

Midhope Moors

Moorland Management Plan

UELS/HLS – AG00444068

HLS agreement start date: 1st August 2013
HLS agreement end date: 31st July 2023

Interested parties

Land Owner and HLS agreement holder: Wakefield Farms Ltd (agent & contact Mr Dan Richmond-Watson)

Statutory nature conservation authority and HLS agreement managers:
Natural England, Dark and South West Peak Team, East Midlands Region

Midhope Moors

The Midhope Moors lie on the eastern edge of the Peak District and support a range of characteristic moorland habitats and species. Dry heath dominated by heather occurs on the lower slopes and is replaced by blanket bog on the deeper peat on the higher slopes and the moorland plateau. Several strong springs emerge at the junction of bog and heath – feeding into extensive areas of marshy grassland and flushes which support some regionally scarce plant species including bottle sedge, and provide important habitat for wading birds such as snipe. Extensive tracts of the Midhope moors have been managed as productive grouse moors through rotational burning of heather for more than a century. Much of the moorland plateau is not managed by burning and supports some of the most floristically and structurally diverse blanket bog in the Dark Peak SSSI, with a range of characteristic features and species, for example bog pools, scattered hummocks of bog mosses, cotton-grass and a suite of dwarf shrubs including heather, crowberry, cross-leaved heath and cranberry. This area is particularly important for breeding populations of upland birds including dunlin and golden plover and also supports good numbers of red grouse. Several cloughs dissect the site and these support a range of habitats including springs and flushes, and some small areas of birch and rowan scrub. These are important breeding areas for ring ouzel.

The Howden Moors site of special geological interest is also represented on Midhope Moors, in the area south and east of the Outer Edge trig point. This site is a good example of river capture on peatlands where the channel network shows the very high drainage density typical of stream and river systems over soft, deep peat with channels showing phases of both erosion and deposition.

The inbye fields within the HLS agreement area but outside the SSSI are mainly marshy grasslands, providing important habitat for lapwing, snipe and curlew. One field is managed as a haymeadow, providing potential feeding habitat for twite.

Notable archaeological and historic features at Midhope Moors include Pike Low, a large prehistoric cairn, numerous ancient routeways, post medieval enclosures at Stanny Common and Fenny Common, finds including arrowheads, boundary marker stones and military features including concrete roads, targets, bunkers and spent artillery rounds resulting from the use of the Midhope Moors as military training range during World War II. The Midhope Moors are a popular destination for walking and cycling: the popular Cutgate bridleway crosses the Midhope Moors, linking them to the Upper Derwent Valley further west.

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1. Introduction

This is the Moorland Management Plan referred to in the Guidelines for Farmers and is to be read in conjunction with the UELS/HLS Agreement. The HLS agreement, where moorland options are selected requires a written moorland management plan. Management strongly influences the moor's character, its conservation and cultural interest. The area covered by this plan is shown in Map 1 and the aerial photograph in Map 3.

For land within the Dark Peak SSSI Natural England need to agree management that meets the objectives for the nature conservation interest of the site. Management proposals and any changes to management that are likely to affect the nature conservation interest must be agreed in writing with Natural England before the management can take place.

A plan that details the main management of the moorland is an effective way of fulfilling land manager obligations under the HLS agreement and the SSSI legislation. The plan will provide consent for moorland management, described within, for the lifetime of the plan. The plan also sets out where additional conservation plans are required to deliver capital works programmes. The details of conservation plans will be agreed separately.

The overall purpose of this management plan is to build on the above principles to set out the agreed moorland management that will deliver:

- favourable condition on this part of the SSSI,
- an economic driven grouse shooting and agricultural business;
- conservation of the landscape and cultural heritage within the Peak District National Park

In particular it will:

- briefly describe the nature and conservation importance of the land
- set out the objectives of management to achieve favourable condition in the context of the grouse moor and agricultural business objectives
- identify and set down the agreed management actions to deliver the objectives
- identify any other agreed management which does not conflict with the objectives.

Any variations or amendments to this Plan must be agreed in writing between the parties, signed by all parties and attached to this Plan, and these will thereafter be treated as part of this Plan. This Plan applies to the land described in the HLS Agreement as moorland.

2. Special Interest of the Site (Nature Conservation, Archaeology and Recreation)

2.1 Nature Conservation Importance

2.1.1 Importance of the SSSI (see also SSSI citation)

The Dark Peak SSSI qualifies for the following habitats and species:

Habitats

- Sub-alpine dwarf shrub heath (various vegetation types)
- Blanket bog and valley bog (various vegetation types)
- Short sedge acidic fen, upland
- Tall herb vegetation, upland
- Acid grassland, upland (various vegetation types)
- Species rich bracken
- Upland oak wood (various vegetation types)

Species

- Aggregations of breeding birds - golden plover, merlin, short-eared owl and curlew
- Upland breeding bird assemblage - including- red grouse, curlew
- Invertebrate assemblage: heathland, montane

The main moorland area of the Peak District is known as the Dark Peak. The peatlands of the Dark Peak show a range of mire formations, containing variable proportions of cotton-grasses (*Eriophorum* spp) and dwarf shrubs such as crowberry, heather, and bilberry. A probable result of high levels of atmospheric pollution, wildfires and other management is that the blanket mires of the Dark Peak are poor in bog mosses and other bryophytes sensitive to pollution or disturbance.

Below the watersheds, the vegetation of the lower slopes largely consists of moorland dominated by heather, developed both on blanket peat (>0.5m peat depth) and shallow dry heath soils (<0.5m depth). Midhope Moors, as with other heather moors, have been regularly burnt to provide a supply of nutritious shoots for both red grouse and sheep. Hypnaceous mosses are characteristically absent from the heather communities of the Dark Peak, except in some old stands of heather, particularly on steep cloughs and occasionally in bilberry heath. Cowberry is locally frequent amongst bilberry.

The most common types of mire and flush are dominated by rushes, particularly soft rush, or by common cotton grass, and these typically support star sedge, the bog moss (*Sphagnum fallax*) and the common star-moss; together with a range of other vascular plants such as marsh violet, bog asphodel and marsh pennywort.

