



**Response by Transition Wilmslow to Cheshire East Council on Planning Application 15/0016M: proposed residential development at Lindow Peat Farm, Moor Lane, Wilmslow.**

## **Summary**

**Transition Wilmslow wishes to support in principle this application for residential development on the current peat processing ('Peat Farm') site at Moor Lane, Wilmslow.**

**We have several reservations about this proposal, not least the fact that this will involve development within the Green Belt. However, the key issue for us is that approval of this development would facilitate the related Planning Application 15/0064M which would bring an end to commercial peat extraction on Lindow Moss itself, a site of national significance for its archaeological interest, cultural heritage and ecological potential. In conjunction with approval of this application, the land owners would cease commercial peat extraction, accept the revocation of inappropriate planning conditions requiring backfill with inert waste and restoration to agriculture, and initiate a programme of landscape restoration towards a complex of wetland habitats, with public access and provision for after-management. It is this that, in our view, constitutes the *'very special circumstances'* needed to justify development in the Green Belt.**

**In addition to the Green Belt issue, our reservations include: landscape and visual impact on the Lindow Moss landscape character area, loss of woodland, impact on nature conservation, loss of features of archaeological/historic interest, loss of an opportunity for countryside access and heritage interpretation, poor land capability for housing and lack of provision for affordable housing. Despite these concerns, we note that the development has some positive attributes: providing housing on what is in part a brownfield site, in design terms (layout and sustainability features) and that some, at least, of the negative impacts will be mitigated.**

**We have made a number of comments on the application as submitted (as numbered recommendations in bold within the text). We request that these observations are taken into account in determining the application.**

## **Transition Wilmslow and the New Vision for Lindow Moss**

Transition Wilmslow is part of the Transition Towns movement in the UK, which seeks to promote community action to improve the sustainability and liveability of their localities. We have given a high priority to developing a 'New Vision for Lindow Moss' which seeks to promote the restoration of the peatland core and the conservation and interpretation of that and the wider Lindow Moss landscape. This wider area is broadly congruent with the Lindow Moss Landscape Character Area, M2 in the Cheshire County Landscape Character Assessment (Cheshire County Council, 2008) which has been formally adopted by Cheshire East Council.

The New Vision for Lindow Moss was developed through a Workshop in April, 2014 which involved key government agencies (Natural England, English Heritage and the Environment Agency), Cheshire East Council, Cheshire Wildlife Trust, Saltersley Common Preservation Society, user groups and local residents. The Workshop was convened by Transition Wilmslow and facilitated through a pro-bono contribution from the consultants ARUP. The New Vision is summarised below:

*Lindow Moss is one of the most significant peatland landscapes in Britain and yet it remains abused, neglected and officially unrecognised. Through this New Vision those who care about the future of Lindow Moss are coming together as the Lindow Moss partnership to restore, conserve and celebrate this uniquely important landscape. This will involve:*

- *Cessation of peat extraction and restoration of the peat working area to create an attractive natural habitat and to re-establish the Moss as a carbon sink*
- *Protection of the wider historic landscape of Lindow Moss*
- *Improved access for recreation and exercise, for all ages and abilities*
- *Creation of an area where flora and fauna can flourish and be appreciated*
- *Interpretation of the rich natural and human history of the Moss, including Lindow Man, to enhance education and understanding*
- *Establish a 'green tourism' destination whilst maintaining its natural character*
- *Recognition of Lindow Moss as a Green Infrastructure Asset in the Cheshire East Local Plan and a 'green lung' for the people of Wilmslow and beyond*

**R1: Approval of this planning application (15/0016M), will facilitate a related application (15/0064M) which presents an opportunity to secure a key objective of the New Vision, namely cessation of peat extraction and restoration of the peat working area to create an attractive natural habitat and to re-establish the Moss as a carbon sink, and recreational asset. For this reason it has our in principle support. We have suggested in our response to application 15/0064M that the planning authority considers requiring a Minerals Planning Bond, linked to the benefit associated with consent on this application, which would be drawn down as the restoration of the Moss proceeds.**

## Transition Wilmslow's Assessment of Application 15/0016M

Whilst this application for residential development on the 'Peat Farm' site has some positive attributes, it also has a number of potentially negative impacts, not least because it would constitute inappropriate development in the Green Belt.

