Places for Everyone Joint Development Plan Document

Statement of Common Ground between Salford City Council, Peel Land and Property and Natural England

Policy JP Allocation 29 – Port Salford Extension

25 May 2023

1. Purpose

1.1. This Statement of Common Ground (SoCG) relates to the proposed Port Salford Extension allocation (JPA29). It has been jointly prepared by Salford City Council (SCC) on behalf of the GMCA, Natural England and the site promoter for the Port Salford Extension allocation. It is in response to the Inspectors' Action Point – AP134, in Places for Everyone (PfE) Examination Document IN32.

1.2. The relevant site promoter identified for the purposes of this SoCG is Peel Land and Property (Peel L&P).

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 Port Salford Extension allocation lies within the eastern extent of Chat Moss and covers an area of 108.6 hectares. Chat Moss is a designation in the Salford Local Plan: Development Management Policies and Designations (SLP:DMP) (policy GI2 Chat Moss)[1]. It is shown on the policies map and covers an area within Salford of 2,358 hectares[2]. Paragraph 22.9 of the SLP:DMP notes that some land within Chat Moss may be allocated for development in the future through Places for Everyone. Chat Moss extends outside of Salford into Wigan; figures used in this SoCG relate to the area covered by the SLP:DMP designation, unless otherwise stated.

2.2 The location of the allocation within the wider peat mass is set out at Examination Document GMCA59[3], which also shows the extent of the Great Manchester Wetlands Nature Improvement Area. The extent of peat on Chat Moss is also identified in the Supplementary Advice Document for Manchester Mosses SAC produced by Natural England. This highlights the need 'to

[1] PfE examination document reference OD24, page 207
[2] PfE examination document reference OD24a
[3] The Manchester Mosses Special Area of Conservation is not mapped on GMCA59, but is mapped in relation to the allocations on page 21 of the Habitats Regulations Assessment (SD20)

maintain or restore the connectivity of the site [the SAC] to its wider landscape in order to meet the conservation objectives'. Although this document does not form part of the development plan for Salford, it is Natural England's statutory supplementary advice about the European Site Conservation Objectives relating to Manchester Mosses SAC.

2.3 Chat Moss overall is the largest remaining fragment of lowland peatland within Greater Manchester, although has been severely degraded and highly modified through intensive agriculture and industrial peat extraction since the late 18th Century. The construction of a Manchester-Liverpool railway in 1830, built largely on floating sleepers through the heart of the bog, accelerated degradation of the moss by facilitating intensive peat extraction, and carried Manchester's nightsoil that was applied across the moss as fertiliser.

2.4 As Grade 1 agricultural land, large swathes of Chat Moss remain intensively cultivated. This history of deep drainage, nutrient deposition and peat extraction is visible across the moss, which is criss-crossed with drainage ditches often over a metre in depth. Smaller field drains are present in the soil at regular intervals across most of Chat Moss. The construction of the M62 motorway in 1978 removed several more metres of peat where it crosses Chat Moss, with severe implications for the overall hydrology of the moss.

2.5 Given the location and history of the Port Salford Extension allocation, there are a number of site-specific characteristics which need to be considered and weighed in the balance, including:

- Intensive agriculture and industrial peat extraction since the late 18th Century. This includes deep drainage and regular cultivation for arable agriculture, grassland cropping and turf farming
- Continuing intensive cultivation, including the use of herbicides, pesticides and fertilisers
- The largescale overlaying of the site with significant quantities of "nightsoil" (human waste), fertilizers and industrial waste
- Deposition of industrial waste
- Establishment and operation of the (now disused) Boysnope Golf Course; which includes deposition of large volumes of inert material;
- Potential Made Ground associated with construction of the railway and historic tramways
- Presence of open ditches across the site to facilitate surface water drainage for agricultural purposes which have the potential to transport and deposit contaminants
- Ground gas associated with peat deposits
- The proximity to the M62 motorway, Barton Aerodrome and a ground gas extraction plant has an impact on drainage of land in the allocation

3. Extent of peat on the site

Natural England Deep Peaty Soils data

3.1 The majority of the Port Salford Extension allocation is within an area classified by Natural England / Defra as being comprised of, or containing, 'deep peaty soils'.

3.2 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. An extract from the Natural England / Defra layer was added to the PfE examination library on 15 February 2023 as document reference GMCA59.

