Date: 13th October 2025
Reference: 17-994-L4

HINCHLEY ROAD – BLAKELEY, MANCHESTER
PEAT MANAGEMENT PLAN

Project	Hinchley Road, Brackley
Client	Miller Homes
E3P Project No.	17-994
Planning Application	143085/FO/2025
Subject	Peat Management Plan
Author	Martin Dyer

1. INTRODUCTION

This technical report has been prepared by E3P on behalf of Miller Homes in response to consultation comments received from Natural England dated 28 August 2025 concerning the presence of peat soils at the Hinchley Road site. It supplements the previously submitted Peat Assessment Report prepared by E3P (ref. 17-994-L3, dated 3rd September 2025).

The objective of this addendum is to:

- Confirm the extent and volumes of peat present on the site.
- Outline sensitive construction techniques to minimise peat disturbance.
- Provide a Peat Management Plan setting out excavation, handling, storage, reuse and monitoring measures.
- Demonstrate how the development aligns with the requirements of Places for Everyone policies JP-G4 and JP-G8, the National Planning Policy Framework (NPPF), and Natural England's guidance.

1.1. SUMMARY OF ORIGINAL PEAT ASSESSMENT

The original E3P Peat Assessment established the following baseline:

- Peat deposits were encountered in the northern sector of the site at depths of between 0.20 m and 0.80 m below ground level (bgl), with typical thicknesses of less than 0.50 m, and occasional depths up to 0.80 m.
- Total peat volume was initially estimated at approximately 4,434 m³.
- The peat deposits were confirmed to be heavily degraded, drained, and lacking sphagnum or other peat-forming vegetation.
- The site was classified as a degraded raised lowland bog rather than a blanket bog, and therefore does not meet the NPPF definition of an irreplaceable habitat.
- Restoration potential was judged to be negligible due to drainage, surrounding urban development, and ecological degradation.

1.2. UPDATED PEAT QUANTIFICATION

Following further analysis, peat volumes have been recalculated to refine previous estimates. The revised maximum volume of peat present on the site is 4,275 m³. This has been apportioned as follows:

- Peat retained in-situ: approximately 714 m³ located in the northern part of the site, where development layout allows retention.
- Peat requiring excavation: approximately 3,561 m³.

Of the excavated peat, approximately 3,000 m³ can be re-used within the residential garden plots, which collectively total 8,217 m² across the development. This allows incorporation of peat at an average depth of 0.45 m.

The remaining 561 m³ will be reused in landscape and habitat creation areas within the development.

The materials management strategy will work to ensure the retention of peat on-site to promote and enhance sustainability.

2. PEAT MANAGEMENT PLAN (PMP)

To satisfy Natural England's requirements, a Peat Management Plan will be implemented and supervised by a suitably qualified peat specialist. The key elements of the PMP are:

2.1. EXCAVATION AND HANDLING

Excavation will be undertaken in controlled phases using low ground pressure plant to minimise compaction and structural damage.

Peat will be excavated in thin layers to preserve its structure.

Where viable, handling will be limited to dry weather conditions to reduce smearing and desiccation.

Mineral soils will be kept separate from peat to avoid cross-contamination.

2.2. TEMPORARY STORAGE

Any temporary stockpiles will be less than 3m in height to reduce self-weight consolidation and oxidation (where viable).

Stockpiles will be located in designated, low-risk areas away from drainage lines.

If storage exceeds three months, stockpiles will be seeded with grass to prevent erosion.

Moisture content will be monitored and, where necessary, peat will be dampened to prevent drying and degradation.

2.3. REUSE STRATEGY

The peat management strategy for the Hinchley Road site has been developed to maximise the retention and beneficial use of peat resources within the physical and design constraints of the proposed residential development. Retention of peat in-situ has been prioritised wherever practicable, with approximately 714 m³ preserved in its current position.

Where excavation is unavoidable due to essential construction requirements, peat will be carefully managed, stored, and re-used across the site, ensuring that all identified deposits are either retained or incorporated into gardens, landscaping and habitat creation areas.