In preparing our response we have read the Planning Application Document, and supporting documents. We have also drawn on the expertise of advisors in the Faculty of Science and Engineering at Manchester Metropolitan University and the Faculty of Humanities in the University of Manchester, but the views expressed are entirely those of Transition Wilmslow. The proposal is assessed against the 'Saved Policies' of the Macclesfield Borough Council Local Plan:

### Natural Environment

#### Policy NE2: Protection of Local Landscapes

**This policy is about 'conserving and enhancing the diversity of landscape character areas, and ensuring that any development respects local landscape character'.**

The application recognises properly that this development falls within the Lindow Moss landscape character area, M2 in the Cheshire County Landscape Character Assessment (Cheshire County Council, 2008). This is characterised by peaty soils, a distinctive field pattern (typical of the enclosure of former peat workings, known as 'moss rooms'), patches of secondary woodland, and with heathland on the sandy fringes. Professor Nick Higham in the Environmental Statement which accompanies both applications speaks of the wider area as '*one of the major mosses of the north-west of England, both archaeologically and historically*' (Para 8.5.1) and '*a major feature of the landscape and of the cultural heritage*' (Para 8.5.5). He goes on, within the Environmental Statement, to explain the significance of the 'moss rooms' in some detail:

*'To the south and east, the dominant field systems visible on late 19<sup>th</sup> century maps, characterised by very long, thin, hedged enclosures, reflect the use of mossrooms to dig out peat, largely as fuel, which was a resource of particular importance to the growing population of Wilmslow itself, and which was controlled by complex rules. Lindow has the best surviving pattern of such mossrooms enshrined in the modern field system beyond the site boundary to be found anywhere in the north-west.'* Para 8.5.9.

The 'site boundary' referred to here is clearly the main peat extraction site (15/0064M) for, as Prof Higham makes clear in his archaeological assessment of the Peat Farm site (15/0016M)::

*'The bulk of the area of proposed residential development originates as part of a narrow field running north-south on the Wilmslow side of the parish and township boundary with Mobberley. It had clearly been enclosed from the moss. This and the immediately adjacent field to the east...almost certainly originated as mossrooms, accessible from Moss Lane, and were dug for peat before being enclosed as*

*agricultural land.*’ Para 1.4.4 of Archaeological Appraisal of the Residential Development (Appendix 12.1)

**R2: Transition Wilmslow is strongly committed to protecting the integrity of the Lindow Moss landscape character area. We have requested that the special significance of the Lindow Moss landscape character area (LCA) be recognised in the Cheshire East Local Plan. In line with ‘Saved’ planning policy NE2, we would normally resist applications for urban development that encroach onto the LCA even where, as in this case, the landscape has been significantly modified by its subsequent use.**

The applicants’ Landscape and Visual Appraisal (Appendix 8.1) recognises that to the north of the peat processing plant and associated hard standing, there is a woodland of ‘*moderate/high sensitivity*’ (Para 1.4.2) and this would be impacted by the development:

*‘A larger group of semi-mature deciduous trees in the northern part of the site would require removal to allow the construction of the five most northerly houses; replacement or future planting would not be able to replace all these trees...the effects of the change would be significant.* (Para 1.4.4)

The Landscape and Visual Appraisal states that the adverse effects of tree removal would be mitigated by ‘*woodland beyond the site boundary*’. It is not easy to establish from the applications just how much woodland will remain, but it appears to be a rather narrow strip of perhaps 20m.

**R3: If the two planning applications are approved, the views in future from the central access track across the restored Lindow Moss will be critical. Looking south, from that track, the new housing will need to be screened off to retain the special character of the Moss itself. The Applicants’ visual impact assessment does not appear to have assessed the development from this perspective and we are concerned that, following removal of much of the woodland in the northern part of the application site, the residual tree screen may be ineffective (but see R5 below).**

### **Policy NE7 Woodland Management**

**This policy seeks to retain and enhance existing woodlands by woodland management and ‘*development which would adversely affect woodlands will not normally be permitted*’.**

Around one third of the application site, at its northern end, consists of mature deciduous woodland. A substantial portion of this woodland will have to be removed to make way for five of the new houses. The Arboricultural Report downgrades the two main woodland blocks (G17 and G18) to Category C (trees of low quality and amenity value) on grounds of ‘*lack of diversity, with regard to species, age and layers*’. This woodland seems to have originated as a 19<sup>th</sup> century enclosure within the Moss (Appendix 2.1, Para 1.4.5) and its species composition is very typical of the woodlands elsewhere in the Lindow Moss landscape, consisting as it does of oak, birch, pine and an understory of holly and rowan. Looking at the criteria in Table 1

p30 of the Arboricultural Report it is very difficult to understand why these woodland blocks are not classified into Category B – trees of moderate quality and amenity value. Similarly, the fine isolated oak tree (T1 in the Survey), surely merits Grade A status, and a Tree preservation Order to safeguard it within the new development.