The vast blanket mires of the Dark Peak plateaux support nationally important breeding populations of golden plover and dunlin as well as very significant numbers of meadow pipit, the most common passerine throughout the area. On the better draining slopes below the plateaux blanket mire, areas of heath and acid grassland support significant numbers of breeding curlew, red grouse, merlin, short-eared owl and twite. Red grouse are strongly associated with heather-dominated vegetation and are common throughout the area, though their stronghold appears to be towards

the east of the Dark Peak. The heather moors of the Dark Peak provide the breeding habitat for an expanding and nationally important population of merlin. They nest in stands of old leggy heather often near the head of valleys where they can command a view over the surrounding moorland. Although short-eared owls are still a rare breeding bird of the area and the size of the population fluctuates between years, it is probable that there has been an increase in the population and the numbers which have bred in recent years are of national importance. Peregrine, like merlin, have enjoyed a post-pesticide recovery and are increasing in numbers but they still remain a rare breeding bird throughout the Dark Peak. Some cloughs and gritstone edges, with their associated boulder strewn slopes with bracken, support significant populations of ring ouzel.

The woodlands of the Dark Peak support small numbers of woodland and woodland edge birds such as tree pipit, redstart and green woodpecker. Many uncommon plants and insects are restricted to such woods.

Map 2 shows the broad vegetation types that are found across the site, and locations of areas favoured by breeding moorland birds.

2.1.2 Importance of the SAC and SPA

2.2.1 This site qualifies under **Article 4.1** of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:

- Golden Plover *Pluvialis apricaria*, 752 pairs representing at least 3.3% of the breeding population in Great Britain (Count as at 1990)
- Merlin *Falco columbarius*, 77 pairs representing at least 5.9% of the breeding population in Great Britain
- Peregrine* *Falco peregrinus*, 16 pairs representing at least 1.4% of the breeding population in Great Britain
- Short-eared Owl *Asio flammeus*, 25 pairs representing at least 2.5% of the breeding population in Great Britain

This site also qualifies under **Article 4.2** of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species:

- Dunlin* *Calidris alpina schinzii*, 140 pairs representing at least 1.3% of the breeding Baltic/UK/Ireland population

(Nb. * the site has not yet been formally classified for these species)

2.2.2 This site is selected as a Special Area of Conservation for the dry and wet heaths, blanket bogs & mires, and old oak woodlands which are of conservation importance at the European scale.

2.1.3 SSSI/SAC/SPA condition

Table 1 below shows the condition of each monitoring unit as assessed by Natural England. For more detailed site unit comments further information can be obtained from Natural England's website on www.naturalengland.org.uk.

Table 1: SSSI units by habitat condition

SSSI Unit	Feature Interests	Condition Assessment (date)	Comments
88	Blanket bogs Birds Geology	Unfavourable recovering (2009) Favourable for golden plover and dunlin.	Varied blanket bog vegetation with many bog pools. Significant areas of bare peat and gully erosion occur around Bull Clough and the Rhiann Gutter gully systems.
89	Blanket bog Birds Geology	Unfavourable recovering (2009) Favourable for golden plover and dunlin on wet plateau areas	Burning on heather dominated bog is restricted to drier, lower slopes
90	Blanket bog Birds	Unfavourable recovering (2009) Favourable for curlew, golden plover, ring ouzel, SE owl & merlin	Sensitive areas should be protected from burning, including wet areas and areas with bog pools. A greater proportion of heather should be in the mature-degenerate growth phase
91	Dry dwarf shrub heath Flushes Birds	Unfavourable recovering (2009) Favourable Favourable for curlew, ring ouzel, merlin & short-eared owl	Bracken is extensive, control needed. Extensive and species-rich flushes at Stanny Common, and in Mickelden Clough.
92	Dwarf shrub Heath Flushes Birds	Unfavourable recovering (2009) Favourable Favourable for snipe, curlew, short-eared owl, merlin.	Bracken is extensive, control needed. Extensive rush pasture and species rich flushes at Fenny Common Ings

2.2 Archaeology - Scheduled Monuments and SMRs/HERs

The main recorded historic features on Midhope Moors are marked on the HER (part of the FEP). The historic landscape classification of the area shows that on historic maps Midhope Moors were marked as open moorland and enclosed areas, much as it is today. There are several records of finds and historic landmarks on this estate which fall into 5 broad categories:

Prehistoric stone tools and production waste (lithics)

Local finds of lithics are dominated by Mesolithic material with Neolithic and Bronze Age arrowhead types and a single find of a pendant. The locations of these finds are concentrated around the cut gate path and around vantage points (e.g. Pike Lowe).

Cairns cabins and folds

On the summit of the western end of Pike Lowe there is a prominent cairn overlying an earlier barrow with an associated square drystone walled enclosure. The overlying cairn is 6 metres in diameter and stands to 1.3 metres high. This feature is comprised of grit-stone rubble (200-300 mm without soil in interstices). The base of this upper cairn is at the same level as the top of the peat (extrapolated from where peat survives to depth) suggesting a historic period date. Below this loose upper cairn a wider (10m diameter) barrow/cairn has been revealed by the loss of the surrounding peat. Standing to 0.75m high from the exposed mineral soil with peat between the stones this lower feature appears to predate peat formation and to be of later prehistoric date (i.e. Neolithic / Bronze Age).

To the north of these features before the hill top falls away stands a second cairn constructed from loose gritstone rubble. As with the upper cairn it has no peat in the interstices suggesting a historic period date. On the northern side of the cairn a short low section of drystone wall extends out for 1.5 metres perhaps representing the remains of fold, pen or shelter.

Further north on Brown Edge is an isolated drystone structure walled on three sides bounded by a stream on the fourth probably a sheepfold.

On the south western slope of Pike Lowe are the remains of a very small ruined drystone structure, perhaps a shooting butt but given its position probably a shepherd's shelter.

At OS grid 419661 398644 the 1st Edition Ordnance Survey 6" survey of 1855 marks 'Jessie's Cabin in Ruins', this site has not been examined on the ground but the name suggests an 18th / 19th century shooting cabin or shepherds hut.

Old enclosures

Fenny Common Ings and Stanny Ings are curvilinear moorland enclosures of rush pasture (for cattle). Dating of these features is unclear but they predate the earliest mapping in 1825. On the south side of Fenny Common Ings stand the remains of a ruined drystone built structure, built into the enclosure wall. This is the remains of a shepherd's hut or small barn / byre. On the northern side of Fenny Common Ings a group of enclosures appears to represent the extension of these pastures. In 1855 [OS 1st Ed. 6"] Stanny Ings is shown quartered by walls which now only partially survive.