This approach balances the protection of peat soils with the delivery of the development and ensures compliance with local planning policy and Natural England guidance.

- ~3,000 m³ will be incorporated into residential garden areas, producing organic-rich soils at approximately 0.45 m depth (as permitted by the development scheme).
- 714 m³ will remain in situ, preserving peat in its current position within the confines of the required development infrastructure works.
- 561 m³ will be placed within landscaped areas, with specific use in the creation of wet grassland and marsh planting zones, and for forming organic cover soils in public open space.

2.4. MONITORING AND AFTERCARE

Volumes of peat excavated, stockpiled and reused will be logged by the site engineer and E3P as the independent specialist.

Compliance checks will be carried out at key construction stages.

Due to the nature of the engineering works, the plan will need to be dynamic and adaptive.

2.5. SENSITIVE CONSTRUCTION TECHNIQUES

To minimise disturbance and carbon loss, the following measures will be applied during construction:

- Limiting the footprint of excavation to only those areas required for foundations and infrastructure services.
- Avoid the use of heavy tracked plant in peat zones unless fitted with wide tracks or bog mats.
- Preventing unnecessary drying by promptly reusing excavated peat.
- Phased working to reduce the volume of peat exposed at any one time.

2.6. ON-SITE HABITAT PROVISION

The reuse of peat will be directed to support biodiversity objectives in accordance with Policy JP-G8 and the Greater Manchester Wetlands Nature Recovery Network. Specific measures include:

- Integration of peat into residential gardens as organic-rich soils, supporting low-input planting and sustainable garden design.
- Incorporation of peat into landscape bunds and naturalised planting areas to improve soil organic matter and support habitat establishment.

3. POLICY COMPLIANCE

The updated assessment and management proposals ensure full compliance with the following policies and guidance:

- JP-G4 (Lowland Wetlands and Mosslands): Peat will be retained in-situ where feasible, with all remaining peat excavated, carefully managed and reused within the development site.
- JP-G8 (Net Enhancement of Biodiversity and Geodiversity): Reuse of peat will directly support the creation of appropriate wetland and grassland habitats, contributing to biodiversity net gain.
- NPPF: The site does not meet the definition of an irreplaceable habitat. The mitigation hierarchy has been followed by avoiding peat disturbance where possible, minimising unavoidable impacts through sensitive construction, and delivering mitigation through on-site reuse.
- Natural England Guidance: All peat will be retained and reused on-site, with a Peat Management Plan in place to ensure correct handling and long-term monitoring.

4. CONCLUSION

This report demonstrates that peat on the Hinchley Road site has been quantified, assessed and incorporated into a robust management plan. The approach ensures that:

- A maximum peat volume of 4,275 m³ has been identified.
- 714 m³ will be retained in-situ.
- 3,000 m³ will be reused in residential garden soils.
- 561 m³ will be directed to landscape and habitat creation areas.

Sensitive excavation and handling techniques will minimise disturbance and carbon emissions.

The Peat Management Plan will govern all aspects of excavation, storage, reuse and monitoring.

On-site habitat provision will be designed to align with biodiversity net gain requirements and the Greater Manchester Wetlands Nature Recovery Network.

Accordingly, the development fully addresses the issues raised by Natural England, ensures responsible peat management, and demonstrates compliance with local and national planning policy.

Martin Dyer
Director
BSc (Hons), CGeol, CEnv, FGS, FIEncSci.

e3p

Mobile: **07932 731 080** | Office: **0161 707 9612** | Mobile: 07931 245 276 | Office: 0161 707 9612 | **Manchester Office** - Taylor Road, Urmston, M41 7JQ | **Midlands Office** – Lifford Lane, Birmingham, B30 3JH

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APPENDIX A: PEAT MANAGEMENT PLAN (PMP)

Site: Land at Hinchley Road, Manchester, M9 7FG
Planning Reference: 143085/FO/2025
Prepared by: E3P
Date: October 2025

1. INTRODUCTION

This Peat Management Plan (PMP) sets out the strategy for the excavation, handling, temporary storage, re-use, monitoring and aftercare of peat soils at the Hinchley Road development site. The PMP has been prepared in response to consultation comments received from Natural England in August 2025 and should be read alongside the E3P Peat Assessment Report (September 2025) and subsequent Addendum Report (October 2025).

