From: planningcomments@highpeak.gov.uk
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To: Planning Comments (HPBC)
Subject: Comment Received from Public Access

Application Reference No. : HPK/2024/0154 Site Address: Land Off Cottage Lane Gamesley Glossop Derbyshire
Comments by: Craig Robinson
From:

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Submission: Objection
Comments: Application Number - HPK/2024/0154

Site Address - Land Off Cottage Lane, Gamesley, Glossop, Derbyshire

I Craig Robinson, strongly OBJECT to the proposed plan.

In addition to the many objection submissions seen in the application comments, the below information further contributes to the overwhelming evidence that the proposed development poses significant threats to the local environment, biodiversity, and community well-being. The destruction of this mature and irreplaceable woodland would result in a severe loss of habitats for numerous species, violating both national and local policies which are in place to protect our green spaces and the welfare of both humans and wildlife.

1. National Planning Policy Framework (NPPF)

The plans as set out do not comply with a significant number of elements of the the National Planning Policy Framework (NPPF), Section 11, sub-section 124, paragraph a) which states that a plan must ¿encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains ¿ such as developments that would enable new habitat creation or improve public access to the countryside¿ as well as paragraph b) which states ¿Planning policies and decisions should: recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production¿ all of which enhances the natural sustainability of this land if it remains in its current state. The below details some of many examples as to why the defined proposition cannot be deemed sustainable and also that the developers are deliberately masking that the proposed plans will have a negative impact on sustainability by omitting or lying about certain details;

In the development plans ¿Energy and Sustainability Statement¿, section ¿3 Development Proposals¿, it states ¿The proposed development site currently comprises a light industrial building, which includes a workshop and associated buildings and hard-standing areas (see Figure 3.1). The site is located within a predominantly residential setting located within the settlement boundary of Gamesley. The site is bound by Cottage Lane to the West and woodland areas to the North, East and South boundaries.¿ The above does not acknowledge the many functions of under developed land, in fact it ignores the fact that the predominant scope of the land is green and wooded. The plan does this by falsely stating ¿The site is located within a predominantly residential setting¿ which is misleading to those reviewing the plans.

2. Arboriculture

The Forestry Commission states that ¿There is the potential for the remaining ancient woodland to be damaged by visitors, new gardens, and domestic pets. Impacts to consider include disturbance to birds, protected species, woodland flora and soil; fly tipping; garden encroachment, and cat predation. Also consider the impact of increased public use near veteran trees.¿ Currently, access is limited to one path through the woodland, and deeper woodland is rarely accessed. With the current plans, woodland will be removed and access to remaining woodland will be increased. The woodland that will be exposed is ancient woodland and a wildlife site according to the Local Plan, and therefore has higher levels of protection.

The recommendation in the Arboriculture Constraints Report states that ¿The site survey identified a total of 69 individual trees, two groups of trees, three hedges and one woodland on and adjacent the site. These included two individual trees graded Category A (trees of high value), 19 individual trees, one group and one woodland graded Category B (trees of moderate value), 41 individual trees, one group and three hedges. Seven individual trees were graded Category U (trees unsuitable for retention). A review of High Peak Borough Council online records has established there is a Tree Preservation Order covering trees within the site, (HPTPO 306, W1) and another adjacent on the eastern boundary of the site (HPTPO 169 A1, A2). Regarding the above it is emphasised that the scheduling or carrying out of any works to trees covered by TPO protection at the site, that are not directly related to the implementation of a detailed (i.e. full) planning permission, must be authorised.¿ The preservation order was put in place by HPBC for a reason and must not be dismissed for the prominent purpose of profit.

It also states that "An appraisal of the documentation provided to date identified that construction of the development as proposed will require the removal of seven individual trees, one group of trees and part of one woodland graded ¿B¿ category, 25 individual trees, one group of trees and three hedges graded ¿C¿ category. Six individual trees graded ¿U¿ category. To compensate for the net deficit of trees, a wider Tree Replacement Strategy is proposed, to be developed in liaison with local authority. The aim for this strategy will be to deliver a net gain for trees.¿

These plans go against the recent ¿Emergency Tree Plan for the UK¿ policy which has been delivered to the government by The Woodland Trust - which strongly states that we have to protect the current trees which we already have. Planting new trees will take 10-20 years to have the same value. This is yet another example of ambiguous statements misleading the plan reader, omitting key facts such as time periods ¿ Net gain by when?

