

PROOF OF EVIDENCE

SARAH COX

Proposed Residential Development, Land at Talbot Road, Glossop

Derbyshire County Council

21 July 2026

Carter Jonas

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1. QUALIFICATIONS AND EXPERIENCE

Personal Details

- 1.1 My name is Sarah Cox. I am a Chartered Town Planner and a Member of the Royal Town Planning Institute (MRTPI). I am a Partner at Carter Jonas LLP, based in the firm's Leeds office at 9 Bond Court, Leeds, LS1 2JZ.
- 1.2 I hold an honours degree in Town Planning and am a Group Partner within Carter Jonas LLP's Planning and Development Team.
- 1.3 I have over 20 years' experience as a consultant town planner, together with 26 years' experience working within a Local Planning Authority and client-side roles. This combined experience provides me with a comprehensive understanding of the planning system from both public and private sector perspectives.
- 1.4 Throughout my career, I have advised on a wide range of planning matters across England, Wales and Scotland, including residential-led regeneration schemes, education developments, and brownfield redevelopment proposals. I have acted on behalf of both public and private sector clients and have extensive experience in the preparation and presentation of evidence at public inquiries.
- 1.5 I have been involved in a broad range of planning applications, appeals, development plan examinations, and public inquiries. I currently act for a diverse range of clients. My CV is attached at **Appendix 1**.
- 1.6 This Proof of Evidence ("PoE") has been prepared in accordance with the Town and Country Planning (Inquiries Procedure) (England) Rules 2000 (SI 2000/1624).

Statement of Truth

- 1.7 I am instructed in this case to provide expert town planning evidence and can confirm that my evidence to this inquiry has been prepared and is given in accordance with the guidance of my professional institution. I also confirm that the opinions expressed are my true and professional opinions.

2. INTRODUCTION

- 2.1 I appear at this Inquiry on behalf of Derbyshire County Council (hereafter referred to as the “Appellant”) in respect of an appeal made following the refusal of planning application reference HPK/2024/0481 (hereafter referred to as the “Application”) by High Peak Borough Council (hereafter referred to as the “Council”).
- 2.2 The appeal relates to land at the former Glossopdale Community College Lower Site, Talbot Road, Glossop, Derbyshire, SK13 7DR (the “Site”).
- 2.3 The description of development, is:
- “Outline planning application for the construction of up to 100 dwellings, with all matters reserved (except for the principal points of access), including all associated ancillary works and engineering operations.”*
- 2.4 The planning application was submitted to the Council, as Local Planning Authority, on 21st November 2024 **[CD 1]**. The application was subsequently validated on 7th January 2025 **[CD 15.3]**
- 2.5 The application was reported to the Council's Planning Committee, on 8th September 2025 (see the committee report at **[CD 4.1]**). At the meeting there was a proposal from a member of the committee that the application should be refused for the reasons set out in the officer's report. After a long debate, the members voted to accept that recommendation. That proposal was seconded and the resolution was carried.
- 2.6 The decision notice was issued on 12th September 2025. The Council refused the application for two reasons [see decision notice **CD 4.3**]
- 2.7 The appellant lodged its appeal against the Council's decision on 6th March 2026 under section 78 of the Town and Country Planning Act 1990 and requested a public inquiry. The appeal was given the Inspectorate Reference 6006040.

Scope of My Evidence

- 2.8 In this Proof of Evidence, I address the matters arising from the Council's reasons for refusal. In particular, I deal with the alleged loss of playing field land (Reason for Refusal 1), quantum of development (Reason for Refusal 2), planning balance and the proposed planning obligations and conditions.
- 2.9 In addition, I respond to the case advanced by the Council where relevant, and have regard to the evidence of other witnesses insofar as it relates to the matters within my remit.
- 2.10 Finally, I consider the overall planning balance and set out my conclusions as to where that balance lies in this case.
- 2.11 The Appellant's other witnesses are as follows:

NAME	CONTACT DETAILS	DISCIPLINE
Allen Shepherd Head of Estates Corporate Property	Allen.Shepherd@derbyshire.gov.uk	Derbyshire County Council
Charles Crawford Director	LDA Design Charles.Crawford@lda-design.co.uk	Design Consultant
Neil Allen Director	Sports Planning Consultants neil@sportsplanningconsultants.co.uk	Sports Consultant
Stella Rixon Director	STRI Stella.Rixon@strigroup.com	Agronomic Consultant
Richard Holliday Associate Partner	Carter Jonas LLP Richard.holliday@carterjonas.co.uk	Planning Consultant (Five-Year Housing Land supply)

The Inspector's Main Issues

- 2.12 Following the Case Management Conference held on 12th June 2026 [Inspector's pre note provided at **CD 12.2** & Inspector's summary provided at **CD 12.3** respectively], the Inspector confirmed that the main issues in this appeal were as follows:
- The effect of the proposal on the provision of playing field land (this was refined during the CMC from the broader issue of recreational facilities to focus specifically on the loss and replacement of playing field land.)
 - Whether a high-quality design can be achieved;
 - Housing land supply;
 - Housing delivery; and
 - Progress on the emerging development plan.
- 2.13 I address each of these 'main issues' and the Council's reasons for refusal in Section 5 of this Proof of Evidence.
- 2.14 Other matters raised by interested parties will also be addressed, although these are not currently identified as principal issues. The Appellant has provided technical notes which accompany my Proof of Evidence on:
- Heritage (**Appendix 2**)
 - Transport (**Appendix 3**)
 - Ecology (**Appendix 4**)
 - Drainage (**Appendix 5**)

Statements of Common Ground

- 2.15 The Appellant and the Council have agreed statements of common ground covering the following matters:
- Planning Balance [CD 12.8]
 - Playing Field [CD 12.9]
 - Five-year housing land supply [CD 12.10]
- 2.16 In this Proof of Evidence, I do not repeat matters that are addressed within the Statement(s) of Common Ground. Instead, I draw upon those documents as and where relevant.

Section 106 Agreement and Unilateral Undertaking

- 2.17 At the time of preparing this Proof of Evidence, the Council and the Appellant remain in discussions regarding the terms of a Section 106 planning obligation.
- 2.18 It is anticipated that the obligation will address the following matters:
- Education provision
 - NHS contributions
 - Sports provision (new residents)
- 2.19 I refer to these provisions individually in the appropriate sections below. There is also a separate unilateral undertaking, which covers other benefits of the scheme over and above those provisions that are directly required to mitigate the impact of the development.

Planning Conditions

- 2.20 At the time of preparing this Proof of Evidence, the Council and the Appellant were in discussions regarding the proposed planning conditions.

3. THE APPEAL SITE, ITS SURROUNDINGS AND RELEVANT PLANNING HISTORY

- 3.1 The site lies north of Glossop town centre and extends to approximately 4.78 hectares. It comprises previously developed land with existing access from Talbot Road and North Road. The site is currently derelict and previously accommodated the Glossopdale Community College prior to its relocation to another site and the subsequent demolition of the school buildings and external areas.
- 3.2 The site slopes broadly down from north to south, with a plateau across the middle and southern part of the site which previously accommodated hard surfaced outdoor play and sports areas with land around the previous southernmost terrace giving way to more steeply sloped land along the southern and western boundaries.
- 3.3 The site is currently unallocated in the High Peak Local Plan adopted in 2016 **[CD 6.1]**. It is within the settlement boundary of Glossop (the highest tier of the settlement hierarchy) and has no designations nearby. Designations of note are the conservation areas situated to the north west and the east.
- 3.4 The site is surrounded on all sides by established residential streets consisting primarily of two-storey detached, semi-detached and terraced properties. It is located within the defined settlement boundary and benefits from excellent accessibility to local shops, services and amenities, all of which are within convenient walking distance. The Council's Planning Officer expressly acknowledged the site's sustainable credentials at paragraphs 7.12 and 7.107 of the Officer's Report, **[CD 4.1]** confirming that the site occupies a sustainable location for development.

History of Glossopdale Community College's Closure

- 3.5 Derbyshire County Council's estate strategy is set out in more detail within Mr Shepherd's Proof of Evidence **[CD 11.3]**. In October 2014, Derbyshire County Council undertook statutory consultation to consolidate Glossopdale Community College onto a single site at Hadfield. At the time of the consultation, the school was accommodated across the following three sites:
 - Glossopdale School (Hadfield site)
 - Glossopdale Community College (Talbot Road) (the site at issue in this appeal)
 - Talbot House (Sixth Form)
- 3.6 Following that consultation, the existing Glossopdale School site in Hadfield was identified as the most appropriate location for the consolidated school. It benefited from a larger site size, level topography, and capacity for expansion with scope for a replacement school building and sufficient outdoor sports facilities to serve the consolidated school.
- 3.7 In contrast, the Glossopdale Community College (Talbot Road) site (the site in this appeal) was constrained by surrounding residential development, limited on-site facilities, and topography which was unsuitable for outdoor sports provision and substantial school building(s). The Talbot Road and Talbot House sites were therefore identified as surplus to requirements and suitable for disposal.
- 3.8 Prior to the school's consolidation in 2018, the former Glossopdale Community College (Talbot Road) also had access to two off-site sports facilities (although these were not used in full for various reasons):
 - Cemetery Road - Grass playing fields

- Fauvel Road - Grass playing field, redgra surface, tennis courts

Planning History of the Site

- 3.9 In my opinion, the planning history of the appeal site is highly significant because it demonstrates that the proposed redevelopment forms the final stage of a long-established and strategically planned programme undertaken by the Appellant to reorganise educational provision across Glossop. The evidence shows that the closure of the former Glossopdale Community College site was not an isolated event, but part of a wider rationalisation strategy that culminated in the delivery of a modern replacement secondary school campus at Hadfield.
- 3.10 The statutory consultation undertaken by the Appellant in 2014 considered the future of the three-site Glossopdale School estate. Following that process, the Hadfield site was identified as the most appropriate location for the consolidated school due to its greater capacity, level topography and ability to accommodate modern educational and sporting facilities. By contrast, the Talbot Road site was recognised as constrained by its surrounding residential context, challenging levels and limited opportunities for expansion. Consequently, Talbot Road and Talbot House were identified as surplus to operational requirements.
- 3.11 The subsequent planning history demonstrates the implementation of that strategy. Planning permission was granted for the replacement Glossopdale School at Hadfield in 2016 **[CD 15.4]**, providing a substantially enhanced educational environment together with new and improved indoor and outdoor sports facilities. Further permissions have subsequently secured additional educational accommodation, sports infrastructure and associated improvements at the replacement campus **[CD 15.5]**.
- 3.12 The evidence also demonstrates that the consolidation strategy was accompanied by a wider programme of sports reprovision and enhancement. Facilities previously associated with the former school estate have been replaced and, in many respects, improved through investment at the replacement school and other locations within Glossop. Of particular relevance is the redevelopment of the Cemetery Road facility which delivered a floodlit 3G pitch, grass pitches and supporting infrastructure, thereby providing significant qualitative improvements to sports provision in the locality [committee report provided as **CD 15.6**].
- 3.13 Importantly, the disposal of the appeal site was anticipated from the outset as an integral component of the school reorganisation project. The Secretary of State's consent under Section 77 of the School Standards and Framework Act 1998 was granted in October 2015 for the disposal of the Site **[CD 8.5]**. That consent was provided on the basis that the capital receipt generated from its sale would contribute towards funding the replacement school and associated sports facilities. The planning and funding strategies were therefore intrinsically linked from an early stage.
- 3.14 Following the relocation of pupils to the replacement school in 2018, the appeal site became permanently redundant to educational requirements. Prior approval for demolition was subsequently granted in 2020 **[CD 8.7-8.8]** (this followed confirmation in 2019 that prior approval was required **[CD 8.9-8.10]**), resulting in the clearance of the former school buildings and associated hard surfaced areas. Those actions further implemented the established strategy and reflect the fact that there has been no realistic prospect of the site returning to educational use for many years.
- 3.15 Drawing these matters together, the planning history demonstrates that:
- the appeal site was identified as surplus to educational requirements as part of a strategic review of school provision;

- replacement (and much improved) educational and sports facilities have already been delivered through the consolidation of Glossopdale School at Hadfield;
- the disposal and redevelopment of the site has been anticipated for more than a decade and forms part of the approved funding strategy for the replacement school; and
- there is no realistic prospect of the site returning to its former educational function, having regard to the permanent relocation of pupils, the provision of replacement facilities, the Section 77 consent, and the lawful demolition of the former school.

3.16 In my view, the planning history provides compelling evidence that the proposed residential redevelopment is the logical and intended culmination of a long-term programme of public investment, estate rationalisation and sports reprovision. The proposal would bring a vacant, unattractive and redundant brownfield site back into beneficial use whilst enabling the Appellant to realise the capital receipts that have always formed a necessary part of the funding strategy underpinning the replacement Glossopdale School.

Replacement Glossopdale School

3.17 The planning history also provides important context to the First Reason for Refusal concerning the alleged loss of playing field land. In particular, it confirms that following the Secretary of State's approval in October 2015 [CD 11.3] for the disposal of the Talbot Road progress continued regarding the replacement school. On 18th February 2016, an application was submitted for the construction of the replacement Glossopdale School at Hadfield [CD 15.8]. Planning permission was subsequently granted in July 2016 [CD 15.4]. The approved development comprised:

- A replacement community college;
- New sports facilities;
- Additional parking;
- Landscaping works; and
- Demolition of redundant school buildings.

Closure of the Appeal Site

3.18 Between June and September 2018 pupils transferred from the Talbot Road site to the replacement school at Hadfield. Following completion of that relocation, the appeal site ceased operating as an educational facility and became vacant. Any ancillary sporting activities associated with the school (i.e. functionally linked to the primary education use) likewise ceased at that time. The replacement school subsequently opened in September 2018 and consolidated all educational activities previously undertaken across the various Glossopdale sites (including curriculum sports provision). A letter submitted by the planning agent with the planning application detailed this position [CD15.8].

3.19 Importantly, evidence before this Inquiry demonstrates that the replacement school application provided substantially enhanced educational and sporting facilities compared with those available at Talbot Road, including:

- A new four-court sports hall;

- Fitness and activity spaces;
- Multi-use games areas;
- A 3G artificial grass pitch; and
- Improved grass playing field.

3.20 Importantly, these facilities replaced the educational sporting function formerly undertaken at Talbot Road and have been operational for a number of years.

Demolition and Site Clearance

3.21 Following closure of the school, Derbyshire County Council sought prior approval for demolition and site clearance works.

3.22 On 31st July 2020, the Council granted Prior Approval under reference DET/2019/0008 **[CD 8.7]** for the demolition and clearance of the former school buildings, associated structures, car parking areas and hard landscaped surfaces. As confirmed by the approved demolition methodology, these works included the removal of the former hardstanding and outdoor sports/play facilities, including the tarmac courts and redgra surface. The approved remediation strategy comprised the placement of Type 6F2 hardcore derived from the demolition works and did not require the retention, reinstatement or reprovision of any sports pitches or recreational surfaces. The demolition and clearance works were subsequently lawfully implemented in accordance with that approval.

3.23 The approved works extended beyond the removal of buildings and included clearance of associated hard surfaced infrastructure, including former courts and hard landscaped areas that had previously accommodated outdoor recreational activities.

3.24 Notably, the Prior Approval under reference DET/2019/0008 **[CD 8.7]** did not require the retention, reinstatement or reprovision of any outdoor sports, recreation or playing field facilities on the site. The approved demolition methodology made provision for the demolition and clearance works and the subsequent making good of the site, but imposed no requirement for playing pitches, recreational grassed areas or other sports provision to be retained or recreated following completion of those works.

3.25 The Prior Approval was lawfully implemented and demolition and site clearance works were undertaken during 2021. Importantly, the Council now expressly acknowledges in its Statement of Case **[CD 9.1]** that, following the grant of Prior Approval, *“the buildings on the site were removed and the ground made good”* (paragraph 1.5). There is therefore no dispute between the parties that the site clearance and remediation works were carried out pursuant to, and in accordance with, the Prior Approval.

3.26 This is a significant matter in the context of the Council's first reason for refusal. Having granted Prior Approval and accepted the implementation of the approved demolition and remediation works, the Council necessarily accepted the physical removal of the former school infrastructure and associated hard-surfaced areas. At no stage during the Prior Approval process did the Council seek to secure the retention of outdoor sports facilities, require their reinstatement following demolition, or impose any condition requiring replacement provision elsewhere.

3.27 The absence of any such requirement is particularly noteworthy given the Council's current contention that the site should continue to be regarded as protected playing field land. If the Council considered that the continued existence of sports facilities on the site was necessary or essential, it had the

opportunity when determining DET/2019/0008 to require their retention or reinstatement. It did not do so. Instead, the approved remediation strategy contemplated a cleared and remediated site following demolition, ready for redevelopment, a position that was subsequently implemented on the ground and is now accepted by the Council itself.

- 3.28 Accordingly, the factual position is clear: the demolition, clearance and making-good of the site were expressly authorised by the Council, were carried out in accordance with the Prior Approval, and were completed without any requirement for the reprovision of outdoor sports facilities. That planning history forms an important part of the context against which the current appeal and the alleged loss of playing field land must be assessed.
- 3.29 The site has remained cleared and vacant since completion of those works. The former buildings, courts and associated educational infrastructure no longer exist on the ground.
- 3.30 In my opinion, the grant and implementation of the Prior Approval represents a significant consideration in understanding the present condition of the site and provides important context when considering the issue of former sports provision. The Council expressly approved the removal of all the educational buildings, as well as the former hard surfaced sports facilities at the site.

The Council's draft development brief

- 3.31 During the process of site clearance, the Council prepared a draft development brief for the wider former school site (undated) **[CD 6.10]**. However, that document was never formally consulted on, approved or adopted. Further, it proposes an approach which is unrealistic and unreliable in many respects: in particular, as Mr Allen explains [paragraph 2.26 of **CD 11.3**] it is based on an aspirational scheme for which no funding exists (and is not likely to exist in a realistic time period), it does not have the Appellant's agreement as landowner, it is at odds with the Council's wider strategies and, as the appended development appraisal demonstrates, it is fundamentally unviable. Having regard to these matters, as well the passage of time since this draft was promulgated, I consider that it carries very limited planning weight.

Pre-application engagement

- 3.32 In August 2022 Carter Jonas LLP submitted a formal pre-application enquiry on behalf of the appellant seeking the Council's views regarding residential redevelopment of the site. The Council (as Local Planning Authority) issued a response in April 2023 **[CD 4.4]**. Sport England was consulted during the process by the Council owing to the site's historic association with educational sports facilities.
- 3.33 The pre-application process was followed by extensive engagement with the Council prior to submission of the planning application that is now the subject of this appeal.

Planning Application HPK/2024/0481 – The Appeal Scheme

- 3.34 On 21st November 2024 Derbyshire County Council submitted outline planning application HPK/2024/0481 **[CD 1]** seeking planning permission for:

“Outline planning application for the construction of up to 110 dwellings, with all matters reserved (except principal points of access) including all associated ancillary works and engineering operations.”

- 3.35 The application was validated on 7th January 2025 following submission of additional supporting information requested by the Council (as Local Planning Authority) **[CD 1.26-1.31]**.

- 3.36 A comprehensive suite of supporting documents accompanied the application, including planning, design, landscape, heritage, ecology, highways, drainage, ground conditions, arboricultural and biodiversity information **[CD 1]**.
- 3.37 The application was considered by the Council's Development Control Committee on 8th September 2025 **[CD 4.1 & 4.2]** and planning permission was subsequently refused on 12th September 2025 **[CD 4.3]**.

Local Plan Review and Call for Sites

- 3.38 As part of the High Peak Local Plan Review, the appeal site was promoted through the Council's Call for Sites process on 6th February 2025, with the Appellant seeking its allocation for residential development **[CD 8.12]**. This demonstrates the Appellant's continued commitment to bringing the site forward as a sustainable housing site through both the plan-making and development management processes.
- 3.39 Despite the timetable set out in the Council's former Local Development Scheme (LDS) (February 2025), **[CD 6.11]** the Local Plan Review has not progressed beyond the initial engagement stage. At the stage which the planning submission was made, the anticipated Preferred Options and Proposed Submission consultation, was scheduled for Spring and Winter 2025 respectively, which did not take place, highlighting the significant delay in progressing a replacement Local Plan. The most recent LDS published by the Council in March 2026 **[CD 6.12]** (the same day as the appeal submission) now states the Proposed Submission Consultation will take place in Quarter Four 2026.

Conclusions on the planning history

- 3.40 The planning history demonstrates a clear and consistent sequence of events extending over more than a decade. The Secretary of State approved the disposal of the site in 2015 as part of a strategic reorganisation of educational provision. A replacement school and replacement sporting facilities were subsequently approved and delivered. Educational activities ceased at Talbot Road in 2018, and the site has remained vacant since that date. Buildings and former hard surfaced sports facilities were lawfully removed pursuant to a Prior Approval granted by the Council in 2020 [application pack provided as **CD 15.7**] and implemented in 2021.
- 3.41 In my opinion, the planning history demonstrates that the appeal site forms part of a long-established educational rationalisation programme and that the current redevelopment proposals represent the intended and logical final stage of that process. The educational use has been replaced elsewhere, the site has remained vacant (and with a poor appearance) for many years and there is no realistic prospect of the former educational function resuming. These matters are important considerations when assessing the appeal proposals and the weight to be attached to the reasons for refusal.

Amendments to the Appeal Scheme Since Refusal

- 3.42 Since the refusal of planning application HPK/2024/0481, the Appellant has undertaken further design review work and has refined the appeal proposals to respond positively to the Council's concerns regarding the quantum of development and deliverability of the scheme. These amendments are set out within the Appellant's Statement of Case and supporting evidence **[CD 8]**.
- 3.43 The most significant amendment is the reduction in the maximum number of dwellings from up to 110 dwellings to up to 100 dwellings, together with amendments to the Parameter Plan prepared by LDA Design **[CD 8.16]**. These changes include a modest increase in the net developable area from

approximately 3.0ha to 3.03ha and a redistribution of development parcels within the site. These changes further demonstrate the site's ability to accommodate a high-quality residential development.

- 3.44 The Statement of Common Ground **[CD 12.1]** confirms that it is agreed that the application is submitted in outline form, that the detailed layout, housing mix and final number of dwellings will be determined through the reserved matters process and, significantly, that an indicative density of approximately 33 dwellings per hectare is appropriate for the site and local area. The Statement of Common Ground **[CD 12.1]** also records agreement that the site is located within the settlement boundary, occupies a sustainable location and is suitable in principle for residential development.
- 3.45 The appeal is also supported by additional technical evidence which was not before Members when the application was determined. This includes the Agronomy Report **[CD 8.13]** and the sports mitigation and enhancement package prepared in response to the first reason for refusal **[CD 11.5]**. The package includes proposed improvements to sports facilities at Glossopdale School (Hadfield), drainage and pitch enhancements, provision for rugby use and the replacement of former tennis courts at Fauvel Road with a modern MUGA facility. **[CD 15.2]**
- 3.46 Importantly, since the submission of the appeal, the parties have been able to identify a substantial amount of common ground through the Statement of Common Ground process. The Council agrees that the site is located within the settlement boundary, occupies a sustainable location and is suitable for residential development in principle. The parties also agree that the application was submitted in outline form, that detailed matters of layout, housing mix and design will be determined at reserved matters stage, and that an indicative density of approximately 33 dwellings per hectare is appropriate in this location. The Council further agrees that there are no outstanding objections in relation to matters such as highways, accessibility, flood risk, drainage, ecology, biodiversity, landscape, heritage and affordable housing provision. **[CD12.1]**
- 3.47 The extent of common ground now established between the parties is significant. The Statement of Common Ground confirms agreement on a wide range of matters, including the site's sustainable location within the settlement boundary, the acceptability of development in principle, the appropriateness of the proposed density, and the absence of substantive objections in relation to highways, drainage, flood risk, ecology, landscape, heritage and affordable housing. In my view, these areas of agreement reinforce the position that many of the issues raised during the determination of the application could appropriately have been addressed through planning conditions and the reserved matters process, consistent with the nature of an outline application. They also demonstrate that the matters remaining before the Inquiry are comparatively narrow in scope.
- 3.48 The amendments made through the appeal process are modest and do not materially alter the scheme or its underlying planning merits. The appeal proposal remains fundamentally the same development that was before the Council. The reduction in dwelling numbers and the submission of additional supporting evidence should therefore be viewed as refinements intended to provide further confidence and clarity, rather than any acceptance that the reasons for refusal were justified. In my opinion, the application as submitted was supported by sufficient information to demonstrate that an appropriate form of residential development could be accommodated on the site and that the key planning issues could be satisfactorily addressed through the outline planning process and subsequent reserved matters approvals.
- 3.49 Furthermore, the evolution of the Council's position during the application process, particularly in relation to density and quantum, together with the substantial level of agreement subsequently reached between the parties, only strengthens my view that the original application contained sufficient information to enable a favourable planning judgement to be reached.

4. THE PLANNING POLICY FRAMEWORK

Legislation

- 4.1 Section 70(2) of the Town & Country Planning Act 1990 requires that in dealing with an application for planning permission:

“the authority shall have regard to the provisions of the development plan, so far as material to the application.”

- 4.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that:

“If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.”

The National Planning Policy Framework

- 4.3 On 12th December 2024, the Government published an updated version of the National Planning Policy Framework (“the Framework”), which is a material consideration in the determination of the appeal **[CD 5.1]**.
- 4.4 In this section of my Proof of Evidence, I focus on those policies in the Framework that either support the Appellant’s case or are cited in the reasons for refusal. However, I also reserve the right to address additional policies in the Framework, or guidance in the National Planning Policy Guidance (“NPPG”), as may be referred to by the Council’s witnesses in their evidence. **[CD 5.2 - 5.9]**

Achieving sustainable development

- 4.5 Paragraph 7 in the Framework is clear that the purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development and supporting infrastructure.
- 4.6 Paragraph 8 explains that achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways. These objectives are economic, social and environmental.
- 4.7 Paragraph 9 explains that the three interdependent objectives should be delivered through the preparation and implementation of plans and through the application of the policies within the Framework.

The presumption in favour of sustainable development

- 4.8 Paragraph 10 confirms that a presumption in favour of sustainable development is at the heart of the Framework. This “presumption” is then expanded upon in paragraph 11 which for decision making means approving development proposals that accord with an up-to-date development plan without delay; or where there are no relevant development plan policies, or the policies which are most important for determining the application (or appeal) are out of date, granting permission unless:
- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or

- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.
- 4.9 The last part of the last sentence of criterion ii) is a new provision and illustrates the Government's commitment to development in sustainable locations, making full and effective use of land and at the same time championing good design. As I will demonstrate in this Proof of Evidence, this is exactly the approach taken by the Appellant with the Appeal Scheme.
- 4.10 Further support for the Appeal Scheme is provided by paragraph 125(c) of the Framework, which states that planning policies and decisions should *"give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused."* This provision was strengthened as part of the December 2024 revisions to the Framework and establishes a clear policy expectation that suitable brownfield sites should be brought forward for development.
- 4.11 The policy is notable because it goes beyond a general preference for brownfield redevelopment and introduces a positive expectation that proposals should be approved unless they would result in substantial harm. The Appeal Site comprises previously developed land in a sustainable location within the settlement. As demonstrated elsewhere in my evidence, the Appeal Scheme represents an effective and sustainable reuse of a brownfield site and would secure a range of economic, social and environmental benefits. The proposed development would not cause substantial harm for the purposes of this paragraph. Accordingly, paragraph 125(c) provides a further powerful material consideration weighing in favour of the grant of planning permission. In these circumstances, significant weight should be attached to the benefits associated with the redevelopment of the site, particularly its contribution towards housing delivery and the efficient use of previously developed land
- 4.12 Paragraph 14(b) of the NPPF is not applicable. As such, paragraph 14 is incapable of overcoming the presumption in favour of sustainable development in paragraph 11(d).

Transport

- 4.13 Section 9 is entitled, "Promoting sustainable transport", with the paragraphs concentrating on development proposals (paragraphs 115 – 118) putting the focus on sustainable transport modes; safe and suitable access for all users; and cost-effective mitigation for any significant impacts from development.

Achieving well-designed places

- 4.14 Paragraph 131 confirms that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. It states also that good design is a key aspect of sustainable development and key to creating better places in which to live and work.
- 4.15 As Charles Crawford has shown in his design presentation **[CD 11.4]** and as is evident from the Design and Access Statement **[CD 1.24]** and the other design-related material submitted in support of the Appeal Scheme, good design is at the heart of the Appeal Scheme.

- 4.16 The Framework at paragraph 135 c) emphasises the importance of ensuring new developments are sympathetic to local character, including the landscape setting. Paragraph 136 then states that trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change and that existing trees should be retained wherever possible.

Enhancing the Natural Environment (NPPF)

- 4.17 I identify firm policy support under the Framework, so far as the appeal proposal delivers on the national priority of significantly boosting housing supply, and the benefits attributed to securing a genuine mix of tenure and typology in a sustainable site within the highest tier settlement of Glossop.

Planning Practice Guidance

- 4.18 National Planning Practice Guidance (PPG) accompanies the NPPF to provide further guidance for developments across England. While I do not seek to repeat at length all extracts which are material to this case, I note the importance placed within PPG on achieving good design with reference to the National Design Guide (Paragraph: 001 Reference ID: 26-001-20191001), the 'very wide' scope of what can constitute as a material consideration (Paragraph 008 ID: 21b-008-20140306), which I deduce does not include the protection of purely private interests, and the approach for decision-makers in determining the weight to be given to each material consideration as being one of individual planning judgement (Paragraph 009 ID: 21b-009-20140306).

Statutory Development Plan

The Adopted Development Plan

- 4.19 The Appeal Site is located within the administrative area of High Peak Borough Council.
- 4.20 The High Peak Local Plan was adopted on 14th April 2016 **[CD 6.1]** and is now more than five years old. As such, a Local Plan Review is in progress (albeit very delayed).

Supplementary Planning Documents

- 4.21 The key SPDs and related strategies include:
- High Peak Playing Pitch Strategy (PPS) and Action Plan (January 2018) – An updated Open Space Study and Playing Pitch Assessment was undertaken in 2017 **[CD 6.4 & 6.5]**
 - Glossop Design and Place Making Strategy **[CD 6.6]**
 - Residential Design SPD (2005) **[CD 6.7]**
 - High Peak Design Guide SPD (2018) **[CD 6.8]**
 - Developer Contributions SPD – The Council adopted a Developer Contributions SPD on 25 October 2023 **[CD 6.9]**
- 4.22 In the context of the above, it is clear that the presence of these documents accompanying an out-of-date Local Plan is not central to the determination of the appeal. Further, I note (and it is agreed) that the Playing Pitch Strategy and Action Plan **[CD 6.4]** is out of date.

4.23 Overall, as explained below, in my view there is a compelling case for concluding that the Appeal

Emerging Local Plan

4.24 The Local Development Scheme published in February 2025 [CD 6.11] set the following Local Plan timetable:

- Early Engagement – January-March 2023
- Preferred Options Consultation – Spring 2025
- Proposed Submission Consultation – Winter 2025
- Submission of Local Plan – Spring 2026
- Examination – Summer 2026
- Adoption – Autumn 2026

4.25 However, a visit to the Council's website reveals, the Council is significantly delayed in its progress against this timetable. To date, the Council has not progressed beyond the early engagement carried out between January – March 2023. This is a delay of at least three years.

4.26 The most recent LDS published by the Council in March 2026 [CD 6.12] (the same day as the appeal submission) now states the Proposed Submission Consultation will take place in Quarter Four 2026. In so far as I am aware, little or no work has been done to date on the new Plan. It is clear therefore that the Council is going to fail to meet this obligation of its LDS timetable.

4.27 Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) [CD 7.17] requires local planning authorities to review their local plans at least once every five years from the date of adoption. Whilst the Council has undertaken such a review of the High Peak Local Plan, the review concluded that a number of housing strategy policies are out-of-date. Despite that acknowledgement, no updated Local Plan has been adopted. This is despite a significant period of time elapsing (the review was reported to the Council's Executive in June 2022) and despite the clear directive to update the local plan in paragraph 34 of the NPPF. The significance of the review is that it expressly recognises that key housing policies no longer reflect current policy requirements and housing needs; and that a new local plan was required. This materially reduces the weight that should be afforded to those policies in the determination of this appeal.

4.28 I accept that there is nothing in the relevant provisions of the Framework to suggest that a plan being out of date means that all its policies can or should be set aside. Indeed, and to the contrary, the provisions of paragraph 232 specifically contemplate that older policies which are consistent with the Framework should be afforded continuing weight. However, where the Council's own review has identified that key housing strategy policies are out-of-date and no updated plan has been brought forward, that is a strong indication that reduced weight should be attached to those policies when assessing the appeal proposals.

4.29 The Council accepts that the adopted Local Plan is out-of-date, and this is not a matter in dispute. However, it is important that the basis for the acceptance that the adopted Local Plan is out of date are clear. They are:

- The acceptance that the adopted Local Plan does not meet the requirements of the NPPF in relation to the provision of housing land; and
- The Council's inability to demonstrate a sufficient five-year supply of land as confirmed by the Council's latest monitoring records, the assessment in the Officer's Report **[CD 4.1]** and the Appellant's assessment of the Council's Five-Year Housing Land Supply Position as submitted as part of the original application **[CD 1.2]**.

4.30 In relation to the final point, it is relevant to note that the Council has since revised its five-year housing land supply and reduced this figure further **[CD 9.1]** from when the application was determined. The effect of this is the housing land supply position has worsened even further.

4.31 Finally, all of these matters are significant in context. The Council has a significant housing land supply shortfall by its own admission. The Council also accepts that new sites, including greenfield sites, need to be identified to make good that shortfall. However, the identification of such sites is difficult in a constrained Borough (e.g. Green Belt and the National Park). This is particularly so in Glossopdale, as the appended alternatives assessment demonstrates (provided as **Appendix 6**). In these circumstances, it is absolutely essential for the Council to deliver housing on previously developed sites such as in the present case.

5. THE APPELLANT'S CASE

- 5.1 In this section I address the Inspector's 'main issues', which were informed by the reasons for refusal.
- 5.2 In addressing the 'main issues', I will be focusing primarily on planning matters although, where necessary and appropriate, I will also be drawing on the evidence given by the Appellant's other witnesses and commenting on the Statements of Case given by the Council.
- 5.3 I turn now to the Inspector's 'main issues' which, for ease of reference, I address in the order in which they are set out in the Case Management Conference Summary Note dated 12th June 2026. **[CD 12.3]**

Main Issue A): The effect of the proposal on the provision of playing field land

- 5.4 The Inspector's first main issue reflects the first reason for refusal, namely whether the proposed development would result in the unacceptable loss of playing field land contrary to paragraph 104 of the National Planning Policy Framework. The Council's assessment proceeds on the basis that the appeal site (or at least part of it) constitutes existing playing field land and that the proposal therefore results in the loss of a playing field **[CD 9.1]**. That assumption underpins both the Council's reliance on paragraph 104 and the weight attributed to the alleged harm. However, as explained below, that starting point is incorrect.
- 5.5 Paragraph 104 of the Framework provides that:

"Existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, should not be built on unless:

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use."* **[Appendix 1 Committee Report]**

The threshold question – Does the site contain existing playing fields?

- 5.6 The threshold question is therefore whether the appeal proposal would result in the loss of an "existing" open space, sports or recreational facility, including a playing field, within the meaning of paragraph 104. In my opinion, it does not.
- 5.7 The Council's case **[CD 9.1]** is put expressly on the basis that the site (or part thereof) is an existing playing field: see the first reason for refusal (and the Council's agreement to the narrowed first main issue at the CMC). The Council does not allege that the site otherwise falls within the scope of paragraph 104.
- 5.8 Applying the definitions in the glossary of the NPPF (consistent with the DMPO) a playing field only exists if it includes at least one playing pitch (as defined in the DMPO) **[CD 7.8]**.
- 5.9 In this case, it is agreed in the SoCG **[CD 12.1]** that as at the date of the PPS **[CD 6.4]** the site did not contain any playing pitch meeting the definition in the DMPO. That position has not changed since the date of the PPS. On this basis (which is essentially agreed) the site is not playing field for the purposes of paragraph 104 and thus that paragraph is not engaged as alleged by the Council.

- 5.10 Even if, contrary to the agreement now reached by the Council, the site did contain a playing pitch, such that it could have been considered a playing field at some earlier date (which could be no later than 2018), I remain of the view that the site is not an existing playing field for the purposes of paragraph 104 of the NPPF on the basis of the following factors.

Factor 1 - Not in Current Use

- 5.11 The historic use of the appeal site was as part of Glossopdale Community College. Any sporting provision associated with the site was ancillary to the primary educational use and did not operate as an independent sports facility. There was no community use of the site and it was not relied upon by local sports clubs or community organisations. Importantly, the former educational use ceased in 2018 when the school relocated to the replacement Glossopdale School campus in Hadfield. Any ancillary sports use also ceased at that time.
- 5.12 Since that point, the appeal site has remained vacant. The former school buildings have been demolished, the former hard-surfaced sports facilities have been removed and there has been no sporting use of the site for over seven years. The site no longer performs any sporting or recreational function.
- 5.13 In my view, the fact that the site is not currently used for sport or recreation is highly significant. This is not a temporary cessation of activity. The school has permanently relocated, the associated educational use has ceased and there is no ongoing sporting activity taking place on the land.
- 5.14 Consequently, the site cannot reasonably be described as an existing sporting resource serving either educational or community needs.

Factor 2 - Physical Unsuitability for Sporting Use

- 5.15 The evidence of Stella Rixon of STRI [CD11.6] also demonstrates that the site is fundamentally unsuited to the provision of modern playing fields or sports pitches. Ms Rixon concludes that the principal constraints are topographical, agronomic and drainage-related.
- 5.16 In relation to topography, STRI found that the majority of the site's grassed areas exhibit gradients significantly in excess of Sport England's Natural Turf for Sport guidance. [CD 5.23-5.26] The evidence identifies gradients ranging from approximately 1:40 to 1:17 in some areas, compared to Sport England's recommended maximum gradients for playing fields. The only area approaching suitability for sport was the former redgra platform, which had itself been artificially levelled.
- 5.17 STRI also found that the site is characterised by poor drainage conditions. Trial pits, laboratory testing and previous geo-environmental investigations confirmed a clay loam topsoil overlying heavy clay subsoil with very poor permeability. The site exhibited standing water and evidence of prolonged saturation during the site inspection. STRI conclude that, without substantial drainage infrastructure, the land would be incapable of supporting regular winter sports use.
- 5.18 In addition, the northern part of the site now contains extensive demolition material arising from the lawful clearance of the former school, whilst contaminated materials, made ground and buried infrastructure present additional constraints. STRI identify a culvert crossing the site which would require consideration in any future regrading exercise.

- 5.19 Drawing these matters together, Ms Rixon concludes that significant earthworks, excavation, regrading, importation of suitable soils and installation of intensive drainage systems would be required before the site could even begin to function as a sports facility. The costs of such works are estimated to be substantial and potentially in excess of £1.75 million if wider remediation works are required. Importantly, STRI conclude that even such investment would not guarantee a well-performing sports surface in the long term because of the site's inherent physical constraints.
- 5.20 In my opinion, that evidence clearly demonstrates significant constraints arising from the site's steep gradients, poor drainage characteristics, extensive surface irregularities and poor soil composition. In practical terms, substantial engineering and remediation works would be required before any meaningful sporting use could be contemplated.

Factor 3 - Duration Since Last Use

- 5.21 Any educational or sporting use associated with the site ceased in September 2018 following the consolidation of the former Glossopdale sites. Consequently, the site has now been out of use for a considerable period.
- 5.22 In my opinion, the passage of time is material. The site has not functioned as part of a school campus for over seven years and has not provided any sporting benefit during that period. No sporting use has arisen (or even could have arisen) in its place.

Factor 4 - Lawful Removal of Former Facilities

- 5.23 The former school buildings and hard-surfaced sports facilities were lawfully removed pursuant to Prior Approval reference DET/2019/0008. **[CD 8.7]**
- 5.24 Importantly, that approval enabled the demolition and clearance of the former school buildings, associated hardstanding and outdoor sports surfaces. The works were subsequently carried out and the facilities relied upon by the Council as evidence of sporting provision no longer exist.
- 5.25 The current condition of the appeal site is therefore the result of a lawful planning process and not an unauthorised intervention by the Appellant.

Factor 5 - No Realistic Prospect of Future Sporting Use

- 5.26 In addition to the absence of current use, I see no realistic prospect of the site returning to a sporting function in the future. There are two aspects of this: first the lawfulness of the use; and secondly the physical limitations.
- 5.27 As to the first aspect, a primary sports use of the Site would not be lawful. The sports use has only ever been an ancillary use. The only potentially lawful primary use (leaving aside agriculture which is, itself, unrealistic) is an educational use (e.g. the school). Accordingly, for a sports use to occur in the future that educational use must first resume and the sports use must then be ancillary to that resumed educational use (in particular, it must be functionally linked). There is no realistic prospect of that use occurring.
- 5.28 The former educational use ceased in 2018 when all pupils transferred to the replacement Glossopdale School campus. The Secretary of State had already granted consent under Section 77 of the School Standards and Framework Act 1998 for disposal of the site as part of the wider school reorganisation

programme. **[CD 8.5]** The former buildings and associated sports facilities were subsequently demolished pursuant to planning permission and the site has remained vacant ever since.

- 5.29 Mr Allen's evidence **[CD 11.3]** confirms that all former curricular sporting activity has already been relocated to the replacement school campus at Hadfield. New facilities include a high-quality 3G artificial grass pitch, replacement MUGAs, replacement playing fields, a new four-court sports hall, dance studio and fitness suite. The replacement facilities exceed minimum BB103 requirements and provide a significantly enhanced sporting environment for pupils.
- 5.30 Importantly, unlike Talbot Road, the replacement facilities are also available for community use through The Place Community Hub. Consequently, the educational and sporting functions previously associated with Talbot Road have already been re-provided and enhanced elsewhere.
- 5.31 As to the second aspect, the physical limitations identified by STRI **[CD 11.6]** mean that any future sporting use is dependent on very significant financial outlay (just for playing fields) and a likely need for further planning permission. Such a programme of works is entirely unrealistic. This is not the case where cutting the grass and routine maintenance would allow the resumption of the sporting use; to the contrary, such an approach would be entirely ineffectual.

