



**Minerals and Waste Development Framework**

## **Statement of Representations**

### **Somerset Peat Paper – Issues consultation for the Minerals Core Strategy**

Statement of compliance with Regulation 30 of the Town  
and Country Planning (Local Development) (England)  
Regulations 2004

**April 2010**

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## **1. Role of the Statement of Representations**

When a development plan document (DPD) is submitted to the Secretary of State for independent examination, the DPD must be accompanied by documents such as the 'Statement of Representations' that demonstrate how the authority has complied with relevant requirements contained in the Town and Country Planning (Local Development) (England) Regulations 2004.

The purpose of the Statement of Representations is to set out:

- Which bodies and persons were invited to make representations on the document.
- How those bodies and persons were invited to make representations.
- A summary of the main issues made in the representations received.
- How the representations have been taken into account.

This submission stage of the Somerset Peat Paper – issues consultation for the Minerals Core Strategy is known as a Regulation 30 document, because it is carried out in accordance with Regulation 30 of the Town and Country Planning (Local Development) (England) Regulations 2004.

## **2. Somerset Peat Paper – issues consultation for the Minerals Core Strategy: a brief overview**

From 19 October to 11 December 2009, Somerset County Council undertook consultation on the current peat strategy in the adopted Minerals Local Plan (MLP) and focused on key issues that needed to be considered whilst creating planning policy for peat extraction in the future. The consultation was distributed to 129 specific internal and external consultees (see Appendix A) and made publicly available via the Somerset County Council website.

The intention of the Somerset Peat Paper was to gather information that would support decisions relating to the development of minerals planning policy for future peat extraction in Somerset. This exercise was the beginning of the consultation process for the development of the Somerset Minerals Core Strategy (MCS), which will replace the MLP.

The following subject headings were used in the consultation paper:

- Current policy, Minerals Local Plan, 1997 – 2011
- Minerals Core Strategy
- What is peat?
- Peat extraction
- Peat usage
- Economics and employment
- Transport
- Restoration
- Habitat and Archaeological Designations

- Habitat
- Archaeology
- Water/flooding
- Climate change and carbon storage
- Agriculture

Within this structure, a series of specific questions were posed, seeking to gather the consultees opinions on the above topics. The questions are detailed in the next section. Consultees were also encouraged to provide additional comments and questions.

### 3. The questions posed

<b>Peat usage</b>
1. To date the growing media market has been encouraged to use peat-reduced and peat-free products by providing information on the impact of peat extraction in the UK and abroad. However, peat products being competitively priced and perceived to be a more reliable product have continued to sell well. The peat and growing media industries have produced a range of growing media products with reduced-peat but typically these are around 30% nonpeat content, too high to meet the 2010 target of 90% of the growing products market being non-peat.
How appropriate is it for the Minerals Planning Authority to reduce the supply of peat products by limiting further land available for future peat extraction?
<b>Economics and employment</b>
2. How significant is the growing media industry to the rural economies in Sedgemoor and Mendip?
3. Is the extraction of Somerset peat essential for the growing media industry in Somerset?
4. What are the key factors that influence the economic viability of the growing media industry?
<b>Transport</b>
5. Should restrictions on peat extraction be eased, or other measures to accommodate the growing media industry be implemented to reduce the risk of other businesses moving into the area in their place?
6. Historically there were rail and canal links to the area. If one of these alternative transport options were considered who else could benefit from them and where should they be linked from and to?
7. What other measures could be taken to limit the impact of the growing media industry road traffic in the area?
<b>Restoration</b>
8. What restoration options should be encouraged and what constraints should be applied?
9. With the right constraints could peat extraction positively contribute to the local environment? For example could shallow peat extraction be harnessed to finance more peat-forming habitat as demonstrated in Germany? Or recreate a large shallow lake with habitat and tourism opportunities?
<b>Habitat and archaeological designations</b>
10. Some operators argue that the artificially high cost of land within the peat production zones (PPZs) would fall (see Economics section of the paper, pg 8) and the pressure to maximise extraction would be reduced, enabling operators to manage their sites in a more environmentally sensitive way, for example by leaving more peat in the excavation margins and base and forming more naturally shaped water bodies.

Given the level of designations in the peat area should the additional constraint of PPZs be removed (Figure 5 in the paper)?
<b>Climate change and carbon storage</b>
11. How important is it to preserve the carbon store within Somerset's peat deposits?
<b>Agriculture</b>
12. As climate change and population pressures increase agricultural land may become more of a premium. Should we remove the opportunity for future generations to access agricultural land by excavating our peat soils and leaving water filled lakes?

#### 4. Representations

We received a total of 21 representations from a broad range of consultees, including local residents, parish councils, the private sector, the growing media industry and internal partners. All representations have provided valuable and compelling comments, one respondent in particular (R14), provided an extensive and detailed response linking many aspects of the Somerset Peat Paper to government policy and the MLP.

Apart from demonstrating that the County Council has complied with the requirements of the Town and Country Planning (Local Development) (England) Regulations 2004 the intention of this Regulation 30 statement is to summarise the representations received in order to assist the development of mineral planning policy for future peat extraction in Somerset.

