

STATEMENT OF THE REASONS FOR THE FORESTRY COMMISSION'S DECISION TO GRANT CONSENT

1. Location and Owner

Black-brook Plantation (also known as Gib Tor) is located near Leek on the Staffordshire Moorlands of the Peak District National Park and is owned and managed by the Staffordshire Wildlife Trust.

2. Legislative Background

2.1 The Environmental Impact Assessment (Forestry) (England and Wales) Regulations 1999 (referred to subsequently as the Regulations) prohibit the carrying out of any work or operations in relation to a project which is a "relevant project" (as defined) unless consent has been obtained from the Forestry Commissioners or, on appeal, the appropriate Authority (the Secretary of State for Environment, Food and Rural Affairs in England).

2.2 Regulation 3 defines a "relevant project" as one of four types of forestry project:

- i) Afforestation;
- ii) Deforestation;
- iii) Forest Roads; or
- iv) Forest Quarries;

which does not constitute development included within the scope of the Town and Country Planning EIA Regulations but which is likely to have substantial effects on the environment.

3. History of the Proposals

3.1 On 27 May 2010, the Staffordshire Wildlife Trust (the *proposer*) formally sought an opinion from the Forestry Commission on their proposals to restore 14 hectares of conifer plantation located near Leek on the Staffordshire Moorlands of the Peak District National Park to a mosaic of upland heath, blanket bog and semi-natural grassland to be managed for nature conservation. The Forestry Commission, having gathered further information and having discussed the proposals with local interests and other agencies, decided on the 3 June 2010, that the proposals constituted a relevant project and that due to the significant impacts on the environment, consent was required under the Regulations.

3.2 In order to clarify the issues to be addressed by the Environmental Statement, the *proposer* convened a scoping meeting, involving stakeholders, on 30 July 2010 at the Meerbrook Village Hall, near Leek. Minutes of the meeting, prepared by the *proposer*, were received on 11 August 2010 by the Forestry Commission. The issues identified during the scoping process to be addressed in the Environmental Statement included the potential impacts on human beings; flora; fauna; soil; water quality; landscape; climatic factors and material assets including the cultural/archaeological heritage. Confirmation of the issues to be addressed was agreed by the Forestry Commission with the *proposer* on the 18 August 2010.

3.3 The *proposers* also held a public consultation workshop on the 30 September 2010 at Flash Village Hall near Buxton to brief stakeholders on their developing proposals.

3.4 On the 6 October 2010, the Forestry Commission received an Environmental Statement for the proposals. The Forestry Commission informed the *proposer* on the 25 October 2010 that further clarification was required on the susceptibility of the plantation to wind damage before the Environmental Statement could be formally accepted. Following advice from Forest Research the proposals were modified to retain for a longer period specific areas of the plantation that had been assessed as more resistant to the effects of strong winds. A revised Environmental Statement was received on the 6 April 2011 and was formally accepted by the Forestry Commission on the 6 April 2011.

3.5 In agreement with the *proposers* formal consultation commenced on the 15 April 2011, ending on the 20 May 2011. Consultees included Natural England, Peak District National Park Authority, Staffordshire Moorlands District Council and the Forest Neighbours. At the same time, public notices were also placed in the Leek Post and Times and the Your Leek newspapers.

4. Summary of consultation responses

4.1 A total of 19 written responses were received by the Forestry Commission, 2 from statutory bodies, 5 from local authorities, organisations and groups and 13 from members of the public. A detailed analysis of the consultation responses (*Black-brook EIA Table of Responses to Consultation April-May 2011*) is available upon request.

4.2 The **Friends of the Peak District** run by the **Campaign to Protect Rural England**, the **Royal Society for the Protection of Birds**, **West Midlands Bird Club**, **Staffordshire Mammal Group** and **seven members of the public** were fully supportive of the proposals. **Natural England** supported the approval of the proposals subject to some minor amendments/clarification to the restoration works. Whilst broadly accepting the proposals, the **Peak District National Park Authority** had a number of specific comments relating to the design of open woodland, creation of wet and open water habitat, tree species and provenance and a concern that there hadn't been a sufficient assessment of cultural heritage features. The **Forest Neighbours**, a group representing local residents, expressed concerns over the EIA process, the restoration proposals, previous site management, funding and consultation procedures and questioned assumptions made in the Environmental Statement concluding by objecting to the proposals on the grounds of the amount to be felled, the short timescale proposed and the proposed method of harvesting and extraction. In addition there were 5 responses from **members of the public** either objecting or offering comments that didn't support the proposals.

