



Buxton Civic Association
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Buxton Civic Association Ltd,
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To
High Peak Borough Council

26/02/2021

Dear Councillors and Officers.

Buxton Civic Association objection to the sale of land owned by High Peak Borough Council at Hogshaw and Fairfield Common

BCA support the local community in strongly objecting to the sale of this land for potential new housing development. We believe that far from these two sites being assets to be disposed of, they should be seen as key public assets to be cherished and developed in their existing state for the long term benefit of the local community.

Our objections are based on the following concerns:

- 1. Neither the Hogshaw recreation ground or Fairfield Common are designated for housing in the High Peak Local Plan.**
- 2. The loss of yet another playing field / recreation ground** and associated play area (the same part of Buxton has already lost nearby playing fields to make way for the Care Home on Brown Edge Road) is a serious issue depriving local children of a crucially important resource.
This appears to be contrary to **Local Plan policy CF 4 Open Space, Sports and Recreation Facilities** which states "The Council will seek to protect, maintain and where possible enhance existing open spaces, sport and recreational buildings and land including playing fields...."
- 3. The whole of the Hogshaw site is an invaluable informal recreational resource for the local residents** who live immediately around the edge of the site (many of whom live in terraced houses without gardens). It is used for a huge variety of purposes (eg informal play, dog walking, football, exercise, walking, running, biking, den building, picnicking, bird watching, photography, a place to find solitude and contact with nature). It is also one of the few sites in Buxton where teenagers and young people can let off steam without affecting many other people and being seen as antisocial. In many ways it acts as an important social safety valve.

The importance of points 2 and 3 is that Hogshaw is *immediately adjacent to* one of the communities in the town that most need these spaces in the middle of town. The loss of Hogshaw will not be adequately compensated for by provision of smaller areas at the other end of the proposed new housing.



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4. A very large part of **Hogshaw is already designated as a Local Wildlife Site** (Site Ref HP026, Railway Land Hogshaw (former sidings). We can advise that the details of this designation are seriously out of date. We can provide evidence that the site is in fact considerably more important for wildlife than this designation suggests. For instance there is no mention of any fauna – the site is a breeding site and valuable as a winter feeding site for birds. The important Buxton population of swifts regularly feed over it. Likewise Bats regularly feed there. The extraordinary ancient willows that grow there will almost certainly support complex ecosystems of invertebrates and lichens (willows are known to support upto 266 invertebrate species and 160 species of lichen). The plant data is out of date because the register does not record the colony of the locally rare orchid broad leaved helleborine which grows just outside the existing Local Wildlife Site. The register also does not mention the site's unique significance as a wildlife stepping stone and hub for three wildlife corridors (see below).
5. **Hogshaw is one of the most important wildlife sites surviving within the town**
It is an exemplar key **Wildlife Stepping Stone site**. It acts as a hub connecting three of the most valuable **Wildlife Corridors** in Buxton;
 - a. The Hogshaw brook valley connecting Combs Moss moorland, Lightwood and BCA Hogshaw Wood to Hogshaw and on to the River Wye corridor (a Special Area of Conservation).
 - b. The Nunsfield Brook valley connecting the rushy fields (used by Curlews and Lapwing each spring for feeding) below Brook House farm into Hogshaw and the Hogshaw Brook and
 - c. The railway embankments that not only connect to Dove Holes and the centre of the town but also out to the Quarries in the White Peak.

The scale, maturity and complexity of this natural resource makes it irreplaceable. Smaller bits of re-created habitat as mitigation, so called "compensatory measures" associated with a new development are a wholly inadequate substitute.

Local Plan policy EQ 5 Biodiversity emphasises the importance of protecting designated Local Wildlife Sites. It states "The biodiversity and geological resources of the Plan Area and its surroundings will be conserved and where possible enhanced by ensuring that development proposals will not result in significant harm to biodiversity or geodiversity interests." It goes on to say this will be achieved by "Conserving and enhancing regionally and locally designated sites. On these sites the Council will not permit any development proposal which would directly or indirectly result in significant harm to geological and biodiversity conservation interests, unless it can be demonstrated that: there is no appropriate alternative sites available.....". We do not believe that a lack of appropriate alternative sites has been demonstrated with sufficient rigour.



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Policy EQ 8 Green infrastructure. This stresses the importance of conserving wildlife corridors and stepping stones. It states "The Council will, through partnership working, develop, protect and enhance networks of biodiversity and green Infrastructure." It goes on to say it will be achieved by "Identifying and protecting key wildlife corridors and stepping stones that connect sites of importance for biodiversity..."

The geographical juxtaposition of the areas referred to in 1, 2 and 3 means that there is an integrated value to this site which is far greater than if these three things occurred in isolation. Many people use this site as a place to go on our doorstep where we can gain solitude and the many mental and physical benefits of contact with nature.

The fact that so many people signed the Save Hogshaw petition shows just how important these sites and these issues are to the local community.