Factor 6 - No Playing Pitches and Limited Historic Sporting Function

- 5.32 It is also important to consider the actual sporting role that the appeal site performed prior to closure. The most relevant evidence in this respect is the High Peak Playing Pitch Strategy Assessment Report (2017) **[CD 6.5]** and High Peak Playing Pitch Strategy and Action Plan (2018) **[CD 6.5]**, both prepared prior to the closure of the school and therefore representing an objective assessment of the facilities whilst they were still operational.
- 5.33 The Playing Pitch Strategy Report **[CD 6.5]** records that the Talbot Road site "does not contain any dedicated playing pitches" and identifies only a poor-quality redgra surface together with generic grassed areas. The Strategy further notes that the site would cease to be utilised once pupils relocated to the replacement Glossopdale School campus. In my opinion, that assessment is significant because it demonstrates that the Council's own evidence base did not regard the site as providing formal pitch provision even when the school remained operational.
- 5.34 Mr Allen's evidence reaches the same conclusion. His review of the historic sporting provision confirms that no formal pitches existed on the grassed areas at Talbot Road and that the outdoor facilities were used solely for curricular purposes ancillary to the educational use. There was no community use of the outdoor sports facilities and no reliance on the site by local clubs or sporting organisations.
- 5.35 The historical position is further examined by Stella Rixon of STRI **[CD 11.6]**. Having reviewed historic aerial photography, topographical survey information and site conditions, Ms Rixon confirms that the majority of the grassed areas could not accommodate formal pitch sports due to their limited size and topography. Physical Education staff formerly based at Glossopdale Community College confirmed to the Appellant's team that formal pitch sports were not played on the grassed areas and that curriculum sporting activity was focused on the redgra surface. Even then, the redgra facility was limited in scale and functionality and was only capable of accommodating a small youth-sized playing area rather than a full-size pitch. The redgra is also not suitable for match play.
- 5.36 Consequently, even before the school closed, the sporting value of the site was limited. The evidence demonstrates that the site did not function as a formal playing field resource and made no meaningful contribution to the supply of community pitch provision within Glossop.

The Council Conflates Grassed Land with Playing Field Land

- 5.37 The Committee Report **[CD 4.1]** states that the development would result in the loss of approximately 2.6 hectares of playing field land. However, the report does not explain why the entire grassed area should properly be regarded as a playing field for the purposes of paragraph 104 of the Framework.
- 5.38 The Council appears to conflate the existence of open grassed land with the existence of an existing playing field. The two are not synonymous. The fact that land is grassed does not automatically mean it functions as a playing field or sports facility attracting protection under paragraph 104.
- 5.39 The Council's own Playing Pitch Strategy Assessment **[CD 6.5]** records that the site contained no dedicated playing pitches. Whilst the report refers descriptively to "playing field land", it simultaneously confirms that formal pitches were absent. The Council has further agreed in this appeal that no playing pitches as defined in the DMPO **[CD 7.8]** were present at the time of the Playing Pitch Strategy (and thus, necessarily, it was not playing field land for the purposes of paragraph 104 of the Framework). However, despite this, the Committee Report **[CD 4.1]** failed to explain why land devoid of dedicated pitches nevertheless constitutes an existing playing field for the purposes of paragraph 104.
- 5.40 The threshold question is not whether one of the exceptions in paragraph 104 applies, but whether the appeal proposal results in the loss of an existing open space, sports or recreational facility in the first place. In my opinion, the Committee Report assumes this conclusion rather than demonstrating it.
- 5.41 The deliberate use of the word "existing" within paragraph 104 is important. The policy is directed towards protecting land which currently performs, or is capable of performing, a sporting or recreational function. It is not expressed as a policy protecting land indefinitely because of a historic sporting association.
- 5.42 Whilst the Committee Report relies heavily upon Sport England's objection **[CD 3.11 & 3.16]**, it contains limited independent analysis as to whether the site constitutes an existing playing field for the purposes of paragraph 104. The report largely assumes the existence of policy conflict rather than demonstrating why paragraph 104 is engaged.

Summary on the threshold question

- 5.43 Drawing these matters together, I do not consider that the appeal proposal results in the loss of an existing playing field for the purposes of paragraph 104. This is both on the basis of the now agreed position with the Council and, independently, my assessment of the factors that I have identified above.
- 5.44 I conclude that the appeal site does not constitute an existing playing field or meaningful sporting resource for the purposes of paragraph 104. Accordingly, paragraph 104 is not engaged.
- 5.45 If the Inspector reaches a different conclusion on that threshold issue, I go on to consider the application of paragraph 104. There are three further reasons for concluding that paragraph 104 is satisfied in the event that it is engaged.

Reason 1 - The Site is clearly surplus to requirements for the purposes of paragraph 104(a) of the NPPF.

- 5.46 If, contrary to my primary position, the Inspector concludes that paragraph 104 of the Framework is engaged, I consider that the requirements of paragraph 104(a) are clearly satisfied because the land is demonstrably surplus to any sporting or recreational requirement.
- 5.47 There are three principal reasons for this conclusion:
- the site is no longer capable of performing a meaningful sporting function owing to its physical condition and inherent constraints;
 - any historic sporting role was ancillary to the former school, which closed and relocated in 2018; and
 - replacement and enhanced sporting facilities have already been provided at Glossopdale School, Hadfield, where all educational sporting needs are now met.
- 5.48 Historically, the appeal site did not operate as an independent sports facility. Its limited sporting use was entirely incidental to the operation of the former school and was restricted to pupils attending that school. The site was never available for community use, was not accessed by local sports clubs and did not function as part of the wider sporting infrastructure serving Glossop.
- 5.49 The evidence demonstrates that the outdoor areas at Talbot Road performed a relatively limited role even when the school remained operational. The former hard-surfaced courts principally served as playground and circulation space for pupils and offered only modest sporting value. Furthermore, the quality of those facilities was poor. That position is reflected in the Playing Pitch Strategy evidence and is reinforced by the evidence of Mr Allen [CD 11.5] and Ms Rixon [CD 11.6].
- 5.50 Importantly, following the relocation of Glossopdale School to Hadfield, all educational sporting activity previously associated with the appeal site was transferred to a significantly enhanced range of facilities. Those facilities include a 3G artificial grass pitch, replacement MUGAs, improved playing fields, a four-court sports hall and associated indoor sporting facilities. There is no dispute that the MUGA provision has already been replaced by equivalent or better facilities, and the evidence demonstrates that educational sporting requirements are now fully accommodated at the replacement school.
- 5.51 The physical condition of the appeal site provides a further and independent reason why the land should be regarded as surplus. As Ms Rixon [CD 11.6] explains, the site is affected by significant topographical, agronomic and drainage constraints. It does not contain usable playing pitches, suffers from poor ground conditions and would require extensive and costly engineering works before any meaningful sporting use could be contemplated. In this respect, I consider the reasoning in *TV Harrison CIC v Leeds City Council* [2022] EWHC 1675 (Admin) [CD 7.18] to be relevant. The poor quality and limited functionality of a site are capable of informing the assessment of whether it is genuinely required for sporting purposes.
- 5.52 I also attach significant weight to the fact that the High Peak Playing Pitch Strategy [CD 6.5] did not identify the appeal site as making a meaningful contribution towards meeting sporting needs within the Borough. The Strategy records that the site did not contain dedicated playing pitches and was not relied upon as part of the community sports network. As such, the site was not contributing towards identified pitch requirements and was not relied upon to meet existing or future community demand.

- 5.53 The proposed development would therefore not reduce the availability of sporting provision for the local community. No community use would be displaced, no local sports club would lose access to facilities, and no educational sporting activity would be affected. The only historic users of the site were pupils of the former school, and their needs have long since been met through the replacement facilities at Hadfield.
- 5.54 Accordingly, the site does not contribute to the supply of playing field land within the local area and its redevelopment would not result in the loss of publicly accessible sports provision. Nor would it affect education-related sports provision, as the needs previously served by the former school have already been accommodated through the enhanced facilities provided at Glossopdale School, Hadfield. The site was not identified within the Playing Pitch Strategy as making a contribution towards meeting local sporting needs. **[CD 6.5]**
- 5.55 Taking these matters together, the Site is therefore clearly surplus to requirements for the purposes of paragraph 104(a) of the Framework.

Reason 2 - in any event, the loss of the Site resulting from the proposed development has already been replaced by equivalent or better provision in terms of quantity and quality in a suitable location for the purposes of paragraph 104(b) of the NPPF.

- 5.56 Even if the Inspector concludes that paragraph 104 of the Framework is engaged, I am satisfied that the requirements of paragraph 104(b) are met because the evidence demonstrates that the sporting provision formerly associated with the appeal site has been replaced through a package of facilities which, when assessed as a whole, provide equivalent or better provision in terms of quantity and quality in suitable locations as part of the consolidation of Glossopdale School. In reaching that conclusion, I rely upon the evidence of Mr Allen **[CD 11.5]** as to the background of sporting provision on the Site and the other school sites.
- 5.57 As Mr Allen explains, the closure of the Talbot Road site formed part of a planned reorganisation of education provision across Glossop, culminating in the creation of the replacement Glossopdale School at Hadfield. The former facilities at Talbot Road ceased to be available following the school reorganisation. However, the sporting activities and educational requirements previously accommodated at the site were transferred to replacement facilities provided at Hadfield.
- 5.58 The evidence demonstrates that all curricular sporting requirements previously served by Talbot Road are now accommodated at Hadfield, where pupils have access to a 3G artificial grass pitch, replacement MUGA provision, improved playing fields, a four-court sports hall and associated indoor sporting facilities. It is clear that these facilities are of materially higher quality than those previously available and provide sufficient sporting provision for the consolidated school. Importantly, the replacement facilities exceed minimum BB103 requirements. Whilst this is not, of itself, determinative of compliance with paragraph 104(b), it provides further evidence of the quality and suitability of the facilities that have been delivered. The educational sporting function previously associated with Talbot Road has therefore already been replaced and enhanced.
- 5.59 The evidence also demonstrates that the benefits extend beyond curriculum provision. Unlike Talbot Road, which did not provide community access to outdoor sports facilities, the replacement facilities at Hadfield are available for community use through The Place Community Hub.
- 5.60 In addition, the lease of Cemetery Road has facilitated substantial investment in community sports provision, including a floodlit 3G pitch, improved grass pitches and supporting facilities **[CD 15.6]**. This has increased opportunities for community access to sporting facilities when compared to the position

that existed at Talbot Road, where there was no community access to the outdoor facilities. Further, the provision of a floodlit 3G pitch directly responds to the Council's Playing Pitch Strategy. **[CD 6.5]**

- 5.61 I have had regard to the judgment in *Bromell v Reading Borough Council*, **[CD 7.9]** which confirms that the assessment under paragraph 104(b) is a matter of planning judgment requiring consideration of both quantity and quality. As confirmed in *Bromell v Reading Borough Council*, the assessment under paragraph 104(b) is a matter of planning judgement requiring consideration of both quantity and quality, allowing one to be weighed against the other where appropriate. Accordingly, the assessment is not limited to a simple comparison of areas of land but requires consideration of the overall package of provision.
- 5.62 In my opinion, the evidence demonstrates that, when the replacement provision is assessed as a whole, the overall package is equivalent or better for the purposes of paragraph 104(b), having regard to both quantity and quality.
- 5.63 The replacement facilities are of substantially higher quality, accommodate the educational uses previously undertaken at Talbot Road, provide capacity that did not previously exist, offer opportunities for community access that were never available at the appeal site and also deliver improvements to meet needs specifically identified in the Playing Pitch Strategy.
- 5.64 Accordingly, having regard to the overall package of sporting provision delivered through the school consolidation programme, I conclude that paragraph 104(b) of the Framework is satisfied. The overall package constitutes equivalent or better provision in suitable and accessible locations. In reaching this conclusion, it is not necessary to rely on the further mitigation package now offered by the Appellant.

Reason 3 - even if the replacement to date is insufficient, further replacement provision is now proposed which is equivalent or better provision in terms of quantity and quality in a suitable location for the purposes of paragraph 104(b) of the NPPF.

- 5.65 Without prejudice to my primary position that paragraph 104 of the Framework is not engaged, and without prejudice to my conclusion that the replacement provision already delivered satisfies paragraph 104(b), I consider that the additional without prejudice package of sports improvements proposed as part of this appeal provides a further and independent basis upon which paragraph 104(b) is satisfied.
- 5.66 In reaching that conclusion, I rely upon the specialist evidence of Mr Allen. **[CD 11.5]** His assessment considers the existing sporting infrastructure within Glossop, the findings of the Playing Pitch Strategy, the needs of Glossopdale School and engagement with relevant sporting organisations and stakeholders. He concludes that the proposed package has been developed to respond to identified sporting needs and opportunities within the local area.
- 5.67 As described by Mr Allen, the proposed enhancement package comprises:
- implementation of the PitchPower recommendations and associated pitch quality improvements at Glossopdale School;
 - drainage improvements and provision of a rugby pitch at Glossopdale School to support both educational and community use; and
 - provision of a new community Multi-Use Games Area at Fauvel Road.
- 5.68 The purpose of the package is not simply to provide additional sports facilities. Rather, it is intended to improve the quality, functionality, capacity and accessibility of sporting provision available to both the

school and the wider community. Mr Allen explains that improvements in pitch quality directly increase the sporting capacity of facilities by enabling greater levels of use to be accommodated. I have no reason to disagree with that specialist assessment.

- 5.69 Mr Allen's evidence **[CD 11.5]** is that the proposed works would create additional football and rugby capacity at Glossopdale School and facilitate community use that is not currently available on those playing fields. He further concludes that the proposed facilities would better align with identified sporting needs than the historic provision associated with Talbot Road.
- 5.70 I also attach weight to the fact that the proposed works are supported by evidence from the school, relevant governing bodies and prospective community users. Mr Allen's evidence demonstrates that the proposed facilities would serve both school and community users, unlike the former facilities at Talbot Road, which did not provide community access to the outdoor sports facilities.
- 5.71 In assessing this issue, I have had regard to the judgment in *Bromell v Reading Borough Council*, **[CD 7.9]** which confirms that the exercise required by paragraph 104(b) is a matter of planning judgment, having regard to both quantity and quality. As confirmed in that judgment, quantity and quality must be considered together as part of an overall assessment. The exercise is therefore not restricted to a simple comparison between areas of land, but requires consideration of the overall package of sporting provision and the benefits it delivers.
- 5.72 Mr Allen concludes that the proposed enhancement package would result in improvements in the quality, functionality, accessibility and sporting capacity of facilities available within Glossop. In reaching my planning judgment, I have relied on that specialist evidence. In my opinion, the proposed package would be locationally appropriate and would provide a targeted and evidence-led enhancement of sporting provision within Glossop. It would improve the quality, accessibility and carrying capacity of facilities available to both educational and community users and would deliver benefits that materially exceed those available at the appeal site at any time. Accordingly, it represents a significant planning benefit and provides a further and independent basis upon which paragraph 104(b) is satisfied.
- 5.73 Accordingly, even if the Inspector were to conclude that the replacement provision already delivered is insufficient to satisfy paragraph 104(b), which is not my position, Mr Allen's evidence **[CD 11.5]** demonstrates that the additional mitigation package would provide further sporting benefits through improvements in quality, capacity, accessibility and community use. Having regard to that evidence, and considering quantity and quality together as required by paragraph 104(b), I conclude that the proposed enhancement package provides a separate and independent basis upon which paragraph 104(b) is satisfied.
- 5.74 In summary, therefore, there are three separate reasons why the appeal proposals comply with paragraph 104 of the Framework. First, paragraph 104 is not engaged. Secondly, the sporting function formerly associated with the appeal site has already been acceptably replaced through the facilities delivered as part of the school consolidation programme across the Appellant's estate. Thirdly, and in any event, the additional enhancement measures proposed through this appeal would deliver further improvements to sporting provision and provide a separate basis on which equivalent or better provision would be secured in suitable locations. Accordingly, paragraph 104(b) would be satisfied even if the Inspector were not to accept my primary position.

Consequence for the Planning Balance

- 5.75 Whilst the implications of paragraph 11(d) are material to this issue, I consider the operation of the planning balance in greater detail under Main Issue C of this proof. There, I examine the correct interpretation of paragraph 11(d), the effect of the associated footnote, and the weight that should properly be afforded to both the alleged harms and the benefits of the proposal within the overall planning balance. This is also relevant to the application of Footnote 9 to paragraph 11(d) of the Framework, which I address further under Main Issue C. Accordingly, the observations above should be read alongside the more detailed analysis set out under Main Issue C.
- 5.76 The Council's assessment does not show that the proposal would result in the loss of a valuable sporting resource. The site has no formal playing pitches, has not been used for sport since the school closed in 2018, has never been available for community use, and currently has no sporting role. The Council's own evidence also confirms that the site contained no dedicated playing pitches and was not counted as part of the Borough's pitch supply.
- 5.77 Ms Rixon's evidence **[CD 11.6]** shows that the site is unsuitable for formal playing pitches because of its steep slopes, drainage issues, soil conditions and layout. Significant engineering works would be needed to create pitches, and their long-term quality would still be uncertain. The site therefore has very limited potential as a sporting resource.
- 5.78 Mr Allen's evidence **[CD 11.5]** shows that the former sporting facilities were linked to the old school and that all sporting activities have moved to the new Glossopdale School campus. Pupils now have access to better facilities, including a 3G pitch, MUGAs, playing fields and a sports hall. These facilities are also available for community use. As a result, the sporting and educational functions of the appeal site have already been replaced and improved elsewhere.
- 5.79 My primary conclusions are (1) paragraph 104 is not engaged; (2) if it is engaged it is satisfied; and (3) if the Inspector concludes that it is not satisfied, any resulting conflict attracts no material weight in the planning balance for the reasons set out below.
- 5.80 In my opinion, paragraph 104 is intended to protect valuable recreational assets that continue to perform, or are realistically capable of performing, an active sporting or community function. It is not intended to sterilise redundant former school land indefinitely where educational use has permanently ceased, the sporting facilities have been lawfully removed, no current sporting activity takes place and there is no realistic prospect of the land functioning as a meaningful sporting resource in the future.
- 5.81 Further, the specific context in this case is a site which has never provided a historic community sporting function, whose former education-related sporting role was fully replaced through the provision of improved facilities at an alternative location, and which now performs no sporting function whatsoever. No formal pitches remain on the site, it contributes no recognised pitch capacity within the Council's evidence base, there is no identified need for further education-related sporting use and there is no realistic prospect of any such use resuming. These are material considerations when assessing both the extent of any policy conflict and the weight to be attributed to it.
- 5.82 Taking these factors together, the absence of any historic community sports use, the undisputed replacement of the former education-related sporting provision, the Council's approval of the demolition and clearance of the site, the substantial passage of time since any sporting use occurred, the absence of any continuing educational need, and the lack of any realistic prospect of sporting use resuming, I consider that the proposal would give rise to no material harm to sport or recreation provision. Accordingly, any conflict with paragraph 104 (which I do not accept in the first place) attracts no material

weight in the planning balance. The practical consequences of redevelopment for sport and recreation provision are negligible. There is no “real world” harm for the purposes of paragraph 104.

- 5.83 The Committee Report **[CD 4.1]** affords substantial weight to the asserted conflict with paragraph 104 on the basis that the site should simply be treated as existing playing field land. In my opinion, that approach does not adequately engage with the evidence relating to the site's historic function, current condition, lack of community use and physical unsuitability for formal sporting provision. Nor does it properly distinguish between the site's former role as part of a school campus and its current status as a vacant, cleared site that no longer performs any sporting function. This materially overstates the weight that should be attributed to any conflict with paragraph 104 in the overall planning balance.
- 5.84 Accordingly, even if the Inspector reaches a different conclusion from mine on the threshold question of whether paragraph 104 is engaged, I consider that the resulting harm would be limited and would need to be weighed against the substantial benefits of the proposal and the wider package of replacement and enhanced sporting provision described by Mr Allen **[CD 11.5]**. The detailed operation of the tilted balance is considered under Main Issue C, but in my opinion the evidence does not justify the decisive weight attributed to playing field considerations by the Council in reaching its decision.

Response to Policies Cited in Reason for Refusal 1

- 5.85 I turn now to address all the policies cited in Reason for Refusal 1. At the outset I note that it is agreed that the “key policies” in respect of the Council's concerns about the loss of playing field land are paragraph 104(b) of the Framework and Policy CF4 of the Local Plan **[CD 6.1]**. I agree that these are the most relevant of those cited in the reason for refusal. Further, as I explain below, it is difficult to discern why the Council considers the other cited development plan policies are breached given they are broader policies, not protection policies in their nature.

Policy S1 – Sustainable Development Principles

- 5.86 Policy S1 **[CD 6.1]** seeks to secure sustainable development by balancing economic, social and environmental objectives. The appeal proposal accords fully with those objectives.
- 5.87 The appeal site comprises previously developed land located wholly within the settlement boundary of Glossop. It occupies a highly sustainable location with convenient access to services, schools, employment opportunities, public transport and community facilities. The Council accepts that the site is sustainably located and suitable in principle for residential development.
- 5.88 The proposal would deliver up to 100 dwellings, including affordable housing, biodiversity net gain, public open space and significant economic investment, whilst securing the redevelopment of a long-vacant and underutilised brownfield site. These are all outcomes which align closely with the objectives of Policy S1.
- 5.89 Importantly, Reason for Refusal 1 does not identify any conflict with the wider sustainability objectives of Policy S1. The sole issue relates to the Council's position regarding the alleged loss of playing field land.
- 5.90 Policy S1 is not a policy focussed on playing field land or requiring protection of playing field land. There is a general reference (per the final bullet point) to: ‘Maintaining and where possible enhancing accessibility to a good range of services and facilities, and ensuring existing infrastructure and services have the capacity to support development when required.’ This is not a “protection” policy like paragraph 104 of the Framework. Thus, even if the Site contained playing fields and they were lost in breach of

paragraph 104 of the Framework (which I do not accept) this would not result in a breach of Policy S1. Rather, a broader judgment is required by Policy S1. Having regard to all of the relevant parts of Policy S1, as well as the final bullet point, I am of the opinion that the policy is satisfied, particularly considering the provision in terms of accessibility and capacity of services to be provided by the proposed development.

- 5.91 Finally and in any event, the proposed development complies with paragraph 104 of the Framework and Policy CF4, thus the proposal also accords with the objectives of Policy S1.

Policy S5 – Glossopdale Sub-Area Strategy

- 5.92 Policy S5 **[CD 6.1]** supports the sustainable growth of Glossopdale and directs development towards suitable sites within the urban area.
- 5.93 The appeal site lies within the Glossop settlement boundary and is surrounded by established residential development. The redevelopment of a vacant former school site for housing represents a sustainable form of urban regeneration consistent with the spatial strategy of the Local Plan.
- 5.94 The proposal would make a meaningful contribution towards housing delivery within one of the Borough's principal settlements and would bring a previously developed site back into productive use.
- 5.95 Any alleged conflict with Policy S5 derives solely from the Council's contention that the development would result in the unacceptable loss of protected sports land. I do not accept that for the reasons explained so on that basis there is policy compliance.
- 5.96 However, again, I do not consider that this is a policy which protects playing field land in the manner that the Council contends.
- 5.97 The only reference to playing fields is in the first bullet point of part 1 of the policy. However, that is concerned with 'protecting and enhancing sites designated for environmental value' under the broader topic of 'promoting and maintaining the distinct identity of the settlements which make up Glossopdale'. There is no conflict with either of these objectives and none is alleged by the Council: there are environmental benefits and it is agreed that there is no harm to the character and appearance of the area.
- 5.98 The final bullet point of part 4 of the policy does refer to 'supporting the provision of indoor and outdoor sports facilities having regard to the councils [sic] Sport and Recreation Strategies'. This is under the heading of 'supporting enhancements to key community services and infrastructure and connectivity to meet the needs of the local population and support growth'. This is not a protection policy like paragraph 104 of the Framework. Further, the proposed development complies with these objectives – even if there is considered to be a loss of playing field land – given the provision made for new residents, as well as the additional without prejudice mitigation package to be provided.

Policy H1 – Location of Housing Development

- 5.99 Policy H1 **[CD 6.1]** supports housing development on suitable sites within defined built-up area boundaries.
- 5.100 There is no dispute that the appeal site is located wholly within the built-up area boundary of Glossop. Nor is there any dispute that residential development is acceptable in principle on the site. The proposal therefore accords directly with the locational strategy established by Policy H1.

5.101 The appeal proposal represents the effective reuse of previously developed land within a sustainable settlement and is entirely consistent with the objectives of Policy H1. The Council's objection is not directed towards the principle of housing development at this location, but solely towards the alleged loss of playing field land.

5.102 It is difficult to see why – even if there is a loss of playing field land – there is any conflict with this policy which is essentially spatial in nature. There is compliance for the reasons I have given.

Policy CF4 – Open Space, Sports and Recreation Facilities

5.103 Policy CF4 **[CD 6.1]** seeks to resist the loss of sports and recreation facilities unless it can be demonstrated that:

- the facility is surplus to requirements;
- equivalent or better replacement provision is provided; or
- alternative provision delivers benefits which outweigh the loss.

5.104 The Appellant's primary position is that there is no existing playing field or sporting facility on the appeal site for the purposes of Policy CF4 or paragraph 104 of the Framework (noting that Policy CF4 should be consistent with the NPPF or otherwise the weight afforded to it must be reduced). I have explained my reasons for this conclusion above.

5.105 However, without prejudice to that primary position, if the Inspector concludes that the site continues to attract protection under Policy CF4 by virtue of its former sporting function, the evidence demonstrates that the policy tests are clearly satisfied on the basis of the additional reasons that I have set out above in respect of paragraph 104(b) of the Framework.

5.106 Accordingly, the proposal satisfies the requirements of Policy CF4.

NPPF Paragraph 104

5.107 The Council's case relies principally upon the assertion that the appeal proposal conflicts with paragraph 104 of the Framework.

5.108 The Appellant's primary position is that paragraph 104 is not engaged. In those circumstances, the proposal would not result in the loss of an existing playing field or existing sporting resource for the purposes of paragraph 104. However, and importantly, the Appellant's case does not depend solely on that conclusion. Without prejudice to the primary position, if the Inspector concludes that paragraph 104 is engaged, the evidence demonstrates compliance with paragraph 104(a) and paragraph 104(b). I have explained my reasoning on these matters above.

Sport England Playing Fields Policy

5.109 The Council also refers to Sport England's Playing Fields Policy. **[CD 5.12]** Whilst that policy is a material consideration, it does not form part of the statutory development plan.

5.110 The policy broadly reflects the same broad issues addressed by paragraph 104 of the Framework and Policy CF4, namely whether playing field land is being lost and whether suitable replacement or mitigation has been provided. In circumstances where there is compliance with those policies then I consider there would also be compliance with Sport's England's Policies. In this regard, I note that sports England's policy is not one of the agreed "key policies" under this reason for refusal.

- 5.111 Any attempt by the Council to rely on the more prescriptive in its approach to replacement or better provision in the Sports England Policy would be misguided in my view. This is inconsistent with the Framework (and the development plan). Such an approach could only carry limited weight at best and would plainly not justify refusal when there is compliance with the other policies that I have addressed above, in particular the Framework.
- 5.112 The Appellant's primary position remains that there is no existing playing field on the appeal site and that the policy is therefore not engaged.
- 5.113 However, if the Inspector reaches a different conclusion on that threshold issue, the evidence demonstrates that the former sporting function has already been replaced through the delivery of enhanced facilities at the replacement Glossopdale School campus and associated sporting infrastructure, together with the further enhancement measures proposed by the Appellant. This complies with Sports England's policy as well.

Overall Conclusion on Reason for Refusal 1

- 5.114 There is significant common ground between the parties. It is agreed that:
- the appeal site lies within the Glossop settlement boundary;
 - the site occupies a sustainable location;
 - residential development is acceptable in principle; and
 - there are no substantive objections in relation to highways, drainage, flood risk, ecology, heritage or accessibility.
- 5.115 The sole substantive issue underlying Reason for Refusal 1 **[CD 4.3]** concerns the alleged loss of playing field land. For the reasons set out above, I conclude that paragraph 104 of the Framework is not engaged because the proposal would not result in the loss of an existing playing field or sporting resource.
- 5.116 In the alternative, and without prejudice to my primary position, I conclude that the site is surplus to requirements and that equivalent or better replacement provision has already been delivered, such that the proposal satisfies paragraph 104(a) and/or paragraph 104(b), together with the requirements of Policy CF4.
- 5.117 Accordingly, there is no consequential conflict with Policies S1, S5, H1 or CF4 of the High Peak Local Plan. There is also compliance with Sports England's Policy (or, alternatively, it cannot be the basis of a refusal). Once the playing field issue is properly resolved, no sound policy basis remains for Reason for Refusal 1.

Main Issue B): Whether a high-quality design can be achieved, including whether the development would provide:

- 5.118 This matter relates to the Council's second reason for refusal. **[CD 4.3]**
- 5.119 The Council's concern is not that the illustrative scheme is itself poorly designed but that insufficient information has been provided to demonstrate that the proposed quantum of development can achieve both high-quality design and acceptable standards of amenity at reserved matters stage. As this is an outline planning application with all matters reserved except access, it is necessary to consider whether

the submitted parameter plans, illustrative material and supporting technical evidence provide sufficient confidence that a policy-compliant scheme can be delivered.

The Nature of an Outline Application

- 5.120 It is important to recognise that this appeal relates to an outline planning application with all matters reserved except access. The purpose of the application is therefore not to secure the detailed design of the development but to establish whether the site is capable of accommodating the proposed scale of residential development within appropriate development parameters.
- 5.121 The Council's second reason for refusal is based upon an alleged absence of information demonstrating that acceptable design and amenity standards can be achieved. In my opinion, that criticism fails to properly recognise the role of parameter plans, illustrative layouts and design principles at outline stage. The question for the Inspector is not whether the detailed design has been finalised, but whether there is sufficient evidence to conclude that a policy-compliant scheme can be delivered through the reserved matters process.
- 5.122 The evidence of Mr Crawford demonstrates precisely that. The revised Parameter Plan, illustrative layout and accompanying levels strategy provide a robust framework showing how development can be accommodated whilst respecting existing landscape features, topography, drainage infrastructure and neighbouring residential properties. **[CD 11.4]**
- 5.123 If the Council genuinely considered that additional information was required to assess design quality, levels, layout or residential amenity, it had ample opportunity during the determination process to seek further information pursuant to its powers under the Development Management Procedure Order. **[CD 7.8]** Indeed, the application remained under consideration for several months and was the subject of ongoing dialogue between officers and the Appellant. The fact that no clear request was made for the type of evidence now relied upon by the Council further undermines the suggestion that the application could not properly be assessed at outline stage.
- 5.124 The Council's second reason for refusal is framed as an alleged lack of information. However, the Council did not identify any specific information which was necessary to determine the application and which was requested but not supplied. Nor did it identify any design standard, amenity requirement or policy test which could not be assessed based on the material submitted. In those circumstances, I attach limited weight to the Council's contention that the application could not properly be determined at outline stage.

Effect of the Council's Evolving Position on Density and Quantum of Development

- 5.125 Throughout the determination process, the Council's position on the appropriate form and scale of development evolved significantly. Initially, the Planning Officer expressed concern that the proposal represented a relatively low-density form of development and did not make efficient use of a sustainable site. However, by the time of committee consideration, the Council had adopted the opposite position, namely that the site was incapable of accommodating the proposed quantum of development. I provide a chronology and summary of the various planning milestones relating to the communication with the planning officer and this is provided the Appellant's Statement of Case **[CD 8.1]** and in my Proof **[Appendix 7]**.
- 5.126 In my view, these are fundamentally different planning judgments. A concern regarding under-utilisation of land necessarily implies that additional development may be capable of being accommodated.

Conversely, a concern that the site cannot accommodate the proposed number of dwellings suggests that the development is excessive and represents an over-intensive form of development.

- 5.127 The Council has not provided a clear explanation as to how or why its assessment changed so fundamentally during the course of the application. Nor is there any evidence of a material change in the scheme, the site circumstances, or the policy context that would reasonably account for such a significant shift in professional opinion.

Failure to Resolve Concerns Through the Application Process

- 5.128 Paragraph 39 of the Framework states that local planning authorities should approach decision making in a positive and creative way and work proactively with applicants to secure developments that improve the economic, social and environmental conditions of an area. The Framework encourages constructive engagement throughout the determination process to resolve issues and secure acceptable forms of development.
- 5.129 Had the Council formed a settled view that the proposed quantum of development was unacceptable, or that additional information was necessary to demonstrate acceptable design quality and residential amenity, it would have been reasonable to expect that concern to have been clearly articulated during the determination process. This would have enabled constructive discussions regarding:
- the nature of the Council's concerns;
 - the level of development considered acceptable;
 - any evidence underpinning that position; and
 - whether amendments could have addressed the issue.
- 5.130 Furthermore, where a Local Planning Authority (the Council in this instance) considers that an application for outline planning permission ought not to be considered separately from all or any of the reserved matters then it can notify the applicant that they are unable to determine it unless further details are submitted, specifying the further details they require: see article 5(3) of the DMPO. **[CD 7.8]** However, despite the now alleged absence of detail and information, the Council did not do so. This omission significantly undermines the now claimed lack of detail and information.
- 5.131 Despite repeated requests for clarification between June and September 2025, the Appellant was not provided with a clear and consistent position regarding the acceptability of the proposed quantum of development until immediately prior to committee consideration. The chronology of correspondence with the planning officer between 6th February and 5th September 2025 is provided as **Appendix 7**.
- 5.132 Nor was any clear request made for the type of design or technical evidence that the Council now suggests was necessary to assess the proposal. The Appellant was therefore denied a meaningful opportunity either to provide additional supporting information or to respond constructively to the Council's concerns before determination.
- 5.133 In those circumstances, the Council's approach is difficult to reconcile with the positive and proactive decision making envisaged by paragraph 39 of the Framework **[CD 5.1]**. Rather than engaging with the Appellant to resolve any perceived deficiencies in the scheme, the concern regarding the site's capacity and the alleged lack of information emerged at a very late stage in the determination process.
- 5.134 The significance of this point should not be underestimated. The Council's second reason for refusal is framed largely around an alleged lack of information demonstrating that acceptable design and amenity standards can be achieved. However, rather than using the tools available to it during the determination

process to seek any additional information it considered necessary, the Council allowed the application to proceed to committee before introducing a fundamentally different concern relating to the site's capacity shortly before determination.

- 5.135 It is also notable that the Council has never identified any specific design standard, separation distance, amenity requirement, landscape constraint, drainage issue or topographical constraint that cannot be satisfied through a reserved matters submission. If such concerns genuinely existed, the Council had the opportunity during the determination process to request additional information or to use the power in article 5(2) of the DMPO. **[CD 7.8]** Instead, the reason for refusal relies on a general assertion that insufficient information had been provided. In my view, that significantly limits the weight that should be attached to the Council's position, particularly in the context of an outline application where detailed design matters are expressly reserved for subsequent approval.

Timing of the Revised Position

- 5.136 The timing of the Council's revised position is particularly relevant. The concern that the site could not accommodate the proposed level of development emerged only shortly before the application was reported to committee and was subsequently incorporated into an additional reason for refusal through the Members' Update published on 5th September 2025 **[CD 4.2]**. As a consequence:
- the Appellant was not afforded a meaningful opportunity to address the concern through revisions to the scheme or the submission of further evidence;
 - no substantive discussions took place regarding an alternative development quantum;
 - the issue was not fully explored through the consultation and determination process; and
 - Members were ultimately asked to consider a reason for refusal that had not been consistently advanced throughout the majority of the application's consideration.

Weight to be Attached to the Council's Conclusions

- 5.137 In my opinion, this inconsistency is relevant to the weight that should be attached to the Council's assessment of density and development quantum. The Inspector may reasonably question:
- whether the Council had reached a settled professional judgment regarding the appropriate density of development on the site;
 - whether the final conclusion was supported by a clear evidential basis;
 - whether sufficient analysis was undertaken to justify the shift in position; and
 - whether the resulting reason for refusal derives from a robust and consistent planning assessment.
- 5.138 The fact that the same proposal was criticised at different stages for both failing to optimise the use of land and subsequently for being unable to accommodate the proposed quantum inevitably reduces confidence in the consistency of the Council's assessment.
- 5.139 The chronology of correspondence demonstrates not only a lack of clarity regarding the LPA's position, but an apparent contradiction in the officer's assessment which ultimately formed part of the reasons for refusal. Again, this can also be seen in addition to the application of Paragraph 11(d) between planning officers within the LPA since and set out in more detail in response to Main Matter C.

Relevance to the Determination of the Appeal

- 5.140 This issue is of considerable importance because it goes directly to the evidential basis of the Council's case on one of the principal matters in dispute. In assessing the weight that should be afforded to the

relevant reason for refusal, it is necessary to consider not only the conclusion ultimately reached by the Council, but also the consistency and robustness of the assessment process that led to that conclusion.

- 5.141 Having reviewed the chronology of the application, the Council did not maintain a clear or consistently articulated position regarding the appropriate quantum of development throughout the determination process. For much of the application period, the concern expressed by officers centred on the proposition that the development failed to make efficient use of a sustainable site and represented a relatively low-density form of development. It was only at a very late stage in the process that the contrary position emerged, namely that the site could not satisfactorily accommodate the proposed scale of development.
- 5.142 In my view, this change in position is significant. The Appellant was not afforded a reasonable opportunity to understand, consider and respond to the revised concern prior to the determination of the application. Nor was there any meaningful opportunity to explore whether amendments to the scheme could have addressed the issue identified by the Council. As a result, the reason for refusal relating to density and development quantum was not derived from a stable and consistently applied planning assessment.
- 5.143 I consider that the Council's conclusions on density and development quantum are materially weakened by the absence of a clear and consistent assessment throughout the determination process. Whilst the Inspector must ultimately reach an independent judgment on the acceptability of the proposed development, I do not consider that significant weight can be attached to the Council's stated concerns on this issue. Rather, only limited weight should be afforded to this reason for refusal, and the matter should instead be determined on the basis of the detailed evidence before the Inquiry.
- 5.144 This inconsistency is material because it calls into question the robustness of the assessment that ultimately informed the reason for refusal. Furthermore, this issue is not an isolated example. As I explain in response to Main Issue C, there is also a broader inconsistency in the Council's recent decision making and in the application of paragraph 11(d) of the Framework by its planning officers. Recent committee reports demonstrate a materially different approach to the assessment of housing proposals in circumstances where the tilted balance is engaged. That wider context reinforces my concern that the assessment of the appeal proposal was not undertaken in a wholly consistent manner.
- 5.145 Taking all of the above into account, it is my opinion that the Council's changing position on density and development quantum materially undermines the weight that can properly be attached to the corresponding reason for refusal.

Mr Crawford's evidence

- 5.146 Mr Crawford's **evidence [CD 11.4]** includes detailed analysis of relationships between existing and proposed dwellings, including cross-sections and levels modelling along the site boundaries. His assessment demonstrates that level changes can be accommodated through an appropriate earthworks strategy and limited retaining structures without resulting in unacceptable overlooking, overbearing impacts, loss of privacy or unacceptable effects upon residential amenity. The evidence further demonstrates that satisfactory separation distances and private amenity areas can be achieved across the development.
- 5.147 Charles Crawford, Director of LDA Design, addresses the Council's second reason for refusal in detail within his Proof of Evidence. Mr Crawford explains that the appeal scheme has been subject to a comprehensive urban design, masterplanning and levels assessment following refusal of the application. His evidence demonstrates that the site can accommodate the proposed development

whilst delivering high-quality design and acceptable standards of amenity through a landscape-led approach to development.

- 5.148 Mr Crawford explains that a revised Parameter Plan has been prepared specifically in response to the concerns underlying the second reason for refusal. The revised parameters were informed by the site's physical constraints and opportunities, including topography, existing trees, drainage requirements, residential context, access arrangements and the alignment of the existing culvert crossing the site. His evidence demonstrates that the revised Parameter Plan has not been driven by a desire to maximise development yield but by a careful analysis of site characteristics and design requirements. **[CD 8.16]**
- 5.149 Working collaboratively with Campbell Reith, Mr Crawford prepared an illustrative layout and supporting earthworks strategy which demonstrate how the site can be developed whilst accommodating significant level changes across the site. His evidence explains that the site was previously engineered and terraced for school use and that a new levels strategy has been developed that:
- ties development into surrounding ground levels;
 - avoids unacceptable impacts upon retained trees;
 - limits gradients on streets and pedestrian routes;
 - minimises the need for retaining structures;
 - accommodates sustainable drainage infrastructure; and
 - maintains appropriate relationships with neighbouring residential properties.
- 5.150 The illustrative layout demonstrates the delivery of approximately 100 dwellings through a form of development that responds positively to the site's constraints and context. Mr Crawford explains that the layout has been structured around retained landscape features and existing vegetation, with all Category B trees retained and the majority of Category C trees incorporated within a comprehensive green infrastructure network. Public open spaces, pedestrian routes, biodiversity enhancements and sustainable drainage features are integrated throughout the scheme and are used positively as placemaking elements rather than residual spaces.
- 5.151 Importantly, Mr Crawford's evidence demonstrates that the proposed development is capable of being delivered using house types and building footprints commonly utilised by national housebuilders. His evidence confirms that the proposed density does not rely upon abnormal development forms or inappropriate design solutions. Rather, the scheme reflects traditional residential development patterns found locally, including the "linear grid" settlement pattern identified within the Residential Design SPD 2005.
- 5.152 In assessing design quality, Mr Crawford tests the illustrative scheme against the National Design Guide, which he identifies as the most appropriate benchmark for assessing design quality at outline stage. His evidence concludes that the scheme responds positively to the ten characteristics of well-designed places, including context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan. He concludes that the illustrative layout demonstrates that a development of the proposed scale can achieve a high standard of design consistent with national guidance and local policy.
- 5.153 Mr Crawford also specifically addresses residential amenity concerns. His assessment confirms that the proposed earthworks strategy, separation distances and site layout are capable of providing acceptable living conditions for future residents whilst safeguarding the amenity of neighbouring occupiers. He concludes that the degree of level difference between existing and proposed development would not

result in unacceptable overlooking, overbearing impacts or loss of privacy and that the proposed relationships are entirely consistent with those typically experienced within residential neighbourhoods.

- 5.154 In policy terms, Mr Crawford undertakes a detailed assessment of Policy EQ6 of the High Peak Local Plan, **[CD 6.1]** the High Peak Design Guide SPD (2018) **[CD 6.8]** , the Residential Design SPD (2005) **[CD 6.7]** and the National Design Guide **[CD 5.11]** . He concludes that the appeal proposal accords with the design and placemaking objectives of these documents insofar as they are relevant to an outline planning application and that there is no evidence to suggest that the site cannot accommodate a policy-compliant development.
- 5.155 Significantly, Mr Crawford's evidence demonstrates that the reduction in development quantum from 110 dwellings to approximately 100 dwellings has been undertaken to provide additional confidence regarding deliverability and design quality, notwithstanding his professional opinion that the site was capable of accommodating the higher number originally proposed. This reinforces the Appellant's commitment to securing a high-quality development rather than seeking to maximise housing numbers at the expense of design quality or residential amenity.
- 5.156 Overall, Mr Crawford concludes that the revised Parameter Plan, illustrative layout and supporting levels strategy demonstrate conclusively that the appeal site can accommodate approximately 100 dwellings whilst achieving a high standard of design, providing attractive and usable public open space, respecting surrounding residential development and delivering acceptable living conditions for both existing and future residents. I agree with that assessment.
- 5.157 Importantly, Mr Crawford's evidence demonstrates not merely that a development of approximately 100 dwellings can physically be accommodated on the site, but that it can be accommodated in a manner which positively responds to the site's opportunities and constraints. The evidence therefore goes beyond demonstrating simple capacity and instead shows how the site can deliver a high-quality residential environment consistent with national and local design objectives.
- 5.158 Mr Crawford's evidence includes detailed analysis of relationships between existing and proposed dwellings, including cross-sections and levels modelling along the site boundaries. His assessment demonstrates that level changes can be accommodated through an appropriate earthworks strategy and limited retaining structures without resulting in unacceptable overlooking, overbearing impacts, loss of privacy or unacceptable effects upon residential amenity. The evidence further demonstrates that satisfactory separation distances and private amenity areas can be achieved across the development.

