



**Response by Transition Wilmslow to Cheshire East Council on Planning Application 15/0064M, for variation of planning conditions and the restoration of the Lindow Moss peat extraction site.**

**Summary**

**Transition Wilmslow wishes to support in principle this application for variation of planning conditions on planning permission 5/97/0758P for restoration of the Lindow Moss peat extraction site, also known as Saltersley Moss. We very much welcome the prospect of an end to peat extraction and the restoration of the extraction site. However, we have reservations about certain aspects of this proposal, as submitted. We have made suggestions (as numbered recommendations in bold within the text) about how the negative impacts of the proposal could be mitigated and also about how the proposal could be strengthened, in a positive way, so as to assure the desired outcomes. We request that these observations are taken into account in determining the application, with its associated Restoration Scheme and replacement planning conditions.**

We recognise that this application is inextricably linked to planning application 15/0016M for demolition of existing buildings and construction of 14 detached family houses on the Lindow Moss Peat Farm, at Moor Lane, Wilmslow. We will comment separately on the housing application (15/0016M) but we understand that cessation of peat extraction and progress of the restoration scheme on Lindow Moss is conditional on approval of that application. We have some reservations about application 15/0016M but we will also give that application our conditional support, in order to secure an end to peat extraction and the restoration of the peat extraction site.

**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: This application (15/0064M) 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. For this reason it has our in principle support. However, this proposal needs to be seen in the broader context of a 'multifunctional landscape' as reflected in the range of objectives which comprise the New Vision.**

In preparing our response we have read the Planning Application Document, the Environmental Statement (Volume 2: Main Report), the Restoration Scheme and supporting documents. In preparing our response we have 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. We begin with comments on the planning policy context:

### **Policy context for the application**

The Planning Application Document sets out very clearly the policies which the applicants consider to be relevant in the Local Development Plan and the National Planning Policy Framework (NPPF). The key objective of both is to promote sustainable development.

Transition Wilmslow's objects are also about improving the sustainability and liveability of our local community. The current use of Lindow Moss for peat extraction is fundamentally unsustainable and a planning application for such an activity would not be countenanced in the modern era. Furthermore, the planning conditions imposed by Cheshire County Council, under the ROMP provisions of the Environment Act 1995, make matters worse over much of the site by requiring backfill with inert waste and restoration to agriculture. That is particularly inappropriate on a site of national importance for heritage conservation and with huge ecological potential, situated as it is in a key location between the Meres and Mosses Nature Improvement Area to the south and the peatlands of the Mersey Basin Natural Area to the north.

**R2: We therefore strongly support an initiative that will bring the current land-use to an end, rescind the inappropriate planning conditions and restore the site, and we consider that this constitutes the 'very special circumstances' which are needed to justify residential development on Green Belt land on the adjoining Peat Farm site (Application 15/0016M).**

In recent months we have liaised closely with Richard Turner OBE, the archaeologist who led the discovery of Lindow Man in August, 1984. Rick Turner supports our approach to the application and has authorised us to include the following quotation from his closing remarks to the Lindow Moss Day School, held at Wilmslow Guild on October 18<sup>th</sup>, 2014:

*"Lindow Moss' more recent history is of peat cutting and the reclamation of the margins of the site. Together with its prehistoric past, this forms an important cultural landscape extending back thousands of years. As we have heard today the moss is still in a condition where it can be recreated as a lowland raised mire, something that will require the same skill and imagination shown by the artists described above. Lindow is not a bare brown prairie like those found at Thorne Moors and Chat Moss. It retains its sense of enclosure and mystery.*

*We are at a critical moment in the future of Lindow Moss as the planning designation of the site is being determined. In five hundred years do we want the burial place of Lindow Man to be similar to that of poor King Richard III? The choice is between a landfill site covered by dull rye-grass fields or a vibrant habitat buzzing with unusual plants and animals. We have the chance to return Lindow Moss into a place that Lindow Man would have recognised, and in which he met his end. His bust has stared impassively over our proceedings today. If he were able to speak I am sure he would be saying 'the time is now' and 'the people are here' to make this happen".*

The Planning Application Document lists the NPPF policies which the applicants consider relevant to this application:

### **NPPF Policy 8 is about Promoting Healthy Communities**

**R3: The Lindow Moss landscape is already heavily used for recreation and countryside access. The proposal to secure the northern E/W footpath as a permissive route, together with the main E/W track through the middle of the site is helpful. In addition we would like to see consideration of disabled access**

and specific access provision for the public to the Lindow Man findsite (see proposals below under ‘Restoration Scheme’).

