

# Places for Everyone Joint Development Plan Document

## Statement of Common Ground

### Policy JP Allocation 33 – New Carrington

April 2023

#### 1. Purpose

- 1.1. This Statement of Common Ground (SoCG) has been jointly prepared by Trafford Council on behalf of GMCA, Natural England and relevant site promoters within the New Carrington allocation. This SoCG is in response to the Inspectors Action Point – AP134, in Places for Everyone (PfE) Examination Document IN32.
- 1.2. The relevant site promoters identified for the purposes of this SoCG are those promoting areas of land which are within / partly within the area defined by Natural England as ‘Deep Peaty Soils’ (GMCA59). These relevant site promoters are Burford Carrington, Manchester United Football Club, National Trust, United Utilities and Wain Estates (Carrington) Ltd (formerly HIMOR).
- 1.3. The following table illustrates the amount of land owned by each of the SoCG parties located within the ‘Deep Peaty Soils’ layer (Appendix 1).

Landowner	No. of hectares within the deep peaty soils area (c.397ha <sup>1</sup> )
Burford Carrington	4
Manchester United Football Club	45
National Trust	4
United Utilities	16
Wain Estates (Carrington) Ltd (formerly HIMOR)	300

- 1.4. 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.
- 1.5. Due to time constraints, the following relevant site promoters have not been able to sign this SoCG:
  - National Trust – (Consultee ID 1286836 / Regulation 19 Comment ID-PfE10879)

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<sup>1</sup> Remaining areas of ‘Deep Peaty Soils’ mostly relate to small areas of the site with existing planning permission totalling circa 28ha across multiple ownership, including National Grid and Network Rail

## 2. Background

- 2.1. Historical accounts and maps indicate that the New Carrington allocation contains land (Carrington Moss) which was at one time part of the lowland peat area which stretched across the Mersey Basin.
- 2.2. Carrington Moss is part of series of peatland that spans the Mersey Valley, this includes Manchester mosses and other wetlands that make up the Great Manchester wetland Nature Improvement Area (NIA).
- 2.3. However, Carrington Moss is physically separated from other areas of existing or restored peat habitat. It is severed from 'nearby' peatlands by the River Mersey, Manchester Ship Canal and M62 motorway to the north and the River Glaze to the west.
- 2.4. Much of the area falling within the allocation boundary has been highly modified as a result of agricultural and industrial activities. Most notably, Carrington Moss was used for the deposition of 'nightsoil' (solid waste) from circa 1880, from the City of Manchester, and subsequently used for agriculture. As a result, the site is criss-crossed with drainage ditches often over a metre in depth, with smaller field drains present at regular intervals across the site.
- 2.5. Notwithstanding the above, it is understood that there are areas of peat which lie under existing agricultural land and/or pockets of the original peatland within the proposed allocation.
- 2.6. Deep peat is generally accepted to comprise soils with a peat depth of greater than 0.4m. The depth of peat across the site varies between 0.5 – 2m, with the majority being below 1.5m in depth. As a general principle, deep peat is more likely to be better protected from degradation from agricultural practices and drainage than shallow peat.
- 2.7. The site has also been used to facilitate and accommodate a number of other purposes, which has resulted in New Carrington having a specific set of characteristics and constraints which (taken together) need to be considered and weighed in the balance, including:
  - a) The largescale overlaying of the site with significant quantities of heavily modified nutrient rich topsoil and "nightsoil" from c.1880
  - b) Presence of open ditches across the site to facilitate surface water drainage for agricultural purposes
  - c) Presence of Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS) within the site
  - d) Proximity to the former petrochemical site and the risk of mobilising contaminants
  - e) Presence of overhead electricity lines, high-pressure gas mains and a multifuel oil pipeline within and across the site and need for their ongoing maintenance