While this Regulation 30 statement does not include all of the comments and information from every representation received, some comments are included in the following pages. Detailed comments from specified consultees are presented in text boxes.

#### 5. Peat usage

##### Question 1

To date the growing media market has been encouraged to use peat-reduced and peat-free products by providing information on the impact of peat extraction in the UK and abroad. However, peat products being competitively priced and perceived to be a more reliable product have continued to sell well. The peat and growing media industries have produced a range of growing media products with reduced-peat but typically these are around 30% nonpeat content, too high to meet the 2010 target of 90% of the growing products market being non-peat.

How appropriate is it for the Minerals Planning Authority to reduce the supply of peat products by limiting further land available for future peat extraction?

Twelve representations said this was appropriate, with reasons including:

- [R2] 'Possible stabilisation of the price of agricultural land if peat production on it is not an option. Agricultural operations are, however, limited as this is an environ-sensitive area.'
- [R6.1] 'To help phase out peat production and ultimately aid the achievement of the UK target of 90% of growing media being peat free by 2015.'
- [R10] 'Reduce the release of greenhouse CO2 into the atmosphere and conserve the man made landscape and therefore the designation as a Special Protection Area and RAMSAR site.'
- [R15.1] 'The review of minerals in Somerset provides an opportunity for the county to lead in reducing damage to irreplaceable peat deposits, and ultimately ending exploitation of a resource that provides essential ecosystem services to society which far outweigh the short-term needs of the horticultural industry.'
- [R17.1] 'Help protect ecology, archaeology and residential/commercial property from damage.'
- [R18.1] 'The actions contained within Defra's 'Safeguarding our Soils' strategy.'

**[R6.1]** The MPA gives no figures to show what percentage of the national resource occurs in Somerset, how large its contribution of peat to the market is, what the biological quality is of resources available outside designated areas, and how these compare with other Authorities in the UK. These figures are necessary for creating an evidence-based policy. It is clear that the previous policies adopted by Authorities in the UK have not been sufficiently robust/effective in ensuring that the 90% target has been met and that, therefore, sustainability objectives are not being met. This indicates to us that there has to be a substantial shift in approach by MPAs. More robust measures will be necessary in order to help to reverse the effects of failure to achieve the 2010 target.

**[R16.1]** 'Somerset County Council is currently seeking World Heritage Site status for the Somerset Levels and Moors, and has the support of English Heritage in this regard. If such status is granted within the life of the MCS how will minerals policy be compliant with MPS1 (p.7) whose guidance is 'do not permit major mineral developments in *National Parks, the Broads, Areas of Outstanding Natural Beauty* and *World Heritage Sites* except in exceptional Circumstances'.

Five representations object to Question 1. The main reason's being:

- [R7] 'Create cost implications for amateur gardeners and increase the price of any available land.'
- [R14] 'Limiting further land available for future peat extraction may lead to increased imports of peat and therefore a greater number of HGV movements. The increase in imports would have an adverse impact on

both biodiversity and carbon emissions on the areas of replacement peat, most likely to be from outside the UK.'

- [R14] 'Operators may seek to ensure that permitted reserves last as long as possible.'

[R14] It is also unreasonable to look at Somerset in isolation from the rest of the UK in considering such a radical step. For SCC to reduce the supply of Somerset peat as a method of reducing the supply of peat products would inevitably have a negative impact on the industry locally and the economy of the county without helping to achieve the 90% aspiration for the UK as a whole. To attempt to do so would also have serious unintended negative consequences.

## 6. Economics and employment

### Question 2

How significant is the growing media industry to the rural economies in Sedgemoor and Mendip?

Five representations stated the growing media industry is significant to the rural economies in Sedgemoor and Mendip, the following statements supporting these views:

- [R7] 'It is essential to support small businesses in Sedgemoor and Mendip.'
- [R10] 'It is questionable that it significantly contributes to the rural economies at a district level.....the contribution may be more significant at the village and hamlet level close to the processing sites.'
- [R11] 'Significant in the short term, decreasing in significance over the next fifteen years.'

[R14] The modern economic impact is both direct, in terms of employment and expenditure but also indirect. There is significant employment and expenditure associated with the industries that service growing media production. Whilst some suppliers, such as bag and film manufacturers are located outside of the county, many others suppliers are local. For example, a significant proportion of the transport, engineering, electrical, chemical and accountancy providers are located within Mendip and Sedgemoor.

Similarly five representations clearly stated there was little/no significance felt in the rural economies from the growing media industry:

- [R4] 'It employs few people and reduces the income from tourism and Nature Reserves which are much more important to the community.'
- [R6.1] 'It would appear that the growing media industry is in decline and that its significance is reducing.'
- [R17.1] 'If the figure of only 42 people employed in peat extraction in Somerset is correct then the contribution to the rural economies in Sedgemoor and Mendip is not going to be significant given the other rural industries (quarrying, agriculture, tourism).'

