

# Application for Consent under the Environmental Impact Assessment (Forestry) (England and Wales) Regulations 1999

## Threestoneburn Forestry Project EIA Issues Log

A comprehensive background to the EIA decision process at Threestoneburn the reasons for consent and the associated conditions is available in the Background and Statement of Reasons Supporting Decision to Grant Consent.

### Glossary

TSB – Threestoneburn  
 NNPA – Northumberland National Park Authority  
 NWT – Northumberland Wildlife Trust  
 NE – Natural England  
 EA – Environment Agency  
 FC – Forestry Commission  
 NCC – Northumberland County Council  
 ES – Environmental Statement  
 ARS Ltd. – Archaeological Research Surveys Limited.

### Summary of issues and responses

Issue Ref.	Name	Organisation	Consultation period	Date of Response	Category	Key Parts of ES	Objection and/or Opinion	Further information to the ES	Related Condition (s) of Consent	Justification
1			1	25-Sep-08	All	N/A	None	N/A	N/A	N/A
2			1	04-Dec-08	Access Route	12 Appendix x 18	Logical route would be to utilise the sand quarry at Roddam. Does not want to alter the corners of his fields but any other alternative routes would have a far greater impact. Not in favour of route from Ilderton Moor Farm along Cowdene.	Annex 12 Appendix VII  Further information to Annex provided in June 2010.	(c), (e), (r), (p)	<p>The ES presented information on three timber haulage routes, concluding that the route to the A697 via Reavely and Brandon Farms was preferred. This route had previously been upgraded for use by the lorries transporting quarry stone so had been subject to frequent use before and the mitigation measures were outlined as part of the proposal to minimise the impacts on local residents using and living on the route.</p> <p>In response to concerns about this route and a general preference from consultees that an alternative route via South Middleton was considered, FC requested further information to ensure the feasibility of all routes was thoroughly assessed. The applicant provided further detail on the impacts and mitigation options for the routes and took into account extension to the project's felling period from three to 12 years. This information further supported transport via Reavely and Brandon and in light of this additional information Northumberland County Council's Highways Department (NCCHD) were initially content with this approach. However, after further consideration NCCHD ultimately objected to it on the grounds of safety at the junction with the A697 and its suitability of heavy lorries.</p> <p>In response, further information was provided on the route</p>

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										<p>via South Middleton. This route requires considerable upgrade and construction of new road within the National Park. A proposal to use this route was presented to Northumberland National Park Authority (NNPA). While not NNPA's preferred route they ultimately supported it giving consent (with conditions) under the General Permitted Development Order 1995.</p> <p>Whilst the route via South Middleton will lead to some short-term landscape impacts the disturbance and risks associated with timber traffic are less compared to the routes through the Ingram Valley. The route was also supported by NCCHD and accepted by NNPA. The route passes close to known archaeological sites and consultees raised concerns about disturbing unknown sites during the construction phase (see issue 75).</p> <p>These issues are accounted for in the NCCHD's consent for the road. Natural England were also content with the proposal advising that road construction should allow re-vegetation. Having considered the range of transport and traffic issues and options the FC considers that the selected route will not have a significant environmental impact as long as the conditions of the NCC's GDPO consent are adhered to. It will be a condition of the FC's consent that the GDPO conditions are followed. These include: obedience to a watching brief to ensure protection of unknown archaeological features and the re-seeding of the road once tree felling is complete.</p> <p>FC will also apply conditions to manage the haulage with respect to the local residents along the route (see issue 82).</p>
3			1	27-Sep-08	Access route	12 Appendix x 18	Proposed haulage route (via Reaveley and Brandon) is unsuitable as it is narrow with limited passing places and has often collapsed into the river. Other routes will cause less disruption.	Annex - Appendix VII  Further info to the Annex provided June 2010.	N/A	See response to issue 2.

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4			1	27-Sep-08	Red Squirrels	8 Appendix x 7	The area warrants leaving as one of last refuges for endangered Red squirrel.	Annex 8 Appendix III Appendix V.	(l), (m), (n)	<p>The ES reported that TSB forest contains a resident population of red squirrel and included a Red Squirrel Conservation Assessment by Dr Lurz, a recognised expert on the animal. It concluded that the deforestation would ultimately result in the red squirrels emigrating from the forest along the wooded watercourse to the east to find a food source.</p> <p>The report could not identify a realistic management option ensure a viable red squirrel population could remain at TSB and considered options for intervention to help the red squirrels at TSB: allowing natural migration, capture for captive breeding and translocation. However, when aspects of animal welfare, release sites, speed of dispersal and annual seed crops none of these were considered realistic.</p> <p>Concern about this was raised as a significant issue during the consultation process by local groups, individuals, NNPA and NWT. The consultation responses highlighted the problems associated with the project's original three year timescale. FC concluded that a revised proposal with a longer felling period or alternative method of red squirrel emigration needed consideration. In response the applicant provided further mitigation proposals (Annex - Appendix III).</p> <p>Revised proposals were submitted and included notable changes: prolonging the restructuring from three to 12 years and ensuring that hazel would be re-planted early in this period to provide a food source for the resident red population within 8-9 years. By following the replanting programme the restructured forest would have an average carrying capacity of 21 red squirrels. The revised plan also recognised that as tree felling progressed the lack of mature trees would limit nesting opportunities and artificial nest boxes were therefore included in the proposal. The revisions also recognised that the long-term success of the red squirrel population would depend on the level of grey squirrel control in the surrounding area and the applicant has indicated they would undertake the work needed to control grey squirrels if granted consent. The revisions were welcomed by NNPA and while NE considered TSB a poor candidate for a red squirrel conservation area but felt the proposals include the necessary mitigating actions to maintain a local red squirrel population.</p> <p>In light of the revised proposals and the steps taken to ensure the long-term viability of the red squirrels Forestry Commission considers that the project will not have a significant impact on the red squirrel population. In</p>

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										reaching this conclusion FC has taken into consideration as major factors that the woodland is not a red squirrel stronghold and that the ES found that during any normal restructuring of the forest there would inevitably be a period with no trees of seed bearing age. Red squirrels would therefore have to emigrate from the TSB along the wooded watercourse to the east. In other words the long term viability of red squirrels at TSB is questionable without the proposals. In contrast the revised proposals for TSB make provision to assist the resident red squirrels as far as possible. It will be a condition of EIA consent that the applicant adheres to the recommendation in the Red Squirrel Survival Survey (Annex - Appendix III) and undertakes a programme of grey squirrel control.
5	Elaine Rigg	NNPA Hexham	1	30-Sep-08	Application for extension	N/A	Request for an extension to the consultation period.	N/A	N/A	The first consultation period was extended until 23rd November following a requests for more time from the National Park Authority and Natural England.
6			1	09-Oct-08	Access Route	12 Appendix x 18	Objection to the proposed extraction route via Roddam.	Annex - Appendix VII  Further info to Annex provided in June 2010.	N/A	See response to issue 2.
7			1	09-Oct-08	Access route	12 Appendix x 18	Suggest longer timescale resulting in fewer journeys.	Annex - Appendix VII  Further info to Annex provided in June 2010.	(c)	Project timescale expanded from three to 12 years which will spread the impact of timber haulage, reducing the average number of lorry movements per week from 40 to 10. See response to issue 2.
8			1	09-Oct-08	Red squirrels	8 Appendix x 7	Suggest starting at highest point to assist migration of wildlife.	Annex 8 Appendix III Appendix V	(c)	See response to issue 4.
9	Amanda Brown Clerk to Ingram Parish Council	Ingram Parish Council 1	1	09-Oct-2008 and 24-Nov-2008	Access Route	12 Appendix x 18	Road unsuitable for long term use due to width, subsidence, flood damage. Poor access and egress onto A697 at Brandon Whitehouse therefore South Middleton route should be used.	Annex 12 Appendix VII  Further info to Annex provided in June 2010.	N/A	See response to issue 2.