### **3. Extent of the peat on the site**

- 3.1. The New Carrington allocation contains an area classified by Natural England (“NE”)/DEFRA as being comprised of or containing ‘Deep Peaty Soils’. Appendix 1 shows the ‘Deep Peaty Soils’ area within the New Carrington allocation, overlaid on the New Carrington Indicative Allocation Plan (PfE JPA33, Map 11.46).
- 3.2. The ‘Deep Peaty Soils’ identified on the NE/DEFRA mapping covers an area of approx. 400ha within the allocation boundary (approx. 35% of the allocation area). Circa 200ha of this is within the area(s) proposed to be retained within the Green Belt as part of the allocation. [GMCA59 - Greater Manchester Peat Map – Great Manchester Mosses NIA](#)
- 3.3. The data underlying the NE ‘Peaty Soils Location (England)’ layer (Appendix 1) was produced by NE 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 data/ layer was subsequently published on 09 July 2021.
- 3.4. The three classes of peaty soils utilised by NE are: Deep Peaty Soils, Shallow Peaty Soils and Soils with Peaty Pockets. There is only deep peaty soil within the New Carrington allocation.
- 3.5. Since the preparation of the initial New Carrington masterplan in 2020, Wain Estates, the majority landowner within the New Carrington Allocation, has commissioned further detailed investigation work on the extent of peat. Appendix 2 shows the inferred extent of peat at New Carrington as a consequence of the detailed investigations (373 boreholes, trial pits etc.), overlaid on the New Carrington Indicative Allocation Plan (PfE JPA33, Map 11.46).
- 3.6. ‘The ‘inferred peat extent’ covers an area of approx. 280 ha within the allocation boundary. Circa 145 ha of this is within the area(s) proposed to be retained within the Green Belt as part of the allocation.
- 3.7. The inferred peat extent is based upon extents shown on historical Ordnance Survey and published geological mapping and has been refined utilising data from extensive ground investigations across the allocation (both historical and those instructed by Wain Estates) on the site. Isolines for peat thickness have been determined through interpolation of reported peat thickness at ground investigation locations using GIS software, with manual assessment where contour lines extend beyond the known maximum extent of peat. The analysis carried out on behalf of Wain Estates provides a more detailed, site specific and up-to-date assessment than the 2008 exercise undertaken by NE/DEFRA.

#### **Area(s) of Agreement**

- 3.8. The NE ‘Deep Peaty Soils’ layer (Appendix 1) is likely to define the main historical extent of peat at New Carrington, whilst the analysis carried out on behalf of Wain Estates provides a more detailed, site specific and up-to-date assessment.

Consequently, in some locations, further ground investigations are required to accurately define the 'inferred peat extent' where there are disparities between the 'Deep Peaty Soils' (Appendix 1) layer and the 'inferred peat extent' (Appendix 2).

- 3.9. Other smaller pockets of peat may exist within the allocation; however their exact location and depth is unknown.
- 3.10. This statement is agreed by Trafford Council, Natural England, United Utilities and Wain Estates (Carrington) Ltd (formerly HIMOR).
- 3.11. At this point in time and without undertaking their own survey work, the following landowners: Manchester United Football Club and Burford Carrington are unable to comment specifically on the extent of the peat but have no reason to doubt the data that has been provided by Natural England/DEFRA and Wain Estate's professional consultants.

#### **4. Quality of the peat**

- 4.1. There is very limited site-specific information from NE/DEFRA on the 'quality' of the peat at New Carrington. The only data published by NE/DEFRA, is that shown on the 'Deep Peaty Soils' layer based on 2008 data and high-level historical soil maps and information, which was published in 2021.
- 4.2. The analysis carried out on behalf of Wain Estates provides a more detailed, site specific and up-to-date assessment than the 2008 exercise undertaken by NE/DEFRA. Relevant documents include [GMCA62 - All ground investigation locations JPA33 New Carrington](#), [GMCA63 - GI locations where peat reported JPA33 New Carrington](#) and [GMCA64 - Peat descriptions summary table for GI locations where peat reported JPA33 New Carrington](#).

#### **Areas of Agreement**

- 4.3. The peat within the New Carrington allocation has been heavily modified by previous industrial and agricultural activities causing degradation of the majority of peat within the site. Most of the existing degraded peat has been drained and as such is currently very likely to be emitting its stored carbon as carbon dioxide (CO<sub>2</sub>). Consequently, the formation of new peat has largely ceased, and it is therefore not considered to be an active peat bog.
- 4.4. Notwithstanding the above, there are likely to be areas within the site where the quality of the peat is better (not as degraded and/or wetter) including some SBIs.
- 4.5. This statement is agreed by Trafford Council and Natural England.
- 4.6. Wain Estates (Carrington) Ltd (formerly HIMOR) agree with paragraphs 4.3 and 4.4 of this statement.
- 4.7. At this point in time and without undertaking their own survey work, the following landowners: Manchester United Football Club, Burford Carrington and United Utilities are unable to comment specifically on the quality of the peat but have no

reason to doubt the data that has been provided by Natural England/DEFRA and Wain Estate's professional consultants.