**[R18.1]** Whilst 42 jobs undoubtedly makes a contribution to the rural economies in Sedgemoor and Mendip, this question should be re-phrased to consider potential/existing alternative economic benefits of peat, which (continued) extraction diminishes. Evidence is accumulating that intact peatland habitats can generate other economic benefits.

### Question 3

Is the extraction of Somerset peat essential for the growing media industry in Somerset?

Question 3 received a mixed bag of positive, negative and balanced comments.

Four respondents said yes and five said no, with supporting reasons including:

- [R7] 'It is essential for the growing media in Somerset to use Somerset peat in their products. Somerset peat is well known and well respected.'
- [R14] 'Deliberately restricting future supplies of Somerset peat in isolation would slowly reduce the scale of the industry locally and the contribution that it makes to the local economy.'
- [R16.1] 'There is surely potential for the development of local alternatives based upon the green recycling of waste at nearby Walpole and the possibility of using reed compost as a growing media product.'

**[R15.1]** Peat soils are of greatest value to society when remaining *in situ* and managed to maintain the ecosystem services they provide, including carbon storage, water storage and purification, supporting biodiversity and preserving irreplaceable archaeological material and pollen and plant remains which represent an invaluable record of environmental change.

One respondent [R17.1] provided a conservative response to question 3, set out below.

**[R17.1]** If no Somerset peat were extracted then most of the products will need to be imported, potentially from abroad, questioning the viability and sustainability of the industry. Some of the larger companies may survive but not the smaller ones.

Factors to consider - factories already established, transport routes poor, what is the potential for green waste composting (supply of green waste to mix in with imported material).

Local market for growing media should be good as this is a rural county.

#### Question 4

What are the key factors that influence the economic viability of the growing media industry?

The representations received display similar key factors, the most common of which are outlined below:

Representation	Key Factors
[R2] [R10] [R19] [R17.1]	Land price
[R2] [R10] [R16.1] [R17.1]	Production costs (extraction and processing) and demand for product
[R4] [R10] [R11] [R14] [R17.1]	Transport; access to road and transport links; closeness to the source and distribution points
[R2] [R11]	Quality
[R11] [R17.1]	Availability
[R11]	Selling price
[R4]	Profit
[R4]	Cost of materials-which will increasingly be determined by the peat alternatives.
[R17.1]	Effectiveness and cost of alternatives
[R10]	Restoration costs
[R14]	Availability of a suitably skilled workforce

**[R6]** The key factors to be considered should pertain to the growing media industry of the future within a largely peat-free growing media market. Our view is that it is essential to reduce extraction in order to meet targets that are already overdue and reverse the resulting declines.

**[R18.1]** The main one has to be the market for peat-based products, which is affected by the cost/reliability of alternatives, and this market is likely to significantly decline over the coming years (see Question 1). Costs for peat alternatives are likely to fall as the products gain wider acceptance and investment and economies of scale bring cost benefits.

#### 7. Transport

##### Question 5

Should restrictions on peat extraction be eased, or other measures to accommodate the growing media industry be implemented to reduce the risk of other businesses moving into the area in their place?

The majority of representations which answered Question 5 gave generic comments, providing no specific answer and mentioned many issues related to the question. However, five respondents said no, with supporting comments such as:

- [R4] 'The producers should be encouraged to move nearer to the sources of replacement materials.'
- [R5] 'Other industry or expansion of growing media processing will bring extra traffic. But I can see no alternative since some sites have B2 use.'

**[R19]** Restrictions on peat extraction should not be eased. Peat extraction affects the whole of the landscape. Once peat extractions start it automatically lowers the water table. Residential properties, farm buildings and roads within the area depend on an even water table.

Some peat producers have already diversified and other businesses have already moved within the parish of Sharpham because of this, but they are not extracting valuable minerals and causing suffering to humans and wildlife alike.

Alternative comments in response to Question 5 are stated below:

- [R10] 'WPC cannot see any reason why other suitable businesses should not be allowed to move on to what are "brown field" sites.'
- [R14] 'The issue of restrictions on the Somerset growing media industry need to be considered on two levels – restrictions on extraction and restrictions on processing facilities'..... 'One approach would be to identify the processing facilities in the most sensitive locations as far as HGV movements are concerned and for policy to designate these as suitable for other uses.'

**[R6.1]** The easing of peat extraction restrictions and the tackling of sustainability issues and national targets are mutually exclusive. We feel that it would be inappropriate to make the assumption that alternative industries would be 'bad', and feel that there is the potential to increase employment through alternatives. We feel that what is important is the sensible management of the types of industry permitted through planning policy and that there is a need for further information, including case studies, to inform the consideration of this issue. We are inclined at this stage to favour the encouragement of light industries, visitor-related and specialised industries to 'fill the gaps' as the growing media industry declines in the area.

## Question 6

Historically there were rail and canal links to the area. If one of these alternative transport options were considered who else could benefit from them and where should they be linked from and to?