The purpose of the PMP is to ensure that peat present within the site is managed in accordance with best practice. The strategy seeks to maximise in-situ retention wherever possible, reduce environmental impacts, minimise carbon emissions, and ensure that excavated peat is reused on site to provide landscaping and biodiversity benefits.

2. OBJECTIVES

The overarching objective of this plan is to ensure that peat is treated as a sensitive and finite resource. The strategy aims to minimise the volume of peat disturbed by development, and where disturbance is unavoidable, ensure that handling and storage is conducted in a manner that prevents degradation. All peat removed from the ground will be reused within the site boundary, with applications designed to create soil improvements and ecological enhancements.

The PMP therefore not only addresses regulatory and policy requirements, but also contributes to biodiversity net gain in line with the National Planning Policy Framework and Places for Everyone policies JP-G4 and JP-G8.

3. PEAT VOLUMES AND DISTRIBUTION

Investigations undertaken by E3P confirmed that peat is present in the northern sector of the site at depths ranging from 0.2 m to 0.8 m below ground level, with most deposits being less than 0.5 m thick. The maximum volume of peat across the development has been calculated at 4,275 m^3. Within this total, 714 m^3 can be preserved in-situ beneath green infrastructure and non-intrusive development areas. The remaining 3,561 m^3 will require excavation to facilitate the construction of dwellings, roads and associated infrastructure.

A reuse strategy has been developed to maximise the retention of excavated material on site. Of the total, 3,000 m^3 will be incorporated into 8,217 m^2 of residential garden areas, which provides an average incorporation depth of approximately 0.45 m. The balance of 561 m^3 will be directed into landscaping features, open space soils and dedicated habitat creation areas.

The retention and re-use of peat will be optimised, thereby ensuring compliance with the avoidance principles of Policy JP-G4.

4. ROLES AND RESPONSIBILITIES

The responsibility for implementing this PMP rests with the Principal Contractor, who will ensure that all peat handling is carried out in accordance with the plan.

The Site Manager will be tasked with ensuring all site operatives are briefed through toolbox talks on peat sensitivity and the need for careful handling.

A peat specialist will be appointed to supervise excavation, storage and reuse activities, with authority to halt works if protocols are not being adhered to.

The E3P Environmental Engineer will maintain oversight of compliance and provide technical support, including the preparation of monitoring reports. F

inally, the landscape contractor will ensure that peat is correctly incorporated into gardens, open space soils and habitat areas in line with the agreed reuse strategy.

5. EXCAVATION AND HANDLING PROTOCOLS

Excavation will be carefully phased to minimise the exposure of peat soils to air and weathering.

Works will be restricted to the minimum footprint necessary to facilitate development.

Peat will be stripped in thin layers to preserve structure, with handling restricted to periods of suitable weather to minimise smearing and degradation.

Wherever practicable, excavated peat will be moved directly to its final placement area, reducing the need for temporary stockpiling. Under no circumstances will peat be mixed with mineral soils.

6. TEMPORARY STORAGE

Where direct placement is not possible, temporary storage will be permitted. Stockpiles will not exceed 3 m in height to limit self-weight consolidation and oxidation.

They will be placed in agreed low-risk areas away from drainage features and set out over geotextile membranes to provide separation from underlying soils.

Moisture levels will be actively managed to prevent desiccation, with damping down to be carried out during extended dry periods.

Should peat require storage for more than three months, the stockpile surface will be seeded with grass to provide erosion protection and stabilisation.

Storage Action	**Specification**	**Monitoring Requirement**
Maximum height	3 m	Weekly visual checks
Location	Away from drains/watercourses	Pre-approval by peat specialist
Cover	Grass seeding if >3 months	Inspection monthly
Moisture	Maintain damp condition	Regular checks, damping if dry

7. REUSE OF PEAT

The reuse of peat has been designed to maximise its environmental and ecological value.