Routeways and boundary markers

The Cut Gate Path is a major route way from at least the medieval period; the name is (Norse influenced) northern English dialect equating to hollow-way (cut-gate). Running west from the Cut Gate on the southern side of Pike Lowe is a braided Holloway. East of Pike Lowe this route meets a north-south route and a south-eastern route - these all appear to be traditional routes onto and across the moors. Two stones are marked on the 1855 Ordnance survey on the line of the boundary with Broomhead Moor. The eastern stone is marked R.R.W. on the southern side (for R. Rimington Wilson) the northern face has a rather cruder capital B inscribed. On the top of the stone is an inscribed cross.

Military features

The visible military remains on the moors appear to date to World War II. They comprise concrete roadways and hard standings. The remains of a brick and concrete ribbed hut / bunker / store survive close to the roadway. Brick and concrete artillery targets survive both on Midhope Moor and to the east on Ewden Height. Various calibre artillery rounds are visible across the moor. The first edition Ordnance Survey 1855 has the place name Range Moor suggesting relatively early use as a firing range.

Once a site is scheduled, consent must be obtained from the Secretary of State for any works that affect it. English Heritage is the body which advises the Government on the suitability of any proposed works to a Scheduled Monument. Land owners/managers are strongly recommended to make preliminary enquiries of their regional English Heritage office when considering any management operations which may affect a scheduled site.

Sites and Monument Records (SMRs) or as they are becoming more commonly known Historic Environment Records (HERs) are databases of all the known archaeological and historical sites and finds within each County. The types of sites recorded can range from individual finds of flint to earthwork sites, and standing structures such as bridges and milestones. These records are usually maintained and enhanced by County Archaeological Services. Often the sites recorded are not of sufficient quality or preservation to be considered of national importance, but they make up the bulk of surviving evidence of past human activity and are a finite and non-renewable resource. For this reason their preservation should be given equal weight to that of nature conservation when management options are being considered.

2.3 Recreation and Access

Midhope Moors are a popular destination for walkers and cyclists. The Cutgate path to Upper Derwent crosses the Moor. Walkers are encouraged to join the path using the path beside Langsett Reservoir. There is some bare peat and erosion along the Cutgate bridleway, and along the North America bridleway which joins it. Midhope Moors are now open access due to the recent implementation of the Countryside Rights of Way Act (2000).

3. Management Aims and Objectives

3.1 Moorland Management Plan Aim

The aim of the plan is to detail agreed management of the site to deliver favourable condition for all interest features, for which the SSSI, SAC and SPA have been designated, that are relevant to this holding, and to promote the objectives of the North Peak HLS, whilst seeking to do this in a way that is consistent with the owner's business and other objectives.

3.1.1 Land owners' interests and objectives:

Management for the production of grouse and sheep with the long term objective of improving the wider conservation and landscape objectives and enhancing game management through active vegetation management, including bracken and other invasive species control, reversal of habitat degradation and legal predator control.

3.2 Conservation Objectives

The overall conservation objectives for the land covered by this plan are to maintain or restore to favourable condition the SSSI/SAC/SPA features for which the land is of special interest and these include:

- To maintain, enhance and where possible restore the diversity of species and habitat structure of the existing moorland;
- Improve the condition and diversity of dwarf shrubs on dry heath, blanket bog and wet heath;
- Maintain and restore the hydrological integrity of the peatland system and other notified wetland features;
- Maintain the existing native broadleaved woodland and enhance, where appropriate, woodland cover e.g. along gills/cloughs;
- Maintain, subject to natural change, breeding bird species numbers and assemblages for which the site has been designated;

These objectives are delivered through the management set out in section 4, table 2 and the maps. This includes the grazing regime (as specified in the HLS agreement) and burning regime (see sections 4.1 to 4.2.4 and Map 1). In addition table 2 specifies in more detail by habitat feature and unit, where it is required, agreed objectives and management actions. Table 2 should be read in conjunction with the maps 1- 4 as well as the management prescriptions section 4.

3.3 Detailed Management Objectives and Actions (see Table 2 below)

3.4 Assessment of Favourable Condition

In order to assess the status of conservation interest and the success of management activities, Natural England will continue the programme of assessment of the condition of the interest features on the land before and during the life time of the plan. The plan area is divided into management units according to habitat types

and or topographical features (see Map1). Within each unit all interest features will normally be monitored as a minimum on a six yearly cycle using the appropriate Common Standard Monitoring Guidance and Methodology tailored if appropriate to the relevant units. The assessment will be discussed with the Land Manager to review progress over the delivery of the management objectives following the assessment. Any potential changes to management will be discussed and agreed with the Land Manager.

Table 2 – Section 3.3 Detailed Management Objectives and Actions – to achieve SSSI/SAC/SPA favourable condition

Habitat and Description	Objectives (refer to Section 3 for more detailed information)	Management required (refer to Section 4 for more detailed information)	Map ref Unit no.
BLANKET BOG			
Heather – cotton-grass bog Deep peat supporting blanket bog vegetation that is structurally and floristically diverse – with a mixture of cotton-grass and heather accompanied by a suite of dwarf shrubs and scattered moss hummocks. This is a breeding area for golden plover and dunlin. Water voles are found in the stream channels in this area. The peat surface is damp and bog pools occur frequently where the water table is high.	<ul style="list-style-type: none"> Enhance moss layer Reduce erosion of peat from the sides of gullies, particularly around Bull Clough. Maintain and enhance golden plover, dunlin and curlew habitat by maintaining high water table and mosaic of short (<5cm) and medium height vegetation (10-30cm) Maintain habitat for water voles by maintaining high water table and dense vegetation cover. 	<ul style="list-style-type: none"> No burning for the lifetime of the plan. Re-vegetate areas of eroding peat outside the geological SSSI site (Map 1) using restoration techniques (subject to written agreement with Natural England). Maintain high water table by gully blocking work where appropriate outside the geological SSSI site (subject to written agreement with Natural England) Continue light summer grazing 	<p>Map 1</p> <p>88 89 90</p> <p>Map 4</p> <p>88 89</p>
Cotton-grass bog Deep peat supporting vegetation dominated by hare's tail cotton-grass (<i>Eriophorum vaginatum</i>) with scattered dwarf shrubs.	<ul style="list-style-type: none"> Enhance the cover and diversity of dwarf shrubs Enhance moss layer Maintain and enhance golden plover, dunlin and curlew habitat by maintaining high water table and mosaic of short (<5cm) and medium 	<ul style="list-style-type: none"> Maintain no burning Continue light summer grazing Maintain high water table by gully blocking work where appropriate outside the geological SSSI site (subject to written agreement with 	<p>Map 1</p> <p>88</p> <p>Map 4</p>