Representations from the respondents [R2, 6.1, 7, 11, 17.1, and 16.1] shared similar views in that rail and canal links should be linked to the existing transport networks of Glastonbury, Street, Meare, Westhay, Bridgwater and the Bristol Channel. With the beneficiaries being locals, tourists and the tourism industry, other industrial users and possible passenger traffic (commuters). Examples of comments are as follows:

- [R2] 'The canal option seems preferable if it could be linked with Dunball Wharf or the M5 area. However, the cost of the necessary road bridges would probably inhibit this option even though a navigable system of canals may attract a significant increase in tourism to the area.'
- [R6.1] 'This would have dual benefit through expanding the tourism industry in a way that has less emphasis upon travel on the roads and aiding the filling of the gap created by decline in peat-based growing media industries.'

Representations from four respondents were critical of alternative options, noting the significant investment required, obstacles to overcome and further issues/impacts that could be created. Sample comments are listed below:

- [R4] 'The reinstatement of the rail link will not solve the problems under discussion. It would create further problems by encouraging the importation of other industries into an eco-sensitive area.'
- [R10] 'It is doubtful if either the rail or canal links could be of benefit.'
- [R14] 'Unfortunately, this question is largely irrelevant as use of the historic rail and canal links by the industry is not realistic'.... 'The modern industry developed, however, after both the railway and the canal were closed and has come to rely on distribution by road transport. The obstacles to reverting to rail distribution are now considerable.'

**[R15.1]** Restoration of historic transport links would have a damaging impact on biodiversity and heritage features during construction and operation. It is unlikely that the reinstatement of railways and canals would completely replace the use of roads for commerce. The argument presented in the issues paper that the low quality of the existing road network is a deterrent to other less desirable industries taking over peat processing sites appears to be sound. But, provision of alternative transport links could improve the attractiveness of these facilities to enterprises which could have a negative impact on the area. Further research is needed on possible future uses of the processing sites.

## Question 7

What other measures could be taken to limit the impact of the growing media industry road traffic in the area?

Over half of the respondents replied in their representations to this question. Their comments run as follows:

- [R6.1] 'There appears to be some question regarding the study of HGV traffic. We consider that there is a need for independent surveys to determine the scale and impact of any problems. We would anticipate less of a problem from a growing media industry in decline, but the impact of likely replacement industries needs to be investigated.'
- [R10] 'WPC consider that other than restricting HGV to the most suitable routes to/from the main arterial roads there is little that can be done to limit the impact of road traffic in the area.'
- [R15.1] 'Measures to encourage relocation closer to more appropriate transport hubs outside the area.'
- [R16.1] [R18.1] 'Reduce or cease extraction.'
- [R19] 'With regarding road traffic, a one way system within Sharpham would be very welcoming and easy to implement.'

[R2] The use of smaller trucks for transport from the production area to a distribution centre could be used, as is the case in many large cities. Smaller trucks make more journeys but this keeps larger trucks away from the area. Larger loads can be collected from a distribution centre close to motorways or other main road links for distribution further afield. Limiting the number of vehicle movements may simply increase the size of those vehicles. This in turn puts pressure on rural roads.

[R17.1] Local agreements on suitable routes for HGVs or reduction in size of vehicles.

Promote bulking-up sites on the periphery of the Levels to keep the heavy lorries off the more vulnerable roads and away from villages with narrow streets/old properties.

(Both the above could have financial implications for producers, who would compensate?)

Weight limits on some of the smaller, most subsidised roads.

## 8. Restoration

### Question 8

What restoration options should be encouraged and what constraints should be applied?

The responses to Question 8 demonstrate similar opinions on the options and constraints, regarding restoration. Encouraging biodiversity and limiting the

depth of peat extraction seem to be two key areas emerging from the responses. Comments are as follows:

- [R4] ‘The peat producing sites should be turned into Nature Reserves and/or fishing lakes.’
- [R9.1] ‘We suggest that there may be a market for reed of appropriate quality for thatching in the wider area, even if it is not the thatch of choice locally.’
- [R10] ‘WPC consider that it is important to ensure that a mixture of restoration options is defined so as to provide a patch work of habitats.’
- [R11] ‘Wildlife and Tourism.’
- [R13] ‘In the main, workings are either filled to become deep waterbodies – often for the purpose of fishing lakes – or are returned to agricultural use. The ecological value of these sites is negligible, and does nothing to contribute to the network of biodiverse areas across the Levels and Moors. For extant permissions, the Trust would expect to see ecological restoration principles applied that led to the restored workings contributing to the biodiversity resource of the local landscape.’
- [R15.1] ‘The core strategy must reinforce requirements to manage voids in peat soils created through completion of extant permissions to maximise future benefits for biodiversity and sustainable rural industries (such as reed production). The core strategy must also restate the importance of not exhausting peat deposits, but retaining peat bases in voids and leaving more natural edges to benefit biodiversity.’
- [R17.1] ‘Afteruse could be zoned better – e.g. at present shooting takes place in close proximity to nature reserves with potential for disturbance. Restoration requirements for new extraction areas should reflect adjacent land uses and conservation value.’
- [R20] ‘Consideration ought to be given to constraining the depth of working in certain areas in which it is decided to seek particular kinds of restoration for conservation ends.’