**R4: We commend the statement at Para 6.3.10 of the applicants’ Environmental Statement that:**

*‘the bulk of the restored site would be wetland and as such public access could easily be accommodated without both an unacceptable risk to health and safety and unnecessary disturbance to the habitats created. Well designed wetland areas are well adapted to prevent unauthorised access whilst providing the public with views across the restored site from paths and viewing points.’*

**Part of the charm of Lindow Moss is its lack of formality and we would otherwise dread the prospect of the proliferation of fences, keep out signs and red and white plastic hazard tape. We would like to see endorsement of the applicants’ approach written into the terms of reference of the proposed Restoration Committee.**

#### **NPPF Policy 10 is about Meeting the Challenge of Climate Change**

The NPPF seeks to ‘support the transition to a low carbon future in a changing climate’, which is also one of the key objectives of Transition Wilmslow. At present peat is exported from the site and the fossil carbon within it is then oxidised to CO<sub>2</sub> and released to the atmosphere. Furthermore, peat working requires lowering of the water table within the site which accelerates peat oxidation within the Lindow Moss landscape. Following successful restoration to a bog habitat Lindow Moss will once again function as a carbon sink, capturing 1.2-2.6 t CO<sub>2</sub> equivalent per hectare per year (IUCN, 2011).

**R5: We strongly welcome the proposal to cease peat extraction and to rewet the site, with a view to re-establishing it as a complex of wetland habitats and restoring its historic function as a carbon sink.**

#### **NPPF Policy 11: Conserving and enhancing the natural environment**

**R6: In broad terms we support the proposal to rewet the site and to re-establish it as a complex of wetland habitats. However, we consider that the desire to recreate priority habitat should be balanced against other considerations such as heritage conservation and landscape amenity (see detailed comments on the Restoration Scheme below).**

#### **NPPF Policy 12: Conserving and Enhancing the Historic Environment**

We are told that at a recent meeting with the Chancellor, the Rt Hon George Osborne MP, a local businessman observed that ‘Wilmslow has two real claims to fame - Alan Turing and Lindow Man, and we don’t make much of either’. Apart from limiting further damage and suggesting some ‘low-key interpretation’ in the form of interpretive panels, the proposal does little specifically to advance that cause. In a

written submission to the Lindow Moss Workshop, April 3<sup>rd</sup>, 2013, Rick Turner made the following observations about marking the findspot of Lindow Man:

*'Bog bodies do and always have produced a remarkable response in those lucky enough to find them and those who see them preserved in museums. Interestingly, this psychological response was discussed in correspondence between Freud and Jung. The response is often literary and artistic. The discovery of Lindow Man was to provoke a world-wide reaction and a re-engagement with earlier bog bodies. This has been well summarised by Karin Saunders in her book Bodies in the Bog and the Archaeological Imagination (Chicago: Chicago University Press, 2009). The findspot of Lindow Man, and less accurately Lindow I/III, is known and could be capable of commemoration. As far as I know, of all bog bodies, only the burial place of Tollund Man (in Denmark) has a marker. Perhaps Lindow Moss could become a centre for outdoor sculpture inspired by its archaeology, history, and future uses.'*

**R7: The findspot of Lindow Man is located within Compartment 8 of the Restoration Scheme. We have made specific proposals below about how that part of the site might be conserved, marked and interpreted.**

The wider historic and archaeological significance of the site is very well summarised by Prof Nick Higham in Section 8.8 of the applicants' Environmental Statement:

*'Lindow Moss is archaeologically and historically one of the most important lowland wetlands in Britain, offering an unusually early inception, exceptional depth of stratified peat, important prehistoric archaeology and a unique group of organic remains which include human bodies of the Late Pre-Roman Iron Age and/or Roman period.*

*The exceptional archaeological and historic archive 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.'*

That, he argues, should include preservation of some of the surviving mossrooms as we have suggested below for Compartment 8.