5. Explanation of the Forestry Commission's decision and the conditions attached

5.1 The Environmental Impact Assessment Regulations require the Competent Authority (in the case of afforestation, deforestation, forest roads or forest quarries this is the regulatory arm of the Forestry Commission) to consider the impacts of the proposals on:

- i. Human beings, fauna and flora.
- ii. Soil, water, air, climate and the landscape.
- iii. Material assets and the cultural heritage.
- iv. The interaction between the factors mentioned in i. to iii. above

5.2 The following paragraphs outline:

- i); the main reasons and considerations on which the decision is based; and
- ii) a description, where necessary, of the main measures to avoid, reduce and, if possible, offset the major adverse effects of the project.
- iii) the conditions which are attached to the approval

5.3 National Policy Context Relating to Black- brook Plantation

5.3.1 Climate Change Act (2008) sets out the Government's commitments both at international and domestic levels to meet the challenge of climate change. The agriculture and forestry sector contributes 8 per cent of UK greenhouse gas emissions. The major issue for this sector is in tackling direct emissions of nitrous oxide and methane emissions, rather than carbon dioxide emissions.

5.3.2 The Government's approach to sustainable forestry is underpinned by the **UK Forestry Standard** (2nd edition, 2004, currently under revision). The Standard provides the benchmark for judging the performance of the UK forestry sector. It defines criteria and indicators that enable progress in delivering sustainable forest management to be assessed. The Standard includes a series of guidelines which help to identify acceptable options for forest and woodland management and the siting of new woodlands.

5.3.3 Forests and woodlands can provide a rich and diverse habitat for wildlife, much of which benefits from the varied conditions associated with normal management activity. Some species and habitats require special consideration however, and these include those associated with open ground and water. In areas where open ground habitat is rare, it can sometimes be successfully restored by clearance of plantations. Restoration of these habitats may form part of the **UK Biodiversity Action Plan** (1995, page 21).

5.3.4 When to convert woods and forests to open habitats in England: Government policy. In 2010 the Forestry Commission published a policy on when to convert woodland to open habitat. It provides a rationale for site-by-site decision making, balancing the restoration of high-value open habitats and creation of diverse landscapes against the decline of carbon storage associated with the removal of trees and woodland. The policy outlines a balancing mechanism between woodland removal and creation to help achieve this. The key principles are “the right tree in the right place” the “right habitat in the right place” and the “right change at the right pace”. Overall, woodland removal will be balanced with increases in the rate of woodland creation to help achieve Government objectives for a low carbon economy and to ensure the area of woodland in England continues to increase. Local people will be involved in site by site decisions.

5.3.5 Under Section 40 of the **Natural Environment and Rural Communities Act** (2006) it is the duty of the Forestry Commission in carrying out its functions, to have regard, so far as is consistent with the proper exercise of those functions, to conserve biological diversity.

5.3.6 The **Biodiversity Action Plan for the Peak District** (2001) – “A Living Landscape” under section 6.4.6, under “Objectives and Targets” for Heather Moorland states “take opportunities to create moorland with its mosaic of constituent habitats, particularly the recreation of upland heath on former sites”. The target, “by 2010, create or recreate 100ha of upland heathland, with particular emphasis on reducing fragmentation of existing heathland”. The Peak District Biodiversity Action Plan Mid-Term Review (2001 – 2007) conducted during the spring of 2007 reported that 120 ha of heather moorland had been recreated. The target was subsequently increased to 500 ha of heather moorland creation by 2010. The 2011 -20 plan is currently being formulated.

5.4 Analysis of proposals in relation to above policies

5.4.1 In terms of climate change, the overall trend in England is still one of afforestation, with deforestation of around 1,000 hectares a year more than compensated for by new woodland creation at a rate of around 2,500 hectares a year. The deforestation figure includes some 500–1,000 hectares a year, that is restored to priority open habitat. The majority of these are mature conifer woodlands that would have been felled anyway in a conventional rotation. The current balance of woodland removal and creation is adequate to ensure that we do not diminish the existing carbon sink. If a crop is felled at commercial maturity, the timber used rather than being felled to waste and the residues dealt with according to best practice, with minimal soil disturbance, the greenhouse gas emissions associated with the policy can be relatively small, amounting to the difference in long term carbon stocks between heathland and woodland. However, if the rate of deforestation for open habitat restoration increases, steps will need to be taken to ensure the carbon sink is not reduced, however this does not provide a *prima facie* case that priority open habitat creation should not proceed.