Compliance with Design and Place-Making Policy

- 5.159 Whilst I have serious concerns regarding the consistency of the Council's assessment of density and development quantum, the appeal must ultimately be determined against the relevant development plan policies and material considerations. In that regard, the evidence before the Inquiry demonstrates that the proposal is capable of delivering a high-quality residential environment which responds appropriately to the characteristics and constraints of the site.
- 5.160 The principal policy basis for the Council's second reason for refusal is Policy EQ6 (Design and Place Making) of the High Peak Local Plan. **[CD 6.1]** Policy EQ6 requires development to be well designed, of a high quality, and to respond positively to both its environment and the challenge of climate change whilst contributing to local distinctiveness and sense of place. It further requires development to achieve a satisfactory relationship with adjacent development and avoid unacceptable effects arising from overlooking, visual intrusion, overbearing impacts or other adverse consequences for residential amenity.

- 5.161 Similar objectives are reflected in Policy S1 (Sustainable Development Principles), which seeks high-quality and inclusive design, effective use of land and development that respects local character, and Policy S5 which promotes the sustainable growth of Glossopdale whilst maintaining the distinct identity of its settlements. These policies are entirely consistent with the design-led objectives of the Framework **[CD 5.1]** and therefore attract full weight.
- 5.162 At the national level, paragraphs 131, 135, 136, 137 and 139 of the Framework **[CD 5.1]** establish that good design is a fundamental component of sustainable development. Development should function well over its lifetime, create attractive and distinctive places, optimise the potential of sites, provide a high standard of amenity for existing and future users, incorporate landscaping and tree planting wherever possible and respond positively to local character.

High Peak Design Guidance and Residential Design SPD

- 5.163 The reason for refusal also refers to the High Peak Design Guide SPD (2018) **[CD 6.8]** and the Residential Design SPD (2005) **[CD 6.7]**. These documents provide guidance on matters such as layout, character, residential amenity, public realm, landscape structure, pedestrian connectivity and the relationship between development and surrounding areas.
- 5.164 The appeal proposals have been informed by precisely those considerations. The illustrative layout demonstrates:
- retention of important landscape features and existing trees;
 - substantial landscaped buffers to neighbouring residential properties;
 - integrated public open space;
 - opportunities for new tree planting and biodiversity enhancement;
 - pedestrian and cycle connectivity;
 - sustainable drainage infrastructure integrated within the green infrastructure network;
 - a hierarchy of streets and spaces capable of creating legible and attractive residential environments; and
 - development parcels capable of accommodating dwellings with appropriate separation distances and private amenity space.
- 5.165 In my view, these principles are entirely consistent with the objectives of the Design Guide SPD **[CD 6.8]** and Residential Design SPD **[CD 6.7]** and demonstrate that the site can accommodate a form of development which would satisfy the Council's adopted design guidance.

Landscape-Led Development and Efficient Use of Land

- 5.166 The Council's concerns also appear inconsistent with national policy relating to the efficient use of land. Paragraphs 123, 124 and 129 of the Framework **[CD 5.1]** require planning decisions to promote the effective use of land, give substantial weight to suitable brownfield land within settlements, and optimise the potential of sites whilst achieving high-quality design.
- 5.167 This site represents a previously developed and highly sustainable urban site within the Glossop settlement boundary. The evidence shows that the proposed development does not seek to maximise dwelling numbers at the expense of quality. Rather, it strikes an appropriate balance between housing delivery, landscape retention, biodiversity enhancement, drainage requirements, residential amenity and placemaking considerations.

- 5.168 The resulting density is entirely comparable with surrounding residential development and reflects the site's significant physical constraints, including level changes, existing tree cover, drainage infrastructure and relationships with adjoining residential properties.
- 5.169 Mr Crawford's assessment against the National Design Guide and Policy EQ6 demonstrates that the proposed density is not only capable of being accommodated on the site but represents an appropriate balance between efficient use of this sustainable brownfield site and the need to provide high-quality placemaking, green infrastructure, residential amenity and biodiversity enhancement.

Residential Amenity

- 5.170 The Council has suggested that acceptable amenity standards may not be achievable. However, no technical evidence has been produced demonstrating specific areas where future reserved matters applications would be incapable of satisfying normal design standards.
- 5.171 The illustrative material before the Inquiry demonstrates that development parcels can be arranged so as to provide satisfactory separation distances, adequate private amenity areas, opportunities for landscaping and acceptable relationships with neighbouring dwellings. The extensive peripheral green infrastructure and open space provision provide further reassurance that future residents and existing occupiers can enjoy a good standard of amenity.
- 5.172 Importantly, the Council has not identified any specific policy requirement that cannot be met. Rather, the objection appears to be based upon speculation that future reserved matters proposals may encounter difficulties. In my view, such concerns are insufficient to justify withholding outline planning permission where credible evidence demonstrates that policy-compliant solutions are capable of being achieved.

Overall Conclusions on Main Issue B

- 5.173 Taking all the above matters together, I conclude that the appeal proposal accords with the relevant development plan and design guidance for the following reasons:
- 5.174 Policy S1 (Sustainable Development Principles): the proposal represents a sustainable form of development which responds appropriately to its context, makes efficient use of land and secures environmental, social and economic benefits
- 5.175 Policy S5 (Settlement Strategy): the development would deliver much-needed housing in a sustainable location adjoining the built-up area of New Mills and would integrate successfully with the existing settlement pattern
- 5.176 Policy EQ6 (Design and Place Making): the scheme would achieve a high-quality, landscape-led form of development which respects local character, responds positively to site constraints, safeguards residential amenity and creates an attractive and legible place
- 5.177 High Peak Design Guide SPD: the proposal reflects the key design principles of the SPD through its response to landscape character, site topography, green infrastructure and the creation of a coherent settlement edge
- 5.178 Residential Design SPD: the development is capable of providing a high standard of residential environment, incorporating appropriate relationships between buildings, adequate private amenity space, and a layout that promotes a safe and attractive living environment

- 5.179 National Planning Policy Framework: the proposal is consistent with the Framework's design objectives by adding to the overall quality of the area, establishing a strong sense of place, optimising the potential of the site and creating a development that is visually attractive, sympathetic to local character and functional over the long term.
- 5.180 It is also notable that the Council has not identified any specific design standard, separation distance, amenity requirement, landscape constraint, drainage constraint or topographical issue that would prevent a policy-compliant scheme from coming forward at reserved matters stage. Rather, the reason for refusal is founded upon a general concern regarding future design quality, notwithstanding the detailed evidence now before the Inquiry demonstrating that these matters can be satisfactorily addressed.
- 5.181 The evidence of Mr Crawford demonstrates that the site is capable of accommodating approximately 100 dwellings through a landscape-led design approach that responds positively to site constraints, topography and surrounding development. The parameter plans and illustrative material provide sufficient confidence that detailed matters relating to layout, appearance, landscaping, scale and amenity can be satisfactorily addressed through the reserved matters process.
- 5.182 Consequently, I do not consider that the Council's second reason for refusal is supported by the evidence. The appeal proposal is capable of delivering a high-quality, attractive and sustainable residential development and should therefore be found acceptable in design and amenity terms.

Other Planning Matters

- 5.183 Other matters relating to the appeal proposal which have been raised by interested parties are covered below:

Environmental benefits

- 5.184 The development is intended to follow a 'lean, clean, green' approach to future-proofing the proposed housing. Whilst there is potential for environmental benefits to arise from this approach, the detailed specification of the homes will be determined by the eventual housebuilder and is therefore not yet known. Given the current level of detail, I consider it appropriate to attribute neutral weight to the environmental benefits of the proposal.

Biodiversity Net Gain

- 5.185 The proposal will not simply avoid harm; it will deliver a significant biodiversity gain.
- 5.186 The development is expected to deliver biodiversity net gain substantially in excess of the statutory minimum requirement, through habitat creation, additional planting, habitat enhancement and long-term ecological management. This represents a material benefit of the scheme.
- 5.187 This benefit is particularly important in the context of a previously developed and largely cleared former school site where much of the land currently provides limited ecological value. The proposals provide an opportunity to create a more diverse and better-managed ecological resource than currently exists, together with long-term management arrangements secured through the planning process.

- 5.188 The ecological evidence demonstrates that development of the site can proceed without unacceptable impacts on protected species or habitats whilst also delivering measurable biodiversity improvements. Consequently, ecology should attract positive rather than neutral weight in the planning balance.

Ecology

- 5.189 A number of interested parties have expressed concerns regarding the potential effects of the proposal on wildlife, including bats, owls, breeding birds and amphibians, together with concerns relating to a seasonally wet area within the site.
- 5.190 The appeal proposals have been informed by this ecological work from the outset of the design process. The surveys identified that the principal ecological value of the site is associated with the boundary vegetation, hedgerows and trees, rather than the previously developed land within the centre of the site, which comprises extensive areas of demolition material, hardstanding and habitats of limited ecological value. These features are proposed to be retained within the Parameters Plan.
- 5.191 The ecological evidence (provided as **Appendix 4**) concludes that there are no significant ecological constraints which would prevent development of the site. Importantly, the ecological assessments found no evidence that the proposal would result in significant adverse effects on designated sites, protected species or priority habitats, provided that the recommended safeguards and mitigation measures are secured through the planning process.
- 5.192 Any detailed tree losses, habitat management measures and compensatory planting requirements will be considered through the reserved matters process and secured by appropriately worded planning conditions and management plans. These are standard ecological measures commonly applied to residential developments and do not represent an unusual or onerous constraint on deliverability.
- 5.193 Importantly, there is no substantive technical disagreement between the parties regarding ecological matters **[CD 12.1]**. Ecology did not form a reason for refusal **[CD 4.3]** and there is no evidence before the Inquiry which demonstrates that unacceptable ecological impacts would arise.
- 5.194 When giving evidence, I would focus on the following simple messages:
- Concerns raised by residents have been reviewed specifically through the Technical Note and addressed point-by-point.
 - Ecology has been assessed by suitably qualified ecologists using recognised industry methodologies and updated survey information.
 - The ecological evidence provides a robust and up-to-date basis for assessment.
 - Ecology is not a reason for refusal and there is no substantive technical dispute concerning ecological effects.
 - Appropriate mitigation, management and enhancement measures can be secured through standard planning conditions.
 - The proposal will deliver measurable biodiversity net gain in excess of statutory requirements.
 - Ecology is therefore not a constraint to development and represents a substantial positive weight in the planning balance.

- 5.195 The strongest planning point is often not that residents are wrong, but that their concerns have been investigated through proportionate survey work and the evidence demonstrates that the development can proceed without unacceptable ecological harm. That is usually the type of reassurance Inspectors are looking for.

Highways

- 5.196 A number of interested parties have expressed concerns regarding the traffic impacts of the proposed development, including increased traffic generation, congestion on the local highway network, the operation of nearby junctions, highway safety, cumulative impacts with other developments, parking pressures and reliance on the private car.
- 5.197 These matters have been assessed in detail through the Transport Assessment submitted with the application **[CD 1.15]** and have been further considered within a dedicated Transport Technical Note (provided as **Appendix 3**) responding to representations made during the appeal process.
- 5.198 Importantly, highway and transportation matters did not form a reason for refusal of the planning application. Derbyshire County Council, in its capacity as Local Highway Authority, reviewed the application and confirmed that the proposal would not result in an unacceptable impact on highway safety and would not give rise to a severe impact on congestion or the operation of the highway network. No objection was raised to the development on transport grounds **[CD 3.4, 3.9 & 3.17]**
- 5.199 Furthermore, following the submission of additional information relating to pedestrian and cycle access arrangements, the Highway Authority confirmed that the proposed access strategy was acceptable and recommended planning conditions relating to the delivery of the access arrangements and implementation of the Residential Travel Plan.
- 5.200 The position of the Highway Authority has subsequently been reflected within the Statement of Common Ground between the Appellant and the Council. The parties agree that the Transport Assessment demonstrates that the site can accommodate the traffic associated with a residential development, that the site is accessible by a range of sustainable transport modes and that there are no highways or transportation matters in dispute between the principal parties.

Traffic Generation and Highway Impact

- 5.201 A recurring concern raised by local residents is that the development would generate excessive traffic and place unacceptable pressure upon the surrounding highway network.
- 5.202 The Transport Assessment **[CD 1.15]** estimated that a development of 110 dwellings would generate approximately 57 two-way vehicle movements during the weekday morning peak hour and approximately 59 two-way vehicle movements during the weekday evening peak hour. These figures were accepted by the Highway Authority.
- 5.203 It is important to place those figures in context. The appeal site formerly accommodated Glossopdale Community College and the Transport Assessment estimated that the previous school use generated approximately 157 two-way vehicle movements during the weekday morning peak period and approximately 44 two-way vehicle movements during the weekday evening peak period. The evidence therefore demonstrates that, in comparison with the site's former lawful use, the proposed development would generate approximately 100 fewer vehicle movements during the morning peak period and only a modest increase during the evening peak period.

- 5.204 The appeal proposal has subsequently been reduced from up to 110 dwellings to up to 100 dwellings. Consequently, the Transport Assessment represents a robust and conservative assessment of the proposal currently before the Inquiry and the actual transport impacts would be lower than those originally assessed.

Congestion and Junction Operation

- 5.205 A number of interested parties have expressed concern regarding existing congestion within Glossop, particularly in relation to Talbot Road, North Road, Fauvel Road, Woodhead Road and nearby junctions.
- 5.206 Whilst I acknowledge that localised congestion occurs within parts of Glossop during peak periods, the relevant planning test is not whether congestion currently exists but whether the development would have an unacceptable impact on highway safety or a severe residual cumulative impact on the operation of the highway network.
- 5.207 The Highway Authority reviewed the Transport Assessment and accepted its conclusions. In doing so, it concluded that the development would not result in a severe residual cumulative impact upon the highway network. Specific concerns regarding the operation of the Talbot Road/Fauvel Road/Woodhead Road junction and the Talbot Road/North Road junction were also considered through the Transport Assessment process and no objection was raised by the Highway Authority.
- 5.208 Consequently, there is no technical evidence before the Inquiry demonstrating that the proposed development would materially affect the operation of those junctions or the wider local highway network.

Cumulative Development Impacts

- 5.209 Concern has also been expressed regarding the cumulative effect of this development when considered alongside other residential developments within Glossop. The Transport Assessment was prepared in accordance with recognised industry guidance and was reviewed by the Highway Authority. The cumulative impacts of development traffic formed part of that review. The Highway Authority concluded that the proposal would not result in a severe residual cumulative impact on the operation of the highway network.
- 5.210 In the absence of any objection from the statutory Highway Authority, I have seen no technical evidence demonstrating that cumulative transport impacts would justify withholding planning permission.

Accessibility and Sustainable Travel

- 5.211 Some interested parties have suggested that future residents would be heavily reliant upon the private car.
- 5.212 The evidence demonstrates that the appeal site occupies a sustainable location within Glossop and benefits from convenient access to a wide range of services, facilities and employment opportunities. Existing bus stops are located immediately adjacent to the site on Talbot Road and are served by regular local bus services. Glossop railway station is also accessible by walking and cycling routes from the site and provides connections to Manchester and the wider rail network.
- 5.213 The development is also supported by a Residential Travel Plan which will be secured through a planning condition. In addition, the Statement of Common Ground **[CD 12.1]** confirms that the site is located in close proximity to services, facilities, public transport and active travel opportunities.

- 5.214 In my opinion, the site's accessibility credentials are strong and reinforce the parties' agreed position that the site represents a sustainable location for development.

Highway Safety and Access Arrangements

- 5.215 A number of interested parties have expressed concern regarding highway safety implications arising from additional traffic movements.
- 5.216 The Transport Assessment **[CD 1.15]** included a review of personal injury collision records for the local highway network. This identified only four recorded personal injury collisions within the study area during the relevant five-year assessment period, none of which were classified as serious or fatal. Importantly, no personal injury collisions were recorded on Talbot Road adjacent to the appeal site.
- 5.217 The Highway Authority reviewed the collision data and access proposals and concluded that there was no evidence that the development would result in an unacceptable impact on highway safety. The proposed access arrangements, visibility splays and access geometry were all accepted by the Highway Authority **[CD 3.17]**. The appeal proposals provide:
- a principal vehicular access from Talbot Road;
 - a pedestrian, cycle and emergency access from North Road; and
 - a pedestrian and cycle access from Talbot Road East.
- 5.218 Rappor Consultants have independently reviewed those arrangements and concluded that they provide a safe, appropriate and functional access strategy for all intended user groups (a copy of this technical is provided in my **Appendix 3**)

Parking

- 5.219 Concerns have also been raised regarding parking provision and the potential for overspill parking on surrounding roads.
- 5.220 As is normally the case with outline applications, detailed parking arrangements will be considered at reserved matters stage. However, the Highway Authority has recommended conditions requiring the provision of vehicle parking, cycle parking and electric vehicle charging infrastructure in accordance with details approved by the Council as Local Planning Authority.
- 5.221 Accordingly, there is no technical evidence demonstrating that unacceptable parking impacts would arise.

Conclusions on Highways

- 5.222 Having reviewed the Transport **Assessment [CD 1.15]** , the Transport Technical Note (**Appendix 3**), the consultation responses and the position of the Highway Authority, I do not consider that highways or transportation matters represent a constraint to development. The evidence demonstrates that:
- highways and transportation were not reasons for refusal;
 - the Highway Authority raised no objection to the proposal;
 - the Transport Assessment assessed a larger scheme than that currently before the Inquiry;
 - the development would not result in an unacceptable impact on highway safety;
 - the development would not give rise to a severe residual cumulative impact on the operation of the highway network;

- the site is accessible by a range of sustainable transport modes;
- the proposed access strategy has been accepted by the Highway Authority; and
- there are no highways or transportation issues in dispute between the Appellant and the Council.

5.223 For those reasons, I conclude that there is no substantive technical evidence before the Inquiry demonstrating that transport considerations justify withholding planning permission. Highways and transportation matters should therefore attract neutral weight in the planning balance and do not represent a constraint to the proposed development.

Drainage Matters

5.224 Flood risk and drainage matters have been comprehensively assessed through the Flood Risk Assessment Drainage Strategy prepared by Adept Consulting Engineers. **[CD 1.12 - 1.14]** During the determination of the application, the Lead Local Flood Authority ("LLFA") requested further information regarding flood risk, surface water management, the existing culverted watercourse and proposed discharge arrangements. **[CD 3.15]** In response, the Flood Risk Assessment and Drainage Strategy were updated and supplemented by additional survey information, including CCTV investigation of the downstream culvert. **[CD 2.16]** . A technical note prepared by Adept Consulting Engineers is also provided in my **Appendix 5**.

5.225 The evidence demonstrates that the LLFA's concerns principally related to matters of detailed drainage design rather than the suitability of the site for development. In particular, the revised submissions addressed:

- existing flood risk affecting properties along the south-western boundary of the site;
- the management of overland flows and natural springs occurring within the site;
- the condition, connectivity and functionality of the existing culverted watercourse;
- the relationship between proposed drainage infrastructure and the culvert levels; and
- contingency discharge arrangements should the culvert ultimately be found unsuitable for use.

5.226 Following consideration of that additional information, the LLFA responded positively to the amended Flood Risk Assessment and conditionally recommended approval of the development. The LLFA did not maintain an objection in principle to the scheme and instead recommended a series of planning conditions requiring further detailed work at reserved matters stage. Those conditions relate to detailed drainage design, assessment of the drainage hierarchy, management of surface water during construction, and further investigation of the existing culverted watercourse.

5.227 In my opinion, the significance of the LLFA's position should not be understated. The statutory body responsible for flood risk and surface water management has concluded that the development is capable of being made acceptable through the use of planning conditions. None of the drainage matters identified by the LLFA resulted in an objection to the principle of development and none formed part of the Council's reasons for refusal.

Existing Flooding Conditions

5.228 A number of local residents have expressed concerns regarding flooding and drainage issues affecting the site and surrounding area. I acknowledge those concerns. However, the technical evidence demonstrates that existing surface water issues are largely a consequence of local topography, overland flow routes, natural spring activity and the condition and connectivity of the existing culverted

watercourse that traverses the site. These are characteristics of the existing site and surrounding area rather than impacts arising from the proposed development.

- 5.229 The amended Flood Risk Assessment specifically acknowledges existing surface water flood risk affecting properties to the south-west of the site and identifies the existing culvert corridor as a key element of the long-term drainage strategy. The evidence indicates that current flood risk is influenced in part by the absence of a maintained and fully functioning connection to the culverted watercourse. Further works and investigation of the culvert have therefore been identified as part of the next stage of the drainage design process.

Benefits of the Proposed Drainage

The proposed development provides an opportunity to improve the existing situation.

- 5.230 The current site does not benefit from a modern sustainable drainage system. By contrast, the proposed development would incorporate a purpose-designed drainage network designed in accordance with current standards and subject to approval by the LLFA. The strategy includes the interception of existing spring and overland flows, attenuation storage and controlled discharge of surface water at restricted greenfield runoff rates.
- 5.231 The evidence demonstrates that surface water runoff from the developed site would be controlled and managed to a significantly greater degree than either the former school development or the site's present unmanaged condition. Existing surface water flows would be intercepted and directed via new drainage infrastructure towards the existing culvert at the south-western low point of the site, thereby reducing the potential for uncontrolled overland flow.
- 5.232 Consequently, the proposal provides an opportunity not merely to avoid increasing flood risk but to improve the management of surface water across the site and assist in addressing existing drainage issues. In my opinion, that represents a material benefit of the development.

Culvert and Outfall Arrangements

- 5.233 The evidence before the Inquiry demonstrates that a viable drainage solution exists.
- 5.234 The preferred strategy utilises the existing culverted watercourse. CCTV surveys have been undertaken and the amended Flood Risk Assessment confirms that the culvert has been traced further downstream, with the available information indicating that the proposed attenuation basin and culvert can operate through gravity discharge. Whilst localised maintenance issues and areas of root ingress have been identified, these are matters capable of further investigation and remediation through the detailed design process.
- 5.235 Importantly, the drainage strategy does not rely solely upon the culvert. The evidence confirms that discussions have taken place with United Utilities regarding an alternative discharge option to the surface water sewer network on Talbot Road. Adept Consulting Engineers have confirmed that a pumping station solution could be accommodated within the south-western corner of the site if ultimately required and that sufficient land has been identified to facilitate such an arrangement.
- 5.236 Accordingly, the technical evidence demonstrates both a preferred drainage solution and a viable contingency solution. In my opinion, this provides a high degree of confidence that an acceptable drainage strategy can be delivered through the reserved matters process.

Conclusions on Drainage

- 5.237 The relevant technical consultees have reviewed the drainage proposals and raised no objection in principle to the development. The remaining matters are detailed design considerations which are appropriately addressed through planning conditions and reserved matters approval.
- 5.238 The evidence demonstrates that:
- Flood risk and drainage did not form a reason for refusal
 - The LLFA has confirmed that the development can proceed subject to standard planning conditions
 - A policy-compliant drainage solution can be delivered on the site
 - Surface water runoff will be controlled to greenfield equivalent rates
 - The proposed drainage strategy is expected to improve the management of surface water compared with the existing situation
 - existing springs, overland flows and surface water pathways can be appropriately managed through detailed design;
 - both a preferred outfall solution and a contingency outfall solution have been identified; and
 - the proposed development provides an opportunity to improve the management of surface water when compared with the existing situation.
- 5.239 The evidence demonstrates that the remaining matters are detailed design issues capable of resolution through planning conditions and the reserved matters process in the usual manner.
- 5.240 Accordingly, drainage and flood risk should attract moderate positive weight in the planning balance and do not represent a constraint to development.

Heritage

- 5.241 Heritage matters are not in dispute between the principal parties. The appeal is supported by a Heritage Assessment prepared by Prospect Archaeology **[CD 1.9]** and the Statement of Common Ground **[CD 12.1]** confirms that the Appellant and the Council agree that the proposed development would result in no harm to designated heritage assets, including nearby conservation areas and listed buildings.
- 5.242 Following refusal of the application, the appeal proposals were amended through a revised Parameters Plan which reduced the maximum number of dwellings from 110 to 100 and revised the disposition of development parcels and landscape buffers. The heritage technical note provided as **Appendix 2** confirms that these amendments do not alter the conclusions of the original Heritage Assessment. The revised scheme would continue to preserve the significance and setting of nearby heritage assets.
- 5.243 A number of interested parties have raised concerns regarding building heights, views towards the Grade II listed Library Bell Tower and the relationship of the development to the Howard Park and St Charles Conservation Areas. These matters have been considered through the heritage evidence. However, neither the Council nor its conservation advisers identify any resulting heritage harm and the agreed position of the parties remains that the proposal would preserve the significance and setting of all designated heritage assets. Accordingly, there is no substantive heritage objection to the appeal proposal.
- 5.244 Having regard to the Heritage Assessment, **[CD 1.9]** the revised Parameters Plan **[CD 8.16]** and the agreed position set out in the Statement of Common Ground **[CD 12.1]**, I conclude that:
- the proposed development would result in no harm to designated heritage assets;

- the revised Parameters Plan does not alter the conclusions of the Heritage Assessment;
- the proposal would preserve the significance and setting of nearby listed buildings and conservation areas; and
- heritage considerations do not represent a constraint to development.

5.245 In planning balance terms, heritage attracts neutral weight

5.246 In relation to the listed bell tower, there is no identified heritage requirement to preserve or create particular public views across the appeal site. The significance of the listed building is not dependent upon views from within the site and the development would not adversely affect its setting or significance. Consequently, the proposal would preserve the significance of the listed building irrespective of whether specific view corridors are incorporated within a future reserved matters scheme.

5.247 Similarly, concerns regarding development in the vicinity of the conservation areas do not translate into heritage harm. The appeal site lies outside the designated areas and the agreed heritage evidence demonstrates that the proposal would preserve their significance and setting. The development would not result in harm to the character, appearance or significance of either conservation area.

5.248 Therefore, heritage considerations do not weigh against the proposal in the planning balance. The evidence before the Inquiry and the agreed position between the parties demonstrate that the proposal complies with relevant heritage policies within the development plan and the Framework.

Main Issue C): Housing land supply, Housing delivery; and progress on the emerging development plan.

C1 - Introduction

5.249 The Inspector's third main issue concerns the Borough's housing land supply position, housing delivery performance and the progress of the emerging Local Plan. These matters form an important part of the policy context against which the appeal must be assessed and are highly material to the operation of the presumption in favour of sustainable development contained within paragraph 11(d) of the National Planning Policy Framework ("the Framework"). **[CD 5.1]**

5.250 It is common ground that High Peak Borough Council cannot currently demonstrate a five-year supply of deliverable housing land and that the adopted High Peak Local Plan is out-of-date for decision making purposes. Accordingly, paragraph 11(d) of the Framework is engaged. It is also agreed that paragraph 11(d)(i) does not apply, such that the focus is on the tilted balance in paragraph 11(d)(ii).

5.251 The appeal would deliver up to 100 dwellings, including affordable housing, on a previously developed site within the defined built-up area boundary of Glossop. The parties agree that the site is sustainably located and suitable in principle for residential development.

5.252 Mr Holliday addresses the Council's housing land supply position in detail **[CD 11.2]**. In this section, I consider the planning implications of the Council's housing land supply shortfall, delays to the emerging Local Plan, the operation of paragraph 11(d) of the Framework and the weight that should be attributed to the housing, affordable housing and sustainability benefits of the appeal proposals

5.253 The appeal also comes forward at a time when progress on the preparation of a replacement Local Plan has stalled significantly. In the absence of an up-to-date plan capable of meeting identified housing

needs, sustainable and deliverable sites such as the Appeal Site assume increased importance, particularly where they accord with the Council's spatial strategy and locational sustainability objectives.

- 5.254 For the reasons set out below, I conclude that these benefits attract very substantial weight in favour of the development and are a significant material consideration in the determination of this appeal.

C2 - The Development Plan is Out-of-Date

- 5.255 The Statement of Common Ground [**CD 12.1**] confirms that High Peak Borough Council is presently unable to demonstrate a five-year supply of deliverable housing land. It is also agreed that, for the purposes of decision taking, the adopted High Peak Local Plan is out-of-date. These matters are therefore not disputed before the Inquiry.
- 5.256 The parties further agree that the Appeal Site lies within the settlement boundary of Glossop, occupies a sustainable location and is suitable in principle for residential development. The appeal therefore does not concern the acceptability of housing development in this location as a matter of principle. Rather, the principal areas of disagreement relate to the Council's concerns regarding the alleged loss of playing field land and the weight to be attributed to the proposal's benefits in the overall planning balance.
- 5.257 In my opinion, this agreed position is significant. It means that the Inquiry is not required to determine whether the Site represents a suitable and sustainable location for housing growth. Those matters are effectively agreed between the parties. The key question is therefore how much weight should be afforded to the substantial housing benefits of the proposal in circumstances where the Council accepts both a housing land supply deficit and the out-of-date status of the development plan.
- 5.258 In practical terms, the effect of this common ground is that the policy context for the appeal is relatively clear. The proposal would deliver up to 100 dwellings on a sustainable brownfield site within the Glossop settlement boundary at a time when the Council cannot demonstrate a five-year housing land supply. These agreed circumstances form the starting point for the assessment of the proposal under paragraph 11(d) of the Framework.

C3 - Paragraph 11(d) Engaged

- 5.259 As set out above, and as agreed between the parties within the Statement of Common Ground, [**CD 12.1**] High Peak Borough Council is presently unable to demonstrate a five-year supply of deliverable housing land. It is also common ground that the adopted High Peak Local Plan is out-of-date for the purposes of decision taking.
- 5.260 The consequence of that agreed position is clear. Paragraph 11(d) of the Framework is engaged and the appeal must therefore be determined through the prism. In so doing, the most important policies are deemed to be out of date. A reduction in weight is required accordingly, although my conclusions are not dependent on that reduction.
- 5.261 Importantly, paragraph 11(d)(ii) is not a neutral balancing exercise. The Framework deliberately imposes a higher threshold for refusal. The question is not whether harm exists, nor whether some conflict with development plan policies arises. Rather, the relevant test is whether the identified adverse impacts are of such significance that they clearly and demonstrably outweigh the benefits of the development when assessed against the Framework as a whole.

- 5.262 In my opinion, that distinction is particularly important in the context of this appeal. The proposal would deliver up to 100 dwellings, including a substantial affordable housing contribution, on a previously developed site located within the settlement boundary of one of the Borough's most sustainable settlements. In circumstances where the Council cannot meet its housing land supply obligations, these benefits attract considerable weight.

Footnote 9 of the Framework

- 5.263 As paragraph 11(d) of the Framework is engaged, it is necessary to consider whether any of the policies referred to in Footnote 9 provide a clear reason for refusing the development. In my view, the proposal complies with those policies.
- 5.264 The Council's only specified conflict concerns paragraph 104 of the Framework. However, this policy is not listed in Footnote 9 of the Framework.
- 5.265 The Council makes a broad allegation under the Second Reason for Refusal of non-compliance with the Framework. Paragraphs 135 and 139 are the only potentially relevant paragraphs under footnote 9. There is compliance with those policies for the reasons that I have already given.
- 5.266 Further, there are other policies in Footnote 9 which the proposed development complies with (and which the Council does not dispute), in particular paragraphs 66, 110, 115 and 129.

Consistency with National Policy Objectives

- 5.267 The operation of paragraph 11(d) must also be considered in the wider context of the Framework's objectives.
- 5.268 The Framework places considerable emphasis on significantly boosting the supply of homes, making effective use of land, prioritising the redevelopment of suitable brownfield sites, securing well-designed places and directing development towards sustainable locations.
- 5.269 The appeal proposal directly aligns with those objectives. The site comprises previously developed land within the Glossop settlement boundary. The parties agree that it occupies a sustainable location and is suitable in principle for residential development. The scheme would contribute towards meeting both market and affordable housing needs whilst making productive use of a long-vacant brownfield site.
- 5.270 These are precisely the types of benefits that the Framework identifies as important considerations when applying the tilted balance.

C4 – Housing Need and Housing Land Supply

The Extent of the Housing Land Supply Shortfall

- 5.271 Detailed evidence concerning the Council's five-year housing land supply position is provided by Mr Holliday and is not repeated in full within this Proof of Evidence. **[CD 11.2]** For present purposes, the critical point is that the Council accepts it cannot demonstrate a deliverable five-year supply of housing land. This is a matter of common ground between the parties. **[CD 12.1 & 12.10]**
- 5.272 The housing land supply shortfall is not simply a technical policy matter. It is tangible evidence that the Borough is not currently identifying or delivering sufficient sites to meet its housing requirements. The consequence is that the supply of new homes is failing to keep pace with need, placing additional

pressure on the existing housing market and increasing the importance of sustainable and deliverable housing opportunities.

- 5.273 The Framework is clear that local planning authorities should identify and maintain a sufficient supply of deliverable housing sites. Where they are unable to do so, the supply of housing becomes a matter of significant public interest and substantial weight should be attached to proposals capable of making a meaningful contribution towards addressing that shortfall.
- 5.274 The significance of housing delivery has been reinforced through recent changes to national policy and the Government's clear commitment to significantly boosting the supply of homes.
- 5.275 The Written Ministerial Statement Building the Homes We Need, published on 12th December 2024, recognised the existence of an "acute and entrenched housing crisis" and confirmed the Government's intention to increase housing delivery throughout England. **[CD 5.19]** The Statement acknowledged that, in areas where local plans are absent, out-of-date or unable to meet housing needs, a greater proportion of housing permissions will inevitably come forward outside the plan-led system.
- 5.276 This national policy context is directly relevant to the present appeal. The Council cannot demonstrate a five-year housing land supply, the adopted development plan is out-of-date, and the emerging Local Plan remains significantly delayed. In these circumstances, proposals which can contribute towards housing delivery assume increased importance.
- 5.277 The appeal proposal would deliver up to 100 dwellings, including a substantial affordable housing contribution, within a sustainable location inside the Glossop settlement boundary.
- 5.278 The site comprises previously developed land and is agreed to be suitable in principle for residential development. It is therefore capable of contributing towards housing supply without requiring the release of countryside, Green Belt land or other highly constrained locations.
- 5.279 Furthermore, the evidence demonstrates that the site is available, deliverable and capable of being developed within a realistic timescale. The proposal therefore represents a genuine opportunity to contribute to housing delivery in the short term rather than a purely theoretical future housing source.

Weight to be Attached to Housing Delivery

- 5.280 The Council's inability to demonstrate a five-year supply of deliverable housing land is a matter of significant importance in this appeal. Even on the Council's figures, the authority is unable to demonstrate half of the required supply and, on Mr Holliday's assessment, the shortfall exceeds 1,800 dwellings. Such a significant deficit materially increases the weight that should be attached to sustainable and deliverable housing proposals.
- 5.281 The importance of housing delivery in circumstances where High Peak cannot demonstrate a five-year housing land supply is illustrated by recent appeal decisions within the Borough. In particular, the Inspector's decision relating to Shire Hill Hospital, Glossop (APP/H1033/W/21/3286543) **[CD 7.4]** provides a useful and directly relevant example of the approach to be taken when assessing the benefits of housing delivery against identified planning harms.
- 5.282 In that case, the Inspector identified that High Peak Borough Council could only demonstrate a 4.79-year housing land supply, equating to a shortfall of 103 dwellings. Notwithstanding that the shortfall was described as "small", the Inspector nevertheless concluded that the delivery of 52 dwellings would make

a considerable contribution towards addressing the identified need and that the absence of a five-year supply engaged the tilted balance under paragraph 11(d) of the Framework. The Inspector stated:

“The Council is not currently able to demonstrate a five-year supply of deliverable housing sites... The provision of housing, shown at 52 dwellings in the indicative layout plan would be a considerable contribution towards meeting the identified need.”

- 5.283 The Inspector subsequently recognised that where a housing land supply shortfall exists, the Framework requires decision makers to balance identified harms against the social and economic benefits of housing delivery through the presumption in favour of sustainable development. He concluded that the housing benefits of the appeal scheme attracted considerable weight because the development would contribute new homes on a previously developed site in a sustainable location.
- 5.284 Of particular relevance to the present appeal is the fact that the housing land supply position in High Peak has worsened since the Shire Hill decision. As set out in this Proof of Evidence and in the evidence of Mr Holliday, the Council's current housing land supply position is significantly lower than that considered by the Inspector in 2022. Furthermore, the Council continues to be delayed in progressing its Local Plan Review, meaning there is no realistic prospect of the identified housing shortfall being addressed through the development plan process in the foreseeable future.
- 5.285 The appeal proposal would deliver up to 100 dwellings, including a substantial affordable housing contribution, within the settlement boundary of Glossop, one of the Borough's most sustainable settlements. In quantitative terms alone, the housing contribution substantially exceeds that considered in the Shire Hill appeal. Given that the Inspector attached considerable weight to the delivery of 52 dwellings at a time when the Council's housing shortfall was less severe, it follows that the delivery of up to 100 dwellings in the current circumstances should attract at least equivalent, and in my opinion greater, weight.
- 5.286 The appeal proposal would deliver up to 100 dwellings, including a substantial affordable housing contribution, within the settlement boundary of Glossop, one of the Borough's most sustainable settlements. In quantitative terms alone, the housing contribution substantially exceeds that considered in the Shire Hill appeal. Given that the Inspector attached considerable weight to the delivery of 52 dwellings at a time when the Council's housing shortfall was less severe, it follows that the delivery of up to 100 dwellings in the current circumstances should attract at least equivalent, and in my opinion greater, weight.
- 5.287 In the present appeal, the site similarly comprises previously developed land located within the Glossop settlement boundary. The parties agree that the site occupies a sustainable location and is suitable in principle for residential development. The proposal would therefore contribute directly towards the Framework's objective of significantly boosting the supply of homes whilst making effective use of brownfield land. These are benefits which attract very substantial weight in the planning balance.
- 5.288 Accordingly, having regard to the Council's acknowledged housing land supply deficit, the continued delay to the emerging Local Plan, the Government's objective of significantly boosting housing delivery, and the reasoning in the Shire Hill Hospital appeal decision, I consider that the delivery of up to 100 dwellings should be afforded very substantial weight in favour of the proposal

Application of Paragraph 11(d) by the Council

- 5.289 In terms of plan-making there remains ongoing delays and no prospects of a new Local Plan being adopted soon. The emerging Plan (when produced and adopted) will in no way address the urgent need

for housing in the area for the foreseeable future. As such, I see no immediate remedy to the very significant shortfall in housing save for the grant of consent on sustainable sites.

- 5.290 The circumstances now facing the Council are not new. I draw many parallels with the recent application presented to members in April 2026 Development Control Committee or the site known as 'Land at Crossings Road, Chapel-le-Frith. This outline application 'Outline application for up to 180 dwellings, public open space and associated works (all matters reserved except access)' (LPA Ref: HEK/2020/0447) [**CD 7.15**].
- 5.291 The officer's approach is firmly rooted in the identified shortfall in five-year housing land supply, which engages paragraph 11(d) of the NPPF and the "tilted balance." Importantly, the officer goes beyond a simple statement that the tilted balance is engaged and demonstrates clear regard to the footnote to paragraph 11(d). The report expressly acknowledges that, even where policies are out-of-date, decision making must still have "particular regard" to key policies directing development to sustainable locations and securing well-designed places and infrastructure.
- 5.292 In doing so, the officer correctly in my opinion treats the footnote as a substantive qualification to the application of the tilted balance rather than a procedural add-on. The footnote requires consideration of whether the proposal would provide a suitable location for development, having regard to factors such as accessibility, the pattern of existing settlement, and the extent to which any adverse effects can be addressed through planning obligations and mitigation measures. By placing these considerations at the centre of the assessment, the officer undertook a proper evaluation of the site's sustainability credentials. This led to the reasoned conclusion that, notwithstanding the site's conflict with settlement boundary policies, its close relationship with the existing built-up area, together with its accessibility to services and facilities, mean that it can reasonably be regarded as a sustainable location for development within the meaning and purpose of the footnote.
- 5.293 In undertaking the planning balance, the officer carefully weighed the adverse effects of the proposal, including the moderate and permanent landscape harm, conflict with elements of the spatial strategy, and pressures on local infrastructure, against the scheme's benefits. Significant weight was attached to the provision of housing, reflecting the Council's acute and acknowledged housing land supply deficit. Importantly, the officer did not treat the identified harms as determinative simply because they gave rise to conflict with development plan policies. Consistent with paragraph 11(d) of the Framework and the accompanying footnote, the relevant question was whether those harms were of such magnitude that they significantly and demonstrably outweighed the benefits of the proposal. Having undertaken that exercise, the officer concluded that the adverse effects were largely localised in nature and either capable of mitigation or management through planning conditions and planning obligations. Accordingly, they did not fundamentally undermine the objectives of sustainable development and were not sufficient to displace the presumption in favour of sustainable development. The clear and unequivocal recommendation was therefore that planning permission should be granted notwithstanding the acknowledged conflict with the development plan.
- 5.294 The significance of this conclusion should not be underestimated. The committee report was prepared only seven months after the refusal of the appeal proposal and on the basis of the same housing land supply position, namely 2.84 years. The material circumstances relevant to the application of the tilted balance had therefore not changed in any meaningful respect. The Council's own professional officers consequently reached the clear conclusion that a proposal involving development beyond the settlement boundary should nevertheless be approved because the severe housing land supply shortfall, when properly assessed through the lens of paragraph 11(d) of the Framework, outweighed the identified policy conflict and other adverse effects.