**R8: Given the great potential of the site for scientific inquiry, education and interpretation to a wider public, the plans for the site need to be properly grounded in an Environmental Interpretation Strategy and Plan. Cheshire East Council should either require that as a condition, or alternatively commission something along these lines themselves, perhaps in association with Wilmslow Town Council and Mobberley Parish Council. We have made several suggestions about opportunities for interpretation within this submission and we would be pleased to support work in this area, so that the visitor potential of Lindow Moss can be properly realised.**

An essential part of the Lindow Moss story is the remarkable evidence in the fossil tree stumps which reveal that for hundreds of years in its early history this part of the Moss was a Pine woodland. This important environmental record may no longer be accessible once the rewetting of the site gets underway. There is currently a unique

opportunity to sample the subfossil pine woodland that has been revealed through the peat removal over extensive areas. Past small-scale research projects have revealed that this woodland grew around 5000-4000 years ago, but extensive systematic sampling of tree stumps and trunks would facilitate the production of a full site dendrochronological record permitting detailed palaeoclimatic reconstructions similar to those previously undertaken in the Humberhead Levels and in continental Europe.

**R10: There should be a systematic inventory of the subfossil pine which remains in situ before such remains are made inaccessible by rewetting.**

### **NPPF Policy 7: Requiring Good Design**

The applicants' submission in support of application 15/0064M omits NPPF Objective 7: 'Requiring good design'. Whilst this section of the NPPF is indeed focused on the built environment it has relevance for all development. For example, Para 56 states that '*Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people*'. Whilst Para 61 stresses that high quality design goes beyond aesthetic considerations and that '*planning policies and decisions should address the connections between people and place and the integration of development into the natural, built and historic environment*'.

This resonates strongly with the European Landscape Convention of which the UK is a signatory, which defines 'landscape' as:

*'Landscape means an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors'. (See ELF and Natural England Guidelines for Implementation of the European Landscape Convention)*

The landscape and visual impact assessment within the applicants' Environmental Statement does capture the 'sense of place' very effectively in Para 7.5.13:

*'With regards to landscape character, the site is again considered to be of high sensitivity. Lindow Moss is valued as a resource by the local community...Despite its location close to the edge of Wilmslow, the Moss has a remote and rural feel, due in large part to the enclosed nature of the site, which is surrounded by tree belts and small woodlands with little intervisibility through this tree screen. As such, the site has a character all of its own, with very little influence from outside. Clearly any change within the site has great potential to influence this character.'*

**However, applicants' landscape and visual impact assessment (Section 7 of the Environmental Statement) has a number of shortcomings:**

- There is an apparent lack of awareness of the most up-to-date Landscape Character Assessment of Cheshire (Cheshire County Council, 2008), which supersedes the 1994 LCA quoted in the applicants' Environmental Statement. The LCA for 2008 has been formally adopted by Cheshire East Council and is readily available on their website

- The assessment in the Environmental Statement applies a standard methodology which does not do justice to the cultural/historical dimensions of the landscape
- The assessment does not assess the landscape and visual impact of the Restoration Scheme on a compartment by compartment basis, as is necessary if the ‘saved’ landscape policies in the Macclesfield Borough Council Local Plan (January,2004) and the Cheshire Replacement Minerals Plan (June,1999) are to be properly met
- In two key locations (the Sand Hill in the NW corner of the site, and the woodland to the east of Rotherwood Rd) the landscape and visual assessment at Paras 7.4.3 and 7.6.16 is clearly referring to an earlier scheme, which did not involve substantial clearance of woodland.

**R11: In our assessment of the proposal we have sought to rebalance nature conservation and landscape amenity, and to remedy some of the deficiencies listed above.**

We now proceed to an assessment of the applicants’ Restoration Scheme itself (Appendix 2.1 of the Application) which is at the core of the proposal.

