

From: planningcomments@highpeak.gov.uk
To: [Planning Comments \(HPBC\)](#)
Subject: Comment Received from Public Access
Date: 21 December 2022 22:29:58

Application Reference No. : HPK/2022/0484

Site Address: Land off Long Lane South of Chapel-en-le-Frith High School Chapel-En-Le-Frith Derbyshire SK23 0TQ

Comments by: Peter Soden

From:

Downlee Lodge
Bankhall Drive
High Peak
Chapel-en-le-Frith
Derbyshire
SK23 9UB

Phone:

Email:

Submission: Objection

Comments: This Application seeks to change the use of exactly the same area of countryside that was the subject of the very similar application hpk/2021/0388, which was withdrawn last year presumably due to the large number of objections and problems that the consultation revealed. The current planning notice next to the field appeared only a few days before the public consultation closing date. In view of the similarities of the two applications and the limited time available for comment this time around, the committee should take into account all of the comments that local people took the trouble to make in response to the previous application.

In 2010 Derbyshire County Council's landscape architects reported an extensive study of Areas of Multiple Environmental Sensitivity (AMES) outside the National Park. That study examined the combined visual, ecological and historic aspects of the sensitivity to development of landscape areas throughout Derbyshire. Only a tiny fraction of the High Peak District outside the National Park was identified as being of Primary Sensitivity and that area of Primary Sensitivity includes the proposed development site. In a separate study, evidence gathered by Chapel Vision in preparation of the Chapel Parish Neighbourhood Plan showed that a large number of local residents wanted to protect from development an area to the South-West of Chapel very similar in extent to that which the DCC study had identified and they particularly wanted to protect the area of countryside that is the subject of the current planning application. Development should not be allowed on an area of countryside such as this which is considered special by both local people and by independent experts.

A remarkably large number of local people use the public footpath on Bankhall Drive that passes up alongside the application site and connects to a network of fine and accessible country walks. At the site visit the Development Control Committee should approach the site from under the railway arch to observe and appreciate how the railway embankment acts as a protective boundary between the built-up area and the open countryside. No development, be it accommodation units, car ports, or even hedges or trees should be allowed to obstruct the open views and character of the landscape here. Such development would be a significant intrusion into countryside and degrade the open character of the start to the popular country walks.

The developers' habitat survey describes the application site as 'Improved grassland', and notes that this habitat has changed to become drier and with more ruderal vegetation since their previous survey in December 2020, which identified the site as 'comprising mainly marshy grassland'. That change is almost certainly temporary and due to this summer's extended drought and introduction of horses to the site. If allowed to do so, it would revert to wet rush pasture, like much of the valley pastures that extend to Combs reservoir and beyond, of which the application site is a continuous part. Such wet grassland and rush pastures have value as wildlife habitat. For example, the local South West Peak Biodiversity Action Plan points out that even botanically-poor rush pasture can have considerable conservation benefit to breeding wading birds.

In response to the previous application Derbyshire Wildlife Trust drew the developers' attention to the nearby Derbyshire Local Wildlife Site (HP197, Downlee Lodge and Barlow's Field), which was not mentioned in their 2020 survey. The bird species said to be of greatest conservation concern in this country is the Curlew. The largest number of curlew ever recorded by the Derbyshire Ornithological Society anywhere in Derbyshire is a gathering of 190 birds. That was on the Downlee Wildlife Site in March 2017, in a field only 300 metres from the proposed glamping site. I can provide a photograph showing 40 curlew in March 2018 on a field even closer to the proposed glamping site, at Downlee Farm which lies between Downlee Lodge and the glamping site, and also a video of 30 curlew feeding in that same field in March 2020. That field is grazed by sheep and the habitat is rather similar to that in the proposed glamping site.

The 2022 Habitat survey now recognises the existence of the nearby Wildlife site and that consideration and mitigation should be made for an increase in the use of adjoining footpaths between the site that may cause disturbance of the birds. Meaningful mitigation would be difficult. In Sections 4.13 and 5.4 the habitat surveyor recommends the provision of signage and educational packs. This is well intentioned but to put up notices (additional to those already there) asking people to keep dogs on a lead and drawing attention to the footpaths, is unlikely to be effective in mitigating the intrusion on the nearby gatherings of wading birds.

Apart from wading birds the developer's habitat survey does not contain any records of other birds of conservation concern present in the area but the Derbyshire Ornithological Society (DOS) hold extensive records of many Red, Amber and BAP Listed bird species of conservation concern, that are relevant to this planning application.

The Development Control Committee have a legal duty to consider biodiversity but they cannot do so without comprehensive and up-to-date information. Information on all species of conservation concern in the surrounding area should be provided with the planning application and should be considered by the Development Control Committee, together with advice on possible effects on the species of increased noise pollution etc. At the very least, up-to-date wildlife data for the surrounding area, as far as Combs Reservoir SSSI, should be obtained from the Derbyshire Ornithological Society and the Derbyshire Biological Records Centre.

Do you really need to print out this Email? Be green - keep it on the screen.

This email is intended for the addressee(s) only and may contain sensitive, privileged or confidential information that could be protectively marked. If you are not the addressee please do not use the information in any way. If you have received this email in error please notify the sender immediately and delete it from your system. Thank you.

The Council may be required to disclose this email or any responses to it under the Freedom of Information Act 2000. The way in which we handle personal information is set out in our privacy notice and is available at <https://www.highpeak.gov.uk/YourData>