In total, 3,000 m³ will be incorporated into residential garden soils.

This will involve blending peat with subsoils to produce an organic-rich medium capable of supporting low-input planting.

A further 561 m³ will be reused in landscaping and ecological features. This will include the creation of shallow scrapes seeded with sedges and rushes, wet grassland areas designed to benefit from the water retention capacity of peat, and organic-rich planting beds for native trees and shrubs (where possible).

The reuse strategy has been carefully designed to align with the Greater Manchester Wetlands Nature Recovery Network and to provide measurable biodiversity net gain.

REUSE AREA	PEAT VOLUME	APPLICATION	BIODIVERSITY BENEFIT
Residential gardens	3,000 m³	Incorporated at 0.45 m depth across 8,217 m²	Supports organic soils and low-input planting
Landscaping/habitats	561 m³	Wet grassland, scrapes, organic planting beds	Creation of wetland-associated habitats

8. MONITORING AND RECORD KEEPING

Monitoring will form a central part of the PMP. The peat specialist will maintain detailed records of volumes excavated, stockpiled and reused, with verification by the E3P Environmental Engineer. Compliance checks will be undertaken during excavation, storage and placement activities.

Monitoring will include inspection of garden soils, assessment of vegetation establishment in habitat areas, and identification of any issues such as settlement or erosion. Monitoring outcomes will be documented and reported to the Local Planning Authority and Natural England where requested on completion of the work.

9. AFTERCARE AND MAINTENANCE

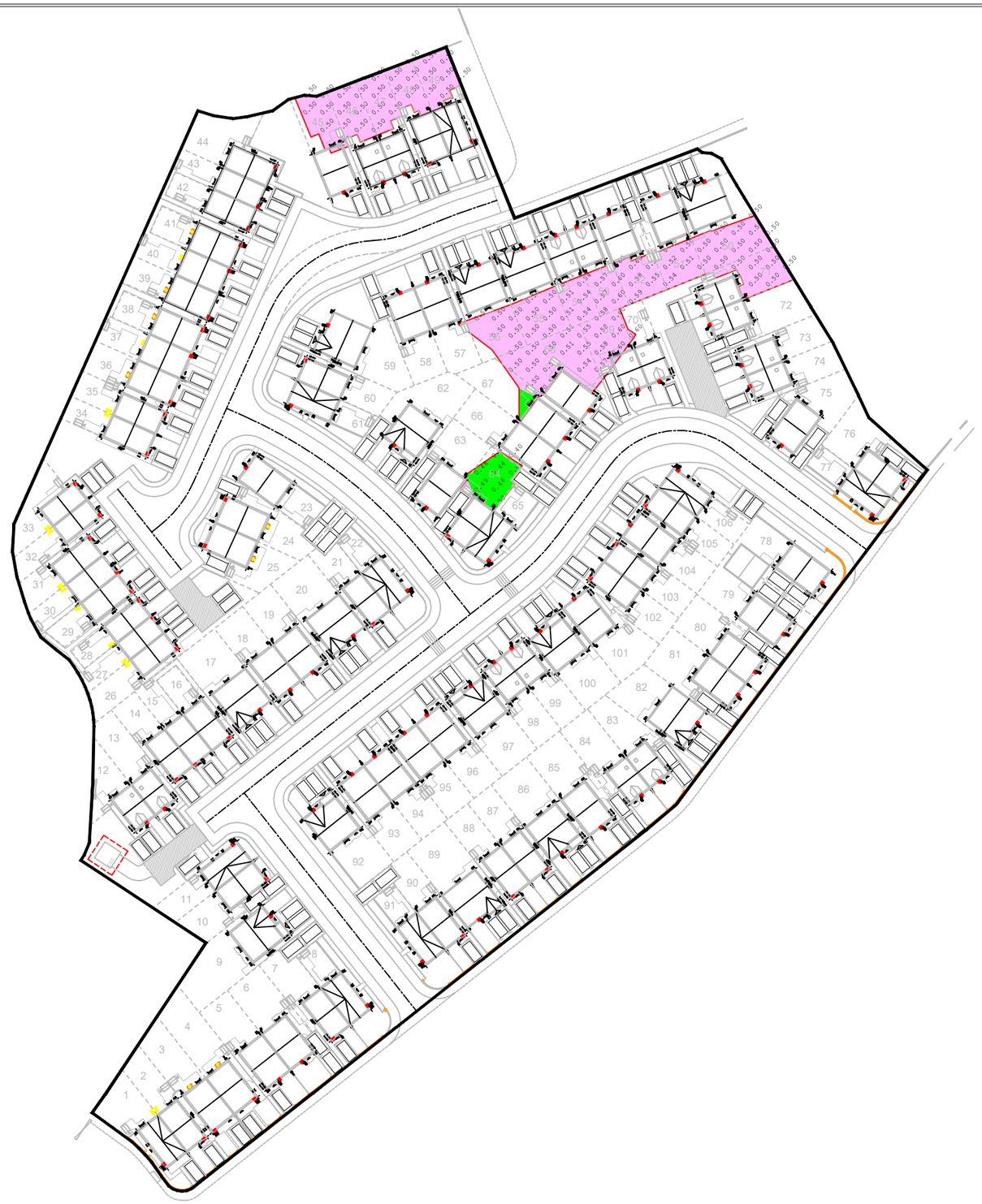
Landscape and habitat areas will be maintained by the appointed management company, with initial aftercare including watering, reseeding and vegetation management to ensure successful establishment. Where habitat creation features fail to establish, remedial measures will be implemented, including replanting or reseeding with appropriate native species.