### **The Restoration Scheme**

The objectives of the Restoration Scheme are set out in Para 13, p 2/3 of Appendix 2.1. In response to that:

**R12: We support the proposal to restore the site so that multiple benefits are delivered through re-establishing ‘*functional raised bog habitat in combination with other wetland, heath and woodland habitats*’, and the restoration objectives which relate to that. However, Lindow Moss is more than a wildlife habitat, it is above all a cultural landscape. The Restoration Scheme needs to balance more effectively the need to restore priority habitats with the impact on landscape character and visual amenity, together with heritage conservation.**

We recognise that ecological restoration in this context requires habitat reconstruction or ‘*rebuilding*’ as described in the Restoration Scheme and that the successful restoration of part of the site to raised bog will involve the creation of temporary shallow water storage lagoons. The report states that the key to successful restoration is retention of a minimum depth of low permeability, well-humified peat to constrain downward seepage of water. We are concerned that the 12 month period since the Restoration Scheme was submitted has seen a particularly aggressive period of peat extraction. This has the potential to inhibit restoration to raised bog habitat and the new levels appear to call into question the viability of the hydrological regime as proposed.

**R13: There should be a moratorium on peat extraction whilst the Restoration Scheme is agreed with the Local Planning Authority. Peat depths should be checked and levels established (as required by the planning conditions currently in force) to ensure that the Restoration Scheme as submitted is still viable.**

**R14: A minor point, but it should be noted that the descriptions of expected flow of excess water between compartments in Paras 104 and 109 of Appendix 2.1 seem to be incorrect; they perhaps refer to an earlier draft and if so should be corrected.**

We now comment on the Restoration Scheme compartment by compartment (here numbering of the compartments relates to the Applicants' Fig 3.4, 'Restoration Compartments').

In this assessment we will have regard to the statement in Para 66 of the Restoration Scheme of the need '*to promote biodiversity whilst minimising landscape impact*'.

### **Compartment 1.**

We agree that the objective here should be to sustain the existing mosaic of wet heath and bog habitat. The existing wet heath in this section is a valuable habitat in its own right, and one which is not well represented in Cheshire; the areas of wet heath on Lindow Common are perhaps the best example that we have. Wet heath here complements Lindow Common and contributes to the development of a functional ecological mosaic in the wider Lindow Moss landscape.

We recognise the need to intervene so as to establish and maintain a high water table but we suggest that given the topography, and the attractive aspect of a broad stand of heather alongside the public footpath (described as high visual sensitivity at Para 7.6.15 of the Environmental Statement), the emphasis here should be, if possible, on sustaining the existing habitat complex rather than extensive landscape surgery.

**R15: We support the objective of retaining the mosaic of wet heath/bog habitat in Compartment 1, but suggest an approach which minimises the degree of intervention needed to sustain these habitats in the long term.**

The main outfall from the whole site to the Sugar Brook is located at the western corner of this compartment. We would like to see a properly engineered sluice at this point (as already required by the existing planning conditions) which is the final control point for the whole hydrological system. This would both provide a final control point for water levels from the perspective of mossland restoration but also provide an opportunity to regulate flows in time of flood, due to excessive rainfall and/or hydraulic failure within the system.

**R16: We suggest the construction of a properly engineered control sluice at the main outfall point, as already required under the current planning conditions.**

## Compartment 2

This compartment comprises the retained sand hill elevated above the peat extraction area. The applicants intended to retain this area as wet woodland but Cheshire East Council in their pre-application advice (CEC, Feb 1<sup>st</sup>,2013) requested that ‘extensive tree/scrub felling be required’ so as to establish lowland heathland.

**R17: We question the appropriateness of this advice and object to the proposal to clear the woodland because in this situation it is unlikely to result in a significant expansion of heathland, and the woodland is an attractive and valued asset in the landscape.**

The Restoration Scheme describes this compartment as ‘*heath habitat with some significant scrub incursion*’. This is a misreading of the situation. What we have here is a bracken dominated secondary woodland comprising Oak, Birch and Scots pine, with heather on the moister fringes. The dominance of bracken will be reduced somewhat as the water table rises due to changes in the wider landscape, but not to the extent required to permit a comprehensive switch to heathland, even following wholesale removal of tree cover. That in turn would have a very detrimental effect on visual amenity in this prominent location within the site. It would also result in a strong pulse of mineral nutrients into the adjoining mire. What is needed here is some control of birch scrub at the margins and perhaps selective thinning to encourage succession towards a lightly canopied woodland with Birch, Oak and Scots Pine.