**[R12]** We would like the core strategy to restate and prioritise nature conservation as an afteruse for extant permissions (and future permissions, if any), although our view is tempered by a desire not to see further extraction at all. Any permissions must seek to retain significant peat bases to any void in order to allow the re-establishment of active lowland peat mire where this is possible and the promotion of wetland mosaics, including reedbed, especially in the vicinity of existing high quality nature conservation sites in the Shapwick Heath/Westhay/Ham Wall area. This is best provided through a strategic afteruse map as an appendix to the Minerals Core Strategy.

**[R18.1]** All extraction methods involve clearance of the surface vegetation and site drainage. Irrespective of the method employed, the site drainage and subsequent surface layer removal cause irreversible damage to the ecosystem.

Agree with guidance in MPG1 that “Wherever possible, subsequent restoration of such sites should give priority to wetland rehabilitation and to

the enhancement of the nature conservation resource". A Report of the Working Group on Peat Extraction and Related Matters (Communities and Local Government Publications, 1999) concluded that the priorities should be: (a) to protect areas of high conservation value (primary bogs in condition classes P1-P4, or secondary peat surfaces containing valuable peat forming species from future development; and (b) to ensure that all damaged areas were reclaimed to a beneficial use (generally wetland habitats) once peat extraction ceased.

## Question 9

With the right constraints could peat extraction positively contribute to the local environment? For example could shallow peat extraction be harnessed to finance more peat-forming habitat as demonstrated in Germany? Or recreate a large shallow lake with habitat and tourism opportunities?

Sixteen of the representations answered this question with five of these stating that peat extraction can not positively contribute to the local environment, however some representations state otherwise. On the whole the representations stated that shallow peat extraction wasn't viable, and environmental issues aside, due to land ownership being small and fragmented a large shallow lake would be problematic. Comments are reproduced below:

- [R4] 'Extensive damage has already occurred and further peat extraction will not positively contribute to the local environment.'
- [R13] 'Peat extraction is not a sustainable land use. It is an ecologically destructive enterprise with cumulative negative impacts upon the wider environment. The peat which forms the substrate for the habitats of the Levels supports an increasingly rare and rich array of flora and fauna.'
- [R15.1] 'Nature conservation benefits must not be a driver for further peat extraction, no matter how it is constrained by requirements to add environmental value after completion.'
- [R16.1] 'Highly unlikely given the disparate ownership of the moors and the small field size. The situation is very different to the German bogs.'
- [R17.1] 'Restoration of peat extraction sites can be said to have positively contributed to the natural environment in respect of Ham Wall, Greater Westhay and parts of Natural England reserves. However the resultant habitat is not the same as that which was lost – has biodiversity increased or decreased overall?'
- [R19] 'No peat extraction could positively contribute to the local environment. In the past, shallow peat extraction was used but this was unsuccessful. If you shallow dig the peat producers would then want more ground for excavation.'

**[R6.1]** Whether or not peat extraction could positively contribute to the local environment, given the right constraints, depends on the value of what is lost and on the need for, and value of, what is created. It is very easy for policy-makers to point to benefits of a particular method whilst not investigating the

actual scale of the deficits. Whilst we appreciate that it is not easy to quantify value of biological resources and not easy to estimate revenue generated by increased visitors and community well-being associated with those resources, we are concerned that the sum of those value judgements across the country has diminished both the quantity and quality of natural resources and ecosystems year on year. If the ecosystems approach of its UK Sustainable Development Strategy is to be adopted, it is clear that a far more proactive approach to preservation and enhancement of the biological natural resources of this country is required across the board.

**[R14]** Peat extraction has already positively contributed to the local environment. Without the peat industry many of the SSSIs and other nature reserves in the area would either not exist or would be very different in character.

The possible use of shallow peat extraction to finance *sphagnum* peat forming habitat is very unlikely to be viable. Owing to the requirement for a pen level restoration the depth of working necessary to create a peat forming habitat of the type created in Germany would be very shallow after removal of the topsoil unridings. Whilst the industry might be willing to carry out this work on behalf of a conservation organisation on a contractual basis, the value of the peat extracted would be very unlikely to exceed the cost of obtaining planning permission, opening the site up and restoration. If SCC wishes the industry to consider following this route very large areas would need to be designated as Areas of Search, for example the entirety of Queens Sedgemoor to the north of Glastonbury. Instead it is better to focus on restoration to conditions that may eventually lead to conditions favouring the formation of sedge peats.

## 9. Habitat and archaeological designations

### Question 10

Some operators argue that the artificially high cost of land within the peat production zones (PPZs) would fall (see Economics section of the paper, pg 8) and the pressure to maximise extraction would be reduced, enabling operators to manage their sites in a more environmentally sensitive way, for example by leaving more peat in the excavation margins and base and forming more naturally shaped water bodies.

Given the level of designations in the peat area should the additional constraint of PPZs be removed (Figure 5 in the paper)?

The general consensus from the representations is that the PPZ should not be removed, with a select few representations stating that Areas of Search should either replace the PPZ altogether or be included in a larger PPZ. Comments were as follows:

- [R3] 'This would be pretty catastrophic for those of us who live in the area.'