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10	Kim McEwen	The Black Grouse Recovery Project	1	13-Oct-08	Black Grouse	All	In favour as the proposal because it will reinstate favourable environment for Black Grouse therefore contributing to reaching BAP targets in NE England.	N/A	N/A	Support noted for the decision process. The ES reported Black Grouse to be present at TSB. This is a species in serious decline across the UK and NNP shares National Biodiversity Action Plan objectives to stabilise population numbers. The proposal's potential positive impact on the bird - restoring heath, creating a mosaic of open ground and woodland with sheltered open spaces in the woodland edges - is recognised in helping this bird and meeting national BAP targets.
11	Richard Laughton Planning Officer	Environment Agency	1	21-Oct-08	Hydrology and flooding risk	5 Appendix x 21	Flood risk to TSB not ascertained so flood risk assessment must be carried out.	Annex 5.2.5 Appendix VIII.	N/A	<p>The initial ES included an independent report (Appendix 21) which considered the proposal's affect on flood risk and water quality. While no standard method exists for assessing eh affect of deforestation on flood risk and that experimental catchments were significantly different to TSB the report concluded: annual flood peaks were unlikely to change much due to deforestation. Summer peaks and rates of rise would increase significantly after deforestation BUT with the exception of rare extreme events would remain below annual maximum peak rates in winter. It identified three possible flood risk sites but did not identify any significant risks, though suggested a further assessment of the channel near TSB House may be useful.</p> <p>To address concerns about the flood risk that remained and were raised during the first consultation, FC undertook a flood risk assessment to assess the impact of tree felling on the peak flows. This was a desk based exercise which drew on expert advice on hydrology from Dr Tom Nesbit (Forest Research) and data and maps used for the calculations and catchment areas were provided by the applicant. The assessment concluded that the longer time scale for felling (three to 12 years), riparian buffer zones and riparian planting, adherence to the Forest and Water Guidelines and restoration of the raised bog using piling dams would negate any flood risk.</p> <p>FC used the results of this exercise to inform discussions the EA who accepted that there was no significant risk due to the tree felling. This assessment and its results was submitted in the ES Annex (Appendix VIII) and under went consultation in June/July 2009. The findings from the initial hydrological report and further flood assessment reassured the FC that the proposals, especially in light of the extended felling period, would not have any significant impact on the environment. FC's EIA consent will include a general condition to ensure compliance with best practice.</p>

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12	Richard Laughton Planning Officer	Environment Agency Tyneside House	1	21-Oct-08	Hydrology and flooding risk	5 Appendix x 21	No objections to proposed water sampling but recommend a comparison chemical sampling site should be established outside the catchments. Sampling frequency should be maintained at monthly intervals and reduced to bimonthly for the final two years and additional rainfall gauging undertaken.	Annex 5.2.5 Appendix VIII.	(d), (f)	<p>The ES's report on hydrology noted the water quality from the TSB catchment and the importance of the river Till SAC. It also notes that chemical pollution and sedimentation are most likely during the tree felling and planting phases and this should be monitored through out all phases of the project.</p> <p>A condition of consent will be that the applicant undertakes regular water sampling at the locations shown in figure 2.1 of Appendix 21 and at additional locations (to be agreed with EA) out with the TSB catchment to provide a comparison for the catchment). The amount of phosphate will be measured in micrograms with the frequency of sampling monthly prior to (to provide a base line figures for the catchment) and during the felling phases. Results of the sample analysis will be supplied to EA at predetermined frequency with notification of these results also provided to FC. If determinand levels do not meet the EA guidelines the applicant must cease felling and undertake actions to rectify water quality to satisfy these guidelines.</p> <p>The ES states that the applicant will comply with the Forest and Water Guidelines, as should be expected of all forestry projects. Amongst other guidelines, this requires:</p> <ul style="list-style-type: none"> <li>• Regular inspection of local watercourses regularly for evidence of discoloration or sediment deposition, particularly at drainage outlets from harvesting sites.</li> <li>• Tracing any pollution sources and immediately applying remedial action by modifying operating procedures and constructing silt traps if necessary. If there is any erosion risk associated with the operation of machinery on temporary tracks, protect the ground surface with brash or stone aggregate.</li> </ul> <p>In light of these monitoring controls FC consider that the impact on the water quality and the River Till SAC will not be significantly impacted.</p>
13	Martin Kerby Conservation officer North east	RSPB,	1	31-Oct-08	Habitat Management	6 Appendix x 11	Needs to be developed in more detail including mapping that shows on which part of the site the proposed BAP habitats will be restored.	Annex - Appendix V.	N/A	Appendix V of the ES Annex. Provides a vegetation survey map showing the extent of the blanket bog (296 ha) and other habitats to be restored. These areas are also set out of this document which was consulted on in June-July 2009.

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14	Martin Kerby Conservation officer North east	RSPB	1	31-Oct-08	Compensatory planting	4 Appendix x 11 Appendix x 17 Maps 9, 10 and 12	Larger area of New Native Woodland required. Scrubby habitat, lower stocking and markers on fences.	Annex 6.4.4 Appendix V	(k)	<p>The Annex to the ES details 51.56 hectares (ha) of native woodland replanting at four sites: Kirknewton Tors (39 ha), Langleeford Valley (4.02 ha), Earle Hill Head (6.90 ha) and Brownslaw (1.64 ha) and outlines the National Vegetation Classification native woodland types the planting mixtures aim to achieve. Combined with the native woodland creation along the watersides at TSB (107 ha) a total of 158.56 ha native woodland planting will take place.</p> <p>FC consider this an acceptable amount considering that, without these proposals only 23.63 ha of native broadleaf planting would be undertaken at TSB as part of the 'normal' restructuring of the woodland under the original forest design plan. It shall be a condition of FC's EIA consent that where deer fences are used to protect new planting they will be marked to prevent bird strike.</p>
15	Martin Kerby Conservation officer North east	RSPB	1	31-Oct-08	Habitat Management	6 Appendix x 11	Grazing and burning regimes to be identified.	Annex 6.4.4 Appendix V MOU for Consultation Panel.	(h), (i)	<p>The ES Annex explains that burning and grazing regimes will be agreed after tree felling. While the ES does not therefore detail the method the applicant makes a statement of intent to use a consultation panel to take advice on the methods of restoration and monitoring. We consider this commitment will fulfil the role of a steering group and ensure effective management at the site. It is also a condition of our consent that the applicant will consult interested parties and keep them informed of progress annually. See issue 22 for response on re-wetting of bog land.</p>
16	Martin Kerby Conservation officer North east	RSPB	1	31-Oct-08	Habitat Management	6 Appendix x 11	Monitor habitat change through steering group required.	MOU for Consultation Panel.	(i)	See response to issue 15.
17	Martin Kerby Conservation officer North east	RSPB	1	31-Oct-08	Impact on breeding birds	7 Table 4 Appendix x 4	Part of Cheviot SSSI citation. Clarify that there is no effect on birds' adjacent land.	N/A	N/A	<p>This issue was considered in the Environmental Statement. Whilst there may be a short term localised risk of disturbance during the felling phase to birds utilising the adjacent moorland in the long term the ES found that there would be significant benefits, through open ground habitat creation, for moorland bird species.</p>

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18	Martin Kerby Conservation officer North east	RSPB	1	31-Oct-08	Impact on breeding birds	7 Table 4 Appendix x 4	Schedule 1 birds adversely affected: Goshawk mitigation appropriate. Common crossbill undertake annual nest searches at appropriate times of year.	N/A	(j), (d)	<p>The ES recognises the presence of these Schedule 1 birds and records the proposals impact concluding:</p> <p>* Goshawk will be able to relocate to suitable territory 10 km away, during operations the woodland will be monitored for the presence and no works will take place during within a buffer zone around nesting sites during the nesting season with work only taking place outside the nesting season within a buffer zone around nesting sites during the nesting season with work only taking place outside the nesting season.</p> <p>* Crossbill is a mobile species which seeks out trees with plentiful cones to nest in each year. This mobile bird could use other nearby plantations. During work, surveys will be undertaken to locate sites, and where found, a buffer zone will be set-up to prevent work during the breeding season.</p> <p>In light of these species' ability to relocate, the proposed measures to protect them if found on site and the benefits to other important birds such as black grouse and upland waders, we consider the proposals will not have a significant affect on these species. A general condition of consent will draw attention to the need to follow all relevant legislation, which includes the Wildlife and Countryside Act which specially protects goshawk and crossbill.</p>
19	Martin Kerby Conservation officer North east	RSPB	1	31-Oct-08	Compensatory planting	4, 5, 13 Appendix x 11 Appendix x 17 Maps 9, 10 and 12	Planting elsewhere for shortfall acceptable but must ensure no adverse effect on biodiversity of chosen locations.	Annex – Appendix V	N/A	Proposals for new native woodland planting were set-out in the ES Annex which was consulted on in June - July 2009. No adverse impacts were identified in sites' biodiversity (see issue 45 for comment on landscaping and location). FC do not believe the planting at these locations will have a detrimental affect on the bio-diversity there.
20	Martin Kerby Conservation officer North east	RSPB	1	31-Oct-08	Red Squirrels	8 Appx 7	Mitigation proposals and alternatives should be explored in more detail.	Annex 8 Appendix III Appendix V.	(l), (m), (n)	See response to issue 4.
21	Steve Lowe Head of Conservation	Northumberland Wildlife Trust,	1	07-Nov-08	Red Squirrels	8 Appx 7	Generally welcome such proposals on landscape and habitat restoration but outweighed if Red squirrels suffer therefore lodge opposition to the	Annex 8 Appendix III Appendix V.	(c)	See response to issue 4.

