

Places for Everyone Representation 2021

<b>Family Name</b>	Baguley
<b>Given Name</b>	Janet
<b>Company / Organisation</b>	Natural England
<b>Person ID</b>	1286762
<b>Title</b>	Stakeholder Submission
<b>Type</b>	Web
<b>Include files</b>	<a href="#">NE Response 363424 Places for Everyone Joint Development Plan Document.pdf</a>
<b>Family Name</b>	Baguley
<b>Given Name</b>	Janet
<b>Company / Organisation</b>	Natural England
<b>Person ID</b>	1286762
<b>Title</b>	JP-S 2 Carbon and Energy
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	NA
<b>Soundness - Justified?</b>	NA
<b>Soundness - Consistent with national policy?</b>	NA
<b>Soundness - Effective?</b>	NA
<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	NA
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	<p>2.) ADDITIONAL COMMENTS:</p> <p>The following comments relate to matters Natural England consider require improvement but are not matters of soundness or legal compliance.</p> <p>Natural England Peat Concerns</p> <p>Following the publication of the England Peat Action Plan, Natural England has concerns about the strength of the thematic policies in PfE regarding development on peat and its management and feel that the implications in respect of both carbon emissions from development and inappropriate management are under-represented. We are also concerned that the site allocation policies JPA33 New Carrington, JPA29 Port Salford Extension and JPA28 North of Irlam Station have the potential to have irreversible impacts on peat.</p> <p>From England Peat Action Plan</p> <p>We want our peatland to meet the needs of wildlife, people, and the planet. All uses of peatland should keep the peat wet and in the ground. We will work to ensure all our peatlands, not just deep or protected peat, are responsibly managed, or, in good hydrological condition or under restoration management.</p> <p>England"s peatlands are our largest terrestrial carbon store and are vital for capturing and storing carbon. They provide a range of other valuable benefits including biodiversity rich ecosystems, improved water quality and natural</p>

flood management, the protection of historic environment features and connect people with nature.

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<b>Given Name</b>	Janet
<b>Company / Organisation</b>	Natural England
<b>Person ID</b>	1286762
<b>Title</b>	JP-G 1 Valuing Important Landscapes
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	NA
<b>Soundness - Justified?</b>	NA
<b>Soundness - Consistent with national policy?</b>	NA
<b>Soundness - Effective?</b>	NA