- 5.295 A second application is also relevant. The application related to Goyt Valley House **[CD 7.14]**, a former 30-bedroom residential care home located on Jubilee Street, New Mills, within the defined built-up area boundary. The proposal sought the conversion, refurbishment and extension of the existing building to provide 17 residential apartments, together with the erection of three dwellinghouses, associated parking, access arrangements, landscaping and other supporting works. The site comprised previously developed land in a predominantly residential area, close to local services, facilities and public transport connections.
- 5.296 The proposed scheme would deliver a total of 20 dwellings through the re-use of a vacant building that had ceased operating as a care home in 2022. The proposal also included environmental enhancements through landscaping, biodiversity net gain measures and the securing of planning obligations relating to affordable housing and local leisure and recreation facilities. The Council's officers concluded that the principle of residential redevelopment was acceptable, recognising both the sustainable location of the site and the evidence demonstrating that the continued use of the building for care purposes was financially unviable.
- 5.297 Following a detailed assessment of all material considerations, the officer recommended approval subject to a Section 106 Agreement. In doing so, the report provides a useful and recent example of the Council's approach to decision taking in circumstances where it was unable to demonstrate a five-year housing land supply and where the tilted balance under paragraph 11(d) of the Framework was engaged.;

Misapplication of the Footnote to Paragraph 11(d)

- 5.298 The approach taken in the above committee reports stands in marked contrast to that adopted in the Development Control Committee report for the appeal scheme **[CD 4.1]**. In my view, this comparison provides compelling evidence that substantial weight should be attributed to the housing benefits of the appeal proposal and that conflict with the development plan is not, in itself, a sufficient basis upon which to withhold planning permission in the face of a significant housing land supply shortfall.
- 5.299 Whilst the committee report for the appeal scheme recites the wording of paragraph 11(d) of the Framework, it does not, in my opinion, undertake a meaningful application of the accompanying footnote. In particular, the assessment fails to engage with the key question of whether the appeal site represents a suitable and sustainable location for development, having regard to its accessibility, relationship to the existing settlement and compliance with the Framework's wider objectives.
- 5.300 Instead, the analysis elevates a single area of policy conflict, namely the loss of the playing field, to a determinative position within the overall planning balance. As a result, the report effectively displaces the tilted balance rather than applying it. The assessment does not properly examine whether the identified harm fundamentally undermines the objectives of sustainable development or whether, when weighed against the significant benefits of housing delivery in the context of an acute housing supply deficit, it is sufficient to significantly and demonstrably outweigh those benefits
- 5.301 This distinction is important because it goes to the heart of how paragraph 11(d) of the Framework is intended to operate. Where the tilted balance is engaged, the decision maker is required to undertake a broad planning judgement that assesses the significance of identified harms against the benefits of the proposal, particularly the delivery of housing in the context of an acknowledged housing land supply deficit. The other committee reports demonstrate that the Council's officers have approached this exercise by considering whether policy conflicts and adverse impacts are of such magnitude that they significantly and demonstrably outweigh the benefits of development. By contrast, the appeal committee

report **[CD 4.1]** effectively treats the identified conflict arising from the loss of the playing field as determinative, without undertaking the same evaluative exercise as to whether that harm is sufficient to outweigh the substantial housing benefits of the scheme.

- 5.302 This is a matter of considerable significance for the Inspector because it calls into question the weight that can properly be attached to the Council's assessment of the planning balance. The issue is not whether the playing field conflict is capable of attracting substantial weight, but whether the report properly applied the Framework by considering that conflict in the context of the tilted balance and the Council's acute housing land supply shortfall. In my view, it did not. Instead, development plan conflict was effectively treated as a reason to disapply the presumption in favour of sustainable development, rather than a factor to be weighed within it.
- 5.303 The result is that the appeal proposal was not assessed in a manner that is consistent either with the approach taken in the Council's other recent committee reports or with the requirements of paragraph 11(d) itself. Consequently, the Inspector should exercise caution before attaching significant weight to the planning balance set out in the committee report and should instead undertake a fresh assessment of the proposal against the Framework's requirement to boost significantly the supply of homes.

C5 - Affordable Housing Supply

- 5.304 In addition to the Borough's acknowledged shortfall in overall housing delivery, there is a persistent and significant unmet need for affordable housing across High Peak.
- 5.305 The Council's own evidence base has consistently identified affordable housing as a key strategic issue. Key Issue 7 of the adopted Local Plan **[CD 6.1]** states that there is a particular need to provide affordable housing across the Borough. Paragraph 5.149 of the Local Plan records that previous housing evidence identified a need for between 443 and 591 affordable dwellings per annum, whilst the 2014 Strategic Housing Market Assessment **[CD 6.29]** identified a net annual need of 526 affordable homes.
- 5.306 More recent evidence confirms that affordable housing need remains substantial. The High Peak Housing and Economic Land Needs Assessment (2022) **[CD 6.2]** identifies a requirement for between 228 and 270 affordable dwellings per annum throughout the period 2021-2041. The Council's Housing Strategy 2025-2030 **[CD 6.13]** similarly identifies increasing the supply of affordable housing as a key priority and records that 1,310 households were registered on Home Options as of January 2024. As noted by Mr Holliday, the Borough Plan 2023-2028 also identifies an annual affordable housing need of between 228 and 270 dwellings. **[CD 11.2]**
- 5.307 The identified need must be considered against actual delivery. Mr Holliday's evidence **[CD 11.2]** demonstrates that only 211 affordable homes were completed during the three-year period 2022/23 to 2024/25. Using the lower end of the identified need range, this compares with a requirement for approximately 684 affordable dwellings over the same period.
- 5.308 Accordingly, affordable housing delivery has been materially below the level of need identified by the Council's own evidence base.
- 5.309 This position is closely linked to the Borough's wider housing land supply circumstances. As Mr Holliday demonstrates, High Peak currently cannot demonstrate a five-year supply of deliverable housing land and the Borough's supply is significantly below the level required by national policy. Given that affordable housing delivery is largely dependent upon the delivery of market housing sites, continued under-delivery of housing inevitably constrains the delivery of affordable homes.

- 5.310 The appeal proposal would make a meaningful contribution toward addressing this identified need. The scheme would provide 30% affordable housing, equating to approximately 30 affordable dwellings. This would represent a significant contribution from a single development and would deliver affordable homes within a sustainable location inside the Glossop settlement boundary.
- 5.311 Whilst the proposal would not address the identified affordable housing need in full, national policy does not require individual schemes to do so. Rather, the relevant consideration is the extent to which the development would contribute towards meeting identified needs. In this case, the proposal would provide a valuable and deliverable source of affordable housing at a time when both market and affordable housing delivery are demonstrably below identified requirements.
- 5.312 In these circumstances and having regard to the evidence of identified need and historic under-delivery, I consider the affordable housing benefits of the proposal attract very substantial weight in the planning balance.

C6 - Glossop as a Sustainable Settlement

- 5.313 Glossop is identified, as set out in the adopted High Peak Local Plan, **[CD 6.1]** as one of the most sustainable settlements within the Borough for the location of new development. It benefits from a strong range of services, facilities and public transport connections, and forms part of the defined built-up area where development is directed in accordance with the spatial strategy.
- 5.314 The significance of the site's location is reflected in the Statement of Common Ground. **[CD 12.1]**
- 5.315 The parties agree that the appeal site is located within the built up area boundary of Glossop, occupies a sustainable location and is suitable in principle for residential development. The Council further accepts that there are no substantive objections relating to matters such as highways, accessibility, flood risk, drainage, ecology, landscape or heritage that would undermine the site's sustainability credentials.
- 5.316 In my opinion, this degree of common ground is highly significant. It means that the suitability of the site's location is not a matter that remains in dispute before the Inquiry. The appeal is therefore fundamentally different from many housing appeals where the principal debate concerns whether development should occur in a particular location at all.
- 5.317 Here, the parties agree that housing development is acceptable in principle on this site and that the site occupies a sustainable location. The remaining issues relate to the weight that should be attributed to other matters within the planning balance.
- 5.318 The Council's own evidence base consistently supports this position, confirming that Glossop is an appropriate and sustainable location for residential growth.
- 5.319 The site is also well served by public transport, with Glossop train station approximately 10 minutes' walk from the site. This locational merit is particularly relevant in light of the Secretary of State's announcement, made on 26th January 2025, **[CD 5.28]** which reaffirmed the Government's commitment to leveraging development opportunities in highly accessible locations. In that statement, the Secretary of State set out the Government's ambition to unlock the Secretary of State's announcement, made on 26th January 2025, which reaffirmed the Government's commitment to leveraging development opportunities in highly accessible locations. In that statement, the Secretary of State set out the Government's ambition to unlock "Untapped land near commuter transport hubs will be unlocked to build

new housing for working people, as part of bold new steps to reform the planning system and unlock growth to deliver win-win outcomes for the country and the economy". The Appeal Site aligns squarely with this policy direction and exemplifies the type of sustainable, well-connected location that national policy now seeks to prioritise for housing delivery.

- 5.320 It should be noted that the site is wholly enclosed with existing tree buffers to the north and east, which will be reinforced by structural landscaping buffer. The Appeal Scheme will be centred to the southwestern corner of the entire site, which is well associated with the neighbouring built up forms along Fauvel Road to the east and North Road to the west.

Future Local Plan Context and Development Potential

- 5.321 Whilst the appeal falls to be determined on its own planning merits, it is relevant to consider the position of the site within the wider context of future plan-making in High Peak.
- 5.322 The Council's preparation of a new Local Plan **[CD 6.12]** remains at an early stage and the Borough is currently unable to demonstrate a five-year supply of deliverable housing land. At some point the Council will inevitably be required to identify additional sustainable and deliverable sites capable of contributing towards its future housing requirement.
- 5.323 In my opinion, the appeal site possesses many of the characteristics ordinarily sought through the plan-making process when assessing potential residential allocations. The site:
- 5.324 Lies within the settlement boundary of Glossop, one of the Borough's most sustainable settlements.
- 5.325 Comprises previously developed land.
- Is surrounded by existing residential development and is well integrated with the urban area.
 - Has existing access opportunities and connections to services, facilities and public transport.
 - Is available for development and in single ownership.
 - Is capable of delivering a meaningful number of homes, including affordable housing.
 - Has been demonstrated through the appeal evidence to be physically capable of accommodating residential development.
- 5.326 By contrast, many alternative opportunities around Glossop are affected by more significant constraints, including Green Belt designation, countryside protection policies, landscape sensitivities, ownership complexities or other deliverability challenges.
- 5.327 The conclusions of the Carter Jonas Development Appraisal Statement (provided as my **Appendix 6**) are highly relevant in this regard. The Appraisal identifies that opportunities for large-scale growth in Glossop are increasingly constrained and concludes that the Talbot Road site compares very favourably with many competing development opportunities due to its scale, relationship to the existing urban area and ability to deliver a meaningful contribution towards future housing needs. The Appraisal further concludes that the site is likely to be one of the stronger candidates for future residential allocation should additional development opportunities be required through the Local Plan process. I agree with that assessment. In my opinion, the appeal site possesses many of the characteristics that local planning authorities seek when identifying preferred housing allocations and would be expected to compare very favourably with alternative sites promoted in and around Glossop.

- 5.328 Consequently, given Glossop's role as a highest settlement tier and a key focus for future growth within the Borough, it is reasonable to expect that additional housing allocations will be required within and around the town through a future Local Plan review. In my opinion, the appeal site would be exceptionally well placed in that exercise. The site comprises previously developed land within the settlement boundary, is available and deliverable, and has the capacity to make a meaningful contribution towards both market and affordable housing needs. When compared against many competing opportunities around Glossop (Appendix 6), the site possesses many of the characteristics typically associated with successful residential allocations and would therefore be expected to represent one of the strongest candidates for future allocation.
- 5.329 In those circumstances, refusing permission for a site which already exhibits many of the characteristics expected of a future housing allocation would delay the delivery of much-needed market and affordable housing, notwithstanding the site's clear suitability for residential redevelopment.

C7 - Relevant Appeal Decisions and Consistency of Decision Making

- 5.330 Whilst every planning application and appeal must be determined on its own merits, previous appeal decisions and recent decisions of the Council provide useful context when considering the weight that should be attributed to housing delivery and the operation of paragraph 11(d) of the Framework.
- 5.331 In particular, they assist in understanding how decision makers have approached the planning balance in circumstances where the Council has been unable to demonstrate a five-year supply of deliverable housing land and where the presumption in favour of sustainable development has been engaged.
- 5.332 They also provide a useful benchmark against which the Council's assessment of the Appeal Scheme can be evaluated.

The Shire Hill Hospital Appeal

- 5.333 The appeal decision relating to Shire Hill Hospital, Glossop, is of particular relevance because it concerned a residential development proposal within the Borough and was determined against the backdrop of a housing land supply deficiency. **[CD 7.4]**
- 5.334 In that decision, the Inspector accepted that High Peak Borough Council could not demonstrate a five-year supply of deliverable housing land and concluded that paragraph 11(d) of the Framework was engaged.
- 5.335 Importantly, the Inspector attached considerable weight to the delivery of 52 dwellings, recognising that even a relatively modest housing contribution would assist in addressing the Borough's identified housing shortfall.
- 5.336 The Inspector's reasoning reinforces an important principle. Where a Local Planning Authority cannot demonstrate a five-year housing land supply, the delivery of additional housing is not a neutral consideration. Rather, it represents a significant public benefit that attracts substantial weight within the planning balance.
- 5.337 In the present case, the appeal proposal would deliver up to 100 dwellings, almost double the number considered in the Shire Hill appeal. Furthermore, the Council's housing land supply position has deteriorated since that decision and the emerging Local Plan remains significantly delayed.

- 5.338 In my opinion, the reasoning adopted by the Inspector at Shire Hill strongly supports the conclusion that the housing benefits of the Appeal Scheme should attract very substantial weight.

Recent High Peak Decisions

- 5.339 I have already addressed the relevance of the Crossings Road, Chapel-en-le-Frith **[CD 7.15]** and Goyt Valley House **[CD 7.14]** decisions at paragraph at 5.302. Those examples demonstrate the Council's recent approach to the application of paragraph 11(d) of the Framework in circumstances where it cannot demonstrate a five-year housing land supply. In particular, they show that the Council has accepted that development plan conflict does not automatically justify refusal where the tilted balance is engaged and where housing delivery benefits attract substantial weight.
- 5.340 I do not therefore repeat the detail here. Rather, I rely on those examples as further support for my conclusion that the housing and affordable housing benefits of the appeal scheme should attract very substantial weight in the overall planning balance.

Consistency of Approach

- 5.341 I consider these decisions to be relevant not because they dictate the outcome of this appeal, but because they demonstrate a consistent professional approach to the application of paragraph 11(d) in circumstances where housing need is pressing and the Council is unable to demonstrate a five-year supply of deliverable housing land.
- 5.342 In both cases, the Council's officers recognised that conflict with development plan policies did not automatically outweigh the benefits of housing delivery. Rather, the relevant exercise was to determine whether the identified harms significantly and demonstrably outweighed those benefits when assessed against the Framework as a whole.
- 5.343 That approach is entirely consistent with national policy and, in my opinion, represents the correct application of paragraph 11(d).
- 5.344 By contrast, the assessment undertaken in respect of the Appeal Scheme appears to elevate the alleged conflict relating to playing field land to a determinative position in the planning balance without undertaking the same careful evaluation of whether that harm is sufficient to outweigh the substantial benefits arising from the proposal.
- 5.345 This is particularly notable given that the Appeal Site is agreed to be sustainably located within the Glossop settlement boundary and suitable in principle for residential development. In many respects, therefore, the policy context for the Appeal Scheme is more favourable than that applying to some of the proposals which the Council has supported elsewhere.

Weight to be Attached to These Decisions

- 5.346 I fully recognise that neither previous appeal decisions nor planning committee reports are binding upon the Inspector. Each case must be determined on its own particular facts and circumstances. However, I consider that they remain material considerations and provide useful insight into the operation of paragraph 11(d), the significance of the Council's housing land supply shortfall and the weight that decision-makers have attached to housing delivery in recent cases. Collectively, they reinforce three important conclusions:

- High Peak's housing land supply shortfall is a matter of considerable significance;

- The delivery of new housing attracts substantial weight in the planning balance; and
- Development plan conflict does not automatically displace the presumption in favour of sustainable development where paragraph 11(d) is engaged.

5.347 In my opinion, the same approach should be adopted in the determination of this appeal (although for the avoidance of doubt I consider that there is compliance with the development plan).

C8 - Deliverability and Housing Delivery

5.348 As set out in Mr Shepherd's evidence **[CD 11.3]**, Derbyshire County Council does not intend to dispose of the site in its current condition. Rather, the Council's strategy is to secure planning permission in order to realise the site's development potential and maximise the value of the asset before disposal through a competitive marketing process.

5.349 Before any disposal can proceed, officers must satisfy a number of statutory and governance requirements. These include demonstrating that the land is surplus to operational requirements, obtaining the necessary approvals, complying with statutory disposal obligations, evidencing that best consideration is being achieved and undertaking a transparent marketing and disposal process. Officers will retain responsibility for oversight, governance and approval throughout the disposal process.

5.350 Carter Jonas's role is to unlock the site's development value. Their development team will not simply dispose of the land immediately. They will first establish the optimum development scheme, secure planning permission, test the market and then run a competitive disposal process on behalf of Derbyshire County Council. The intention is to ensure that the Council achieves the highest reasonable value from the land and can demonstrate that the eventual sale represents best consideration. Officers would oversee the process and retain responsibility for governance and approval of the final disposal.

5.351 Following the grant of planning permission and subsequent disposal of the site, a developer would not be in a position to commence development immediately. In most circumstances, the purchaser would first need to secure approval of reserved matters, discharge pre-commencement planning conditions and complete various technical, legal and regulatory processes before development could begin. These commonly include highway agreements, detailed drainage approvals, utility arrangements and ecological requirements.

5.352 Nevertheless, based upon my experience of delivering comparable residential developments, these are routine stages in the development process and do not represent any fundamental barrier to delivery. The evidence before the Inquiry demonstrates that the appeal site is available, suitable and capable of being developed within a realistic timeframe.

5.353 Subject to the grant of planning permission, I would anticipate the site being marketed and disposed of in the short term, with development commencing following completion of the necessary post-permission and acquisition processes. There is already significant interest from a number of housebuilders and developers, providing confidence that the site would be acquired and delivered promptly following the grant of permission. Importantly, the proposed development would make a meaningful contribution towards housing delivery at a time when the Council is unable to demonstrate a five-year supply of deliverable housing land and housing needs remain acute.

5.354 The proposed development would deliver up to 100 dwellings, including 30 affordable homes, within a highly sustainable location inside the Glossop settlement boundary. Drawing upon the development appraisal evidence prepared by Carter Jonas (**Appendix 6**), a development of this scale would typically

be built out over approximately two to two-and-a-half years, providing a steady and reliable source of new housing completions during that period.

- 5.355 The comparative appraisal evidence further demonstrates that maximising the residential capacity of the site delivers the greatest public benefit. The 100-dwelling scheme would provide 34 additional homes and 10 additional affordable homes when compared with the playing field option, together with a materially greater level of planning contributions. The appraisal therefore identifies a clear relationship between reductions in residential development and reductions in housing delivery, affordable housing provision and wider community benefit.
- 5.356 This benefit is particularly important when viewed in the context of the Council's acknowledged housing land supply deficit, the continuing delay to the emerging Local Plan and the Government's objective of significantly boosting the supply of homes. In these circumstances, the delivery of up to 100 new homes, including 30 affordable dwellings, should be afforded very substantial weight in the overall planning balance

The Need for Housing

- 5.357 Whilst I acknowledge that the Council has conceded that they cannot demonstrate a five-year housing supply, the Council and appellant disagree as to the weight to be afforded to the proposed housing delivery as a planning benefit.
- 5.358 I believe it is important to contextualise the need for housing both in recognition of the evolved national policy position but also considering High Peak District's background to historic delivery and impetus to embrace delivery of large scale, sustainable developments such as the appeal proposals.
- 5.359 On 12th December 2024 the Minister of State for Housing, Matthew Pennycook MP, published a Written Ministerial Statement ('Building the homes we need') which recognised the implications of a revised Standard Method in addressing the 'acute and entrenched housing crisis' [paragraph 43 CD 5.19], adding that 'a mandatory method is insufficient if the method itself is not adequate to meet housing need'(paragraph 44 CD 5.19).
- 5.360 The Government's formal response to the consultation anticipates that new policy directed by NPPF 2024 will result in many housing sites coming forward across the country outside of the plan-led system:

'The plan-led approach is, and must remain, the cornerstone of the planning system. The imperative of rapidly driving up planning consents in the context of a system with inadequate local plan coverage will increase the number of permissions secured outside of plan allocations'

- 5.361 Housing policy within the NPPF maintains the Government's objective of significantly boosting the supply of homes (paragraph 46 of [CD 5.1]) by ensuring that sufficient choice and mix is made available to meet local identified housing needs
- 5.362 It follows that the NPPF imperative to boost significantly the need for housing remains as important as ever. The implications for High Peak District are considered in further detail below.
- defined built-up area where development is directed in accordance with the spatial strategy.
 - A Pragmatic and Positive Planning Decision
- 5.363 Before turning to the overall planning balance, it is important to step back and consider the broader context of this appeal and the role of the planning system in responding to real-world circumstances.

- 5.364 This appeal is not about the development of valued countryside, the loss of an active community facility, or the release of a site that performs an important ongoing public function. It concerns the future of a vacant, cleared, unattractive and long-redundant former school site that has remained unused since 2018 and which sits within the settlement boundary of one of the Borough's most sustainable locations. The educational use has permanently ceased, replacement educational and sporting facilities have been provided elsewhere, the former buildings and sports areas have been demolished with the Council's approval, and there is no realistic prospect of the site returning to its former use.
- 5.365 Against that background, the appeal proposals represent a logical, efficient and positive response to the site's circumstances. Rather than allowing a prominent brownfield site to remain vacant indefinitely, the scheme would secure its productive reuse and deliver a wide range of social, economic and environmental benefits. These include the provision of much-needed market and affordable housing, significant biodiversity enhancements, new areas of open space, public realm improvements and investment into local infrastructure.
- 5.366 Importantly, this is not a proposal that seeks to expand a settlement into the countryside or erode the Borough's valued landscapes. It proposes the redevelopment of a previously developed site located within the urban area of Glossop and surrounded on all sides by existing residential development. The site is sustainably located, benefits from good accessibility to services and facilities, and is precisely the type of land that national planning policy seeks to see brought forward for redevelopment.
- 5.367 The evidence before the Inquiry demonstrates that there is only one credible, viable and deliverable proposal. That proposal would transform a derelict and underutilised brownfield site into a high-quality residential neighbourhood, delivering much-needed market and affordable housing, substantial biodiversity gains, public open space, investment in local infrastructure, and the remediation of a visually unattractive site which currently contributes little to the community.
- 5.368 The Framework is clear that substantial weight should be given to the reuse of suitable brownfield land within settlements. Equally, decision-makers are directed to support sustainable development, make effective use of land and significantly boost the supply of housing. Those objectives are not abstract policy aspirations; they reflect a deliberate and continuing Government response to an acknowledged housing crisis and the need to make better use of previously developed land. In my opinion, this appeal site achieves all of those objectives.
- 5.369 The proposal also reflects a fundamentally important principle of good planning: land should be used purposefully and efficiently. There is little planning benefit in the continued sterilisation of a site which no longer performs its historic function and for which no realistic alternative use exists. By contrast, there is clear public benefit in bringing forward a deliverable scheme capable of making a meaningful contribution towards identified housing needs whilst simultaneously securing environmental enhancements and the remediation of a vacant and underutilised site
- 5.370 The planning system is intended to facilitate sustainable development, not simply preserve the status quo. In this case, the redevelopment of the site represents an opportunity to transform a long-standing brownfield liability into a positive asset for Glossop. It would make effective use of land, assist in addressing acute housing needs, deliver significant environmental gains and ensure that a redundant site is returned to a beneficial use.
- 5.371 In my opinion, those characteristics are the hallmarks of good planning. The appeal proposals are not merely an acceptable form of development; they represent a positive, sustainable and proactive

response to the planning challenges and opportunities presented by this site. In my opinion, this is precisely the type of development that national planning policy seeks to encourage.

C9 – Overall Planning Balance

Introduction

- 5.372 Having considered the Inspector's main issues, the relevant provisions of the development plan and the material considerations before the Inquiry, it is necessary to stand back and undertake the overall planning balance.
- 5.373 In doing so, it is important to recognise the particular circumstances of this appeal. This is not a proposal involving the release of Green Belt land, the loss of open countryside, or the redevelopment of an active community facility. Rather, it concerns the redevelopment of a vacant and previously developed former school site which has remained unused since 2018 following the relocation of educational and sporting facilities to the replacement Glossopdale School campus at Hadfield.
- 5.374 The Appeal Site lies within the built up area boundary of Glossop, one of the Borough's principal and most sustainable settlements. The parties agree that the site is sustainably located and suitable in principle for residential development. Furthermore, there is substantial common ground that there are no unresolved technical objections relating to matters such as highways, accessibility, drainage, flood risk, heritage, ecology, landscape impact or affordable housing provision.
- 5.375 The appeal therefore turns on a relatively narrow range of issues. Against that backdrop, it is necessary to assess whether the identified harms, either individually or collectively, are sufficient to outweigh the considerable benefits which the proposal would deliver.

Benefits of the Proposal

- 5.376 The proposed development would generate a wide range of significant planning benefits which attract substantial weight in favour of the grant of planning permission. The scheme would make an important contribution towards addressing identified housing needs within High Peak Borough, whilst simultaneously delivering economic, social and environmental benefits that align with both local and national planning objectives. In particular, the proposal would represent a sustainable form of development that supports the delivery of new homes within a highly accessible location, contributes towards economic growth and assists in maintaining the long-term vitality and resilience of Glossop as one of the Borough's principal settlements.

Housing Delivery

- 5.377 First and foremost, the proposal would deliver up to 100 dwellings within a sustainable location at a time when the Council accepts that it cannot demonstrate a five-year supply of deliverable housing land. The development would make a meaningful contribution towards increasing the Borough's housing supply, broadening housing choice and meeting the needs of existing and future residents. The scheme would also help attract and retain economically active households, support younger residents seeking to remain within the Borough and contribute towards the creation of balanced and sustainable communities. In the context of the Borough's significant housing land supply shortfall and the Government's objective of significantly boosting the supply of homes. I consider that this benefit attracts very substantial weight. This is particularly the case given the Borough's acknowledged housing land supply position of between 1.89 and 2.47 years, which demonstrates a severe and persistent failure to identify sufficient deliverable housing sites

Affordable Housing

- 5.378 Secondly, the proposal would deliver a significant affordable housing contribution. The provision of approximately 30 affordable homes would make a meaningful contribution towards addressing an identified and persistent affordable housing need within the Borough. The delivery of affordable housing is a priority identified within the Council's own housing strategy and evidence base, and the proposal would therefore generate significant social benefits for those households unable to access suitable accommodation through the open market. This benefit is particularly important when viewed against the Council's own evidence identifying an affordable housing requirement of between 228 and 270 dwellings per annum and recent delivery of only 211 affordable homes over the most recent three-year monitoring period
- 5.379 Given the scale of identified need and the limited prospects of addressing that need through existing housing supply, I attach very substantial weight to this benefit.

Brownfield Redevelopment

- 5.380 Thirdly, the proposal would secure the productive reuse of a vacant brownfield site within the urban area of Glossop. The Framework is clear that substantial weight should be given to the redevelopment of suitable previously developed land within settlements. The appeal proposal would transform a long-vacant and underutilised former school site into a high-quality residential development and thereby make effective use of land in accordance with national policy. I attach substantial weight to this benefit.

Sustainable Location

- 5.381 Fourthly, the proposal would deliver housing within the settlement boundary of Glossop, one of the Borough's principal and most sustainable settlements. The site benefits from good access to local services, facilities, employment opportunities and public transport and is agreed by the parties to be suitable in principle for residential development. Significantly, the Statement of Common Ground confirms that the sustainability of the location is no longer in dispute. This represents a substantial and agreed benefit of the scheme. The development would further support the long-term vitality and resilience of Glossop through increased resident expenditure and by helping to sustain local services and facilities. I attach substantial weight to this benefit.

Economic Benefits

- 5.382 Fifthly, substantial economic benefits would arise during both the construction and operational phases of development. Construction activity would create direct employment opportunities across a wide range of trades, professions and support services, whilst generating significant demand for local contractors, subcontractors, suppliers and service providers. The proposal would facilitate considerable private-sector investment within the Borough, supporting business activity and contributing to economic output both locally and across the wider region. I provide a statement prepared by Carter Jonas regarding the economic benefits that the appeal proposal could deliver in **Appendix 8**.
- 5.383 Upon occupation, future residents would contribute to the local economy through ongoing expenditure on retail, leisure, hospitality, healthcare, professional services and other day-to-day goods and services. This increased spending power would help sustain local businesses, support employment and strengthen economic activity within Glossop and the wider Borough. The proposal would therefore support the vitality and viability of Glossop town centre and reinforce its role as an important service and employment centre. The development would also generate additional Council Tax revenues and

planning obligations supporting local infrastructure and community facilities. Collectively, I attach moderate to significant positive weight to these economic benefits.

Environmental and Placemaking Benefits

- 5.384 Sixthly, the proposal would deliver a range of environmental and placemaking benefits. The development incorporates public open space, landscaping, green infrastructure and biodiversity enhancements which would contribute to environmental quality, ecological resilience and the overall attractiveness of the site. It would also secure the beneficial reuse of a vacant and previously developed site and deliver measurable biodiversity net gain.
- 5.385 The proposal would further provide modern sustainable drainage infrastructure, improved pedestrian connectivity and opportunities for sustainable travel. These measures would assist in managing surface water runoff, support climate resilience, encourage walking and reduce reliance on private car travel. Taken together, I attach moderate positive weight to these environmental and placemaking benefits.

Agreed Sustainability Benefits

- 5.386 It is also important to recognise that the sustainability credentials of the proposal are now largely a matter of agreement between the parties. Whilst the Council's committee report acknowledged the sustainability benefits of the site, the Statement of Common Ground goes further and formally confirms that the appeal site is sustainably located, lies within the settlement boundary and is suitable in principle for residential development. In my opinion, this agreed position materially strengthens the benefits side of the planning balance and significantly narrows the matters genuinely in dispute before the Inquiry.

Harm Arising from the Proposal

- 5.387 The principal area of dispute relates to the first reason for refusal concerning the alleged loss of playing field land.
- 5.388 However, for the reasons set out in my assessment of Main Issue A, I do not consider that the site constitutes an existing playing field or meaningful sporting resource for the purposes of paragraph 104 of the Framework. Even if it does, paragraph 104 is complied with by the proposed development. No harm results.
- 5.389 If, contrary to my position, the Inspector were to conclude that the proposal does not comply with paragraph 104 of the Framework, I consider that any resulting harm would be limited and should attract only very limited weight in the overall planning balance. As set out above, the site does not operate as a meaningful playing field or sporting resource and its development would not result in any material loss of playing field provision or opportunity.
- 5.390 In relation to the second reason for refusal, I have explained under Main Issue B why I do not consider there to be any meaningful harm arising from the proposed quantum of development. The evidence of Mr Crawford **[CD 11.4]** demonstrates that the site can comfortably accommodate approximately 100 dwellings through a landscape-led design approach whilst achieving a high standard of placemaking, safeguarding residential amenity and responding appropriately to site constraints. In my opinion, this should not be treated as the absence of harm; rather, it is a positive design and placemaking benefit which attracts significant positive weight in the planning balance and supports the conclusion that the Council's second reason for refusal is unfounded.
- 5.391 Consequently, I do not attribute any weight to the Council's second reason for refusal.

The Tilted Balance

- 5.392 As set out previously, it is common ground that the Council cannot demonstrate a five-year supply of deliverable housing land and that the most important policies for determining the appeal are out-of-date.
- 5.393 Paragraph 11(d) of the Framework is therefore engaged.
- 5.394 In those circumstances, planning permission should be granted unless the application of policies within the Framework that protect areas or assets of particular importance provide a strong reason for refusal, or unless the adverse impacts of the proposal would significantly and demonstrably outweigh its benefits when assessed against the Framework as a whole.
- 5.395 In my opinion, neither of those circumstances arises.

Conclusion on the Planning Balance

- 5.396 Drawing these matters together, I conclude that the proposal represents sustainable development for the purposes of the Framework.
- 5.397 The Appeal Site is a vacant and previously developed site in a highly sustainable location which is agreed to be suitable in principle for residential development. The proposal would deliver significant housing, affordable housing, economic, social and environmental benefits at a time when the Council faces an acute housing land supply deficit and significant delays to the preparation of a replacement Local Plan.
- 5.398 Any identified harms are limited in scope and weight and are substantially outweighed by the benefits of the proposal.
- 5.399 Accordingly, having regard to the development plan, the Framework and all other material considerations, I conclude that the planning balance weighs decisively in favour of the appeal and that planning permission should be granted.

Conclusion on Main Issue C

- 5.400 In summary, there is substantial common ground between the parties on the matters most relevant to Main Issue C. The Council accepts that it cannot demonstrate a five-year supply of deliverable housing land and that the adopted development plan is out-of-date for the purposes of decision-taking. The Statement of Common Ground [CD 12.1] further confirms that the appeal site lies within the settlement boundary of Glossop, occupies a sustainable location and is suitable in principle for residential development. These are significant matters which establish a clear policy context for the determination of this appeal.
- 5.401 The Appeal Site represents a highly sustainable brownfield development opportunity within one of the Borough's principal settlements. It is available, deliverable and capable of providing up to 100 dwellings, including a substantial affordable housing contribution, at a time when High Peak faces an acute housing land supply shortfall and continuing under-delivery against identified housing requirements. The position is further compounded by the continuing delay to the emerging Local Plan and the increased housing requirements arising from the revised Standard Method. In these circumstances, the housing and affordable housing benefits of the proposal attract very substantial weight in the planning balance.

- 5.402 The significance of those benefits is reinforced by both national policy and recent decision-making within the Borough. Recent committee reports demonstrate that the Council has accepted the grant of planning permission for proposals involving materially greater policy conflict where the tilted balance under paragraph 11(d) of the Framework has been engaged. In my opinion, there is no justification for affording lesser weight to the benefits of the current proposal, particularly given that the Appeal Site is agreed to be sustainably located within the settlement boundary and suitable for residential development in principle.
- 5.403 The approach taken by the Inspector in the Shire Hill Hospital appeal is also instructive. **[CD 7.4]** There, despite identified heritage harm, considerable weight was attached to the delivery of 52 dwellings in the context of a housing land supply shortfall. The present appeal would deliver almost double that number of homes on a vacant brownfield site in an agreed sustainable location. In my opinion, the housing benefits of the Appeal Scheme attract at least equivalent, and in reality greater, weight than those identified by the Inspector in Shire Hill.
- 5.404 Mr Holliday's evidence **[CD 11.2]** demonstrates both a severe housing land supply shortfall and a significant under-delivery of affordable housing across the Borough. High Peak cannot demonstrate even half of the housing land supply required by national policy and affordable housing delivery remains substantially below identified need. These factors materially increase the weight that should be attributed to the housing and affordable housing benefits of the appeal proposal.
- 5.405 Drawing all of these matters together, I conclude that the proposal would make a substantial and meaningful contribution towards addressing market and affordable housing needs within High Peak. The development would deliver much-needed homes in a sustainable location, make effective use of previously developed land, support the vitality of Glossop and contribute towards the objectives of the Framework to significantly boost the supply of housing. When assessed through the proper application of paragraph 11(d), I consider that these benefits weigh heavily in favour of the proposal and comfortably outweigh the limited harms identified by the Council. Accordingly, Main Issue C strongly supports the grant of planning permission.

6. SUMMARY OF BENEFITS AND HARM

Approach to Weighting

- 6.1 Before considering the individual planning considerations, it is important to recognise the extent of the common ground that now exists between the parties. The Statement of Common Ground [CD 12.1] confirms agreement that the Appeal Site lies within the settlement boundary of Glossop, occupies a sustainable location and is suitable in principle for residential development. There are no substantive objections in relation to highways, drainage, flood risk, ecology, heritage, landscape or affordable housing provision. As a consequence, the matters remaining in dispute are relatively narrow and principally concern the alleged loss of playing field land and the Council's concerns regarding design quality and development quantum.
- 6.2 In assessing the planning balance, I have had regard to the scale and importance of each planning consideration in the context of this appeal, the relevant provisions of the Development Plan, the Framework and other material considerations. The weight afforded is ultimately a matter of planning judgement. However, in my opinion, substantial positive weight should be attached to those benefits which directly address the Borough's acknowledged housing land supply shortfall and affordable housing needs, together with the redevelopment of a sustainable brownfield site. Lesser but still important weight is attributed to the additional economic, environmental and social benefits arising from the development.
- 6.3 The scale descriptors used within the planning balance are not those devised by the Appellant. Rather, they reflect the agreed hierarchy set out within the Statement of Common Ground on Planning Balance Matters between the Appellant and the Council. The scale was initially proposed by the Council and subsequently agreed by both parties as a common framework through which the relative importance of planning benefits and harms can be assessed consistently.

The agreed scale comprises:

- Substantial positive weight
 - Significant positive weight
 - Moderate positive weight
 - Limited positive weight
 - Neutral weight
 - Limited negative weight
 - Moderate negative weight
 - Significant negative weight
 - Substantial negative weight
- 6.4 The purpose of adopting this agreed scale is not to remove the exercise of planning judgement, but to provide a transparent and consistent framework for comparing the relative significance of the various material considerations arising from the appeal proposal. The weight ultimately attributed to each matter remains a matter of planning judgement informed by the evidence before the Inquiry, the Development Plan, the National Planning Policy Framework and other material considerations.

- 6.5 In applying this agreed framework, I have had particular regard to the extent of common ground between the parties, the Council's accepted housing land supply shortfall, the sustainable and previously developed nature of the Appeal Site, and the degree to which individual benefits and harms contribute to, or conflict with, the objectives of national and local planning policy.
- 6.6 The table below therefore sets out my assessment of the weight that should properly be afforded to each principal planning consideration using the agreed scale contained within the Statement of Common Ground on Planning Balance matters. **[CD 12.8]**

Table 1: Statement of Common Ground on Planning Balance Matters

Planning matter	Weight afforded by the Council	Weight afforded by the Appellant
Re-use of previously developed land within a settlement boundary	Moderate positive weight	Substantial Positive Weight
The sustainable location of the site	Moderate positive weight	Substantial Positive Weight
Safe and appropriate vehicle access to the site	Neutral weight	Neutral Weight
Meeting identified need for housing	Substantial positive weight	Substantial Positive Weight
Delivering a mix of housing	Limited positive weight	Moderate Positive Weight
Delivering additional affordable housing	Substantial positive weight	Substantial Positive Weight
Economic and social benefits from the development	Moderate positive weight	Substantial Positive Weight
Loss of identified playing fields	Significant negative weight	Not a material consideration in primary case. Alternatively, limited negative weight if conflict with paragraph 104 of the NPPF.
Impacts on existing vegetation on the site	Neutral weight	Neutral Weight
Increase in BNG over the 10% requirement	Limited positive weight	Substantial Positive Weight
Impact on conservation areas and other heritage assets	Neutral weight	Neutral Weight
Impact on the wider landscape and townscape character	Neutral weight	Neutral Weight
Concerns about overall design quality	Significant negative weight	Substantial Positive Weight
Impact on neighbour amenity	Significant negative weight	Neutral Weight
Appropriate drainage strategy	Neutral weight	Moderate Positive Weight

Planning matter	Weight afforded by the Council	Weight afforded by the Appellant
Provision of commuted sum provisions for infrastructure	Neutral weight	Limited Positive

Additional Planning Benefits

6.7 In addition to the benefits already identified in the Statement of Common Ground, there are three further material considerations which attract positive weight:

- The proposed sports mitigation and enhancement package
- The delivery of planning obligations and infrastructure contributions through the Section 106 Agreement
- The delivery of housing now, during a period when the Council has failed to maintain an adequate housing land supply and remains substantially delayed in progressing a replacement Local Plan.

Table 2: Additional Planning Benefits

Additional Matter	Weight
Sports mitigation and enhancement package	Significant Positive Weight
Section 106 contributions and infrastructure funding	Limited to Moderate Positive Weight
Delivery of housing during continued plan-making and housing land supply failure	Moderate Positive Weight

Appellant's Overall Planning Balance Assessment

- 6.8 The table below draws together the principal planning considerations arising from the appeal and identifies the weight that, in my professional opinion, should properly be attached to each matter.
- 6.9 In undertaking this exercise, I have had regard to the agreed weighting framework contained within the Statement of Common Ground, the evidence before the Inquiry and the relevant provisions of the Development Plan and the Framework. Whilst the parties broadly agree on the planning matters which require consideration, there remains a significant difference of opinion regarding the weight that should be attributed to a number of those considerations.
- 6.10 In my opinion it is important that the planning balance is considered in its proper context. This is not a case where the Council can demonstrate a five-year supply of deliverable housing land, nor is it a case where an up-to-date Local Plan is in place to meet identified housing needs. The Council accepts that it cannot demonstrate a five-year housing land supply and that the most important policies for determining the appeal are out-of-date. Furthermore, the appeal site is agreed to be located within the Glossop settlement boundary, to occupy a sustainable location and to be suitable in principle for residential development. These matters materially influence the weight that should be attached to the proposal's benefits.
- 6.11 The most significant benefits arising from the proposal are those which directly address the Borough's acknowledged housing delivery deficiencies. In particular, the proposal would deliver up to 100 dwellings, including approximately 30 affordable dwellings, on a vacant and previously developed site within one of the Borough's most sustainable settlements. These benefits align directly with the

Framework's objective of significantly boosting the supply of homes and carry substantial positive weight both individually and collectively.

- 6.12 I also attach substantial positive weight to the redevelopment of this brownfield site. The Framework requires substantial weight to be given to the value of using suitable previously developed land within settlements for homes and other identified needs. The site is wholly contained within the settlement boundary, is surrounded by existing development and represents a sustainable opportunity to deliver new homes without the release of countryside, Green Belt or other sensitive land. In my opinion, this materially distinguishes the appeal proposal from many other housing schemes and strengthens the benefits side of the planning balance.
- 6.13 The sustainability credentials of the site attract substantial positive weight in their own right. Importantly, this is not merely the Appellant's opinion but a matter formally agreed between the parties through the Statement of Common Ground. The proposal would direct growth to a location with established access to services, facilities, public transport and employment opportunities, consistent with both local and national planning policy objectives.
- 6.14 The proposal also generates a range of additional benefits which reinforce its sustainability credentials and attract significant or moderate positive weight. These include the provision of housing choice and housing mix, economic investment during construction and occupation, biodiversity net gain, public open space, green infrastructure enhancements, improvements to local sporting provision and investment through planning obligations. Whilst individually of lesser significance than the housing and affordable housing benefits, collectively they represent a substantial package of social, economic and environmental benefits.
- 6.15 By contrast, the areas of harm identified by the Council are comparatively limited. There are no outstanding technical objections in relation to highways, accessibility, flood risk, drainage, ecology or heritage. There is also substantial common ground that the site is suitable in principle for residential development. Consequently, many of the matters commonly relied upon to justify the refusal of major residential schemes do not arise in this case.
- 6.16 The principal remaining area of dispute concerns the alleged loss of playing field land. However, for the reasons set out in Section 5 of this Proof, I do not consider that the site constitutes an existing playing field for the purposes of paragraph 104 of the Framework. Even if the Inspector reaches a different conclusion, the practical consequences of any policy conflict are extremely limited. The site contains no formal playing pitches, has not operated as an active sporting resource for many years, provides no community sporting function and has already had its former educational and sporting role replaced through enhanced facilities elsewhere. Accordingly, even if conflict with paragraph 104 is identified, I consider the resulting harm attracts only limited negative weight.
- 6.17 The principal differences between the Council and the Appellant therefore relate less to the planning considerations that are relevant to the decision and more to the weight that should properly be attached to them. Whilst the parties broadly agree on the benefits associated with housing delivery, affordable housing, brownfield redevelopment and sustainability, they differ significantly in their assessment of the relative importance of those benefits and the weight that should be attributed to the alleged loss of playing field land.
- 6.18 When viewed as a whole, the planning balance is not a finely balanced exercise. The proposal delivers multiple benefits attracting substantial positive weight, including housing delivery, affordable housing delivery, redevelopment of a sustainable brownfield site and the contribution the scheme would make

towards addressing the Council's severe housing land supply shortfall. These benefits are further reinforced by a range of additional economic, environmental and community benefits.

