

BERG Response to Applicant's Revised Ecological Survey (HPK/2024/0496)

It appears that Appendix 2: Habitat Map has been extended to include the eastern part of the site, with a new date added (10/04/2025). However, there is no evidence in the revised version that a further ecological survey—whether on-site or desk-based—has been carried out on this eastern section. There is also no explanation provided for why this area was omitted from the original survey. Furthermore why the north eastern section of the site (highlighted below) continues to be omitted raises questions, especially considering that all of this site will be affected by the proposed development.

Appendix 2: Habitat Map

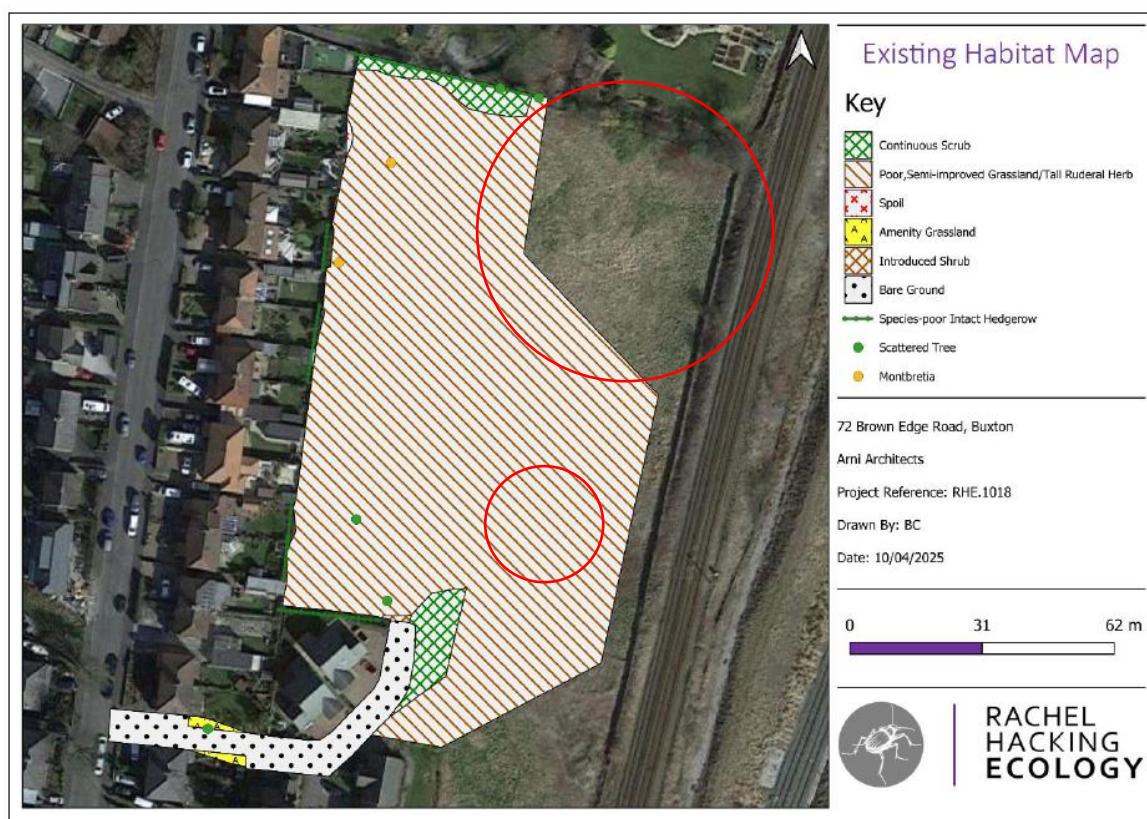


Figure 1. Revised Ecological Survey Habitat Map.

Photographic evidence included in both the original and revised ecological reports only features the western part of the site. Notably, the tree and bush located at the eastern end of the site (pictured below) have not been identified on the updated Habitat Map. The tree and bush are clearly visible on satellite imagery and should have been recorded if the eastern portion of the site had indeed been surveyed. Dr Mark Cocker (author and naturalist) has identified this tree as a goat willow clump, a species 3rd on the British list for trees, important for their ability to support invertebrates.



Figure 2. Omitted tree and bush.

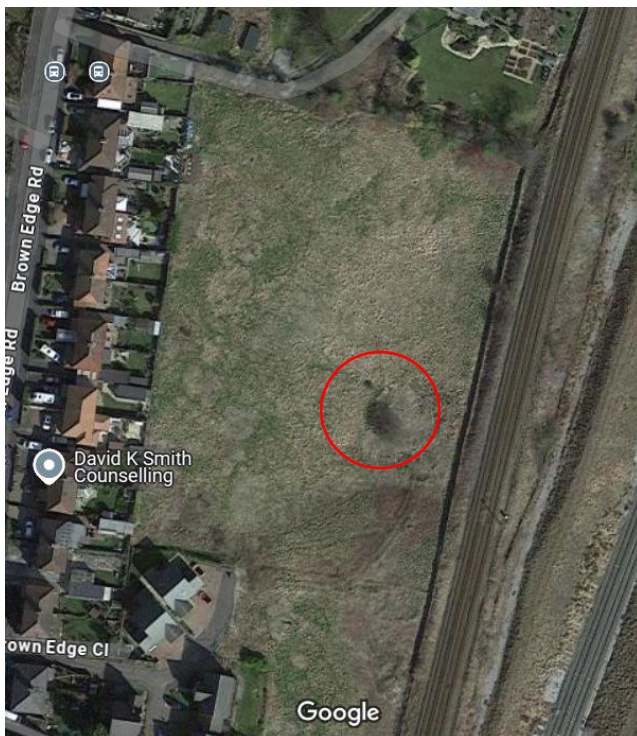


Figure 3. Omitted tree and bush shown on Google Maps.