Habitat and Description	Objectives (refer to Section 3 for more detailed information)	Management required (refer to Section 4 for more detailed information)	Map ref Unit no.
	height vegetation (10-30cm)	Natural England)	
<p>Heather dominated bog</p> <p>Blanket bog (deep peat) dominated by heather (<i>Calluna vulgaris</i>). Peat surface often dry. Poorly developed moss layer.</p>	<ul style="list-style-type: none"> • Maintain and enhance the species diversity and cover of dwarf shrubs • Protect the existing moss and litter layer, do not expose bare peat. • Maintain age structure mosaic for breeding birds, e.g. Red grouse, curlew, typically 1:3 ratio of short <5cm to long 25-100cm vegetation, in a mosaic, within breeding areas • Maintain nesting sites for merlin and short-eared owl with stands of 30 - 100cm tall late mature / degenerate heather (at least 10% of heather within the burning rotation) distributed evenly across the area • Reduce erosion of peat from the sides of gullies. 	<p>Burn appropriate vegetation below 480m asl (see section 4) in a rotation of 23 years, with no area burnt more frequently than once every 18 years, to create a mosaic of vegetation structure across the site, including heather in the mature and degenerate growth phases. The maximum area of vegetation to be burnt in the 5 year consent period will be 47.5 hectares. This equates to an average annual total of 9.5 hectares (based on an average rotation of 23 years). The amount burnt each year can be varied above (by up to 20%) and below this average as long as the total hectareage consented over the 5 year period is not exceeded.</p> <p>All burning and cutting must conform to the standards specified on Map 1 and in section 4</p> <p>No burning in sensitive areas – see section 4 and map1, maintain no burn buffers of 5-10m around sensitive areas.</p> <p>The amount of burning each year will be estimated by the Moorland Manager</p>	<p>Map 1</p> <p>89 90</p> <p>Map 1</p>

Habitat and Description	Objectives (refer to Section 3 for more detailed information)	Management required (refer to Section 4 for more detailed information) and reported to Natural England. Good record keeping including the use of GPS data is recommended.	Map ref Unit no.
Eroding blanket bog around Pike Low. Peat of very variable depth due to past fire and erosion. Several areas of bare peat.		<ul style="list-style-type: none"> • There will be no intensification of current burning on this habitat. • Undertake restoration programme to reduce gully erosion and re-vegetate bare peat areas – details to be agreed with Natural England • Continue light summer grazing 	92
DRY HEATH		Burn small patches of heather dominated vegetation to break up large stands of heather and create a more varied structure. <ul style="list-style-type: none"> • Undertake restoration programme to re-vegetate bare peat areas – details to be agreed with Natural England 	
Heather dominated dry heath Areas of thin peat (less than 0.5m) dominated by <i>Calluna vulgaris</i> , with locally abundant bilberry, cowberry, crowberry and bell heather.	<ul style="list-style-type: none"> • Maintain and enhance the diversity and cover of dwarf shrubs • Protect the existing moss and litter layer 	Burn appropriate vegetation in a rotation of 9-15 years (or longer) to create a mosaic of vegetation structure across the site, including heather in the mature and degenerate phases of growth. The	Map 1

Habitat and Description	Objectives (refer to Section 3 for more detailed information)	Management required (refer to Section 4 for more detailed information)	Map ref Unit no.
	<ul style="list-style-type: none"> Maintain and enhance age structure mosaic for breeding birds, e.g. Red grouse, curlew, ring ouzel, merlin, short-eared owl. Allow a greater proportion (at least 10%) of heather within the burning rotation to reach the late mature / degenerate phase 	<p>maximum area of vegetation to be burnt in the 5 year consent period will be 130 hectares (which equates to 8% of the total area per year). This equates to an average annual total of 26 hectares. The amount burnt each year can be varied above (by up to 20%) and below this average as long as the total hectareage consented over the 5 year period is not exceeded.</p> <p>All burning and cutting must conform to the standards specified on Map 2 and in section 4</p> <p>No burning in sensitive areas - see section 4 and map 1, maintain no burn buffers of 5-10m around sensitive areas.</p> <ul style="list-style-type: none"> There should be no intensification of current burning on this habitat. <p>Monitor leading edge of bracken beds invading heather dominated heath, and treat as necessary</p> <ul style="list-style-type: none"> Continue light grazing in areas outside the HLS enclosure. Maintain at least 10% of the heather without disturbance by burning (cloughs and the tops of cloughs are included in this 10%), i.e. take at least 10% of the area of dry heath out of the 	<p>91 92</p> <p>Map 1</p>

Habitat and Description	Objectives (refer to Section 3 for more detailed information)	Management required (refer to Section 4 for more detailed information)	Map ref Unit no.
<p>Non-heather dominated dwarf shrub heath</p> <p>Areas of thin peat (<50cm deep) dominated by bilberry, with locally abundant crowberry and cowberry. The areas are most frequently found on steep slopes on the sides of cloughs.</p>	<ul style="list-style-type: none"> Maintain and enhance the diversity and cover of dwarf shrubs – the berries are particularly important as a food source for ring ouzel. Protect the existing moss and litter layer. 	<p>burning rotation.</p> <ul style="list-style-type: none"> No burning. These areas are marked on Map 1 as areas not included in the burning rotation (together with bracken, acid grassland, marshy grassland, bare ground). 	<p>Map 1</p> <p>91 92 89</p>
CLOUGHS			
<p>This section refers to all cloughs and major gullies across the site. (These may not all be shown on map 1a).</p>	<ul style="list-style-type: none"> Retain tree cover / birch rowan scrub in cloughs. Avoid erosion of clough sides Provide potential nesting sites on clough tops for merlin and short-eared owl. Retain mature-degenerate heather and other dwarf shrubs, particularly bilberry, on clough sides and on the tops of cloughs. 	<ul style="list-style-type: none"> Do not burn the tops or banks of cloughs or gullies Leave a 5-10m buffer of mature-degenerate heather on the tops of cloughs Do not spray bracken on clough sides where there is a risk of resulting erosion – obtain written agreement for bracken control proposals with Natural England and the Environment Agency in advance (see bracken section and Map 4b). 	<p>Map 1 Map 4</p>
<p>Mickleden Clough</p>	<ul style="list-style-type: none"> Maintain and enhance habitat for merlin and short-eared owl 	<ul style="list-style-type: none"> No burns on steep clough sides Retain bracken beds on clough sides but control any spread into dwarf 	<p>91</p>