- 6.19 Against these benefits, the harms identified by the Council are either absent, neutral in effect or attract only limited weight. In my professional opinion, the evidence does not demonstrate any adverse impact which comes close to outweighing the substantial benefits arising from the proposal.
- 6.20 Consequently, when assessed against the Development Plan as a whole and through the proper application of paragraph 11(d) of the Framework, I conclude that the benefits of the proposal clearly, and decisively, outweigh the limited harms identified. The proposal represents sustainable development, and planning permission should therefore be granted.

Table 3: Summary of Weight Category

Weight Category	Matters
Substantial Positive	Brownfield redevelopment, sustainable location, housing delivery, affordable housing, addressing housing shortfall, Economic/social benefits, design quality, BNG
Significant Positive	Sports mitigation and enhancement package
Moderate Positive	Housing mix, drainage improvements
Limited Positive	Section 106 contributions
Neutral	Highways, heritage, vegetation, landscape/townscape, neighbour amenity
Limited Negative	Alleged loss of playing field land (if any conflict is found to arise)

Additional benefits to the Appellant

Educational Infrastructure and Associated Financial Benefits

- 6.21 A further material consideration arises from the relationship between the appeal proposals and the delivery of the replacement Glossopdale School and associated sporting infrastructure. As Mr Shepherd explains, the disposal of the appeal site formed an integral component of the wider school reorganisation strategy and funding mechanism approved by Derbyshire County Council and endorsed through the Secretary of State's consent under Section 77. The educational, sporting and financial elements of that strategy were intrinsically linked from the outset, with the capital receipt from the disposal of the appeal site forming part of the funding assumptions underpinning the delivery of the replacement school and associated facilities.
- 6.22 This is significant in policy terms. Paragraph 100 of the Framework states that planning decisions should give significant weight to the importance of facilitating new, expanded or upgraded public service infrastructure. The replacement Glossopdale School, together with the enhanced sporting facilities delivered as part of the wider consolidation programme, plainly constitutes upgraded public service infrastructure of the type envisaged by national policy. The appeal site has played, and continues to play, an important role in facilitating that infrastructure through the approved estate rationalisation and funding strategy.

- 6.23 In my opinion, the significance of this matter extends beyond the generation of a capital receipt in isolation. The redevelopment of the appeal site would represent the final stage in the implementation of a long-established and Secretary of State-approved strategy that has already delivered substantial educational and sporting benefits for the community. It would enable the financial assumptions underpinning that programme to be realised in full and contribute towards reducing borrowing and liabilities associated with the delivery of the replacement school and related investment.
- 6.24 Having regard to the support afforded by paragraph 100 of the Framework and the evidence of Mr Shepherd, I attach significant positive weight to this benefit. The educational, sporting and financial outcomes are not separate considerations but interrelated elements of the same public investment programme. The proposal would therefore assist in securing the full benefits of that programme and this weighs significantly in favour of the appeal.

The statutory test in section 38(6) PCPA 2004

- 6.25 Finally, applying the statutory test in section 38(6) PCPA 2004 I conclude:
- The proposed development complies with the development plan, read as a whole.
 - The other material considerations in this case support the grant of planning permission in accordance with the development plan.
 - In the alternative, even if there is conflict with the development plan, it is limited in extent and nature, such that it is outweighed by the other material considerations in this case which support the grant of planning permission.
 - Accordingly, on either basis, planning permission should be granted.

7. CONCLUSIONS

- 7.1 This appeal concerns the redevelopment of a vacant and previously developed former school site which has remained unused since the relocation of Glossopdale Community College in 2018. The site lies within the settlement boundary of Glossop, one of the Borough's principal settlements, and it is agreed between the parties that it occupies a sustainable location and is suitable in principle for residential development.
- 7.2 The evidence presented to the Inquiry confirms that High Peak Borough Council is unable to demonstrate a five-year supply of deliverable housing land and that the adopted development plan is out-of-date for the purposes of decision-taking. In these circumstances, paragraph 11(d) of the National Planning Policy Framework is engaged and the appeal falls to be determined through the presumption in favour of sustainable development.
- 7.3 The proposal would deliver up to 100 dwellings, including approximately 30 affordable homes, on a sustainable brownfield site. In my opinion, these benefits attract very substantial weight in circumstances where the Council faces both a significant housing land supply shortfall and a persistent unmet need for affordable housing. The proposal would also secure the productive reuse of a long-term vacant site and generate a range of associated economic, social and environmental benefits.
- 7.4 In relation to the first reason for refusal, I have explained why I do not consider that the appeal proposal would result in the loss of an existing playing field or meaningful sporting resource for the purposes of paragraph 104 of the Framework. The site has not performed a sporting function for a considerable period, contains no dedicated playing pitches, and the educational and sporting functions formerly associated with the site have already been replaced elsewhere through the Glossopdale School consolidation programme. Furthermore, the appeal is accompanied by a package of sports improvements and enhancements which would provide additional investment in local sporting facilities.
- 7.5 Even if the Inspector were to conclude that paragraph 104 is engaged, any resulting harm must be assessed in the context of the site's current condition, its limited sporting function, and the replacement and enhanced provision already available within Glossop. In my opinion, these are important considerations when determining the weight to be attributed to any conflict with national policy.
- 7.6 In relation to the second reason for refusal, the evidence of Mr Crawford demonstrates that the site is capable of accommodating a high-quality residential development of the scale proposed. The parameter plans, illustrative material and supporting technical evidence provide a robust framework through which detailed matters can be secured through the reserved matters process, consistent with the nature of an outline planning application.
- 7.7 Importantly, there is substantial common ground between the parties. The site is agreed to be sustainably located and suitable for residential development in principle. There are no substantive objections in relation to highways, accessibility, drainage, flood risk, ecology, heritage, landscape or affordable housing provision. Consequently, the matters remaining before the Inquiry are relatively narrow in scope.
- 7.8 Having considered the development plan, the Framework and all other material considerations, I conclude that the proposal represents a sustainable form of development. It would deliver significant housing and affordable housing benefits, secure the redevelopment of a sustainable brownfield site, and contribute positively to the economic, social and environmental objectives of the planning system.

- 7.9 Drawing all matters together, I conclude that the benefits of the proposal clearly outweigh the adverse impacts identified. I do not consider that there are any policies within the Framework which provide a strong reason for refusing the development, nor do I consider that any identified harms significantly and demonstrably outweigh the proposal's benefits when assessed against the Framework as a whole.
- 7.10 For these reasons, it is my professional opinion that the appeal should be allowed and planning permission granted.

APPENDICES

1. Sarah Cox CV



Sarah Cox MRTPI

Partner

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Sarah is a skilled and experienced chartered town planner with over 24 years' experience. She has experience in managing the planning process on residential, mixed-use, commercial and leisure developments in a variety of locations on behalf of a diverse client base including developers, investment funds, social housing providers, landowners and public companies.

Primary Skills

Sarah has significant experience within the public and private sector, allowing her to pro-actively manage planning projects, policy formation, planning strategy and deliver positive outcomes whilst balancing client aspirations, time and budget constraints. Sarah is skilled in policy formation and planning strategy, developing policies and strategies that guide sustainable development and land use. She excels in managing planning projects from inception to completion, ensuring they meet regulatory requirements and client goals.

Sarah also advises clients on other elements of the planning process including site appraisals, preparing feasibility appraisals, preparation and presentation of representations to Local Plan Examinations, expert planning witness at a Public Inquiry and preparation of planning statements and liaison with clients, local authorities and Counsel.

Examples of Experience

AP Wireless II (UK) Ltd

In August 2025, I provided expert witness evidence at the case of On Tower UK Limited v AP Wireless II UK Ltd & Icon Tower Infrastructure Ltd ('Queens Oak Farm'), acting on behalf of the respondent.

In July 2024, I provided expert witness evidence at the Cellnex Land Tribunal Hearing in the case of On Tower UK Limited v AP Wireless & Others [2024] ('Ewefields Farm'), acting on behalf of the respondent

Northern Gateway, Bury and Rochdale

Working closely with the Joint Venture Vehicle representing the landowners and prepared representations to the recent Places for Everyone (PfE) public consultation process to promote the largest broad allocation for mixed use development within the Plan. Sarah led the planning strategy advice, taking a pivotal role in presenting a unified case to secure both officer and political support for the proposed allocation.

The Northern Gateway is an extensive area located around Junction 18 of the M60 motorway extending east to Junction 19 of the M62 and north to Junction 3 of the M66. Development of the area will deliver a large, nationally significant employment led opportunity to attract high quality business and investment which is supported by new housing.

National Highways (NH)

Work with the Infrastructure team to assist with the delivery of the National Property Management, Enquiries and Sales and Estates contract for National Highways. Involves providing planning lead on any strategy for long term disposal, redevelopment or acquisition proposals, offering a 'shoulder to shoulder' role to the NH delivery team and overseeing planning applications submitted by the national P&D team on behalf of NH.

Leeds Teaching Hospitals NHS Trust (LTHT)

Advising LTHT on capital developments within their estate, including obtaining planning permission for upgrades to their existing portfolio of buildings as part of wider rationalisation programme of their five campuses providing both strategic and detailed planning advice through the planning and construction process.

Derbyshire County Council & Cumbria County Council

Work as part of a wider team with both Councils as part of a rationalisation and disposal programme, providing strategic advice where necessary together with managing planning projects from inception to completion before disposal.

Houghton Regus North, Central Bedfordshire

On behalf of Lands Improvement Sarah assisted with the preparation of an outline planning application for circa 5000 residential units and 2000,000sqm of commercial, retail and community facilities on unallocated land in the Green Belt. Public Engagement with the local community, parish and town councils as well as other stakeholders was a key element in delivering a robust flexible planning application.

Land North of Luton and Sundon (east of M1 J11a)*

Working on behalf of AXA Investors, Sarah prepared a Planning Performance Agreement (PPA) with Central Bedfordshire Council for an outline planning application over a parcel of land identified for a new development. Included preparing a Framework Plan to promote the allocation of the land within Proposed North of Luton and Sundon Rail Freight Interchange (RFI) Strategic Allocations supported and later adopted by the LPA.

Student Residential Development, Whitelock Street, Leeds*

Secured resolution to grant planning permission for Alumno for the redevelopment of the site in Mabgate to provide a mixed-use six and seven storey building comprising 105 units that will house 411 students. Facilities will include a range of communal areas, including a central hub, gym, cinema, laundry room, roof terrace with a garden and extensive secure bicycle storage along with artist studios on the ground floor to be managed by East Street Arts.

The Crown, Tetley, Leeds*

Secured full planning permission for Vastint for the refurbishment of a locally listed derelict pub and hotel (dated from 1860s) and a new four-storey extension creating a pub and restaurant space, together with new 20,000 sq. ft adjoining commercial workspace. The proposed development, to be known as 'The Crown', forms part of the wider redevelopment of the former Tetley brewery which incorporates a large urban park at the heart of the scheme.

Sustainable Aviation Fuel Centre, AMRC, University of Sheffield*

Secured planning permission for a new facility on behalf of the University of Sheffield at the University's Advanced Manufacturing Campus. The building will provide increased facilities and capacity alongside the recently completed Translational Research Centre to increase research of sustainable aviation fuel sources.

The Royal Automobile Club (RAC), Woodcote Park*

Woodcote Park has been the Country Club of the Royal Automobile Club since 1913. Worked closely with the club over a number of years to implement a long-term masterplan consent, leading and coordinating planning application submission and provided strategic advice where necessary.

Friar Street, Reading*

Secured full planning permission for Aviva Investors in early 2018 for a major mixed-use residential, commercial and leisure scheme in a town centre location. Led the consultant team, advised on S106 issues and negotiated the application through to final decision and planning permission.

Swanley Town Centre*

Project planner for the development proposals for the redevelopment of a 1970s purpose built shopping centre. Promoting the site for redevelopment through the Development Plan system and negotiating with the LPA on behalf of Development Securities. .

Qualifications

Masters (Hons) Town and Country Planning (MTCP) (2:1) – University of Manchester (2000)

Member of the Royal Town Planning Institute (June 2002)

Career

2019 – 2021: Associate Director, Turley

2008 – 2019: Associate Planner, Barton Willmore

2005 - 2008: Senior Planner, Barton Willmore

2004 - 2005: Planning Coordinator, Vodafone

2003 - 2004: Senior Planning Officer, Royal Borough of Windsor and Maidenhead

2001 - 2003: Planning Officer, South Buckinghamshire District Council

2000 - 2001: Planning Officer, Reading Borough Council

*Project experience prior to Carter Jonas

2. Heritage Technical Note

Former Glossopdale Community College

Talbot Road, Glossop, Derbys.

Heritage Supporting Statement PINS Ref: 6006040

1. Introduction

- 1.1. An outline planning application (HPK/2024/0481) was submitted by Carter Jonas on behalf of Derbyshire County Council for the construction of up to 110 dwellings, with all matters reserved (except principal points of access) including all associated ancillary works and engineering operations. A heritage assessment was prepared by Prospect Archaeology in 2024 in support of this application (Field 2024). This application was refused in September 2025 on grounds unrelated to specific heritage concerns, but it was stated that

insufficient information has been provided with the application to demonstrate how it can achieve both high quality design and acceptable amenity standards at the detailed reserved matters stage with regard to the quantum of development seeking up to 110 dwellings. Accordingly, the proposal would not constitute a sustainable form of development contrary to policies S1, S5, H1, H2 and EQ6 of the Adopted Local Plan, the High Peak Design Guidance 2018 and Residential Guidance 2005 Supplementary Planning Documents (SPDs) as well as the National Planning Policy Framework (NPPF).

2. Revision of Proposals

- 2.1. The appellant subsequently lodged an appeal on March 6th 2026. A revised parameters plan was produced which includes a reduction in the number of proposed houses from 110 to 100 and improved buffering of the development from the surrounding houses (drwg no. 10592-LDA-XX-XX-DG-UD-3001-P01 dated March 4th 2026). These alterations do not affect the conclusions reached in the heritage assessment prepared in November 2024 (Field 2024).

3. Statement of Common Ground

- 3.1. The Statement of Common Ground between the Appellant and the Council confirms both parties agree that there will be no harm to heritage assets including conservation areas and listed buildings (para 6.32).

4. Heritage Objections

- 4.1. Objections from residents have been lodged concerning the proposals which include some that

lie within the scope of heritage concerns. They are all interconnected and comprise

a) Height of buildings

IP27 “Should the Inspector be minded to allow the appeal we respectfully request that dwelling Heights are limited to two stories by condition this would ensure that development accords with local plan policy EQ6.”

b) Restricted views of the Bell Tower

IP11 “With the demolition of the college this has inadvertently better revealed some wider views of the bell tower of the library grade 2 to the South with a pleasing backdrop of the Peak District. It would be suggested that consideration is given to creating a view of this looking S when designing the proposed layout as this will better reveal and enhance the designed prominence of this listed building (para. 210 of NPPF)”

c) Impact on the setting of the adjacent Conservation Areas

IP23 “the development is sited between two conservation areas and the proposed housing would not be in keeping with those areas”.

d) Buffering of the site development to protect views from and into adjacent housing and adjacent conservation areas

IP11 “Megan Atkinson in her HPBC Conservation comments also noted in her assessment and impact statement of 4 June 2025 important points that should be considered around soft landscaping along the northern edge of the development to maintain the verdant character and appearance of Howard Park which abuts this part of the development.”

4.2. In response to these objections

a) The proposed height of buildings will be limited to two storeys.

b) While the Bell Tower is a listed building, development would not harm the building’s heritage significance. In any event, careful design of the layout will ensure that views of the Bell Tower can be obtained.

c) Similarly, careful selection of building materials and sympathetic layout design will address concerns regarding the impact on adjacent Conservation Area settings.

d) Most of the views into the site are from Talbot Rd to the north whose houses are on higher ground. In the revised layout the main northern line of houses is positioned slightly farther south than previously proposed, although a short row of houses has been added that are closer to the northern site boundary, there would be no harm to the Howard Park Conservation Area. The additional proposed planting along the northern boundary adds extra screening. The lower density of housing in the northeast corner will avoid any impact on views from

Talbot Road into the site.

5. Conclusions

- 5.1. The proposed scheme is consistent with the residential character of the area and will cause no harm to the settings of the listed buildings or Conservation Areas in the vicinity.
- 5.2. The Appellant and Council are in agreement that there would be no harm to heritage assets from this development. A design code for the development would serve to address all the specific heritage concerns raised.

6. Reference

Field, Naomi, February 2024 (revised November 2024) *Former Glossopdale Community College, Talbot Road, Glossop, Derbys. Heritage Assessment*. Report by Prospect Archaeology Ltd LPA254- CAJ09

3. Transport Technical Note and Plan

rappor



Talbot Road, Glossop

Derbyshire County Council

**Transport Technical Note: Response to
Transport Comments from Interested Parties**

July 2026





Document Control

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Project Name	Talbot Road, Glossop
Document Title	Transport Technical Note: Response to Transport Comments
Status	03
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1 Introduction

- 1.1 This Transport Technical Note has been prepared by Rappor Consultants Ltd on behalf of Derbyshire County Council (The Appellant). It is submitted in support of an appeal against the refusal of outline planning application HPK/2024/0481 by High Peak Borough Council (HPBC) at Talbot Road, Glossop, which proposed the following:

“Outline planning permission for the construction of 110 dwellings, with all matters reserved (except the principal points of access) including all associated ancillary works and engineering operations.”

- 1.2 The planning application was refused by HPBC on 12 September 2025, with the Decision Notice identifying two reasons for refusal. Neither reason for refusal was related to transport or highway matters.
- 1.3 As part of the appeal process, the Appellant is seeking permission for up to 100 residential dwellings in place of the 110 dwellings assessed within the planning application. The reduction in dwelling numbers serves to reduce the potential transport impact of the proposed development.
- 1.4 This Transport Technical Note will focus on, and respond to, transport issues raised by Interested Parties.



2 Author Details and Instructions

- 2.1 My name is Matt (Matthew) Rudman and I am a Director at Rappor Consultants Ltd, a specialist transport planning and highway engineering consultancy.
- 2.2 I am a Chartered Engineer and a Fellow of the Chartered Institution of Highways and Transportation and have over 28 years' experience in transport planning. During this time, I have advised on a wide range of development proposals across the United Kingdom and have prepared Transport Assessments, Transport Statements, Travel Plans and other supporting technical evidence for planning applications and appeals.
- 2.3 I have been instructed by Derbyshire County Council, as Appellant, to prepare this Transport Technical Note in relation to the appeal concerning land at Talbot Road, Glossop.
- 2.4 My instructions are to review and respond to transport and highway matters raised by Interested Parties and to provide my professional assessment of the likely transport impacts associated with the proposed development, having regard to the evidence submitted in support of the planning application and relevant national and local planning policy.
- 2.5 The opinions expressed within this Technical Note are my own and are based upon my professional experience and review of the available evidence.



3 Planning and Transport Matters

Planning Application

- 3.1 Derbyshire County Council, in its role as Local Highway Authority and statutory consultee, undertook a detailed assessment of the application proposals HPK/2024/0481 and raised no objection to the development. The Highway Authority concluded that the proposals would not result in an unacceptable impact on highway safety and would not give rise to a severe impact on congestion or the operation of the highway network. Furthermore, the Highway Authority concluded that there were no justifiable grounds upon which an objection could be maintained.
- 3.2 Following submission of additional details relating to the proposed pedestrian and cycle access arrangements, the Highway Authority confirmed that the proposed access details were suitable and recommended amended planning conditions to secure their delivery and the implementation of the Residential Travel Plan.

Statement of Common Ground - Transport

- 3.3 Since the determination of the application, the Appellant and High Peak Borough Council have entered into a Statement of Common Ground. In relation to transport matters, it is agreed that a Transport Assessment was undertaken and submitted in support of the application and that the assessment concluded that the site could accommodate the traffic generated by a residential development of up to 110 dwellings without any material reduction in highway safety or severe impact on congestion.
- 3.4 The Statement of Common Ground further confirms that the site is accessible by a range of sustainable, non-car modes of transport and that Derbyshire County Council, as Highway Authority, confirmed it was satisfied with the application subject to the imposition of planning conditions. The Statement of Common Ground concludes that there are no highways or transportation issues in dispute between the parties.

Appeal Submission – Transport Matters

- 3.5 The Transport Assessment assessed a development comprising up to 110 dwellings. The appeal proposal now seeks permission for up to 100 dwellings. As the appeal scheme comprises fewer dwellings than previously assessed, the transport impacts identified within the Transport Assessment represent a robust and conservative assessment of the development currently before the Inspector.
- 3.6 For the sake of clarity, the following Principal Points of access are sought as part of the appeal:
- a) Talbot Road main access for all vehicle types and road users – as shown in SLR drawing 415.065105-D100.
 - b) North Road access for pedestrian and cyclists with emergency vehicle access only also provided for – as shown in SLR drawing 415.065105-D101.
 - c) Talbot Road (East) access for pedestrian and cyclists only – as shown in Rappor drawing 2607063-RAP-XX-XX-DR-TP-3201.



- 3.7 The pedestrian and cycle access shown on Rappor drawing 2607063-RAP-XX-XX-DR-TP-3201 reflects the revised location on Talbot Road identified on the updated Parameters Plan submitted as part of the appeal. Whilst the position of the access has been amended to align with the revised development parameters, the access arrangement itself is substantively unchanged from that previously assessed by Derbyshire County Council as Local Highway Authority under SLR drawing 415.065105-D102. The proposed access continues to provide the same function, design intent and user provision for cyclists and pedestrians, and in my professional opinion the revised arrangement does not give rise to any materially different or additional transport impacts when compared with those previously assessed.
- 3.8 In addition to the conclusions reached by Derbyshire County Council as Local Highway Authority, I have independently reviewed the proposed access arrangements associated with the appeal scheme, including the revised pedestrian and cycle access shown on Rappor drawing 2607063-RAP-XX-XX-DR-TP-3201. Having considered the submitted drawings and supporting transport evidence, I am satisfied that each of the proposed principal access points has been designed to fulfil its intended function, namely the provision of a vehicular access from Talbot Road, a pedestrian, cycle and emergency vehicle access from North Road, and a pedestrian and cycle access from Talbot Road (East). In my professional opinion, the proposed access strategy provides an appropriate, safe and functional means of access for all intended user groups and is consistent with the movement requirements of the proposed development.



4 Transport Matters Raised by Interested Parties

- 4.1 A review has been undertaken of the representations submitted by Interested Parties during the planning appeal process.
- 4.2 The transport and highway matters raised by Interested Parties are generally consistent and can be grouped into the following principal themes:
- a) The volume of traffic that would be generated by the proposed development;
 - b) The impact of development traffic on the operation of the local highway network, including Talbot Road, North Road, Fauvel Road, Woodhead Road and surrounding routes;
 - c) Existing traffic congestion within Glossop and the potential for additional delay arising from the development;
 - d) The cumulative effect of the development when considered alongside committed and recently completed developments within Glossop and the surrounding area;
 - e) The impact of development traffic on the operation of local highway junctions, including the Talbot Road/Fauvel Road/Woodhead Road junction and Talbot Road/North Road junction;
 - f) The potential highway safety implications associated with additional traffic movements;
 - g) The adequacy of parking provision and the potential for overspill parking on surrounding roads; and
 - h) The extent to which future residents would be reliant upon the private car for day-to-day journeys.
- 4.3 The following sections consider each of these matters in turn with reference to the transport evidence submitted as part of the planning application and the proposed reduction in development quantum from 110 to up to 100 dwellings.



5 Analysis and Response to Transport Issues Raised

5.1 The transport concerns raised by Interested Parties have been carefully reviewed. However, it is important to note that transport and highway matters did not form a reason for refusal of planning application HPK/2024/0481.

5.2 The following sections consider the principal transport concerns raised by Interested Parties.

Traffic Generation

5.3 A recurring concern raised by Interested Parties relates to the level of traffic that would be generated by the proposed development and the consequential impact upon the local highway network.

5.4 The Transport Assessment estimated that a development of 110 dwellings would generate approximately 57 two-way vehicle movements during the weekday morning peak hour and 59 two-way vehicle movements during the weekday evening peak hour. These figures represent the total traffic generated by the development and include all inbound and outbound vehicle trips.

5.5 It is important to recognise that the application site formerly accommodated Glossopdale Community College. The Transport Assessment estimated that the former school use generated approximately 157 two-way vehicle movements during the weekday morning peak hour and 44 two-way vehicle movements during the weekday evening peak hour.

5.6 Consequently, when compared with the site's former lawful use, the proposed residential development would result in approximately 100 fewer vehicle movements during the weekday morning peak period and only a modest increase of approximately 15 vehicle movements during the weekday evening peak period.

5.7 As the appeal proposal now seeks permission for up to 100 dwellings rather than 110 dwellings, the actual traffic generation associated with the appeal scheme would be lower than that assessed within the Transport Assessment.

Impact on the Local Highway Network and Congestion

5.8 Several representations refer to existing congestion within Glossop and express concern that development traffic would exacerbate existing conditions on Talbot Road, North Road, Fauvel Road, Woodhead Road and the wider highway network.

5.9 Whilst it is acknowledged that limited, localised congestion can occur at certain locations within Glossop during peak periods, the assessment of a development proposal must be based upon its likely impact rather than existing traffic conditions alone.

5.10 The Transport Assessment demonstrated that the proposed development would generate a relatively modest level of traffic and that, when considered against the former use of the site as a secondary school, the net impact on the surrounding highway network would be limited. The Local Highway Authority reviewed the submitted assessment and accepted both the methodology and conclusions. The Highway Authority concluded that the application would not have a severe residual cumulative impact on the highway network



and that there would not be an unacceptable impact on highway safety or a severe impact on congestion.

- 5.11 Several Interested Parties refer specifically to the operation of the Talbot Road/Fauvel Road/Woodhead Road junction and the Talbot Road/North Road junction. These concerns were considered as part of the Transport Assessment and the subsequent review undertaken by the Local Highway Authority. Having reviewed the submitted evidence, the Highway Authority accepted the conclusions of the Transport Assessment and raised no objection to the development. There is therefore no technical evidence to indicate that the operation of these junctions would be materially affected by the proposed development.

Cumulative Development Impacts

- 5.12 A number of representations express concern regarding the cumulative effect of this development when considered alongside other residential developments within Glossop.
- 5.13 The Transport Assessment was prepared in accordance with established industry guidance and was reviewed in detail by the Local Highway Authority. The Highway Authority expressly considered the cumulative impact of the development and concluded that the proposal would not result in a severe residual cumulative impact on the highway network.
- 5.14 In the absence of any objection from the statutory Highway Authority, there is no technical evidence to indicate that the cumulative impact of the proposed development would be unacceptable.

Accessibility and Sustainable Travel

- 5.15 Some Interested Parties have suggested that future residents would be heavily reliant upon the private car for day-to-day journeys.
- 5.16 The site occupies a sustainable location within Glossop and benefits from access to a range of local services, facilities and public transport opportunities. Existing bus stops are located immediately adjacent to the site on Talbot Road and are served by regular local bus services. Glossop railway station is also easily accessible for pedestrians and cyclists from the site and provides connections to Manchester and the wider rail network.
- 5.17 In addition, the development is supported by a residential Travel Plan which will be secured through planning condition and monitored in accordance with the requirements of the Local Highway Authority. Furthermore, the Statement of Common Ground confirms that the site represents a sustainable location and is in close proximity to local services, facilities, amenities, bus services and Glossop railway station.

Highway Safety

- 5.18 A number of Interested Parties have expressed concern that additional traffic could adversely affect highway safety.
- 5.19 The Transport Assessment included a review of personal injury collision data for the local highway network. This identified only four recorded personal injury collisions within the study area during the five-year assessment period, none of which were serious or fatal. No personal injury collisions were recorded on Talbot Road adjacent to the application site.



- 5.20 The Highway Authority reviewed the submitted collision analysis and concluded that there was no evidence that the proposed development would have an unacceptable impact on highway safety.
- 5.21 Furthermore, the proposed principal site access has been assessed and accepted by the Highway Authority, including the proposed visibility splays and access geometry.
- 5.22 Accordingly, there is no technical evidence to suggest that the proposed development would result in an unacceptable impact on highway safety.

Parking

- 5.23 Concerns have also been raised regarding the adequacy of parking provision and the potential for overspill parking on surrounding roads.
- 5.24 Parking provision will be considered in detail at reserved matters stage. However, the Highway Authority has recommended conditions requiring the provision of vehicle parking, electric vehicle charging infrastructure and cycle parking facilities in accordance with details to be approved by the Local Planning Authority.
- 5.25 There is therefore no evidence to suggest that the development would give rise to unacceptable parking impacts.

Conclusion to Analysis of Transport Issues Raised

- 5.26 Having regard to the findings of the Transport Assessment, the position of the Local Highway Authority, and the agreed position set out within the Statement of Common Ground, there is no technical evidence to demonstrate that the proposed development would result in an unacceptable impact on highway safety or a severe impact on the operation of the highway network. Indeed, it is agreed between the Appellant and High Peak Borough Council that there are no highways or transportation issues in dispute in relation to the appeal proposals.



6 Conclusion and Statement of Truth

- 6.1 Interested Parties have raised concerns relating principally to traffic generation, congestion, highway safety, cumulative development impacts, parking and reliance upon the private car.
- 6.2 These matters have been assessed in detail within the Transport Assessment submitted in support of the application and reviewed by Derbyshire County Council in its role as Local Highway Authority.
- 6.3 The Highway Authority concluded that the development would not result in an unacceptable impact on highway safety and would not give rise to a severe impact on congestion or the operation of the highway network. No objection was raised to the application on transport grounds.
- 6.4 The Statement of Common Ground agreed between the Appellant and High Peak Borough Council confirms that there are no highways or transportation issues in dispute in relation to the appeal proposals.
- 6.5 Furthermore, the appeal proposal seeks permission for up to 100 dwellings, representing a reduction from the 110 dwellings assessed within the Transport Assessment. Having independently reviewed the proposed access arrangements, I conclude that they provide a safe, appropriate and functional access strategy for all intended user groups and are suitable to accommodate the operational requirements of the proposed development
- 6.6 Accordingly, the transport assessment of the appeal proposals is considered robust and conservative.
- 6.7 For these reasons, and having regard to the conclusions of the Transport Assessment, the position of the Local Highway Authority and the agreed position set out within the Statement of Common Ground, it is my professional opinion that the proposed development would not result in an unacceptable impact on highway safety and would not give rise to a severe impact on the operation of the highway network.

Statement of Truth

- 6.8 I confirm that the facts stated in this Transport Technical Note are true. The opinions expressed are my true and complete professional opinions.

Signed:

Matt Rudman BEng (Hons) CEng FCIHT

Director, Rappor Consultants Ltd

Date: 20 July 2026

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- Notes:**
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 - Ordnance Survey, (c) Crown Copyright 2026. All rights reserved. Licence AC0000808122.
 - Drawing to be read in conjunction with all other drawings. Any discrepancies are to be reported to the engineer 5 working days in advance of undertaking any work.
 - The layout is subject to detailed design, capacity testing, ground investigations & earth modelling, road safety audit, utilities & services and confirmation of land ownership.
 - Use of the drawing does not absolve the client from their responsibilities in regards to health & safety and CDM regulations.

- Key:**
- Bollards to prevent vehicular access
 - Blister tactile paving
 - Tramline corduroy tactile paving
 - Ladder corduroy tactile paving

P01	20.07.26	Original Issue	JM	CB	MR
Rev	Date	Details	By	Chkd	Appd

rappor



rappor.co.uk

CLIENT:	Carter Jonas				
PROJECT:	Talbot Road Glossop				
TITLE:	Proposed Active Travel Connection Talbot Road				
STATUS:	For Information				Scale @ A3 1:250
DRAWING NO:	2607063-RAP-XX-XX-DR-TP-3201				REVISION: P01

4. Ecology Technical Note



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ECOLOGY REBUTTAL

Prepared by: Nicholas Bell BA (Hons) MCIEEM

Evidence in Response to

Appeal Comments

Glossop Community College, Lower Site, Talbot Road,

Glossop

Appeal Reference: 6006040



Prepared on behalf of:

Allen Shepherd of Derbyshire County Council [the Appellant]

June 2026



Report No:	Date	Revision	Author	Checked	Approved
15974_R02		-	Nicholas Bell BA (Hons) MCIEEM	John Moorcroft BSc. MSc. MCIEEM CEnv.	Hazel Murrells BSc (Hons) MSc MCIEEM CEnv



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Section 2: Rebuttal to Appeal Comments

Section 3: Conclusion

Appendix 1: Photographs

Appendix 2: Great Crested Newt Habitat Suitability Index (HSI)



Section 1: Introduction

Context

- 1.1. This report provides a rebuttal to Appeal Comments and the Inspectors Pre-Conference Note at “Glossop Community College, Lower Site, Talbot Road, Glossop” (the ‘Appeal site’), in relation to a planning appeal (6006040) regarding a proposed housing development at the Appeal Site.
- 1.2. The rebuttal provides counter evidence to the objections raised in the Appeal Comments and the matters raised in the Inspectors Pre-Conference Note. It provides justification for the methodologies, scope and ecological works undertaken as part of the Appeal site’s planning application (HPK/2024/0481).



Section 2: Rebuttal to Appeal Comments

- 2.1. The following section responds to objections raised by the Appeal Comments in the order in which they are presented. The Appeal Comments were made by the Interested Parties to the Planning Inspectorate (PINNS) and are accessible via the Planning Portal¹.
- 2.2. The Inspectors Pre-Conference Note raises the requirement for the Appellant to address matters raised by interested parties during the course of the planning application and following the submission of the appeal; one of which being related to ecology, which was “Effect on wildlife”. It is considered that the overall effect on wildlife is robustly covered in the following evidence which addresses the specific Interested Party comments.
- 2.3. **Appeal Comment – Interested Party 10:**

“This area is home to various species of animals which are regularly spotted on the site. This includes owls and bats amongst various other birds.

Have relevant wildlife surveys been carried out and are the reports available to view?

The central area of the site regularly floods and for the majority of the year this creates a natural pond which is rife with wildlife.

There will undoubtedly be large numbers of animals displaced. With the large number of other local green spaces that have already been built on, plus other ongoing proposals, these animals will simply have nowhere to go as there will not be enough green space left on the land”.

- 2.4. **Appeal Comment – Interested Party 19:**

“I am concerned about the planning proposals for the Glossopdale School site for a number of reasons:

*-the area is currently home to a wide range of birds and animals, including owls and bats, and the destruction of this site would seriously destroy the natural environment and habitat
- this includes a large natural pond with nesting birds each year”*

NB – other comments raised by Interested Party 19 do not pertain to ecology and biodiversity.

Tyler Grange Response

Relavant Surveys

¹ Planning Portal [online] [Accessed 24/06/2026]: <https://www.planningportal.co.uk/>



- 2.5. Tyler Grange became involved at the Appeal site in July 2023, when they were engaged by the Appellant to act as ecological consultant to establish the ecological baseline, inform the evolution of the project layout and advise on necessary further ecological work and mitigation, in the lead up to the planning application. The following provides dates of ecological works and reporting in chronological order. The methods used during the following works followed best practice guidance and methodology, which are discussed where relevant below.
- 2.6. Tyler Grange undertook a desk based assessment in July 2023²; whereby records of designated sites and records of protected and priority species were purchased and interrogated for the Appeal site and surrounding landscape. The aim of the data search is to collate existing ecological records for the Appeal site and adjacent areas. Obtaining existing records is an important part of the ecological assessment process as it provides information and data that may not be apparent during the single Extended Phase 1 / UKHabs Survey. The following areas of search around the boundary of the Appeal site were applied:
- 2 km for protected and priority species, national statutory designated sites and non-statutory designated sites, and;
 - 10 km for Internationally designated sites.
- 2.7. The full results of the desk study are detailed within the Preliminary Ecological Appraisal (PEA)³ report and summarised within the relevant section below.
- 2.8. An ‘Extended’ Phase 1 survey was carried out on the 1st August 2023 by Nick Bell BA (Hons), a suitably experienced ecologist and Full member of CIEEM. The methods used during the walkover survey followed methods used in an ‘Extended’ Phase 1 habitat survey⁴ and entailed recording the main plant species and classifying and mapping habitat types with reference to the Habitat Definitions provided by the UK Habitat Classification Working Group⁵.
- 2.9. Additionally, the ‘Extended’ Phase 1 survey included a badger survey and the habitats identified were evaluated for their potential to support other legally protected and notable fauna species. Where access allowed, adjacent habitats were also considered in order to assess the site within the wider landscape and to provide information with which to assess possible impacts within the context of the site boundary.
- 2.10. All habitats were assessed utilising the relevant condition criteria for the relevant habitat type under the Biodiversity Net Gain (BNG) Statutory Metric⁶, which included confirming

² Purchased Desk Study Data received on 26th July 2023 from Derbyshire Biological Records Centre (DBRC)

³ Tyler Grange Preliminary Ecological Appraisal Report: 15974_R01_PEA_NB_120824

⁴ Joint Nature Conservation Committee (2010). Handbook for Phase 1 habitat survey - a technique for environmental audit. JNCC, Peterborough.

⁵ UKHab Ltd. (2023). UK Habitat Classification Version 2.0 (at <https://www.ukhab.org>)

⁶ Biodiversity Net Gain Metric Tools [online]: <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>



'pass' / 'fail' criteria taken from the UK Habitat/Phase 1 methodology⁵. The full results of the Extended Phase 1/ UKHabs Survey are detailed in the PEA³ and summarised below.

- 2.11. Alongside the 'Extended' Phase 1 / UKHabs Survey, a Preliminary Bat Roost Assessment (PBRA) of trees on the Appeal site was undertaken. The PBRA was undertaken on 1st August 2023 and in line with best practice guidelines and methodology at the time⁷; note that 'Bat Surveys for Professional Ecologists 4th Edition'⁸ was released after the survey date, whereby different terminology and guidelines for assessing for the presence of roosting bats was published.
- 2.12. It should be noted that 'Phase 2' surveys were not undertaken. For protected and notable bats, birds and amphibian species, further surveys were scoped out of the assessment, this was due to a combination of habitats of low suitability and lack of impacts on those habitats (further detail on impacts is described below). This was in line with best practice guidelines from the Chartered Institute of Ecology and Environmental Management (CIEEM), which advises on the importance of scoping when undertaking ecological impact assessments⁹: "A PEA can be undertaken in a variety of contexts, often as a preliminary assessment of likely impacts of a development scheme. It can help the project proposer and planning authority to agree the appropriate scope of any subsequent impact assessment or determine that ecological issues will not be significant in determining the application"
- 2.13. Subsequently an updated Extended Phase 1 / UKHabs survey was undertaken on 14th July 2026 by Nick Bell. The survey followed best practice guidance⁴ on habitat survey and there were no limitations. The scope of the survey was to confirm that habitats were largely as they were previously recorded in 2023.
- 2.14. The update survey is considered robust and in line with CIEEM's advice note on the lifespan of ecological reporting and surveys¹⁰; which recommends undertaking update survey(s) if three years have lapsed since the original survey/assessment. It is important to note that the Local Planning Authority raised no concerns or disputed the level of survey effort for the original assessment in 2023, and both the 2023 and 2026 assessment were conducted in accordance with best practice guidelines at the time of assessment.
- 2.15. Achieving a biodiversity net gain is directly in accordance with the High Peak Local Plan¹¹, which has a specific Biodiversity Policy (Policy EQ 5), which "encourages development to include measures to contribute positively to the overall biodiversity of the Plan Area".

⁷ Bat Surveys for Professional Ecologists: Good Practice Guidelines 3rd Edition; Bat Conservation Trust: Collins, J. (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines. 3rd edition. Bat Conservation Trust, London.

⁸ Bat Surveys for Professional Ecologists: Good Practice Guidelines 4th Edition: <https://www.bats.org.uk/resources/guidance-for-professionals/bat-surveys-for-professional-ecologists-good-practice-guidelines-4th-edition>

⁹ Guidelines for Ecological Impact Assessment in the UK and Ireland: <https://cieem.net/resource/guidelines-for-ecological-impact-assessment-ecia/>

¹⁰ Chartered Institute for Ecology and Environmental Management (CIEEM): Advice Note on the lifespan of ecological reports and surveys.

¹¹ High Peak Local Plan: highpeak.gov.uk/media/160/The-High-Peak-Local-Plan-Adopted-April-2016/pdf/cjThe_High_Peak_Local_Plan_Adopted_April_2016.pdf?m=1514473710280



Summary of Survey Results

- 2.16. The data search returned two Internationally designated Natura 2000 sites within 10 km of the site, no statutory designations (such as Sites of Special Scientific Interest (SSSI)) and 11 non-statutory designated sites within 2 km of the site. Impacts on Internationally designates sites were considered unlikely for the reasons detailed in Paragraph 4.1 of Section 4 of the PEA³. Impacts on non-statutory designated sites were also considered unlikely, largely due to there being sufficient enough barriers (the site is largely encompassed by development) for the dispersal of flora and fauna from the Appeal site to the Local Wildlife Sites.
- 2.17. The data search returned the following:
- No protected or notable bird species at the Appeal site;
 - No bat roost records relating to the Appeal site; and,
 - No records of Great Crested Newts (GCN) within 2 km of the Appeal site, however there were three ponds recorded within 250 m of the Appeal site, which could support GCN and notable amphibians.
- 2.18. The Extended Phase 1/ UKHabs Survey found that the dominant habitat at the Appeal site comprised fine rubble and hardstanding (a result of the demolished high school building); this habitat was assessed as being of negligible ecological importance.
- 2.19. There were three other habitat types recorded at the Appeal site, which were:
- Hedgerows (local ecological importance) located on the Appeal site boundaries;
 - Modified grassland (negligible ecological importance), to the south of the Appeal site, where the former high school sports pitches were located; and,
 - Scattered trees (local ecological importance), generally located to the north of the Appeal site.
- 2.20. The habitat survey data gathered during the Extended Phase 1 / UKHabs survey was used to calculate the site's Biodiversity Net Gain (BNG) score, by identifying the baseline habitats and measuring against the proposed post-development habitats as illustrated on the Parameters Plan¹³. The Statutory Biodiversity Metric¹² demonstrated a substantial biodiversity net gain of +144.01% in habitat units and a +167.37% in hedgerows units. As the assessment was based on a Parameters Plan¹³ a number of assumptions and caveats were made with regard to the post-development habitat types, however, considering the substantial net gain, it is considered that there is enough capacity within the proposals to achieve the minimum +10% net gain, once detailed design comes forward.