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							proposal. Would look to see longer timescale restructuring (at least 10 years) or Continuous cover or alternatives put forward.			
22	Steve Lowe Head of Conservation	Northumberland Wildlife Trust,	1	07-Nov-08	Habitat Management	5, 6	Not sufficient information on implementation methodologies, particularly hydrology.	Annex 5.2.5 Appendix VIII	(h), (i)	See response to issue 15. The applicant provided further information on the monitoring of the blanket bog restoration in the ES Annex - Appendix V. This document also set out the method that will be used to rewet the peat land- using plastic pilling dams at strategic locations (identified with the help of initial monitoring after tree felling) to re-wet the land. This technique has been successful at Kielder Mire. In light of this FC feel the applicant has adequately addressed this point and see no reason why the re-wetting should not be successful.
23	Steve Lowe Head of Conservation	Northumberland Wildlife Trust,	1	07-Nov-08	Biodiversity	6, 7	Information insufficient and anecdotal: 23a) Badger. 23b) Mitigation for birds in short and medium term. 23c) Effects of displacement and carrying capacity especially birds of prey.	Annex 6.3.2 Appendix II	(d), (j)	<p>23a) ES Annex Appendix II provides the results of a badger survey at TSB. This reiterated the results of the initial survey undertaken as part of the ES with no active signs of badgers found at TSB. In the immediate area the survey found four disused setts within 1 km of the forest boundary and notes that cavities near Kitty Craggs may have provided setts for badgers in the past but there were no signs of occupation. In light of this and the provisions included in the ES Annex: to follow guidelines, undertake survey work before a carrying out operations, and remain vigilant during work, FC consider there is adequate controls mitigation to ensure the proposals will not have a significant affect on badgers. A general condition of our consent will draw the applicant's attention to the need to follow all relevant best practice and legislation which includes the Protection of Badgers Acts.</p> <p>23b) Mitigation for birds - see response to issue 18.</p> <p>23c) Section 7 of the ES considers the impacts on the bird life at TSB Forest. Several birds of prey and considered in this assessment. Goshawks are considered under issue 18. The ES notes that the site is a hunting location for hen harrier, peregrine, short-eared owl, and merlin but that this may be part of their wider range of hunting grounds. Hen harrier, peregrine and merlin are EC Annex 1 birds but the low numbers of these birds seen on site and absence of nesting sites indicates TSB is not important for these species.</p> <p>Both buzzards and sparrowhawks have nesting territories at TSB but these species are considered able to relocate to</p>

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										<p>alternative conifer plantations in the nearby area, within 10km. Nests will be identified and protected during operations and no work will take place within 500 metres during the nesting season. The applicant is committed to surveying the site for long-eared owl before any work takes place to confirm their presence. If present no work will take place within 500 metres of any nesting sites during the nesting season. This survey and the application of 500 metre buffers is a condition of our consent.</p> <p>FC consider this mitigation sufficient to ensure the proposals will not have a significant impact on birds of prey and will make surveying and use of established buffer zones a condition of EIA consent.</p>
24	Steve Lowe Head of Conservation	Northumberland Wildlife Trust,	1	07-Nov-08	Soil Stability	5 Appendix x 21	Additional information required at micro level in some cases to ensure adequately addressed.	N/A	(h)	The applicant has undertaken to carry out the work in accordance with forest industry good practice guidelines as set out in the UK Forestry Standard and the Forest and Water Guidelines. In addition an individual site risk assessment will need to be carried out and approved by the Forestry Commission before any mulching or de-stumping operations can take place.
25	Steve Lowe Head of Conservation	Northumberland Wildlife Trust,	1	07-Nov-08	Hydrology and flooding risk	5 Appendix x 21	Not fully satisfied that the proposal has sufficient elements to address increased siltation run off and impacts on spawning grounds amongst other features of river Till SAC.	Annex 5.2.5 Appendix VIII	(d), (f)	See response to issue 12.
26	Steve Lowe Head of Conservation	Northumberland Wildlife Trust,	1	07-Nov-08	Carbon balance	14 Appendix x 10  Appendix x 23	Inadequate compensatory planting to offset loss of carbon.	Annex 6.4.4 Appendix V	(c), (t), (u), (v)	<p>The proposal's impact on the site's carbon balance was identified as an issue during the initial scoping for the ES. Consequently the ES provides an assessment of the carbon storage that will be lost by converting most of TSB forest to open habitats. The carbon storage at TSB was assessed by the Edinburgh Centre for Carbon Management (ECCM). Their assessment concluded the current forest stored 150,000 tonnes of carbon dioxide and conversion to open habitats would therefore reduce carbon storage at the site by this amount.</p> <p>The ES identified practices to reduce the loss of carbon stored in the soil: retaining root plates, controlled use of machinery to avoid soil disturbance, removing brash and mulching to encourage the rapid vegetation of the site and blocking drains to re-wet peat to prevent generation of carbon dioxide. These practices are identified as part of the proposals to restore open habitats at TSB and a condition of our consent is that de-stumping and mulching will only be carried out after a risk assessment has been prepared</p>

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										<p>which shows the risk of soil disturbance and this is accepted by the FC. The method of working will be subject to a risk assessment to be agreed by the FC. Advise in the Forest Research publication: "Guidance on site selection for brush removal" will help to inform the risk assessment and FC's assessment. The applicant also states their commitment to follow the Forests and Soil Conservation Guidelines in the ES.</p> <p>While the ES argued that whilst there would be a reduction in long term carbon storage this was inevitable in order to restore the open ground habitats and their environmental benefits, an assessment of the carbon storage delivered by compensatory planting was made. The onsite planting was predicted to store 10,000 tonnes of carbon dioxide. A site of 74ha broadleaved and 193ha conifer was used to assess the scale of compensatory planting that would be required to provide compensatory carbon storage offsite. This site, on the west coast of Scotland would store 90,000 tonnes of carbon dioxide. The applicant made a commitment to locate an equivalent area to this for planting to provide compensatory tree planting.</p> <p>Consultees remained concerned about the loss of carbon storage and the location of the compensatory planting. The applicant submitted further information on compensatory planting (ES Annex - Appendix V) which outlined an increased area of broadleaved replanting: 158.5 hectares at TSB and on nearby land within NNP. The applicant also made a commitment to identify and plant an additional 170 hectares of compensatory planting that would include a significant proportion of productive conifers for carbon sequestration. The total replanting area proposed was 328.5 hectares, compared to the existing forest area at TSB of 568 hectares.</p> <p>It is common practice to either reduce the area in the second rotation or avoid planting deep peat completely (because blanket bog is a priority habitat listed on Annex 1 to the EC Habitats Directive). As such it would be inappropriate to require compensatory planting or carbon storage mitigation for the 232 ha of deep peat at TSB that would not normally have been replanted. In light of common practice approach to leave deep peat unplanted, FC consider the proposed replanting area equates closely, in area terms, to the area that would normally have been restocked had a second rotation been planned for TSB forest. On the same basis, the compensatory planting is also considered to provide adequate mitigation for the loss of carbon storage at TSB.</p>

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										In light of the evidence included in the ES and the conditions to ensure both compensatory planting is undertaken within 10 years of the project starting and the risk to soils at TSB are assessed prior to potentially damaging work will minimise the loss of carbon storage and the proposal's overall affect on carbon storage will not be significant. FC consider the potential loss of long term carbon storage arising from the proposed deforestation will be negligible when compared to other likely scenarios for the future management of TSB forest. The condition on compensatory planting will require compensatory planting within an appropriate distance of TSB and in a minimum number of blocks to maximise the new woodland's bio-diversity benefit.
27	Steve Lowe Head of Conservation	Northumberland Wildlife Trust,	1	07-Nov-08	Access route	12 Appendi x 18	Extremely concerned to note there are no plans to decommission roads including existing ones. Roads are considered a threat to moorland birds under the BAP and they will increase access to site and can result in moorland birds being disturbed - See issue 57.	Annex Appendix IV Appendix VII  Further information to Annex provided in June 2010.	(o), (p), (q)	The applicant provided information in regard to this (section 3.1.d of Appendix IV to the ES Annex) which detailed the steps the applicant will take to decommission the tracks and roads and minimise their use: restricting use to estate vehicles with gates, and allowing the track ways to re-vegetate (encouraging this with hydro-seeding). Preparation of detailed assessment for decommissioning the high level track ways will be a condition of consent, as will be the removal of access ramps constructed during the felling period.  Limiting access to the track to South Middleton in the long-term and allowing it to 'green' over are conditions of NNPA's consent for the track way and adherence to these condition will be a condition of EIA consent (see issue 2).  As a result of the commitment and requirement to decommission these routes this element of the proposals was not considered to have a significant impact on the environment.
28	Steve Lowe Head of Conservation	Northumberland Wildlife Trust,	1	07-Nov-08	Habitat Management	6 Appendi x 11  Appendi x 14	Should examine Bordermires project to determine level of intervention required.		(h), (i)	See response to issue 22.
29	Steve Lowe Head of Conservation	Northumberland Wildlife Trust,	1	07-Nov-08	Monitoring	6 Appendi x 11  Appendi x 14	Commitment to comprehensive monitoring scheme beyond early establishment phase required.	Appendix V MOU for Consultation Panel.	(h), (i)	See response to issues 15 and 22. With regards to tree planting and ensuring habitat remains for red squirrels: a condition of consent will require successful tree establishment before the next phase of felling will be permitted.

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30	Mike Sutcliffe Conservation Advisor	Natural England,	1	20-Nov-08	Biodiversity	6	Broadly in favour do not consider it will have significant negative impact on notified features of adjacent Cheviot SSSI	N/A	N/A	Noted to decision process.
31	Mike Sutcliffe Conservation Advisor	Natural England,	1	20-Nov-08	Red Squirrels	8, 4	<p>Predicted loss of Red squirrels unfortunate and not convinced that mitigation is effective. Proposed an evacuation route is created by establishing new planting to connect with existing woodland in the east although contact with greys will lead to death. More consideration required to find robust solution.</p> <p>Proposal to plant NNW welcomed and considers more could be done. Specifically continue planting watercourses to an altitude of 420 metres to restore naturalistic landscape. Juniper to be included of local seed source. Reduce density of any proposed planting.</p> <p>Strongly advised that after extraction quarries are left raw but safe to colonise naturally</p>	Annex 6.6.4 Appendix III and Appendix V.	(c), (l), (m), (n)	See response to issue 4. Consent will require replanting with planting stock of local provenance where available.