- [R9.1] 'We would not support the removal of the PPZs, as it may be harder to manage peat extraction without these constraints.'
- [R14] 'Significant constraints to further peat extraction already exist and these are clearly evident from the figures in the SCC consultation paper. There is a strong argument that the additional constraint of the PPZs should be removed, and the experience of recent years adds weight to that argument. Instead the PPZs should be replaced with much larger Areas of Search that guide but do not constrain the industry.'
- [R20] 'Wary about dropping PPZ designation altogether without some analysis of the benefits and disbenefits it has brought to minerals planning in the county. An expanded PPZ that includes the current Areas of Search (and maybe other land) might be a better option than dispensing with the PPZ concept altogether.'

**[R6.1]** Somer Valley Friends of the Earth's view is that the peat production zones constraint should remain, that the possibility of expansion of the zones should be considered. The consultation paper points to the irreplaceable nature of the carbon store, but there is a need to properly evaluate whether or not other aspects of this resource fall into the category of 'irreplaceable'. The paper points to one of the selling points of peat products as low price, and also points to the unsustainable nature of some of the after-uses. The industry is concerned over cost of after-use options and looks to offset this cost through having less restriction on available peat production area. This suggests to us that peat products do not reflect in their price the environmental cost of production. This is simply unsustainable. The environmental cost should be passed down to the consumer. If peat products more properly reflected the actual cost of their production, this would help to address the problem of the majority of amateur gardeners choosing the less sustainable option. That would be in line with the Government's aim to encourage consumers to choose responsibly, as set out in the UK Sustainability Strategy. If the Authority put in place policies that help to bring this about, it is leading by example - also in accordance with the UK Sustainability Strategy.

The consultation paper puts forward no evidence to justify a trade-off in favour of the industry's preference - *"Any trade-offs should be made in an explicit and transparent way"* - UK sustainability Strategy.

**[R15.1]** The argument that restriction of peat extraction to the PPZs has inflated land prices is not convincing as the value of all farmland has risen sharply over the past two decades.....Given that the PPZs are not the sole determinant of land prices, it seems unlikely that their removal would precipitate a fall in land value, leading operators to reduce extraction while maintaining viable profit margins. If extant permissions are completed, then this should be undertaken in an environmentally-sensitive way in any case, although this would still represent a cost to society in contributing to man-made climate change.

**[R16.1]** The PPZs were partly created to limit destruction of known archaeological sites. This argument still applies. If the PPZ restriction is lifted, extraction would become cheaper and would allow peat based products to increasingly undercut peat alternative products in the market place. This is contrary to government objectives. Perhaps the MPA should seek to make extraction more expensive by increased restriction? This would make peat alternative products more financially attractive to consumers by comparison.

## 10. Climate change and carbon storage

### Question 11

How important is it to preserve the carbon store within Somerset's peat deposits?

Fifteen representations responded to this question, of those 15, 14 representations agreed that it is important to preserve the carbon store within Somerset's peat deposits, with one stating it was not important. Sample comments are as follows:

- [R4] 'This is very important given the national targets for reducing carbon emissions.'
- [R6.1] 'Preservation of this resource integrates well with the precautionary approach to biodiversity and habitat protection advocated by the Government.'
- [R11] 'This is not seen as important.'
- [R12] 'We would urge the county council in the Minerals Core Strategy to provide policies which seek to retain all remaining peat soils in the Brue valley as part of a wider sustainable strategy and its commitment to tackle climate change.'
- [R15.1] 'Given that the peat lands of the Somerset Levels & Moors represents an important store of sequestered carbon in the UK, Somerset County Council should seek to protect remaining deposits from exploitation to avoid fuelling global warming.'
- [R17.1] Very – this seems an ideal way to reduce carbon emissions – stop extracting, it is not essential to life. Alternatives to peat are available even if not as effective, however don't know what gases may be given off in the production of these (composting etc.).

**[R13]** Studies indicate that the Levels represent a sizeable source of sequestered carbon. Of the 10.9 million tonnes of carbon estimated to be stored within the Levels, approximately one third of this is held within the top 1 metre of peat. Desiccation of surrounding deposits contributes further to emissions. Rapid, human mediated climate change is one of the biggest threats facing Somerset's wildlife, and steps to allow adaptation in a heavily fragmented landscape need to be taken: a reduction in activities contributing to climate changing gases combined with a landscape-scale conservation

approach to restore, recreate and reconnect biodiverse habitats, and rehabilitate ecosystem functions. The future cessation of peat extraction on the Levels, with a view to restoring habitat and protecting ecosystem functions has got to be the long-term aim of the Minerals Authority. However, consideration of a mechanism to support those landowners who are managing their land responsibility for biodiversity – and an incentive to those who are not - should be made: recognition of the benefits such practises bring to the wider society through preservation of ecosystem services is needed, and the practicalities of establishing this should be explored.

