

GREATER MANCHESTER JOINT MINERALS PLAN
REPRESENTATION ON BEHALF OF WILLIAM SINCLAIR HORTICULTURE LIMITED (WSH)

1. This written representation is submitted on behalf of William Sinclair Horticulture Limited (WSH) and follows on from the MLA 2nd December 2011 letter sent to Mr Christopher Hobson, Programme Officer.

Status of WSH

2. We have seen a note (undated but forwarded to MLA on 3rd January 2012) to the Inspector in which the Minerals and Waste Planning Unit indicate they do not consider the previous representations made on behalf of WSH in relation to Policy 6 to be valid because they are out of time.
3. Our client's understanding is that the Inspector is charged with determining whether the Plan is sound. He is not charged with determining whether or not it is sound by reference only to validly made objections. Indeed, the Planning Inspectorate's Procedural Guidance "Examining Development Plan Documents" states at paragraph 2.4:

"The examination will be structured around the issues identified by the Inspector as critical to the soundness of the document. The summary of main issues provided by the LPA in the regulation 30(e) statement is particularly helpful to the Inspector. **However, whilst the subject matter of the representations will be taken into account, it will not dictate the structure of the examination, as the absence of representations on a matter is not a guarantee of soundness (and vice versa). Rather, the structure must derive from the Inspector's proactive and inquisitorial approach to considering soundness.** The Inspector will take charge of the examination and will not spend time at the hearings (subject to the right to be heard) considering things which will not help a decision as to whether the document is sound." (emphasis added)

4. This guidance makes plain that what is to be considered at an examination is not determined by what is contained in objections whether validly made or otherwise.
5. WSH considers that it is for the Inspector to consider for himself whether or not Policy 6 is sound. Consideration of soundness is required whether or not WSH has made an objection "within time". If the soundness of Policy 6 were not considered, our understanding is that this would lead to an error of law which might give grounds for challenge to the Plan at a later procedural stage.
6. We are therefore pleased to provide this submission of WSH's objection to Policy 6 in writing, as requested by the Inspector.

Policy 6

7. WSH does not consider Policy 6 of the draft DPD to be sound. Policy 6 as drafted in the submission draft of the DPD states:

"Peat

Planning permission for peat extraction will only be granted where:

1. The site has been previously worked for peat; and
2. The removal of peat is physically required to facilitate restoration and only peat physically required to implement that restoration is removed; and
3. The site is to be restored to lowland raised bog."

8. WSH objects to Policy 6 because it is open to the interpretation that no further planning permissions should be granted for peat extraction on sites which have already been or currently are subject to peat extraction. Indeed, at paragraph 5.64 the draft DPD states that the evidence indicates there are sufficient peat workings with planning permission to meet existing and future demand.

The Amendment Sought

9. WSH disputes strongly Policy 6 and the rationale for it. It contends that Policy 6 should be amended to read:

“Planning permission for peat extraction on sites that have not been previously worked will normally be refused

Planning permission for an extension of time on sites that have been previously worked will be granted provided that the site is restored to lowland raised bog upon cessation of the extraction.”

The Growing Media Market in the UK.

10. The Government has introduced a policy of voluntary reduction in the use of peat. On a voluntary basis peat is to be phased out of growing media as follows:
- a. by 2013 in soil conditioners;
 - b. by 2015 in relation to the direct procurement in contracts for plants in government and the public sector (new contracts);
 - c. by 2020 in the amateur gardener market for bagged growing media;
 - d. by 2030 for professional horticulture.
11. Policy 6 appears to be predicated upon the view that, in the context of the Government’s policy for a voluntary reduction in peat usage, there is already sufficient peat extraction within the UK to meet demand now and into the future. That is fundamentally incorrect.
12. Attached to this submission is Appendix A which explains the methodology that has been employed to examine the likely future demand for peat and peat free-media now and into the future. Below we examine:
- a. The current demand for peat and peat-free media;
 - b. The current supply of peat based media
 - c. The current supply of peat free media
 - d. The likely future demand for peat and peat-free media
 - e. The likely future supply of peat free media
 - f. The likely future demand for peat based media
 - g. The likely response of the market to reductions in UK peat supply

1) The Demand for Peat and Peat-Free Media

13. The market for peat and peat-free media within the UK consists of demand for growing media and for soil improvers. Within the total market for soil improvers and growing media there a number of different segments. The principal 3 segments are:
- a) The retail market (Government policy refers to this as the amateur market): Bagged or baled material sold through high street retailers such as B&Q, Tesco or garden centres to amateur gardeners for domestic use. The range of products manufactured includes topsoil, manure, multipurpose compost, soil improver, bark, John Innes. Multipurpose compost typically has a dilution of 25% in this market.