In addition, the dry stone wall adjoining the eastern boundary—a key habitat feature—has been omitted from both the original and revised survey versions. This further suggests the eastern section has not been subject to proper ecological assessment. Given the unique features of the site, it would be highly unlikely for a qualified ecologist to overlook or misidentify such elements, raising serious concerns about the validity and accuracy of both reports and may affect the Biodiversity Net Gain of the application site.

The [revised ecological report](#)¹ also states that a further survey in 2025 is “undesirable” as the grassland is presumed to be similar to that observed in 2015 and 2023. However, this view fails to consider the full range of habitats and wildlife supported by the grassland. [Derbyshire Wildlife Trust](#)² has already commented that:

“We cannot advise that a robust assessment has taken place at this time of year (December 2023). The report should be updated with a site visit in late spring/summer to ensure a robust assessment and classification of onsite habitats has been undertaken, in line with UKHabs guidance.”

It is increasingly evident that the applicant is seeking to avoid a spring/summer survey, likely due to the presence of habitats beyond grassland—such as those found just 70 metres away at Hogshaw Wildlife Site (LWS)—which cannot be adequately identified through desk-based studies or winter surveys. This position is supported by photographic evidence included in the BERG report.

Additionally, the revised ecological report states (Section 3.2.2):

“There is no direct connectivity from the site to the LWS (Hogshaw) and therefore no direct impact is anticipated from the development.”

This directly contradicts the expert opinion of Derbyshire Wildlife Trust, which states:

“The site has a rail line along its eastern boundary, which provides an ideal corridor for herpetile dispersal.”

The proximity of the LWS also makes it highly likely that seeds, insects, butterflies, and other species could naturally spread to the application site—especially during spring and summer—via airborne or passive transmission. Suggesting a lack of connectivity without significant physical barriers, is misleading and inaccurate. Furthermore a Hogshaw LWS survey conducted by Steve Orridge (Appendix 1) identifies numerous amounts of wildlife (240+) including the rare Bilberry Bumblebee, to suggest that not one of these could naturally disperse onto the application site, considering its close proximity is misleading.

Additionally, the revised ecological report states (Section 2.4.5):

“there are no breeding habitats located on site or within 250m of the site boundary” (for amphibious wildlife)

Contrary to the above two large natural ponds (full of amphibious life) exist at Lowcroft adjacent the site for which there are no physical manmade barriers to limit

the movement of amphibious life. Coupled with the fact the eastern end of the site is known to flood and has a high water table, likely creates suitable conditions for amphibians and other species reliant on wetland habitats. Yet again no assessment of this appears to have taken place.



Figure 4. Location of ponds at Lowcroft adjacent application site.



Figure 5a & 5b. Ponds at Lowcroft adjacent application site.



Figure 5a & 5b. Ponds at Lowcroft adjacent application site.



Figure 6. Amphibious life at northern part of the application site.

In section 2.4.4 of the ecological report it also states that

“a photograph of an ‘ordinary newt’ (non-GCN) has been submitted as part of the current planning application from a garden located over 300 metres from the site. No other amphibian species records were returned from within 250 metres of the site”

The above statement is false, the picture was submitted by [John Overton](#) of 6 Brown Edge Close, this dwelling sits directly adjacent to the site and not over 300 metres away as stated. The location of this dwelling is shown below.

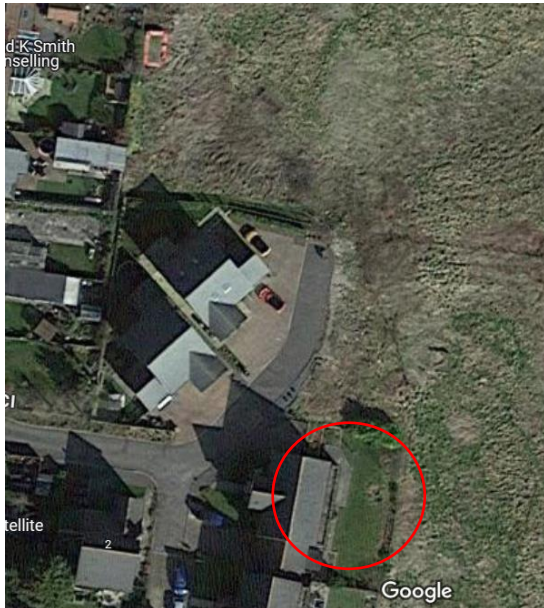


Figure 7. Location of the Newt, adjacent application site.

Conclusion

The evidence clearly shows that the eastern section of the site has not been adequately, accurately, or comprehensively surveyed. The omission of key features calls into question the robustness of both the original and revised ecological reports including amphibious life. As such, we strongly recommend that a full ecological survey is carried out during late spring and summer to provide a true and reliable assessment of the habitats present. Furthermore as the application site has not been used for agriculture since October 2007, the scrub condition to which this site is moving is now considered the most important, biodiverse and valued by Natural England. In land recovery schemes this site would attract the highest payment.

We would also like to extend an invitation to the HPBC case officer who is responsible for this application to visit the site during late spring/summer to make their own observations and assessments in light of the concerns raised above.

Furthermore our comments are fully supported by Dr Mark Cocker, an author and naturalist who has made his own observations and comments regarding the ecological value of the application site. Dr Cocker's comments are included in this submission after the references and appendix below.

