3.2. In total 'deep peaty soils' are identified as covering around 68 hectares (10.6% of the allocation area).

Areas of disagreement

- 3.3. There are no areas of disagreement between the relevant parties regarding the extent of peat on the site.

4. Quality of the peat

Areas of agreement

- 4.1. There is very limited site-specific information from Natural England/Defra on the 'quality' of the peat within the proposed allocation at Heywood/Pilsworth other than its description as 'deep peaty soils'. At this stage no detailed intrusive testing has been undertaken to ascertain the actual extent, depth, or quality of the potential peat deposits.

- 4.2. Further work, including intrusive works/borehole sampling will be undertaken as part of evidence relating to ground conditions to assess the extent, depth and quality of the peat to inform the more detailed masterplanning and/or planning application(s) for the site.

Areas of disagreement

- 4.3. There are no areas of disagreement between the relevant parties regarding the quality of peat on the site.

5. Potential for restoration and likelihood of this being achieved

Areas of agreement

- 5.1. With reference to the plan at Appendix 1, a large proportion of the northern most area of peat identified on the mapping and closest to Hareshill Road (Area A) is within the part of the allocation that already has planning permission for residential and employment development known as South Heywood¹. That permission has already been implemented through the construction of a new link road from Junction 19 of the M62 linking to Hareshill Road and Pilsworth Road. Reserved matters applications for new housing have also been approved and are under construction.
- 5.2. The remainder of Area A is also located within the Illustrative Development Framework Plan and is identified partly for employment and partly for mixed use development. The development of this area, including the need for further assessment, would be considered through the future masterplanning/ planning application process. Given that it relates to a relatively small area it is not considered that this would impact on the delivery of the scale of development for the allocation as a whole set out in policy JPA1.1 of the PfE Plan.
- 5.3. In terms of the areas of identified peat on land to the north of Pike Fold Golf Club (Area B) and to the north of Simister Island (Area C), these sit within part of the site that is identified as potential employment development beyond the currently identified plan period (post 2037) and it is envisaged that the presence of peat can be adequately investigated and, if necessary, dealt with through future masterplanning and/or a planning application. In any event, the smaller and western-most of the parcels is only partly located within the allocation.
- 5.4. In addition, a relatively small part of the potential area of peat to the north of Simister Island (Area C) could be affected by National Highways' proposals to

¹ Rochdale Council planning application reference 16/01399/HYBR

improve the Simister Island Interchange between the M62, M60 and M66. In particular, the scheme that was recently consulted on includes a 'Northern Loop' that would pass through part of the area identified as a potential location for peat.

- 5.5. The land to the north of Pike Fold Golf Club (Area B) and to the north of Simister Island (Area C) sit within a wider area identified as mosslands and lowland farmland in Figure 8.1 of PfE. As such, Policy JP-G4 'Lowland wetlands and mosslands' would be applicable to these areas and includes suitable policy requirements in relation to peat that will allow for any opportunities for peatland restoration to be considered as part of the future masterplan or planning applications.
- 5.6. In addition, Rochdale's adopted Core Strategy (2016) includes the following policies relating to the consideration of peat in assessing development proposals:
- G1 - Tackling and adapting to climate change;
 - G3 - Renewable and low carbon energy developments; and
 - G7 - Increasing the value of biodiversity and geodiversity.

Areas of disagreement

- 5.7. It is Natural England's position that the area of peat to the south-west of the site (Areas B and C) would be suitable for restoration to wetland habitat and that Policy JPA1.1 should be modified to reflect this.
- 5.8. However, GMCA and the NGDV are unable to commit to this at the present time on the basis that the appropriateness and feasibility of restoring these areas would be determined following more detailed investigations undertaken in conjunction with the masterplanning of the site and any subsequent planning application(s). Furthermore, the approach towards peat would be considered against PfE Policy JP-G4 and, as such, GMCA and the NGDV do not consider it necessary to modify Policy JPA1.1.

6. Conclusion

GMCA position

- 6.1 The Heywood/Pilsworth site proposed under Policy JPA1.1 is, in principle, a suitable and deliverable opportunity for transformational employment-led development that contributes to the overall strategy of the PfE.
- 6.2 In total 'deep peaty soils' are identified as covering around 68 hectares (10.6% of the allocation area).