**[R18.1]** Within the recent report 'Carbon Storage and Sequestration in the Somerset levels' (Brown, Nov 09). This report concluded that the effect of peat extraction at current rates of 84,000 m<sup>3</sup> yr<sup>-1</sup> when averaged over the area of the Levels and Moors is 7 t C km yr<sup>-1</sup>. Over the County as a whole it contributes approximately 2% of the County's carbon emissions through soil losses although the area worked per year is only around 0.001% of the county. One cubic metre of extracted peat will eventually release some 50 kg of carbon dioxide (Alexander et al, 2009) and further CO<sub>2</sub> is released from the drained, degraded peat land surfaces prepared for peat extraction.....

.....The importance of preserving the carbon store within Somerset's peat deposits is further highlighted in Defra's 'Safeguarding Our Soils' Strategy. One of the actions is a new goal to significantly reduce the rate of loss of stored soil carbon by 2020.

## 11. Agriculture

### Question 12

As climate change and population pressures increase agricultural land may become more of a premium. Should we remove the opportunity for future generations to access agricultural land by excavating our peat soils and leaving water filled lakes?

Over half of representations stated that we should not remove the opportunity for future generations to access agricultural land by excavating our peat soils and leaving water filled lakes. However some representations demonstrate the potential benefits that water filled lakes can create. Sample comments included:

- [R3] 'We definitely should not be removing the opportunity for future generations to access agricultural land by excavating our peat soils and leaving water filled lakes.'
- [R10] 'It is important that agricultural land is retained and not lost to peat extraction. As the question indicates the climatic and population pressures will increase and once lost the land is effectively lost for ever.'
- [R17.1] 'Excavation of peat is primarily for the horticultural (garden) market not the agricultural (food) market. It is largely used to grow non-essential

plants whereas left undisturbed it can be of benefit in agriculture. Kept as pasture for grazing it can be a carbon sink (sequestration).'

- [R19] 'By allowing more peat extractions within the area, we are stealing valuable agricultural land. Over the years wildlife are moving closer and closer to our towns because their natural habitat is being destroyed by peat excavations. What is happening to England's green and pleasant land in this area? It is becoming a huge mass of water.'

[R2] In previous years, worked areas were filled and returned to agriculture or industrial uses. This process seems to have stopped and now the workings just fill with water. Perhaps the possibility of filling with inert waste should be looked at, which would save other land fill sites and provide reasonably priced agricultural land. This is a process common with other open cast mines or quarries, but does increase road transport while work to restore the land in progress.

[R15.1] Predicting the future use of farmland in the PPZ is more complicated than interpreting the Agricultural Land Classification. The viability of farmland in the PPZ is influenced by a range of socio-economic and environmental factors, and some areas within in the zone are becoming increasingly marginal for agricultural production as a consequence of market forces, policy changes and societal changes. Predicted climate change impacts are likely to increase the difficulty of pastoral farming in this area as the area is expected to become wetter for longer periods from autumn to spring, and hotter and drier in the summer. However, the presence of bodies of open water and reedbeds will not only benefit biodiversity, but offers the prospect of future small-scale sustainable wetland farming enterprises through aquaculture for fish production and reed growing for the construction industry.

## 12. Other issues

The development of a method of sustainable peat regeneration was included in one representation [R1]. The representation describes the process of artificial peat regeneration by the displacement and amalgamation of natural peat land vegetation.

In particular one respondent [R3] has given an explanation of the human cost of the peat industry. This representation emphasizes the conditions local residents near to peat workings experience, for example; shaking to buildings during works; subsidence of buildings; ongoing damage to property and land and the negative side affects to the environment, wildlife and people.

One respondent [R8.1] has highlighted how all relevant works should be undertaken in accordance with the Environment Agency's guidance on peat extraction adjacent to watercourses.

### **13. Feedback on the consultation**

The format of consultation gathered a few comments, which were:

- One respondent [R1] stated 'you are applying mineral rules to peat production which is incorrect and totally wrong, peat is preserved vegetation that has grown on turbarry land.'
- One respondent [R4] found the Somerset Peat Paper to be a balanced and well considered document with the exception of the comments on the HGV study.
- An additional respondent [R21] also complemented the document as being 'excellent.'

### **14. Concluding remarks**

In conclusion, the Somerset Peat Paper received 21 representations from a variety of consultees. The key messages from these responses are detailed below:

#### **14.1. Limit further land available for future peat extraction**

Seventeen representations commented on this point with 12 stating that it was appropriate to limit further land available. Somer Valley Friends of the Earth stated how it is clear that the previous policies adopted by authorities in the UK have not been sufficiently effective in meeting the government's target of 90% of the growing media market being non-peat and therefore sustainability objectives are also not being met. More robust measures will be necessary in order to help to reverse the effects of failure to achieve the 2010 target.

#### **14.2. Economic value of the growing media industry to Somerset and rural economies in Sedgemoor and Mendip**

Opinion was divided equally whether or not the growing media industry was significant to the rural economies of Sedgemoor and Mendip. Economic impact is both direct, in terms of employment and expenditure but also indirect. For example, a significant proportion of the transport, engineering, electrical, chemical and accountancy providers are located within Mendip and Sedgemoor. However it is also felt that the growing media industry employs few people and reduces the income from tourism and Nature Reserves which are much more important to the community.