References

1. Dr Rachel Hacking Ecology. (2025, February, 10). Land off Brown Edge Close, Buxton.
<http://planning.highpeak.gov.uk/portal/servlets/AttachmentShowServlet?ImageName=551189>
2. Derbyshire Wildlife Trust. (2025, February, 18). Land off Brown Edge Close, Buxton.
<http://planning.highpeak.gov.uk/portal/servlets/AttachmentShowServlet?ImageName=549164>
3. John Overton. (2025, January, 3). Newt.
<http://planning.highpeak.gov.uk/portal/servlets/AttachmentShowServlet?ImageName=547400>

Appendix 1 – Steve Orridge Hoghsaw Local Wildlife Site Survey.

Code	Taxon	Vernacular	Authority	Records	Individuals	First Recorded	Last Recorded	Status
6	Sorex araneus	Common Shrew	Linnaeus, 1758	1	1	2020	2020	
9	Talpa europaea	Northern Mole	Linnaeus, 1758	1	1	2023	2023	
2.001	Acanthosoma haemorrhoidale	Hawthorn Shieldbug	(Linnaeus, 1758)	1	1	2020	2020	Common
4.045	Stigmella aurella	a moth	(Fabricius, 1775)	4	1	2019	2021	Common
42.019	Rhagonycha fulva		(Scopoli, 1763)	2	2	2022	2022	
69.034	Adalia decempunctata	10-spot Ladybird	(Linnaeus, 1758)	2	2	2021	2021	
69.042	Coccinella septempunctata	7-spot Ladybird	Linnaeus, 1758	3	3	2021	2021	
7.021	Palomena prasina	Common Green Shieldbug	(Linnaeus, 1761)	4	16	2021	2021	Common
7.024	Picromerus bidens	Spiked Shieldbug	(Linnaeus, 1758)	1	1	2021	2021	Common
79.002	Lagria hirta		(Linnaeus, 1758)	1	1	2021	2021	
80.009	Oedemera nobilis	Swollen-thighed Beetle	(Scopoli, 1763)	1	1	2021	2021	
85	Cepaea hortensis	White-tipped Snail	(O.F. Müller, 1774)	1	1	2021	2021	
9	Paroligolophus agrestis		(Meade, 1855)	2	2	2021	2021	
92.144	Agelastica alni		(Linnaeus, 1758)	1	1	2021	2021	RDBK
95	Phasianus colchicus	Pheasant	Linnaeus, 1758	1	1	2021	2021	C
10.01	Rhopalus subrufus		(Gmelin, 1788)	1	1	2021	2021	Local
1016	Hypericum tetrapterum	Square-stalked St John's-wort	Fr.	1	0	2020	2020	
1023	Ilex aquifolium	Holly	Linnaeus	2	0	2021	2021	
10275	Apis mellifera	Western Honey Bee	Linnaeus, 1758	5	1	2020	2021	
10277	Bombus lucorum sens. lat.	White-tailed Bumblebee	(Linnaeus, 1761)	2	0	2020	2020	
10277	Bombus lucorum/terrestris	White-tailed/Buf-tailed Bumblebee		1	1	2021	2021	
10279	Bombus terrestris	Buff-tailed Bumblebee	(Linnaeus, 1758)	4	1	2020	2021	
10284	Bombus lapidarius	Red-tailed Bumblebee	(Linnaeus, 1758)	4	2	2020	2021	
10293	Bombus monticola	Bilberry Bumblebee	Smith, 1849	2	30	2020	2021	
10294	Bombus pratorum	Early Bumblebee	(Linnaeus, 1761)	1	1	2021	2021	
10299	Bombus pascuorum	Common Carder Bee	(Scopoli, 1763)	8	1	2013	2021	
1077	Juncus tenuis	Slender Rush	Willd.	1	0	2020	2020	
10931	Dolichovespula sylvestris	Tree Wasp	(Scopoli, 1763)	1	1	2020	2020	
1116	Lathyrus pratensis	Meadow Vetchling	Linnaeus	5	0	2020	2021	
112	Oryctolagus cuniculus	Rabbit	(Linnaeus, 1758)	1	1	2023	2023	
1142	Leycesteria formosa	Himalayan Honeysuckle	Wallich.	2	0	2020	2021	
1164	Linaria vulgaris	Common Toadflax	Mill.	1	0	2020	2020	
1173	Neottia ovata	Common Twayblade	(L.) Bluff & Fingerh.	1	0	2021	2021	
1188	Lonicera periclymenum	Honeysuckle	Linnaeus	1	1	2023	2023	
1191	Lotus corniculatus	Common Bird's-foot-trefoil	Linnaeus	1	0	2021	2021	
125	Anthriscus sylvestris	Cow Parsley	(L.) Hoffm.	2	0	2020	2021	
1250	Medicago lupulina	Black Medick	Linnaeus	4	1	2020	2021	
126	Anthyllis vulneraria	Kidney Vetch	Linnaeus	1	0	2021	2021	
13.03	Salmo trutta	Brown Trout	Linnaeus, 1758	1	4	2021	2021	
1343	Narcissus pseudonarcissus subsp. pseudonarcissus	Daffodil		2	0	2021	2021	