#### **Area(s) of Disagreement**

- 4.8. Wain Estates disagree with paragraph 4.5 and consider that the areas where the quality of the peat is better (not as degraded and/or wetter) are limited to Birch Moss Covert SBI and the southern part of the Wetland at Carrington Moss SBI (locally known as the Shell Pool Reserve).

### **5. Potential for Restoration**

#### **Area(s) of Agreement**

- 5.1. It is likely that with sufficient resources, money, and time, it would be technically possible to restore the 'Deep Peaty Soils' within the New Carrington allocation to wetland fen and wet woodland habitats, typically associated with lagg areas on the edge of mosslands which overlie peat. Over decades they may begin to transition to active bog as nutrient resources gradually diminish.
- 5.2. This statement is agreed by Trafford Council, Natural England, Burford Carrington, United Utilities and Wain Estates (Carrington) Ltd (formerly HIMOR).
- 5.3. At this point in time and without undertaking their own survey work, Manchester United Football Club are unable to comment specifically on the potential and likelihood of restoration of the peat but have no reason to doubt the data that has been provided by Natural England/DEFRA and Wain Estate's professional consultants.

#### **Area(s) of Disagreement**

- 5.4. Parties disagree the extent which this is achievable and likely, particularly with regards to the site-specific constraints and characteristics, amount of resources, money, and time required.

### **Trafford Council Position on behalf of the nine PfE districts (GMCA)**

#### Potential for Restoration

- 5.5. 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.
- 5.6. However, approximately 200ha of land within the 'Deep Peaty Soils' will be retained within the Green Belt and remain undeveloped. There are also eight SBIs within the allocation, which have policy protection from development. Together, these offer a significant opportunity to create wetland and/or raised peat bog steppingstone habitats, which will significantly reduce the amount of CO<sub>2</sub> currently being emitted.
- 5.7. In this regard, it must be noted that the prevention of CO<sub>2</sub> being emitted from the drained and degraded peat does not require restoration to active peat bog.

Locking in the stored carbon can be achieved through re-wetting, as would be achieved through wetland habitat creation.

- 5.8. It is therefore considered that as part of the development of the proposed allocation, there will remain sufficient opportunity within the retained Green Belt to create wetland habitats and/or restore pockets of peat habitat preventing stored carbon being emitted as CO<sub>2</sub>, whilst balancing other needs, constraints and planning considerations.
- 5.9. Policy JPA33 as proposed to be amended in [GMCA85](#), includes various policy requirements in relation to peat, which will facilitate any peat habitat restoration and/or wetland habitat creation within this area where appropriate and feasible.

#### Likelihood of Restoration

- 5.10. Taking into consideration the site-specific set of characteristics and constraints outlined in section 2 of this SoCG, it is not considered that full restoration of the peat or extensive wetland creation is likely within a reasonable timescale.
- 5.11. The site is in multiple private ownerships (see paragraph 1.2) and there is no comprehensive plan to restore the peat or sell land to facilitate this. Moreover, no approaches have been made to acquire this land from the current landowners to enable restoration.
- 5.12. There is currently no plan published or funding allocated (public or private) to restore the deep peaty soils area to active peat bog or create a wetland habitat.
- 5.13. However, it is considered that the proposed allocation together with the proposed amendments to Policy JPA33 set out in GMCA85 and Policy JP-G4' Lowland wetlands and mosslands' could facilitate peat restoration and/or wetland habitat creation within the retained Green Belt area and SBIs etc., where this is feasible.
- 5.14. Criterion 1 of the policy requires the production and approval of a masterplan which must include a phasing and delivery strategy in partnership with key stakeholders, which will assist in mitigating the impact(s) on peat. This will further be enabled by the policy requirements of the 'Natural Environment' sub-section of the policy.
- 5.15. Notwithstanding the above, it is important to note that the New Carrington allocation is integral to the PfE Spatial Strategy and it will have a key role in sustaining southern competitiveness (JP-Strat 9 and JP-Strat 11); one of the four key strands of the spatial strategy.
- 5.16. The development will make a sizeable contribution towards the housing and employment land supply for Trafford and Greater Manchester, and will have a positive role in addressing local socio-economic challenges for existing communities in Carrington, Partington and Sale West, helping to shape a new economic future for the area.