Habitat and Description	Objectives (refer to Section 3 for more detailed information)	Management required (refer to Section 4 for more detailed information)	Map ref Unit no.
Sugden Clough	<ul style="list-style-type: none"> Reduce erosion 	<ul style="list-style-type: none"> shrub heath at the break of slope Retain areas of scrub 	
Shaw Clough Sugden Clough Fenny Common Brook Thickwoods Clough	<ul style="list-style-type: none"> Reduce erosion Maintain and enhance habitat for ring ouzel and whinchat 	<ul style="list-style-type: none"> 5-10m no-burn buffer around clough Retain bracken beds Continue light grazing 	90 92
Bull Clough	<ul style="list-style-type: none"> Reduce erosion Re-vegetation of bare peat areas 	<ul style="list-style-type: none"> Leave a 10m no burn buffer around clough and bare peat areas 	89
MIRE GRASSLAND AND ACID FLUSHES			
Stanny Common Ings Fenny Common Ings: Extensive areas of species-rich acid flushes surrounded by rush pasture Areas of soft rush and common cotton grass with abundant bog moss <i>Sphagnum</i> ground layer (usually <i>Sphagnum fallax</i>)	<ul style="list-style-type: none"> Maintain the flora and fauna associated with rush-dominated swards and flushes. Maintain feeding areas for waders and short-eared owl Retain high water tables Maintain habitat for snipe (>80% vegetation tall, 20-100cm, over wet ground) 	<ul style="list-style-type: none"> Do not burn into flushes, leave a 10m buffer unburned Continue light grazing Consider fencing / wall-restoration at Fenny Common Ings to allow summer only grazing. 	Maps 1, 4 90, 91, 92 and localised areas too small to map across whole site
BRACKEN			
Bracken is extensive within these units. There are numerous bracken beds and	<ul style="list-style-type: none"> Retain dense bracken beds for birds. Retain dense and scattered bracken beds around Stanny Common. Map 	<ul style="list-style-type: none"> Retain all dense bracken beds but control vigorous invading fronts when over dense dwarf-shrub vegetation. 	Map4 91 92

Habitat and Description	Objectives (refer to Section 3 for more detailed information)	Management required (refer to Section 4 for more detailed information)	Map ref Unit no.
<p>also large scattered bracken beds where the bracken occurs with a healthy understorey of dwarf shrubs. There has been extensive bracken treatment in the mid 1990s.</p>	<p>1b</p> <ul style="list-style-type: none"> Treat bracken invading dwarf-shrub heath from dense beds. Re-vegetation of enclosed treated areas where there is no dwarf shrub understorey 	<ul style="list-style-type: none"> Use heather brash cut on site to spread on areas of bare peat as follow-up to bracken treatment in fenced enclosures at Fenny Common (refer to section 4.3 for cutting specification) <p>Agree all additional bracken control proposals (i.e. not shown on map 4b) in writing with Natural England and the Environment Agency in advance</p>	
WOODLAND AND SCRUB			
<p>Birch and rowan scrub invading area of accidental burn on the edge of the moorland</p>	<ul style="list-style-type: none"> Retain as scattered trees and scrub for merlin 	<ul style="list-style-type: none"> Monitor spread of scrub from northern boundary towards Fenny Hole 	91
GEOLOGY			
<p>The channel network in this area represents a good example of river capture on peatlands showing the very high drainage density typical of stream and river systems over soft, deep peat. Channels show phases of both erosion and deposition.</p>	<ul style="list-style-type: none"> Allow natural and spontaneous geological processes to continue. 	<ul style="list-style-type: none"> Maintain no burning regime. Do not block gullies within the geological site. 	88 / 89 Map 1

4. Management Prescriptions

The Land Manager will manage the Land as follows:

4.1 Burning: Land within the Burning Rotation

Map 2 shows areas of heather moorland that will be managed by rotational burning.

NB. Areas of the moor with no or low dwarf heath shrub cover are considered to be outside the burning rotation, including most land dominated by bracken or rush and areas of grassland. These areas are shown on Map 2.

4.1.1 Dry heath

Areas of dry heath vegetation totalling 310 hectares as shown on Map 1 will be burnt on a rotation of 9-15 years (or longer). The maximum area of dry heath vegetation to be burnt in the five year consent period will be **130 hectares**. No area of **dry heath** will be burned on a rotation of less than 8 years.

This equates to the average annual total of **26 hectares** (calculated on an average rotation of 12 years). The amount burnt each year can be varied above and below this average as long as the total hectarage consented over the three year consent period is not exceeded. Record keeping is vital for the implementation of this programme.

In areas known to be used by ground nesting birds of prey, or that hold particular vegetation features, an appropriate longer rotation may be desirable to maintain suitable nesting or habitat conditions. In these cases the rotation and locations will be agreed and described.

4.1.2 Blanket Bog

There is particular concern to see only very careful burning on areas of blanket bog (that is, vegetation that generally covers deeper peat) to avoid damaging the peat resource as well as for maintaining or restoring the delicate surface vegetation. In many areas burning of blanket bog is either not needed or is not desirable for nature conservation and/or wider land management purposes. Where heather is currently dominant on blanket bog, burning management may still be appropriate as part of a conservation management/restoration plan. Potential situations might include preventing moorland fires or “freshening up” old, wind checked heather, however this plan does not give consent for such management, separate notice and consent is required. Where burning takes place it will always be important to ensure that the peat resource and any sensitive vegetation are not damaged.

Blanket Bog

Areas of heather dominated blanket bog shown in blue on Map 1 (200 hectares) will normally be burnt on a rotation of 23 years. The maximum area of this blanket bog

vegetation to be burnt in the five year consent period will be **47.5 hectares**. No area will be burned on a rotation of less than 18 years.

This equates to the average annual total of **9.5 hectares** (calculated on an average rotation of 23 years). The amount burnt each year can be varied above and below this average as long as the total hectarage consented over the five year consent period is not exceeded.