1361	Odonites vernus	Red Bartsia	(Bellardi) Dumort.	1	0	2020	2020	
1423	Paeonia mascula	Peony	(Linnaeus) Miller	1	0	2020	2020	
1447	Petasites hybridus	Butterbur	(Linnaeus) P.Gaertner, Meyer & Scherb.	2	0	2021	2021	
1466	Asplenium scolopendrium	Hart's-tongue	L.	1	0	2021	2021	
1487	Plantago lanceolata	Ribwort Plantain	Linnaeus	1	0	2020	2020	
15.089	Cameraria ohridella	a moth	Deschka & Dimic, 1986	2	0	2021	2021	Common
1528	Fallopia japonica	Japanese Knotweed	(Houtt.) Ronse Decraene	2	0	2020	2020	
1537	Persicaria maculosa	Redshank	Gray	1	0	2020	2020	
1584	Potentilla anserina	Silverweed	Linnaeus	3	0	2020	2021	
1611	Prunus avium	Wild Cherry	(Linnaeus) Linnaeus	1	0	2020	2020	
1628	Pulmonaria officinalis	Lungwort	Linnaeus	1	0	2021	2021	
1649	Ficaria verna	Lesser Celandine	Huds.	1	0	2021	2021	
1660	Ranunculus repens	Creeping Buttercup	Linnaeus	2	0	2020	2020	
1675	Dasineura urticae		(Perris, 1840)	2	0	2021	2021	
1687	Rhododendron ponticum	Rhododendron	Linnaeus	1	1	2023	2023	
1689	Iteomyia caprae		(Winnertz, 1853)	1	0	2021	2021	
169	Arrhenatherum elatius	False Oat-Grass	(Linnaeus) P.Beauv.	2	0	2020	2021	
1729	Rubus idaeus	Raspberry	Linnaeus	1	0	2020	2020	
1742	Rumex crispus	Curled Dock	Linnaeus	3	0	2020	2020	
1748	Rumex obtusifolius	Broad-leaved Dock	Linnaeus	1	0	2020	2020	
175	Artemisia vulgaris	Mugwort	Linnaeus	4	0	2020	2021	
177	Arum italicum	Italian Lords-and-Ladies	Mill.	1	0	2021	2021	
1786	Rabdophaga rosaria		(Loew, 1850)	1	0	2021	2021	
18.01	Nabis limbatus		Dahlbom, 1851	2	4	2021	2021	Common
1805	Salix viminalis	Osier	L.	1	0	2020	2020	
1818	Sanguisorba officinalis	Great Burnet	Linnaeus	1	0	2020	2020	
1822	Cytisus scoparius	Broom	(Linnaeus) Link	2	0	2020	2021	
1867	Scrophularia nodosa	Common Figwort	Linnaeus	2	0	2020	2020	
1899	Senecio jacobaea	Common Ragwort	Linnaeus	1	0	2020	2020	
1902	Senecio squalidus	Oxford Ragwort	Linnaeus	1	1	2021	2021	
194	Asplenium trichomanes	Maidenhair Spleenwort	Linnaeus	1	0	2020	2020	
1953	Sonchus asper	Prickly Sow-thistle	(Linnaeus) Hill	1	0	2020	2020	
20	Aegopodium podagraria	Ground-elder	L.	1	0	2020	2020	
2005	Stachys sylvatica	Hedge Woundwort	Linnaeus	2	0	2021	2021	
2022	Symphoricarpos albus	Snowberry	(Linnaeus) S.F.Blake	2	0	2020	2020	
2024	Symphytum officinale	Common Comfrey	Linnaeus	1	0	2020	2020	
2033	Tanacetum vulgare	Tansy	Linnaeus	1	0	2020	2020	
2034	Taraxacum agg.	Dandelion		1	0	2020	2020	
208	Buteo buteo	Buzzard	(Linnaeus, 1758)	2	2	2021	2023	A
2091	Trifolium pratense	Red Clover	Linnaeus	1	0	2020	2020	
2092	Trifolium repens	White Clover	Linnaeus	2	0	2013	2020	
2109	Tussilago farfara	Cot's-foot	Linnaeus	3	0	2020	2021	
2126	Urtica dioica	Common Nettle	L.	3	0	2020	2021	
2171	Veronica hederifolia	Ivy-leaved Speedwell	L.	1	0	2021	2021	
2184	Viburnum lantana	Wayfaring-tree	Linnaeus	1	1	2020	2020	
2185	Viburnum opulus	Guelder-rose	Linnaeus	2	0	2021	2021	
2189	Vicia cracca	Tufted Vetch	Linnaeus	1	0	2020	2020	
22.093	Leptopterna dolabrata		(Linnaeus, 1758)	2	2	2020	2020	Very common
22.1	Lygus pratensis		(Linnaeus, 1758)	1	5	2021	2021	RDB3
22.181	Plagiognathus arbustorum		(Fabricius, 1794)	3	3	2020	2020	Very common
22.219	Stenodema laevigata		(Linnaeus, 1758)	1	1	2021	2021	Very common
2205	Vinca minor	Lesser Periwinkle	Linnaeus	1	0	2021	2021	
2207	Aeshna grandis	Brown Hawker	(Linnaeus, 1758)	1	1	2021	2021	
2241	Aesculus hippocastanum	Horse-chestnut	Linnaeus	2	1	2021	2021	
2243	Euphrasia agg.	Eyebright		1	0	2020	2020	
2250	Ligustrum ovalifolium	Garden Privet	Hassk.	1	1	2023	2023	

