

Greater Manchester Joint Minerals Plan

Lancashire Wildlife Trust response to William Sinclair's proposed amendments

Lancashire Wildlife Trust was consulted in the first round of consultation on the Greater Manchester Joint Minerals Plan and subsequently submitted comments.

The Trust was not consulted in the second round of consultation. However, we were satisfied that the draft Minerals Plan was sound, and we were content with the outcome of the consultation process.

We have seen the late submission made on behalf of William Sinclair Ltd relating to Policy 6 on peat extraction which was one of our key areas of interest in the Minerals Plan. We would now like to submit the following comments on the proposed amendments.

One of the necessary attributes of a policy such as the Joint Minerals Plan is that it should be seen to be consistent so far as possible with local authority policies contained in the Unitary Development Plans and Core Strategies. It also needs to reflect emerging government policies, and this is not an easy balance to strike in some cases.

However, in the Trust's view, Policy 6 of the draft Joint Minerals Plan had struck exactly that balance. It represented a consistent unifying policy which complemented the Core Strategies on peat extraction. It was also consistent with the clear direction of emerging government policy represented by the targets set in the Natural Environment White Paper and the statements relating to peat in the draft National Planning Policy Framework (NPPF).

We object to and reject William Sinclair's statement in para 63 that the consultation draft NPPF paragraph "*Authorities should not identify sites or extensions to existing sites for peat extraction*" refers only to spatial and not to temporal extensions. The Wildlife Trusts made representations on the draft NPPF seeking to strengthen the wording to clarify that neither spatial nor temporal extensions should be permitted.

The proposed amendment by William Sinclair would completely destroy the balance in the draft Minerals Plan. It would lead to inconsistency, confusion and uncertainty. This is exactly the reverse of what the Joint Minerals Plan should be seeking to achieve. In the Trust's view, inclusion of the proposed amendment would mean that Policy 6 was no longer sound and this would open the door to continued peat extraction.

William Sinclair argues that there is an insufficient supply of non peat-based compostable material, and that there are concerns over the quality of the material, and a need for investment in further processing in order to make better use of materials such as green compost.

They also argue that cessation of peat extraction on UK sites would simply lead to extraction from sites outside the UK, possibly from "virgin" sites.

The Trust completely rejects these arguments. We are of the view that the Government targets for a cessation of peat use in the voluntary sector by 2020, and in the professional sector by 2030, give

adequate time for a ramping up of the supplies of non peat-based media and for the necessary investment in improved processing, leading to a more consistent, higher quality product which is clearly a desirable outcome.

William Sinclair has led the field in the development of peat free composts and is manifestly capable of carrying out and implementing the necessary research and development.

In paragraph 65 William Sinclair states that sites such as Chat Moss: *“...will not be restored to bog unless new planning permission is obtained subject to conditions that require restoration to bog.”*

The Trust completely rejects this statement. The existing permissions at Chat Moss include a condition requiring restoration to amenity use which is an umbrella term including possible restoration for nature conservation such as lowland raised bog. The accompanying Section 106 agreements include clauses requiring the agreement of restoration plans with the local authorities. They also say:

“The emphasis will be on the provision of relatively wet areas where “wetland” vegetation and fauna can become established.”

This provides the clearest possible indication that restoration to lowland raised bog was the intention, and discussions with the local authorities concerned should have proceeded along those lines.

In summary, the Trust believes that the existing Policy 6 is sound and should be retained. The proposed amendments would make it unsound and must be rejected.