This was the site of archaeological investigations subsequent to the discovery of Lindow Man. The trenches are still present and provide, amongst other things, an accessible soil profile.

**R18: There are excellent opportunities here for landscape interpretation linked to the trenches left by former archaeological investigations.**

## Compartment 3

**R19: We welcome the proposal that this area shall be left largely undisturbed as intermediate heath/bog habitat, but with scrub invasion controlled.**

Care needs to be taken with scrub removal in the ditch separating Compartments 3 and 9 because of the current presence of Royal Fern (*Osmunda regalis*). Newton, in his Flora of Cheshire (Newton, 1971), notes that Royal Fern is now almost totally absent from its former range of habitats in Cheshire (typically Fen margin of Sphagnum bog) and now favours damp sandstone cuttings.

## Compartments 4 & 5

**R20: We support the proposal to restore these compartments to raised bog habitat.**

## Compartments 6a and 6b

**R21: We support the proposal to restore these compartments to raised bog habitat.**

In the north east corner of compartment 6B the peat thins rapidly above a lens of sand which is clearly visible in the drainage ditches. Also visible in the ditches, at this point, are fine examples of fossil pine, rooting in situ into the underlying substrate. Unfortunately, the pine stumps have been smashed by the excavator but even in their damaged state there are good opportunities for both scientific investigation and environmental interpretation.

**R22: The opportunities for landscape interpretation (fossil pine stumps in situ, rooting through humified peat and into the underlying mineral substrate) in the NE corner of Compartment 6B should be incorporated into the Restoration Scheme.**

## Compartment 7

This compartment has recently been subject to a period of aggressive peat extraction. It revealed a magnificent stand of fossil pine which would have fringed the sand island perhaps 5,000 years ago. Tragically, the significance of this for science and environmental education went unrecognised. The pine stumps have largely been destroyed by the excavating machine.

**R23: The recent destruction of a remarkable stand of sub-fossil pine in Compartment 7 provides additional justification for a moratorium on peat extraction whilst the scientific and interpretive potential of the exposed peat horizons is reviewed.**

## Compartment 8

The Restoration Scheme observes (Para 112) that *‘this compartment is substantially unworked at present and is characterised by peat baulks and pits known locally as ‘moss rooms’*. This is fortunate because this compartment includes the findspot of Lindow Man, the first and only Bog Body in Britain to be recovered in an almost intact state and subject to full scientific investigation. Lindow Man is now displayed in the Iron Age gallery of the British Museum. As pointed out above by Rick Turner, there are very few instances in Europe where the precise location of the findspot of an Iron Age bog body is accurately known, and this site deserves to be properly marked and interpreted. The fact that this area is substantially unworked in recent times is fortunate because the context in which Lindow Man was discovered can be easily visualised and interpreted.

**R24: Given the international significance of the discovery of Lindow Man and its great importance to the understanding of this landscape we consider that this compartment should remain substantially unworked. The priorities here should be archaeological conservation and environmental interpretation, with ecological**

**restoration of relevance only inasmuch as it furthers those over-riding objectives. Specialist advice should be sought from English Heritage about how this can best be achieved.**

**R25: Subject to that, we suggest that the findspot of Lindow Man be appropriately marked and interpreted, with a board walk connecting that site to the public footpath, which at this point is little more than 40m away.**

### **Compartment 9**

**R26: We support the restoration of this compartment as a fen with minimum intervention, especially given that this is the centre of Water Vole activity within the site. We suggest that the hydraulic regime is redesigned at this point so as to reduce the need for intervention and to conserve the Water Vole habitat.**

### **Compartment 10**

Compartment 10 lies to the east of Rotherwood Road and has not been worked for at least 40 years. During that time it has become a woodland, principally Birch but with Rowan and Oak above and an understory of Holly below. The ground flora is dominated by Bramble but with Bilberry on the peat baulks. Because of the damp conditions and irregular topography there is a luxuriant bryophyte flora. The woodland provides an excellent example of natural succession on a former peat working surface and as such has great interpretive value. It will contrast nicely with the restored mire habitats to the west of Rotherwood Road.