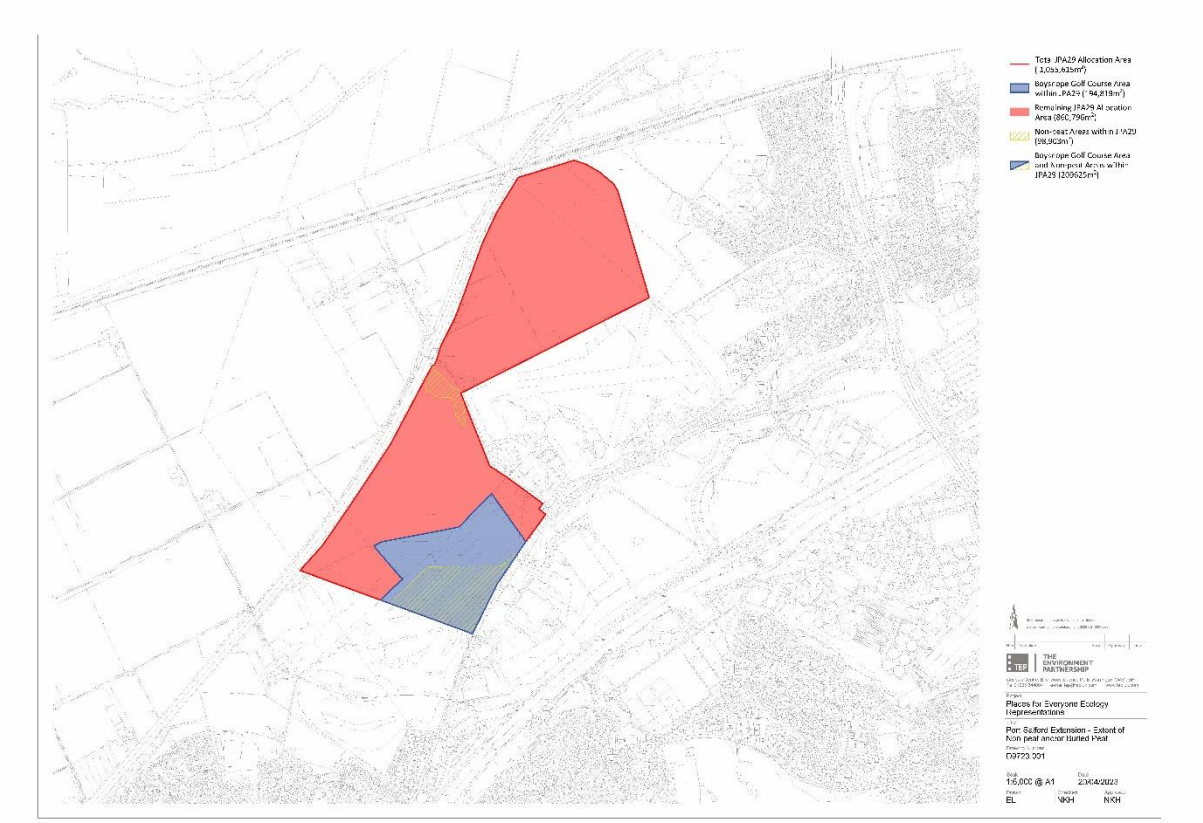
Investigations undertaken by the site promoter

3.3 Shepherd Gilmour Consulting Engineers (SGi) prepared a Phase 1 Geo-environmental assessment on behalf of the site promoter that was issued in March 2019. This report was made available as part of the evidence base for consultation on the publication version of PfE which ran from 9 August 2021 to 3 October 2021. The report was also submitted to the Secretary of State in February 2022 [submission document reference 10.07.57] alongside the plan for examination.

3.4 As part of their assessment, SGi reviewed the British Geological Survey (BGS) map for the site, (1:50,000, Solid & Drift edition) and online records. These records indicated that peat deposits may not be present across much of the southern site sector of the allocation. Further to this, the records indicate that peat deposits may be present in the central and northern areas of the site with a typical thickness of approximately 2.0m [submission document reference 10.07.57, paragraph 4.9].

3.5 Subsequent to the phase 1 assessment, more detailed Ground Investigations (GI) have been carried out on behalf of the site promoter by AECOM in 2022. These indicate that the allocation is largely underlain by deep peat (defined as over 0.4m in depth), ranging from depths of 0.5m to 4.5m. The peaty soils are generally at or near the surface, except at the former Boysnope Golf Course part of the allocation, which is overlaid by fill so the peat is below surface. This is shown as the blue area in the image below.

3.6 British Geological Survey borehole data indicates areas absent of deep peat (partly including Boysnope Golf Course). These are shown as yellow hatch on the image below.



3.7 Collectively the areas where peat is absent or buried beneath inert fill amount to 20.96ha (i.e. around 20% of the allocation area) based on the British Geological Survey

Peel L&P position

3.8 Peel has subsequently carried out detailed ground investigations to ensure a robust understanding of the geological conditions that support technical assessment and conclusions.

3.9 These more detailed Ground Investigations (AECOM – 2022, shared with GMCA during the preparation of the SoCG) have demonstrated the absence of peat soils in the southeast sector, confirming indications from the British Geological Survey. The Ground Investigation report can be added to the examination library if requested.

3.10 Peel notes that GMCA indicates peat deposits underlie 99% of the site. However, Peel considers that this statement contradicts the British Geological Survey Data and additional ground condition survey work which demonstrates the absence of peat soils in the southeast part of the site as summarized above, with 20% of the site either not containing peat or containing peat which is beneath significant inert fill, with additional restoration impracticalities resulting from this.

Area(s) of Agreement

3.11 The NE 'Deep Peaty Soils' layer is likely to define the main historical extent of peat at Port Salford Extension. However, the analysis carried out on behalf of the site promoter provides a more detailed, site specific and up-to-date assessment than the 2008 exercise undertaken by Natural England / DEFRA.

3.12 There are some discrepancies between the Natural England data and the more recent investigations undertaken by the site promoter. The recent site investigations were supplied to GMCA by the site promoter during the SoCG process but neither GMCA nor NE have had sufficient time to review this information.

3.13 Further investigations will be needed to fully assess conditions on the site. These would be expected through detailed site planning work.

Area(s) of disagreement

3.14 Peel notes that GMCA and Natural England indicate that peat deposits underlie 99% of the site. However, Peel consider that this statement contradicts the British Geological Survey Data, which is included within the SGi report [Submission Document reference 10.07.57] and consider that their recently prepared ground conditions evidence confirms the absence of peat soils in the southeast part of the site as summarized above. Peel considers that 20% of the site either does not contain peat or contains peat which is beneath significant inert fill, with additional restoration impracticalities.