- b) The professional market: Bagged, baled or bulk growing media sold to large greenhouses and nurseries who in turn sell plants, including growing media to high street retailers, local councils and landscape professionals. Less peat substitution takes place in this market.
 - c) The amenity market: Baled or bulk growing media sold to local councils, sports clubs and civil engineering projects. Most growing media is already peat free in this market.
14. In Table 1 of Appendix A the volume of the total market between 1999 and 2009 as identified by DEFRA in Report no SP08020 "Monitoring the horticultural use of peat and progress towards the UK Biodiversity Action Plan target" (July 2010) is set out
 15. WSH does not accept the validity of the figures that are relied upon by the Government. It considers that the Government figures understate the use of peat in the market and over state the use of peat alternatives. WSH has written to the Government explaining that some of the product that the Government has treated as peat free is not free of peat material. The Minister has indicated that DEFRA has now commissioned a research programme costing £80,000 with the objective of developing a quantitative test for peat.
 16. WSH maintains the view that the Government has over stated that amount of peat free demand and understated the amount of peat demand. However, for the purposes of the analysis in this report the Government figures are utilised as they have been presented by DEFRA.
 17. In Table 1 of Appendix A the local authority market and the landscaping markets shown in Table 5.2 of the July 2010 Report have been aggregated into what is labelled the "Amenity" market.
 18. Table 1 shows (in Row J) that the total volume of growing media supplied into the market has grown from 5,330,000 m³ in 1999 to 6,975,000 m³ in 2009, a growth at a compound rate of around 2.5% a year for the 10 year period examined. The key driver for this is a growing and ageing population; gardening is significantly more popular with people over the age of 45. Office for National Statistic projections predict the UK population will grow from below 61 million in 2008 to 71 million by 2031 (approximately 1% per annum). Within this the population over the age of 65 in projected to increase by 60%. Thus, there will be a greater proportion of the population of the population with a greater propensity to engage in horticultural activity in the future. This will mean that the demand for growing media will continue to grow into the future.

2) Current Supply of Peat based media

19. The data in Table 1 of Appendix A show that total UK demand for peat was relatively static between 1999 and 2005 (3,432,000 m³ in 1999 to 3,436,000 m³ in 2005). Following 2005 however the market volume of peat has reduced to 2,963,000 m³ in 2009, a reduction of some 13.5% over that 4 year period.
20. Peat met 64% of the total growing media market in 1999 and 42% in 2009.
21. In DEFRA's report "Monitoring the horticultural use of peat and progress towards the UK Biodiversity Action Plan target" (July 2010 - attached) at Table 6 on page 13 data are set out showing the source of peat supplied to all horticultural markets. These data reveal that the percentage of the market demand met by UK sourced peat has varied over time reaching a peak of 45% in 2001 but declining to just 32% of the market in 2009.
22. In other words, **on the Government's own figures in 2009 some 68% of UK peat demand was sourced from peat outside of the UK. The current UK peat market is highly dependent upon peat imported from outside the UK to meet demand.**

23. As set out above, paragraph 5.64 the draft DPD states that the evidence indicates that there are sufficient peat workings with planning permission to meet existing and future demand. The DEFRA report data reveals that this statement is wholly and fundamentally incorrect. As this point forms a key basis of the justification for Policy 6, this demonstrates of itself that Policy 6 is not sound.
24. Figure 5 on page 12 of "Monitoring the horticultural use of peat and progress towards the UK Biodiversity Action Plan target" (July 2010) is also important. Figure 5 charts the volume of peat by sources comparing the UK sourced peat against imported peat. Figure 5 shows that the two sources mirror one another; when UK sourced peat declines, imported peat levels increase, when UK sourced peat increases, imported peat levels decrease.
25. The remarkable consistency with which this occurs in Figure 5 reveals the interconnected nature of the UK peat market and the peat markets within Ireland and Northern Europe generally. Indeed, the Government has recognised this in the Consultation Paper on reducing the horticultural use of peat in England (Document NP024) where the Government stated that "Domestic extraction and use (and policy initiatives to reduce consumption) are therefore closely inter linked with the wider European market for growing media and cannot be considered in isolation" (see page 11 paragraph 1.21)