5.4.2 Black-brook Plantation is a conifer plantation (total 55 ha) established on open moorland in the early 1970's. The plantation has not been thinned and is reaching economic felling age. The proposals for Black-brook Plantation outline the conversion of 27 hectares of conifer woodland to a mosaic of upland heath, blanket bog, semi-natural grassland (14 ha) and new native woodland (13 ha) which are priorities outlined in the **UK Biodiversity Action Plan** (1995) and **Biodiversity Action Plan for the Peak District** (2001). This work will add to a mosaic of upland heath, blanket bog, semi-natural grassland (23 ha) and new native woodland (5 ha) that has been previously restored during the period 2002- 2007.

5.4.3 The **Open Habitats Policy** (2010) provides a framework to indicate the kinds of sites where the Forestry Commission are likely to allow or support conversion of woodland to open habitat. It is the responsibility of those proposing conversion to open habitat to demonstrate how the proposed project fits with the framework and provide the necessary evidence (summarised below).

- The reversion to open ground extends and buffers areas of blanket bog, dwarf shrub heath and wetland habitat that occurs in the adjacent SSSI/SAC/SPA areas. There are no isolation consequences for any aspect of the new open ground habitats that will be created by the proposals.
- The proposed open ground mostly forms a single management unit, which would be viable from an ecological and management perspective, including the use of conservation grazing.
- SWT manages over 900ha of land across Staffordshire covering a broad range of habitat types including ancient woodland, lowland heathland, unimproved grassland, wetland and upland habitats. The Black-brook nature reserve lies within the Leek Moors SSSI, across the entire SSSI, 88.5% of the designated area is considered to be in favourable condition as defined by Natural England. However all of SWT managed land in the Leek Moors SSSI is considered to be in favourable management.
- The areas chosen for the open ground reversion focuses on the soils that are wet and peaty as far as possible, since these have the potential for the best types of open ground habitats. Desirable species persist in the open areas retained between the planting blocks and in areas of windthrow. The areas already felled and reverted to open ground communities have already demonstrated effective re-establishment in terms of species and speed of recovery.
- Reversion to open ground is normally only permitted if the conifers to be removed are exhibiting poor growth rates. The threshold given is yield class 10. The yield class for Lodgepole pine which constitutes the main tree species remaining, ranges from six to eight.
- Although new woodland planting is only expected under the policy guidance where the benefits of restoring the plantation to open ground are marginal, the SWT proposals include significant native wet woodland creation as part of the proposals. Although this is largely a result of the compromise with the local community, the new planting would cover 19.8ha of the 55.4ha site (and 4.36ha of conifers would remain).
- There is no ancient or native woodland on the site. However, the small areas of willow scrub that occur in some of the current open habitats would be retained in both the new broadleaved woodland and the open ground where they occur in it already.
- The Open Habitat's policy requires the involvement of the local community in the plans for sites where open ground is considered. In this case, there has been a long history of such involvement.

The Forestry Commission consider that sufficient evidence has been provided through the development of the Environmental Statement and that the current proposal now strikes an appropriate balance between the interests of the local community and national policy.

5.5 Time constraints on approval:

The EIA Regulations (18) sets out clear limitations to the duration of consent and our approval is therefore subject to the following conditions:

Condition (a) The work must be started between the 24 June 2011 and 23 June 2016; and

Condition (b) No work shall be carried out after 23 June 2021.

Note: Consent will only cover the first 10 years of the project i.e. those areas identified as Phase 1 and Phase 2 in **Appendix 1** (Figure 11-2 The Proposed Phases of Work 1 -3). As a consequence the *proposer* will need to apply for our opinion as to whether consent for the third phase of felling is required once this consent expires.

5.6 Area approved for Deforestation:

The application is approved subject to the following conditions;

Condition (c) Deforestation (14.85ha) will be carried out only on the areas and in the sequence as outlined below, in **Appendix 1** and in the Environmental Statement (Figure 11-2 The Proposed Phases of Work 1 -3):

Phase	Year	Area (ha)	Compartments	Notes
1	1 to 5	7.91	C1a, part of C4b, C4a and C10a	See Appendix 1 for areas.
2	7 to 10	6.94	C1c, C5a	
		14.85		

Condition (d) The deforested areas (including areas previously felled 17ha) shall be maintained as a mosaic of upland heath, blanket bog and semi-natural grassland. These areas are shown in **Appendix 2** (Figure 11-01 in the Environmental Statement's Final Refined Design).