¹² Statutory biodiversity metric tools and guides: <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>



- 2.21. The Extended Phase 1 /UKHabs Survey also recorded the presence of, or potential for protected and notable species that could be affected by the proposed development. Species which were considered likely absent from the Appeal site were scoped out of the assessment, based on professional judgement following consideration of the habitats within the Appeal site, signs of species presence and data search records. The following species were identified as being potentially affected by the proposals:

Bats

- 2.22. The central area of the Appeal site was considered largely unsuitable for commuting and foraging bats (hardstanding/ rubble). While the boundary vegetation (hedgerows) provide some commuting and foraging potential, the hedgerows were found to be located close to sources of lighting (main roads, housing) and were therefore assessed as offering low suitability for commuting and foraging bats. For this reason, additional bat survey, in the form of bat activity surveys were not undertaken based on the low suitability of the habitat and lack of impacts to those habitats (as discussed below).
- 2.23. There were however 11 trees with bat roosting potential. Some trees housed artificial bat boxes (assumed to have been installed when the high school was operational), while other trees had natural bat roosting features (full details within the PEA³).

Impacts on Bats

- 2.24. The Parameters Plan¹³ includes the retention of boundary hedgerows and therefore, with appropriate safeguarding during construction (secured through a Construction Environment Management Plan CEMP) and the inclusion of a Sensitive Lighting Plan to ensure habitat features remain unlit during the Appeal site's operation, it was considered unlikely that there would be adverse impacts on foraging and commuting bats.
- 2.25. The Parameters Plan¹³ includes the retention of all 11 trees with bat roosting potential. Providing appropriate safeguarding during construction (secured through a CEMP) and appropriate safeguarding during operation (secured through a Sensitive Lighting Plan), adverse impacts on roosting bats was considered unlikely and therefore no aerial/emergence surveys were undertaken.

Birds

- 2.26. As the dominant habitat type within the centre of the Appeal site was rubble/ hardstanding, it was considered largely unsuitable habitat for breeding and non-breeding birds. The boundary hedgerows and trees were however considered suitable for breeding and non-breeding birds.

Impacts on Birds

¹³ Revised Parameters Plan, Drawing Number: 10592-LDA-XX-XX-DG-UD-3001-P01



- 2.27. The boundary vegetation and trees were the only habitats considered to provide suitable breeding habitat for notable bird species and suitable habitat for non-breeding bird species (such as berry-eating overwintering thrushes); the boundary hedgerows and scattered trees shall be retained within the Parameters Plan¹³. Providing that the retained habitats are safeguarded during construction (secured through an appropriately worded CEMP) and safeguarded during operation (through an appropriately worded Landscape Ecological Management Plan (LEMP) or Habitat Management and Monitoring Plan (HMMP)) adverse impacts on breeding and non-breeding birds were considered unlikely and therefore further Phase 2 surveys were not considered necessary, in line with CIEEM best practice guidelines⁹, which states “continue to reding the scope, scoping out (excluding) potential effects that are no longer considered likely to be significant”.

Great Crested Newt and Amphibians

- 2.28. There were no ponds or permanent waterbodies at the Appeal site. Onsite habitats were considered to be of low suitability for amphibians in their terrestrial phase. There were three ponds within 250 m of the Appeal site. Although the desk study returned no records of GCN within 2 km of the Appeal site, the ponds could support notable amphibians.
- 2.29. During the update habitat survey, two small waterbodies were recorded, which were not present in 2023. Both had an approximate depth of 10cm, with no submerged or emergent aquatic vegetation. The waterbodies, as recorded in July 2026, were considered unsuitable for breeding GCN and notable amphibians. A Great Crested Newt Habitat Suitability Index¹⁴ (HSI) survey was conducted on the waterbodies, both scored 0.33, which is a ‘Poor’ suitability rating (Appendix 2). The waterbodies scored poorly on ‘Pond Area’ (i.e. size), ‘Water Quality’, ‘Waterfowl Effect’, ‘Terrestrial Habitat’ and ‘Macrophyte Cover’.

Impacts on Amphibians

- 2.30. Although there are three ponds within 250 m of the Appeal site which could be suitable for notable amphibians, it was considered that the main roads and houses surrounding the Appeal site would form substantial barriers for the dispersal of amphibians from the ponds, to the Appeal site. The temporary waterbodies onsite were considered largely unsuitable for amphibians for the reasons detailed in Paragraph 2.25. Therefore, adverse impacts on notable amphibians were considered unlikely.

Other Protected and Notable Species

- 2.31. All other protected and notable species were considered likely absent from the site, through careful consideration of the Appeal site context, habitats present and lack of record centre data and lack of signs/ evidence of such species during the Extended Phase 1/ UKHabs survey.

¹⁴ ARG UK, Great Crested Newt Habitat Suitability Index (HSI): <https://www.arguk.org/get-involved/projects-surveys/great-crested-newt-habitat-suitability-index>



Central Flooded Area

- 2.32. During the Extended Phase 1/ UKHabs survey on 1st August 2023, no flooded area was recorded, and all vegetation was representative of dry habitats (i.e. no floral species indicative of aquatic habitats were recorded).
- 2.33. Two small waterbodies were present during the 2026 updated habitat survey, the first being approximately 3x3m, the second being approximately 4.5x4m; both were shallow with an approximate depth of 10cm (Photographs provided in Appendix 2). Although the presence of two waterbodies was confirmed, no vegetation indicative of aquatic habitats was recorded. This could be evidence of the waterbodies either being impermanent or too shallow to support submerged and emergent aquatic vegetation.
- 2.34. Given the lack of aquatic vegetation recorded at the Appeal site, it is possible that the flooded areas relate to temporary, seasonally wet areas. It is also possible that the lack of aquatic vegetation is the result of the impermanent/semi-permanent waterbodies being too shallow to support aquatic vegetation, or a combination of the two.
- 2.35. Both scenarios (either impermanence or shallow depth) may result in a short-term increase in feeding resources, such as insects, for birds and bats, but it is considered unlikely that this would result in a substantial, long-term and sustained benefit for the faunal species considered to be present at the Appeal site.
- 2.36. Therefore, the presence of a temporary, seasonally wet or small, shallow permanent areas of the Appeal site does not change the assessment of habitats and does not change the assessment of protected and notable species.

Displacement of Animals

- 2.37. The ecological assessment initially considered bats, birds and GCN/ amphibians to be potentially adversely impacted by the proposed development.
- 2.38. The habitats which bats and birds are considered to be reliant upon at the Appeal site are the boundary hedgerows and scattered trees; these features shall be retained, buffered and provided with safeguarding during construction (CEMP) and operation (LEMP/ HMMP) as demonstrated in the Parameters Plan¹³, and therefore displacement of protected and notable bat and bird species is considered unlikely.
- 2.39. As detailed in Paragraph 2.30, although there are three ponds within 250 m of the Appeal site, there are substantial barriers for dispersal from the ponds, to the Appeal site and therefore considered likely absent. Displacement of protected and notable amphibians from the Appeal site is therefore considered unlikely.



Section 3: Conclusion

- 3.1. The objections make reference to whether relevant surveys have been conducted at the Appeal site. Tyler Grange have undertaken an appropriate ecological assessment, based on best practice methodologies and guidance.
- 3.2. The objections raise concerns over the presence of protected species, such as bats and birds. The ecological assessment found there to be suitable habitat for both species, however, the suitable habitat is restricted to the Appeal site boundary features (hedgerows and scattered trees), which shall be retained as part of the Parameters Plan¹³ proposals. Providing appropriate habitat safeguarding is implemented during construction and an appropriate Sensitive Lighting Strategy is implemented during operation, adverse impacts on protected bat and bird species are considered unlikely.
- 3.3. The objections raise concerns over potential displacement of species. The ecological assessment demonstrated that habitats of suitability for the protected and notable species considered to be present at the Appeal site are being retained and therefore displacement of protected and notable species is considered unlikely.



Appendix 1: Photographs



Photograph 1: Waterbody 1; approximately 3x3m, 10cm deep.



Photograph 2: Waterbody 2; approximately 4.5x4m, 10cm deep.



Appendix 2: Great Crested Newt Habitat Suitability Index (HSI)

ARGUK GCN HSI Calculator				
	Pond Name	Example		
	Grid Ref	SK123456	WB1	WB2
SI No	SI Description	SI Value	SI Value	SI Value
1	Geographic location	1.00	0.5	0.5
2	Pond area	0.50	0.1	0.1
3	Pond permanence	0.90	1	1
4	Water quality	1.00	0.33	0.33
5	Shade	1.00	1	1
6	Water fowl effect	1.00	0.01	0.01
7	Fish presence	1.00	1	1
8	Pond Density	0.65	0.9	0.9
9	Terrestrial habitat	1.00	0.33	0.33
10	Macrophyte cover	0.90	0.3	0.3
HSI Score		0.88	0.33	0.33
Pond suitability (see below)		Excellent		
Categorisation of HSI Score by Lee Brady				
HSI Score		Pond Suitability		
< 0.50		Poor		
0.50 - 0.59		Below average		
0.60 - 0.69		Average		
0.70 - 0.79		Good		
> 0.80		Excellent		
Based on ARGUK advice note 5 - Great Crested Newt Habitat Suitability Index				





**Tyler
Grange**



5. Drainage Technical Note

Re: **Technical Note Summary to support Public Inquiry,**
Application ref HPK/2024/0481

The following note has been prepared to summarise the Flood Risk and Drainage proposals for the above site and address concerns over the adequacy of the drainage proposals submitted.

Adept Consulting Engineers were appointed in summer 2023 to prepare a Flood Risk and Drainage Strategy to support the outline planning application for residential properties on the site. The initial report was completed in September 2023 for the planning pre-application submission and was then updated to suit pre-application comments, updated site plans and Lead Local Flood Authority (LLFA) comments through the planning process.

LLFA comments

The LLFA made two rounds of comments on the proposed details on 26th June 2025 and later on 28th August 2025. A summary of the points raised are noted below;

26th June 2025 response

Adept updated the FRA to address each point in turn as noted below with LLFA points in red with our actions below each point.

1. *Properties around the boundary at flood risk (particularly to the southwest)*

Adept updated Section 6.4.1 of the FRA to acknowledge the baseline flood risk to properties surrounding the site, with particular reference to those located along the southwestern boundary, as shown in the surface water flood risk mapping. This area coincides with the route of the existing culvert, which provides an opportunity to connect land drainage to convey water safely off-site. The current flood risk is a result of local topography and lack of a maintained connection to the buried culvert

2. *Safe diversion of overland/spring flows and engineered point of discharge*

Sections 6.4.2–6.4.6 were revised to set out the design parameters for managing overland and spring flows. This includes interception and conveyance via shallow ditch and/or land drains along the northern and western boundaries, routing flows to the existing culvert at the southwest low point and maintaining

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safe conveyance off-site without increasing risk to adjacent properties.

3. *Culvert condition/connectivity and basin drainage levels*

Section 4.1.8 has been updated to reflect findings from the latest CCTV survey (report and video mapping), which traced the culvert further downstream and noted localised root ingress and standing water.

Section 4.1.9 confirms that the basin outlet and culvert are at compatible levels to allow gravity discharge, with the basin invert to be set to achieve positive outfall. This addresses the concern regarding basin elevation relative to the culvert.

4. *Fallback option if the culvert cannot be utilised*

A new subsection in the Drainage Strategy (4.1.11) outlines the approach if the LLFA confirms the culvert cannot be used. United Utilities (UU) has indicated that discharge to the Talbot Road surface water sewer may be acceptable in that scenario, which would require a pumped solution due to site topography. Space for a pumping station has been identified in the southwest corner, and this would be designed in consultation with UU.

5. *Appropriate evidence of how the site will drain*

Section 4.1.8 now explicitly references the appended CCTV survey report, video footage and mapping of the culvert alignment. These provide confirmation of the proposed outfall location. Should the culvert be ruled out, UU's conditional acceptance of discharge to the Talbot Road sewer has been noted in the contingency section.

28th August 2025 response

The LLFA responded to the amended FRA positively, acknowledging the additional information provided and conditionally recommended approval of the scheme. Four drainage related planning conditions were put forward by the LLFA to be addressed at Reserved Matters stage

The recommended planning conditions are below;

1. No development shall take place until a detailed design and associated management and maintenance plan of the surface water drainage for the site, in accordance with the principles outlined within:

a. Adept. (Aug) 2025. Drainage Strategy & Flood Risk Assessment, Talbot Road, Glossop. 00.23181-ACE-ZZ-ZZ-RP-C-0001 Rev P5. including any subsequent amendments or updates to those documents as approved by the Flood Risk Management Team

b. And DEFRA's Non-statutory technical standards for sustainable drainage systems (March 2015), have been submitted to and approved in writing by the Local Planning Authority."

Reason: To ensure that the proposed development does not increase flood risk and that the principles of sustainable drainage are incorporated into this proposal, and sufficient detail of the construction, operation and maintenance/management of the sustainable drainage systems are provided to the Local Planning Authority, in advance of full planning consent being granted.

2. "No development shall take place until a detailed assessment has been provided to and approved in writing by the Local Planning Authority, to demonstrate that the proposed destination for surface water accords with the drainage hierarchy as set out in paragraph 56 Reference ID: 7-056-20220825 of the planning practice guidance. and to obtain a full understanding of the spring within the site and any associated mitigation requirements."

Reason: To ensure that surface water from the development is directed towards the most appropriate waterbody in terms of flood risk and practicality by utilising the highest possible priority destination on the hierarchy of drainage options. The assessment should demonstrate with appropriate evidence that surface water runoff is discharged as high up as reasonably practicable in the following hierarchy:

I. into the ground (infiltration);

II. to a surface water body;

III. to a surface water sewer, highway drain, or another drainage system;

IV. to a combined sewer.

And to ensure that development will be safe from flood risk including from groundwater and natural springs.

3. "Prior to commencement of the development, the applicant shall submit for approval to the LPA details indicating how additional surface water run-off from the site will be avoided during the construction phase. The applicant may be required to provide collection, balancing and/or settlement systems for these flows. The approved system shall be operating to the satisfaction of the LPA, before the commencement of any works, which would lead to increased surface water run-off from site during the construction phase."

Reason: To ensure surface water is managed appropriately during the construction phase of the development, so as not to increase the flood risk to adjacent land/properties or occupied properties within the development.

4. “No development shall take place until an assessment is undertaken of the existing culverted watercourse identified to be the point of surface water discharge to determine its condition, capacity and connectivity demonstrating no increase in flood risk up or downstream.”

Reason: To ensure the culverted watercourse has the capacity to accept flows from the new development and that it is connected to an existing, functioning, drainage network that can accept flows for the lifetime of the development.

The conditions noted are to be expected at this stage and the fourth condition is specific to covering the adequacy of the downstream culverted watercourse. The updated FRA addressing the LLFA comments was not referred to in the committee report but we believe all drainage and flood related comments were adequately discussed and addressed through the consultation process.

Managing surface water on the site through interception of existing springs, new drainage infrastructure and restricting surface water discharge in all storm events to the greenfield run-off rate will reduce the flood risk caused by the site post development.

Public Consultation Responses

A number of consultation responses were received that covered drainage and flooding, a summary of the comments raised is noted below;

- The land is noticeably wet.
- The development could increase flood risk.
- The site falls significantly from north to south.
- During heavy rainfall, both Fauvel Road and North Road act as channels conveying surface water downhill.
- Water naturally ponds at lower areas around Spire Hollin.
- The submitted Flood Risk Assessment (FRA) is said to identify medium to high surface water flood risk
- Poor-quality gardens and drainage design on new-build estates.
- Waterlogging and flooding within gardens.
- Residents resorting to artificial grass, block paving and hard surfacing.
- Reduced infiltration increasing runoff and flood risk.
- Concern that another 110 homes would further worsen existing flooding problems in Glossop

- Development practices often prioritise houses over functioning drainage systems.
- Further development may encourage more impermeable surfacing, worsening runoff and flooding.
- Drainage infrastructure on North Road is "ancient".
- Existing drains have already been overloaded by previous housing developments.
- Further housing would place additional pressure on the drainage network.

It is the responsibility of the LLFA to address these concerns during the planning consultation process. We do believe that these concerns have been addressed through our consultation with the LLFA who have adequately conditioned the need for further information at the next stage.

- The topography of the site has been noted and new drainage will be designed to intercept both new drainage and consider overland flows.
- The likelihood for springs on the site which has been acknowledged and can be addressed through intercepting these and directing to the culvert
- Current Flood risk has been noted and we believe this is partly due to the lack of connectivity and maintenance of the culverted watercourse that runs through the site. Further survey work of this is recommended to ensure it is in a suitable condition and repairs should be carried out where necessary if required.
- Surface water run-off from the newly drained site will be restricted to greenfield flows which are significantly less than the previous school site and the current site. Surface water storage systems will be installed to hold back water during all storm events.
- Although we cant address the channelling of water along Fauvel Road and North Road, The ponding on Spire Hollin we believe is potentially due to lack of connection to the culvert and maintenance of it. This matter should be addressed to the LLFA for them to review and action.
- The latest Sustainable Urban Drainage Systems Regulations and need to LLFA approval at the next stage will ensure that the detailed drainage design system serving the new estate will not increase the risk of flooding on site or result in a risk of flooding offsite.

Next Steps for Reserved Matters

Generally provide information outlined in the four planning conditions proposed. This would involve infiltration testing on site and further survey work on the culverted watercourse downstream of the site. Should the watercourse be inadequate UU have

accepted a discharge to their sewer. This would be agreed with the LLFA and UU during any reserved matters application.

The public comments are noted and will be addressed through the reserved matters application and is the responsibility of the LLFA to approve the final solution. The newly designed drainage system should address all of the on site concerns and some work may be required to the culverted watercourse which would fall under riparian responsibility and suggest residents reach out to the LLFA for guidance on this.

We trust that the above notes address your comments in full.

Yours sincerely,

Richard Parker B.Eng(Hons)
Director

20th July 2026

For and on behalf of Adept Consulting Engineers

6. Development Appraisal Statement

DEVELOPMENT APPRAISAL STATEMENT

Proposed Residential Development, Glossop, High Peak

Derbyshire County Council
July 2026

Carter Jonas

Date: July 2026

Client: Derbyshire County Council

Job Number: J0097252

Contact: Sarah Cox

The conclusions in this report reflect Carter Jonas LLP's professional opinion at the time of writing, based on the scope and information available then. It does not account for any changes that may have occurred since.

You should be aware that the report is specific to the project and purpose for which we were engaged. It should not be used for other projects or variations, and any such use is at the user's own risk.

Information provided by the Client and third parties has been assumed accurate. While reasonable care was taken, Carter Jonas LLP accepts no liability for any errors or omissions resulting from incorrect data.

We would remind you that the report is intended for the Client's use under the agreed terms. If shared with authorities or third parties, we accept no liability for any reliance placed on it by others.

Project Ref:	J0097252	J0097252
Status:	Draft	Final
Issue/Rev:	01	02
Date:	17.07.2026	21.07.2026
Prepared by:	JM	JM
Checked by:	SC	SC

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1. INTRODUCTION

- 1.1 Carter Jonas LLP has been instructed by Derbyshire County Council to undertake a development appraisal for planning purposes of land at Talbot Road, Glossop, and to consider the relative merits of a number of alternative development scenarios.
- 1.2 The purpose of this report is to assess the development potential of the site, focusing primarily on the residential-led options and considering the financial implications of alternative community infrastructure scenarios where relevant:
- A residential-led scheme comprising 100 dwellings
 - A mixed-use scheme comprising 66 dwellings and a new playing field; and
 - A mixed-use scheme comprising 68 dwellings and a new leisure centre
- 1.3 The appraisal has focused on development viability and financial outcomes rather than quantifying wider social and health benefits arising from community facilities. The assessment considers the housing delivery, affordable housing provision, planning obligations, community benefits and residual land values associated with each scenario.
- 1.4 A key consideration throughout the assessment is viability. Development viability plays a critical role in determining whether a scheme can realistically be brought forward and delivered. Whilst community infrastructure can provide public benefits, the cost of delivering such facilities must be balanced against the impact on housing delivery, affordable housing provision and overall scheme viability.
- 1.5 The report has been prepared by James Mohammed, Partner at Carter Jonas LLP, who specialises in the acquisition, promotion and disposal of development land throughout Yorkshire and the North of England. Based in Leeds, James has more than 20 years of experience advising landowners, developers and investors on how to maximise land value through strategic planning, targeted marketing and carefully structured transactions.
- 1.6 James has significant expertise in both development land agency and consultancy, with particular experience in residential and mixed-use development opportunities. He regularly advises on strategic and immediate development sites, including subject-to-planning transactions, and works closely with planning, legal and technical consultants to help position sites effectively, reduce development risk and optimise value.
- 1.7 Prior to joining Carter Jonas as a Partner in January 2026, James was Head of Residential Development (Yorkshire & North East) at JLL, where he led advice on major land transactions across the region. He previously held the position of Associate Partner at Allsop LLP, following earlier surveying roles with Dacre, Son & Hartley and Colliers International. James is a Professional Member of the Royal Institution of Chartered Surveyors (RICS) and holds a BSc (Hons) in Real Estate Management.
- 1.8 The conclusions of this report are based on the assumptions and appraisal information available at the date of preparation and should be considered as a comparative assessment for planning purposes.
- 1.9 I confirm that I James Mohammed am a Chartered Surveyor and Professional Member of the Royal Institution of Chartered Surveyors (MRICS). This Development Proof has been prepared independently in my capacity as a qualified development surveyor and reflects my professional opinion based on the information available at the date of this report. I confirm that I have the requisite expertise in development appraisal, land valuation and viability matters, have acted in accordance with the RICS Rules of Conduct, have no conflict of interest, and that the facts stated and opinions expressed are true to the best of my knowledge and professional judgment.

2. VALUATION COMPARISON

2.1 Three development scenarios have been appraised in order to understand the relationship between housing delivery, community infrastructure provision and land value generation. The scenarios were produced based on a capacity assessment by architects LDA Design.

- 100 dwelling scheme
- 68 dwelling scheme and leisure centre
- 66 dwelling scheme and playing field

2.2 The analysis demonstrates a clear correlation between development intensity and the value generated by the site. Whilst the delivery of community facilities can provide public benefits, reducing the developable area available for housing inevitably impacts the scheme's ability to generate value and support associated planning obligations.

2.3 Of the three options assessed, the 100 dwelling scheme generates by far the highest land value and overall housing delivery, including the highest number of affordable homes and the strongest financial performance. The 66-dwelling + playing field option significantly reduces land value. The 68 dwelling + leisure centre option creates a significant negative land value and the need for additional external funding to deliver it. The viability of these scenarios is considered further below.

Item	66 Dwellings + Playing Field	68 Dwellings + Leisure Centre	100 Dwellings
Total Dwellings	66	68	100
Affordable Homes	20	20	30
Affordable Housing %	30%	30%	30%
Gross Development Value	£21.48m	£22.32m	£32.43m
Developer Profit	£3.96m	£4.24m	£5.99m
Residual Land Value	£1.51m	£-10.28m*	£5.08m
Land Value per Acre	£127,801/ac	Negative	£430,926/ac
Community Asset Delivered	Playing Field	Leisure Centre	None retained
Housing Units Lost vs 100-unit scheme	34	32	—
Affordable Homes Lost vs 100-unit scheme	10	10	—

Affordable Housing Impact

2.4 **100 Dwellings provides**

- 6 x 1-bed affordable homes

- 24 x 2-bed affordable homes
- **30 affordable dwellings total**

2.5 66 Dwellings + Playing Field provides

- 4 x 1-bed affordable homes
- 16 x 2-bed affordable homes
- **20 affordable dwellings total**

2.6 Loss Compared with 100-Dwelling Scheme

- 10 fewer affordable homes
- 33% reduction in affordable housing numbers

2.7 68 Dwellings + Leisure Centre provides:

- 4 x 1-bed affordable homes
- 16 x 2-bed affordable homes
- **20 affordable dwellings total**

2.8 Loss Compared with 100-Dwelling Scheme

- 10 fewer affordable homes
- 33% reduction in affordable housing numbers

2.9 Both the community facility options sacrifice approximately one-third of the affordable housing output that would otherwise be delivered under the 100-unit scheme.

Community Benefits and Contributions

2.10 In this section I have considered what each scheme offers in terms of community benefits and contributions.

2.11 The table below compares the planning contributions each scheme will provide, not including the affordable housing delivery, detailed above.

Contribution	66 Dwellings + Playing Field	68 Dwellings + Leisure Centre	100 Dwellings
Healthcare Contribution	£66,000	£68,000	£100,000
Pitch Contribution	£13,200	£13,600	£20,000
Leisure Centre Contribution	£72,802	£75,005	£110,302
Play Contribution	£18,099	£18,648	£27,423

Contribution	66 Dwellings + Playing Field	68 Dwellings + Leisure Centre	100 Dwellings
Parks & Gardens Contribution	£45,028	£46,392	£68,224
Allotments Contribution	£6,628	£6,829	£10,043
Sports & Recreation Contribution	£52,089	£53,667	£78,923
SEND Contribution	£59,032	£60,821	£89,442
Library Contribution	£5,116	£5,271	£7,752
Travel Monitoring Fee	£4,175	£4,301	£6,325
Total Contributions	£342,169	£352,534	£518,434

2.12 The table shows the 66 dwellings and playing field scheme would deliver £176,265 less than the 100 dwellings scheme, which is a reduction of 34%. The 68 dwellings and leisure centre scheme would deliver £165,900 less than the 100 dwellings scheme, which is a reduction of 32%.

2.13 The table only includes the planning contributions; it excludes the costs of:

- The **sports field provision** within the 66-dwelling option
- The **million leisure centre** within the 68-dwelling option

Land Value Comparison

2.14 Residual land value provides a useful measure of the comparative performance of each development scenario and indicates the value available to the landowner following deduction of all development costs, planning obligations and developer's profit.

2.15 The appraisal demonstrates the most significant distinction between the options.

Scheme	Residual Land Value
100 Dwellings	£5.085m
66 Dwellings + Playing Field	£1.508m
68 Dwellings + Leisure Centre	-£10.280m

2.16 Compared with the 100-dwelling option:

2.17 66 Dwellings + Playing Field

- Land value falls by **£3.58m**
- Reduction of approximately **70%**

2.18 68 Dwellings + Leisure Centre

- Land value falls by approximately **£15.36m**
 - Creates a substantial land value deficit.
- 2.19 From a viability perspective the appraisal identifies a positive residual land value in two options:
- The 100 dwelling scheme maximises land value and housing delivery.
 - The 66 dwelling and playing field scheme remains viable but significantly suppresses land value.
- 2.20 The leisure centre scenario has been tested for comparison purposes but generates a significant negative residual land value and would require substantial public subsidy. It is therefore not considered a commercially deliverable development proposition in its current form. The viability of the remaining two options is considered further below.
- 2.21 The appraisal identifies a clear distinction between the three development scenarios in terms of housing delivery, affordable housing provision, community infrastructure and financial performance. As such, the principal consideration is not solely the scale of community benefit provided by each option, but whether that benefit can be delivered in a financially sustainable and realistic manner.
- 2.22 The appraisal identifies a clear relationship and trade-off between housing delivery and community infrastructure provision.
- The **100-dwelling scheme** maximises housing delivery, affordable housing provision, planning contributions and land value.
 - The **66-dwelling plus playing field scheme** retains outdoor sports provision whilst realising a positive but residual land value, albeit with reduced housing delivery and a substantially lower land value.
 - The **68-dwelling plus leisure centre scheme** delivers the largest community asset, but its cost renders the scheme unviable (without even comparing to benchmark land value) without significant external funding.
- 2.23 When considering the viability of a scheme in the planning context, it is necessary to compare the residual land value generated against the benchmark land value: see PPG reference ID 10-014-20190509.
- 2.24 I have considered the viability evidence underpinning the adopted local plan. This approach accords with national policy and guidance. The High Peak Local Plan Viability Testing (2014) generally uses a benchmark value of £200,000 per acre for Glossopdale (although higher land values are used in the High Peak Affordable Housing Viability Assessment). I would comment this benchmark is lower than we would expect for a location which has seen limited residential development and where sales values demonstrate it is a good market location. It is also lower than I would expect for the appeal site, given its location and characteristics. Accordingly, this is a robust and conservative approach
- 2.25 Applying the £200,000 benchmark to the three scenarios we have appraised, only the 100 dwellings scheme would be deemed viable, as shown in the table below. The obvious import of this conclusion is that a developer considering the appeal site (and to whom DCC must sell to generate the value uplift) would only consider the 100 dwelling scheme to be viable. Such a developer is unlikely to purchase an unviable site (and certainly, if they did, it would be for a price much below the benchmark land value, thus reducing DCC's return).

Item	66 Dwellings + Playing Field	68 Dwellings + Leisure Centre	100 Dwellings
Residual Land Value	£1.51m	-£10.28m*	£5.08m
Land Value per Acre	£127,801/ac	Negative	£430,926/ac

- 2.26 In addition to the viability of the three schemes we also need to consider the marketability of them too. The 66 dwellings and 68 dwellings schemes, when accounting for the affordable housing requirements would only provide 46 and 48 open market dwellings respectively. At these low numbers, interest from the volume house builders would diminish significantly and realistically they would only appeal to small to medium (SME) housebuilders.
- 2.27 Our experience of selling sites below 70 dwellings is the market is challenging as the SME housebuilders are struggling with increased build and finance costs and slow sales rates. As such they are more selective of what sites they take on and more of an issue is they do not want to be overly exposed to the market and so tend to acquire new sites where they can back-to-back with the completion of their existing site to limit holding costs and manage their return on capital.
- 2.28 The same challenges face the volume house builders but not to the same degree. There is still a healthy appetite for them to acquire sites in good locations, but with a clear focus on their return on capital the general preference is for sites of 100 to 150 dwellings.
- 2.29 A scheme of 100 dwellings would be considered ideal in size as it large enough for them to commit the time and resources but small enough to not overly expose them to the market.
- 2.30 We would be a lot more confident from a marketing perspective of receiving a good level of interest and offers in the 100 dwellings scheme in comparison to the other two.

3. HIGH-LEVEL OVERVIEW OF BRINGING A RESIDENTIAL DEVELOPMENT SITE FORWARD

- 3.1 Bringing a residential development site like this from an initial land opportunity through to a completed and occupied neighbourhood is a lengthy and often complex process. Depending on a number of factors the overall programme can range from 4 to 6 years.

Outline Planning Permission (0 - 6 months)

- 3.2 Once the outline planning application is approved and ratified, both the landowner and Council will need to agree and sign the S106 agreement.

Detailed Design and Technical Approvals (Circa 6 months to 12 months)

- 3.3 The site requires reserved matters approval and further technical work is required to produce detailed engineering and construction designs.
- 3.4 This includes highways, drainage, utilities, earthworks, structural elements, landscaping and public realm design. Additional approvals may be needed from highway authorities, drainage authorities, utility providers and building control bodies.
- 3.5 Although some detailed design work starts before planning permission is granted, the post-consent technical stage often takes 6 months to 1 year before construction can begin.

Infrastructure Delivery and Site Preparation (12 – 18 months)

- 3.6 Many developments require significant enabling works before homes can be constructed.
- 3.7 Activities commonly include:
- Site clearance and demolition
 - Ground remediation
 - Earthworks and regrading
 - Installation of drainage systems
 - Utility infrastructure
 - New roads and junction improvements
 - Ecological mitigation measures
 - Strategic landscaping
- 3.8 For a site of this size this depending on the outcome of the surveys carried out during the planning, infrastructure delivery and site preparation could take anywhere between 3 and 6 months.

Housebuilding and Construction (18 – 30 months)

- 3.9 Once serviced parcels become available, residential construction can begin.
- 3.10 This stage includes the delivery of market housing, affordable housing, open spaces, community facilities and associated infrastructure. Development is often phased to align with market demand and sales absorption rates.

- 3.11 A scheme of 100 homes should be completed within around 2 to 2.5 years, assuming a build rate of approximately 4 homes per month.
- 3.12 Construction programmes are influenced by factors such as labour availability, material supply, funding, market conditions and infrastructure dependencies.

Sales, Occupation and Community Creation (runs alongside construction)

- 3.13 Occupation usually begins before the entire development is completed. Homes are marketed and handed over in phases, allowing new residents to move into the community while additional parts of the site remain under construction.

Completion, Adoption and Long-Term Stewardship (1–5 years after final construction)

- 3.14 The final stage involves the completion and adoption of roads, drainage systems and public infrastructure by the relevant authorities where applicable.
- 3.15 Open spaces, ecological areas and shared facilities may be transferred to management companies or local authorities responsible for their long-term maintenance.
- 3.16 Even after the final house is occupied, it is common for legal agreements, maintenance obligations and infrastructure adoption processes to continue for 1–5 years before the development is fully closed out.

4. SUPPORTING NOTE FOR RESIDENTIAL DEVELOPMENT

- 4.1 Based on the development appraisal for the land at Talbot Road, Glossop, there is a strong case that a residential led development would deliver substantially greater benefits to the landowner and the wider community than using the site solely as a sports playing field. The proposed scheme would provide 100 new homes, including 30 affordable homes, alongside significant financial contributions towards local infrastructure and community facilities.
- 4.2 The residential scheme provides a broad range of direct community benefits through Section 106 contributions. The appraisal includes contributions towards:
- Healthcare facilities (£100,000)
 - Playing pitch improvements (£20,000)
 - Leisure centre improvements (£110,302)
 - Children's play facilities (£27,423)
 - Parks and gardens (£68,224)
 - Allotments (£10,043)
 - Sports and recreation facilities (£78,923)
 - Special Educational Needs and Disabilities (SEND) provision (£89,442)
 - Library services (£7,752)
 - Travel monitoring and sustainable transport measures (£6,325)
- 4.3 These contributions total more than £518,000 and will fund improvements across a range of community assets that benefit existing and future residents. Importantly, the development would also provide funding for improvements to nearby playing fields and sports facilities, meaning the scheme supports outdoor recreation without sacrificing the delivery of much need private and affordable housing.
- 4.4 The proposed development includes:
- 6 one-bedroom affordable homes
 - 24 two-bedroom affordable homes
- 4.5 This represents 30 affordable dwellings within the scheme and responds directly to housing need within Glossop and the wider High Peak area. Affordable housing is one of the most significant public benefits that a development can provide, helping local families, key workers and younger households access suitable accommodation in an increasingly challenging housing market.
- 4.6 The residential scheme would also:
- Deliver 100 new homes in a sustainable location.
 - Create jobs during the construction period.
 - Generate spending within the local economy.
 - Increase Council Tax revenues.
 - Support local shops, services and schools.
 - Make efficient use of land while retaining investment into local recreational provision through planning obligations.

- 4.7 The appraisal demonstrates that the development generates a residual land value of approximately £5.68 million, equating to approximately £481,000 per acre across the 11.8-acre site.
- 4.8 In contrast, retaining the site as a sports field would not generate a comparable capital receipt and would instead require substantial upfront expenditure.
- 4.9 Information provided by consultants STRI suggests that providing new sports pitches on the site would cost in the region of £725,000 to £775,000, before accounting for drainage requirements. Given the site's characteristics and the importance of ensuring year round usability, substantial drainage and ground engineering works may be required. These costs could increase the overall expenditure significantly beyond the current estimate.
- 4.10 Furthermore, playing fields generally require:
- Ongoing maintenance and management.
 - Grass cutting and pitch upkeep.
 - Drainage maintenance.
 - Periodic refurbishment and improvement works.
 - Revenue funding for long-term operation.
- 4.11 Accordingly, a playing field proposal represents both a significant capital cost and an ongoing financial liability, rather than a financially sustainable asset.
- 4.12 To conclude, in planning, community and financial terms, the residential development represents the more beneficial option. The scheme would deliver 100 homes, including 30 affordable homes, together with over £500,000 of infrastructure and community contributions, including funding towards local sports and recreation facilities.
- 4.13 At the same time, it would generate a land receipt of approximately £5.68 million for the landowner, providing funds that could be used to discharge debts as Mr Allen explains.
- 4.14 By comparison, the provision of a new sports playing field would require a substantial capital investment of between £725,000 and £775,000 before drainage costs, with ongoing maintenance liabilities and no comparable financial return. Consequently, the residential scheme offers a much greater overall public and private benefit whilst still contributing towards improvements to sporting and recreational facilities elsewhere in the community.

5. FUTURE DEVELOPMENT IN GLOSSOP

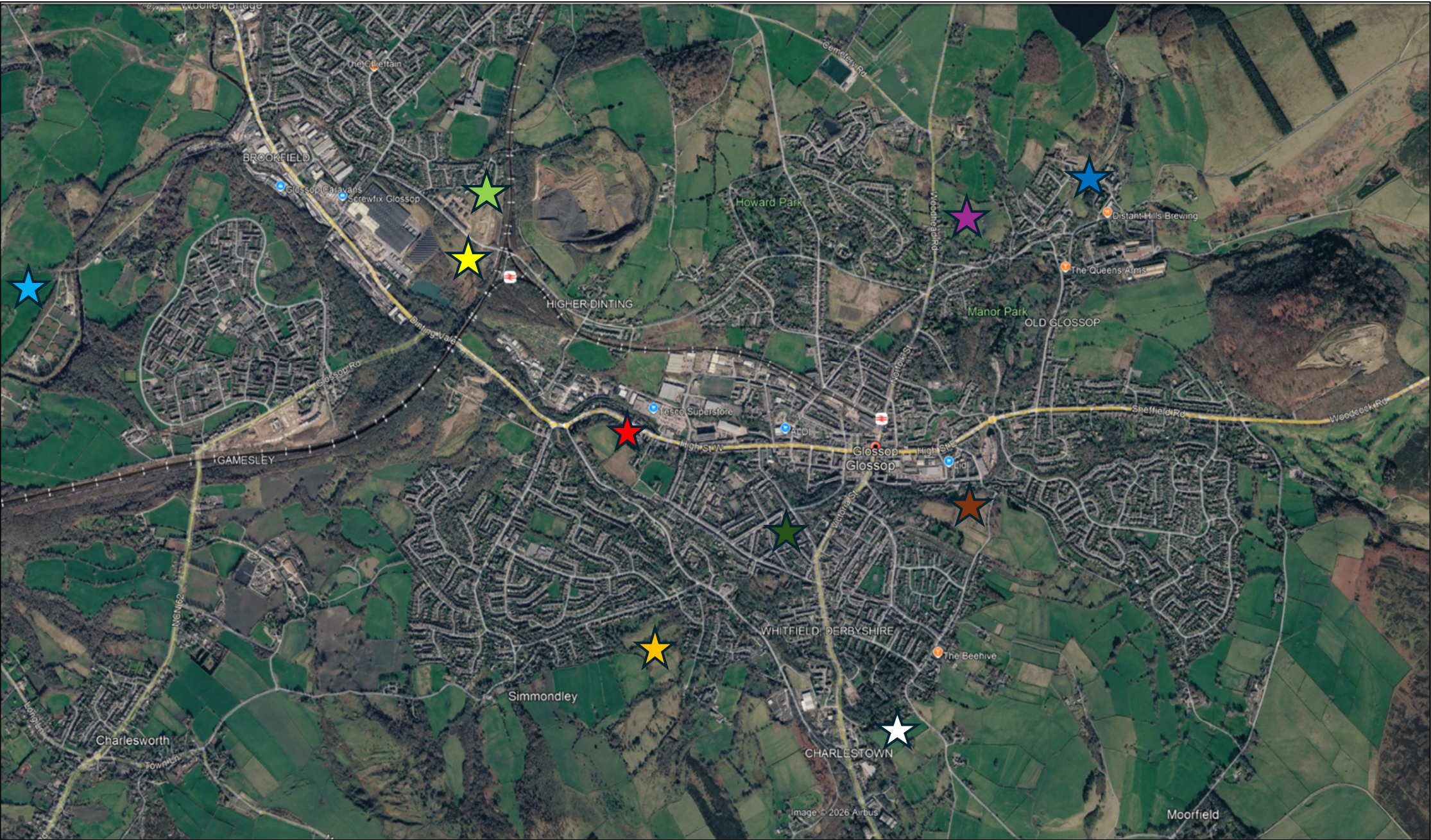
- 5.1 Glossop continues to experience development pressure due to its attractive market position on the edge of the Peak District National Park and its strong commuter links to Greater Manchester. As opportunities for large-scale development within the town become increasingly limited, future housing growth is expected to be focused on a relatively small number of strategic sites capable of delivering meaningful housing numbers.
- 5.2 Glossop is constrained by a combination of topography, Green Belt designations, areas of countryside protection and the existing urban form of the town. As a result, opportunities for large-scale residential growth are relatively limited and future housing delivery is likely to be concentrated on a small number of sites that are capable of being promoted through the emerging Local Plan process. The accompanying plan (provided as **Appendix A1** to this report) identifies a number of locations that I consider are likely to be promoted and therefore may need be considered for future development by the Council, although a detailed review of ownership, technical constraints and deliverability of competing sites has not formed part of this commission
- 5.3 Based on our experience advising landowners, developers and housebuilders across the North of England, the development market will generally favour sites that adjoin the existing built-up area, have good access to established infrastructure and services, and can be delivered without significant abnormal costs or substantial conflict with strategic planning policies. Whilst a number of sites identified around Glossop may be promoted through the Local Plan process, several are affected by Green Belt, countryside or strategic gap designations, whilst others have a history of unsuccessful residential promotion. These factors are likely to influence how favourably they are viewed by both the local planning authority and the development industry.
- 5.4 Against this backdrop, the Talbot Road site is considered to compare favourably with many of the alternative development opportunities identified in the accompany table within **Appendix A2** and appears to possess a number of characteristics commonly associated with deliverable residential allocations.
- 5.5 The site is well related to the existing urban area, is of a size capable of delivering a meaningful housing allocation and, importantly, has the ability to provide a substantial quantum of new housing in a highly constrained market. At a time when local planning authorities are under increasing pressure to identify deliverable housing sites, land capable of providing housing at scale is often afforded significant weight during plan-making exercises.
- 5.6 Whilst it is anticipated that a number of the sites shown on the accompanying plan will be promoted by landowners during future Local Plan reviews, not all are likely to emerge as realistic allocations. In contrast, the Talbot Road site possesses many of the characteristics developers typically seek when assessing strategic residential opportunities, including scale, location and the ability to contribute significantly towards future housing requirements. Consequently, should further land be required to meet housing needs within Glossop, we would expect the site to be strongly positioned relative to competing opportunities and to attract considerable interest from the development market.
- 5.7 More broadly, as the supply of unconstrained development land within Glossop continues to diminish, sites that can demonstrate both deliverability and the ability to make a meaningful contribution towards housing supply are likely to become increasingly important. In our opinion, the Talbot Road site falls firmly within this category and would be expected to represent one of the stronger candidates for future residential allocation should additional development opportunities be required through the Local Plan process.