## **Natural England Position**

### Potential for Restoration

- 5.17. It is likely that with sufficient resources, money, and time, it would be possible to restore the 'Deep Peaty Soils' within the New Carrington allocation so that they are no longer emitting carbon and can start to sequester new carbon.
- 5.18. NE's approach to restoration would be to only restore steppingstones of the site to bog, focused on locations where relic habitat is present. 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. It would be entirely feasible to restore the hydrology of the site and create wetland habitat in order to retain carbon, enhance biodiversity and restore to carbon sequestering peat over time.
- 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. It is NE's view that creation of wetland habitat could be achieved within 5-10 years, and within the specific site constraints using low-cost bunding methodologies. Restoration to active bog would take significantly longer.

### Likelihood of Restoration

- 5.20. NE has experience of successfully restoring wetland habitats on sites with similar constraints, where significant resources, costs and/or engineering works were not required.
- 5.21. Whilst no funding has been allocated to New Carrington, there are funding opportunities available to support peat restoration including National Lottery grants, Defra peat capital grant, Countryside Stewardship and the new wetter farming scheme, as well as grant schemes such as through National Lottery Heritage Fund and as seen with the purchase of Moss Side Farm by Natural England.

## **Burford Carrington Position**

### Potential for Restoration

- 5.22. Burford Carrington have not carried out any specific peat studies in relation to their land ownership. However, the Burford Carrington land has a long history of industrial use providing the rail access and rail siding storage to facilitate coal deliveries to the former Carrington Power Station. Whilst this activity has ceased the land remains industrial in nature.

### Likelihood of Restoration

- 5.23. The Burford Carrington land has a long history of industrial use and the likelihood of restoring the peat within the area formerly used for railway lines is thought to be low unless part of a comprehensive plan working with Wain Estates and Trafford Council.

- 5.24. However, the cost of land restoration and the loss of this north south industrial land corridor would not be feasible or desirable.

### **Manchester United Football Club Position**

- 5.25. At this point in time and without undertaking their own survey work, Manchester United Football Club are unable to comment specifically on the potential for peat restoration and the likelihood of this being achieved.

### **United Utilities Position**

#### Potential for Restoration

- 5.26. United Utilities has no information that contradicts the assessment on the potential for peat restoration that has been prepared for Wain Estates.
- 5.27. From recent ground investigation surveys commissioned by United Utilities on their land, significant areas of made ground across the site were identified, varying in depths of between 1.4 and 3.2m, below which was located superficial glaciofluvial deposits comprising sand, gravel, silt and clay. No peat was recorded in any of the boreholes or trial pits. On the eastern part of the site was a solid slab of slag and clinker within the made ground deposits.
- 5.28. Ground gas monitoring has indicated elevated concentrations of CO<sub>2</sub>, and parts of the site demonstrate elevated concentrations of heavy metals and other contaminants. This is expected to be from the extensive area of historical waste disposal on the site. This tipping / land fill took place following the closure of the former sewage works (and associated sludge beds) in the late 1970's and 1980's. The surveys identified potentially hazardous material with a range of existing and potential receptors. Remediation is assumed to be required, but there is nothing to indicate that this is not technically possible to support residential development.
- 5.29. Given the above it is considered that there is no potential for peat restoration on United Utilities land because either peat does not exist, or because any other small area(s) of peat is current operational land, either in active use as part of the operational Altrincham WwTW (Wastewater Treatment Works) or is likely to be required for such use in the future.

#### Likelihood of Restoration

- 5.30. Improvements to the WwTW are likely to be necessary to provide additional capacity to meet the needs arising from this development (as well as meeting existing needs and future environmental drivers).
- 5.31. Consequently, the likelihood of any peat restoration is unlikely within United Utilities land owing to the need for likely additional improvements and/or expansion of the WwTW together with the significant presence of made ground and associated remediation that would be required. It should be noted that if there is to be any restoration of peat in the wider area that this should ensure no detriment to the operation of existing water and wastewater assets. Access to these assets must be maintained for maintenance, repair and replacement.

Therefore the location and details of any peat restoration will need to be first agreed with United Utilities where it is in an area that could affect their assets (e.g. to ensure access to assets is maintained and that there is no detriment to their operation).

### **Wain Estates (Carrington) Ltd Position**

- 5.32. Wain Estates agree with the position of Trafford Council as set out at paragraphs 5.5 – 5.9 regarding the potential of restoration, subject to the following additional points.