2260	Ligustrum ovalifolium	Garden Privet	Hassk.	1	1	2020	2020	
2261	Haemaphysalis ostentatus	Oystercatcher	Linnaeus, 1768	1	2	2020	2020	A
2281	Cicerbita macrorrhiza	Common Blue-sow-thistle	(Willd.) Wallr.	1	0	2020	2020	
2289	Betula pendula	Silver Birch	Roth	1	0	2020	2020	
2305	Arctium minus	Lesser Burdock	(Hill) Heron.	1	0	2020	2020	
277	Omocestus viridulus	Common Green Grasshopper	(Linnaeus, 1768)	2	2	2022	2022	
2989	Buxus sempervirens	Holly	L.	1	1	2020	2020	Rare
299	Chorthippus brunneus	Common Field Grasshopper	(Humboldt, 1816)	1	1	2020	2022	
310	Galium palustre	Marsh-marigold	L.	1	1	2022	2022	
311	Caryophyllus sepium	Hedge Bindweed	(Linnaeus) R.Br.	2	0	2021	2021	
32.030	Depressaria radialis	Parasit Moth	(Göze, 1792)	1	0	2020	2020	Common
322	Campanula rotundifolia	Harbell	Linnaeus	1	0	2020	2020	
335	Carduus crispus	Wetted Thistle	Linnaeus	2	1	2020	2021	
347	Chroicocephalus ridibundus	Black-headed Gull	(Linnaeus, 1768)	1	6	2020	2020	A
348	Leucophaea angustata		(Clerck, 1767)	1	1	2021	2021	
3796	Metellina segnentata/mengesi sens. lat.		(Linnaeus, 1768)	2	1	2021	2021	
3803	Symptetrus strigatus	Common Darter	(Charpentier, 1860)	2	2	2020	2021	
387	Araneus diadematus	Garden Spider	Clerck, 1767	1	1	2020	2020	
4029	Poecilothrips nobilitatus		(Linnaeus, 1767)	1	1	2020	2021	
404	Carex pendula	Pendulous Sedge	Hudson	0	0	2020	2020	
41.001	Aphrospora alni	Atrichopter	(Hill, 1806)	1	0	2021	2021	Common
41.009	Phaedrus apuratus	Atrichopter	(Linnaeus, 1768)	1	0	2020	2020	Common
4315	Spiraea japonica	Japanese Spiraea	Linnaeus	1	0	2020	2020	
436	Columba palumbus	Woodpigeon	Linnaeus, 1768	1	1	2020	2020	A
438	Streptopelia decaocto	Collared Dove	(Forsk.) (Sch. 1888)	1	1	2020	2020	A
444	Centauria nigra	Common Knapsweed	L.	1	0	2020	2021	
4616	Paeonia aurantiaca	Fox-and-cubs	(L.) W. Schott & Sch. Bip.	1	0	2020	2020	
466	Pituaia mirabilis		(Clerck, 1767)	1	2	2020	2021	
46	Agua reptans	Hugbo	Linnaeus	1	0	2020	2020	
461	Cerastium arvense	Field Mouse-ear	Linnaeus	1	0	2020	2020	
4613	Melanostoma scabre	A hoverfly	(Fabricius, 1794)	1	0	2020	2020	
4616	Platycherus abdominalis	A hoverfly	(Fabricius, 1791)	1	1	2020	2022	
4622	Dasytyphlus abdominalis	A hoverfly	(Hill, 1817)	1	1	2020	2020	
4667	Eoisomus dactylus	A hoverfly	(De Geer, 1776)	1	1	2020	2021	
467	Cerastium fontanum	Common Mouse-ear	Humboldt	1	0	2020	2020	
4670	Eupodis corollae	A hoverfly	(Fabricius, 1794)	2	2	2020	2022	
4673	Eupodis lunobae	A hoverfly	(Scott-Hyatt, 1916)	1	1	2020	2020	
4674	Eupodis luggeri	A hoverfly	(Meigen, 1822)	1	1	2020	2020	
4679	Leucocoma glauca	A hoverfly	(Linnaeus, 1768)	1	10	2021	2021	
4767	Chenopodium sp. A	A hoverfly	Chenopodium 1988	1	1	2021	2021	
477	Chamerion angustifolium	Rosely Willowherb	(L.) Holub	1	0	2020	2020	
4772	Phragmites communis	A hoverfly	(Meigen, 1822)	1	1	2020	2020	
48.001	Anthophila tabaciana	A moth	(Linnaeus, 1767)	1	12	2014	2022	Common
4813	Crataegus hortensis	A hoverfly	(De Geer, 1776)	2	2	2020	2020	
4816	Crataegus pinnatifida	A hoverfly	(Clerck, 1768)	1	1	2020	2020	
4819	Crataegus tenax	A hoverfly	(Linnaeus, 1768)	1	1	2020	2021	
4822	Helophorus hybridus	A hoverfly	Löw, 1868	1	1	2021	2021	
4823	Helophorus pendulus	A hoverfly	(Linnaeus, 1768)	2	1	2020	2021	
4827	Myathropa florea	A hoverfly	(Linnaeus, 1768)	2	2	2020	2021	
4828	Merodon equestris	A hoverfly	(Fabricius, 1794)	1	1	2022	2022	
4829	Sericomyia saliens	A hoverfly	(Harris, 1776)	2	2	2021	2021	
4860	Volucella bombylans	A hoverfly	(Linnaeus, 1768)	2	1	2020	2021	
4876	Syntha pipiens	A hoverfly	(Linnaeus, 1768)	1	1	2021	2021	
49.379	Parmenella aurata	A moth	(Fabricius, 1776)	1	0	2020	2020	Common
5	Acer pseudoplatanus	Sycamore	Linnaeus	1	0	2019	2019	
5	Forticula auriculata	Common Earwig	Linnaeus, 1768	2	9	2021	2021	
502	Leucanthemum vulgare	Oxeye Daisy	Lam.	2	1	2021	2021	