Pike Low

The area of blanket bog shown in pink on Map 2 (Pike Low 15 ha) includes eroding moorland and bare peat areas. Bare peat areas are readily identifiable both on the ground and on aerial photographs and have been mapped as no burn sensitive features. Eroding moorland comprises uneven ground with heather dominated vegetation broken up with hags and small patches of bare peat.

The land manager will ensure that only areas of vegetation on unbroken ground will be burnt and care will be taken to avoid burns spreading into hagged areas and bare peat. The blanket bog will normally be burnt on a rotation of 23years. Areas around Pike Low that conform to the robust character capable of withstanding burning management are included in the total for blanket bog habitat.

Natural England will review with the Land Manager the appropriateness of the burning rotations throughout the period of the Moorland Management Plan and agree amendments based on practical experience if appropriate.

4.1.3 It is agreed that for each burn the following will be adhered to:

- Burning will only take place in areas where the heather cover reaches **50% or more** in the proposed burn area and where the heather is predominantly **not less than 30cm/1ft* in height on average and where burning is consistent with the agreed rotation (unless agreed as part of a restoration or recovery plan)**. Measuring heather/vegetation height = done by placing a measuring stick down into the vegetation (not by stretching heather plants out). The exception to this is the area 50m in front of and 50m behind shooting butts where heather dominated vegetation can be burned more frequently, in small patches, to maintain a high proportion of short heather to assist with pick-up of shot grouse. The burning practice in these areas must comply with all other prescriptions.
- Burn size will be managed with the objective of restricting individual burns to ideally less than 30 metres wide, however the maximum width will be 55 metres. The maximum area of each burn will be no more than two hectares on dry heath and no more than one hectare on blanket bog.
- Sometimes catch-up burns are desired by moorland managers where there has not been much burning for a number of years. Any proposals for catch-up burning outside the consented burning hectarage will be considered. Any such proposals because they are not part of this Agreement will need separate consent from Natural England.

- Burning will only be carried out when conditions allow for quick cool burns. A cool burn is one which removes the dwarf-shrub canopy yet leaves behind a proportion of 'stick' and does not cause damage to the moss layer or expose the peat surface. [Hotter, slower burns can kill the moss and lichen layer and plants like cowberry and bilberry and if severe it can burn into the peat surface causing erosion and affecting the integrity of the sensitive habitat.] Any moss or lichen or litter layer should not be damaged by burning. When conditions do not allow for this, fires will not be started.
- Burning is only allowed between 1 October and 15 April. Caution should be followed during periods of dry weather and burning should not be undertaken even within this period where bird nesting activity has been noted in proposed burn areas.
- Any accidental burns by keepers or sub-contractors will count towards the total amount consented over the five year consent period. If arson results in the total being exceeded early, then the management plan will be reviewed with Natural England, but it is accepted that the moor should continue to be burnt in rotation.
- Heather and Grass etc. Regulations 2007 (as amended) 'Heather and Grass Burning Code'. All burning will follow the Regulations and should be in accordance with the Code (and any future revisions thereof) unless otherwise specified within this management plan. The Heather and Grass Burning Code and Regulations can be found on the Defra website www.defra.gov.uk.
- Sufficient personnel and equipment will be available to control burning for example to extinguish any fires that prove to be too hot or that are in danger of getting out of control. Ideally there should be a bowser/sprayer available or a suitable all-terrain vehicle where possible and radio contact between keepers.
- Within known bird of prey nesting zones blocks of taller heather should be retained.
- The Land Manager will inform Natural England as soon as possible and within a week of any accidental or arson burns that do not follow the practices listed above.
- The Land Manager or employees will regularly review with Natural England heather growth rates, using local knowledge and all available information eg aerial photography. This will inform joint understanding and assessment of burning rotations and facilitate future planning.

4.2 Land outside the Burning Rotation

4.2.1 Areas not to be burnt

To achieve favourable condition and sustainable moorland management the following types of land will normally be excluded from the burning rotation (there may be circumstances where carefully controlled burning in an area usually outside the burning rotation may be appropriate for one or more good management reasons, including delivery of SSSI favourable condition (eg to prevent conversion of heath to woodland). Where these circumstances can be predicted, agreed and adequately described they will be included in the Agreement. Otherwise any proposals will be the subject of separate consultation and consent). The following categories are considered:

- Areas sensitive to disturbance and damage by fire, 'Sensitive Areas'.
- Areas of heath, which it is agreed, should not be burnt
- Other areas not to be burnt (eg grassland, wetland habitats).
- Areas where it is agreed there should be no burning on a temporary basis.

There will be no burning on 'sensitive' and other areas mapped in Map 2 and described below.

4.2.2 Sensitive Areas:

The 'sensitive' areas have been mapped based on definitions below and in discussion with the Land Manager. As other important 'sensitive' areas are located these will be discussed between Natural England and the estate and agreed areas will be added to map 2. However, it is unlikely that it will be possible to map all 'sensitive' areas. Where they are encountered but are unmapped every effort will be made to avoid burning into them. 'Sensitive' areas include:

- Flushes and mires including areas around springs, pools, wet hollows and those rich in bog mosses with abundant and or almost continuous cover of Sphagnum species, other mosses, liverworts and or lichens, where burning is likely to damage the interest. Such areas contain species which are sensitive to burning and often occur only at a small scale.
- Haggs, erosion gullies and areas of bare peat.
- Land, normally around and above 600 metres, where burning is likely to damage slow-growing vegetation and vulnerable habitats
- Areas with native trees or shrubs or immediately adjacent to planting enclosures.
- Areas where soils are less than 5 centimetres deep or ground made up of scree or where there is high incidence of exposed rock.
- Areas with a noticeably uneven structure. In heathland this unevenness is most commonly found in very old heather stands, often comprising large and spreading dwarf shrub bushes. The dwarf shrub canopy will not be

completely continuous and some of its upper surface may be twice as high as other parts. In blanket bog unevenness can also be characterised by Sphagnum hummocks, lawns and hollows or mixtures of well-developed cotton-grass tussocks and spreading bushes of dwarf shrubs.