Condition (e) The areas of woodland to be retained or converted to native woodland (24ha) will be managed in accordance with good forestry practice as outlined in the UK Forestry Standard, published Forestry Commission best practice guidelines, and all relevant legislation. Appendix 1 & 2 show the woodland areas to be retained and created. (See also Figure 11-01 Final Refined Design and Figure 11-2 The Proposed Phases of Work 1 -3).

Phase	Year	Area (ha)	Compartments	Notes
1	1 to 5	9.85	C2a west, C2c, C3, C4b part	Broadleaved woodland
2	7 to 10	1.47	C2a east.	See Appendix 1 and 2 for areas.
3	10 to 15	1.87	C5b	Broadleaved woodland.
3	10 to 15	1.59	C1b	Mixed woodland.
N/A Retained conifers.	N/A	4.36	C8, C9, C4c, C2d, C2e	Retained conifers.
N/A Retained broadleaves	N/A	5.42	C2b, C7	Restored new native woodland areas.
		24.56		

5.7 Impacts on human beings

5.7.1 Local Residents

5.7.1.1 The Forest Neighbours have expressed concerns over the EIA process, in particular questioning the impartiality of the Environmental Statement and the consideration of local opinion through consultation, particularly through Parish Councils. The Forestry Commission notes that Blackbrook plantation has a long and complex history that has seen much debate between interested parties and stakeholders. The Forestry Commission is also fully aware that the National Park Authority in conjunction with Natural England and the Friends of the Peak District have been involved in lengthy negotiations between Staffordshire Wildlife Trust (SWT) and Forest Neighbours (FN) over many years.

5.7.1.2 In addition to the concerns of Forest Neighbours, one person offered comments highlighting and questioning a number of assumptions/statements made and produced a list of concerns relating to the proposals and concluded by objecting to the amount of deforestation to open habitat and called for a higher proportion of conversion to native woodland. Another local resident offered comments containing a personal response, specific areas of concern relating to roads and impacts on bird species and offered practical ideas relating to the landscape and deer management. Also included was a book containing the reflections of local people's reactions to the changes at Gib Tor developed through the Gateway Project with Staffordshire Moorlands District Council. Finally another resident questioned the impartiality of the Environmental Statement making the observation that the Environmental Statement makes a case for open habitat on conservation grounds whereas the argument to retain woodland is based on local emotional attachment to the trees rather than sound conservation justification. However he notes that the Environmental Statement does actually justify the retention of woodland on conservation grounds supporting the retention and restructuring of the woodland and argues that a case could be made for the retention of 80% tree cover.

5.7.1.3 The preparation of an Environmental Statement and subsequent consultation has provided a process to formally recognise the views and concerns of all interested parties and stakeholders and provided an opportunity to submit evidence. The Forestry Commission and other stakeholders recognise that there is some opposition to significant change. However as a result of the preparation of an Environment Statement, the time scale for removal of trees has been extended, conifers in sensitive locations have been retained for as long as possible and the proportion of open ground has been reduced from 90% to 45% with a greater area of native woodland than was originally proposed. The Forestry Commission believes that the current proposal strikes a reasonable balance between the differing views but strongly recommends that the *proposer* continues to engage with all stakeholders on the future management of the site and keeps the local community fully informed of all operations and their impacts as progress is made.

5.7.2 Highways

The planning of timber haulage needs to allow for the requirement of local people who use the local roads on a daily basis. Liaison with local people before operations are carried out is good practice. Such liaison would also establish what period of the day hauliers should avoid, e.g. when children are taken to school, etc.

The application is approved subject to the following conditions;

Condition (f) The haulage routes and ancillary matters will be discussed with the local Highway Authority before felling commences.

Condition (g) Warning notices will be used whilst felling is in progress within the felling area.

Condition (h) The local community will be informed of the likely period of felling and timber extraction, along with provision of information boards.

5.8 Impacts on fauna and flora

5.8.1 The site lies in the South West Peak moorlands of the Peak District, which consists of open blocks of moorland separated by agricultural land forming rough grazing used for traditional stock farming. The site is surrounded by land within the *Leek Moors Site of Special Scientific Interest (SSSI)* comprising a mosaic of upland heath, blanket bog and semi-natural grassland. An outstanding assemblage of open ground birds is considered to be of great importance in the area. The *Leek Moors SSSI* is also designated as being of European Importance for breeding birds and habitats as part of the much wider *South Pennines Special Protection Area (SPA)* and *Special Area for Conservation (SAC)*.