**R4: We are concerned that the development will impact on an attractive semi-mature woodland and trust that the planning authority will seek to minimise this, without putting at risk the viability of the whole project. We also consider that the fine isolated Oak tree (T1) on the plan merits a Tree Preservation Order. The loss of woodland here reinforces our concern about proposed removal of woodland in the related application (15/0064M).**

One component of this woodland is Holly (*Ilex aquifolium*). Holly is a natural component of the damp oak woodlands that characterise the wider Lindow Moss landscape. The Holly often forms a dense understory and in the fringing woodlands at Lindow Common SSSI for example, this provides a very effective tree screen.

**R5: One possible solution to the problem of screening off the future housing development from the Moss (see R3 above), may be to underplant the residual woodland with native Holly.**

## **Policy NE11 Nature Conservation**

**This policy is about ‘seeking to conserve, enhance and interpret nature conservation interests, development which would adversely affect nature conservation interests will not normally be permitted’.**

Around half the application site consists of a mixture of buildings and hard standing, with mixed broadleaved woodland occupying the northern end of the site. The buildings themselves provide a roost site for Common Pipistrelle bats. This is one of four bat species utilising what the Bat Survey Report (Appendix 11.2) describes as ‘*excellent bat foraging habitat in the immediate environs of the location*’. The buildings themselves are to be demolished and the Bat Survey recommends a number of related good practice and mitigation measures which we endorse.

**R6: With regard to bat conservation we support the recommendations for good practice, including the mitigation measures in Appendix 11.2, and in particular the proposal to fit ‘a minimum of one in three of any new properties with Bat Access Panels and back-plates in the apex of the new houses’.**

The extended Phase 1 Ecological Survey (Appendix 11.1) reports a substantial amount of badger activity in the area and makes specific reference to a ‘*badger sett in the peat handling area*’.

**R7: With regard to badgers, we note and support the recommendations in Appendix 11.1 for licensed relocation of the badger sett in the peat handling area, prior to any housing construction on the site.**

## **Policy BE24: Development of Sites of Archaeological Importance**

**This policy requires an Archaeological Evaluation on sites of known or suspected archaeological importance.**

The Application documents include a detailed Archaeological Appraisal by Prof Nick Higham (Appendix 12.1).

The cultural heritage of the buildings on the Peat Farm site is not insignificant, since it was the chance discovery here of human remains which triggered a full-scale archaeological investigation, leading to the recovery of Lindow Man, an almost intact bog body. Furthermore, the buildings and their associated artefacts document many aspects of the history of peat extraction on the site, and could be key to its interpretation. A detailed photographic record of the buildings may facilitate augmented reality visualisation which could be helpful in future interpretation.

**R8: We strongly support the recommendations in the Archaeological Appraisal (Appendix 12.1) to maintain a watching brief during trenching and other on-site excavations for features of interest to archaeology and palaeoecology, including the funding of necessary laboratory work associated with finds of sub-fossil wood. We also support the proposal for a full measured survey and photographic record of the peat processing buildings prior to demolition, to be lodged at the Cheshire County Record Office. We suggest that artefacts relating to the history of peat extraction, especially the light railway, be retained and conserved, for future interpretation within the restored Moss.**

## **Green Belt and Countryside**

### **Policy GC1: New Buildings in the Green Belt**

**This policy makes clear that approval will not be given to new buildings in the Green Belt ‘*except in very special circumstances*’.**

The application explores at great length the extent to which the objects of the Green Belt would or would not be compromised by the proposed residential development. We are inclined to agree that the orientation of the site, coupled with the careful design of the housing layout means that the development would be relatively unobtrusive. Nevertheless, this development is not compatible with Policy GC1, and indeed the National Planning Policy Framework, unless ‘*very special circumstances*’ apply.