3.15 As detailed at 3.9 above, the additional 'recently prepared' ground conditions' evidence referred to in 3.14, has only recently been received by the local planning authority. Therefore, until such time that this additional evidence has been reviewed by all parties sufficiently and the further investigations referred to in 3.13 above carried out, Natural England cannot agree that "20% of the site either does not contain peat or contains peat which is beneath significant inert fill, with additional restoration impracticalities".

4. Quality of the peat

4.1 There is very limited site-specific information from Natural England / DEFRA on the 'quality' of the peat at the Port Salford Extension allocation (and the wider Chat Moss area). The only data that is available, is that shown on the 'deep peaty soils' layer based on 2008 data and published in 2021.

4.2 The analysis carried out on behalf of the site promoter provides a more detailed, site specific and up-to-date assessment than the 2008 exercise undertaken by NE/DEFRA. Relevant documents are referenced in section 3 of this SoCG.

4.3 The depth of the peat is relevant to the quality as deep peat is more likely to be better protected from degradation from agricultural practices and drainage. Deep peat is generally accepted to comprise soils with a peat depth of greater

than 0.4m. Deep peat is more likely to be better protected from degradation from agricultural practices and drainage.

Area(s) of agreement

4.4 The depth of peat across the proposed allocation site (where present) varies between 0.5 and 4.5m, with the majority being approximately 2.0m in depth.

4.5 Habitat Surveys in the period 2019 to 2021[4] carried out for the purpose of site promotion, capacity studies and masterplanning confirm that there are currently no lowland bog habitats on site. Almost all the site has non-wetland habitat at surface, with the exception of small areas of marshy grassland and wet woodland lining some of the deep agricultural ditches.

4.6 The top layer of peat has been highly modified and degraded for the reasons set out in section 2 of this statement of common ground.

4.7 The current land use is damaging with high levels of carbon emissions from the existing peat at this location.

4.8 Further investigation would be needed to confirm the quality of the peat in this location.

Area(s) of disagreement

4.9 There is disagreement between Peel and NE regarding whether the Von Post classification system is a useful way to determine the quality of the peat.

4.10 The Peel position is that geological analysis of the peat materials confirmed that the soil is heavily degraded at all depths with a high loam content. This suggests extensive degradation with a reduced organic potential and therefore a significant (irreversible) reduction in the quality of the peat. The detailed geological analysis using the Von Post classification system confirmed that the Peat is classified as H4-H6 throughout its depth. Peel consider that this classification confirms the peat is in a degraded state associated with prolonged drainage.

4.11 The Natural England position is that the Von Post Humification Scale is a field test to rank organic soils by humification (decomposition) and does not determine the quality of the peat alone, it determines the levels of humification which is affected by the type of vegetation the peat was formed from and how quickly material entered the Catotelm and became incorporated into the peat mass. Furthermore, Natural England wish to highlight that Von Post values increase naturally the deeper the peat and consider peat classified as H4 to H6 at the depths recorded within the allocation to be capable of restoration.

[4] Including PfE submission document reference 10.07.56 and surveys submitted through Regulation 19 representations by the site promoter

4.12 GMCA's position is that it has not reviewed evidence related to the site's classification in terms of the Von Post system and has not relied on such evidence for the soundness of the plan. The GMCA considers the further work agreed to be necessary at 4.8 above, will assist in further determining the quality of peat.

4.13 Peel further contends that in addition to the points agreed with GMCA relating to the degradation of the land, the diversion of the River Irwell into the Manchester Ship Canal to the South of the allocation materially altered the hydrogeology in the mid to late 19th century. These works probably initiated the rapid reduction of groundwater in the allocation area and remain a constant factor to the present day. Peel's geotechnical expert confirms that this site's geological and hydrogeological conditions are highly unique and should be considered as such. A material consideration is the anthropogenic changes influencing the superficial drift deposit's potential to form the baseflow to a main river. The hydrogeology of the current site setting results in high water demand from the superficial drift (near surface soils), resulting in an exaggerated base flow toward the Salteye.

4.14 Natural England does not consider that sufficient evidence on the hydrogeological conditions of the allocation site has been provided, more evidence is needed to demonstrate how hydrogeology relates to the perched water table in the peat.

5. Potential for restoration

Area(s) of agreement

5.1 There is agreement between GMCA, Peel and Natural England that it would be theoretically possible to restore a peatland habitat, which may include some areas of active bog. The potential for restoration to other peatland habitats (e.g. fen) is higher and would require fewer resources and less time than restoration to an active peat-forming bog habitat.

Area(s) of disagreement

5.2 The parties disagree as to the extent to which restoration is achievable.

<u>Salford City Council position on behalf of the nine PfE districts (GMCA)</u>

5.3 It is likely that it would be technically feasible to restore the peat within allocation JPA29. However, taking into consideration the site-specific set of characteristics and constraints outlined in section 2 of this SoCG, it is not considered that there is potential for full restoration of the peat or extensive wetland creation.

5.4 Further, the peripheral location of the site in relation to the main part of Chat Moss, including the Biodiversity Heartland identified in the SLP:DMP north of the M62, means that this site would not be seen as a priority for restoration by

Salford City Council in the context of the newly adopted SLP:DMP (see 'likelihood of restoration' below for further details).