APPENDICES

A.1 REVIEW OF POTENTIAL DEVELOPMENT SITES IN GLOSSOP – MAP

REVIEW OF POTENTIAL DEVELOPMENT SITES IN GLOSSOP

The accompanying plan identifies a range of sites that may be advanced for future development within Glossop

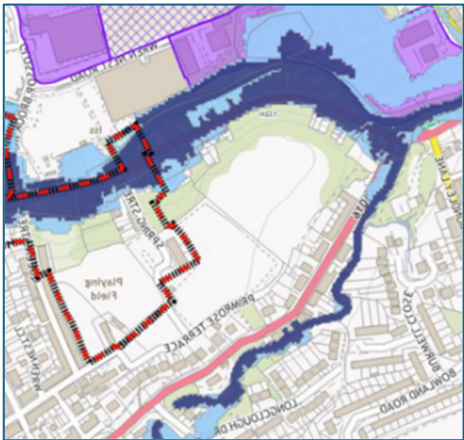
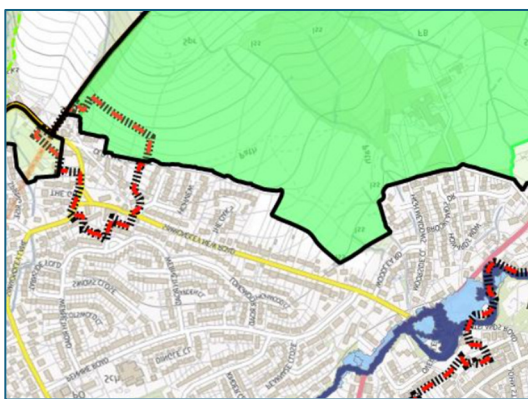


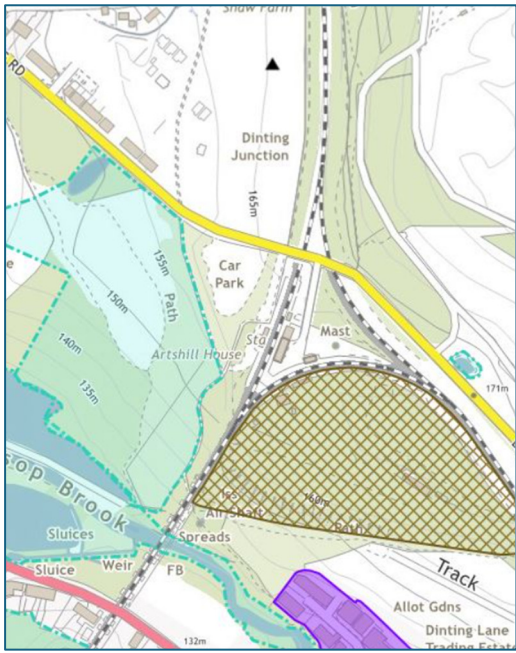
Extract from Google Earth July 2026

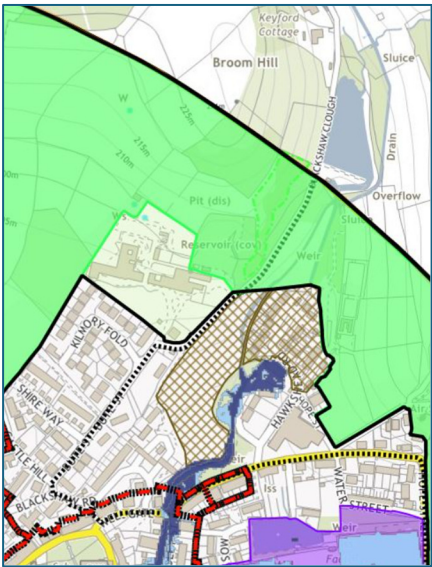
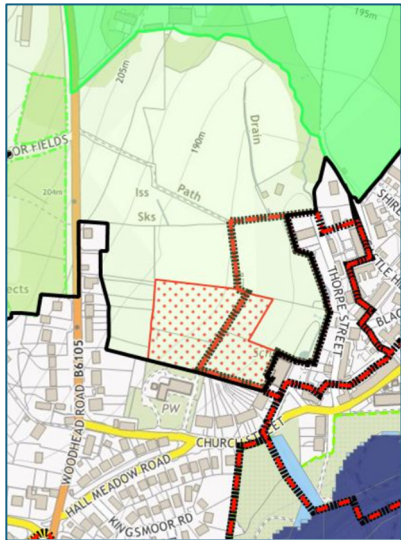
A.2 REVIEW OF POTENTIAL DEVELOPMENT SITES IN GLOSSOP – PLANNING OVERVIEW

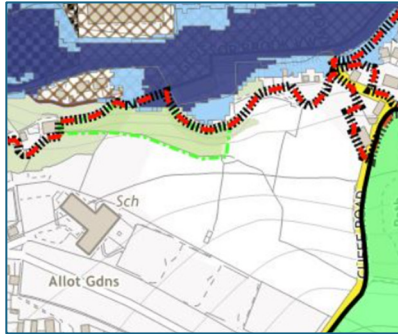
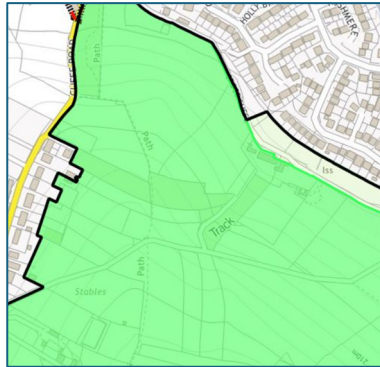
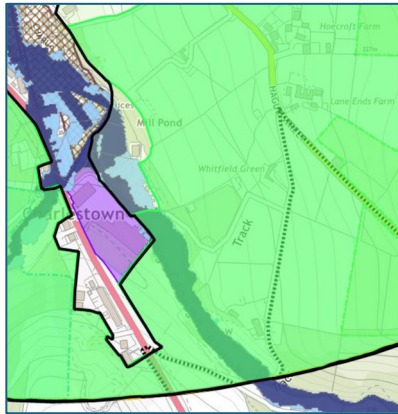
REVIEW OF POTENTIAL DEVELOPMENT SITES IN GLOSSOP

The accompanying plan identifies a range of sites that may be advanced for future development within Glossop. To support this assessment, the accompanying table presents a high-level review of each site, including its location, planning policy context, relevant planning history and principal constraints, providing an initial indication of its suitability and deliverability for future development.

Site identified	Site Address	Extract from Local Plan	Local Plan designations	Planning Application Summary	Key Planning Considerations
★	Land On The North East Side Of Primrose Lane, Glossop SK13 8EH		Approximately 13.57 acres (5.49 hectares). The site is not subject to any specific Local Plan allocation or designation. The site occupies a transitional position on the edge of the urban area and is located adjacent to: • Local Plan Area Boundary • Built-up Area Boundary • Land designated under Policies H1, E1 and S2 • Wren's Nest Conservation Area • Local Plan Sub-Area Boundary	Planning Application Reference: HPK/2018/0065 Modular Building next to existing building Planning Permission – Approved – 28th June 2018 Planning Application Reference: HPK/2018/0072 Division of existing dwelling into two dwellings with associated parking. Proposed stone porch and rear window to 2 Pikes Farm and replacement of existing glazed doors with painted hardwood windows Planning Permission – Approved- 9th April 2018 Planning Application Reference: HPK/2004/0751 Re-submission of application HPK/2004/0507 for residential development Outline Application – Refused – 15th February 2005	The site's location immediately adjoining the Built-up Area Boundary and the Wren's Nest Conservation Area suggests that any future development proposals would need to carefully consider settlement-edge impacts, heritage considerations, and compliance with relevant Local Plan policies. Its absence of a specific allocation does not preclude development but may require a robust planning justification. Technical matters should be assessed as these matters will influence the site's development capacity, viability and likelihood of securing planning permission.
★	Land North West Of Hobroyd Farm, Hobroyd, Glossop SK13 6PP		Approximately 12.20 acres (4.94 hectares). The site is located within the Local Plan Area Boundary and forms part of the Glossopdale Sub-Area. The site is designated as Countryside under Policies EQ2, EQ3 and E1, reflecting its open and undeveloped character. The entirety of the site is located within the Green Belt and is therefore subject to the restrictions of Policies EQ2 and EQ4, which seek to prevent inappropriate development and safeguard openness. The site falls within the Glossopdale Sub-Area Strategy (Policy S5), which provides the strategic planning framework for development within this part of the borough.	Planning Application Reference: HPK/0003/8238 Phase II, Simmondley New Road, Glossop Re-submission of application 037717 for the erection of 48 residential units Approved – 16th May 2000 Planning Application Reference: HPK/2013/0389 Proposed garage conversion, single storey rear extension & extend garage roof hip with new extension Planning Permission – Approved 12th September 2013 Planning Application Reference: HPK/0002/3934 Residential Development Refused – 23rd January 1986	The site's location within both the Countryside and Green Belt represents a significant planning constraint. Any proposal for residential development would need to demonstrate compliance with Green Belt policy or establish the necessary exceptional circumstances through the Local Plan process. These designations are likely to present substantial challenges to securing planning permission and may affect the site's suitability and deliverability as a future housing allocation. Technical matters should be assessed as these matters will influence the site's development capacity, viability and likelihood of securing planning permission.

Site identified	Site Address	Extract from Local Plan	Local Plan designations	Planning Application Summary	Key Planning Considerations
★	Land Lying To The South Of Dinting Road Dinting, Glossop, SK13 7EB		Approximately 5.0 acres (2.0 hectares). The site is located within the Local Plan Area Boundary and the Glossopdale Sub-Area. The site is designated as Countryside under Policies EQ2, EQ3 and E1, reflecting its open and undeveloped character. The site also falls within a designated Strategic Gap (Green Wedge) under Policy S5, which seeks to maintain separation between settlements, preserve landscape character, and prevent coalescence. The site is located within the Glossopdale Sub-Area Strategy, where Policy S5 provides the strategic planning framework for future growth and development.	No planning history of direct relevance identified.	The site's designation as both Countryside and Strategic Gap (Green Wedge) represents a significant planning constraint. Development proposals would need to demonstrate that they would not undermine the function of the Strategic Gap or adversely affect the open character of the countryside. As a result, whilst the site lies within the broader Local Plan area, the existing policy context may present substantial challenges to residential development and could affect its suitability for future allocation.
★	Shaw Farm, Glossop, SK13 6DE		Within built up area boundary	Planning history relates to the Brambles (Seddon Homes) which is currently being developed Planning Application Reference: HPK/2013/0324 Outline application for up to 93 dwellings on land at Dinting Road and Shaw Lane, Glossop. Initially refused by High Peak Borough Council in August 2013. Allowed on appeal in June 2014.	The application was refused by High Peak Borough Council in August 2013 but subsequently allowed on appeal in June 2014. In allowing the appeal, the Planning Inspector concluded that the site's sustainable location and contribution towards housing delivery outweighed the identified policy conflicts, particularly in the context of the Council's inability to demonstrate a five-year housing land supply at the time.

Site identified	Site Address	Extract from Local Plan	Local Plan designations	Planning Application Summary	Key Planning Considerations
★	Land North of 2 - 42 Winster Mews, Glossop SK13 0LU		The site is located outside the Built-up Area Boundary, where development proposals are generally assessed against countryside and settlement-edge planning policies. Adjacent land is identified under Policies H1, E1 and S2, which relate to housing, economic development and the strategic spatial framework within the Local Plan.	Planning history is limited to minor-scale applications, including the siting of a container and re-roofing works approved in 2003 and 2009. No significant development proposals or residential planning applications have been identified.	The site's position beyond the Built-up Area Boundary is likely to represent a policy constraint to residential development. Any future proposals would need to demonstrate an appropriate planning justification, having regard to the site's relationship with the existing settlement, the objectives of the Local Plan, and the wider strategy for accommodating future growth within Glossop.
★	Land West Of Hawkshead Fold Hawkshead Fold Glossop SK13 7PZ		The site is located within the Built-up Area Boundary, placing it within the established urban area of Glossop. The site is identified under Policies H1, E1 and S2, which relate to the borough's spatial strategy, housing provision and sustainable growth objectives. The site forms part of Housing Allocation G12 (Bute Street, Old Glossop), which has been specifically identified within the Local Plan for residential development.	Planning Application Reference: HPK/2022/0259 Construction of 7 new houses on vacant land to the north east of Highstones Planning Permission – Approved 1st March 2024	The site's allocation for housing under Policy G12 represents a positive planning attribute and establishes the principle of residential development in this location. Its position within the Built-up Area Boundary further supports its suitability for housing-led development, subject to compliance with site-specific design, environmental and technical requirements.
★	Land On The East Side Of Woodhead Road, Glossop SK13 7RH		The site is located within the Local Plan Area Boundary. The site is designated as Countryside under Policies EQ2, EQ3 and E1, reflecting its predominantly open and rural character. As an Area of Countryside, the site is subject to planning policies that seek to protect the landscape, character and environmental quality of the countryside whilst restricting inappropriate forms of development.	No planning history of direct relevance to the site has been identified during this high-level review. No significant residential, commercial or strategic development proposals appear to have been promoted on the site.	The site's countryside designation represents a significant planning consideration. Whilst limited forms of development may be supported where they accord with local and national planning policy, proposals for residential development would need to demonstrate a clear policy justification and carefully consider their impact on the character and appearance of the surrounding countryside.

Site identified	Site Address	Extract from Local Plan	Local Plan designations	Planning Application Summary	Key Planning Considerations
★	Lower Bank Farm, Lower Bank, Glossop SK13 8PY		The site appears to be located outside the Built-up Area Boundary and is not allocated for development within the adopted Local Plan.	Planning Application Reference: HPK/2019/0020 Erection of 38 unit housing scheme made up of 10no. 2 bed houses, 22no. 3 bed houses, 5no. 4 bed houses (37 in total) for shared ownership and 1no 3 bed bungalow (open market) and all associated car parking, landscaping and highway works Refused - 14 th July 2020	The site is located outside the Built-up Area Boundary and is not allocated for development within the adopted Local Plan. This represents a significant planning consideration, as residential development would need to demonstrate compliance with countryside policies and the wider spatial strategy for Glossop. The application was refused due to concerns regarding its adverse impact on the character and appearance of the landscape.
★	SK13 8NY		The site is located within the Green Belt and is subject to Policies EQ2 and EQ4, which seek to preserve openness, prevent urban sprawl and safeguard the countryside from inappropriate development. The site is designated as Countryside under Policies EQ2, EQ3 and E1, reflecting its open, rural character and environmental importance.	No planning history of direct relevance has been identified.	The combination of Countryside and Green Belt designations represents a significant planning constraint. Residential development would generally be regarded as inappropriate development in Green Belt terms unless very special circumstances can be demonstrated or the site is promoted through the Local Plan process.
★	The Smallholding Charlestown Glossop SK13 8NS		The site is located within the Green Belt and is subject to Policies EQ2 and EQ4, which seek to maintain openness, prevent urban sprawl and protect the countryside from inappropriate development. The site is designated as Countryside under Policies EQ2, EQ3 and E1, reflecting its undeveloped character and contribution to the rural setting of the area	Planning Application Reference: HPK/2016/0445 Small Holding , Land Off Hague Street , Hague Street , Glossop , Derbyshire , Replacement of existing agricultural building Approved – 26 th September 2016	The site's designation as both Countryside and Green Belt represents a substantial planning constraint. Development proposals would need to demonstrate compliance with Green Belt policy and carefully consider their impact on landscape character, openness and the wider countryside setting. Residential development is likely to face significant policy challenges unless supported by exceptional planning circumstances or future policy changes.

7. Correspondence between Appellant and LPA

Appendix 7 – Correspondence between Appellant and LPA

5th September 2025 – Email to Planning Officer (PO henceforth) and Head of Planning with letter of response to planning committee report, to be included in Members' Update for planning committee.
5th September 2025 – Letter received with notification of application referral to planning committee.
4th September 2025 – Email to Committee Services/PO/Head of Planning regarding planning committee letter, noting concerns this was not issued until after we queried. Highlighted concerns with communications, procedural implications, and short notice of site visit.
4th September 2025 – Email to Committee Services querying reference to letter regarding planning committee, which we have not received.
3rd September 2025 – Email to Committee Services with request to attend planning committee. Response from Committee Services confirming registration and points to note regarding the committee.
3rd September 2025 – Email to PO with comments on the maximum quantum of development sought with the application, noting that the PO's position contradicts previous comments that the quantum was too low. Email requests various clarifications and expectation that the application will be assessed as submitted.
2nd September 2025 – Email from PO with link to committee agenda and comment that the Concept Plan and levels information do not “demonstrate that the site can accommodate the up to quantum sought”. One reason for refusal listed in relation to loss of playing field. PO requests description of development be amended to a generic residential scheme to avoid a further reason for refusal.
21st August 2025 – Email to PO with updated FRA and Considerations Plan to address LLFA concern. Requested confirmation of draft reasons for refusal.
20th August 2025 – Email from PO with LLFA comments which notes a slight discrepancy between the FRA and Considerations Plan regarding surface water flooding. Flood risk and drainage considered to be insufficient to support scheme and PO proceeding with ‘in principle’ refusal given applicant's stance on the matter.
19th August 2025 – Email from PO advising they are unlikely to receive consultee response (assumed LLFA/Policy) prior to September committee deadline. Given Sport England's response, the scheme will be recommended for refusal at September planning committee.
15th August 2025 – Email to PO with copy of updated drainage documents and comments on quantum and density, and noting the existing EoT extends to 12th September.
15th August 2025 – Email from PO requesting updates on LLFA discussions, that our letter will be shared with Local Plans team, and requesting further EoT.
15th August 2025 – Email to PO advising that drainage consultant reviewed and discussing queries with LLFA. Attached a letter with our thoughts on quantum and density. Requested availability for Teams meeting.

Appendix 7 – Correspondence between Appellant and LPA

4th August 2025 – Email from PO confirming consultees notified of updated documents. Suggests awaiting consultee responses before a meeting, and acknowledges PO needs to confirm whether the quantum of development is appropriate.
29th July 2025 – Email to PO seeking update on consultation responses and committee date. Attached letter commenting on matters raised by Sport England and PO regarding principle of development. Also suggested a meeting to discuss the application.
25th July 2025 – Email to PO with updated air quality assessment and confirmed agreement to EoT to 12th September.
23rd July 2025 – Email to PO with updated highways drawings and technical note, with drainage and air quality updates to follow. Seeking client approval for further EoT.
22nd July 2025 – Email from PO advising arboriculture comments uploaded to public file on 11th July and cannot deal with any revised information without a further EoT.
4th July 2025 – Email to PO advising we will submit responses to consultee comments and requesting copy of arboriculture consultee comments. Also seeking clarification on density and quantum following PO's previous comments.
25th June 2025 – Email from PO advising application confirmed for August planning committee. LLFA likely to raise issues, and "on the matter of density, I will revert back to you on this matter..."
25th June 2025 – Email to PO commenting on outstanding consultee comments, prematurity of referring application to committee without all consultation responses and seeking clarity on PO's comments on 'effective use of land in terms of paragraph 11d'.
25th June 2025 – Email from PO providing consultee comments and noting that arboriculture and LLFA comments remain outstanding.
24th June 2025 – Email to PO confirming agreement to EoT to allow reasonable time to respond to consultee comments, which are noted as still outstanding and not available on public access.
24th June 2025 – Email from PO advising the application will remain scheduled for July planning committee and that there is a principal objection to the scheme which follows concerns raised by Sport England.
24th June 2025 – Email to PO and Head of Planning with substantive response to PO's latest email regarding EoT, recommendation to refuse and refer to next planning committee, and comments on various matters and inconsistencies from PO.
24th June 2025 – Email from PO confirming judgment referenced in her previous email, extract of HPBC Leisure and Environmental Services comments, and advising that with no EoT in place, application to be recommended for refusal and placed on July planning committee.

Appendix 7 – Correspondence between Appellant and LPA

11th June 2025 – Email to PO requesting response to previous email.
4th June 2025 – Email to PO with copy of topographic survey and provided comments on the loss of community facilities noting these were replaced with the new school at Hadfield. Also commented on density which we consider to be appropriate (36dph), noted NPPF paragraph 39, and asked for clarity on LPAs position and outstanding consultee comments
2nd June 2025 – Email from PO advising that she is exploring the principle of development and loss of community facilities. Also made comments that “a low density scheme appears inappropriate...” and requested topographic survey and an EoT to continue proactive dialogue.
2nd June 2025 – Email to PO clarifying that our planning policy response simply highlighted the sections of our planning statement which already contained appropriate commentary, along with acknowledgment of the council’s 5YHLS. Also noting that the Policy team deferred several matters to the PO for planning judgement. Requested update on outstanding consultation responses and a meeting to discuss the application.
2nd June 2025 – Email from PO advising will forward policy response to consultee, that she is still waiting on key consultee responses (e.g. LLFA) and application not ready for committee. Requested further EoT.
2nd June 2025 – Email to PO and Head of Planning requesting response and confirmation of committee date, and voicing concern with lack of response or updates.
23rd May 2025 – Email to PO providing a letter, planning policy response note, and illustrative site sections. Also requesting PO’s view on the scheme, progress update and expected committee date and recommendation.
24th April 2025 – Email to PO requesting response, particularly in light of upcoming committee date, and seeking confirmation of PO’s views on the scheme.
17th April 2025 – Email to PO requesting response.
10th April 2025 – Email to PO requesting response.
7th April 2025 – Email to PO requesting confirmation regarding requested site sections and seeking PO’s views and position on the scheme and confirming agreement to EoT.
1st April 2025 – Email from PO clarifying committee date and requesting Extension of Time in order to continue proactive negotiation.
1st April 2025 – Email to PO acknowledging receipt and querying committee date.
27 th March 2025 – Email from PO providing Planning Policy comments, confirming outstanding consultee comments, and advising on planning committee dates.

Appendix 7 – Correspondence between Appellant and LPA

11th & 26th March 2025 – Emails to PO requesting update.
26th February 2025 – Email to PO requesting update following site visit.
17 th February 2025 – Reply from PO advising of upcoming site visit.
6 th February 2025 – Email to Planning Officer (PO) asking for initial thoughts on application

Subject: FW: Speaking at Committee Agent - App ref HPK/2024/0481
Date: 05/09/2025 14:25
From: "Sarah Cox" <Sarah.Cox@carterjonas.co.uk>
To: "Richard Holliday" <richard.holliday@carterjonas.co.uk>

From: James Burnett <James.Burnett@staffsmoorlands.gov.uk>
Sent: Friday, 05 September 2025 14:21
To: Sarah Cox <Sarah.Cox@carterjonas.co.uk>
Subject: [Ext Msg] Speaking at Committee Agent - App ref HPK/2024/0481

Please find attached document

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.staffsmoorlands.gov.uk/YourData>

Sarah Cox
Carter Jonas LLP
First Floor 9 Bond Court
Leeds
LS1 2JZ

01/09/2025

Dear Sir/Madam

PUBLIC PARTICIPATION AT THE DEVELOPMENT CONTROL COMMITTEE

APPLICATION NUMBER	HPK/2024/0481
APPLICANT'S NAME	Derbyshire County Council
	Allen Shepherd
LOCATION	Glossopdale Community College Lower Site Talbot Road
	Glossop
PROPOSED DEVELOPMENT	Outline planning application for the construction of up to 110 dwellings, with all matters reserved (except principal points of access) including all associated ancillary works and engineering operations

I am writing to you to in respect of the above planning application. Which is due to be considered by the Development Control Committee on **08/09/2025** at 1.30 p.m. at **Main Hall - Buxton Methodist Church, Chapel Street, Buxton SK17 6HX**

The Council has agreed to allow interested persons an opportunity to explain briefly their views in support of or against the application prior to the Committee's consideration and determination of the application. Please note that there is a time limit of 3 minutes for representations to be made for and 3 minutes for representations to be made against the

application. If there is more than one person wishing to speak for or against an application, you will be asked to share the time, or to appoint a spokesperson.

If you would like to register to speak at the meeting, please contact Democratic Services (Tel: 01298 28400 ex. 2139 or email democratic.services@highpeak.gov.uk by 5 pm on the Wednesday before the Committee meeting. A Member of the Democratic Services team will then provide you with advice and instructions on how you will be able to access the meeting.

We will need to record your name and contact details so we can register you to speak at the Planning Committee. If others are speaking on the same application, we can—with your permission—share your contact details with them, in case you'd like to agree on one spokesperson. That's completely optional. Your details will only be used for this purpose and kept in line with our data protection policy. You can find more information about how we handle personal data on our website at www.highpeak.gov.uk/YourData or I could post/email you a copy of the full privacy notice if you want.

Please note that the Committee will carry out a site visit on the morning of the meeting during which they may need to enter your private land in order to view the site. If you have any concerns about this please contact the case officer.

A copy of the officer's report to Committee can be found on our website at:
<https://democracy.highpeak.gov.uk/ieListMeetings.aspx?CommitteeId=146>.

General information on the planning process can be found on our website at:
<https://www.highpeak.gov.uk/article/922/The-planning-process-explained>

Please note that it is not permitted to hand out photographs, plans or written statements at the meeting

Yours sincerely

Planning Support

Contact us at <https://www.highpeak.gov.uk/hp/council-services/planning-and-buildings>

Sarah Wilson

From: Richard Holliday
Sent: Friday, 05 September 2025 11:00
To: Rachel Rourke; Rachael Simpkin; Ben Haywood
Cc: Sarah Cox
Subject: Planning Committee 8th September - HPK/2024/0481 - Land at Talbot Road, Glossop [CJO-WORKSITE.FID342596]
Attachments: Letter to LPA 050925.pdf

Dear Rachael & Rachel,

Please see attached a letter which we would like to be included in the Members' Update to be issued today in relation to Monday's Planning Committee.

The letter provides our response to various matters contained within the Committee Report.

As advised yesterday, we have not yet received the committee notification letter, which we understand is sent by the planning services team rather than committee services.

Kind regards

Richard

Subject: [Ext Msg] RE: Development Control Committee - 8th September [CJO-WORKSITE.FID342596]
 Date: 04/09/2025 12:52
 From: "Rachel Rourke" <Rachel.Rourke@highpeak.gov.uk>
 To: "Richard Holliday" <richard.holliday@carterjonas.co.uk>

Hi Richard, thanks for your message, I'll update the speakers list and have asked Planning to forward to you the speaking at committee letter referred to.

Thanks. Rachel

From: Richard Holliday <richard.holliday@carterjonas.co.uk>
Sent: 04 September 2025 12:09
To: Rachel Rourke <Rachel.Rourke@highpeak.gov.uk>; Rachael Simpkin <Rachael.Simpkin@staffsmoorlands.gov.uk>
Cc: Sarah Cox <Sarah.Cox@carterjonas.co.uk>; Phoebe Gilchrist <Phoebe.Gilchrist@carterjonas.co.uk>
Subject: RE: Development Control Committee - 8th September [CJO-WORKSITE.FID342596]

Dear Rachel,

Thank you for your email and confirming that we are registered to speak. Just to clarify, it will be my colleague, Sarah Cox, who will speak, although I will be attending committee with her.

On another note, your email below references a letter (point highlighted yellow), which we have not received. Please can you provide a copy of this for our information?

Kind regards

Richard

Richard Holliday MRTPI
 Associate Partner

T: 0113 824 2379 | M: 07977 914141 | carterjonas.co.uk
 9 Bond Court, Leeds, LS1 2JZ

From: Rachel Rourke <Rachel.Rourke@highpeak.gov.uk>
Sent: Wednesday, 03 September 2025 11:02
To: Richard Holliday <richard.holliday@carterjonas.co.uk>
Cc: Sarah Cox <Sarah.Cox@carterjonas.co.uk>; Phoebe Gilchrist <Phoebe.Gilchrist@carterjonas.co.uk>
Subject: [External Message] RE: Development Control Committee - 8th September [CJO-WORKSITE.FID342596]

Dear Richard

Thanks for your email.

I confirm that I have registered you to speak in support of application HPK/2024/0481 Glossopdale Community College at the meeting of Development Control Committee on 8 September.

Please note that there is a maximum of 3 minutes to speak in support of an application and if more than one person wishes to speak you will be asked to share the time or appoint a spokesperson. If anyone else does wish to speak in support I'll let you know, the deadline to register is 5 pm on Wednesday.

Please note the following:

- The Chair will invite you by name to speak at the appropriate point, and those details will be recorded in the minutes of the meeting.
- The meeting may be recorded by representatives of the media or by members of the public.
- It is not permitted to hand out photographs, plans or written statements at the meeting.
- The letter you received inviting you to speak provides details around how we handle your data and how

you can get more information

The meeting is at 1.30 p.m. on 8 September in the main hall, Buxton Methodist Church, Market Place, Buxton, please aim to arrive by around 1.20 p.m. and register with one of my colleagues in the meeting room.

If you need anything further, please let me know.

Regards

Rachel Rourke

Rachel Rourke

Senior Democratic Services Officer

(She/Her)

Democratic Services

High Peak Borough Council and Staffordshire Moorlands District Council

Tel: **01298 28400 ex. 2139** Mob: **07880 896276** |

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www.staffsmoorlands.gov.uk | Follow SMDC on [X \(formerly Twitter\)](#) | [Facebook](#)



From: Richard Holliday <richard.holliday@carterjonas.co.uk>

Sent: 03 September 2025 10:46

To: Rachel Rourke <Rachel.Rourke@highpeak.gov.uk>

Cc: Sarah Cox <Sarah.Cox@carterjonas.co.uk>; Phoebe Gilchrist <Phoebe.Gilchrist@carterjonas.co.uk>

Subject: Development Control Committee - 8th September [CJO-WORKSITE.FID342596]

Dear Rachel,

I hope you are well.

I am not sure if we need to register in advance, but we would like to attend and speak at the planning committee on Monday 8th September in respect of planning application ref. HPK/2024/0481 (Land at Talbot Road, Glossop).

We are representing the applicant, Derbyshire County Council, and wish to speak in support of the application.

Kind regards

Richard

Richard Holliday MRTPI
Associate Partner

Carter Jonas

T: 0113 824 2379 | M: 07977 914141 | carterjonas.co.uk
9 Bond Court, Leeds, LS1 2JZ



Chartered Town Planners

Sarah Wilson

From: Richard Holliday
Sent: Wednesday, 03 September 2025 10:10
To: Rachael Simpkin
Cc: Ben Haywood; Sarah Cox; Phoebe Gilchrist
Subject: RE: HPK/2024/0481 - Land at Former Glossopdale Community College [CJO-WORKSITE.FID342596]

Dear Rachael,

Thank you for your email.

We consider that the level of detail provided is entirely appropriate for an outline application, which seeks to establish the principle of development rather than resolve detailed design matters. The application clearly states that it seeks permission for development of 'up to' a specified quantum – this sets a maximum, not a minimum, and inherently allows for flexibility in the final layout and design. The submitted concept plan and levels information demonstrate that the site is capable of accommodating this quantum in principle, and any refinement will be addressed at the reserved matters stage.

Your current position contradicts your previous comments provided by email on 2nd June 2025, where you advised that the quantum of development was too low. Despite our repeated requests for clarification, and your acknowledgements that you needed to provide such clarification, we have yet to receive a substantive response.

Please can you clarify why you believe the quantum of development cannot be delivered?

It is neither necessary nor reasonable to dilute the application description to a generic residential scheme, particularly when the evidence supports the deliverability of the proposed development. We therefore expect the application to be assessed on the basis submitted, in line with the scope and purpose of an outline planning application.

Finally, we are disappointed that the report was only shared with us yesterday afternoon, despite it having been publicly available for two working days. This delay will be raised as a point of concern in any future appeal.

We will be submitting a written response to the committee report tomorrow.

Kind regards

Richard

From: Rachael Simpkin <Rachael.Simpkin@staffsmoorlands.gov.uk>
Sent: Tuesday, 02 September 2025 16:19
To: Richard Holliday <richard.holliday@carterjonas.co.uk>
Cc: Ben Haywood <Ben.Haywood@highpeak.gov.uk>; Sarah Cox <Sarah.Cox@carterjonas.co.uk>; Phoebe Gilchrist <Phoebe.Gilchrist@carterjonas.co.uk>
Subject: [Ext Msg] RE: HPK/2024/0481 - Land at Former Glossopdale Community College [CJO-WORKSITE.FID342596]

Hi Richard,

Please find the link to the agenda below:

<https://democracy.highpeak.gov.uk/ieListDocuments.aspx?CId=146&MId=3583&Ver=4>

The concept plan and levels information doesn't demonstrate that the site can accommodate the up to quantum sought. In these circumstances, it is recommended that the application description is altered to a generic residential scheme to avoid a further reason for refusal.

Of note, the LLFA have confirmed a conditional response. Please see attached.

Accordingly, please let me know your intentions by close of play 4th September.

Kind regards,

Rachael Simpkin Senior Planning Officer (Majors & Commercial)
(She/Her)
Development Services
High Peak Borough Council and Staffordshire Moorlands District Council
Mob: **07976 753719** | Connect with me on [LinkedIn](#)
www.highpeak.gov.uk | Follow HPBC on [X \(Formerly Twitter\)](#) | [Facebook](#)
www.staffsmoorlands.gov.uk | Follow SMDC on [X \(Formerly Twitter\)](#) | [Facebook](#)

From: Richard Holliday <richard.holliday@carterjonas.co.uk>
Sent: 21 August 2025 14:39
To: Rachael Simpkin <Rachael.Simpkin@staffsmoorlands.gov.uk>; Chris Rogers (Place) <chris.rogers@derbyshire.gov.uk>
Cc: Ben Haywood <Ben.Haywood@highpeak.gov.uk>; Sarah Cox <Sarah.Cox@carterjonas.co.uk>; Phoebe Gilchrist <Phoebe.Gilchrist@carterjonas.co.uk>
Subject: RE: HPK/2024/0481 - Land at Former Glossopdale Community College [CJO-WORKSITE.FID342596]

Hi Rachael,

Thanks for your email.

We have reviewed the LLFA's comments below and understand that their concern relates to a discrepancy between the surface water flooding shown on the Considerations Plan (constraints plan – which would not form one of the approved documents in any event) and the identified surface water flood risk. We have updated the Considerations Plan accordingly (attached) and have also updated this plan within the FRA (also attached).

We believe that this addresses the LLFA's concerns outlined below and would welcome their confirmation of this. I have cc'd Chris Rogers for the LLFA's awareness.

Please could you also confirm your draft reasons for refusal so that we can review these?

Kind regards

Richard

From: Rachael Simpkin Rachael.Simpkin@staffsmoorlands.gov.uk
Sent: Wednesday, 20 August 2025 11:38
To: Richard Holliday richard.holliday@carterjonas.co.uk
Cc: Ben Haywood Ben.Haywood@highpeak.gov.uk; Sarah Cox Sarah.Cox@carterjonas.co.uk; Phoebe Gilchrist Phoebe.Gilchrist@carterjonas.co.uk
Subject: [Ext Msg] RE: HPK/2024/0481 - Land at Former Glossopdale Community College [CJO-WORKSITE.FID342596]

Hi Richard,

Please find the informal response from the LLFA below. Currently matters concerning local flood risk and drainage are considered to be insufficient to support the scheme and we are proceeding with an in principle refusal given the applicant's stance on the matter.

I'll start to put together a formal response based on the new information provided, there is one part of the Drainage Strategy & FRA that needs to be updated. The surface water flooding outlines that are shown on the 'considerations plan' drawing number J0053214_CJ_MP_PL_001_V2 do not appear to be the same scale as the drawing therefore it

does not show the modelled surface water flooding outlines and as such does not reflect the current flood risk. Can this be addressed as according to current modelling there are a number of properties that are at risk of surface water flooding but the drawing does not show this.

Kind regards,

Rachael Simpkin Senior Planning Officer (Majors & Commercial)
(She/Her)
Development Services
High Peak Borough Council and Staffordshire Moorlands District Council
Mob: **07976 753719** | Connect with me on [LinkedIn](#)
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www.staffsmoorlands.gov.uk | Follow SMDC on [X \(Formerly Twitter\)](#) | [Facebook](#)

From: Rachael Simpkin
Sent: 19 August 2025 10:09
To: 'Richard Holliday' <richard.holliday@carterjonas.co.uk>
Cc: Ben Haywood <Ben.Haywood@highpeak.gov.uk>; 'Sarah Cox' <Sarah.Cox@carterjonas.co.uk>; 'Phoebe Gilchrist' <Phoebe.Gilchrist@carterjonas.co.uk>
Subject: RE: HPK/2024/0481 - Land at Former Glossopdale Community College [CJO-WORKSITE.FID342596]

Hi Richard,

We've consulted on this, however, we are unlikely to receive a response prior to next week's committee deadline.

Given Sport England's maintained response, as per the attachment, which we are supporting, the scheme will be recommended for refusal at the forthcoming September meeting.

Ben Haywood, Head of Service ccd.

Kind regards,

Rachael Simpkin Senior Planning Officer (Majors & Commercial)
(She/Her)
Development Services
High Peak Borough Council and Staffordshire Moorlands District Council
Mob: **07976 753719** | Connect with me on [LinkedIn](#)
www.highpeak.gov.uk | Follow HPBC on [X \(Formerly Twitter\)](#) | [Facebook](#)
www.staffsmoorlands.gov.uk | Follow SMDC on [X \(Formerly Twitter\)](#) | [Facebook](#)

From: Richard Holliday
Sent: 15 August 2025 17:35
To: Rachael Simpkin
Cc: Sarah Cox ; Phoebe Gilchrist
Subject: RE: HPK/2024/0481 - Land at Former Glossopdale Community College [CJO-WORKSITE.FID342596]

Hi Rachael,

Thanks for your email.

Following my last email, the drainage consultant has updated the FRA and Drainage Strategy and prepared an accompanying note (both attached). Contrary to my previous email, these have not yet been discussed with or passed to the LLFA. We would therefore appreciate it if you could add these to the application file and consult the LLFA on these updated details, which we believe address their comments.

Further to my email below, and noting that you will be sharing our density comments with your Policy team, we would ask that our letter be reviewed alongside the Considerations Plan and Concept Plan (both attached for ease). These provide the context for the factors influencing the quantum of development, including how the site's topography and drainage characteristics present certain limitations to the site's development potential, developable area, and layout.

We note the need to confirm a further EoT should we need to go beyond the existing 12th September EoT. Could you please advise of the next committee dates, report deadlines, etc. please?

Kind regards

Richard

Richard Holliday MRTPI
Associate Partner
T: 0113 824 2379 | M: 07977 914141 | carterjonas.co.uk
9 Bond Court, Leeds, LS1 2JZ

From: Rachael Simpkin
Sent: Friday, 15 August 2025 14:18
To: Richard Holliday
Cc: Sarah Cox ; Phoebe Gilchrist
Subject: [External Message] RE: HPK/2024/0481 - Land at Former Glossopdale Community College [CJO-WORKSITE.FID342596]

Hi Richard,

Thank you for the update.

Please note that any liaison with the LLFA should be via the LPA or with at least the LPA cdd to any correspondence.

Can you ensure this undertaken going forward and I receive a copy of the correspondence undertaken with the LLFA thus far.

I shall share the density commentary with our Local Plans Team.

Please be mindful that a further EoT will need to be agreed shortly.

Kind regards,

Rachael Simpkin Senior Planning Officer (Majors & Commercial)
(She/Her)
Development Services
High Peak Borough Council and Staffordshire Moorlands District Council
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www.staffsmoorlands.gov.uk | Follow SMDC on [X \(Formerly Twitter\)](#) | [Facebook](#)

From: Richard Holliday <richard.holliday@carterjonas.co.uk>
Sent: 15 August 2025 11:54
To: Rachael Simpkin <Rachael.Simpkin@staffsmoorlands.gov.uk>
Cc: Sarah Cox <Sarah.Cox@carterjonas.co.uk>; Phoebe Gilchrist <Phoebe.Gilchrist@carterjonas.co.uk>
Subject: RE: HPK/2024/0481 - Land at Former Glossopdale Community College [CJO-WORKSITE.FID342596]

Hi Rachael,

Many thanks for your confirmation of consulting on the additional documents and a future Teams meeting to discuss any outstanding matters prior to committee referral.

As an update on the drainage queries received from the LLFA, we understand that our drainage consultant has reviewed the LLFA comments and prepared relevant responses and clarifications, which they are discussing directly with the LLFA to ensure any outstanding queries are resolved appropriately.

In the meantime, I attach a short letter outlining our thoughts with regard to quantum and density, which I would be happy to discuss.

Please could you advise of some suitable dates for a Teams meeting so that we can schedule something in our diaries in anticipation of receiving updated consultee comments.

Kind regards

Richard

Richard Holliday MRTPI

Associate Partner

T: 0113 824 2379 | M: 07977 914141 | carterjonas.co.uk

9 Bond Court, Leeds, LS1 2JZ

From: Rachael Simpkin <Rachael.Simpkin@staffs Moorlands.gov.uk>

Sent: Monday, 04 August 2025 16:43

To: Richard Holliday <richard.holliday@carterjonas.co.uk>

Cc: Sarah Cox <Sarah.Cox@carterjonas.co.uk>; Phoebe Gilchrist <Phoebe.Gilchrist@carterjonas.co.uk>

Subject: [Ext Msg] RE: HPK/2024/0481 - Land at Former Glossopdale Community College [CJO-WORKSITE.FID342596]

Hi Richard,

Thank you for earlier confirming EoT.

I have consulted on all documents recently received from you and understand the drainage information remains outstanding.

I suggest awaiting consultee responses before we meet via TEAMS, particularly on the matter of sport pitches being critical to discussions on the principle of development.

I appreciate that I also need to confirm whether the > quantum description of development is appropriate.

Kind regards,

Rachael Simpkin Senior Planning Officer (Majors & Commercial)

(She/Her)

Development Services

High Peak Borough Council and Staffordshire Moorlands District Council

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www.staffs Moorlands.gov.uk | Follow SMDC on [X \(Formerly Twitter\)](#) | [Facebook](#)

From: Richard Holliday <richard.holliday@carterjonas.co.uk>

Sent: 29 July 2025 12:54

To: Rachael Simpkin <Rachael.Simpkin@staffs Moorlands.gov.uk>

Cc: Sarah Cox <Sarah.Cox@carterjonas.co.uk>; Phoebe Gilchrist <Phoebe.Gilchrist@carterjonas.co.uk>

Subject: RE: HPK/2024/0481 - Land at Former Glossopdale Community College [CJO-WORKSITE.FID342596]

Dear Rachael,

Further to the emails below, I would be grateful if you could provide an update on the latest position. Please can you confirm whether the updated information submitted to date has been shared with consultees?

Sarah Wilson

From: Richard Holliday
Sent: Tuesday, 29 July 2025 12:54
To: Rachael Simpkin
Cc: Sarah Cox; Phoebe Gilchrist
Subject: RE: HPK/2024/0481 - Land at Former Glossopdale Community College [CJO-WORKSITE.FID342596]
Attachments: Letter of Response to LPA (July 2025).pdf

Dear Rachael,

Further to the emails below, I would be grateful if you could provide an update on the latest position. Please can you confirm whether the updated information submitted to date has been shared with consultees?

Additionally, please can you confirm that the application will not be referred to planning committee in August and will instead be referred to September committee while these final matters remain under discussion?

We attach a letter which comments on matters raised by Sport England and yourself regarding the principle of development.

As previously mentioned, we would welcome the opportunity to discuss any remaining issues and work towards a suitable resolution. We are available for a Teams call if you have availability for a short meeting, which we believe would be beneficial for all involved.

