Application number 13/0842W
Peat processing and bagging plant, Wilmslow Peat Farm, Moor Lane, Wilmslow SK9 6DN.

Overview

Contrary to the applicant's submissions, the winning and use of peat is considered unsustainable and any extensions to existing operations will reduce the driving force to invest in and manufacture non peat alternatives. Even more important, the restoration of the site is urgent if we are to secure timely biodiversity and climate change benefits. In working this particular site the applicants have not demonstrated themselves to be fit and proper persons. They have not implemented the conditions attached to their permissions and as a direct consequence the protected habitat for water voles have been lost. More importantly, by failing to maintain water levels this has allowed the peat to dry out and the benefits of it as a carbon sink has been lost. In fact, the drying out of the peat has released carbon dioxide into the atmosphere contrary to climate change initiatives and this extends to areas well beyond the application site.

As a consequence, this application should be looked at as the one to further extend the transgressions already experienced and should be strongly resisted. This is reinforced by the fact that the processing and bagging plant has not been used for the last 10-years and is unlikely to be used now as the peat won from Wilmslow is extremely low grade and needs sweetening with other sources, even for basic uses. This presents two options. First, that any peat won from the site would be exported from the site to one with better quality peat, as happens at present. More likely, permission to retain and extend the consent period for the peat processing and bagging plant would involve importing peat from other sources, probably abroad. The Government has no power to stop imports from outside the UK.

In conclusion this application should be refused.

Supporting arguments

In both the White Paper "Natural Choice: Securing the Value of Nature" and the numerous consultative and other documents that were produced beforehand, the Government makes it clear that the use of peat in horticulture is unsustainable. Areas of lowland raised bog are a rare and threatened habitat, but crucially they also act as important carbon stores. Thus, the protection of peat sites and sensible and timely restoration are important for reasons of biodiversity and climate change.

The National Planning Policy Framework (the Framework) published in March 2012 does not require local planning authorities to identify new peat sites and indicates that planning permission for new or extended sites should not be forthcoming. More relevant in this case, it is recognised that the

Framework does not preclude planning permission for continued peat extraction on sites that have already been worked for peat. Notwithstanding, this does not mean that proposals on existing sites should automatically be approved. It means that careful consideration needs to be given to each case looking in particular at the consequences for climate change and biodiversity.

A recent appeal decision at Chat Moss, Irlam (8 November 2012) has confirmed the Secretary of State's view that extension should not only refer to the area of a site, but to any extensions in time. This is exactly what is proposed here with the amending of the two conditions.

It is recognised that the Framework requires the economic benefits of mineral extraction to be given significant weight, but this has to be set within the context of the Government's view that the use of peat in horticulture is unsustainable. Also, it needs to be set against the consequences of peat extraction on climate change and biodiversity. To give effect to the Government's view that the use of peat is unsustainable, the White Paper seeks to phase out the use of peat for horticultural purposes to zero.

Whilst it was previously identified that there were sufficient reserves of peat to meet 6-years of use, the Framework includes no land bank requirements for peat extraction. Of note, the Government has taken steps to acquire a site producing substantial quantities of peat for nature conservation purposes. This action is a clear indication that the Government does not view the maintenance of a 6-year supply of peat as being critical to enable there to be a smooth transition to zero use of peat in the horticultural sector.

While it is argued here that the restrictions imposed by Government will make the existing consented reserves more important, with the implication that this would lead to higher rates of extraction and earlier restoration, this is not borne out by this application. This application does nothing to shorten the life of the Wilmslow Peat Farm site. On the contrary, it would extend it.

The higher costs associated with importing peat may well have some cost advantages in respect of developing and bringing forward non peat substitutes. As English peat is the cheapest peat for the English horticultural market, the extraction of peat from English sources may have a deterrent effect on encouraging investment in the manufacture of non peat substitutes. As the plant is not used, there would be no loss of local employment opportunities. On the other hand, investment in the manufacture of non peat substitutes would, in the longer term, create employment and support the Government's aim of being a leader on sustainability and the environment.

The extended extraction of peat from the application site would result in substantial emissions of CO_2 with the attendant impact on climate change. Any notion that there would be less climate change impact if the application site was to be worked from than peat imported from Eire or the Baltic is

illogical. In any case, to prefer domestic sources of peat rather than go for imports would be counter to the Government's objective of being an international leader in reducing the impact of development on climate change.

The site has Habitat Annex I status recognising its value as a degraded lowland raised bog. Having failed to meet the timeframe for a restoration proposal, the restoration objective on the application site is unclear. However, the grant of planning permission here could delay by many years the restoration to lowland raised bog. In any case, there must also be doubts as to the applicant's ability to achieve the required restoration in terms of the poor restoration results achieved by the applicant so far. If the Council takes the necessary action (not something that has happened so far) the restoration to realise the nature conservation value of the site is capable of being realised under the existing planning conditions. Moreover, if the water table is maintained at the level proposed, there would be instant biodiversity and carbon benefits without needing to wait.

In addition to local policy, the proposals would also be contrary to RSS Policy DP9 which requires proposals, as a priority, to contribute to reducing the region's CO_2 emissions.

In respect of national planning policy as reflected in the Framework, the proposals would be contrary to paragraph 14 which has a presumption in favour of sustainable development. Government policy as expressed in the White Paper, and also in the raft of documents supporting the preparation of the White Paper, indicates that the use of peat for horticultural purposes is unsustainable and the identification of lowland raised bog as a rare and threatened habitat and as important carbon stores.

The proposal also conflicts with paragraphs 93 and 118 of the Framework, which seek to secure reductions in greenhouse gas emissions and conserving and enhancing biodiversity. Any delay in restoring the site, which would result from any encouragement to the proposed continuation of peat extraction and the uncertainties associated with the proposed restoration scheme would be contrary to paragraph 144 of the Framework, which seeks restoration at the earliest opportunity to high environmental standards.

Passing reference has been made to the applicant's performance on the application site. This has been lamentable, with breaches of conditions and a failure to submit a cogent restoration scheme. The consequences have been to dewater the entire area, allowing peat deposits external to the application site to dry out with the consequent emissions of the carbon dioxide and the loss of the carbon sink over a wide area. In addition, the failures of the management of the peat workings have resulted in numerous nearby buildings rapidly accelerating towards structural collapse.

#