3) Current Supply of Peat-Free media

26. Table 1 of Appendix A sets out the total UK market volume of peat alternative media between 1999-2009. Again this data is taken from Table 3 of DEFRA's report "Monitoring the horticultural use of peat and progress towards the UK Biodiversity Action Plan target" (July 2010).
27. As can be seen from Table 1 of Appendix A, the total UK demand for peat alternative media has increased from 1,896,200 m³ in 1999 to 4,011,900,000 m³ in 2009; that represents just over a two fold increase in the use of peat-free alternatives over the ten year period. On the basis of the DEFRA figures peat-free alternatives met 36% of the total UK market demand in 2009 and 68% in 2009.
28. In the DEFRA research project SP08019 (attached), the sources of the main materials with potential for use in growing media in the UK were identified. These were:
 - a. Bark
 - b. Wood by-products
 - c. Green compost
 - d. Manufactured woodfibre;
 - e. Coir fibre dust
29. Of these, bark is currently sourced from Europe as well as the UK. Coir fibre dust is a by product from the production of coir fibre for rope, matting etc from coconut husk. Currently coir is imported into the UK from Sri Lank and India.

4) The likely future demand for Peat and Peat-Free media

30. In Table 2 of Appendix A a view of the potential market demand is set out based upon the DEFRA figures utilising the methodology explained in Appendix A. An annual growth rate of 1.5 % in demand has been assumed which is considered to be conservative because:
 - a. Over the 10 years between 1999 and 2009 the annual compound growth rate has been 2.5%;
 - b. Since 2009 to date WSH experience is that growth has continued at least at past rates;

- c. Demand for peat and peat free media is driven by the numbers of those engaged in horticultural pursuits. Those pursuits are largely undertaken by those over 45. The proportion of those in the population over 45 is forecast to increase considerably into the future (see above)
31. WSH considers that the actual growth rate into the future is likely to be around the 2.5% historic rate or above. Thus, by adopting 1.5% growth for market demand it is likely that the total market will be materially understated in Table 2 of Appendix A. The adoption of a 1.5% growth rate is then a robust assumption.

5) The likely future supply of peat free media

32. As stated above, the Government has adopted a policy of voluntary peat use reduction to zero. Voluntary phase out targets have been set for each market:
- a. 2015 for the Government and public sector;
 - b. 2020 for the retail market; and
 - c. 2030 for the professional market
33. DEFRA has commissioned research into the likely availability of peat-free alternatives which was published in Report no SP08019 “The Availability and supply of alternatives for use in growing media to meet the UKBAP target on reduced peat in horticulture” (November 2009)
34. That Report identifies the potential additional availability of peat-free alternatives in 2015, 2020 and 2030 based on a number of assumptions. In the methodology in Appendix A an explanation is provided as to how the future potential availability of peat-free alternatives has been calculated in Table 2 of that Appendix.
35. IN fact WSH is of the view that the assumptions behind the additional availability of peat free media assumed in the DEFRA report and carried into Table 2 are unlikely to be realised in the real world, in relation to certain important materials, for the reasons that follow:
36. **Green Compost:** The DEFRA figures assume that some 42% of the total requirement in 2025 is made up from green compost sources (see SP08019 page 12 second paragraph). The Report explains that this level of green compost use is not practical because green compost cannot be used at a 42% inclusion rate in all sectors of horticulture. In effect separation of feedstocks needs to be significantly improved in order to produce compost of high enough quality to be used for growing media.
37. Further, this rate of inclusion assumes a doubling in green compost production every five years into the future which will only occur with significant investment in advanced processing by composters, so that they can produce compost of suitable consistency and quality for use in growing media. The DEFRA Report states that this is only likely to happen if there are fiscal incentives to use non-peat materials rather than peat in growing materials. WSH is not aware of any such fiscal incentives being proposed at present.
38. **Wood Fibre:** For the figures within the DEFRA report to be realised there would also have to be significant investment in production of wood fibre. The DEFRA figures assume that there will be five new woodfibre plants in operation by 2015, nine by 2020 and eleven by 2025. Each plant costs £1.4m. Thus the figures assume investment to the tune of £15.4m by 2025. The DEFRA report figures also assume that the woodchip feed stock to produce wood fibre would be available in sufficient volumes and at an economic price, in a market where there will be significant competition for that product from bio-energy production. WSH does not believe that the growing media industry is likely to respond in a market where there is likely to be significant competition for biomass

by investing such significant sums of money; rather, for reasons set out below, it is likely to respond by importing peat.