- There should be no burning within 5 metres either side of a watercourse, from the edge of the watercourse where the following apply:
 - There is a well developed bankside structure/cover of burning sensitive vegetation not burnt within recent rotations or because of its sensitivity should not be burnt;
 - There is, or there is a risk of, bankside erosion and/or the loss of eroded material e.g. peat from across the moor via the watercourse pathway (including active grips or gullies);
- Steep slopes and gullies greater than 1 in 3 on blanket bog and 1 in 2 on dry heath unless otherwise agreed between the land managers and Natural England. Natural England will discuss with the land managers a variation from the no burn approach in experimental areas to help prevent arson fires. This will be subject to separate consultation and consent.
- Areas of heather moorland and bog, as agreed between Natural England and the Land Manager as not obviously recently burnt, so as to conserve fire-sensitive species that might be lost by a resumption of burning.
- Areas in which rare, fire-sensitive species occur.

4.2.3 Other areas not to be burnt:

- Bracken-dominated areas - no burning within 15 metres of bracken-dominated areas, or within 5 metres of the last fronds ahead of a leading edge, unless as part of an agreed bracken management programme.
- Areas of grassland and rush dominated areas.
- Areas of blanket bog not dominated by heather (e.g. areas dominated by cotton grass, crowberry, bilberry etc)

4.2.4 Areas outside the Burning Rotation on Temporary Basis:

These will be reviewed between land managers and Natural England and brought back into the burning rotation at an appropriate time. Separate SSSI consent for any agreed areas will be required. Examples include:

- Areas of bare peat and eroding moorland
- Bracken dominated areas where treatment is agreed and consented
- Areas damaged by burns

4.3 Cutting

Cutting has been used to create fire breaks and occasionally for heather management (in place of burning) on heather dominated dry heath and on some areas of blanket bog, particularly around the butts along Sugden Clough. Brash harvested during cutting should be used in revegetation of bare peat and eroding areas, the areas where brash is cut and collected will be exempt from the calculation of the total area for heather management for either dry heath or blanket bog up to a maximum area of 2 hectares (individual areas to be recorded). The use of vehicles on blanket bog areas for the purpose of cutting heather or collecting heather seed will be agreed separately with Natural England.

Other than as stated above, for the purpose of restoration, where cutting is carried out the area cut contributes towards the total area under heather management (including the area burnt) that is specified above i.e. it replaces burning in the burning rotation. Specific areas will be agreed between land managers and Natural England as required to ensure the overall annual burning programme on the moor is not compromised.

Cutting will conform to the guidelines specified below.

General Prescriptions for cutting

The following apply to all cutting carried out:

- Cutting will only be carried out during the burning season, from 1st October to 15th April. Baling will not occur during the main bird-nesting season – from 1st April to 31st July. Cutting should not be undertaken, in any case, where birds are seen to start nesting.
- Cutting to generate brash for moorland restoration works should be done during the autumn (mid-October to the end of November) when the seed is ripe and before the peat becomes too wet.
- In the areas cut at least 10% of heather in the late mature / degenerate stage will be retained.
- Heather will be cut when it is at least 30cm in height (building – mature phase). Avoid cutting large areas of old heather because regeneration is unlikely to be very successful.
- The cut will leave 10cm of heather stem above the ground. Cuts will be at least 10 metres wide (to act as effective firebreaks) and up to a maximum of 30 metres in width covering about 0.5 – 1.0ha. If long cuts are made, the edges should be wavy to blend in with the landscape and contours.
- No cutting will occur when the ground is saturated, as this can damage the peat surface.
- All sensitive areas listed above will be avoided including wet areas and bogs, which are sensitive to disturbance and important for wildlife. Avoid steep and rocky ground, and check the area for large stones as these can damage cutting equipment.

- A low ground pressure vehicle will be used, to reduce compaction and damage to the peat, disturbance to the surface and risk of bogging down. There must be no damage to the peat surface and rocks and no persistent tracks.
- Cut material will not normally be left on the moorland as this prevents regeneration and is a fire hazard. It can be baled or gathered and removed. Alternatively a double-chop forage harvester can be used, which chops the material finely and allows it to be incorporated into the soil quite rapidly.
- Bales, bags or heaps of cut heather will not be stored on the moorland, as this kills the underlying vegetation.

4.4 Drainage

Hydrological integrity of moorland habitats is an important part of sustainable moorland management. It is therefore agreed that there will be no new drainage works or gripping carried out on the Land.

The maintenance of drains along walls or established tracks (surfaced tracks where drains currently exist) can be maintained but not deepened, widened or improved (tracks used by 4x4 vehicles are marked on map 5). Outside these areas other maintenance will be considered with Natural England if such maintenance is covered by the 'Operations Likely to Damage' or it is otherwise agreed to do so.

Artificial (e.g. grips) and other man-induced (e.g. erosion gullies) drainage across areas of moorland and in particular blanket bog can lead to significant changes in the hydrology, morphology and ecology of the habitat.

During the course of this agreement the Land Manager and Natural England will identify the potential to ameliorate/prevent erosion in gullies and agree a programme of works including the funding package.

4.5 Moorland Restoration

Heather on the area north of Sugden Clough could be cut, rather than burned, to produce a supply of heather brash for regeneration of dwarf shrubs in the bracken enclosures on Fenny Common, on eroding peat around Pike Low, and on the areas damaged by vehicles alongside the butts on Sugden Clough, and over Lost Lad. Cutting for restoration brash should be done in the autumn (mid – October to the end of November) when the seed is ripe and before the peat becomes too wet. The cuttings should be removed and used as brash as a seed source for regeneration work (this will require material to be finely chopped e.g. using a double chop forage harvester, or it may be baled as cut heather). Where cutting for brash is carried out the area cut contributes towards the annual average and total area burnt that is specified in section 4.1, i.e. it replaces burning in the burning rotation. Heather must not be cut when the ground is saturated as this can damage the peat surface. Cutting will conform to the guidelines specified in section 4.3.

4.6 Vehicles

Vehicles will not cross the ‘sensitive areas’ as highlighted on Map 2. Outside these areas the use of vehicles must not result in rutting or damage to the surface vegetation and special care should be taken to avoid wet and boggy areas. The use of wheeled or tracked vehicles in connection with grouse moor management will be largely restricted to the mapped tracks or the public bridleway as shown on Map 5, although low ground pressure vehicles like argocats are likely to be used more widely (eg for direct dosing), but only in conditions and places where their use will not cause rutting.

During the bird breeding season 1 April to 31 July vehicles used off established routes and tracks will be kept to a minimum to avoid bird disturbance and damage to nest sites. Where it is current practice not to use vehicles during the bird breeding season this will continue.

4.7 Tracks

Natural England appreciate that tracks may sometimes be necessary to facilitate management on grouse moors including both shooting and grazing management and that they can therefore be required in some situations to achieve or maintain appropriate management.

