



Buxton Civic Association
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Robert Largan MP
Office of Robert Largan MP
18 Market Street
Whaley Bridge
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25th September 2022

Dear Robert,

I am writing on behalf of the Trustees of BCA to object in the strongest possible way to the government's proposals under the Retained EU Laws Bill (the so called "Brexit Freedoms Bill") and for "Investment Zones" in the Mini Budget, so far as they affect the protection of wildlife and the environment in the UK.

These proposals would do away with the Habitat Regulations (which provide protection for our most threatened species) and the Investment Zones would make Special Protection Areas (SPA's - the most important breeding sites for Birds in the UK and Europe) and Special Areas of Conservation (SAC's - protecting the best areas of surviving wildlife habitat in the UK and Europe) meaningless in the face of proposed developments.

These protected sites and the Habitats Regulations are not bits of "European bureaucratic red tape" - they are the essential legal protection for our most important and threatened wildlife species and the habitats and ecosystems that they need to survive in. They are red lines that we just cannot afford to cross. They provide the only meaningful legal checks and balances that exist in this country to try and protect wildlife and our most sensitive environments in the face of relentless pressure from development. Our domestic wildlife legislation - The Wildlife and Countryside Act 1981 is toothless by comparison.

Numerous reports including The State of Nature Report 2019 and The Economics of Biodiversity: The Dasgupta Review have shown how incredibly perilous the state of our wildlife is in this country and how ultimately a healthy environment is crucial for our economic well-being.

As you know BCA is a non-party political organisation that exists to conserve, enhance and celebrate the natural and human environment in and around Buxton. We have c. 750 members.

I must stress that these protected sites are incredibly important for your constituency and the Peak District. For instance, the Dark Peak Special Protection Area protects the best sites for breeding waders including the iconic and desperately threatened Curlew. There is no experience more uplifting than hearing the evocative calls of the curlew over our hills - I long to hear that sound over my garden here in Buxton every spring. Sadly, the reality is that they are hanging on in this area by a perilously thin thread and the SPA is a key element

in helping this. Likewise, the crucial habitats and ecosystems of the Peak District Moors with their incredibly important carbon stores in the blanket bog are also protected by their designation as Special Areas of Conservation. The River Wye running from Buxton to Bakewell and beyond is one of the finest limestone river ecosystems in Europe and is protected as an SAC. The BCA woods in the Wye valley on the edge of Buxton are extensions of the hugely important limestone dale / ravine woodlands of the Peak District - the latter again being protected by SAC designations.

As you will be well aware not all-important wildlife species can be protected just in specially designated sites. Many threatened species such as bats and newts occur on numerous sites potentially threatened by proposed development. This is where the Habitats Regulations are so crucial. It is vital that all proposed developments are subject to rigorous surveys to ascertain whether such species are likely to be affected and if so that measures are taken to either prevent the development or in some other way to safeguard those species. Again, this is not red tape put in place to frustrate development - it is an essential safeguard to protect important and threatened species who otherwise have no way of protecting themselves.

We are also extremely concerned to hear that the proposed Environmental Land Management Scheme payment scheme for farmers (ELMS), that was so carefully planned by Michael Gove and others, is likely to be scrapped in favour of a return to a scheme more like the old area-based payments. The latter have been proved to be extremely inefficient and ineffective. This would be a hugely retrograde step and a massive missed opportunity to encourage farmers to do more creative things for wildlife on their farms. We had for instance been planning to work with DEFRA to explore the possibility of using ELMS to encourage the farmers who have land adjacent to our BCA woods to boost the wildlife value of the BCA woods by creating wildlife rich ecotones next to our woods (the only way we could create these important habitats in our woods would be to fell large strips around the edge of our woods) and to create new blocks of woodland to compliment ours and create much needed new wildlife corridors to connect them up.

These concerns are shared by all the major UK wildlife conservation organisations including The Wildlife Trusts, The National Trust, The Woodland Trust, World Wide Fund for Nature, Wildlife Link and RSPB. I know that locally they are shared by Buxton Field Club and Transition Buxton.

We are aware of your concern about the environment and urge you to do everything you possibly can to object to and reverse these incredibly damaging proposals.

Yours sincerely,

Peter

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