5112	Secus ferrugineus		(Linnaeus, 1761)	1	1	2020	2020	
513	Circaea lutetiana	Enchanter's-nightshade	L.	1	0	2020	2020	
516	Cirsium arvense	Creeping Thistle	(Linnaeus) Scop.	1	0	2020	2020	
52.003	Sesia demodermis	Lunar Hornet Moth	(Hübner, 1806)	1	8	2022	2022	LC
522	Cirsium vulgare	Spear Thistle	(Lam.) Ten.	1	0	2020	2020	
533	Cochlearia danica	Danish Scurvygrass	L.	1	1	2019	2019	
54.008	Zygadenus aspidodactylus	Six-spot Burnet	(Linnaeus, 1768)	1	1	2003	2003	LC
54.009	Zygadenus bicoloratus	Narrow-bordered Five-spot Burnet	(Schweber, 1777)	1	11	2022	2022	LC
544	Convolvulus arvensis	Field Bindweed	Linnaeus	1	0	2020	2020	
549	Cornus acerica	Red-osier Dogwood	Linnaeus	1	0	2021	2021	
558	Coturniculus montanus	Jackdaw	(Linnaeus, 1768)	1	1	2020	2020	A
563	Corvus corone	Garron Crow	Linnaeus, 1768	2	2	2020	2020	A
57.006	Thymelicus sylvestris	Small Skipper	(Poda, 1761)	2	14	2021	2022	
57.009	Ocnodes sylvestris	Large Skipper	(Kaper, 1777)	4	10	2003	2016	
58.003	Anthracinus cardamineae	Orange-tip	(Linnaeus, 1768)	1	14	2014	2021	
58.006	Pieris brassicae	Large White	(Linnaeus, 1768)	2	2	2020	2021	
58.007	Pieris rapae	Small White	(Linnaeus, 1768)	1	10	2014	2021	
58.008	Pieris napi	Green-veined White	(Linnaeus, 1768)	1	20	2014	2022	
58.013	Gonepteryx rhamni	Brimstone	(Linnaeus, 1768)	1	1	2020	2020	
584	Cyanistes caeruleus	Blue Tit	(Linnaeus, 1768)	2	1	2020	2020	A
587	Parus major	Great Tit	Linnaeus, 1768	1	1	2020	2020	A
59.002	Lasiommata megera	Wall	(Linnaeus, 1767)	1	1	2020	2020	
59.003	Pararge aegeria	Speckled Wood	(Linnaeus, 1768)	1	9	2014	2022	
59.006	Coenonympha pamphilus	Small Heath	(Linnaeus, 1768)	2	2	2021	2022	
59.009	Aphantopus hyperantus	Hinglet	(Linnaeus, 1768)	1	11	2020	2022	
59.01	Maniola jurtina	Meadow Brown	(Linnaeus, 1768)	4	18	2014	2022	
59.011	Pyronia tithonus	Gatekeeper	(Linnaeus, 1771)	1	1	2014	2021	
59.023	Vanessa atalanta	Red Admiral	(Linnaeus, 1771)	1	1	2014	2021	Migrant
59.024	Vanessa cardui	Painted Lady	(Linnaeus, 1768)	1	1	2021	2021	Migrant
59.026	Amphispiza bilineata	Peacock	(Linnaeus, 1768)	2	1	2020	2022	
59.027	Agrostis alba	Small Tortoiseshell	(Linnaeus, 1768)	2	26	2014	2022	
5909	Phytomyza ranunculivora	A leaf-miner fly	(Hering, 1882)	2	0	2021	2021	
597	Cynotriton cristatus	Crested Dog-tail	Linnaeus	1	0	2021	2021	
605	Arctostaphylos uva-ursi	Cock's-foot	(Clerck, 1767)	2	1	2021	2021	
607	Dactylis glomerata	Linnaeus	Linnaeus	1	0	2021	2021	
608	Dactylis glomerata	Common Spotted-orchid	(Druce) Sed	1	0	2021	2021	
61.018	Polioptila caerulea	Common Blue	(Hottelburg, 1776)	1	6	2014	2022	
622	Aegialitis caudata	Long-tailed Tit	(Linnaeus, 1768)	1	1	2020	2021	A
625	Phylloscopus trochilus	Willow Warbler	(Linnaeus, 1768)	1	1	2014	2021	A
628	Phylloscopus collybita	Chiffchaff	(Vieillot, 1817)	1	0	2020	2021	A
63.025	Anas hortensis	Small Mallard	(Linnaeus, 1768)	1	1	2016	2021	Common
63.026	Uta stansburiana	A moth	(Hübner, 1809)	1	1	2021	2021	Common
64	Alliaria petiolata	Garlic Mustard	(M. B. B. B.) Cavan & G. G. G.	2	0	2020	2021	
664	Dryopteris filix-mas agg.	Common Male Fern	(Linnaeus) Schott	1	0	2020	2020	
678	Sylvia atricapilla	Blackcap	(Linnaeus, 1768)	1	1	2020	2020	A
680	Sylvia borin	Garden Warbler	(Woodward, 1784)	1	1	2021	2021	A
686	Hyacinthoides hispanica	Spanish Bluebell	(Miller) Rothm.	1	0	2020	2020	
690	Sylvia communis	Whitethroat	(Linnaeus, 1767)	1	1	2014	2019	A
6970	Saccoliphaea stercoraria		(Linnaeus, 1768)	2	0	2021	2021	
70.014	Xanthoxanthus montanatus	Silver-ground Carpet	(Dennis & Schiffermüller, 1776)	1	9	2014	2016	LC
70.218	Chamaecrista ciliolata	Lattice Heath	(Linnaeus, 1768)	1	9	2014	2022	NI
705	Isodactylus helleborine	Broad-leaved Helleborine	(L.) Crantz	1	1	2020	2021	
707	Troglodytes troglodytes	Wren	(Linnaeus, 1768)	1	1	2021	2021	A
718	Certhia familiaris	Tree Creeper	Linnaeus, 1768	2	2	2021	2021	A