5.5 Restoring the peat to an active bog would take a significant number of years and require a number of actions which would consume significant resources, for example:

- Removal of the topsoil
- Blockage of the existing extensive drainage network.
- A mechanism to store rainwater and raise the water table on the site (typically low bunds of peat are constructed to achieve this)
- Measures to ensure no increase in flood risk to adjacent land and built development
- Import of key species, due to the absence of bog vegetation on the site at present

5.6 Furthermore, whilst elements of peatland restoration may be possible on the Port Salford Extension site, the location presents practical challenges to this process which mean that it is highly unlikely that the land could be restored to lowland raised bog, due to several significant technical constraints:

- A pre-requisite is a high water table, with water typically at surface +/- 2cm. This would require drain-blocking and breaking down of former agricultural pipes. However the presence of the neighbouring Barton Aerodrome and air safety restrictions on open water as a bird attractant would likely result in Civil Aviation Authority objections due to risks from bird strike. In order to maintain a suitable water table for bog restoration and avoid summer drought, it is considered that during the restoration phase areas of open water would occur in wetter seasons
- The proximity of the M62 and the aerodrome mean that there is a strong likelihood that essential infrastructure would be at heightened risk of flooding. There might be engineering solutions to reduce flooding risk by containing water within the site, and these (sheet-pile) solutions have been applied elsewhere, but given the very high cost of this, it is likely to be unviable and monies would be better spent on restoration activities elsewhere on Chat Moss where intensive engineering solutions are not required
- Bog restoration requires reasonably good air quality with low N-deposition to reduce nutrient levels, so the proximity of the M62 and A57 is a detractor.

5.7 Peatland restoration is more successful and less resource-intensive on a per hectare basis if carried out over a wider area, given the importance of the underlying hydrology. With the exception of small areas within New Moss Wood, the proposed allocation would remain isolated from other existing areas of existing or restored bog habitat by the M62 motorway to the north and the River Glaze to the west. The M62 is considered to be a significant hydrological barrier. Whilst GMCA accepts that the site is located within the Great Manchester Wetlands Nature improvement Area (NIA) and that small areas of habitat can have a role to play as "steppingstones", their value in the

wider context of peat restoration within the NIA will always be lower than on other sites which are more central to the peat mass.

5.8 The potential for restoration to other peatland habitats (e.g., fen) is slightly higher than to lowland raised bog but is still considered low on this site. Moreover, such restoration would still require landowners to be willing and (for most if not all habitats) would also require significant resource inputs. There may be some potential for some form of paludiculture[5] on this site, but even that would be far more constrained that on other parts of Chat Moss, with a smaller variety of crops being possible.

5.9 Restoration of any residual peat under the former Boysnope Golf Course would, in practice, be extremely challenging as it would require excavation and removal of fill in significant quantity and in any case, the peat under the golf course is likely to have become so degraded by compression and dewatering that it cannot be restored; indeed exposing it to the atmosphere would accelerate oxidisation of the peat and resultant carbon dioxide emissions.

5.10 Notwithstanding this, there may be opportunities as part of the masterplanning process as required by criterion 1 of the allocation policy to retain carbon storage functions within the developed site through the provision of habitats such as wetlands and marshy grassland as part of the landscaping for the site. Such an approach would be consistent with the proposed allocation policy wording.

<u>Peel L&P position</u>

5.11 Peel notes the GMCA position that restoration is technically feasible but highly unlikely.

5.12 Peel's geotechnical expert considers that the peat in this allocation is of low quality and degraded in nature. This, in combination with the hydrological, engineering, regulatory and planning-related complexities of the site has led them to conclude that there is no realistic prospect of a successful restoration, either to bog habitats or to a paludiculture system. Peel considers that measures to re-wet the site would be technically very demanding, requiring a number of different approaches to protect existing infrastructure and neighbouring property. The over-riding hydrological constraints mean that there will be numerous "de-hydration" pathways. Peel does not consider that sufficient evidence exists to suggest that degraded peats such as those found on this site at the periphery of Chat Moss can be successfully restored to self-sustaining bog habitat.

[5] Paludiculture is a form of agricultural production that minimises degradation of the peat soil and, where possible, can even act to restore the peat layer through the cultivation of peat-forming reed species and Sphagnum mosses.

5.13 Although Peel acknowledge that restoration is theoretically possible, Peel consider that the significant time (likely in excess of 30 years), engineering, financial and legal barriers to restoration will severely inhibit the ability for successful restoration.

5.14 Peel consider that there is no potential for the successful restoration, even to paludiculture, of this site. Peel consider that insufficient evidence has been presented at this point in time to demonstrate that the area could be 're-wetted' within a ten-year period to facilitate viable peatland restoration. Instead Peel consider that the special characteristics of the site set out in section 2 together with the evidence available at Regulation 19 and further supported by more recently produced evidence demonstrates that this cannot be achieved. Peel's geotechnical expert notes that to achieve any degree of saturation within the superficial drift, extensive engineering works are required with significant third-party rights and issues to be considered. Notwithstanding this, Peel consider the timescales would exceed twenty to thirty years to implement works and to see a noticeable change.

5.15 Peel's geotechnical specialist considers that the comparison of the site with other areas where peatland restoration is considered viable is not appropriate in a simplistic manner. The geology, hydrogeology and specific engineering circumstances must be considered on a site-specific basis and by reference to evidence. In this instance there are significant geotechnical engineering challenges and risk to critical infrastructure unique to this site.

5.16 Given this and the site-specific challenges summarised in section 2 of this document, Peel consider that restoration would be especially challenging, and that any conclusions on this site and its restoration potential should be based on site specific evidence rather than high level comparison with other sites within the wider Chat Moss area.