Existing tracks are shown on map 5. Routine maintenance of existing tracks is permitted under this plan provided:

- repairs to track surfaces use the same materials and methods as the existing surface
- tracks are not widened or lengthened
- drains and drainage channels are not widened or deepened
- all machinery used complies with requirements of section 4.6 (Vehicles) above

The improvement or upgrading of existing tracks will require separate consultation and consent from Natural England.

Proposals for new tracks will be assessed by examining the effects on the interest features of the SSSI/SAC/SPA and will be agreed if they do not impact significantly on the interest features or affect site integrity.

4.8 Grazing

Grazing will be in accordance with the terms of the HLS agreement. The HLS tiers and requirements are summarised in Table 3 below.

Table 3 Summary of North Peak HLS

Unit(s)	Area (ha)	Tier	Sheep numbers and timing
88, 89, 90, pt91, pt 92	948.32	2A Moorland	412 ewes & hogs during summer (1 March – 30

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			September) 309 ewes & hoggs during winter (1 October – 28 February)
pt91 & pt 92 Stanny Common Ings and Fenny Common Ings	26.47	1B Enclosed Rough Grazing	These enclosures are used for lambing (April – mid-May) and tupping mid-November for 6 weeks. Moorland sheep have access to these areas between 30 Nov and 30 March.

There will be no supplementary feeding on the moorland vegetation.

4.9 Fertilisers (organic and inorganic)

The application and storage of manure, fertilisers or lime is not permitted on the Land except as part of a restoration plan.

4.10 Pesticides, Herbicides, Insecticides and Fungicides

It is agreed that pesticides, herbicides, insecticides and fungicides will not generally be used on the land. The exceptions are:

- The landowner may control bracken in agreement with and subject to consent from Natural England. Natural England may undertake control of bracken for nature conservation purposes subject to permission from the landowner and under a separate capital works agreement. This will be undertaken in accordance with a bracken control plan to be agreed between all parties.

4.11 Pest Control

The lawful control of all legitimate 'pest' species may be carried out e.g. fox, carrion crow, stoat, magpie, mink, rabbit and weasel.

4.12 Shooting and Sporting

There is no constraint in the plan upon the landowner's rights and privileges to lawful game sport on the land.

The Land Manager may cut bilberry and heather turfs from non-eroding landscapes for the routine maintenance of existing grouse butts.

The Land Manager may use natural quartz grit and medicated grit and undertake direct dosing of grouse.

No animals or plants will be introduced onto the land within the SSSI without the written consent of Natural England

4.13 Trees, hedges, bushes, banks, walls and fences

Scrub and trees in cloughs will be retained as part of the moorland vegetation mosaic vital for birds. The spread of birch scrub in site unit 91, near the northern boundary will be monitored.

There may be scope to undertake native tree/shrub planting, eg in areas of dense bracken and/or steep slopes and gullies. This may provide an important woodland habitat for upland birds such as black grouse. Any future tree planting will need to be agreed with Natural England.

The landowner will be responsible for the maintenance of any trees, hedges, bushes, banks, wall and fences or other boundaries that fall within the landowner's liability on the Agreement Land.

4.13 Archaeological and historical sites management

There are a number of moorland management practices which may have an impact on archaeological remains:

Burning

Quick, cool burns which remove the dwarf shrub canopy but do not affect the moss layer or expose the peat surface, are usually acceptable on moorland where archaeological features are present. Hotter, slower burns which burn into the peat surface are not acceptable however, as the resulting removal of vegetation can result in erosion. Damage can also be caused to underlying archaeological sediments in these conditions, as well as to upstanding features such as stone structures. English Heritage should always be notified of proposals to burn across Scheduled Monuments.

Flailing/Cutting

Heather cutting using a mower may result in damage to archaeological features, particularly where earthworks occur. In these circumstances it can be difficult to cut vegetation evenly and archaeological features may suffer scoring or erosion if mowing machinery is set at a very low level. Generally, cutting should be avoided across known areas of archaeological interest where above ground features are extensive. In these circumstances it may be possible for safe routes for vehicles to be identified by qualified archaeologists however, and it is recommended that the PDNPA Cultural Heritage Team be contacted for advice in advance of works on such areas. Flaying to break up undesirable moorland vegetation cover such as *Molina* should be avoided in areas of known archaeological remains, particularly where upstanding stone structures occur. In these circumstances it may be possible for safe routes for vehicles to be identified by qualified archaeologists however, and it is recommended that the PDNPA Cultural Heritage Team be contacted for advice in advance of works on such areas.

Bracken Control

Hand and aerial spraying of bracken would normally be acceptable in areas of known archaeological features. The removal of bracken cover from steep slopes where archaeological features are present should be avoided though, as this may result in erosion.

Use of Vehicles

The use of vehicles across archaeological sites should be carefully assessed against the fragility of the known or suspected remains. In some circumstances it may be possible for safe routes for vehicles to be identified by qualified archaeologists and it is recommended that the PDNPA Cultural Heritage Team be contacted for advice in advance of works on such areas.

Traditional Boundary Features

Where drystone wall boundaries are to be restored or repaired all existing wall furniture, such as sheep throughs, stiles, gate posts and water troughs should be retained.

5. Review

It is open for any party to suggest changes or additions to the plan at any time during its life.

Compliance with the terms of the plan is a condition of consent afforded to operations included and agreed within the plan. Any reckless or intentional disturbance or damage to the interest of the site will be considered in accordance with the Natural England Enforcement Policy (available on request).

6. Further Consultation

Where operations not covered by the plan are proposed; amendments to the plan are to be made; or where it is indicated in the plan that further detail is to be agreed with Natural England, the relevant consultations must be made by the land owner/manager and consents obtained prior to any work taking place.

For operations included in the "Operations Likely to Damage the Special Interest" of the Dark Peak SSSI supplied as part of the notification, consent under Section 28E of the Wildlife and Countryside Act 1981 (as amended) must be obtained from Natural England.

Natural England having due regard to National Park purposes will consult the Peak District National Park Authority (via the Countryside & Economy Service), where relevant, on any proposals that are new to the plan or are amendments to the plan or that include details that are in addition to those already included in the plan.

Where it is a statutory requirement to obtain any other permissions or consents the relevant authorities will be consulted by the appropriate signatory to the plan e.g. authorisation by the Environment Agency for bracken spraying.