718	<i>Certhia familiaris</i>	Treecreeper	Linnaeus, 1758	2	2	2021	2021	A
72.084	<i>Cassiopea</i>	Mother Shipton	(Black, 1769)	1	1	2014	2014	LC
743	<i>Turdus merula</i>	Blackbird	Linnaeus, 1758	1	1	2024	2024	A
76	<i>Alnus urtica</i>	Hamsons	Linnaeus	1	0	2021	2021	
766	<i>Crithacus rubicula</i>	Robin	(Linnaeus, 1758)	2	2	2021	2024	A
7747	<i>Rhytidia acerinum</i>		(Pers.) Fr.	1	0	2021	2021	
7742	<i>Rhytidia rubicundum</i>		(Pers.) Fr.	1	0	2021	2021	
7764	<i>Sarcophaga carnaria</i>		(Linnaeus, 1758)	1	0	2020	2020	
7815	<i>Sarcophaga austriaca</i>		(O. Beck ex Jacq.) Houd.	2	4	2020	2021	
8040	<i>Tachina urtica</i>		(Meigen, 1824)	1	1	2021	2021	
824	<i>Prunella modularis</i>	Dunnock	(Linnaeus, 1758)	2	0	2020	2021	A
82	<i>Tachydodatus niger</i>	White-tailed Snake-millstone	(Lacn, 1816)	2	2	2021	2021	
864	<i>Fringilla coelebs</i>	Chaffinch	Linnaeus, 1758	2	1	2014	2024	A
874	<i>Gallus asparine</i>	Crow	L.	2	0	2020	2020	
900	<i>Carduelis carduelis</i>	Goldfinch	(Linnaeus, 1758)	1	1	2024	2024	A
914	<i>Geranium pratense</i>	Meadow Crane's-bill	Linnaeus	4	0	2014	2020	
924	<i>Gem. rhyde</i>	Water Aven	Linnaeus	1	1	2021	2021	
968	<i>Heracleum sphondylium</i>	Hogweed	L.	2	0	2014	2020	
976	<i>Hesperis matronalis</i>	Dame's-violet	L.	1	0	2020	2020	
984	<i>Hokus lanatus</i>	Yorkshire-fog	Linnaeus	1	0	2020	2020	
L018.01	<i>Metzgeria violacea</i>	Bluish Vellwort	(Ach.) Dumort.	1	0	2024	2024	
L018.02	<i>Metzgeria furcata</i>	Forked Vellwort	(L.) Corda	1	0	2024	2024	
L024.01	<i>Radula complanata</i>	Even Scatwort	(L.) Dumort.	1	0	2024	2024	
L024.06	<i>Frullania dilatata</i>	Dilated Scatwort	(L.) Dumort.	1	0	2024	2024	
M016.01	<i>Funaria hygrometrica</i>	Montie Moss	Hedw.	1	0	2024	2024	
M070.01	<i>Selaginella selaginella convolutum</i>	Lesser Bird's-claw Beardmoss	(Hedw.) P. Beauv.	1	0	2024	2024	
M071.01	<i>Barbula unguiculata</i>	Bird's-claw Beardmoss	Hedw.	1	0	2024	2024	
M072.05	<i>Didymodon latius</i>	False Beardmoss	(Hedw.) H. H. Zander	1	0	2024	2024	
M072.10	<i>Didymodon instans</i>	Cylindric Beardmoss	(De Not.) M. O. Hill	1	0	2024	2024	
M082.17	<i>Scniscidium c. raxipsum</i>	Thickpoint Gramma	H. H. Hill	1	0	2024	2024	
M084.16	<i>Grimmia pulvinata</i>	Grey-cushioned Gramma	(Hedw.) Sm.	1	0	2024	2024	
M118.06	<i>Plagiomnium undulatum</i>	Hair's-tongue Thyme-moss	(Hedw.) J. J. Köp.	1	0	2024	2024	
M122.04	<i>Orthotrichum pulchellum</i>	Elegant Bristlemoss	Hunt.	1	0	2024	2024	
M124.01	<i>Plenoclema obvilanthia</i>	Fuzzed Pin cushion	(Hedw.) Sawicki, Platenk & Ochrya	1	0	2024	2024	
M150.01	<i>Cratoneuron filicinum</i>	Fern-leaved Hookmoss	(Hedw.) Spruce	1	0	2024	2024	
M155.01	<i>Leptodictyum riparium</i>	Kneet Feathermoss	(Hedw.) Warnst.	1	0	2024	2024	
M189.01	<i>Kriegeria praelonga</i>	Common Feathermoss	(Hedw.) Ochrya	1	0	2024	2024	
M190.05	<i>Scuro-hypnum populeum</i>	Matted Feathermoss	(Hedw.) Ignatov & Huhtanen	1	0	2024	2024	
M191.01	<i>Brachythecium abicans</i>	Whiten Feathermoss	(Hedw.) Schimp.	1	0	2024	2024	
M191.06	<i>Brachythecium rudatulum</i>	Hough-staked Feathermoss	(Hedw.) Schimp.	1	0	2024	2024	
M195.01	<i>Homatonecium sericeum</i>	Silky Wab Feathermoss	(Hedw.) Schimp.	1	0	2024	2024	
M201.01	<i>Caisergonella cuspidata</i>	Pointed Spear-moss	(Hedw.) Loeske	1	0	2024	2024	
M210.01	<i>Rhynchodeschus squarrosus</i>	Scurdy Lurt-moss	(Hedw.) Warnst.	1	0	2024	2024	
M225.01	<i>Thamnobryum alopecurum</i>	Fox-tail Feathermoss	(Hedw.) Gangulee	1	0	2024	2024	