39. **Coir:** The DEFRA figures also assume investment in the infrastructure of coir producing countries to enable the volume of coir to increase ten fold by 2015, then to double by 2020 and then to increase by a third again by 2025. The Report notes that it is thought large volumes of coir are potentially available but that most coir factories are small operations with little mechanisation and are often remote from ports from which ships could transport the material to the UK. Again WSH does not believe that significant overseas investment in coir is likely to be made by the industry given that option of importing peat from overseas.
40. As is set out in Table 2 of Appendix A the result is that, even using the DEFRA report increases in the likely supply of peat alternatives, **there will be a significant shortfall in the availability of the supply of peat alternatives in the future compared to the total demand for media. That shortfall would have to be met by the use of peat.**
41. However, the DEFRA figures themselves cannot be relied upon because they make unrealistic assumptions regarding investment in infrastructure to produce peat alternative products. Thus, the extent to which peat will be needed to meet demand in the future will be significantly greater than is set out in Table 2.
42. Consequently, even if a conservative assumption is made regarding total market growth into the future and even if highly optimistic assumptions are made regarding the supply of peat free alternative materials, there will, in order to meet demand, continue to be a need for peat in the future well beyond 2025.

6) The likely future demand for peat based media

43. Table 2 of Appendix A identifies the amount of peat media necessary to meet demand. Although, as has been explained above, because of the assumptions adopted in relation to market growth and the availability of peat free media, this is likely to be a significant underestimate.
44. Table 6 of SP08020 identifies that the total source of peat supplied to all horticultural markets in 2009 was 942,000 m³. Some 200,000 m³ of this is the production from a site at Bolton Fell and this is included in this 2009 figure. Bolton Fell is due to cease production by 2014. Thus, in the figure for peat production in 2015, 2020 and 2025 200,000 m³ has been deducted from the 2009 figure of 942,000 m³ to give a UK production figure of approximately 740,000 m³. It should also be noted that the figures for 2009 include the production from the Chat Moss site which is the subject of an appeal against refusal of planning permission to permit extraction to continue to 2025. If that appeal is lost then, the figure of 740,000 m³ would need to be further reduced, thus increasing further the amount of peat that would have to be imported into the UK to meet the residual demand for growing media.
45. Table 2 shows that, on the basis of robust assumptions, even with the UK Government's policy of voluntary reduction in peat use in place, due to constraints in the supply of peat-free alternatives, **there will continue to be (as there is now) a requirement for more than the likely total supply of UK produced peat to meet demand. Peat will still have to be imported into the UK in 2025.**

7) The Likely consequences of reduction in the supply of Domestic peat

46. It has already been demonstrated that even on the basis of robust assumptions, the market will still require a greater amount of peat to be supplied to it than the UK will be able to produce. This

provides the context for considering how the market is likely to respond to any reduction in the UK sourced supply of peat between now and 2025.

47. The market will of course react in the way that is seen to be the most profitable by those participating within it. If a UK source of peat supply is lost, and is not replaced by another UK source, the market could theoretically react in one of three ways:
 - a. It might not meet that demand;
 - b. It might meet the demand through the use of peat alternatives; or
 - c. It might meet the demand through the importation of peat from outside the UK.
48. As to a), WSH does not believe that in a competitive market those engaged within that market would choose to pass up the opportunity for profit and not meet demand. It is highly likely that the market will do all it can to meet demand.
49. As to b), as explained above, a demand for peat arises even on the basis of the DEFRA figures relating to the supply of peat alternatives. Thus, logically speaking, a scenario where there is no available additional peat-free alternative supply is now being considered. Accordingly, this option would not be open to the market because it is already assumed that all peat free alternatives have been utilised.
50. That leaves only one option available to the market; to source the peat through imports from outside the UK. Indeed, given the large extent to which the UK already relies upon imports, it is plain that the market is already able and willing to import peat in response to demand exceeding domestic supply.
51. WSH will itself be importing peat from Ireland to make up for the shortfall in the peat as the result of the failure to obtain planning permission in 2011 at Chat Moss and the delays in the determination of the appeals.
52. Thus, the only realistic market response to reductions in the supply of domestic peat would be for it to be sourced via imports. This would have significant consequences:
 - a. **There would be no net gain in the reduction of CO₂ emissions.** The peat would be dug and used whether it was sourced from within the UK or not. Indeed, the CO₂ consequences of further reducing the supply of domestic peat from its present level is likely to result in significant increases in CO₂ emission as the peat will have to be transported greater distances from locations within Ireland and Northern Europe (such as Estonia);
 - b. Those supplying the UK market would have to purchase peat from abroad. Thus, **money which otherwise might be spent within the UK economy will be spent overseas and lost to the economy here;**
 - c. There is no guarantee that peat extracted from overseas would be extracted from sites that have already been worked; **overseas "virgin" sites could well be used, with the potential loss of lowland peat bog habitat if there is no guarantee that once extraction has ceased at a site overseas it would be restored to mire.**
53. By contrast, if domestic UK supply were maintained at its present levels to 2025, whilst it could not meet the residual demand for growing media in its entirety, so long as domestic peat remains competitively priced compared to imported peat, the likelihood is that peat imports would fall. There would be a number of advantages that would follow:
 - a. In terms of CO₂ emissions, this is obviously beneficial because it would mean that the domestic market would be met by an increasingly larger proportion of peat which has been