6. The **large areas of secondary woodland and scrub on the site fulfil several critical ecosystem service benefits.** These are in addition to the wildlife conservation benefits described above.

- a) These areas of mature trees and scrub form a **significant carbon sink**, fixing and tying up carbon. This is particularly important at a time when the government has identified that the planting of new trees is a key way of capturing carbon. It would take many years for new planting to achieve the same impact.
- b) The **extensive root systems have reduced the potential risks from the contaminated materials underneath.** They have bound the site together and ensured that the contaminated materials underneath are not exposed to disturbance.
- c) The wet woodland and scrub adjacent to the streams provide **valuable additional flood protection** for the housing that has been prone to significant flooding at the bottom of Lightwood Road.

7. The large amount of new housing that will follow the sale of these plots of land will lead to **even more congestion on the A6 coming down Fairfield Road into Buxton.** This is already a massive problem for the town. The proposed new housing estates and the associated roundabout will exacerbate it by channelling more vehicles down the hill to the mini roundabouts at the bottom of Fairfield Road.

8. **Fairfield Common is an important historical site with considerable social significance** for the community of the town, having been the site of the Buxton Racecourse and the home for visiting fairs over many years. We urge the Council to carry out an archaeological survey of this land.



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9. The **Fairfield Common** site is a **significant visual gateway to the town** when approaching along the A6. It is adjacent to the Fairfield Conservation Area. At present the experience of the entry to the town from the Golf Course is the historic settlement of Fairfield. It would be tragic if this was obscured or masked by new development.

We are aware of the need to for the Council to fulfil **government housing quotas**, but we are also aware that the Council leaders admitted recently to Robert Largan MP, that **the Council is currently ahead of meeting this quota**. We therefore do not accept that there is an urgent need for this land sale or the associated housing developments.

We have a wider concern that the allocation of another part of Hogshaw for housing in the current Local Plan is inappropriate **in the light of developments since 2016** and should be rescinded as a matter of urgency.

The important developments since 2016 include:

- **The Global Climate Emergency** (as recognised by the many governments, the UK Parliament and High Peak Borough Council amongst many other councils). This highlights the importance of carbon sinks (such as that provided by Hogshaw) and natural wetlands (such as the wet woodland and scrub at Hogshaw) in helping alleviate the increased incidence of flooding in the UK. Climate Emergency statements must to lead to meaningful local action. Hogshaw provides an opportunity for this.
- **The parallel International Biodiversity Crisis** which is at extreme levels here in the UK (see State of Nature Report 2019). It is all very well having policies in the Local Plan to conserve important wildlife habitats including Local Wildlife Sites, wildlife corridors and stepping stones as here at Hogshaw, but when the Council itself plans to destroy one of the best surviving examples of these irreplaceable features, there is a danger that these policies end up looking hollow to developers.
- The increasing scientific, medical and sociological **recognition of the importance of regular contact with nature** for our physical and mental health and general well-being. It is apparent this contact needs to be daily and in people's immediate local environment. See for instance the work of Professor Miles Richardson of University of Derby on the importance of Nature Connectedness.
- **The high usage of natural open spaces through the Covid-19 pandemic** has shown just how important the issue of provision of public open space and contact with nature in the immediate vicinity of our homes is.



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- **The Government Environment Bill** which highlights the increasing importance that must be given to **nature recovery** in the UK, including the crucial importance of **nature recovery networks** provided by wildlife corridors and stepping stones such as those at Hogshaw.
- The 2021 **Dasgupta Review of The Economics of Biodiversity** for the UK Government. Professor Dasgupta said "We need to embed nature into every decision-making unit. No matter who we are, we are eating into nature and not paying the price".

Hogshaw provides a great opportunity for the Council to put the maxim of **"think globally and act locally"** into practice for the benefit of local people, wildlife and the environment.

This is absolutely not an example of people re-acting with a "not in my backyard" response to a proposed development. It is rather an example of the local community coming together to say that these sites are far too valuable as an irreplaceable community resource right in the centre of town as they are at present, to be sacrificed for housing.

We suggest that these two sites provide an opportunity for the Council to capitalise on their remarkable existing qualities and to develop them as even more valuable resources. They could be developed as a community wildlife reserve and outdoor recreational hub. This could provide desperately needed outdoor recreation resources for the teenagers of the town. It could for instance be used to provide a large mountain biking track on parts of the site that are the less valuable for wildlife.

The fact that almost a quarter of the population of Buxton (5,511 people) signed the Save Hogshaw petition shows just how important these sites and these issues are to the local community. It also shows just how popular a more creative approach to the future of these sites could be for the Council.

BCA therefore strongly urges the Council not to sell these two important plots of land and to urgently review and rescind the allocation of Hogshaw for housing. We believe that this case illustrates an urgent need to review the Local Plan in 2021, the possibility of which we know is due to be discussed in the next few weeks.

Yours sincerely,

Peter Phillipson BSc, DipLD, MCIEEM, AAHI

Chair of BCA