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32	Mike Sutcliffe Conservation Advisor	Natural England,	1	20-Nov-08	Landscape	10 Appendix 9	Landscape assessment section welcomed, but disappointed that does not appear to meet recognised standards.	Annex 10 Appendix IV	N/A	<p>FC recognised concerns about the extent of the landscape assessment provided in the Environmental Statement (ES) and requested further information from the applicant. This was provided in the ES Annex. The assessment was and was undertaken by the Forest Design Services.</p> <p>This assessment largely agreed with that in the ES – that the plantation is a notable but not an especially prominent feature in the landscape and that, overall, the removal of the plantation would remove an unnatural landscape feature from a relatively isolated location.</p> <p>The report analysed the possible impacts of the deforestation over a short-time period. The report notes that the removal of 40-50% of woody debris from the site, letting roads green over after operations cease will reduce the visual impacts. The phasing of the felling was not considered to be a significant issue because of the deforestation's relatively short 12 year time-scale. FC are content the sequence of tree felling phases will not be significant and adherence to the specific sequence will be a condition of consent.</p> <p>The replanting was not considered to have a significant landscape impact because its design followed natural features (watercourses) ensuring the replanting blends into the landscape.</p> <p>The landscape assessment also considered the landscape impacts of the tree planting at Kirknewton Tors and concluded that while the planting would involve land use change from grazing to woodland, it would link existing woodland and have a relatively 'open' appearance (ensuring archaeological features were not planted) and would not have a significant impact in the large-scale landscape. Computer generated images of the TSB and Kirknewton Tors were made available for comments during the second consultation. Plan showing the planting at Langleeford Valley, Earle Hill Head and Brownslaw where also presented at the same time in the revised Habitat Management Plan. FC is content this assessment addresses the project's affect on landscape and that the impacts while large scale, will not be significant.</p>

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33	Mike Sutcliffe Conservation Advisor	Natural England,	1	20-Nov-08	Landscape	4, 10 Appendix x 9 Appendix x 21	Refers to JCA 4 and NNPA. Considers conifer woodland of the scale and location of that of TSB Forest is inappropriate to the local landscape character and therefore in principal removal will contribute to conservation and enhancement of the landscape character of the area.	Annex 10 Appendix IV	N/A	Noted to decision process.
34	Mike Sutcliffe Conservation Advisor	Natural England,	1	20-Nov-08	Carbon balance	13 Appendix x 10	The carbon mitigation calculations do not appear to include the fuel used in harvesting and transportation operations.	N/A	N/A	The impact of machinery and transportation were not considered of high importance in the assessment of environmental impacts because the standard approach for the management of the forest would still involve large scale harvesting and timber transportation.
35			1	24-Nov-08	Hydrology and flooding risk	5 Appendix x 21	In principal support felling and restocking. The report does not fully address the effects that the felling would have on the hydrology of the burn. Period between felling and heather restoration would leave bare soil for a number of years. Personal view is that felling should be carried out over a number of years. Would be prudent to commission independent consultant to inspect burn regularly. Insurers of house have been informed and will inform of their concern in due course.	Annex 5.2.5 Appendix VIII	(f)	Concerns for water quality and flooding were recognised and the FC and the applicant and these have been addressed in the Flood Risk Assessment and Hydrological report. Conditions of concern will require the monitoring of water quality. See response to issues 11 and 12. The proposal was adjusted after the initial submission to expand the tree felling period from three to 12 years, a condition of consent for the proposals will be that the phased approach to felling is adhered to.
36			1	24-Nov-08	Hydrology and flooding	5	Concern two-fold. Firstly to ensure	Annex 5.2.5 Appendix VIII	(g)	The ES Annex confirmed that there are no private water supplies within the forest and that a 100 metre buffer will

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					risk	Appendix x 21	unpolluted water supply and secondly propose a course of action if water quality affected. A) Water to be tested on regular basis while work being carried out. B) Trees close to spring should be felled by hand. C) Risk assessments and method statements which detail risk of water supply pollution in place. D) Prudent to consider and agree course of action if there is a problem.			be will be employed around any water supplies. Within this buffer machinery will be restricted and no mulching will take place. This will be a condition of FC consent.  FC is content this approach will safeguard the private water supplies and the proposal will therefore not have a significant effect. Refer to issue 11 and 12 for response on monitoring water quality.
37			1	24-Nov-08	Access Route	12 Appendix x 18	Access from Calder via road with contribution made to cattle grids and resurfacing. A) Need to ensure investment protected. B) Need to ensure access available at all times including for emergency vehicles. Emergency contact numbers needed. The access requires returning to same quality and type of road as present.	Annex 12 Appendix VII  Further information to Annex provided in June 2010.	N/A	The route via Calder will not be used - see response to issue 2.
38			1	24-Nov-08	Programme and details of work	4	A) Working methods will impact on enjoyment of TSB house therefore consultation of working requested, especially within 1,000 metres of house. B) Confirm timescale for works and hours	N/A	(e)	<b>A), B) and C)</b> A condition of FC's consent for the proposals is that the applicant will consider the impact of their working practices on the local residents by agreeing them with FC before work begins. The phases of tree are also specified as a condition of our consent.  <b>D)</b> See response to issues 15 and 26.

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							of work. C) Confirm machinery to be used and how managed. D) Request methods and programme of heather restoration.			
39			1	24-Nov-08	Habitat Management	4, 6	Concern on management of sheep and infrastructure required being close to house. Restocking proposals indicate 63% Sitka spruce and 11% mixed conifer. Also to be consulted on replanting design near house.	Annex V	N/A	The final replanting design for TSB has no Sitka spruce, only an element of Scots pine for red squirrels. The remainder will be native broadleaved species.
40			1	24-Nov-08	Access Route	12 Appendix 18	Objection to timber extraction route. Preferred route would be to make a short section of road to South Middleton and to the A697 from there. Safest, quickest, least disruptive route.	Annex 12 Appendix VII  Further information to Annex provided in June 2010.	N/A	See response to issue 2.
41			1	26-Nov-08	Access route	12 Appendix 18	Opposed to timber wagons using Breamish valley as it passes 17 properties and goes through 6 farms. This route follows 4 miles of the 68 cycle way and 4 miles of school bus route. It is popular with tourists and day trippers promoted by the National Park Authority. The junction with A 697 is an accident black spot. Prefer alternative north route to come out at South Middleton.	Annex 12 Appendix VII  Further information to Annex provided in June 2010.	N/A	See response to issue 2.

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42			1	27-Nov-08	Access route	12 Appendix 18	Concerned about access route through farm causing inconvenience at Lambing time and moving stock. Silage and hay time when more tractors on the road. Potential of lorries getting stuck in winter and also cutting up verges and making roads dirty	Annex 12 Appendix VII  Further information to Annex provided in June 2010.	N/A	See response to issue 2.
43			1	28-Nov-08	Access route	12 Appendix 18	Concerned about access route through Bremish as Quarry lorries caused dirt, noise and danger as there are no footpaths	Annex 12 Appendix VII  Further information to Annex provided in June 2010.	N/A	See response to issue 2.
44			1	29-Nov-08	Access Route	12 Appendix 18	Number of objections including possible risk to cyclists on Pennine Way. Preferred alternative route is northern route through South Middleton.	Annex 12 Appendix VII  Further information to Annex provided in June 2010.	N/A	See response to issue 2.
45	Elaine Rigg	NNPA,	1	01-Dec-08	Compensatory Planting	13 Appendix 10	Maximum amount possible of replanting, NNPA would like to be involved with FC and applicant in location and design. Proposed replanting at Earlehill Head and Kirknewton Tors not suitable due to shape and location.	Annex 6.4.4 Appendix V	N/A	The ES Annex included a landscape assessment which models the impacts of the proposed planting at Kirknewton Tors (see response to issue 14 and 56). The Revised Outline Habitat Plan (Annex Appendix V) described the native woodland creation at other locations and included maps showing the planting. The landscape assessment and plans were consulted on June - July 2009 with not objections raised. The planting would proceed as a condition of the tree felling at TSB. Overall, when compared against the amount of replanting that would take place under the 'normal' restructuring of TSB forest (see response to Issue 26), FC consider planting at these areas to be appropriate and to provide mitigation, along with the conifer planting and riparian planting at TSB for the deforestation.
46	Elaine Rigg	NNPA	1	01-Dec-08	Red Squirrels	8 Appendix 7	Additional mitigation to be discussed and agreed with local red squirrel experts. Suggest Scots pine included in replanting.	Annex 8 Appendix III Appendix V.	(I)	Scots pine will be included as an element of the planting mixture at TSB. It will be planted in small groups to provide seed for red squirrel.