10. CONCLUSION

The Peat Management Plan confirms that the peat resource at Hinchley Road will be either retained in-situ or reused across the development. Sensitive excavation, careful handling and controlled storage methods will be employed to minimise disturbance and environmental impacts.

Reuse of peat will be directed to both residential gardens and dedicated habitat creation, ensuring the material contributes positively to soil quality, biodiversity and ecological networks.

Through these measures, the plan provides a comprehensive response to Natural England's concerns, ensures compliance with planning policy, and demonstrates a responsible and sustainable approach to peat management.



Peat Thickness (m)

- Thickness of Peat 0.00 - 0.24m
- Thickness of Peat 0.25 - 0.49m
- Thickness of Peat 0.50 - 0.74m
- Thickness of Peat >0.75m

Notes:

Approximate Volume of Peat - 714m³
Approximate Area of Peat - 1389m²

Phase	Issue	Date	Drawn	Checked	PM
P1	REVB	14.10.2025	CB	MD	MD
P1	REVA	13.10.2025	CB	MD	MD

Client:

Miller Homes

Job No: 17-994

Date: 14.10.2025

Drawing No: 036

Scale: NTS @ A3

Job Title:

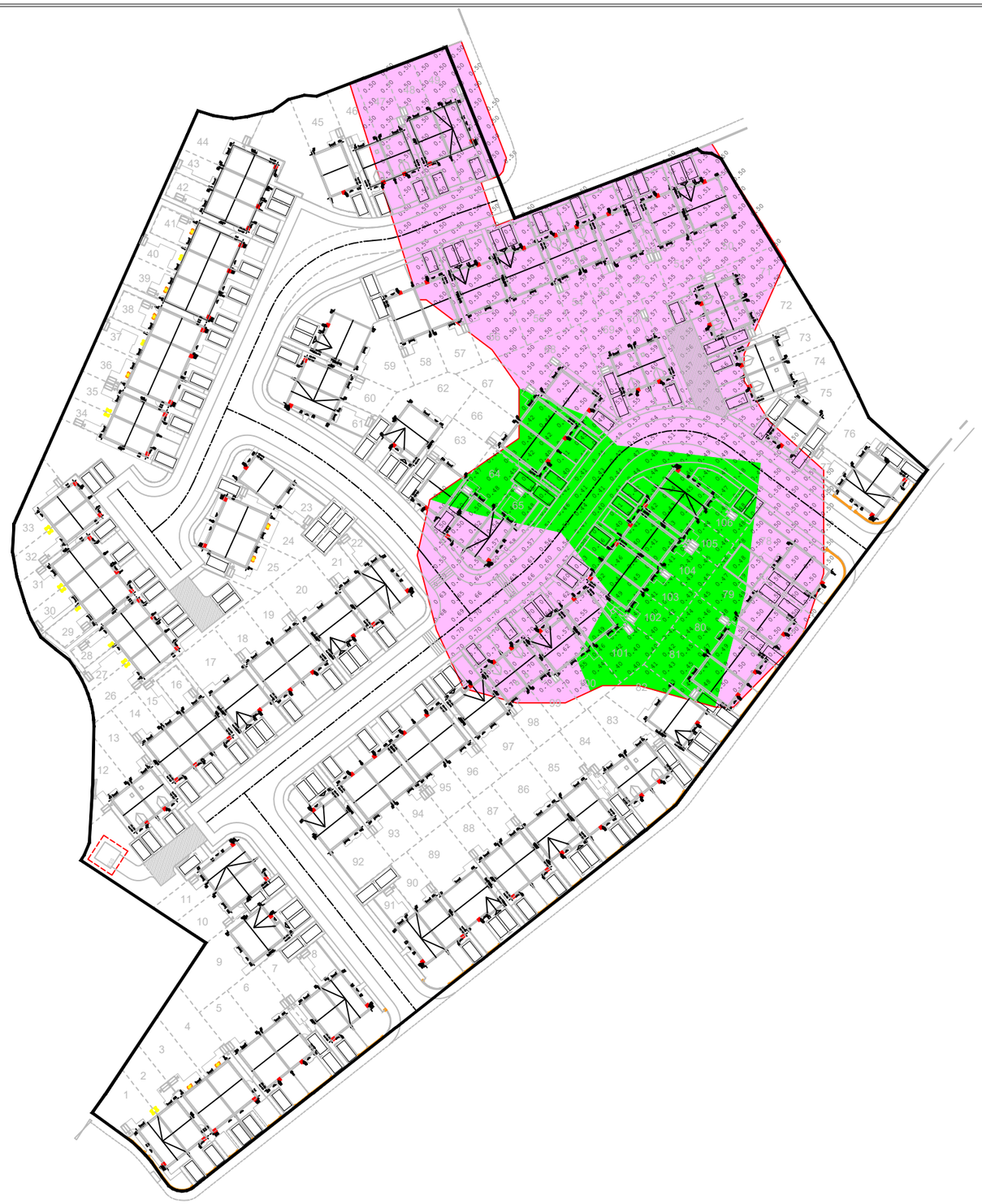
Hinchley Road

Drawing Title:

Thickess of Peat Plan (Gardens)

Environmental Engineering Partnership Ltd
Taylor Road, Trafford Park
Urmston, Manchester, M41 7JQ
Tel: 0161 707 9612
E-mail: info@e3p.co.uk
Website: www.e3p.co.uk

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Peat Thickness (m)

- Thickness of Peat 0.00 - 0.24m
- Thickness of Peat 0.25 - 0.49m
- Thickness of Peat 0.50 - 0.74m
- Thickness of Peat >0.75m

Notes:

Approximate Volume of Peat - 4275m³
Approximate Area of Peat - 8314m²

Phase	Issue	Date	Drawn	Checked	PM
P1	REVB	14.10.2025	CB	MD	MD
P1	REVA	13.10.2025	CB	MD	MD

Client: Miller Homes

Job No: 17-994

Date: 14.10.2025

Drawing No: 034

Scale: NTS @ A3

Job Title: Hinchley Road

Drawing Title: Thickess of Peat Plan

Environmental Engineering Partnership Ltd
Taylor Road, Trafford Park
Urmston, Manchester, M41 7JQ
Tel: 0161 707 9612
E-mail: info@e3p.co.uk
Website: www.e3p.co.uk

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