- 6.3 There is very limited site-specific information from Natural England/Defra on the 'quality' of the peat within the proposed allocation at Heywood/Pilsworth.
- 6.4 A large proportion of the northern most area of peat identified on the mapping and closest to Hareshill Road (Area A) is largely within the part of the allocation that already has planning permission as part of the wider South Heywood development but any additional areas of peat could be considered against existing relevant policies within the Rochdale Core Strategy.
- 6.5 In terms of the other areas identified to the north of Pike Fold Golf Club (Area B) and to the north of Simister Island (Area C), it is envisaged that the presence of peat can be adequately investigated and, if necessary, dealt with through future masterplanning and/or a planning application in accordance with PfE Policy JP-G4.

Northern Gateway Delivery Vehicle (NGDV) position

- 6.6 As the lead developer for the JPA1.1 allocation, NGDV's position is that the level of evidence supporting PfE, and specifically the collective Northern Gateway allocations, is both appropriate and proportionate. This is also the case in respect of the scope of the geo-environmental investigations undertaken to date supporting PfE.
- 6.7 As would be expected at this stage in the process, the evidence available is not wholly conclusive regarding the potential location, coverage, depth, or quality of peat within the site. Notwithstanding, NGDV's view is that this does not present an unworkable constraint to the delivery of the allocation as a whole nor the ability to simultaneously meet the objectives of the allocation policy and current national planning policy in respect of peat.
- 6.8 In parallel with a forthcoming detailed masterplanning exercise (a prerequisite of the process as set out in the proposed to be modified JPA1.1 policy), further geo-environmental work will be undertaken. This information, alongside other studies, will inform the masterplan layout and appropriate siting of key road infrastructure, development parcels, and strategic areas of green and blue infrastructure. In the context of the overall scope of the allocation area therefore, NGDV's view is that the potential presence of peaty soils can be adequately and satisfactorily addressed through the masterplanning exercise, which will be undertaken in advance of a planning application submission.
- 6.9 NGDV looks forward to working with Bury and Rochdale Councils and key consultees, including Natural England, as part of a detailed masterplanning and pre-application exercise to ensure that all pertinent matters, including potential peat deposits, are suitably addressed. In conclusion, NGDV's view is

that JPA1.1 is a wholly suitable and deliverable employment-led development allocation and it is sound, meeting the tests of NPPF paragraph 35.

Natural England position

- 6.10 Natural England agree that further investigations are required in order to ascertain the extent and quality of the peat.
- 6.11 Since the areas of peat are relatively small in comparison to the overall size of the allocation, Natural England are of the opinion that this allocation can be brought forward in such a way that the peat not affected by existing planning permissions, could be protected from development and restored to wetland habitat.
- 6.12 This should be incorporated into policy wording of any modifications.

Signed for Bury Council on behalf of the nine PfE districts

Name: Paul Lakin

Position: Executive Director of Place

Date: 27 April 2023

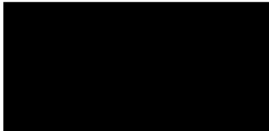
Signature: 

Signed for Rochdale Council on behalf of the nine PfE districts

Name: Daniela Ripa

Position: Interim Head of Planning

Date: 27 April 2023

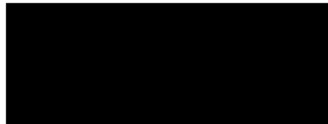
Signature: 

Signed for Natural England

Name: GINNY HINTON

Position: AREA MANAGER

Date: 27/04/23

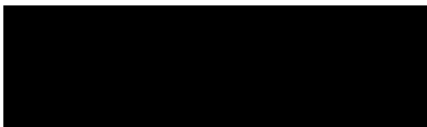
Signature: 