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47	Elaine Rigg	NNPA	1	01-Dec-08	Access route	12 Appendix x 18	Suggest a local liaison group is established to work closely with FC, NNPA and NCC to decided safest route.	Annex 12 Appendix VII  Further information to Annex provided in June 2010.	N/A	Route via South Middleton will be used. See response to issue 2.
48	Elaine Rigg	NNPA	1	01-Dec-08	Public Forum	N/A	FC should consider views or residents, including concerns of flooding and water supplies.	Annex 5.2.5 Appendix VIII.	(g)	The ES has passed through three separate consultation periods to ensure the public can comment on the proposals. See response to issues 11 and 36 for specific reference to hydrology and water supplies.
49			1	02-Dec-08	Red Squirrels	8 Appendix x 7	Object to habitat abuse and loss of red squirrel.	Annex 8 Appendix III Appendix V	(c), (l), (m), (n)	Objection noted to decision process. See response to issue 4.
50			1	03-Dec-08	All	4	Object to entire application and loss of woodland.		N/A	Objection noted to decision process. See response to issue 14 which summarises the proposals mitigation for the loss of woodland.
51			1	10-Dec-08	Red Squirrels	4, 8	Against application as a whole, worried for red squirrel environment.	Annex 8 Appendix III Appendix V	(c), (l), (m), (n)	Objection noted to decision process. See response to issue 4.
52	Athole McKillop	ConFor	1	10-Dec-08	Compensatory Planting	4, 13 Appendix x 10	Should be no net loss of productive woodland in NE. Demand for wood fuel, climate change issues, etc. Many pressures on conifer plantations, Plantations on Ancient Woodland Sites, Open Ground, Restocking grants encouraging broadleaved replanting, habitat restoration.	Annex 6.4.4 Appendix V	(c), (t)	See response to issue 26 which also provides mitigation for the loss of conifer woodland. Also see 14 for information on other compensatory planting.

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53	Amanda Brown Clerk to Ingram Parish Council		2	29-Jul-09	Access route	12 Appendix x 18	1 Route suggested from Roddam to Ingram cause conflict with local traffic, section between Reaveley Greens to Calder Junction has a particularly narrow section where two vehicles will have problems passing. Indicated possible follows school bus route. Council has indicated horse traffic using road at the narrows will have "no where to escape" when it meets timber lorries.	Annex 12, Appendix VII  Further info to Annex provided in June 2010.	N/A	See response to issue 2.
54	Amanda Brown Clerk to Ingram Parish Council		2		Access route	12 Appendix x 18	Movement of livestock across roads for every day farming operations conflict with lorries	Annex 12, Appendix VII  Further info to Annex provided in June 2010.	N/A	See response to issue 2.
55	Amanda Brown Clerk to Ingram Parish Council		2		Access route	12 Appendix x 18	Increase in volume of traffic will be hazard to local and visitor traffic	Annex 12, Appendix VII  Further info to Annex provided in June 2010.	(c), (e)	See response to issue 2. The change to the proposals to span the work over 12 rather than three years will reduce the average number of lorries from 40 to 10 per week.

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56	Elaine Rigg	Northumberland National Park Authority	2	31-Jul-09	Compensatory Planting	4, 13 Appendix x 10 Maps 9-12	The NNPA view is that as much possible of the replacement planting should be native woodland and planted within the National Park. As part of work with Lilburn Estates on their Higher level Stewardship agreements that NNPA identify potential areas of native woodland planting within the National Park.	Annex 6.4.4 Appendix V	(c)	See response to issues 14 and 26. 158.5 hectares of native woodland planting will take place within the National Park.
57	Elaine Rigg	Northumberland National Park Authority	2	31-Jul-09	Red squirrels	8 Appendix x 7	Proposals in annex significantly improvement to allow likelihood of Red Squirrel survival in area. Particularly the use of early seeding species, e.g., hazelnuts and the proposed control of grey squirrels in surrounding area. NNPA would wish to see Scots Pine included in mitigation for red squirrels.	Annex 8 Appendix III Appendix V	(l), (m)	See response to issue 4.

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58	Elaine Rigg	Northumberland National Park Authority,	2	31-Jul-09	Compensatory planting	4, 13 Appendix x 10 Maps 9-12	Proposed planting changes to Kirknewton Torrs to protect goats, planting in Harthope valley and Brownslaw is satisfactory, but planting at Earlehill requires amendment. 'stepping stones' located and designed to ensure they don't detract from the surrounding landscape.  Replacement planting around Cunyan Craggs need to use open space to create natural shape and not impact on PROW.	Annex 6.4.4 Appendix V		See responses to issues 14, 26 and 53.
59	Elaine Rigg	Northumberland National Park Authority,	2	31-Jul-09	Access Route	12 Appendix x 18	Essential measures described in para 12.4 are implemented. Permission should be conditional of measures being implemented. Not support use of bypass as site now restored and habitat for Sand Martins	Annex 12 Appendix VII  Further info to Annex provided in June 2010.	(o), (p)	Route via South Middleton to be used. See response to issue 2.
60	Elaine Rigg	Northumberland National Park Authority,	2	31-Jul-09	Landscape	10 Appendix x 9	Order of felling over 10 - 12 year period the impact on the landscape while felling is progressing welcome discussion if approved.	Annex Appendix IV.	(c)	Clarification of changes to the proposal has changed the sequence of felling to minimise the impact on the landscape. Changed sequence has allowed area around Cunyan Craggs to be removed earlier and remove a possible impact on the landscape. This will also allow the replanting to take place earlier than intended. A condition of EIA consent will require tree felling in the agreed sequence of phases.

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61	Elaine Rigg	Northumberland National Park Authority,	2	31-Jul-09	Habitat Management	6	Welcome invite to join panel with Scottish woodland to advise on re establishment of native woodlands and habitats.	MOU for Consultation Panel.	(i)	Interest in Consultation Panel (see issue 15) noted.
62	Mike Sutcliffe	Natural England,	2	31-Jul-09	Habitat Management	6	Welcome extension of broadleaved planting to high altitudes and use of Juniper in planting mix plus preservation of quarry.	Annex 6.4.4 Appendix V	N/A	Noted to decision process.
63	Mike Sutcliffe	Natural England,	2	31-Jul-09	Red Squirrels	8 Appendix x 7	Notes robust nature Red squirrel preservation and commitment to grey squirrel control.	Annex 8 Appendix III Appendix V	(n)	Noted - see response to issue 4.
64	Jane Karthaus ConFor		2	10-Aug-09	Carbon balance	14 Appendix x 10 Appendix x 23	Pressing for a no net loss of productive woodland, threat to timber resource in future. And associated business. Not considered in past ES suggest should be included in future EIA.	Annex 6.4.4	(t)	See response to issue 26 which also provides mitigation for the loss of conifer woodland. Also see response to issue 14 for information on other compensatory planting.
65	Dr Emma Cox	Northumberland Wildlife Trust.	2	10-Aug-09	Habitat Management	6	Welcomes monitoring programme WWT would encourage monitoring of bird populations several schedule 1 species identified. Trust stated" no longer has grounds to object to the proposal". The NWT has concerns about: <b>A) Soil Stability</b> - keen to ensure stump removal does not increase soil instability, where stumps are removed should be dependant	Annex 6.4.4 Appendix II Appendix V Guidelines on brash removal MOU for Consultation Panel.	(c), (d), (f), (h), (o), (p), (q), (t)	<b>A) Soil stability</b> – The method of working will be subject to a risk assessment to be agreed by the FC. Advice in the Forest Research publication "Guidance on site selection for brash removal" will inform the risk assessment. See response to 26 re soil disturbance and carbon.  Invite to NWT to join consultation panel included in ES Annex MOU - see response to issue 15. It is also a condition of our consent that the applicant will consult interested parties and keep them informed of progress annually.  <b>B) Siltation and Run Off</b> - The combination of the use of the guidance on brash removal and forest and water guidelines being adopted as forestry best practise, will ensure siltation and run off are not issues. See response to issue 12.  <b>C) Roads</b> - See response to issue 27. Quarries will be re-

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							<p>on local characteristics. Require additional information is required to ensure that stability is addressed.</p> <p><b>B) Siltation and run off</b> - not satisfied that proposal has sufficient elements to address increased siltation run off and impact this will have on River Till SAC sites.</p> <p><b>C) Roads</b> - concerned that no plans are present to decommission roads after felling and that they will create problems in the future.</p> <p><b>D) Felling Compensation</b> - Noted that planting of 267 ha of conifer woodland as compensation for felling TSB requests that this area be identified prior to permission being granted.</p>			<p>profiled after use.</p> <p><b>D) Felling Compensation</b> – See response to issue 26.</p>
66			2	18-Aug-09	Access routes	4, 12	<p><b>A)</b> Cyclists using NCR 68 share the same route as proposed timber haulage route.</p> <p><b>B)</b> Heavily laden cyclists not able to use escape routes to assist horse riders.</p> <p><b>C)</b> No contact with Sustrans unaware of proposals.</p>	<p>Annex 12 Appendix VII</p> <p>Further information to Annex provided in June 2010.</p>	N/A	See response to issue 2.