There is also much dead and decaying wood which favours both invertebrates and birds such as woodpecker. This is ideal breeding habitat for priority bird species such as Willow Tit and Lesser Spotted Woodpecker. The Breeding Bird Survey of Lindow Moss, by Jeff Clark Ecology did include the western fringe of Compartment 10, (see Appendix 11.4 to the application). The report points out that whilst Willow Tit and Lesser Spotted Woodpecker might have been expected, their absence from the survey was hardly surprising as both are 'early nesters'. In fact, because ground conditions are so difficult this block of woodland is virtually impenetrable and little disturbed, so it makes ideal bird breeding habitat in summer and in winter, roost sites for owls. Although Compartment 10 did not appear to be part of the formal ecological survey of Lindow Moss (Appendix 11.1) commissioned by the applicants, Jeff Clarke Ecology made the following comments (Para 7.4):

***'Part of the planned mossland restoration will impact upon the eastern woodland block outwith the boundary of the current extraction area. Here a pioneer birch/oak woodland has become well established and its partial removal will directly impact upon several sensitive species including the red-listed Willow Tit. Careful consideration of the proposed management plans is required to balance these conflicting needs throughout the restoration process.'***

Taking a broader landscape ecological perspective on the wider Lindow Moss landscape, woodland habitat patches such as this are vital as part of the habitat

mosaic. They compensate for woodland losses elsewhere, and this particular woodland provides a very attractive setting for two important and heavily used public rights of way (restricted Byways 34 and 35). Furthermore, unlike the rest of the site, the wet woodland of Compartment 10 is already functioning as an effective carbon sink.

The applicants proposed that this area be retained as woodland but the Pre-Application advice from Cheshire East Council (CEC, Feb 1<sup>st</sup>, 2013) suggested restoration to a 'priority habitat' such as mire/fen/wetland should take preference and that this would ultimately would require 'large scale tree clearance'. The final proposal therefore shows substantial clearance of the woodland, followed by significant engineering works in an attempt to recreate bog habitat, together with the retention of a tokenistic woodland fringe.

**R27: Whilst it would be helpful to maintain a high water table as proposed, we consider that the wet woodland which comprises Compartment 10 should be conserved, and not cleared to make way for an alternative habitat. It provides multifunctional benefits as a wildlife habitat in its own right, a key component in the wider landscape mosaic, a functioning carbon sink and a landscape amenity of great importance, given that it is bounded by two heavily used rights of way. It also contributes strongly to the visual sense of enclosure which is such an attractive feature of the Lindow Moss landscape. It is a first class example of natural succession on an abandoned peat working and has high educational and interpretive potential.**

During the 19<sup>th</sup> Century there was a rifle range on the moss and the 'thousand yard' range ran north/south within and towards the eastern margin of this compartment. Again this presents an interesting opportunity for landscape interpretation.

**R28: We suggest that the line of the former 'thousand yard' rifle range is marked and interpreted where it passes N/S through the woodland of Compartment 10.**

### **Peripheral Habitats & Boundary Treatments**

**R29: We greatly welcome the proposal (Paras 127/128) to retain, encourage and protect the peripheral woodland and scrub which is so important for the setting of Lindow Moss, and suggest that their retention is written in to the terms of reference of the proposed Restoration Committee.**

### **Hydrology**

**R30: We commend the evidence-based assessment in the Environmental Statement and the general approach within the Restoration Scheme. We accept that much of the control of water levels will be engineered within the site but we still feel, as argued above, that there is a case for a properly engineered sluice on the main drain, at or near the outfall to the Sugar Brook, as a final 'set point' for the water level in the system and as a last line of defence if required in times of flood.**

## **Access, Amenity and Interpretation**

**R31: We welcome the proposals to retain existing rights of way and, additionally, to provide two E/W permissive paths, one close to the northern boundary of the site and the other along the main access track through the middle of the working area.**

We understand the reasons for discouraging access via the proposed housing development on the current 'Peat Farm' site but welcome the provision of an access point for organised visits with hard standing for minibuses.