#### **14.3. A range of views to consider when considering if extraction of Somerset peat is essential for the growing media industry in Somerset**

A mixed response of positive, negative and balanced comments were received, therefore highlighting that this area needs to be given careful consideration.

#### **14.4. Key factors that influence the economic viability of the growing media industry**

The key factors which were mentioned on multiple occasions were; land price; production costs and demand for the product; transport, access to road and transport links and closeness to the source and distribution points. With

factors such as quality and availability being mentioned less frequently in the representations.

#### **14.5. Transport remains an area of controversy**

Similar views were shared in relation to alternative transport options; where new rail and canal links should be linked to existing transport networks in the area, with the potential beneficiaries being locals, tourists, tourism industry and other industrial users. However it was noted that significant investments would be required, obstacles would have to be overcome and further issues/impacts could be created due to this.

A variety of comments were received on Question 7 (what other measures could be taken to limit the impact of the growing media industry road traffic in the area), it is still evident from the comments received that transport is still a highly sensitive area which needs consideration. The impact of likely replacement industries needs to be considered, especially for sites that have B2 use.

#### **14.6. Restoration is key**

Similar opinions were displayed on the options and constraints relating to restoration. Encouraging biodiversity and limiting the depth of peat extraction were two key areas that emerged from the responses.

Some representations stated clearly how peat extraction can not contribute positively to the environment as the resultant habitat is not the same as that which was lost. However it is believed that many of the nature reserves in the area would not exist without the peat industry.

#### **14.7. The PPZ should stay**

The majority of representations believed that the PPZ should stay, with some comments stating that consideration should be given to the possibility of the expansion of the zones and/or Areas of Search.

#### **14.8. Somerset's peat carbon storage is vital**

Of those who responded to Question 11 (How important is it to preserve the carbon store within Somerset's peat deposits), 15 representations agreed it is important to preserve the carbon store within Somerset's peat deposits, especially in light of national targets for reducing carbon emissions.

#### **14.9. Agriculture land remains important**

It was illustrated through the responses that we should not remove the opportunity for future generations to access agricultural land by excavating our peat soils and leaving water filled lakes, with 10 representations agreeing. However the potential benefits for biodiversity and the presence of bodies of open water and reed beds was also stated.

The MCS needs to ensure future peat production areas are identified to maintain a viable peat extraction industry, with associated economic benefits and in accordance with government aims for the use of peat materials. Any new planning permissions will need to have a particular focus on

environmental, heritage and transport issues together with the restoration and after use of extraction sites.

## 15. Appendix A – Consultee’s

<b>Specific Consultation Bodies</b>	Oak Tree Peat Products
Government Office for the South West	Tor View Peatworks
SW Councils	Chapmans Peat Supplies
Natural England	Autumn Leaves
Environment Agency	Woodland Horticulture Ltd
English Heritage South West Region	Delphan Peatworks
South West Regional Development Agency	Fir Tree Farm
Wessex Water	Somerset Association of Local Councils
Bristol Water	
South West Water	<b>District Councils</b>
	Mendip District Council
<b>General Consultation Bodies</b>	Sedgemoor District Council
CPRE	
The RSPB (SW)	<b>Parish Councils</b>
Somerset Wildlife Trust	Ashcott Parish Council
Forestry Commission (SW)	Bawdrip Parish Council
Mendip Environment Forum	Burnham Without Parish Council
Country Land and Business Association (CLA) Crown Estate Office	Burtle Parish Council
Frieght Transport Association	Catcott Parish Council
Friends of the Earth (SW)	Cheddar Parish Council
Somer Valley Friends of the Earth	Chilton Poldon Parish Council
Somerset Drainage Board Consortium	Cossington Parish Council
National Farmers Union	Edington Parish Council
Minerals Products Association	Godney Parish Council
Internal Partners	Greinton Parish Council
	Mark Parish Council
<b>Consultants</b>	Meare Parish Council
Clarkewillmott	Moorlynch Parish Council
Cooper & Tanner	Puriton Parish Council
Atkins Ltd	Shapwick Parish Council
Land & Mineral Management Ltd	Sharpham Parish Council
Peter Brett Associates	Stawell Parish Council
S L R Consultancy Ltd	Street Parish Council
	Walton Parish Council
<b>Growing Media Industry</b>	Wedmore Parish Council
Terraqueous Ltd	Wookey Parish Council
Church Farm Horticultural	Woolavington Parish Council
White Moss Horticulture	Glastonbury Town Council
Abbeymoor Peat Works	Glastonbury Chamber of Commerce
E J Godwin (Peat Industries) Ltd	
Magnolia Peat Products	<b>Councillors</b>
Vapogro Ltd	Sedgemoor District Councillors
Violet Farm Peat Products (Avalon Peat Supplies)	Mendip District Councillors
Atlasta Farm	SCC Councillors
Durston Garden Products	
Marsh's Peat Products	<b>Internal Colleagues</b>