#### Potential for Restoration

- 5.33. Wain Estate's consider that large scale restoration of the deep peaty soils area to active peat bog is unlikely to be feasible, within a reasonable timescale. It is considered that given the highly modified and enriched nutrient regime which has been present for over 140 years, restoration of the peat to active bog with sphagnum mosses and other typical peat forming plants would not be realistic and would require significant engineering works to ensure that the locally changed groundwater regime does not impact on adjacent land owners and the existing buried utilities. The closest to active peat bog that could be achieved would be to remove the topsoil and create wetland fen and wet woodland habitat. These are typically associated with the areas on the edges of mosslands which overlie peat. These wetlands would not offer the same carbon sequestration potential as peatlands. Whilst such habitat may begin to transition to active bog as nutrient resources gradually diminish, this process would take a very significant amount of time given the current conditions.
- 5.34. Wain Estates consider that full restoration of the peat or extensive wetland creation would require a number of actions which would consume significant resources, including:
- a) Removal of large quantities of heavily modified nutrient rich topsoil and 'nightsoil'
  - b) Significant engineering works to raise and maintain groundwater levels
  - c) Surface water drainage across the site would need to be altered to ensure raising levels in on area does not adversely affect adjacent uses
  - d) Preventing the risk of mobilising contaminants from the former petrochemical site into the groundwater and protected environments.
  - e) Engineering works to existing significant infrastructure and / or diversion due to raising water levels
- 5.35. Based on a detailed understanding of the ground conditions, contamination and hydrology at the site, Wain Estates do not consider that these constraints can be overcome through low cost bunding techniques.
- 5.36. Therefore, Wain Estates agree with the Trafford Council that full restoration of the peat or extensive wetland creation is unlikely to be feasible.

- 5.37. In relation to the proposed amendments to Policy JPA33 at GMCA85, at the hearing Trafford Council expressly agreed to Wain Estate's proposed addition to the policy wording relating to peat under criterion 32. The agreed additional wording was:

*Minimise the loss of the carbon storage function of peat and any adverse impacts on the hydrology of undeveloped areas of the allocation, which could facilitate the restoration of peat subject to a prior assessment as to whether peat can feasibly be restored in those areas.*

- 5.38. However, this wording does not appear to have been included in the revised policy wording at GMCA85.
- 5.39. Wain Estates consider the inclusion of this wording is essential because as currently drafted the policy appears to raise a presumption that the peat can be restored. The additional wording would allow the potential for wetland creation to be properly considered through subsequent masterplanning and/or planning applications as part of an overall biodiversity net gain strategy, alongside other measures to lock in stored carbon such as construction techniques (e.g., soil stabilisation).
- 5.40. Provided that the agreed wording is included within the policy, Wain Estates consider that the policy provisions relating to peat would be effective.

#### Likelihood of Restoration

- 5.41. Wain Estates agree with the position of Trafford Council as set out at paragraphs 5.10 – 5.16 regarding the likelihood of restoration, subject to the following additional points:
- 5.42. Notwithstanding the absence of any current funding, it is not realistic to assume that Wain Estates would release the land or allow it to be re-wet in the terms envisioned by Natural England if the allocation does not come forward. As a responsible landowner, Wain Estates must protect its assets with regard to the significant contamination, groundwater and infrastructure issues at the former petrochemical site.

## **6. Conclusion**

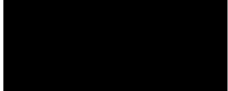
- 6.1. All parties agree to continue to work together going forwards.

**Signed for Trafford Council on behalf of the nine PfE districts**

**Name:** Richard Roe

**Position:** Director of Place

**Date:** 28 April 2023


**Signature:** 

**Signed for Natural England**

**Name:** Ginny Hinton

**Position:** Area Manager – Cheshire to Lancashire Team

**Date:** 28 April 2023

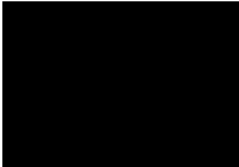
**Signature:** 

**Signed for Burford Carrington**

**Name:** Patrick Anderson

**Position:** Asset Manager

**Date:** 28 April

**Signature:** 

**Signed on behalf of Paul Butler Associates for Manchester United Football Club**

**Name:** Tom Flanagan

**Position:** Director at Paul Butler Associates.

**Date:** 28 April 2023

**Signature:** 

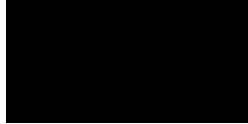
**Signed on behalf of Lichfields for United Utilities**