5.8.2 Consultation responses have produced mixed views on the impacts on fauna and flora, particularly impacts on birds species for which the surrounding moorland was designated for. One local resident has opposed the felling and is not convinced that the modest increase in open habitat would lead to an increase in breeding moorland birds and made reference to the general trend/decline of key breeding species on the North Staffordshire Moorlands. Detailed observations and comments on key bird species associated with the woodland were supplied and the lack of local bird data used to support the Environmental Statement questioned. Further detailed comments were supplied by another member of the public on a number of specific bird species, their declines and habitat preferences based on personal observations over 20 years and concluded that the Environmental Statement was unhelpfully vague on the potential impacts of the proposals on certain bird species and expressed concern that some species would disappear.

5.8.3 Given these comments clarification was sought from the RSPB *National Land Management Advisor* on 20 May 2011 on the potential impact of the proposals on specific bird species. The RSPB responded to the specific points and summarised by stating *“Although the EIA has weaknesses, the overall assessment that the scheme would have significant conservation benefits is sound, provided that the scheme is properly planned and implemented, and ongoing management is appropriate. The project at Gib Tor is very likely to have a significant and positive impact on the breeding bird community and mitigation management can be implemented to conserve existing species at the same time as providing new habitat for others. However, if specialist advice and resources are lacking then the outcomes are far harder to predict”*.

5.8.4 The consultation response from Natural England (the Government’s statutory adviser on Nature Conservation) on the proposals stated that; *“The conclusions of the EIA regarding overall ecological and landscape impacts are considered beneficial with the provision of higher quality habitats in the long term”* and further adds *“In addition the assessment of impacts on key bird species considers the proposals beneficial to some e.g. lesser redpoll while for others e.g. gold crest and coal tit mitigation measures are included”*.

5.8.5 Natural England requested amendments to the final design which included; i) changing the part of compartment 4b (SSSI) to be planted as ‘closed canopy woodland’ to ‘open woodland’; ii) to include works to maximise opportunities to wet up key areas of the site where open habitat is proposed; iii) a request to review the plans for compartment 3 to maximise the potential ecological benefits and iv) a request that detailed method statements are to be prepared and agreed to show how the site will be protected from forestry operations before any work starts.

5.8.6 The Peak District National Park Authority stated *“That the overall refined design looked broadly acceptable, in particular supporting the broad pattern of restructuring to create open habitats on higher ground and native woodland on the lower slopes and steam valleys”*. However they requested that specific comments were taken into account i.e. a gradation of less dense woodland on higher ground gradually becoming denser on lower slopes for areas identified as open woodland, the creation of wetland and open water habitats and the use of local provenance trees.

5.8.7 The Forestry Commission considers that sufficient evidence has been provided to make an assessment of the impacts on fauna and flora and that the current proposals strike an appropriate balance between the interests of existing species associated with the plantation and that of the surrounding moorland.

The application is approved subject to the following conditions;

Condition (i) The part of Cpt4b (SSSI) identified to be planted as closed canopy woodland is to be planted as open woodland of mainly willow species. SWT will agree the density of tree planting with Natural England to ensure the SSSI interests of this compartment are preserved.

Condition (j) Best practice guidance for forest managers (*Forests and Birds: A guide to managing forests for rare birds, 1997*) to ensure that they meet the legal and conservation requirements for important bird species must be closely followed during felling and restoration. In particular no felling shall take place during the bird nesting season: 01 February to 31 July inclusive.

Condition (k) Any restoration works that may disturb ground nesting birds will not be undertaken on cleared areas between 01 May and 30 September unless agreed with the Forestry Commission.

Condition (l) Expert advice will be sought before considering the installation of nest boxes for owls.

Condition (m) Deer fences will be regularly monitored to identify any instances of bird collisions. If collisions become an issue vulnerable areas will be marked with hi-vis tape.

Condition (n) Method statements detailing how the ecological interest and bird fauna of the site will be protected from forestry operations will be prepared by the *proposer* to be agreed by the Forestry Commission, Natural England and RSPB before any work commences.

Condition (o) Locally scarce tree species such as Aspen and Bay Willow will be established from local provenance stock where available.

