

Matter 8: Peat – SPPA Response to Inspector’s Issues & Questions

Issue: Whether the strategy for peat is the most appropriate.

The SPPA responses are set out below in italics, with questions grouped together where relevant. The content of the SPPA response to the January 2013 ‘Minerals Preferred Options’ paper has not been replicated, unless directly relevant. It should be noted at this stage that the SPPA is broadly supportive of the modifications proposed by SCC but has serious concerns that there remains insufficient flexibility with respect to peat policies in the current draft of the SMLP.

1. What is the demand for peat? Is demand accurately reflected in the Plan?
2. Are there sufficient reserves to meet demand over the Plan period?

The SPPA agrees with the SCC peat reserve figures, but continues to work with SCC to refine the demand for peat figure and is in the process of producing a Statement of Common Ground dealing with this issue. The Inspector is referred to the SPPA response to the January 2013 ‘Minerals Preferred Options’ paper.

The SPPA does not believe that there are sufficient reserves of peat over the Plan period. Annual supply is a function of surface area available for harvesting, not total reserve. SCC must provide details of the assumptions made regarding reserves, surface area and annual harvest. The question of availability to individual companies rather than the industry as a whole has also been inadequately addressed as uneven availability could give rise to significant imports. The SPPA also questions the linear model used and more detail is provided as this approach is not consistent with DEFRA modelling.

3. Please provide relevant extracts of the Sustainable Growing Media Task Force Report 2012 (with cover sheet). What is the current position relating to the Task Force?
4. What is the direction of travel of some of the Task Force discussions referred to in the Plan?
5. Please provide details of relevant parts of the Government’s response to the Task Force (with cover sheet if available).

The Inspector is referred to the SPPA response to the January 2013 ‘Minerals Preferred Options’ paper. In the event that SCC is unable to supply relevant documents or if further documents are published the SPPA is happy to assist the Inspector by providing copies of anything required.

6. Should the “Somerset question” be given further consideration and are there any peat resources that could be responsibly sourced? Give details, as appropriate.

The “Somerset question” must be given further consideration as it has now been accepted that some peat sources are less responsible than others. Very significant quantities of peat are extracted in the EU outside of the UK, in Ireland for example. It is suggested that the Inspector search for locations such as Athlone and Edenderry in Ireland on Google Maps. Viewing the satellite images and zooming out shows the vast tracts of actively worked peatland in the Irish Midlands.

With such a significant volume of peat so close to the English market it is inconceivable to think that it will not be imported if resources are not available in the UK. Policy should acknowledge this reality. To import peat when more responsible sources are available in England but sterilised by planning policy is perverse. To do so when a scheme is in place demonstrating that this is the case, which is exactly what the ‘Responsible Sourcing Scheme’ under development will do, would be insanity.

7. Is Policy SMP6 compliant with Government policy? Explain.

Policy SMP6 complies with Government guidance set out in the NPPF, but that is guidance only which does not account for the specific circumstances in Somerset. SMP6 fails to account for the direction of peat use policy development and the reality of the position. It would be far more responsible to allow further peat extraction planning permissions with high standards of environmental protection in Somerset than to import peat.

8. Is Policy SMP6 deliverable and has it taken sufficient account of viability/economics?

The Somerset and English growing media industries must compete in the EU marketplace and SMP6 does not take sufficient account of economic reality. The Inspector is referred to the SPPA response to the January 2013 ‘Minerals Preferred Options’ paper. The best way to drive peat reduction is not to deprive English based producers of a raw material that remains crucial in the marketplace. Instead, continued provision of access to peat from responsible sources allows the English industry to compete with those importing peat based products from elsewhere in the EU and still promote peat reduction over time. If English producers are no longer able to compete this will not occur.

9. Overall, is Policy SMP6 justified and does it strike the right balance? Briefly explain.

SMP6 fails to strike the right balance and this is evidenced by considering recent policy developments in Scotland.

The document ‘Scottish Planning Policy’ (SPP) was published as recently as June 2014 and sets out Scottish planning policies with the objective of delivering four outcomes: ‘a successful, sustainable place’, ‘a low carbon place’, ‘a natural resilient place’ and ‘a more connected place’. The key

policy principle is that 'this SPP introduces a presumption in favour of development that contributes to sustainable development'. The SPP is therefore similar to the NPPF in England.

In the section 'A Natural, Resilient Place' under the heading 'Valuing the Natural Environment' and the sub-heading 'Development Management', paragraph 205 of the SPP states that:

'Where peat and other carbon rich soils are present, applicants should assess the likely effects of development on carbon dioxide (CO₂) emissions. Where peatland is drained or otherwise disturbed, there is liable to be a release of CO₂ to the atmosphere. Developments should aim to minimise this release.'

Protection of peatland is therefore a priority in Scotland. In the same section paragraph 241 deals with peat extraction under the heading 'Promoting Responsible Extraction of Resources' and the sub-heading 'Development Management' states that:

'Policies should protect areas of peatland and only permit commercial extraction in areas suffering historic, significant damage through human activity and where the conservation value is low and restoration is impossible.'

In Scotland it therefore remains a possibility that new peat extraction planning permissions could be granted, subject to the specific conditions set out. Commercial extraction will only be permitted where 'restoration is impossible', which must mean impossible without significant human intervention, rather than simply a change in land management. Examples would be where archaic peatland had been drained and converted to agricultural use or bog vegetation had been lost and the peat surface destroyed owing to the establishment of coniferous plantation forestry.

Under such circumstances simple changes in land management would be insufficient to bring about restoration, whereas permitting peat extraction could facilitate eventual restoration. The SPP shows the thinking of another Government within the UK itself, and many EU Governments remain committed to exploiting their peat resources. It is against this backdrop that SMP6 must be judged and, with Somerset a potential model for responsible sourcing in future, the correct balance has not yet been found.