transported shorter distances. Government commissioned research (ref Defra project IF0154 page 23 Table 5) demonstrates that **domestically harvested peat has a lower carbon foot print than most available alternatives.**

- b. **The price paid by the market for domestically produced peat would remain entirely within the UK economy.**
 - c. **The use of virgin sites for peat extraction can be avoided through proper stewardship within the planning system. Planning conditions can be imposed to require restoration to bog.**
54. Even using the figures produced by the Government and its advisers, it can be seen that following a policy of allowing peat extraction from sites that have already been the subject of extraction in the past would have significant benefits. By contrast, a policy that leads to further contraction of supply by not allowing extraction from existing, but time-expired, peat extraction sites would give rise to significant harm in terms of climate change, the economy and for nature conservation.
55. There is presently no barrier to the importation of peat from with the EU. The UK Government cannot take unilateral action to ban such imports because to do so would be contrary to EU competition law. Further, the UK Government cannot impose any import duty for similar reasons. The result is that if domestic peat production reduces further, the increased shortfall in demand that will arise will be met by the market importing peat from overseas. A peat free growing media market could only be achieved through legislation on a European wide basis.
56. Although the Government has indicated that it is pursuing discussions internationally at a high level and within the EU, there are no proposals for EU wide legislation to reduce peat extraction. Indeed, the Government's Impact Assessment states at paragraph 48:
- “whilst there are no current plans for other European countries to phase out peat in horticulture there may be insulating factors which may buffer domestic producers from increased price competition from abroad...”
57. This is recognition that there is nothing to stop importation and that importation will become an increasingly competitive option in the future.
58. **Policy 6 as currently drafted would result in the continued loss of otherwise viable extraction from existing peat extraction sites in a context where the UK does not currently meet demand from domestically sourced peat. This further reduction will result in an increase in the use of imported peat in the future and an increase in CO₂ emissions. The result of Policy 6 as drafted currently is to increase climate change adverse effects and potentially resulting in extraction from “virgin” peat bogland overseas.**
59. Policy 6 as currently draft is thus founded upon an unsound evidence base. Further, it would not achieve the aim of reducing the region's impact upon climate change. It would result in increase in climate change impacts.
60. If Policy 6 goes forward as drafted and is interpreted as not allowing for the grant of planning permission for extensions of time on worked sites, so as to allow the extraction of peat for sale, the consequences will be precisely the opposite of the Government's objectives in terms of climate change.
61. Policy 6 as drafted is therefore unsound because its consequences would not be in line with Government Policy. Policy 6 must be amended so as to allow the grant of planning permission for the extension of time on worked sites.

Relevance of the NPPF

62. We note, however, that some representations made to the draft Minerals Plan have proposed that time extensions should be included within Policy 6. These appear to rely upon a reference to the draft National Planning Policy Framework paragraph 101.2 which states:-

“Authorities should not identify sites or extensions to existing sites for peat extraction”.

63. Our understanding on the draft NPPF paragraph, however, is that such extensions would only relate to physical, rather than temporal extensions. Any other interpretation would have the adverse consequences for climate change we have referred to above.
64. Further, the NPPF is not adopted policy and is subject to change. As such it should be given little weight.