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67			2	18-Aug-09	Road Access	12 Appendix x 18	<p><b>A)</b> No further public meetings to discuss proposed routes with local community,</p> <p><b>B)</b> concerns about stress to local routes from flooding.</p> <p><b>C)</b> use of bypass not suitable due to right angled turn on to proposed by pass from minor road.</p> <p><b>D)</b> Continued access concerns with lorries turning on to A697.</p> <p><b>E)</b> Need to use Middleton Hall access mentions of possible archaeological features that effect route across SSSI objection. Alternative suggested route via Middleton hall no analysis of difficulties of route.</p>	<p>Annex 12 Appendix VII</p> <p>Further information to Annex provided in June 2010.</p>	N/A	<p>See response to issue 2.</p> <p>ES Annex - Appendix VII shows problems associated with South Middleton route with fixed point photography and description of work required to complete a route capable of carrying a laden timber lorry. Visual scar of new road constructed would be seen crossing Middleton Craggs inside the NNPA boundary.</p> <p>Implications of the South Middleton route considered were assessed in greater detail in a third ES submission to FC and was consulted on in June-Sept 2010.</p>

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68	Rebecca Randall	Environment Agency	2	19-Aug-09	Hydrology and flooding risk	5 Appendix 21	EA considers information in Annex insufficient to confirm the potential for increased flood risk. Concerns that proposal could result in increased flood risk to TSB House and bridges downstream, cannot be determined until FRA has been undertaken. Highlighted previous comments relating to:  * Otters and implementation of plan to safeguard.  * Welcomed proposed sampling but highlighted desire to increase the water sampling and number of rain gauges over those highlighted in JBA (ES appendix 21) report.	Annex 5.2.5 Appendix VIII.	(c), (d), (f), (h), (i)	See response to issue 11.  A Food Risk Assessment was undertaken as a desk based exercise to gauge the impact of the woodland removal from the catchment. Mitigation measures to slow water were also outlined to demonstrate how the increase of peak flow rates will be managed to avoid flooding of TSB House.  The desk based modelling was completed and mitigation measures were detailed and this was provided to EA by the applicant. EA's response to the assessment was to accept the proposal, with the mitigation measures, would reduce any flood risk.  A response on the issue of water sampling is provided under issue 12. A condition of FC consent makes provision for water sampling at Harelaw and Roddam burns (as per the Figure 2.1 of the ES Appendix 21) plus additional sampling outside the TSB catchment.
69	Rebecca Randall	Environment Agency	2	19-Aug-09	Otters	6.3.2 Appendix 5	Otters mentioned inhabiting pools and watercourses. ES states disturbance of otters using resting areas during felling proposals conflict with legislation. Comprehensive protection plan to be implemented need to be submitted before work prior to determination.	Annex to Appendix 9 – TSB Replanting Programme	(c), (d)	The ES found evidence of otters at TSB and recognised the need to work within the legislation that protects them.  A general condition of our consent will draw attention to the need to follow all relevant legislation which includes the HEuropean Protected Species Guidelines will be followed and implemented by contractors working at TSB. This will require a survey of the site before work to identify the presence of any EPS or their homes. The survey will be used to identify areas of possible activity and guidelines must be followed. If necessary the applicant will need to apply for a licence to carryout the work. FC are satisfied the legal requirements to protect otters will ensure no adverse impact on any animals present at TSB.  riparian zones with broadleaves will be undertaken within the first year of conifer felling ensuring riparian habitat has opportunity to establish over the 12 year restoration period.

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70	Rebecca Randall	Environment Agency	2	19-Aug-09	Hydrology	6	Access roads to bridge watercourses with clear span bridges when new roads built.	Amendments to Annex provided in June 2010	N/A	<p>No new water-crossings that would need a single-span bridge are planned. However, where culverts are installed or upgraded will only be installed after written consent has been obtained from the Environment Agency. This is required under the Land Drainage Act 1991.</p> <p>EA have confirmed that the application for consent will need to cover:</p> <ul style="list-style-type: none"> <li>i) Justification for the use of culverts rather than clear span bridges for crossings.</li> <li>ii) Identify impacts on watercourse likely due to culverts, and iii) details of mitigation proposed to allow wildlife to pass through, working method statement mitigate effects during construction. (note that land drainage consent is separate to the EIA process).</li> </ul> <p>All new construction will follow the principles and requirements laid out in the Forest and Water Guidelines.</p>
71			2	17-Jul-09	Access Route	12 Appendix x 18	Concerned about lack of up-to-date information. Also who will decide the route to be used by timber lorries not considered alternatives.	Annex 12 Appendix VII  Further info to Annex provided in June 2010.	<b>N/A</b>	<p>See response to issue 2. Prior to the final selection of the access route a meeting was arranged on 15<sup>th</sup> Oct 2009 and was attended by members of Ingram Parish Council. At this meeting the applicant reviewed proposed haulage route, resolved issues and explained what was planned to be done to make route suitable for long term haulage.</p> <p>Subsequently, as a result of comments received from NCC highways the applicant submitted revised proposals in June 2010 which included a change to the proposed timber haulage route, moving to the access via South Middleton. This route does not affect the communities and properties that would have been affected by the previously proposed route. As a result concerns over the impact of the route via A697 via Brandon and Beamish Valley are no longer relevant. See issue 72</p>
72	Dick Phillips	Highways Northumberland county Council		15-Jan-10	Access Route	12 Appendix x 18	A verbal objection to route being chosen for timber haulage to A697 via Brandon and beamish Valley. <b>A)</b> Road junction with A697 from C class Ingram valley road at Brandon Cottages has been to be deemed unsafe for timber lorries to use due to sight lines.	Annex 12 Appendix VII  Further info to Annex provided in June 2010.	N/A	<p>See response to issue 2.</p> <p>Following a site visit with Applicant and NCC a formal reply from NCC to the consultation was requested which would set out NCC's reasons and evidence for objections in writing.</p> <p>FC ultimately received draft objection to timber haulage route, on reflection NCC's preferred haulage route is via South Middleton objection based on access route safety at junction with A697 and after further analysis the route via South Middleton was ultimately selected.</p>

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							<p><b>B)</b> Road between Calder and Reverley green is not capable of with standing timber lorries.</p> <p><b>C)</b> NCC would like ES to consider access via South Middleton and require road to be constructed over open hill ground to forest.</p>			
73	Liz Lightboure	Planning Officer, Environment Agency		04-Feb-10	Hydrology and flooding risk	5 Appendix x 21	<p>Replied to letter from previous concerns about water sampling summary of recommendation. Requested that:</p> <p><b>A)</b> Extra water sample point on Harelaw Burn be included.</p> <p><b>B)</b> Change in the unit of measurement for phosphorus sampling from milligrams to micrograms.</p> <p><b>C)</b> Pre-felling sampling be changed from bi-monthly to monthly intervals.</p>	Annex 5.2.5 Appendix VIII.	(f)	<p>Recommendation noted in decision process and accounted for in the conditions of consent. See response to issue 12.</p> <p><b>A)</b> Additional sampling outside the TSB catchment will be required as a condition of consent as is water sampling at the locations in figure 2.1 of ES Appendix 21. This will allow monitoring of the operations affect on water quality to be assessed and allow for any wider climatic effects to be accounted for.</p> <p><b>B)</b> The precision of phosphate measurement will be micrograms to ensure meaningful results.</p> <p><b>C)</b> As a condition of consent the frequency of water sampling will be to monthly prior to and during felling then afterwards it will reduce every two months for 3 years during the winter.</p>
74	Mr Hayes	Highways Department Northumberland County Council		15-Mar-10	Access Route	12 Appendix x 18	<p>Formal letter relating to concerns of safety at Brandon Cottages:</p> <p><b>A)</b> Vertical sight lines insufficient.</p> <p><b>B)</b> In adequate road width for turning HGV traffic.</p>	Annex 12 Appendix VII Further information to Annex provided in June 2010.	N/A	See responses to issues 2 and 75. FC asked the applicant to consider objections and consider alternatives to route in the ES. NCC ultimately preferred the route via South Middleton which was ultimately selected.
75				23-Mar-10	Access Route	12 Appendix x 18	<p><b>A)</b> Concerns about implications of the use of the South Middleton route and need to construct road across Ilderton Dene escarpment and threats to archaeology this poses. Possible solution to use</p>	Annex 12 Appendix VII Further information to Annex provided in June 2010. ARS Ltd Report.	(q)	<p>Concerns about timber haulage via South Middleton and the route's affect on the Neolithic archaeology and medieval remains to the north of the forest were passed to the applicant for them to address.</p> <p>The location of the known archaeology was presented as part of the additional information to chapter 11.2 (Map 1). This map showed all the known archaeology in the vicinity of the proposed access route and the new forest road that would need to be constructed.</p>