3. Wildlife, Biodiversity & Green Spaces

The woodland site outlined for development is a mature, thriving ecosystem, home to deer, amphibians, bats, reptiles, hedgehogs, over ONE HUNDRED bird species recorded within the site area and within 250m of the boundary, according to the Ecological survey (including nesting birds, a Tawny owl, and several plants and species on the Priority Habitats & Species list within the site area), and at least 25 species of broad land and scattered trees. The significant loss of biodiversity, wildlife, habitats, green spaces would be devastating both to the nature that resides there as well as the vast number of local residents shown by comments on the plan and passionately via social media outlets. It would be a moral disgrace to destroy these irreplaceable habitats. Significant amounts of woodland and green spaces in the local area have already been lost. A habitat loss of over 76% according to the Biodiversity Report is an unacceptable level of loss to the area.

According to the Biodiversity report, ¿the site predominantly comprises Deciduous Woodland Biodiversity Action Plan (BAP) Priority Habitat anticipated to provide valuable foraging, commuting and refuge opportunities for a range of local fauna. The site is also identified as an ¿Area of Countryside¿ within the High Peak Adopted Local Plan (2016) under policies EQ3, EQ2 and E1, and links to Dinting Nature Reserve approximately 20 m east. As such, the strategic significance was defined as ¿Formally Identified Within Local Strategy¿.¿ Additionally, according to the Local Plan, the entire area of development will be replacing a ¿protected tree area¿. There is also a TPO in place for a tree on the boundary of the plan - even if this is not destroyed, building works next to the tree and within the root area will have a detrimental effect.

The site is also located within 1 km of eight Local Wildlife Sites (LWS), the closest of which comprises Dinting Nature Reserve, located approximately 45 m east. Additionally, two Potential Local Wildlife Sites (PLWS) are located within 1 km of the site; the site is used as an important wildlife corridor for an abundance of wildlife. There is significant potential for the development to negatively impact these LWS.

The plans ecological report was conducted in 2023. It is likely that further wildlife, flora and fauna is now present.

3. Impact of flooding & land slip

The Crowberries, an in process development which also was accepted by committees following reviews has suffered from significant land movement resulting in its demolition with significant loss of materials. This shows that surveys prior to the commencement of acceptance and building were not completed correctly and not reviewed or challenged locally by High Peak Borough Council.

Natural flood management (NFM) is the alteration, restoration or use of landscape features to reduce flood risk. Trees, hedgerows and woods are a vital part of natural flood management.

An example of negative impacts in the local area of development related flooding and increased water flow is the development on North Road Glossop where streams of rain water can be seen cascading down the road into the town centre which was previously retained by green land hedges and trees. The Cottage Lane development is on

high ground and comes with the same consequences. Choosing to build here rather than on the number of brown belt areas available in Glossop and the surrounding area is an acceptance of risk by the local authorities.

The NPFF states that there is a requirement to ¿prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans and remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.¿ And this should be a priority. Trees are vital for soil retention.

According to High Peak Borough Council information, the area is at risk of surface flooding, and as trees and woodland act in multiple ways to prevent flooding - canopy cover which increases evaporation, root systems which absorb vast amounts of water and also help the water to penetrate the ground. Compared to asphalt, trees absorb 80% more rainwater. This is especially vital due to the increased storms, rain, and unpredictable weather conditions we are facing due to climate change. Further, the trees currently present absorb large amounts of carbon dioxide, effectively slowing down the impact of climate change.

5. High Peak Local Policy Conflict

Plans do not align with local HPBC policy for sustainable development, plans should:

¿ Make effective use of land (including the remediation of contaminated land and reuse of brownfield land), buildings and existing infrastructure. The plans do not do this, this is a green space.

¿ To encourage the efficient use of previously developed land and buildings whilst minimising the use of greenfield land. The plans do not do this, planned area is largely woodland.

¿ Protect and enhance the natural and historic environment of the High Peak. The plans do not do this, they have the exact opposite impact by destroying nature.

¿ Minimise the need to travel by promoting development in locations where there is access to a broad range of jobs, services and facilities which are accessible by foot, cycle or public transport with minimal reliance on the private car. The plans do not do this, current footpaths will be inconveniently diverted and each dwelling will likely have multiple cars meaning the possibility of up to or over 100 additional vehicles in the area which is unsustainable.

¿ Minimise the risk of damage to areas of importance for nature conservation and/or landscape value, both directly and indirectly and ensuring that there is suitable mitigation for a net gain in biodiversity and the creation of ecological network. The plans do not do this, protection orders are in place but will be disregarded is planning is accepted.

¿ Ensure existing infrastructure and services have the capacity to support development when required. The plans do not do this, and this is one of the key concerns of commenters

Closing Statement

In conclusion, the evidence and examples above is incontrovertible as to why the planning authorities must not overlook the facts, turn a blind eye and accept the risk and negative impacts that this proposal brings. They MUST reject this proposal and prioritise preservation of nature, sustainability and wellbeing of the local area over profit, and they can do this by adhering to their own policies which they put in place to protect it.

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