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<b>Given Name</b>	Janet
<b>Company / Organisation</b>	Natural England
<b>Person ID</b>	1286762
<b>Title</b>	JP-G 3 River Valleys and Waterways
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	NA
<b>Soundness - Justified?</b>	NA
<b>Soundness - Consistent with national policy?</b>	NA
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<b>Given Name</b>	Janet
<b>Company / Organisation</b>	Natural England
<b>Person ID</b>	1286762
<b>Title</b>	JP-G 4 Lowland Wetlands and Mosslands
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	NA
<b>Soundness - Justified?</b>	NA
<b>Soundness - Consistent with national policy?</b>	NA
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<b>Company / Organisation</b>	Natural England
<b>Person ID</b>	1286762
<b>Title</b>	JP-G 9 A Net Enhancement of Biodiversity and Geodiversity
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	NA
<b>Soundness - Justified?</b>	NA
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<b>Given Name</b>	Janet
<b>Company / Organisation</b>	Natural England
<b>Person ID</b>	1286762
<b>Title</b>	JPA 28: North of Irlam Station
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	NA
<b>Soundness - Justified?</b>	NA
<b>Soundness - Consistent with national policy?</b>	NA
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<b>Given Name</b>	Janet
<b>Company / Organisation</b>	Natural England
<b>Person ID</b>	1286762
<b>Title</b>	JPA 29: Port Salford Extension
<b>Type</b>	Web
<b>Soundness - Positively prepared?</b>	NA
<b>Soundness - Justified?</b>	NA
<b>Soundness - Consistent with national policy?</b>	NA
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<b>Title</b>	JPA 33 New Carrington
<b>Type</b>	Web
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<b>Compliance - Legally compliant?</b>	NA
<b>Compliance - In accordance with the Duty to Cooperate?</b>	NA
<b>Redacted reasons - Please give us details of why you consider the consultation point not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	<p>2.) ADDITIONAL COMMENTS:</p> <p>The following comments relate to matters Natural England consider require improvement but are not matters of soundness or legal compliance.</p> <p>Natural England Peat Concerns</p> <p>Following the publication of the England Peat Action Plan, Natural England has concerns about the strength of the thematic policies in PfE regarding development on peat and its management and feel that the implications in respect of both carbon emissions from development and inappropriate management are under-represented. We are also concerned that the site allocation policies JPA33 New Carrington, JPA29 Port Salford Extension and JPA28 North of Irlam Station have the potential to have irreversible impacts on peat.</p> <p>From England Peat Action Plan</p> <p>We want our peatland to meet the needs of wildlife, people, and the planet. All uses of peatland should keep the peat wet and in the ground. We will work to ensure all our peatlands, not just deep or protected peat, are responsibly managed, or, in good hydrological condition or under restoration management.</p> <p>England's peatlands are our largest terrestrial carbon store and are vital for capturing and storing carbon. They provide a range of other valuable benefits including biodiversity rich ecosystems, improved water quality and natural flood management, the protection of historic environment features and connect people with nature.</p> <p>Following the publication of the England Peat Action Plan and the Greater Manchester (GM) Peat Pilot, Natural England have a better understanding of the impact of carbon loss from damaged and unmanaged peat as well as the opportunity costs of not restoring peat as functioning ecosystem. The GM Peat Pilot showed the carbon storage within lowland peat within GM to be between 1,500 - 2,000 tonnes per hectare CO<sub>2</sub>-e for 50cm depth of peat. At three of the development allocations (New Carrington, Port Salford Extension and North of Irlam Station) the peat is significantly deeper than this. Based on nationally accepted GHG emission estimates, when comparing the estimated CO<sub>2</sub>-e loss from development on degraded lowland peatland against the 7-year offset potential of restoring to near-natural bog, a development would need to restore 19 times the area of the development footprint for each metre of peat depth affected, in order to achieve the stated aim of Net Zero by 2028.</p> <p>Natural England would strongly support maximising the extent of peat omitted from the development footprint of these allocations and highly recommend retaining in situ and using this peat extent as a Carbon Bank and site for Biodiversity Net Gain across these strategic allocations.</p> <p>The vast carbon storage potential of the lowland peat across GM can be secured by restoring the natural hydrological and ecological function of the peat. This requires the conversion to more sustainable practices that allow the peat layer to re-accumulate. This would provide multiple natural capital benefits such as carbon sequestration, flood risk mitigation, enhanced air quality and biodiversity.</p> <p>Natural England has been working with partners to develop restoration methods which effectively restore even the most damaged and dry peat. We</p>