Signed for the Northern Gateway Development Vehicle

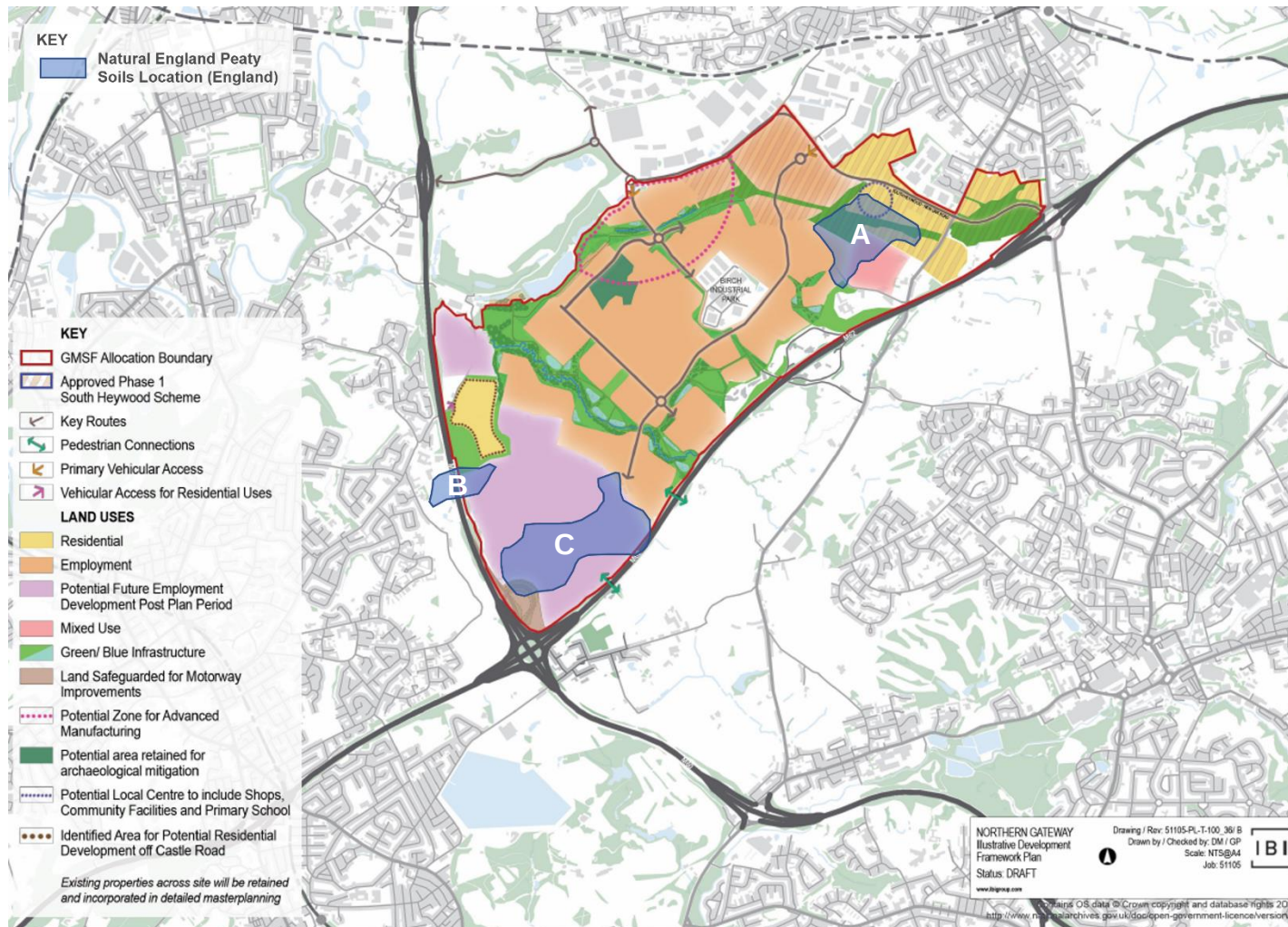
Name: Conor Vallely MTCP MRTPI

Position: Director, CV Planning, on behalf of the Northern Gateway Development Vehicle LLP

Date: 28th April 2023

Signature: 

Appendix 1: Illustrative Development Framework for JPA1.1 – Northern Gateway (Heywood/Pilsworth) and ‘the extent of ‘deep peaty soils’ as identified by Natural England/Defra.



Statement of Common Ground – JPA1.1 Heywood/Pilsworth: Peaty Soils