**R32: We are concerned about disabled access to the site as a whole and wonder if this access point might also be appropriate for disabled access?**

Cheshire Wildlife Trust has a small but attractive nature reserve alongside the south central boundary of the site. The combination of bilberry with fringing birch trees means that the site is attractive to the scarce Green Hairstreak butterfly, as well as people. Unless CWT actively wish to deter public access (and that would be a shame) it would be good to provide a linking path from the central access track through the site to the reserve. This would be accessed through the adjoining small mature mixed woodland and perhaps the applicants would consider dedicating that woodland to the Cheshire Wildlife Trust? There is also a need to strengthen woodland planting here (to the east of the woodland) to screen off the proposed housing development on the Peat Farm site.

**R32: There is a need for careful design along the south central boundary of the site to screen off the proposed housing development, accommodate the hard standing for vehicles accessed via the residential development, consider disabled access and to secure continuing public access to the Cheshire Wildlife Trust Nature Reserve.**

## **Management and Aftercare**

We respect the intention of the applicants to retain ownership of the application site and to be responsible for future management operations. The approach set out in the Management and Aftercare Plan seems broadly appropriate.

**R33: We are however concerned that realisation of the restoration objectives may be challenging in practice and the Local Authority may need to build flexibility into any agreement and perhaps avoid linking the achievement of restoration milestones with a prescribed timetable.**

We also welcome the applicants' intention to create so far as possible a 'self-sustaining landscape'. However, experience suggests that in practice a considerable management and maintenance input will be needed in the longer term and this will need to be properly resourced. Moreover, we are concerned that if the site remains in private ownership in the longer term this will inhibit the scope for leveraging in grant

funding from bodies such as Government Agencies, Local Authorities (including Wilmslow Town Council), Heritage Lottery Fund and Charitable Foundations for both ongoing management and site development. That will be necessary to ensure that the site's full visitor potential is realised. Some idea of what is possible may be gained from Natural England's Fenn's and Whixall Mosses National Nature Reserve to the south of Whitchurch.

**R34: In the fullness of time it would be good to see land ownership transferred, and with it responsibility for management, to an appropriate body such as the Cheshire Wildlife Trust. A public statement of intent along these lines by the current owners would, at this stage, do a great deal to establish the confidence and support of the local community.**

The applicants propose that the restoration process should be overseen by a Restoration Committee which is likely to comprise Cheshire East Council, Natural England and the Cheshire Wildlife Trust. Ecological monitoring and technical oversight are important but we are concerned that the Restoration Committee may be preoccupied with a desire to maximise 'priority habitat', to the exclusion of other legitimate interests in a multifunctional landscape.

**R35: We would like to see the Restoration Committee given a broader remit to include: protection of landscape amenity, conservation of palaeoecological and archaeological assets (including sub-fossil pine), promotion of scientific inquiry & education, support for public access and the development of an interpretive strategy. Its membership may need to be broadened to reflect that.**

#### **Assuring the outcome**

We recognise that this proposal is contingent on planning consent for the development of housing on the Peat farm site. We anticipate that will generate the capital necessary to underpin the restoration of Lindow Moss and its after-management, as proposed in this application. A recurring theme in our discussions on the two applications has been concern that the good intentions within the Restoration Scheme may not be realised in practice. Cheshire East Council will have recognised that the Heads of Terms for the Section 106 Agreement need to be very secure. However, we suggest that to assure the outcomes it may also be necessary to establish a bond as can be accepted good practice on Minerals Planning consents.

**R36: We suggest that a Minerals Planning Bond should be secured from the applicants from the proceeds of the benefit of the associated housing development, to be drawn down as the Restoration Scheme proceeds, with a separate commuted sum to secure after-care and ongoing management. We also suggest that any commuted sums generated through the housing development should be directed to Lindow Moss itself and not to general amenity within Wilmslow.**

Prepared by the Planning and Environment Group of Transition Wilmslow and approved by the Transition Wilmslow Steering Group on Feb 18<sup>th</sup>, 2015.