Objection to Planning Application at Brown Edge Close

Dr Mark Cocker FRLS

The proposed development site at Brown Edge Close is a 3.3 acre field previously used as cattle pasture by a local farmer. That practice was discontinued in c2007 and it has developed into a rough scrubby area that will, in time, acquire many of the pioneering tree species seen at Hogshaw: eg Silver Birch and Goat Willow.

These trees are the first to colonise such sites. They are also the third and fourth most important tree species in Britain (after our two native oaks) for their capacity to support a high diversity of invertebrates: 266 and 229 species respectively.¹ There is a large goat willow clump already developed on site, along with horse chestnut, hawthorn and large areas of bramble and wild raspberry bushes.

The field was classified as semi-improved grassland by the ecological consultants who completed a survey in winter, when the site exhibits none of its characteristic richness for Nature. Had they come in July they would have found a tall herb stand thick with flowering rosebay willowherb, flowering brambles, flowering common hogweed, creeping and spear thistles, which in combination are a massive draw for nectaring insects. No January survey could anticipate this wildlife abundance.

The site supports both nectaring and breeding bumblebees of seven species (Buff-tailed, White-tailed and Red-tailed Bumblebees, Common Carder Bee, Garden, Early and Tree Bumblebees) but the full range of nectaring species here includes Bilberry Bumblebee *Bombus montanus* one of the most special insects in Buxton. The town station area includes an exhibition about the bee. It is the subject of Great Buxton Bilberry Bumblebee Hunt.³ It is judged to be a scarce and declining species nationally. Our Derbyshire town and its surrounding areas are the most south-easterly site for it in Britain.² The wider Hogshaw area is a major nectaring area for the worker bees, even though their nests are on

adjacent moorland sites. They fly down to feed, especially in high summer when this field is a profusion of flowers.

This would be lost were the site developed. Bumblebees have been chosen, incidentally, not because they are the only insects affected. Rather they are representative of an issue affecting *all* invertebrates: moths, butterflies, hoverflies, beetles, etc

They also well illustrate an issue central to the whole planning system, which tries to argue for a *compartmentalised* version of the living world. This is not how Nature operates. Species such as Bilberry Bumblebees need nesting sites on moorland, but they feed in suburban and urban fields, sometimes miles away, where food is more available. That same connectivity, which was totally ignored in the commissioned environmental impact assessment, means that the field is an integral part of both its surrounding area and of the wider Hogshaw matrix.

To deal with the latter first, Hogshaw, a former municipal tip, has evolved in the last 40 years to a semi-natural woodland of primary importance for Nature and for people within the town footprint. No site, other than designated woods, many of them owned or managed by Buxton Civic Association, equals Hogshaw for wildlife importance or for its role in supporting recreation and exercise for and by the local community.

The same process of interconnection operates within the footprint of the proposed development field. The areas immediately adjacent and the shrubbery and trees on the boundaries, but also within the site, support breeding Blackbirds, as well as four breeding summer migrant species: Willow Warbler and Common Whitethroat, Garden Warblers and Chiffchaff. The last two species have increased in Britain, the first expanding its range by 12.6% and Chiffchaffs have increased their numbers by 158%. Yet Blackbirds (-19%), Willow Warbler (-9%) and Common Whitethroat (-63%) are all declining.⁴

It is assumed that these species may be affected partly by climate change, but one indisputable factor in all wildlife decline is loss of habitat. At a local level, people are making seemingly insignificant choices about one development site after another, just like the one at Brown Edge Close. These small supposedly ‘insignificant’ plots are being gobbled up everywhere. And while each on its own may be judged ‘unimportant’, when aggregated they are massively significant. Because Nature doesn’t operate in bits – this part for houses, this site for recreation, this bit for Nature. The sum of life operates at the level of the whole. It is a unitary network. It is because we have ignored that central truth that Britain is judged among the 24 (of 240 nations) most denatured countries on Earth. England by itself is even lower still on that list.⁴

The Environment Act 2021 was a response to the pitiful status of our country for wildlife. It enshrines an aspiration to secure 30 per cent of land for Nature by the year 2030. In placing such a challenge upon us, politicians have assumed that the regions to perform the heavy-lifting in this reversal of British wildlife loss will be our national parks.

In Buxton, which lies outside the Peak District National Park boundary, we might think that we can afford to lose sites such as the Brown Edge Close field, because our region is so rich with the park on our doorstep. This is not the case.

In 2024, the Campaign for National Parks issued a health check report on the condition of all Britain’s national parks. It judged that 6 per cent of the entire national-park estate was effectively managed for Nature. So, 94 per cent is in poor shape.⁶ The frontline on the matter of Nature loss in Britain doesn’t begin or end on a national park boundary. It is right here, in Buxton, on Brown Edge Road, in this field.

Sources

1. www.countrysideinfo.co.uk/woodland_manage/tree_value.htm
2. <https://www.bumblebeeconservation.org/learn-about-bumblebees/species-guide/bilberry-bumblebee/>
3. <https://www.buxtonadvertiser.co.uk/arts-and-culture/folk-encouraged-to-join-the-great-buxton-bilberry-bumblebee-hunt-4688064>
4. <https://www.bto.org/understanding-birds/birdfacts/whitethroat>
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