<u>Natural England position</u>

5.17 Natural England consider it is entirely feasible to restore the hydrology of the Port Salford site and create wetland habitat in order to retain carbon, enhance biodiversity and restore to carbon sequestering peat over time. Natural England does not consider that sufficient evidence has been provided to demonstrate that restoration is as challenging as suggested by the site promoter.

5.18 Their approach to restoration would be to restore steppingstones of the site to bog, focused on locations of better-quality peat as identified by site investigations. The majority of the site could then be re-wet to create fen, wet grassland or wetter farming practices through paludiculture. This would not require the removal of nightsoil and would retain carbon within the soil. This low carbon, transitional approach would result in more extensive bog habitat developing in the long term. It is not necessary to carry out all of the actions listed in paragraph 5.5 to restore the peat in line with the approach we describe.

5.19 It is important to note that areas of restored bog/wetland habitat need to be surrounded by wet peat to allow the hydrological function that is required to support the habitat. Restoration to wetland habitats could be achieved within 5 to 10 years, and within the specific site constraints using low-cost bunding methodologies.

5.20 Natural England has experience of successfully restoring sites within similar constraints and can evidence that significant resource/cost/engineering works were not required. We have evidence to show that small areas of degraded peat in urban areas and in proximity to infrastructure can be successfully restored, for example, Risley Moss in Warrington has a 'mini moss' which is approximately 2 Ha in size.

5.21 Natural England does not agree with regards to the unfeasibility of restoring the peat. GMCA have clarified that more work is required in order to determine the quality of the peat in the allocation. The constraints identified by GMCA in relation to restoration would not prevent restoration of the peat.

5.22 Natural England strongly disagrees that the constraints listed in paragraph 5.6 would mean that it is highly unlikely the land could be restored for the following reasons:

- With the correct water management, utilising overflows and water level controls, there would not be areas of open water even in wetter seasons.
- It is incorrect to say that the proximity to the M62 and other essential infrastructure would be at risk of flooding. Holcroft Moss, Risley Moss and Astley & Bedford Moss are all sites of peatland restoration in very close proximity to Motorways and other essential infrastructure. The sites are managed using a hydrological buffer zone, cut-off drains and low cost peat bunding and there is no flooding risk.
- Fen and wet grassland are less sensitive to nitrogen deposition and bog is more resilient to nitrogen deposition when there is a higher water table so Natural England do not consider the proximity to major roads a reason not to restore peat.

6. Likelihood of restoration

Area(s) of agreement

6.1 GMCA and Peel agree that any form of peatland restoration on this site is extremely unlikely, with Peel's position going further than GMCA's in that Peel contend that there is no realistic prospect of successful restoration even to paludiculture.

Area(s) of disagreement

6.2 Parties disagree in relation to the level of likelihood of restoration, particularly with regards to the site-specific constraints and characteristics, amount of resources, money, and time required.

Salford City Council Position on behalf of the nine PfE districts (GMCA)

6.3 For reasons set out below, it is highly unlikely that the entirety of the peat land at the Port Salford Extension allocation will be restored. Without PfE development proposals there are no identified resources or programmes to restore any of this site.

6.4 There are currently no lowland bog habitats on site. Almost all the site has non-wetland habitat at surface, with the exception of small areas of marshy grassland and wet woodland lining some of the deep agricultural ditches.

6.5 The site is in private ownership with no indication that the owner will restore the peat or sell their land to facilitate this (instead they are promoting it for employment use through PfE). Moreover, no resources have been identified to acquire this land from the current landowner and then fund restoration. Whilst it is understood that some restoration grants are available, there is no evidence that these are sufficient to restore all the peatlands in England and for reasons stated above and below, the GMCA considers that this site would be unlikely to be a priority for such grants.

6.6 Policy GI2 of the adopted SLP:DMP [examination document reference OD24] relates to Chat Moss. As part of this, a biodiversity heartland is identified to the north of the M62 which is shown on the policies map (GI2/2) [examination document reference OD24a] and indicatively on figure 17 of the plan. This was identified following extensive studies looking at land use, biodiversity and hydrology and considering the location not only of existing and proposed biodiversity assets and peat restoration sites but also competing land use priorities such as agriculture and recreation, given that Chat Moss represents the majority of the Green Belt within Salford. The identification of a biodiversity heartland was found sound as part of the examination of the SLP:DMP and is part of the statutory development plan for Salford.

6.7 Within the biodiversity heartland, policy GI2 is clear that the priority will be to secure the restoration of lowland raised bog and the enhancement of the Botany Bay Wood site of biological importance. Allocation JPA29 is outside the biodiversity heartland. Outside the Biodiversity Heartland, policy GI2 places equal weight on other land uses / functions, such as public access and recreation. This further reduces the likelihood of any available resources for further bog restoration being directed towards the Port Salford Extension allocation.

6.8 Given the location on the periphery of the peat mass, on the edge of the urban area and hydrologically separated from the main part of Chat Moss and the biodiversity heartland by the M62, the allocated land would be low on the list of potential restoration opportunities. Current restoration of Chat Moss is focused on the biodiversity heartland. Whilst GMCA acknowledges that Natural England does not agree that the biodiversity heartland is the priority, this is a policy within Salford's newly adopted Local Plan (policy GI2). Note

that all current restoration sites within Salford other than New Moss Wood are located within the Heartland.