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							<p>temporary bridge at Brandon ford.</p> <p><b>B)</b> Route to be checked by archaeologist to check for remains NNPA to be advised.</p>			<p>A third consultation on the proposal focused on the access route via South Middleton and it impacts. Two responses highlighted concerns for the archaeology and stated that English Heritage (EH) guidelines should be followed in the assessment of archaeology. EH also responded to the consultation and provided guidance to their requirements for an onsite evaluation. The concerns were discussed with FC's Archaeologist, Mr Tim Yarnell.</p> <p>This led to a desk based assessment and onsite evaluation which provided sufficient evidence to assess the proposal's impact on the historic landscape. The brief for this assessment was provided by the NNPA archaeologist because it was also needed to fulfil one of the conditions of NNPA's agreement to allow the road under the Permitted Development Order.</p> <p>The assessment was made by Archaeological Research Services (ARS) Ltd. and made a number of recommendations which will be included as conditions of our consent to prevent any damage to unknown features. EH subsequently asked for an additional mitigation strategy to include measures to protect any archaeological remains uncovered during road construction. This was prepared and submitted by the applicant.</p> <p>NNPA's archaeologist has also reviewed the site and has indicated that the proposed approach is acceptable.</p> <p>The proposals for the South Middleton route are therefore not considered to have a significant effect on cultural heritage but compliance with the conditions of GDPO consent awarded for the road by NNPA is a condition of EIA consent. These make provision to protect archaeology and require obedience to a watching brief to log and protect any features identified during road construction.</p> <p>The applicant identified the location of the Scheduled Ancient Monuments (SAMs) in the ES (11.2) and detailed them and other sites of archaeology and cultural heritage in the (Appendix 8). During the original consultations, including the proposed timber extraction route to the A697 via Brandon and Beamish Valley, no concerns were raised in relation to possible effects on archaeology and cultural heritage.</p>

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76	Liz Lightboure	Environment Agency,		27-Apr-10	Access Route	12 Appendix 18	<b>A)</b> Watercourses preferred crossing using clear span bridges with spec of clearance of 5 meters and width of 5 m between banks. <b>B)</b> Land drainage consent required to cross river.	Annex 12 Appendix VII  Further information to Annex provided in June 2010.	N/A	See response to issue 70.
77			3	06-Aug-10	Archaeology	11, 12	Concerns made about impact of proposed road upgrade on nearby archaeology.	Further information to Annex provided in June 2010.  ARS Ltd. Report	(q), (r)	See response to issue 75.
78	Liz Lightbourne	Environment Agency	3	12-Aug-10	Access Route	12	<b>A)</b> Highlighted the need to use correct size culverts not to impeded water flow where route crosses small watercourses allowing free passage of water.  <b>B)</b> Concerns about use of culverts and not single span bridges needs justification for culverts and Lilburn needs to demonstrate risk posed by river crossings can be mitigated with specification for construction of road/culverts.	Further information to Annex provided in June 2010.	N/A	The response to issue 70 identifies need for land drainage consent to be agreed.
79	Jane Morton	Natural England		09-Aug-10	Landscape	10 Appendix 9	Raised issue about the methodology not meeting standard they expected.  <b>A)</b> Landscape and Visual Impact Assessment should make it clear whether the project will be in keeping with NCA area.	Annex 10  Further information to Annex provided in June 2010 (Appendix 18B)	N/A	There is no defined standard for landscape assessments under EIA regulations. The industry standards that exist, such as those of the Institute of Environmental Management and Assessment are a useful reference but they are not statutory.  In this case it is the FC's view that the landscape assessments that have been carried out are satisfactory to allow the assessment of the impact of the project on the landscape. FC discussed landscape assessment with NNPA who confirmed they were content with landscape appraisal and had in fact approved the construction of the new

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							<p><b>B)</b> Assessment of landscape sensitivity is needed.</p> <p><b>C)</b> Visual impact assessment not to standards.</p> <p><b>D)</b> No cumulative impact assessment.</p>			timber access route in their capacity as Local Planning Authority. On the basis of this response FC consider the landscape assessment to be adequate.
80			3	25-Aug-10	General	12	<p><b>A)</b> Felling of woodland.</p> <p><b>B)</b> Disturbance of archaeology.</p> <p><b>C)</b> Suitability of road from South Middleton to A697. Asked about original plan and method proposed for route for timber extraction at the time TSB was planted.</p>	<p>Further information to Annex provided in June 2010.</p> <p>ARS Ltd Report</p>	(e), (r), (q)	<p>A) Covered within the ES and considered in the Decision Summary.</p> <p>B) See response to issues 71 and 81.</p> <p>C) Three options were considered for the timber extraction route. As a result of comments from NCC highways the other two routes were severely constrained and the applicant altered the proposal to make use of the South Middleton route. This was NCC Highways' preferred route. No records are available of the intended route for extraction of the timber when the site was planted. The nature of the timber transport machinery available has changed since the time TSB was planted and as such any early plans would not have been applicable.</p>
81				27-Aug-10	Archaeology	12	<p>Supplied report showing additional archaeology not included in Sites Monument Record two sites fall within 30 metres of proposed route and 1 site included in the area to be felled concerned unknown archaeology will be disturbed. Indicates area has other unknown sites which need protecting and will influence route of proposed road.</p>	<p>Further information to Annex provided in June 2010.</p> <p>ARS Ltd Report</p>	(r), (q)	<p>The applicant carried out an archaeological survey of TSB forest and the surrounding area, involving a desk based exercise and a walkover survey, and has prepared a detailed mitigation strategy to protect known and unknown archaeological features. See also the response to issue 75.</p>
82				05-Sep-10	Access Route	12	<p>Requests that if used the route to the A697 from South Middleton has restrictions on time of use of road to cause as little disruption as possible to residents. Concern about risk to school bus and residents</p>	<p>Further information to Annex provided in June 2010.</p>	(e)	<p>See responses to issues 2 and 38. A condition of FC's consent for the proposals is that the applicant will consider the impact of their working practices on the local residents and agree them with FC before work begins. This will include consideration of timber haulage. The change to the proposals to carryout the work over 12 rather than three years will reduce the average number of timber lorries from 40 to 10 per week. This is a significant reduction though the frequency of haulage vehicles using the route will vary in intensity.</p>

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							travelling single track road at same time as timber lorries.			
83	Elaine Rigg	NNPA		06-Sep-10	Access Route	12	Letter states that consent for the South Middleton Road has been confirmed under the Permitted Development Order and accepts that road will have adverse effect on the landscape. Letter states that route is not preferred option and NNPA is not convinced that all options have had been fully considered and questions asked by the NNPA to the NCC have not been answered about using routes via Roddam and Brandon.	Further information to Annex provided in June 2010.	(q), (r)	See response to issue 75. The issues considered by the NNPA under the General Permitted Development Order 1995 related to the landscape, archaeology, breeding birds, and after care of the road following completion of tree felling. These issues and NNPA's views have been considered by FC and are reflected in the conditions of EIA consent for the project.
84				05-Sep-10	Archaeology		Considers the South Middleton Route unacceptable.  <b>A)</b> Considers unacceptable lack of thorough and suitable assessment of the impact on the cultural heritage of the area for both known and unknown sites along the proposed route for the new roads. States EH guideline that minimum standard a desk exercise completed by an appropriate expert states not included in ES along with a fieldwork to reconnaissance programme to	Further information to Annex provided in June 2010.  ARS Ltd Report	(s)	(A) and (C) An independent assessment of the impacts on cultural heritage has been prepared by Archaeological Services Ltd.  The brief for this assessment was provided by the NNPA archaeologist and EH have confirmed it meets the standards defined by Planning Policy Statement 5. The assessment concluded that a watching brief was appropriate and identified key stretches of road that were of concern. ARS Ltd also saw benefits to the tree felling: opening up sites for investigation and establishing links between them and the landscape. ARS Ltd and Scottish Woodlands intent to look at establishing a Heritage Lottery Funded project to investigate and catalogue the historic remains at TSB.  <b>B)</b> The archaeological survey which includes a number of recommendations to safeguard the archaeological features and the Written Scheme of Investigation will be included as conditions of EIA consent.  <b>C)</b> Three sites identified as within forest (31750, 34222, 34224) are within proposed work areas other details of known sites supplied are outside forest or not on proposed

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							<p>actually find true extent of sites effected.</p> <p><b>B)</b> The site requires long-term management plan to safeguard remains once exposed.</p> <p><b>C)</b> Current assessments do not conform to current EH guidelines and are insufficient to allow the construction of the road or the deforestation at TSB Watching brief will be insufficient mitigation for a project like this.</p> <p><b>D)</b> ES needs Annex needs to consider what will happen if sites are discovered.</p>			<p>route.</p> <p>D) A scheme of investigation has been prepared, on the standards and method and mitigation that would be taken when putting in investigation trenches and what actions would be taken in the event that unknown archaeological feature are encountered. EH confirmed this was acceptable on 4<sup>th</sup> March 2011.</p>
85	Chris Jones	NNPA		23-Sep-10	Archaeology		<p>Condition of the Permitted Development requires watching brief of site while construction of road is being completed. A brief was supplied to FC for use by applicant to prepare desk top exercise and onsite walking assessment to investigate unknown assets.</p>	<p>Further information to Annex provided in June 2010.</p> <p>ARS Ltd Report</p>	(r), (q)	<p>An archaeological survey for TSB was commissioned and reported to standard in brief provided by NNPA - see responses to issues 75 and 84.</p>

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86	Karen Wilson	English Heritage	3	13-Oct-10	Archaeology	11	Not consulted about proposal indicated that the felling area needs to be assessed along with heritage of assets, and impacts on known and unknown assets. Recommends:  <b>A)</b> Desk based assessment of proposal of construction corridor.  <b>B)</b> On site evaluation of construction corridor to brief agreed with National Park archaeologist.  <b>C)</b> Brief to contain mitigation that needs to be taken if assts have been discovered.	Amendment to Annex provided in June 2010.  ARS Ltd Report	(r), (q)	Survey of Archaeology of TSB was compiled on behalf of applicant by Archaeological Research Services Ltd. This followed a brief prepared by NNPA Archaeologist. EH later confirmed this assessment covers all points required on both the roading and on site proposals.  Compliance with the recommendations to protect unknown sites in the ARS Ltd. report are conditions of GPDO consent and EIA consent and this requires compliance with the Archaeological Watching Brief prepared by ARS Ltd.
87	Forestry Commission		3	10-Dec-10	Time-scale.	All	Time-scale of EIA consent is ten years. Proposals now span 12 with the last felling coupe outside EIA deadline consent period.	Annex Maps – 12 Year Felling Programme	N/A	Replanting will be covered in third felling Licence application and the last coupe on maps will be removed from EIA decision.

