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16 December 2014

Dear Guy

### **Somerset Mineral Local Plan Modifications Consultation**

Thank you for seeking the RSPB's views on the proposed modifications to the Somerset Minerals Plan ('the Plan').

#### Ref 12 - new para 8.6

We **SUPPORT** recognition in the Plan of the importance of areas outside designated sites for SPA and Ramsar species.

#### Ref 13 - para 8.19

It is clear from national policy statements that **government does not foresee any need for further indigenous peat extraction to meet anticipated demand to 2030**. We do not believe the deleted phrase is therefore too prescriptive or makes the Plan less flexible with reference to peat extraction, but accords fully with the direction of travel of national policy. We therefore strongly **OBJECT** to the deletion of this phrase.

#### Ref 14 – para 8.21

There is no clear definition of 'reworking' in the document. This needs to be clarified. We do not wish to see reworking leading to a net increase in the volume of peat removed from a site being restored.

#### Ref 15 - para 8.22

We **OBJECT** to the inclusion of the word 'significant'. We do not believe that there should be any net gain in peat volume extracted, nor is it clear how it helps achieve net environmental benefits. The term is also too vague and open to interpretation.

We **OBJECT** to the inclusion of additional small areas of working within an existing peat site since it encourages a net increase in peat extraction from an existing site.

We **SUPPORT** the removal of the reference to possible spatial extensions to existing peat permissions.

Ref 16 – SMP6

We **SUPPORT** the proposed changes policy SMP6. This now places due emphasis on the need to seek biodiversity gains as the primary objective of the policy in this exceptionally important area for nature conservation.

Ref 22 – para 10.17

We **SUPPORT** the proposed changes to this paragraph, which clarify the after-use objectives of peat site restoration.

Ref 30 – new para 14.11

We **SUPPORT** inclusion of this paragraph. The offsetting approach is not appropriate for European sites or Ramsar wetlands.

Ref 36 – new para 16.6

We **SUPPORT** inclusion of this new paragraph.

Yours sincerely



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