6.9 The likelihood of restoration of the Port Salford Extension site is dependent on the wider ambitions for restoration in Chat Moss, the resources realistically available for this work, and the priority for the Port Salford Extension site compared to other possible recipients of available resources. The Greater Manchester (GM) 5 Year Environment Plan includes the target of 50% to 75% of GM's peatland in restoration. This is an ambitious target. Currently, 207.5 hectares of Chat Moss in Salford is being restored to lowland raised bog or a complementary wetland habitat. Most of this 207.5 hectares is within the biodiversity heartland and comprises 9% of the total area of Chat Moss that is within Salford. It is understood that Natural England recently purchased around 154 hectares of land at Chat Moss, of which 119 hectares is in Salford, with the aim of restoration. This is likely to be a long-term programme of restoration work. Including the 207.5 hectares currently being restored, the land purchased by Natural England, and planned restoration on a former quarry site (57 hectares), approximately 16% of Chat Moss within Salford would be in restoration management. There are currently limited financial resources identified for further land purchase and restoration programmes. This illustrates the scale of the challenge to achieve the lower end of the Greater Manchester 5 Year Plan's 50% to 75% restoration target.

6.10 The Defra Peat Pilot report for Greater Manchester models two land use change scenarios at Chat Moss reflecting the ambitions in the Greater Manchester 5 Year Environment Plan relating to peatland restoration (as set out in paragraph 5.8 above). The peat pilot looked at possible scenarios where GMCA could look to manage against their 50 – 75% peat restoration targets within the Environment Plan. This was not a prescriptive proposal for certain parcels of land, but rather hypothetical proposals for where land use change could support emissions reductions and what that could look like across the whole of Chat Moss. However, the study included some consideration of delivery issues (pre-existing land cover, surrounding land cover, proximity to major infrastructure, and creation of buffer zones) and is considered a reasonable indication of what may be realistic if the ambitious policy targets were achieved. Under these scenarios, the peat pilot assumes that 50% and 75% of peat under intensive agricultural land uses (turf production, cropland, and intensive grassland) is converted to paludiculture by 2038. Both the 50% and 75% scenarios do not identify any paludiculture on, or restoration of, the land where the proposed Port Salford Extension allocation is sited. Even under an additional scenario in the Peat Pilot (maximum restoration) there would be no bog restoration envisaged on the Port Salford Extension site, with the vast majority of the land being identified as paludiculture[6]. Peel is working with its tenants to explore the feasibility of implementing paludiculture on other parts of its Chat Moss estate, and is working with the Lancashire Wildlife Trust and Salty Co on this and other initiatives through the Chat Moss partnership.

[6] As identified at paragraph 5.4 of this SoCG, in practice it is extremely unlikely that the land proposed for Port Salford Extension would be appropriate for paludiculture

6.11 Whilst lowland bog restoration has been recently started on other sites in the north-west of England these have required significant engineering interventions to remove topsoils and restore the hydrology. As outlined here, it is considered that the significant engineering and infrastructural constraints at the proposed allocation will further reduce the prospects for bog restoration through natural regeneration, even with re-wetting.

6.12 The value of the site for other uses such as development needs to be considered in the context of the likelihood of peatland restoration (not least due to the impact on landowner willingness for land use change). The site has been assessed through the PfE site selection process (it meets criteria 2, 5 and 6 as defined in the relevant paragraphs from 6.22 of submission document reference 03.04.01) and the Integrated Assessment for the plan. Specific benefits of the development of this proposed allocation include:

- A unique opportunity for Salford, Greater Manchester and the North providing multi-modal access, at the heart of the UK's second largest consumer market and in one of the most attractive locations in the country for warehousing development. Thereby enhancing the Core Growth Area and supporting the competitiveness of northern areas.
- Supporting a more sustainable logistics sector. Port Salford can provide a nationally significant logistics hub, with water and rail access and adjacent to the M60/M62/M602 interchange. The extension would form part of an integrated facility within the Port Salford site south of the A57, enabling occupiers to utilise the rail and water connections for freight movement.
- It will support a significant number of job opportunities and support skills development in a location close to areas experiencing high levels of deprivation, including lower than average educational attainment, skill levels and employment rates.
- Minimising the impact on the Green Belt, reflecting conclusions of the Green Belt Assessment (as summarised in the site allocation topic paper in section 14, 10.07.71)

6.13 These benefits are specific to the Port Salford Extension site location. Therefore, it is highly unlikely that restoration would be prioritised here before other locations within Chat Moss. Given the scale of the challenge to achieve policy aims for peat restoration in Greater Manchester, it is highly likely that some parts of Chat Moss will be restored whilst others will not. This wider context provides a further basis for the selection of sites for restoration that reduces the likelihood of restoration on the Port Salford Extension site.

6.14 Even without development it could be reasonably anticipated that the carbon stored within the peat on this site would be lost to the atmosphere within the coming decades[7]. In comparison, development of the site through the allocation enables the potential for a contribution to be made to bog restoration elsewhere. This is consistent with the proposed modification to

[7] A Defra Peat Pilot report for Greater Manchester from September 2021 (published at Annex 1 of the Turf Production Background Report that was produced for the Salford Local Plan examination) notes that at the current rate of emissions the entire carbon store on Chat Moss would be lost within 60 years (page 36 of the annex).

JPA29 [as shown in GMCA82 prepared in response to the Inspectors' Action Points from week 8 of the hearings, specifically AP127] to add a new criterion to require a 10% net gain in biodiversity with a priority for this including the restoration of lowland raised bog and complementary habitats in Chat Moss located to the north of the allocation boundary. With regards to this, the GMCA understand that the site promoter owns a substantial part of the Chat Moss area within Salford and is setting up a biodiversity offsetting bank in the area. This involves them working with stakeholders including Natural England, Salford City Council, the Lancashire Wildlife Trust to explore opportunities for mossland restoration, biodiversity enhancement and carbon storage.