	<p>can restore the peat so it is able to hold water and sequester carbon if it remains in-situ and undeveloped.</p> <p>There is the opportunity to consider and set up a contiguous large area of GM Wetlands Nature Improvement Area as a habitat bank for Biodiversity Net Gain, and for carbon trading. Natural England strongly supports this approach.</p> <p>In summary, we do not support the principle of developing on peat for the reasons stated above and we also have concern regarding the wording within the Plan where it does not fully consider the importance of peat to the delivery of the Local Nature Recovery Strategy, ambitions around Net Zero and the GM 5 Year Environment Plan as well as the Climate Emergency declared by the GMCA.</p>
<b>Family Name</b>	Baguley
<b>Given Name</b>	Janet
<b>Company / Organisation</b>	Natural England
<b>Person ID</b>	1286762
<b>Title</b>	Supporting Evidence
<b>Type</b>	Web
<b>Redacted comment on supporting documents - Please give details of why you consider any of the evidence not to be legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.</b>	<p>1.) MATTERS RELATING TO SOUNDNESS AND LEGAL COMPLIANCE: Habitats Regulations Assessment (HRA)</p> <p>7.1 Air Pollution</p> <p>The HRA has identified potential effects in relation to air quality impacts on Manchester Mosses Special Areas of Conservation (SAC). The Air Quality Assessment report (Ricardo Energy &amp; Environment, Issue 1, 12/07/2021) includes Screening and some preliminary Appropriate Assessment (AA) considerations but concludes that a detailed AA is required. At this stage, the AA is incomplete and the scale of impacts unknown. The availability of appropriate mitigation measures is also unknown. Without this information it is not possible for PfE HRA to conclude that there will be no adverse impact on site integrity as a result of delivering the proposed growth in the Plan and the allocations are at risk of becoming undeliverable if the Habitats Regulations cannot be satisfied.</p> <p>7.3.4 Recreational Disturbance Peak District Moors (South Pennine Moors Phase 1) Special Protected Area (SPA)/South Pennine Moors Phase 2 SPA</p> <p>The HRA has identified potential effects in relation to in-combination recreational impacts on the Peak District Moors (South Pennine Moors Phase 1) Special Protected Area (SPA)/South Pennine Moors Phase 2 SPA/ South Pennine Moors Special Area of Conservation (SAC). Natural England's view is that the recommended mitigation measures require strengthening and the site allocation policies in the Plan need to reflect the measures proposed in the HRA. To address these issues, Natural England advise:</p> <p>-Justification is needed for the 50-house threshold for green infrastructure and designated site information pack requirements. Natural England's Impact Risk Zones use a threshold of 50 houses for individual applications but the PfE HRA should consider in-combination impacts so the threshold should not necessarily be the same.</p> <p>-Natural England support the commitment to develop a Visitor Management Strategy for the South Pennines but advise there is a need for more detail to have sufficient certainty that the mitigation is secure and deliverable. For example, we would expect to see details on the proposed delivery mechanisms, timelines, aims and objectives, partners, and progress to date. The City of Bradford Metropolitan Borough Council has started work on a draft South Pennine Moors SPA/SAC Planning Framework Supplementary</p>



Planning Document. The SPD introduces measures to avoid and mitigate potential recreational disturbance on the South Pennine Moors. This draft can be found here: <https://bradford.oc2.uk/document/9/1389#d1389> You may wish to consider a similar approach in order to address recreational disturbance impacts on the South Pennine Moors SPA & SAC.

-Mitigation measures relating to green infrastructure and designated site information pack requirements should be added to the relevant site allocation policy wording in the Plan.

Without this detail we consider the plan currently unsound with regard to the 'effective' test and we also raise legal compliance issues with regard to the Habitats Regulations.

Natural England will continue to work with Greater Manchester Combined Authority (GMCA) and their appointed consultants as they work towards addressing the issues raised in this response.

## 2.) ADDITIONAL COMMENTS:

The following comments relate to matters Natural England consider require improvement but are not matters of soundness or legal compliance.

The Habitats Regulations Assessment (HRA)

### 7.4 Water Pollution - Available Mitigation and Recommendations

Part of the mitigation proposal suggests that unitary authorities should liaise with United Utilities when preparing their Local Plan to confirm that there is sufficient capacity in the discharge consent to accommodate the growth planned in the PFE. Natural England advise that it would be preferable to confirm capacity as part of the PFE HRA to ensure that the proposed site allocations are deliverable.

Additional mitigation is proposed stating that large-scale site allocation policies in the Plan should include a requirement that developments will not be permitted if they would have an unacceptable effect on water quality. However, not all the large-scale site allocation policies include wording to this effect. Natural England advise that the HRA should identify the relevant policies requiring mitigation for clarity and ensure the policy is updated to reflect this.

### 7.2 Functionally Linked Land

Natural England has no outstanding concerns in relation to functionally linked land but are of the opinion that the evidence supporting the conclusions has not been adequately presented in the report. The bird data and recent survey findings that have been referenced should be included for clarity.

### Integrated Assessment of the Places for Everyone Plan

The Integrated Assessment does not consider potential recreational impacts on the West Pennine Moors Site of Special Scientific Interest (SSSI) as a result of proposed growth in the Plan. Natural England accept that this is not a GM wide issue but advise that this it is given due consideration as part of Bolton and Bury Local Plans.