Condition (p) After five years the proposal's impacts on bird populations at the site will be assessed and appropriate specialist advice on the remaining work will be sought if concerns are raised.

5.9 Impacts on soil and water

The Environmental Statement has assessed the potential impacts of felling and habitat restoration on catchment hydrology and the soil resource and concluded that the overall assessment is neutral. The phasing of felling has been extended and there will need to be evidence of satisfactory establishment of the areas identified as new native woodland in areas felled in phase one, before consideration is given to authorising the second phase of felling. In addition consultation responses have raised concerns over the possible impacts of flooding and have asked for more detail to be provided on the potential for re-wetting the restored habitats.

The application is approved subject to the following conditions;

Condition (q) As part of the overall management of all the habitats on the site a method statement detailing the management of the drainage system to enable the creation of wetland and open water habitats coupled with mitigation to reduce the impacts of possible flooding incidents will be prepared before restoration commences. Natural England, Forestry Commission, Environment Agency and the Forest Neighbours will need to be consulted.

Condition (r) Harvesting operations will be carried out in accordance with best practice as outlined in the UK Forestry Standard, published Forestry Commission best practice guidelines and all relevant legislation will be followed.

Condition (s) Permission for the second phase of tree felling will only be granted (if project is still within the 10 year consent period) after 7 years have passed since the first felling phase or if 60% of the trees in the areas identified as new native woodland have reached an average height of 2 metres. The replanting area in phase 1 totals 9.85 ha and includes compartments C2a west, C2c, C3 and C4b part.

5.10 Impacts on air quality

National policy (UK Forestry Standard & Climate Change Programme) states that burning of brash should be avoided in order to minimise emissions of methane and nitrous oxide.

The application is approved subject to the following condition;

Condition (t) Brash will be removed from site, mulched or windrowed. **Burning of brash on site is not acceptable under any circumstances.**

5.11 Impacts on climate

5.11.1 Proposers of deforestation projects are required to consider the impacts on carbon emissions of conversion to open habitat as part of environmental impact assessment. When calculating the carbon impact of woodland removal, both the impact on the long-term carbon store of the site, and the reduced rate of production of timber and woodfuel that substitute for other energy intensive materials and fuels, should be taken into account. Similarly, practitioners should also take in to account the impact on carbon storage *and* substitution for more energy intensive materials and fuels into account when calculating the carbon impact of compensatory woodland creation

5.11.2 The FC's assessment of the Environmental Statement is that if the full contribution of forestry is considered, together with emissions of methane from water-logged soils, the proposal's carbon balance is likely to be unfavourable. However, by prioritising the wetter soils for permanent removal, loss of productivity for subsequent Green House Gases (GHG) mitigation will be minimised and the ability to restore a functional, high quality peat ecosystem will be maximised. Opportunities for carbon storage would be maximised, but the overall GHG balance might well not be positive. However, the Open Habitat's Policy only states that the negative impacts of carbon balance should be minimised and this has been adequately articulated in the project proposals through the following proposed mitigation measures:

- No residue burning
- Utilisation of harvested material for wood products and woodfuel
- Lower yielding crops to be removed
- Wind-firm crops retained to economic maturity
- Restocking of site with wet woodland
- Open habitat focussed on wetter sites
- Restoration to high quality nationally and locally rare priority habitat

The Forestry Commission is satisfied that the impacts on the carbon balance of the proposals have been adequately addressed by the Environmental Statement.

5.12 Impacts on landscape and visual environment

There will be short term impacts as the project is implemented, however the Forestry Commission considers that its primary guidance on landscape design principles has been followed and that in the long term a satisfactory balance between open and afforested land has been achieved. The proposal is consistent with the landscape character of the Peak District Landscape Strategy and the phased tree felling and retentions will help to mitigate the immediate change to the landscape (see conditions (c) and (d) and (e)).

5.13 Impacts on material assets

There are no obvious impacts on material assets such as residential neighbouring properties that have not been addressed by the proposals or conditions of approval.

5.14 Impacts on earth/cultural heritage (Archaeology)

5.14.1 There are two designated earth heritage features that fall within the application area. The first, Gib Tor Rocks (a Regionally Important Geological/Geomorphological Site and classified as an exposure site) will not be affected by the proposals. Black Brook (SSSI) is of national significance.

However, the proposed changes should not radically change the stream regime and, provided appropriate management is adopted to keep the exposures accessible and visible, the magnitude and effect is considered to be neutral.

