

Response to Inspectors Additional questions in relation to the MWPU response to the representation from William Sinclair Horticulture Ltd

- 1. The GMGU states that Policy 6 has been developed in line with requirements of national Minerals Planning Policy and evidence used to inform NW RSS. Please could the GMGU explain in greater detail which national requirements are these? In addition, could the RSS evidence which contributed to Policy 6 be clarified.**

We have responded to the last part of this question which relates to RSS within the answer to Question 2. Policy 6 has been developed in line with the following national Minerals Planning Policies, Strategies and Plans:

Minerals Planning Guidance 13: Guidelines for Peat Provision in England

MPG13 states within the introductory chapter, paragraph 5 that: *"It is also Government policy that peat bogs which retain a high level of nature conservation interest and which represent a part of the country's "critical natural capital", or are important for the archaeological heritage, should be protected and conserved for the benefit of future generations. In accordance with these policies, continued and future peat extraction should be limited to areas which have already been significantly damaged by recent human activity."*

MPG13 also notes that the Government wish to encourage the development of alternatives to peat for both the less demanding uses and of more specialised alternatives for more demanding uses. The document also refers to the target of 40% of market requirements to be supplied by non-peat materials within 10 years i.e. by 2005 (para. 40).

UK Biodiversity Action Plan Review (UK BAP) (2007)

The UK Biodiversity Action Plan (UK BAP) identifies lowland raised bog as an Annex 1 habitat. It is therefore recognised as being of European importance and included for protection under the Habitats Directive. The UK BAP extended the target of the total market for growing media and soil improvers to be based on non-peat materials set within MPG13 of 40% by 1995 to 90% by the end of 2010.

Reducing and phasing out the horticultural use of peat in England: Impact Assessment' by DEFRA (June 2011):

This report provides the reasoning behind the Government's clear intention to phase out entirely the horticultural use of peat in the UK and states with the summary:

"Peat is an important and effectively non-renewable natural asset and the continued extraction of peat for horticulture at the current rate is unsustainable, also contributing to climate change and destruction of important habitats, biodiversity and archaeology. These external impacts and costs of extraction are not reflected in the market price of peat, and Government intervention is necessary to facilitate a shift to peat-free alternatives. Important progress has already been made in reducing peat use in response to previous voluntary targets, but the market is still only 57.5% peat free, and England's consumers and businesses continue to use around 2.4 million cubic metres of peat for horticulture every year".

Consultation on Reducing the Horticultural Use of Peat in England (Defra, December 2010)

The above consultation document invited views on proposals to reduce and phase out the horticultural use of peat in England. Following the consultation, Defra set out its plans for reducing the horticultural use of peat in the Natural Environment White Paper (details below).

The Natural Choice: securing the value of nature (White Paper CM8082, June 2011)

Paragraph 2.66 of the above White Paper states *"We want to reduce peat use to zero by 2030, setting the following milestones:*

- *a progressive phase-out target of 2015 for government and the public sector on direct procurement of peat in new contracts for plants;*
- *a voluntary phase-out target of 2020 for amateur gardeners; and*
- *a final voluntary phase-out target of 2030 for professional growers of fruit, vegetables and plants;*
- *we will establish a Task Force bringing together representatives from across the supply chain with a clear remit to advise on how best to overcome the barriers to reducing peat use, exploring all the available measures to achieve this goal;*

- *building on the advice of the Task Force, we will review progress towards these targets before the end of this spending period and consider the potential for alternative policy measures if necessary.”*

Draft National Planning Policy Framework (NPPF) (July 2011)

Paragraph 101 of the NPPF states: *“In preparing minerals plans local planning authorities should: not identify sites or extensions to existing sites for peat extraction.”*

Conclusion

The evidence above shows that Policy 6 of the Minerals Plan reflects the Government’s clear intention to phase out entirely the horticultural use of peat in the UK. Policy 6 is in accordance with MPG13 and emerging National Planning Policy Framework. Policy 6 would also play an integral role in the Government meeting the milestones set out within the recently produced White Paper.

2. GMGU states that para 5.64 of the Plan is an accurate statement regarding the position on peat as set out within the North West according to the RSS. Please could this be clarified?

A clarification of the RSS evidence which contributed to Policy 6 is as follows:

Policy EM7 (Minerals Extraction) of the North West Regional Strategy (September 2008) states that *“Plans and strategies should make provision for a steady and adequate supply of a range of minerals to meet the region’s apportionments of land-won aggregates and requirements of national planning guidance”*. This should take into account factors which include the national significance of the Region’s reserves of identified minerals (including peat), but should also take into account the contribution that substitute, secondary or recycled sources, or imports should make.

The 2007 Panel Report for the North West RSS states in paragraph 8.58: *“The Growing Media Association explained that it would be difficult to meet the 90% target set in the Biodiversity Action Plan. An embargo on peat extraction would put UK producers at a disadvantage against foreign competitors. Extant planning permissions for peat working in the North West would not expire until 2042. These would be sufficient to meet the expected needs of the industry up to that time.”*

In addition to this, the Sustainability Appraisal (SA) of the Sub-Regional Apportionment Update (July 2010) lists Objective 1c) (b) as *“ensuring minerals extraction takes account of... retaining unexploited peat reserves as important carbon sinks and biological resources.”*

Conclusion

It is on the evidence set-out above from the RSS Panel Report and supported by an objective of the SA for the Sub-Regional Apportionment Update that Policy 6 was formulated.