**Name:** Simon Pemberton

**Position:** Senior Director, Head of Manchester Office

**Date:** 28 April 2023

**Signature:**



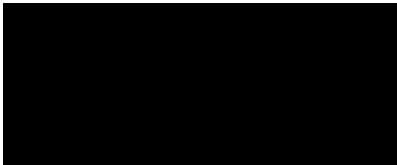
**Signed on behalf of Emery Planning for Wain Estates**

**Name:** John Coxon

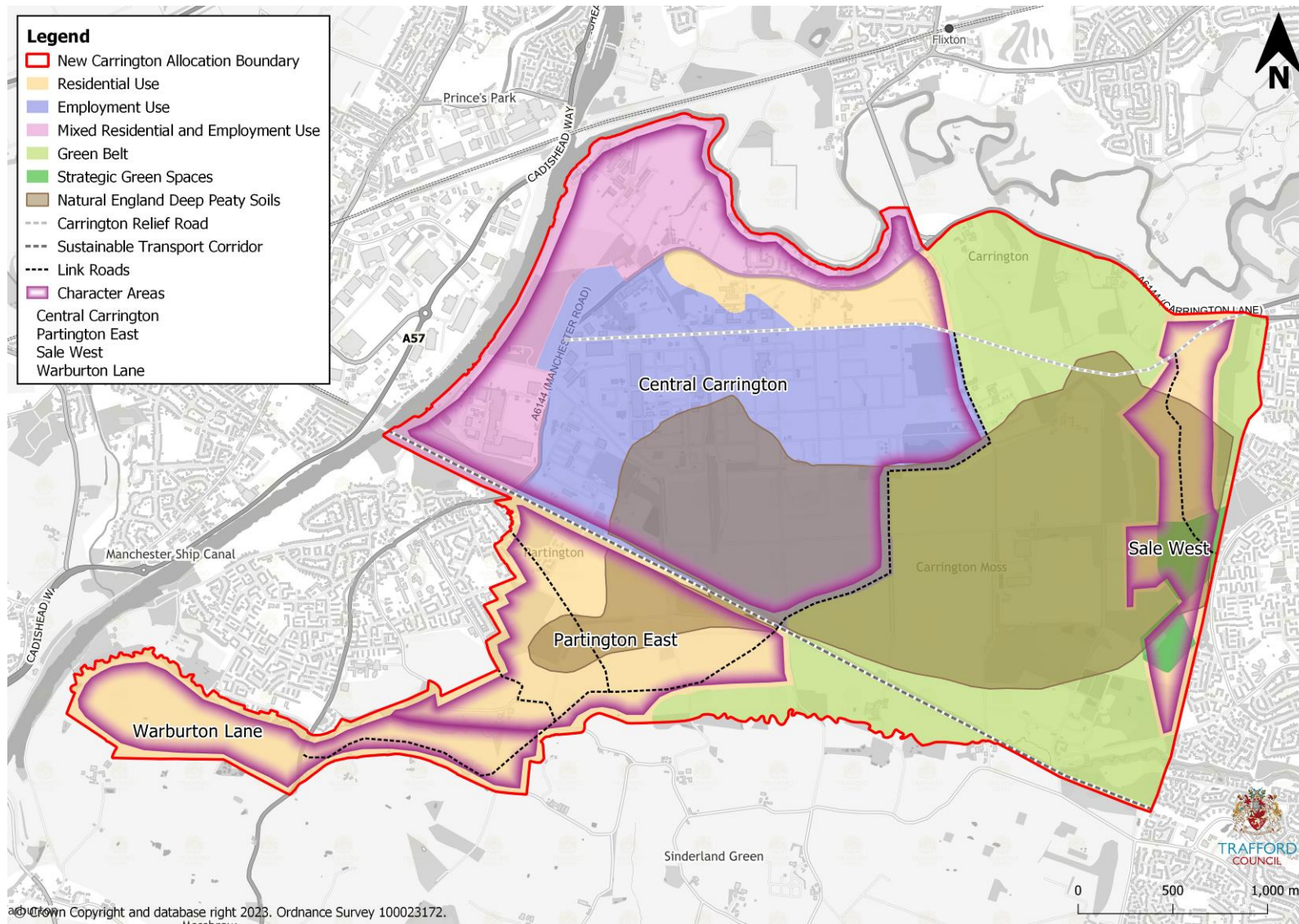
**Position:** Director

**Date:** 28 April 2023

**Signature:**



## Appendix 1: New Carrington Allocation Policy Plan with Natural England Deep Peaty Soils data



## Appendix 2: New Carrington Allocation Policy Plan with inferred peat extent from Wain Estates investigations

