

Date: 20 June 2022



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**BY EMAIL ONLY**

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Dear Rebecca Coley,

**Natural England Peat Concerns**

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.

Following the publication of the England Peat Action Plan, Natural England wish to highlight our concerns in relation to development on peat and the implications in respect of both carbon emissions and the loss of wider environmental benefits.

*From England Peat Action Plan*

*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.*

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.

Following the publication of the England Peat Action Plan and the Greater Manchester (GM) Peat Pilot, Natural England has 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. 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. We have been working with partners to develop restoration methods which effectively restore even the most damaged and dry peat. We can restore the peat so it is able to hold water and sequester carbon if it remains in-situ and undeveloped.

Natural England do not support the principle of developing on peat and we advise you to consider its importance to the delivery of the Local Nature Recovery Strategy, ambitions

around Net Zero and the Climate Emergency declared by Trafford Council. We think peat should be a key consideration when reviewing planning applications and considering thematic policies/site allocations in your Local Plan. Please consider cascading this information to relevant colleagues in Development Management and Planning Policy departments.

For any queries relating to the specific advice in this letter please send your correspondence to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk) marked for my attention.

Yours sincerely

Janet Baguley  
Lead Adviser Sustainable Development