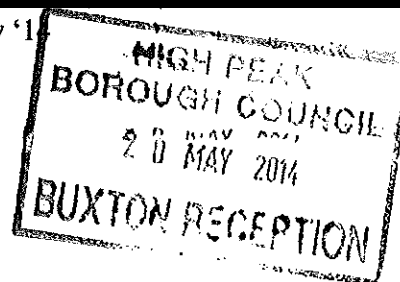


High Peak Borough Council,  
Development Control Team,  
Planning Applications Dept.,  
High Peak Borough Council,  
Buxton Town Hall,  
Market Place,  
Buxton SK17 6EL.  
jane.colley@highpeak.gov.uk

20<sup>th</sup> May '14



F.A.O. Jane Colley Senior Planning Officer

Re: Additional Objections to Planning Application HPK/2014/0119 Linglongs Rd. -land south of  
Macclesfield Road, Whaley Bridge.

I wish to include the objections below in my original objections of 25<sup>th</sup> April and additional of 29<sup>th</sup>.April. I would be obliged if you could attach them.

**I Additionally Object** to Planning Application HPK/2014/0119 as a resident of Whaley Bridge on the following grounds:

**1.I object to the Planning Application** as the site is part of the Local Peak District Biodiversity Action Plan for Rush Pasture (LBAP Rush Pasture)

ref: [www.peakdistrict.gov.uk/\\_\\_data/assets/pdf\\_file/0006/.../bap6\\_2\\_rp.pdf](http://www.peakdistrict.gov.uk/__data/assets/pdf_file/0006/.../bap6_2_rp.pdf)

Additionally

[www.peakdistrict.gov.uk/\\_\\_data/.../purple-moor-grass-rush-pasture.pdf](http://www.peakdistrict.gov.uk/__data/.../purple-moor-grass-rush-pasture.pdf)

Juncus Effusus along with a wide variety of flora and fauna have been identified extensively on all the Gladman Planning Application fields. I've copied the more relevant sections but I do not exclude other sections from my objection. More specifically the LBAP (Rush Pasture) states:

***"Designated Sites***

*'Rush pasture within enclosed fields forms part of the reason for notification of the Goyt Valley and Leek Moors SSSIs.'*

***'A Vision for the Peak District***

*The objectives and targets outlined below have been chosen to reflect:*

- i) The importance of the rush pasture habitat for internationally, nationally and regionally important bird, invertebrate and plant species,*
- ii) The contribution that rush pasture makes to the moorland/farmland interface and to the landscapes of the South West Peak and Dark Peak Natural Areas,*
- iii) The presence of two ESAs within the BAP area which should be able to make a significant impact on the conservation and enhancement of the rush pasture habitat. Rush pastures form a distinctive habitat with tussocky and unruly appearance and reflect decades of hard toil by farmers, struggling to farm marginal and difficult land. They now provide an essential habitat for many important birds, plants and invertebrates. The targets are very ambitious but with resources and targeted effort they can be achieved. The realisation of the actions will ensure that these rough marginal fields remain an important part of the character of the Peak District. It is hoped that the conservation and enhancement of this habitat will be accompanied by a reversal in the depressing decline in marshland plants and important birds such as the curlew.'*

**'OBJECTIVES AND TARGETS**

**Objective 1**

***Safeguard all existing rush pasture of botanical, bird or invertebrate importance by ensuring favourable management aimed at achieving favourable condition.***

***Target***

*Initiate management by 2005 to bring 50% of all rush pasture into favourable condition. Review and set a new target for 2005 - 2010.*

***Objective 2***

*Enhance the rush pasture habitat to achieve an extension in the habitat of key species.*

***Target***

*Initiate the restoration of 100 ha of poor quality rush pasture by 2005 and 500 ha by 2010 to provide quality habitat for key species, targeting important sites.*

***Objective 3***

*Create new areas of rush pasture with the priority being to link or extend existing areas, for example alongside stream-sides or in relation to key species.*

***Target***

*Initiate the creation of new rush pasture by 2010, where this is essential in linking and extending the habitat.'*

***Main Factors Likely to Affect Achievement of Targets***

***Practical Difficulties and Gaps in Knowledge. Inadequate understanding of the habitat and the management necessary for its conservation and enhancement.***

***Others The critically small size of populations of key species. The fragmentation and small size of some rush pastures, particularly botanically rich wetlands. Lack of safeguard or effective conservation mechanisms outside of SSSIs - it is often at the time of change of ownership that pastures, as with other grassland habitats, are most at risk. At present there is no systematic procedure or mechanism for conservation bodies and local authorities to have an opportunity to safeguard such land."***

I believe this Peak District LBAP (Rush Pasture) is adequate reason for refusal of the Gladman Planning Application through the destruction of a Rush Pasture Site by Residential Development.

**2. I object to the Planning Application** as the proposed site fields have been designed as a soak-away for Linglons Ave. housing estate surface water. There is a surface water outfall within the Planning Applications western boundary. The fields are also subject to groundwater flooding.

**It is a SuDS system.**

According to NPPF guidelines the Gladman Planning Application area should be protected from development. The NPPF guidelines (SFRA 'be used to identify the functional floodplain') states:

*'If an area is intended to flood, e.g. an upstream flood storage area designed to protect communities further downstream, then this should be safeguarded from development and identified as functional floodplain, even though it might not flood very often.'*

Please note the reference is an example, but it fits the Gladman Planning Application well: The site floods seasonally in wet weather

(ref: British Geological Soc. [http://www.bgs.ac.uk/research/groundwater/flooding/groundwater\\_flooding.htm](http://www.bgs.ac.uk/research/groundwater/flooding/groundwater_flooding.htm) Section: Characteristics of groundwater flooding – last para 'Exceptionally large flows.....')

The discharge is into the West end of the Planning Application fields with no visible outlet i.e. it is discharged into the field (see Gladman Planning Application Appendix 1B and Appendix.3 U.U. Drainage Maps.

The diversion of an existing SuDS system direct to the River Goyt sets an interesting precedent for all SuDS systems. If this planning application is granted SuDS systems will become **nationally** vulnerable to removal for further residential development.

Yours sincerely,

Jon Hooley/MRCS, MCIWEM.