**R9: We consider that in this case ‘very special circumstances’ do apply to permit the residential development on this site because it facilitates an end to commercial peat extraction, rescinds the inappropriate planning conditions and initiates a programme of ecological restoration on the Moss itself, as detailed in Application 15/0064M. We have commented separately on that application.**

## Recreation and Tourism

### Policy RT8: Access to the Countryside

**This policy is about encouraging countryside access for informal recreation, whilst Policy RT13 supports, under specified circumstances, the provision of new tourist attractions.**

In the Applicants' Environmental Statement, at Paras 8.8.9 and 8.8.10, Prof Nick Higham comments that:

*'The exceptional archaeological and historic archive (of Lindow Moss) provide the opportunity to tell the story of Lindow in detail, illustrating the processes of bog burial and deposition, prehistoric deforestation and settlement, enclosure, land improvement and peat digging. Preservation of a proportion of the surviving moss rooms...provides an opportunity to illustrate successive processes of extraction, from hand-cutting, via mechanical extraction through to milling.'*

*'This is an important aspect of Wilmslow's local history, but also an important part of the history of Britain's wetlands more widely, which could be illustrated to great advantage within a restored bog.'*

**R10: We in Transition Wilmslow agree wholeheartedly with these sentiments and the 'New Vision for Lindow Moss' is about conserving this nationally significant heritage and realising its potential for research, education, and interpretation to a wider public.**

If the situation was unconstrained, and the objective here was to realise the full visitor potential of a restored Lindow Moss, the Peat Farm site would play a key role. The Peat Farm is the obvious place from which to access the restored landscape and, following refurbishment, the Peat farm buildings could perhaps have taken on a new role for tourism and environmental interpretation. Further south, in Shropshire, at Fenn's and Whixall Mosses, the land was acquired for the nation. Here there are two flourishing National Nature Reserves on restored mossland, managed by Natural England and with a vibrant programme of environmental interpretation. Lindow Moss has perhaps even greater visitor potential, but here circumstances are different, and it seems that facilitating restoration of Lindow Moss via residential development on this site is the only realistic way forward.

**R11: We reluctantly have to accept that residential development on the application site will foreclose opportunities here for public access, environmental interpretation and tourism. However, we welcome the proposals for access through the development site for organised educational visits, with the provision of an access point to the Moss and a hard standing area for vehicles at the north end of the site. We wonder whether this might also afford opportunities for disabled access?.**

## Housing

### Policy H2: Environmental quality in housing developments

This policy requires that *‘new residential development should create an attractive, high quality living environment.’*

**R 12:** We do not wish to comment in detail on the proposed housing development but recognise that it does have some positive attributes:

- Provides new housing on what is, in part, brownfield land
- Housing layout is innovative and carefully thought out so as to minimise landscape impact (subject to reservations in R3 and R4 above)
- Housing design incorporates some good attributes from a sustainability perspective with southern orientation of dwellings, solar chimneys, photovoltaic roof panels, wood burning stoves, a high standard of insulation and SUDS treatment for surface drainage
- Retention of tree lined fringes seeks to minimise visual intrusion
- Cessation of peat extraction means an end to movements of heavy lorries to and from the site along Moor Lane
- Access will be provided through the development to a hard standing for maintenance vehicles and minibus parking by organised groups on educational visits
- This may also facilitate disabled access to the restored Moss

**R13:** We have listed various areas of concern in the main body of our response. However, additional points might include:

- Land capability of mossland soils for housing is poor; the data for this site on substrates/soils is inconclusive but deep peats do seem to be present on at least part of the application site
- Application says little about how potential concerns for housing subsidence on unstable soils will be addressed
- No provision, as we understand it, for affordable housing on or off the site
- Access to Moor lane is not ideal, discharging traffic onto a narrow lane which is heavily used for recreation, including horse riding

## Conclusion

**R14:** Despite the reservations expressed here, and within the main body of this response, we support the application because it facilitates Application 15/0064M which brings an end to commercial peat extraction, rescinds some inappropriate and harmful planning conditions and makes possible an ecologically informed restoration scheme for Lindow Moss.

Prepared by the Planning and Environment Group of Transition Wilmslow and approved by the Transition Wilmslow Steering Group, Feb 24<sup>th</sup>, 2015