6.15 There may be opportunities to retain carbon storage functions within the developed site through the provision of habitats such as wetlands and marshy grassland as part of the structural landscaping. These types of habitat have relatively low operational carbon emissions, certainly a lot less than ongoing agricultural use of the land. In addition, there are various requirements within the site allocation policy as submitted that would be considered through the masterplanning process and assist in mitigating the impact on peat. These include criteria 1 (masterplanning), 12 (a minimum 10% biodiversity net gain), 13 (support the objectives of the Great Manchester Wetlands Nature Improvement Area), 18 (minimise the loss of the carbon storage function of the peat). Furthermore, the proposed allocation policy prioritises peat restoration as an element of its biodiversity net gain requirement (as shown in PfE examination document reference GMCA82).

Peel L&P position

6.16 For reasons set out previously and further clarified in this section, Peel's geotechnical expert considers that there is no evidence or realistic prospect that the peat land at the Port Salford Extension allocation can or will be successfully restored.

6.17 Peel's geotechnical specialist considers that the comparison of the site with other areas where peatland restoration is considered viable is not appropriate in a simplistic manner. The geology, hydrogeology and specific engineering circumstances must be considered on a site-specific basis. In this instance there are significant geotechnical engineering challenges and risk to critical infrastructure unique to this site. Site specific characteristics of note include the proximity to the Barton Aerodrome, the M62 and a national railway line (see 5.6).

6.18 The detailed scientific, geological, geotechnical and ecological site conditions summarised in section 2 and 4 of this statement (together with those in the following paragraphs in this section) have led Peel to conclude that restoration is not a realistic possibility.

6.19 The site is underlain by highly permeable deposits and is with the northern half of the site within the Environment Agency defined catchment for the Salteye Brook confirming hydraulic conductivity. This confirms that water is

drawn to the main river from the peat and glaciofluvial deposits. This process is exaggerated by anthropogenic influence in the 19th, 20th and 21st centuries.

6.20 The Salteye Brook has been the subject of recent division and improvement works. This main river has a demonstrated catchment area as assessed by the Environment Agency covering the northern half of the Port Salford site. The glaciofluvial sand and gravel form a Secondary aquifer which provides a base flow to the Salteye (EA Catchment Mapping). The continued baseflow from the aquifer within the superficial drift beneath the site forms a base flow to the Salteye and in essence ensures constant hydrogeological interconnectivity. This water movement pathway through permeable soils is considered to inhibit the potential for significant saturation or increasing the groundwater table significantly over a prolonged period.

6.21 It is noted that the development proposals intend to create localised areas of improved wetland habitat while retaining the Peat in-situ to ensure carbon remains in the ground.

Natural England position

6.22 Natural England does not consider that sufficient evidence has been provided to demonstrate that detailed scientific, geological, geotechnical and ecological site conditions exist to conclude that restoration is not a realistic possibility, as suggested by the site promoter.

6.23 Natural England considers the location of the site to be important in terms of restoration potential. The statutory Supplementary Advice for Manchester Mosses SAC notes the highly fragmented nature of the SAC, and the need for restoration of the wider peat mass including Chat Moss and the Risley and Holcroft peat extents to underpin the SAC restoration. To date, this has mainly been through opportunities of land acquisition and site ownership by wider partners.

6.24 The Biodiversity Heartland does not infer a higher priority for restoration over other areas of the peat extent, and so Natural England disagree that the site would be of lower priority for potential restoration opportunities. This is demonstrated by the restoration of New Moss Wood which is itself outside Salford Local Authority's defined Biodiversity Heartland. Natural England was involved in the Biodiversity Heartland vision and wish to clarify that the allocation site was omitted from the Biodiversity Heartland because it was, at that time, considered to be an area important for agricultural land and public enjoyment and therefore has no bearing on its restoration potential.

6.25 The site is not on the periphery of the peat mass; it is part of the main body of a 200 Ha wide peat body of and is therefore more than large enough to function as its own hydrological unit.

6.26 It is accepted that the current land use is damaging with high levels of carbon emissions from the existing peat at this location, however, it is still under a

land use that can allow for future restoration and hence a significant reduction in carbon emissions and eventual carbon sequestration. The proposed development across this allocation would result in the peat lost as an asset for good. Peat is an irreplaceable asset for the management of carbon within the City Region and as such its destruction within this location through development would mean less resource across Greater Manchester as a whole. Biodiversity Net Gain is not a suitable mechanism for irreplaceable assets such as deep lowland peat which will support the City Regions net zero ambition

6.27 The potential restoration figures outlined by GMCA demonstrate that Salford has a long way to go in achieving the lower end of the Greater Manchester 5 Year Plan's 50% to 75% restoration target and therefore it is crucial that all of Greater Manchester's peatlands are considered for restoration.

6.28 GMCA has confirmed that that Defra Peat Pilot "was not a prescriptive proposal for certain parcels of land, but rather hypothetical proposals for where land use change could support emissions reductions and what that could look like across the whole of Chat Moss". Therefore, Natural England consider it a misinterpretation of the Pilot to suggest that the scenarios indicate certain parcels of land are preferable for restoration.

6.29 The ability to deliver the relevant criteria in the allocation policy is questioned. Developing on the peat will result in the loss of carbon storage functionality which will not support the objectives of the Great Manchester Wetlands Nature Improvement Area. Biodiversity Net Gain is not a suitable mechanism for irreplaceable assets such as deep lowland peat.