#### Conditions of consent

Condition (a): The proposals hereby permitted shall be commenced before the expiration of two years from the date of this permission.

Condition (b): No work shall be carried out in relation to the relevant project after the expiration of ten years from the date of this permission.

Condition (c): Works relating to the deforestation permitted by this consent shall not be carried out otherwise than in accordance with the plans and specifications approved by Forestry Commission unless otherwise agreed in writing with Forestry Commission. Specifically:

- The felling programme will adhere to the felling plan attached to the statement of reasons (Plan 1) and the schedule in the table below (table 2 in the statement of reasons).
- The replanting programme at Threestoneburn will adhere to the restocking plan attached to the statement of reasons (Plan 2) and the schedule in table below (Table 2).

(Table 2) Schedule showing sequence and timing for felling and restocking.

Phase	Felling area (hectares)	Time period for felling	Replanting and new Planting Areas detailed in ES (hectares)	Compensatory Replanting (locations still to be identified (hectares)	Time period for planting
1	101.3	Jan 2012 to Dec 2013	69	0	Oct 2011 to April 2014
2	143.2	Jan 2014 to Dec 2015	59	0	Oct 2014 to April 2016
3	103.2	Jan 2016 to Dec 2017	8	75	Oct 2016 to April 2018
4	84.6	Jan 2017 to Dec 2018	0	45	Oct 2018 to April 2020
5	93.3	Jan 2019 to Dec 2020	9	50	Oct 2020 to April 2022
6	<i>41.8</i>	<i>Jan 2021 to Dec 2022</i>	<i>13</i>		<i>Oct 2022 to April 2024</i>
<b>Total</b>	<b>567.4</b>		<b>158</b>	<b>170</b>	

**Information note:** The final phase of felling marked in italics lies beyond the ten year time-scale of the EIA consent. At the time of the final phase of felling a further EIA Opinion will be required to assess the deforestation at this time. Note also that the award of felling permission for phase 5 will be subject to condition (m).

Condition (d): The areas of woodland planted or retained under this project 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.

Condition (e): The working arrangements, including the times for timber traffic, road construction and tree felling operations, on the site will be agreed with Forestry Commission before work begins.

Condition (f): The applicant will undertake water sampling at the location shown in Figure 2.1, ES Appendix 21. In addition to this the applicant will undertake water sampling on water courses outside of the Threestoneburn catchment at locations agreed with the Environment Agency. The sampling will assess the determinands listed in ES Appendix 21<sup>1</sup> but with Phosphorous measured in micrograms. Sampling will be conducted each month throughout the year over the period of this EIA consent (see conditions (a) and (b)). Sampling start prior to the first phase of tree felling. Water sampling results will be supplied to Environment Agency at a predetermined frequency with notification of these results the supplied to Forestry Commission. If the levels of determinands (such as phosphorus, ammonia and aluminium) do not meet Environment Agency guidelines the applicant must cease felling immediately and undertake actions to rectify water quality to satisfy these guidelines.

Condition (g): A 100 metre buffer zone will be established around any private water supplies where machinery usage will be restricted and no subsequent mulching or drainage will be carried out.

Condition (h): The restoration of the open habitat sites within Threestoneburn forest will be carried out following the methods and specifications contained in the Environmental Statement. De-stumping will only be carried out after a detailed site risk assessment has been prepared and accepted by Forestry Commission. No mulching that would lead to significant soil disturbance will be carried out unless a detailed site risk assessment has been prepared and accepted by Forestry Commission.

Condition (i): The applicant will keep interested parties, including NNPA, Natural England, NWT and Forestry Commission informed about the progress of the project through submission of an annual report and will consult with them on an annual basis as the project is implemented. This report will be made public with the exception of agreed confidential information, e.g., reference to any raptor nests.

Condition (j): Before each coupe of tree felling begins a survey for nesting raptors will be made and the applicant will adhere to the guidance provided in Forestry Commission Bulletin 115: Ecology and Conservation of Raptors in Forests (Petty, 1998).

Condition (k): Any deer fences used to protect the young trees during their establishment will be erected following the relevant recommendation in Black Grouse Recovery Project North Pennines [Information Sheet 1: Fence Collisions and marking](#).

Condition (l): The applicant will follow all the recommendations in Appendix III to the ES Annex (Red Squirrel Survival Survey) and within 12 months of commencing the first phase of felling the applicant will carry out the first phase of planting at Threestoneburn as per approved plan (Plan 2). At least 30% of the replanting mixture at Threestoneburn will be hazel (at least 15% by area with understorey planting to ensure 30% hazel)) will be hazel to create a food source for red squirrels. Before felling operations a survey will be undertaken to locate red

squirrel dreys. In planning and carrying out tree harvesting the guidance in section 4 of [Forestry Commission Scotland Guidance Note 33: Forest operations and red squirrels](#), will be followed.

Condition (m): Phase 5 of the felling programme (see table 2, plan 2) may not commence until the first phase of trees planted at Threestoneburn are producing seed and Forestry Commission is satisfied the woodland is capable of sustaining a population of red squirrels. Failing this the applicant will need to satisfy Forestry Commission that an alternative strategy is in place to sustain the local population of red squirrels.

Condition (n): Within 12 months of commencing the project a strategy for grey squirrel control in the vicinity of Threestoneburn, including an appropriate contribution to landscape scale monitoring, will be agreed with the Red Squirrel Northern England project and the Forestry Commission. The strategy will be implemented on an ongoing basis.

Condition (o): Access ramps constructed during the felling period to allow forwarder access from the forest roads to the felling sites will be removed, backfilled and reinstated. This will be done as soon as they are no longer needed for site restoration or timber extraction.

Condition (p): The applicant will comply with all requirements of NNPA's planning consent, under the General Permitted Development Order 1995, to construct the access track between South Middleton and Threestoneburn forest.

Condition (q): Following the felling of the high level coupes at the eastern side of Threestoneburn and before the expiration of 9 years from the date of EIA consent the applicant will prepare and submit a detailed assessment, including a landscape assessment, covering the decommissioning options for the existing high level road line. The applicant will carry out and complete the road decommissioning agreed with Forestry Commission, before the expiration of ten years from the date of EIA consent.

Condition (r): The applicant will implement both the recommendations included in the Archaeological Survey of Threestoneburn forest and the Written Scheme of Investigation: Archaeological Watching Brief, prepared by ARS Ltd.

Condition (s): Archaeological assets exposed during the tree felling will have long-term management plans prepared by an appropriately qualified person.

Condition (t): Within five years from the EIA consent, the applicant will identify and secure approval from Forestry Commission for the location(s) intended for the planting of a minimum of 170 hectares (net planted area) of new woodland. The site or sites will be planted within five years of obtaining Forestry Commission approval, i.e., the locations will be planted within ten years of the EIA consent. The locations should not be more than 160 km from Threestoneburn. The proposed planting areas should include at least 60% productive conifers by area to compensate for the loss of carbon storage at Threestoneburn. It will be the applicant's responsibility to identify a site or sites where this planting mix would be appropriate, taking into account any consultation responses received. If the proposal includes a lower proportion of productive conifers the applicant will carry out a carbon assessment of the proposed woodland and increase the planting area in order to achieve an amount of carbon storage equivalent to a 170 hectare woodland (net planted area) with 60% productive conifers at yield class 12.

Condition (u): The applicant will not apply for, seek to obtain or accept carbon related funding or carbon offsetting payments in relation to the compensatory planting area.

Condition (v): The planting to provide compensatory carbon storage will take place over no more than three sites. The planting at each site must be approved by the Forestry Commission and will take account of any consultation responses received.

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<sup>1</sup> **Determinands of water quality:** pH (pH value), Biochemical Oxygen Demand (BOD) (milligrams per litre), Dissolved Oxygen (DO) (milligrams per litre), suspended solids (SS) (micrograms per litre), ammoniacal-nitrogen (milligrams per litre), nitrate-nitrogen (milligrams per litre), phosphate (micrograms per litre), aluminium (milligrams per litre), iron (micrograms per litre) and potassium (micrograms per litre).