Consequences for Restoration

65. Further, there are sites which may become time expired and where the existing planning permissions do not provide for restoration to bog; the WSH's Chat Moss site is but one example. Such sites will not be restored to bog unless new planning permission is obtained subject to conditions that require restoration to bog. However, operators are unlikely to apply for planning permission to restore to bog unless there is some commercial incentive in so doing.
66. As drafted, Policy 6 would not appear to enable an operator to sell peat extracted pursuant to any new planning permission (see Policy 6 criterion 2 which restricts extraction to that required to facilitate restoration).
67. There would thus be no commercial incentive upon an operator to apply for a further planning permission. They would not apply and thus the land would not be restored to bog. The habitat potential of sites to be returned to lowland bog habitats, as envisaged by Annex 1 of the Habitats Directive, would thus not be realised.
68. In this respect again Policy 6 would fail to attain the Government's objectives for enhancement of the natural environment. Again, this renders Policy 6 unsound.

Conclusions

69. For these reasons we commend the amendment proposed above, which we believe would result in a sound policy approach.

Enclosures:

1. WSH Appendix A
 - Table 1 UK Growing Media Market 1999-2009
 - Table 2 Future UK Demand for Growing Media
2. Defra Project: "Monitoring the horticultural use of peat and progress towards the UK Biodiversity Action Plan target" (SP08020) (July 2010)
3. Defra Consultation Paper on reducing the horticultural use of peat in England (December 2010 – NP024)
4. Defra research project final report (SP08019)

Appendix A

Methodology

1. There are two important reports produced for DEFRA that relate to the UK peat market:
 - a. Report no SP08019 "The Availability and supply of alternatives for use in growing media to meet the UKBAP target on reduced peat in horticulture" (November 2009)
 - b. Report no SP08020 "Monitoring the horticultural use of peat and progress towards the UK Biodiversity Action Plan target" (July 2010)
2. SP08019 contains an appraisal of the potential availability of materials in the future for non-peat alternative media.
3. SP08020 contains an appraisal of the nature of the market for peat in the UK
4. Table 1 below sets out the figures from SP08020 which breaks down the total market for peat in the UK. This includes peat used for soil improvers and for growing media.
5. The base used for the growth of the availability of non-peat alternatives in SP08019 is 2007. The report identifies in Table 3 a total growing media market in 2007 of 3,940,000 m³ of which 2,963,000 m³ was met by the use of peat. Thus in 2007 the report identifies that the volume of peat alternatives used in the growing media market was some 977,000 m³
6. SP08019 identifies in its Table 4 the potential availability of non-peat alternatives in 2015, 2020 and 2025 based on a number of assumptions which are set out in that document.
7. By 2015 the report assumes that an additional 1,133,000 m³ of peat alternatives will be available over that available in 2007 (i.e. 2,110,000 m³ from Table 4 less the 977,000 referred to in paragraph 5 above). Between 2015 and 2020 the report assumes that an additional 1,310,000 m³ will be available over that available in 2015 (i.e. 3,420,000 m³ less 2,110,000 from Table 4). Between 2020 and 2025 the report assumes that an additional 1,710,000 m³ (i.e. 5,130,000 m³ less 3,420,000 m³).
8. In Table 2 below the potential growth of the UK peat market as a whole is examined.
 - a. Row P: The total market in 2007 as identified in SP08020 has been used as a base. The total market has been grown by 1.5% per annum to provide the total market demand in 2015, 2020 and 2025. The realism of an assumed annual growth rate of 1.5% is covered within the submission.
 - b. Row Q: The amount of peat alternatives available for 2015, 2020 and 2025 has been calculated by utilising a base for 2007 of 3,596,000 m³ which is taken from Table 3 of SP08020. To this the total additional available peat alternatives derived from SP08019 (as set out in paragraph 7 above) have been added.
 - c. Row R: Sets out the total amount of peat required to meet the shortfall between total market demand and the amount of available peat alternatives. This is the difference between Row P and Row Q.
 - d. Row S: The total amount of UK peat supplied to all horticultural markets in 2007 was 1,308,000 m³ (see SP08020 Table 6) and that figure is included in Table 2 below. Table 6 of SP08020 identifies that the total source of peat supplied to all horticultural markets in 2009

was 942,000 m³. Some 200,000 m³ of this is the production from the site at Bolton Fell and this is included in this 2009 figure. Bolton Fell is due to cease production in 2014. Thus, in the figure for peat production in 2015, 2020 and 2025, 200,000 m³ has been deducted from the 2009 figure of 942,000 m³ to give a UK production figure of approximately 740,000 m³. It should also be noted that the figures for 2009 include the production from the Chat Moss site.

- e. Row T: This represents the amount of peat that would need to be imported into the UK to meet demand and is the difference between Row R and Row S.