5.14.2 The cultural heritage features that can be found on the site are the relict drystone walls, gate posts and buildings. The proposer states that opportunities would be provided to the Peak District National Park Authority or local archaeological interest groups to access the site immediately after clearance for field walking in case there are any features of interest that can be located and recorded before vegetation establishes.

The application is approved subject to the following condition;

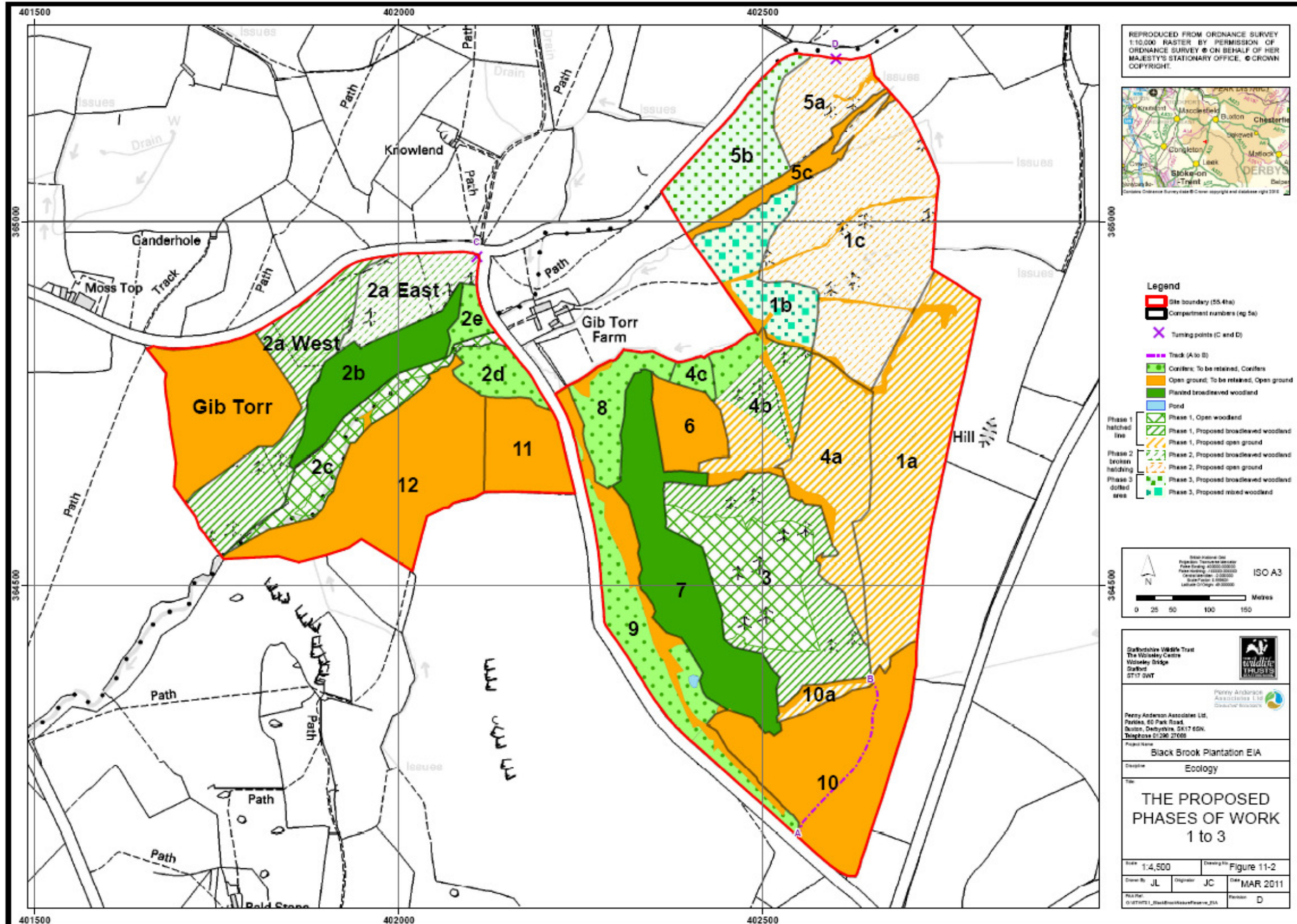
Condition (u) The following archaeological features will be identified and marked appropriately prior to any potentially damaging operations taking place and all operatives made aware of their existence and the mitigation measures required for each feature listed:

- relic drystone walls.
- gateposts.
- buildings.

