

**SUBMISSION ON BEHALF OF WILLIAM SINCLAIR HORTICULTURE LIMITED RELATED TO MWPU RESPONSE TO INSPECTOR'S ADDITIONAL QUESTIONS**

**1. INTRODUCTION**

- (i) In responding to the MWPU further submission, in light of the WSHL representation of 3<sup>rd</sup> February 2012, the detailed evidence contained within the WSHL representation is not repeated, other than by way of cross-referencing between paragraphs 1 – 69 (being the original paragraph submissions) or to the Appendix A documents

**Information Concerning Peat Supply and Demand**

- (ii) We believe that the WSH Appendix A provides the GMJMP Examination with up-to-date and accurate information about the UK growing media market 1999 – 2009 (Table 1) and a detailed assessment of the future UK demand for growing media (peat and peat alternatives between 2007 – 2025). Table 2 shows that there will remain a requirement for British peat production until at least 2025. Related to this, the draft DPD assumption that there are sufficient peat workings (with planning permission) to meet existing and future demand is fundamentally incorrect.
- (iii) The MWPU response appears to rely on the Growing Media Association (GMA) submission and as quoted in the 2007 Panel Report of the North West RSS, i.e.:

**“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.”**

- (iv) In response to this we consider:
- a) The assessment made at the time of the GMA submission and 2007 Panel Report is now out-of-date and should not be relied upon for the Joint Minerals Plan. (Please note WSHL is not a member of the GMA and so was not in a position to comment on, or correct, its submission.)

- b) “Extant planning permissions” at the time of the 2007 Panel Report would, of course, have included the Chat Moss site and which seems, therefore, to suggest an error of fact and understanding – because the Chat Moss planning permissions did not run through until 2042 – but expired at the end of 2010. Given the relevance, therefore, of the Chat Moss site both regionally and nationally for peat production in England, the figures and conclusions from the 2007 Panel Report for the north west RSS should not be relied upon as accurate or up-to-date (see WSH submission paras 19 – 25.)

## **2. MWPU CONCLUSION RELATED TO QUESTION 1**

- (i) MWPU are wrong to conclude that Policy 6, as drafted, reflects the Government’s current policy for the extraction of peat – notwithstanding the overall policy of voluntary peat use reduction based on phase out targets, as set for different market sectors, between 2015 and 2030.
- (ii) Even that phasing out programme, however, requires the continued and assured supply of peat to meet the identified demand, whilst also allowing for available peat free alternatives to be used (see WSH submission paras 32 – 42.) The expected and significant shortfall in the supply of peat alternatives will require such shortfall still to be met by the use of peat.

## **3. MWPU CONCLUSION RELATED TO QUESTION 2**

- (i) Para 5.64 of the DPD claims that the evidence base “**indicates that there are sufficient peat workings with planning permission to meet existing and future demand and no planning permission need be granted for new peat workings.**”
- (ii) Although the MWPU have been given the opportunity to substantiate further the evidence base on which the RSS had to rely, it is noted that no challenge has been made to the WSHL Table 1 and Table 2 figures, based on two Defra project reports and with WSHL projections derived principally from the July 2010 Report No. SP08020 “**Monitoring the Horticultural Use of Peat and Progress towards the UK Biodiversity Action Plan Target.**”

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- (iii) In other words, by simply repeating summary paragraphs from the 2007 Panel Report from the North West RSS, the MWPU have not in any way substantiated para 5.64 of the Plan, nor has clarification been given in relation to the anticipated future demand for peat and peat free growing media.

#### 4. WSHL COCLUSION

- (i) Reliance on earlier figures, or incorrect assumptions, is likely to render Policy 6 unsound.
- (ii) Only by amending policy wording, as as set out in the WSHL 3<sup>rd</sup> February 2012 Representation (para 9) will the Minerals Plan be sound with respect to Policy 6.

**Martin J Leay**  
22<sup>nd</sup> February 2012