6.30 Whilst no funding has been allocated to restore Port Salford at this time, if the site were to be removed as an allocation for development, it would open up other opportunities for carbon sensitive peat management. There are funding opportunities available to support peat restoration for example Defra Peat Capital Grant, Countryside Stewardship and the new wetter farming scheme, as well as grant schemes such as National Lottery Heritage Fund. There may also be future opportunities for funding through the newly developed Greater Manchester Environment Fund.

7. Conclusion

GMCA overall position

7.1 99% of the Port Salford Extension allocation site area is classified by Natural England / Defra as being comprised of or containing 'deep peaty soils'. However, according to the British Geological Survey there is circa 20% of the allocation which may not be underlain by deep peat (>40cm) or where the peat has been buried under inert fill to form the Boysnope Golf Course. The site promoter has undertaken more detailed ground investigations (which can be submitted to the examination), but these have not been reviewed by

GMCA at this point and are not relied upon to evidence the soundness of the plan.

7.2 Data on the quality of peat is limited although there are a number of sources of potential contamination and other factors such as deep drainage that have led to its degradation. There is no irreplaceable habitat within the allocation boundary.

7.3 Although there is restoration potential, site circumstances including hydrology, presence of neighbouring nationally significant infrastructure and regulatory constraints mean that restoration of the peat would be, at best, extremely challenging. In the wider context of Chat Moss and priorities for its enhancement, restoration of the Port Salford Extension site is considered to be extremely unlikely.

7.4 However, the allocation and development of the site can enable more viable restoration elsewhere within Chat Moss, achieving an overall net gain in peat restoration compared to protecting the site in its current form. In addition, through the masterplanning process there may be the potential to retain carbon storage functions within the developed site through the provision of habitats such as wetlands and marshy grassland.

Peel L&P overall position

7.5 Peel's position, based on evidence presented and the input of technical experts, is that there is no realistic prospect that the peat land at the Port Salford Extension allocation could be restored to self-sustaining bog due to the site specific characteristics outlined in section 2, coupled with a geotechnical engineering analysis. Peel consider that this position is justified by the hydrology, the narrow and fragmented shape of the site and its proximity to infrastructure means.

7.6 Peel's ecological and geotechnical experts advocate that the site specific circumstances should be considered in detail. The prologued anthropogenic influences at the Port Salford site has resulted in the cumulation of numerous factors that will inhibit viable restoration within a 'reasonable time period'. Peel consider that any appraisal of the restoration potential of this specific site, must include consideration of evidence in relation to the site specific characteristics. Without this, Peel consider the appraisal would not be robust.

7.7 Peel acknowledge that more detailed Ground Investigations have been prepared by their experts AECOM since the Regulation 19 version of PfE was published. These have been shared with GMCA during the preparation of the SoCG but Natural England have yet to review them. This supplementary evidence can be added to the examination library if the Inspectors consider this would be helpful.

7.8 Peel is committed to developing the site in such a way that impacts on deep peat are minimised at construction stage. Peel consider that there are several technically proven construction methods available that could be used to

reduce the impact of the proposed development on the peatland through less intrusive construction methods that will result in the consolidation of peat in-situ to mitigate the long-term settlement risk.

7.9 Peel consider that the peat present within the site does not comprise an irreplaceable habitat, that national planning policy context does not preclude the allocation of this site for development on the basis of it containing peat, and that the allocation of the site for development in the context of it containing peat does not present any issues of soundness or legal compliance.

Natural England overall position

7.10 Natural England are the government's statutory advisor on the natural environment and have extensive experience of peat restoration in an upland and lowland context in both an advisory capacity and from a practical restoration perspective,

7.11 The peat on the Port Salford allocation is exceptionally deep. Natural England do not consider that the evidence which they have reviewed to date confirms that it would not be feasible to restore the hydrology of the site and create wetland habitat within site constraints in order to retain carbon, enhance biodiversity and restore to carbon sequestering peat over time.

7.12 Natural England are not aware of any technically proven construction techniques that would minimise the environmental impacts of developing on peat.

7.13 The site is part of a 200Ha wide body of peat and is located within the Great Manchester Wetlands NIA. Natural England consider it is entirely appropriate to compare this particular site with others in the Manchester Mosses SAC and the wider Great Manchester Wetlands NIA.

7.14 The statutory Supplementary Advice for Manchester Mosses SAC identifies the need to restore ecological networks across the wider landscape in order to meet the sites conservation objectives. Natural England therefore considers the site to be situated in an important location for restoration. The proposed development across this allocation would result in the permanent loss of peat which is an irreplaceable asset for the management of carbon within the City Region and is essential in supporting the City Regions net zero ambition.

7.15 There are funding opportunities available to support peat restoration, Defra Peat Capital Grant, Countryside Stewardship and the new wetter farming scheme, as well as grant schemes such as National Lottery Heritage Fund. There may also be future opportunities for funding through the newly developed Greater Manchester Environment Fund.

Area(s) of agreement

7.16 All parties agree to continue to work together going forwards

Signed for Salford City Council on behalf of the nine PfE districts

Name: John Searle
Position: Executive Director of Place
Date: 25/5/23
Signature: [redacted]

Signed on behalf of Peel L&P

Name: Andrew Bickerdike (Turley)
Position: Director
Date: 25th May 2023
Signature: [redacted]

Signed for Natural England

Name: Ginny Hinton
Position: Area Manager – Cheshire to Lancashire Team
Date: 25/05/2023
Signature:
[redacted]