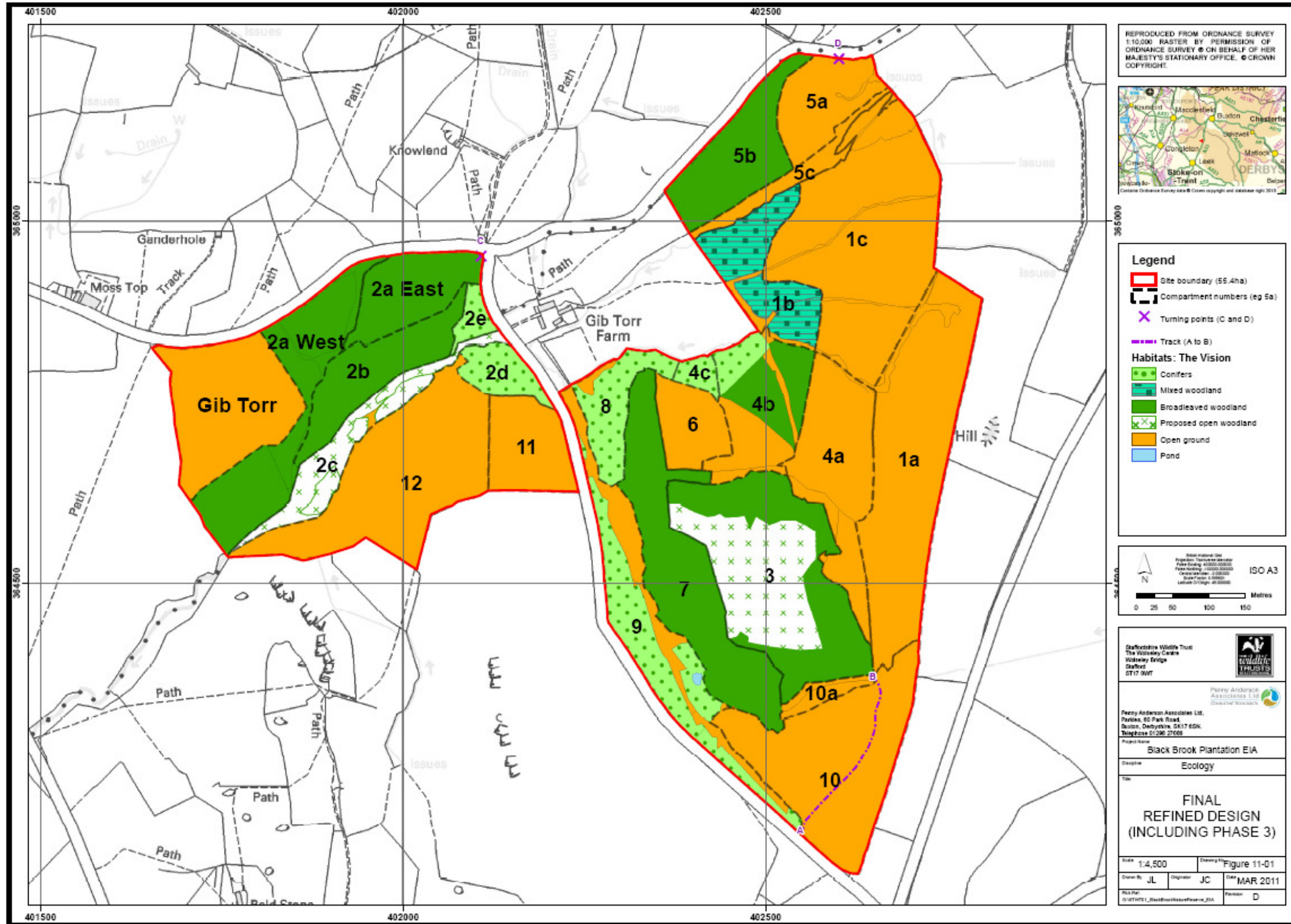
Condition (v) The *proposer* will inform and allow the Peak District National Park Authority or local archaeological interest groups to access the site immediately after clearance for field walking in case there are any features of interest that can be located and recorded before vegetation establishes. If any evidence of archaeological interest is found during operations expertise will be sought on the features' importance any mitigation to prevent damage.

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17 June 2011



Appendix 1 - Proposed Phases of Tree Felling (note: only phases 1 & 2 are consented under this project)



Appendix 2 - Final Design