

Date: 08 October 2025
Our ref: 525921
Your ref: 143085/FO/2025



Sue Wills
Manchester City Council

BY EMAIL ONLY

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Sue Wills,

Planning consultation: 143085/FO/2025 – Erection of 106 no. residential dwellings (C3 Use Class) with associated access, landscaping, parking and other works

Location: Land At Hinchley Road Manchester M9 7FG

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Since our previous response (521204, dated 28 July 2025), Natural England have been approached by consultants working on the proposal and Manchester City Council on 28 August 2025 in regard to potential peat deposits within the Application Site. As such Natural England wish to update our advice in light of this material. For clarity, Natural England have no concerns with designated sites and welcome the opportunity to discuss matters further.

SUMMARY OF NATURAL ENGLAND'S ADVICE

FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON PEAT

As submitted, the application could:

- Have potential significant effects to peat
- Be unable meet the peat policy requirements of Places for Everyone

Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation.

The following information is required:

- Sensitive construction methods to leave peat in-situ
- Peat management plan
- On-site habitat provision which makes best use of peat needing re-use

Without this information, Natural England may need to object to the proposal. Please re-consult Natural England once this information has been obtained.

Background to Peat Concerns

Natural England do not support development (or extraction) of peat. Natural England highlight for peat to meet the definition of restorable; the presence of bog related species are not required.

Under section 243 of the [Inspector's findings](#) for Places for Everyone, it is stated that in principle, therefore, we agree with Natural England that deep peat that is capable of being restored with human intervention (i.e. that which has not been "destroyed") within the allocations can meet the NPPF definition of an irreplaceable habitat due to its age and rarity. Development on peat at this location may not align to adopted planning policy within Places for Everyone such as Policy JP-G4: Lowland Wetlands and Mosslands.

Application Site Peat Concerns

Peat is found within the northern region of the Application Site and is a small fragment of the edge of a peat mass, largely already lost to development. This combined with the shallow depth of the peat and its proximity to roads and buildings etc would make this site more difficult to re-wet. The focus on the Application Site should be the protection of peat in the ground and correct re-use of peat. Reuse of peat should not be used to enhance soil fertility as this would not help to reduce carbon emissions and would result in further oxidation.

Construction Techniques

Natural England are of the opinion that it is necessary to use suitable construction techniques to minimise any potential impacts to peat and leave peat in-situ. We advise reference to wider Places for Everyone allocations within the Inspector's Findings which have also adopted this approach.

In addition, we advise that an appropriately experienced peat specialist is utilised who can advise on, and supervise soil (including peat) handling, including identifying when soils can be handled and how to make the best use of soils on site. This must be captured in a Peat Management Plan which details how peat will be left in-situ, the handling of peat extracted, peat volume estimates, excavation methods, storage, reuse, and monitoring.

Natural England strongly recommend where there is an ultimate need for peat to be extracted, this is re-used on-site. This peat can be used to provide biodiversity opportunities.

Re-Use of Peat in Landscaping and Biodiversity Enhancement

To support the objectives of Policy JP-G8: A Net Enhancement of Biodiversity and Geodiversity which also refers to Great Manchester Wetlands Nature Recovery Network, Natural England highlight habitat provision should consider the presence of peat and include provisions for wetland enhancement. Habitats may include wetland associated habitats such as wet/marsh grassland mixes, bogland, marsh, fen and reed which would be more appropriate to the peat conditions.

Additional Advice

Local Nature Recovery Strategies

Draft LNRSs can be used to inform opportunities for nature recovery where development is planned. The LPA should decide if there is evidence that the applicant has reviewed the site relevant Priorities and Actions (Measures) in the draft GM LNRS (available for download [here](#)); including those mapped in and adjacent to the site for which they are applying for permission, to inform opportunities for nature recovery (see below for mapping information). If not, then where the LPA considers it would be appropriate to do so, they could request that the applicant takes account of relevant Actions in their design of the site to contribute to nature recovery.

Site relevant Actions in the Greater Manchester Local Nature Recovery Strategy relevant to this site are listed below with a map of the overall GM LNRS Nature Network opportunity sites showing in relation to the application site; further habitat type detailed maps are available on the GM Nature Network mapping: [Greater Manchester Nature Network Map](#).

The Actions are mapped within and adjacent to the site and could help to inform whether the application sufficiently considers nature recovery in its design. Where actions are mapped within the

site, the applicant can benefit from strategic *significance uplift* in Defra's Biodiversity Net Gain (BNG) Metric if they are delivering the relevant Action (Measure).

Biodiversity Net Gain

Development should provide net gains for biodiversity in line with the NPPF paragraphs 187(d), 192 and 193. Major development (defined in the [National Planning Policy Framework \(publishing.service.gov.uk\)](https://www.gov.uk/government/publications/national-planning-policy-framework-glossary) glossary) is required by law to deliver a biodiversity gain of at least 10% from 12 February 2024 and this requirement is also applies extended to small scale development from April 2024.

[Biodiversity Net Gain](https://www.gov.uk/government/publications/biodiversity-net-gain-guidance) guidance (gov.uk) provides more information on biodiversity net gain and includes a link to the [Biodiversity Net Gain Planning Practice Guidance](https://www.gov.uk/government/publications/biodiversity-net-gain-planning-practice-guidance) (gov.uk).

The statutory biodiversity metric should be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. We refer you to [Calculate biodiversity value with the statutory biodiversity metric](https://www.gov.uk/government/publications/calculate-biodiversity-value-with-the-statutory-biodiversity-metric) for more information. For small development sites, [The Small Sites Metric](https://www.gov.uk/government/publications/the-small-sites-metric) may be used. This is a simplified version of the statutory biodiversity metric and is designed for use where certain criteria are met.

The mitigation hierarchy as set out in paragraph 193 of the NPPF should be followed to firstly consider what existing habitats within the site can be retained or enhanced. Where on-site measures are not possible, provision off-site will need to be considered.

Where off-site delivery of biodiversity gain is proposed on a special site designated for nature (e.g. a SSSI or habitats site) prior consent or assent may be required from Natural England. More information is available on [Sites of Special Scientific Interest: managing your land](https://www.gov.uk/government/publications/sites-of-special-scientific-interest-managing-your-land)

Development also provides opportunities to secure wider biodiversity enhancements and environmental gains, as outlined in the NPPF (paragraphs 8, 77, 109, 125, 187, 188, 192 and 193). Opportunities for enhancement might include incorporating features to support specific species within the design of new buildings such as swift or bat boxes or designing lighting to encourage wildlife.

[The Environmental Benefits from Nature Tool - Beta Test Version - JP038 \(naturalengland.org.uk\)](https://www.naturalengland.org.uk/Tools/Environmental-Benefits-from-Nature-Tool-Beta-Test-Version-JP038) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory biodiversity metric.

[Natural environment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/natural-environment) provides further information on biodiversity net gain, the mitigation hierarchy and wider environmental net gain.

If you have any queries relating to the advice in this letter please contact consultations@naturalengland.org.uk.

Should the applicant wish to discuss the further information required and scope for mitigation with Natural England, we would be happy to provide advice through our [Discretionary Advice Service](https://www.naturalengland.org.uk/Tools/Discretionary-Advice-Service).

Please consult us again once the information requested above, has been provided.

Yours sincerely,


Planning Casework Officer
Cheshire, Greater Manchester, Merseyside & Lancashire Area Team