Kind regards

Richard

From: Richard Holliday
Sent: Friday, 25 July 2025 13:47
To: Rachael Simpkin <rachael.simpkin@staffs Moorlands.gov.uk>
Cc: Sarah Cox <Sarah.Cox@carterjonas.co.uk>; Phoebe Gilchrist <Phoebe.Gilchrist@carterjonas.co.uk>
Subject: RE: HPK/2024/0481 - Land at Former Glossopdale Community College [CJO-WORKSITE.FID342596]

Hi Rachael,

Further to my email on Wednesday with the additional highways documents, we now provide the updated Air Quality Assessment, taking on board the relevant consultee comments.

We can also confirm our client's agreement to an extension of time to 12th September to allow for your review of these additional documents and subsequent referral of the application to 8th September planning committee.

We will provide the drainage survey as soon as available.

Kind regards

From: Richard Holliday
Sent: Wednesday, 23 July 2025 16:37
To: Rachael Simpkin <Rachael.Simpkin@staffs Moorlands.gov.uk>
Cc: Sarah Cox <Sarah.Cox@carterjonas.co.uk>; Phoebe Gilchrist <Phoebe.Gilchrist@carterjonas.co.uk>
Subject: RE: HPK/2024/0481 - Land at Former Glossopdale Community College [CJO-WORKSITE.FID342596]

Hi Rachael,

Thank you for the update.

We have reviewed the arboricultural response and note that this raises no objections to the application, subject to conditions.

I attach updated highways drawings and a technical note to address the highways comments, and would appreciate it if these could be passed on to the relevant highways consultee.

We expect to provide an updated air quality assessment and drainage report with CCTV survey to address respective consultee comments in the next couple of days.

We have asked our client for approval to another extension of time to allow for referral to September committee and will need to confirm this with you tomorrow as we have been unable to reach them today for confirmation.

In the meantime, and subject to review of the updated highways, air quality, and drainage responses, please can you confirm your thoughts and position on the application? I know when we last emailed you were considering principle/quantum of development?

Kind regards

Richard

From: Rachael Simpkin <Rachael.Simpkin@staffsmoorlands.gov.uk>
Sent: Tuesday, 22 July 2025 15:31
To: Richard Holliday <richard.holliday@carterjonas.co.uk>
Cc: Sarah Cox <Sarah.Cox@carterjonas.co.uk>; Phoebe Gilchrist <Phoebe.Gilchrist@carterjonas.co.uk>
Subject: [Ext Msg] RE: HPK/2024/0481 - Land at Former Glossopdale Community College [CJO-WORKSITE.FID342596]

Hi Richard,

I have checked the public file and the HPBC Arb response was uploaded to the public file on the 11th July. Please accept my apologies for the delay.

The officer report deadline for the August DC Committee is the close of the week and we cannot deal with any revised information at this stage without a further EoT, which is considered to be fair and reasonable.

Please let me know by close of play tomorrow which way you wish to proceed.

Kind regards,

Rachael Simpkin Senior Planning Officer (Majors & Commercial)
(She/Her)
Development Services
High Peak Borough Council and Staffordshire Moorlands District Council
Mob: **07976 753719** | Connect with me on [LinkedIn](#)
www.highpeak.gov.uk | Follow HPBC on [X \(Formerly Twitter\)](#) | [Facebook](#)
www.staffsmoorlands.gov.uk | Follow SMDC on [X \(Formerly Twitter\)](#) | [Facebook](#)

From: Richard Holliday <richard.holliday@carterjonas.co.uk>
Sent: 04 July 2025 18:25
To: Rachael Simpkin <Rachael.Simpkin@staffsmoorlands.gov.uk>
Cc: Sarah Cox <Sarah.Cox@carterjonas.co.uk>; Phoebe Gilchrist <Phoebe.Gilchrist@carterjonas.co.uk>
Subject: RE: HPK/2024/0481 - Land at Former Glossopdale Community College [CJO-WORKSITE.FID342596]

Sarah Wilson

From: Richard Holliday
Sent: Friday, 04 July 2025 18:25
To: Rachael Simpkin
Cc: Sarah Cox; Phoebe Gilchrist
Subject: RE: HPK/2024/0481 - Land at Former Glossopdale Community College [CJO-WORKSITE.FID342596]

Hi Rachael,

Further to the emails below, we are working with the project team to review and address the relevant consultee comments.

We have instructed detailed reviews of the highways, air quality, and drainage responses to ensure any necessary information is provided. In addition, we will be submitting a response to the comments from Sport England and Leisure & Environment. While we have previously discussed and commented upon these matters within our planning statement, supplementary statement, and emails, we intend to provide additional specific commentary on these recent responses, which we continue to disagree with and consider to contain factual errors.

You previously advised that the tree officer's comments would be uploaded onto the portal however these are not yet available. Please can you forward a copy so that we can review and ensure there is no response required?

Regarding your previous comments on density and quantum of development, have you had an opportunity to review this further and are you able to advise of your position on this? As previously explained, the proposals have been developed in response to site constraints and technical input, and we consider the density to be appropriate. However, if you have any concerns, it would be helpful to understand those and discuss with you.

Kind regards

Richard

From: Rachael Simpkin <Rachael.Simpkin@staffs Moorlands.gov.uk>
Sent: Wednesday, 25 June 2025 16:46
To: Richard Holliday <richard.holliday@carterjonas.co.uk>
Cc: Sarah Cox <Sarah.Cox@carterjonas.co.uk>; Phoebe Gilchrist <Phoebe.Gilchrist@carterjonas.co.uk>
Subject: [External Message] RE: HPK/2024/0481 - Land at Former Glossopdale Community College [CJO-WORKSITE.FID342596]

Hi Richard,

As per the public file, the scheme is confirmed for the August DC Committee meeting.

The LLFA are likely to raise issues as confirmed today, and I will let you have their comments when they are available.

Apart from trees, are you expecting any other consultee comment?

On the matter of density, I will revert back to you on this matter and request further information if required.

Kind regards,

Rachael Simpkin Senior Planning Officer (Majors & Commercial)
(She/Her)
Development Services

Sarah Wilson

From: Rachael Simpkin <Rachael.Simpkin@staffs Moorlands.gov.uk>
Sent: Wednesday, 25 June 2025 16:46
To: Richard Holliday
Cc: Sarah Cox; Phoebe Gilchrist
Subject: [External Message] RE: HPK/2024/0481 - Land at Former Glossopdale Community College [CJO-WORKSITE.FID342596]

Hi Richard,

As per the public file, the scheme is confirmed for the August DC Committee meeting.

The LLFA are likely to raise issues as confirmed today, and I will let you have their comments when they are available.

Apart from trees, are you expecting any other consultee comment?

On the matter of density, I will revert back to you on this matter and request further information if required.

Kind regards,

Rachael Simpkin Senior Planning Officer (Majors & Commercial)
(She/Her)
Development Services
High Peak Borough Council and Staffordshire Moorlands District Council
Mob: **07976 753719** | Connect with me on [LinkedIn](#)
www.highpeak.gov.uk | Follow HPBC on [X \(Formerly Twitter\)](#) | [Facebook](#)
www.staffs Moorlands.gov.uk | Follow SMDC on [X \(Formerly Twitter\)](#) | [Facebook](#)

From: Richard Holliday <richard.holliday@carterjonas.co.uk>
Sent: 25 June 2025 16:37
To: Rachael Simpkin <Rachael.Simpkin@staffs Moorlands.gov.uk>
Cc: Ben Haywood <Ben.Haywood@highpeak.gov.uk>; Sarah Cox <Sarah.Cox@carterjonas.co.uk>; Phoebe Gilchrist <Phoebe.Gilchrist@carterjonas.co.uk>
Subject: RE: HPK/2024/0481 - Land at Former Glossopdale Community College [CJO-WORKSITE.FID342596]

Hi Rachael,

Thank you for your reply and for forwarding the latest consultee comments.

We note that the tree and LLFA responses have been chased but remain outstanding, while others now appear to be available online. We are aware that previous consultee comments raised no objections; however, we will review the latest comments with our consultant team and provide responses where necessary.

Given that the air quality comments were submitted two weeks ago but only became publicly available yesterday, and with responses from the tree and LLFA consultees still pending, we do not consider there is currently sufficient consultee input for you to prepare a full and robust officer's report, to provide members with the necessary detail and analysis of the relevant planning matters to enable them to make a well-informed and balanced decision on the application.

In light of this, we consider it premature to refer the application to the July committee. We note that the public access website now indicates the application is scheduled for consideration at the planning committee on 11th August 2025, and we would appreciate your confirmation that this will be the case.

Please could you also clarify your comment about wanting to "revisit making effective use of land in terms of footnote para 11d"? We would welcome your thoughts on the application of the tilted balance set out in paragraph 11d, and if there is anything else you need to assist with your assessment, please do let us know.

As previously mentioned, we are happy to arrange a Teams meeting to discuss the application and any comments you or consultees may have.

Kind regards

Richard

Richard Holliday MRTPI
Associate

T: 0113 824 2379 | M: 07977 914141 | carterjonas.co.uk
9 Bond Court, Leeds, LS1 2JZ

Classification L2 - Business Data

From: Rachael Simpkin <Rachael.Simpkin@staffsmoorlands.gov.uk>
Sent: Wednesday, 25 June 2025 12:15
To: Richard Holliday <richard.holliday@carterjonas.co.uk>
Cc: Sarah Cox <Sarah.Cox@carterjonas.co.uk>; Phoebe Gilchrist <Phoebe.Gilchrist@carterjonas.co.uk>
Subject: [External Message] RE: HPK/2024/0481 - Land at Former Glossopdale Community College [CJO-WORKSITE.FID342596]

Hi Richard,

Thank you for confirming the EoT.

Please find recently added consultee responses as per the public file, with just trees to be added. There is an AQ query from EHO to be noted.

LLFA comments are outstanding, and I have chased these.

Please let me know which ones are missing.

I'd like to revisit making effective use of land in terms of footnote para 11d.

Kind regards,

Rachael Simpkin Senior Planning Officer (Majors & Commercial)
(She/Her)
Development Services
High Peak Borough Council and Staffordshire Moorlands District Council
Mob: **07976 753719** | Connect with me on [LinkedIn](#)
www.highpeak.gov.uk | Follow HPBC on [X \(Formerly Twitter\)](#) | [Facebook](#)
www.staffsmoorlands.gov.uk | Follow SMDC on [X \(Formerly Twitter\)](#) | [Facebook](#)

From: Richard Holliday <richard.holliday@carterjonas.co.uk>

Sent: 24 June 2025 17:18

To: Rachael Simpkin <Rachael.Simpkin@staffs Moorlands.gov.uk>; Ben Haywood <Ben.Haywood@highpeak.gov.uk>

Cc: Sarah Cox <Sarah.Cox@carterjonas.co.uk>; Phoebe Gilchrist <Phoebe.Gilchrist@carterjonas.co.uk>

Subject: RE: HPK/2024/0481 - Land at Former Glossopdale Community College [CJO-WORKSITE.FID342596]

Hi Rachael,

Thank you for your reply.

We can confirm agreement to an EoT until 29th August 2025 on the basis that this would allow reasonable time for us to review and respond to consultee comments, which we note are still outstanding and not available on public access. This would also allow for sufficient time for you to prepare your officer committee report for referral to 11th August 2025 committee meeting.

Kind regards

Richard

Richard Holliday MRTPI
Associate

T: 0113 824 2379 | M: 07977 914141 | carterjonas.co.uk
9 Bond Court, Leeds, LS1 2JZ

Classification L2 - Business Data

From: Rachael Simpkin <Rachael.Simpkin@staffs Moorlands.gov.uk>

Sent: Tuesday, 24 June 2025 17:04

To: Richard Holliday <richard.holliday@carterjonas.co.uk>; Ben Haywood <Ben.Haywood@highpeak.gov.uk>

Cc: Sarah Cox <Sarah.Cox@carterjonas.co.uk>; Phoebe Gilchrist <Phoebe.Gilchrist@carterjonas.co.uk>

Subject: [Ext Msg] RE: HPK/2024/0481 - Land at Former Glossopdale Community College [CJO-WORKSITE.FID342596]

Hi Richard,

Without a further EoT, the scheme will remain scheduled for the July DC Meeting.

The caselaw should be no surprise as it has been widely reported in the planning press.

Unfortunately we cannot control the speed at which consultees respond, however, there remains a principal objection to the scheme which follows key concerns raised at the pre-application stage by Sport England.

Hope this clarifies matters.

Kind regards,

Rachael Simpkin Senior Planning Officer (Majors & Commercial)
(She/Her)

Development Services

High Peak Borough Council and Staffordshire Moorlands District Council

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www.highpeak.gov.uk | Follow HPBC on [X \(Formerly Twitter\)](#) | [Facebook](#)

www.staffs Moorlands.gov.uk | Follow SMDC on [X \(Formerly Twitter\)](#) | [Facebook](#)

From: Richard Holliday <richard.holliday@carterjonas.co.uk>

Sent: 24 June 2025 16:50

To: Rachael Simpkin <Rachael.Simpkin@staffs Moorlands.gov.uk>; Ben Haywood <Ben.Haywood@highpeak.gov.uk>

Cc: Sarah Cox <Sarah.Cox@carterjonas.co.uk>; Phoebe Gilchrist <Phoebe.Gilchrist@carterjonas.co.uk>

Subject: RE: HPK/2024/0481 - Land at Former Glossopdale Community College [CJO-WORKSITE.FID342596]

Hi Rachael,

Thank you for your email and update, though I must express our disappointment with its content.

We note your reference to 'numerous' EoT requests which we respectfully refute. As you will recall, and as documented on email correspondence between us and my colleagues, we (on behalf of our client) agreed to your initial request (dated 27th March) for an extension of time for you to consider the application and allow for outstanding consultee comments and present to planning committee in May. On 7th April, following confirmation from our client, we agreed this EoT until 30th May 2025.

On 7th, 10th, and 17th April we emailed you requesting progress updates and seeking to discuss your comments and other relevant matters relating to the determination of the application. These emails were prompted by the lack of communication from you as the appointed case officer dealing with our application.

Your subsequent request for a further EoT, received on 16th May, merely stated: *"I have replied on this point including the need for a further EoT,"* without providing any supporting detail or justification. My colleague immediately replied to this email, to seek clarification, but this email went unanswered. We followed up on 23rd May and provided site sections and a letter responding to policy comments. This email also remained unanswered or acknowledged.

On 2nd June, still without a response, we emailed again (copying in your Head of Planning) to request an update and your professional view on the application, which had by then been validated for 21 weeks. You replied the same day, confirming receipt of our documents, and noting that they had not been shared with your Policy colleagues. You also highlighted that *"In addition, you will note that we are still missing key consultee responses, including the LLFA amongst others and therefore this scheme is simply not ready to be presented to committee."* We note at the date of today's email we are still waiting for these comments. You requested a further EoT to July 2025 and, while we awaited client approval, we proposed a Teams meeting to discuss the application and consultee responses.

On 4th June, while identifying that we were seeking client approval for a further EoT, with an intention to agree, we reasonably set out our questions to understand the status of the application. This was to ensure that we could brief out client on the justification for the additional EoT request. This email, in addition to a further email I sent on 11th June have remained unanswered until your email of today.

We only became aware of Sport England's consultation response on 23rd June, and we are in the process of providing a response to you which we are hoping to send by the end of this week.

Turning first to the matter of consultee comments, it is both disappointing and frustrating that more than five months after validation of the application, consultee comments have only been provided in the last few working days. We note your reference to Tree Officer comments does not align with what is publicly available on your public access system for us to review. We also note that the LLFA have yet to comment and you previously advised that the scheme would not be ready for referral to committee without those comments.

This afternoon's communication, advising us that you intend to recommend refusal at 14th July 2025 planning committee and are finalising your report this week (in the next three working days) is deeply concerning. Our client has not been afforded any meaningful or reasonable opportunity to respond to the comments provided. This lack of engagement is both unfair, inequitable, and not in the spirit of the NPPF, as it undermines the principles of transparency and due process that should govern such discussions. It is essential that our client be given a fair chance to review and address the issues raised before any further decisions are made. I would like to draw to your attention paragraph 39 of the NPPF once again, which encourages LPAs to take a positive and proactive approach. This is not contingent upon an EoT being in place especially given that our client undertook pre-application engagement with the LPA.

I would therefore ask that you reconsider your proposed course of action and allow our client (the applicant) a reasonable period of time to respond to consultee and officer comments before any further steps are taken. Given the significance of the content of this email, I would be grateful if you could acknowledge receipt of this email and confirmation that our comments will be duly considered.

Kind regards

Richard

Richard Holliday MRTPI
Associate

T: 0113 824 2379 | M: 07977 914141 | carterjonas.co.uk
9 Bond Court, Leeds, LS1 2JZ

Classification L2 - Business Data

From: Rachael Simpkin <Rachael.Simpkin@staffs Moorlands.gov.uk>
Sent: Tuesday, 24 June 2025 12:58
To: Richard Holliday <richard.holliday@carterjonas.co.uk>
Cc: Sarah Cox <Sarah.Cox@carterjonas.co.uk>; Phoebe Gilchrist <Phoebe.Gilchrist@carterjonas.co.uk>
Subject: [Ext Msg] RE: HPK/2024/0481 - Land at Former Glossopdale Community College [CJO-WORKSITE.FID342596]

Hi Richard,

Thank you for your note and topographical plan.

Please find a link to the referenced judgment as follows: *Stoke Mandeville Parish Council, R (On the Application Of) v Buckinghamshire Council [2025] EWHC 1213 (Admin) (16 May 2025)*

Given Sport England's comments as per the public file, HPBC Leisure and Environmental Services comments below, and with no EoT in place, despite numerous requests, we are recommending refusal of this scheme, which will be placed on the forthcoming July DC Committee with my report to be completed this week. Density matters will be assessed in the round. Conservation and Tree comments have now been received and will be placed on the public file. We are expecting LLFA comments to be made available prior to the meeting.

24.06.25:

"The issue of loss of on-site recreational facilities also needs to be addressed by the applicant which includes playing field land and an old redgra surface, as stated in the current Playing Pitch Strategy. The Strategy also states that the recommended actions for the site are to ensure that any developments on the site adhere to NPPF 74 (now paragraph 104) and local planning policy.

We would therefore refer to and support the formal comments of Sport England in that the applicant needs to provide information that clearly demonstrates how the proposal will accord with policy exception 4 of Sport England's Playing Fields Policy, and we would request that the applicant work with a suitably qualified and experienced sports turf consultant to provide the necessary details of the replacement playing field.

The High Peak Playing Pitch Strategy is currently being updated so more relevant football data usage and demand will be available towards the end of the year, however, the existing PPS (2017) states that whilst overall spare capacity exists on adult pitches, a shortfall is evident in the Central and Glossopdale Analysis Area and there is a current shortfall of youth 11v11 pitches, attributed to the Central and Glossopdale analysis areas".

Kind regards,

Subject: RE: HPK/2024/0481 - Land at Former Glossopdale Community College [CJO-WORKSITE.FID342596]
 Date: 11/06/2025 13:53
 From: "Richard Holliday" <richard.holliday@carterjonas.co.uk>
 To: "Rachael Simpkin" <rachael.simpkin@staffsmoorlands.gov.uk>
 Cc: "Sarah Cox" <Sarah.Cox@carterjonas.co.uk>, "Phoebe Gilchrist" <Phoebe.Gilchrist@carterjonas.co.uk>

Dear Rachael,

Further to my email below, please could you get back to us so that we can understand the council's position and any outstanding matters?

Kind regards

Richard

Classification L2 - Business Data

From: Richard Holliday
Sent: Wednesday, 04 June 2025 15:12
To: Rachael Simpkin <rachael.simpkin@staffsmoorlands.gov.uk>
Cc: Sarah Cox <Sarah.Cox@carterjonas.co.uk>; Phoebe Gilchrist <Phoebe.Gilchrist@carterjonas.co.uk>
Subject: RE: HPK/2024/0481 - Land at Former Glossopdale Community College [CJO-WORKSITE.FID342596]

Hi Rachael,

Thanks for your email.

Please find attached a copy of the topographic survey, which illustrates how levels change across the site and how this has informed both the site layout and the developable area. While the Considerations Plan indicates the contours, the topo provides additional levels detail.

Regarding the loss of community facilities, it would be helpful if you could confirm which judgement you refer to so that we can review. It is also worth noting that the community facilities (the school) have of course already been 'lost' following the school's relocation and the subsequent demolition and clearance of the site, in line with the relevant permissions. We note that the policy officer has commented on loss of the community facility (and we note that the LEA has confirmed sufficient school capacity), together with comments regarding a leisure centre and sports provision. We have commented on these matters in the planning statement; however, we note that the leisure centre proposals were never brought forward, and this is considered to hold no weight in the planning process. The sports facilities have been reprovided as part of the school's relocation and no sports facilities at the application site have been accessible since the school's closure and were removed during site clearance works.

As also set out in the planning statement, the delivery of the replacement school was financed on the basis that this site would be sold for development, and we consider that any harm arising is far outweighed by the planning benefits, particularly in light of the council's recent 5YHLS update.

In terms of density and quantum of development, the application seeks consent for up to 110 dwellings. This is based on a developable area of 3 hectares (informed by site constraints and opportunities), which would equate to approximately 36 dwellings per hectare. Are you looking for an uplift on this density/quantum? I'm happy to discuss this with you and our masterplanning team, though we do need to be mindful of the site's constraints which have influenced the indicative layout and quantum (e.g. topography, trees, drainage measures, the existing culvert, and relationship with neighbouring properties).

I will need to take our client's instructions regarding the EoT so I will come back to you shortly. In the meantime, I would note that para. 39 of the NPPF encourages LPAs to take a positive and proactive approach, which is not necessarily contingent upon an EoT being in place, nevertheless, I will discuss with our client.

In the meantime, we would like to understand the LPA's current position and clarity on provision of remaining consultee comments, and the expected committee date, particularly as we consider the application provides all information necessary to enable a positive recommendation and referral to committee.

I did try calling earlier as I think it would be helpful to chat through the proposals and your thoughts on the application,

Rachael Simpkin Senior Planning Officer (Majors & Commercial)
(She/Her)
Development Services
High Peak Borough Council and Staffordshire Moorlands District Council
Mob: **07976 753719** | Connect with me on [LinkedIn](#)
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www.staffsmoorlands.gov.uk | Follow SMDC on [X \(Formerly Twitter\)](#) | [Facebook](#)

Classification L2 - Business Data

From: Richard Holliday <richard.holliday@carterjonas.co.uk>
Sent: 04 June 2025 15:12
To: Rachael Simpkin <Rachael.Simpkin@staffsmoorlands.gov.uk>
Cc: Sarah Cox <Sarah.Cox@carterjonas.co.uk>; Phoebe Gilchrist <Phoebe.Gilchrist@carterjonas.co.uk>
Subject: RE: HPK/2024/0481 - Land at Former Glossopdale Community College [CJO-WORKSITE.FID342596]

Hi Rachael,

Thanks for your email.

Please find attached a copy of the topographic survey, which illustrates how levels change across the site and how this has informed both the site layout and the developable area. While the Considerations Plan indicates the contours, the topo provides additional levels detail.

Regarding the loss of community facilities, it would be helpful if you could confirm which judgement you refer to so that we can review. It is also worth noting that the community facilities (the school) have of course already been 'lost' following the school's relocation and the subsequent demolition and clearance of the site, in line with the relevant permissions. We note that the policy officer has commented on loss of the community facility (and we note that the LEA has confirmed sufficient school capacity), together with comments regarding a leisure centre and sports provision. We have commented on these matters in the planning statement; however, we note that the leisure centre proposals were never brought forward, and this is considered to hold no weight in the planning process. The sports facilities have been reprovided as part of the school's relocation and no sports facilities at the application site have been accessible since the school's closure and were removed during site clearance works.

As also set out in the planning statement, the delivery of the replacement school was financed on the basis that this site would be sold for development, and we consider that any harm arising is far outweighed by the planning benefits, particularly in light of the council's recent 5YHLS update.

In terms of density and quantum of development, the application seeks consent for up to 110 dwellings. This is based on a developable area of 3 hectares (informed by site constraints and opportunities), which would equate to approximately 36 dwellings per hectare. Are you looking for an uplift on this density/quantum? I'm happy to discuss this with you and our masterplanning team, though we do need to be mindful of the site's constraints which have influenced the indicative layout and quantum (e.g. topography, trees, drainage measures, the existing culvert, and relationship with neighbouring properties).

I will need to take our client's instructions regarding the EoT so I will come back to you shortly. In the meantime, I would note that para. 39 of the NPPF encourages LPAs to take a positive and proactive approach, which is not necessarily contingent upon an EoT being in place, nevertheless, I will discuss with our client.

In the meantime, we would like to understand the LPA's current position and clarity on provision of remaining consultee comments, and the expected committee date, particularly as we consider the application provides all information necessary to enable a positive recommendation and referral to committee.

I did try calling earlier as I think it would be helpful to chat through the proposals and your thoughts on the application, but the number I have for you doesn't seem to connect. If you would like to call me back on 07977 914 141 it would be helpful to discuss and move things forward.

Kind regards

Richard

Richard Holliday MRTPI
Associate

T: 0113 824 2379 | M: 07977 914141 | carterjonas.co.uk
9 Bond Court, Leeds, LS1 2JZ

Classification L2 - Business Data

From: Rachael Simpkin <Rachael.Simpkin@staffs Moorlands.gov.uk>
Sent: Monday, 02 June 2025 16:56
To: Richard Holliday <richard.holliday@carterjonas.co.uk>
Cc: Sarah Cox <Sarah.Cox@carterjonas.co.uk>; Phoebe Gilchrist <Phoebe.Gilchrist@carterjonas.co.uk>
Subject: [External Message] RE: HPK/2024/0481 - Land at Former Glossopdale Community College [CJO-WORKSITE.FID342596]

Hi Richard,

Apologies, I hadn't realised you had simply repeated extracts from the Planning Statement.

We're currently exploring the principle of development and recent judgement regarding loss of community facilities.

In addition, a low density scheme appears inappropriate as a numerical rather than mix matter to be addressed at the outline stage.

Did you submit a full topographic survey with the scheme?

I note you remain silent on the EoT matter, which should be addressed to continue proactive dialogue with us.

Kind regards,

Rachael Simpkin Senior Planning Officer (Majors & Commercial)
(She/Her)
Development Services
High Peak Borough Council and Staffordshire Moorlands District Council
Mob: **07976 753719** | Connect with me on [LinkedIn](#)
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www.staffs Moorlands.gov.uk | Follow SMDC on [X \(Formerly Twitter\)](#) | [Facebook](#)

Classification L2 - Business Data

Classification L2 - Business Data

From: Richard Holliday <richard.holliday@carterjonas.co.uk>
Sent: 02 June 2025 16:18
To: Rachael Simpkin <Rachael.Simpkin@staffs Moorlands.gov.uk>; Ben Haywood <Ben.Haywood@highpeak.gov.uk>
Cc: Sarah Cox <Sarah.Cox@carterjonas.co.uk>; Phoebe Gilchrist <Phoebe.Gilchrist@carterjonas.co.uk>
Subject: RE: HPK/2024/0481 - Land at Former Glossopdale Community College [CJO-WORKSITE.FID342596]

Hi Rachael,

Thank you for your response – it's much appreciated.

Just to clarify, our policy response simply highlights the relevant sections within our planning statement where we have already provided commentary on the points raised by the council's planning policy officer, particularly regarding the leisure centre and school sports field (which we note have been read and acknowledged). The only new point is the policy team's confirmation that the council can no longer demonstrate a five-year housing land supply, which we welcome.

From our perspective, the policy officer's comments appear to defer those policy matters to your planning judgement. If you would like to discuss any of these points further, please do let me know. Otherwise, we're unclear on the need to reconsult the policy team?

It would be helpful to understand your thoughts and position on the policy considerations and proposals as a whole.

Regarding the remaining consultee comments, are you still awaiting responses from the five consultees listed in your email of 27th March, or have any now provided comments? Are you able to confirm when the outstanding consultees expect to provide their comments, please? We're happy to ask our project team to follow up with their respective consultees if that would help?

I am happy to arrange a call or Teams meeting to go through any queries you may have. However, we believe all policy matters were addressed in our original submission, and that the site sections sent on 23rd May address the levels query.

Thanks again for your reply, and we look forward to hearing from you.

Kind regards

Richard

Richard Holliday MRTPI
Associate

T: 0113 824 2379 | M: 07977 914141 | carterjonas.co.uk
9 Bond Court, Leeds, LS1 2JZ

Classification L2 - Business Data

From: Rachael Simpkin <Rachael.Simpkin@staffsmoorlands.gov.uk>

Sent: Monday, 02 June 2025 12:58

To: Richard Holliday <richard.holliday@carterjonas.co.uk>; Ben Haywood
<Ben.Haywood@highpeak.gov.uk>

Cc: Sarah Cox <Sarah.Cox@carterjonas.co.uk>; Phoebe Gilchrist <Phoebe.Gilchrist@carterjonas.co.uk>

Subject: [External Message] RE: HPK/2024/0481 - Land at Former Glossopdale Community College [CJO-WORKSITE.FID342596]

Hi Richard,

In all fairness, we have only just received your policy response, which will be forwarded to the Local Plans Team et al for commentary.

In addition, you will note that we are still missing key consultee responses, including the LLFA amongst others and therefore this scheme is simply not ready to be presented to committee.

Please will you confirm an appropriate EoT, which I suggest should be close of July 2025 at the very least.

Kind regards,

Rachael Simpkin Senior Planning Officer (Majors & Commercial)
(She/Her)
Development Services
High Peak Borough Council and Staffordshire Moorlands District Council
Mob: **07976 753719** | Connect with me on [LinkedIn](#)
www.highpeak.gov.uk | Follow HPBC on [X \(Formerly Twitter\)](#) | [Facebook](#)
www.staffsmoorlands.gov.uk | Follow SMDC on [X \(Formerly Twitter\)](#) | [Facebook](#)

Classification L2 - Business Data

Classification L2 - Business Data

From: Richard Holliday <richard.holliday@carterjonas.co.uk>
Sent: 02 June 2025 12:11
To: Rachael Simpkin <Rachael.Simpkin@staffsmoorlands.gov.uk>; Rachael Simpkin <Rachael.Simpkin@staffsmoorlands.gov.uk>; Ben Haywood <Ben.Haywood@highpeak.gov.uk>
Cc: Sarah Cox <Sarah.Cox@carterjonas.co.uk>; Phoebe Gilchrist <Phoebe.Gilchrist@carterjonas.co.uk>
Subject: RE: HPK/2024/0481 - Land at Former Glossopdale Community College [CJO-WORKSITE.FID342596]
Importance: High

Dear Rachael & Ben,

Further to our previous emails below and attached, please can you confirm that this application will be referred to the next planning committee on Monday 16th June 2025, and that the recommendation will be for approval?

We have not received an acknowledgement to our latest email (below) and the lack of meaningful updates is most concerning. We are not aware of any material planning concerns having been raised by consultees and therefore consider the application can be approved without delay in accordance with the Development Plan and NPPF.

Please can you confirm the position as soon as possible so that we may update our client and to avoid further delays in determination of the application.

Should you wish to discuss this matter please contact me on 07977 914 141.

Kind regards

Richard

Richard Holliday MRTPI
Associate

Carter Jonas

T: 0113 824 2379 | M: 07977 914141 | carterjonas.co.uk
9 Bond Court, Leeds, LS1 2JZ



Sarah Wilson

From: Richard Holliday
Sent: Friday, 23 May 2025 16:51
To: Rachael.Simpkin@highpeak.gov.uk; Rachael Simpkin
Cc: Sarah Cox; Phoebe Gilchrist
Subject: HPK/2024/0481 - Land at Former Glossopdale Community College [CJO-WORKSITE.FID342596]
Attachments: J0053214_CJ_MP_010_Illustrative Site Sections_A2@200.pdf; Response to Planning Policy Comments.pdf; Letter to LPA 19052025.pdf

Dear Rachael,

Further to our emails regarding the outline planning application for residential development of land at Talbot Road, Glossop, we attach a letter, response to policy comments, and illustrative site sections.

We would appreciate your thoughts on the attached and confirmation as to the application's progress, whether you need any further information, the expected determination/committee date and your recommendation, as set out within our attached letter.

Kind regards

Richard

Sarah Wilson

From: Richard Holliday
Sent: Thursday, 24 April 2025 17:14
To: Rachael Simpkin
Cc: Phoebe Gilchrist; Sarah Cox
Subject: RE: HPK/2024/0481 - Land at Former Glossopdale Community College Site, Talbot Road [CJO-WORKSITE.FID342596]

Dear Rachael,

I hope you're well.

I am following up on Phoebe's emails of 7th, 10th, and 17th April regarding the status of this application. We appreciate you will be busy, but we would be grateful for a response so that we can understand the current position of this application.

With the planning committee date and associated report deadline fast approaching, we want to ensure everything is in order for the application to be referred to committee with a recommendation to approve.

That being the case, and in the interests of maintaining proactive negotiations, we would appreciate confirmation of your views of the proposals, whether the outstanding consultee comments have been received (and, if so, please can we have sight of these), and whether there is any outstanding information required from us to enable a recommendation to approve?

Given the time-sensitive nature of the process, a prompt response would be appreciated so we can ensure everything is in place ahead of the deadline, which we assume is two weeks prior to the committee date.

We look forward to your response.

Kind regards

Richard

From: Phoebe Gilchrist <Phoebe.Gilchrist@carterjonas.co.uk>
Sent: Thursday, 17 April 2025 12:19
To: Rachael Simpkin <Rachael.Simpkin@staffs Moorlands.gov.uk>
Cc: Richard Holliday <richard.holliday@carterjonas.co.uk>; Sarah Cox <Sarah.Cox@carterjonas.co.uk>
Subject: RE: HPK/2024/0481 - Land at Former Glossopdale Community College Site, Talbot Road

Good afternoon Rachael,

I hope you're well.

Further to the email below, I wanted to follow up and ask if you could provide an update on the outstanding queries at your earliest convenience.

Kind regards

Phoebe

Phoebe Gilchrist MRTPI
Senior Planner

T: 0113 531 5067 | M: 07799 340976
9 Bond Court, Leeds, LS1 2JZ

Sarah Wilson

From: Phoebe Gilchrist
Sent: Thursday, 17 April 2025 12:19
To: Rachael Simpkin
Cc: Richard Holliday; Sarah Cox
Subject: RE: HPK/2024/0481 - Land at Former Glossopdale Community College Site, Talbot Road

Good afternoon Rachael,

I hope you're well.

Further to the email below, I wanted to follow up and ask if you could provide an update on the outstanding queries at your earliest convenience.

Kind regards

Phoebe

Phoebe Gilchrist MRTPI
Senior Planner

T: 0113 531 5067 | M: 07799 340976
9 Bond Court, Leeds, LS1 2JZ

Classification L2 - Business Data

From: Phoebe Gilchrist
Sent: Thursday, 10 April 2025 16:33
To: Rachael Simpkin <Rachael.Simpkin@staffs Moorlands.gov.uk>
Cc: Richard Holliday <Richard.Holliday@carterjonas.co.uk>; Sarah Cox <Sarah.Cox@carterjonas.co.uk>
Subject: RE: HPK/2024/0481 - Land at Former Glossopdale Community College Site, Talbot Road

Hi Rachael,

I hope you are well.

Further to the below, please can you confirm as soon as possible where you would like the indicative site sections to be taken through the site? We would suggest that we can provide indicative sections through the site east to west (from North Road to Fauvel Road).

The client is keen to aim for the May committee and we would therefore like to instruct our architect to complete these site sections imminently as to not delay the process.

Please can you confirm that there are no other matters that you require information and are otherwise happy recommending approval?

Kind regards

Phoebe

From: Phoebe Gilchrist
Sent: Monday, 07 April 2025 09:40
To: Rachael Simpkin <Rachael.Simpkin@staffs Moorlands.gov.uk>
Cc: Richard Holliday <Richard.Holliday@carterjonas.co.uk>; Sarah Cox <Sarah.Cox@carterjonas.co.uk>
Subject: RE: HPK/2024/0481 - Land at Former Glossopdale Community College Site, Talbot Road

Good morning Rachael,

Thank you for confirming the committee date. I noticed that the website states the committee meeting starts at 1:30 PM - could you kindly confirm if this is correct so that we can make the necessary arrangements to attend?

Please can you advise where you would like the indicative site sections to be taken through the site?

Please could you also confirm your position and thoughts on the scheme, and if you require any further information to enable you to recommend approval. We note that the Policy Officer has commented on various matters, and it would be helpful to understand your thoughts on this please.

Has there been any further consultee comments on the scheme, noting the five consultees you previously highlighted as remaining outstanding?

We can confirm our agreement to the extension of time to 30th May 2025, as requested.

Kind regards

Phoebe

From: Rachael Simpkin <Rachael.Simpkin@staffs Moorlands.gov.uk>
Sent: Tuesday, 01 April 2025 15:33
To: Phoebe Gilchrist <Phoebe.Gilchrist@carterjonas.co.uk>
Cc: Richard Holliday <richard.holliday@carterjonas.co.uk>; Sarah Cox <Sarah.Cox@carterjonas.co.uk>
Subject: [Ext Msg] RE: HPK/2024/0481 - Land at Former Glossopdale Community College Site, Talbot Road

Hi Phoebe,

Apologies, the committee meeting is on the 19th May.

Please note an EoT should be received by return to continue proactive negotiation. Should this not be received then I will contact the applicant.

Kind regards,

Rachael Simpkin Senior Planning Officer (Majors & Commercial)
(She/Her)
Development Services
High Peak Borough Council and Staffordshire Moorlands District Council
Mob: **07976 753719** | Connect with me on [LinkedIn](#)
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www.staffs Moorlands.gov.uk | Follow SMDC on [X \(Formerly Twitter\)](#) | [Facebook](#)

Classification L2 - Business Data

From: Phoebe Gilchrist <Phoebe.Gilchrist@carterjonas.co.uk>
Sent: 01 April 2025 15:19
To: Rachael Simpkin <Rachael.Simpkin@staffs Moorlands.gov.uk>
Cc: Richard Holliday <richard.holliday@carterjonas.co.uk>; Sarah Cox <Sarah.Cox@carterjonas.co.uk>
Subject: RE: HPK/2024/0481 - Land at Former Glossopdale Community College Site, Talbot Road

Good afternoon Rachael,

Thank you for the update and for sending across the Local Plan comments. We will review them and be in touch in due course regarding the additional information.

Regarding the May committee date, we note that Planning Committees are usually held on a Monday. Could you please confirm whether the committee date is Monday 19th or Tuesday 20th?

Kind regards

Phoebe

Phoebe Gilchrist MRTPI
Senior Planner

T: 0113 531 5067 | M: 07799 340976 | carterjonas.co.uk
9 Bond Court, Leeds, LS1 2JZ

Classification L2 - Business Data

From: Rachael Simpkin <Rachael.Simpkin@staffs Moorlands.gov.uk>
Sent: Thursday, 27 March 2025 16:40
To: Phoebe Gilchrist <Phoebe.Gilchrist@carterjonas.co.uk>
Cc: Richard Holliday <richard.holliday@carterjonas.co.uk>; Sarah Cox <Sarah.Cox@carterjonas.co.uk>
Subject: [Ext Msg] RE: HPK/2024/0481 - Land at Former Glossopdale Community College Site, Talbot Road

Hi Phoebe,

Apologies I have not managed to catch up with you earlier.

You will appreciate there are still key consultees to be received before we can progress the scheme, including:

- County Flood Authority (LLFA)
- POS (including contributions)
- Arb Officer
- Conservation Officer
- County Archaeology

I have also attached Local Plan comments which do not appear on the public file.

We are also seeking some proposed levels information, including sections at this stage.

You may be aware of the County Elections and entering a period of pre-election purdah, which means the scheme, if ready, cannot be determined at the April committee.

Accordingly, I propose we agree to an EoT to the 30th May to take into account the 20th May DC Committee meeting.

Kind regards,

Rachael Simpkin Senior Planning Officer (Majors & Commercial)
(She/Her)
Development Services
High Peak Borough Council and Staffordshire Moorlands District Council
Mob: **07976 753719** | Connect with me on [LinkedIn](#)
www.highpeak.gov.uk | Follow HPBC on [X \(Formerly Twitter\)](#) | [Facebook](#)
www.staffs Moorlands.gov.uk | Follow SMDC on [X \(Formerly Twitter\)](#) | [Facebook](#)

From: Phoebe Gilchrist <Phoebe.Gilchrist@carterjonas.co.uk>
Sent: 26 March 2025 13:46
To: Rachael Simpkin <Rachael.Simpkin@staffsmoorlands.gov.uk>
Cc: Richard Holliday <richard.holliday@carterjonas.co.uk>; Sarah Cox <Sarah.Cox@carterjonas.co.uk>
Subject: RE: HPK/2024/0481 - Land at Former Glossopdale Community College Site, Talbot Road

Dear Rachael,

I hope you are well.

Further to the emails below, we would appreciate an update, particularly with regard to the expected committee date, which we have noticed has now been revised to the 28th April on Public Access.

Additionally, we note that none of the consultees have raised objections thus far. Are you still awaiting any further responses from consultees?

We would also be interested in hearing your thoughts on the application.

We look forward to hearing from you.

Kind regards

Phoebe

Phoebe Gilchrist MRTPI
Senior Planner

T: 0113 531 5067 | M: 07799 340976 | carterjonas.co.uk
9 Bond Court, Leeds, LS1 2JZ

From: Phoebe Gilchrist
Sent: Tuesday, 11 March 2025 15:22
To: Rachael Simpkin <Rachael.Simpkin@staffsmoorlands.gov.uk>
Cc: Richard Holliday <Richard.Holliday@carterjonas.co.uk>
Subject: RE: HPK/2024/0481 - Land at Former Glossopdale Community College Site, Talbot Road

Good afternoon Rachael,

I hope you are well.

Further to my colleague's email below, would you mind sharing your thoughts on the proposal and how the site visit went? It would also be very helpful to understand the status of outstanding consultee comments, particularly which ones are still pending, as well as the anticipated timescales for these.

Do you have any concerns, or would you be happy to recommend approval?

Additionally, could you confirm whether the committee meeting on Monday 24th March, remains a realistic target?

Please feel free to contact me or Richard if you have any questions or need further information.

Kind regards

Sarah Wilson

From: Richard Holliday
Sent: Wednesday, 26 February 2025 21:17
To: Rachael Simpkin
Cc: Phoebe Gilchrist
Subject: RE: HPK/2024/0481 - Land at Former Glossopdale Community College Site, Talbot Road [CJO-WORKSITE.FID342596]

Hi Rachael,

I hope you're well.

Thank you for your email update below.

I wanted to check if your site visit went well and if you have managed to review the submission yet? If you have any queries please let us know, and it would be helpful to understand your thoughts on the proposals at this stage please.

Many thanks

Richard

From: Rachael Simpkin <Rachael.Simpkin@staffsmoorlands.gov.uk>
Sent: Monday, 17 February 2025 16:58
To: Richard Holliday <richard.holliday@carterjonas.co.uk>
Cc: Phoebe Gilchrist <Phoebe.Gilchrist@carterjonas.co.uk>
Subject: [External Message] RE: HPK/2024/0481 - Land at Former Glossopdale Community College Site, Talbot Road [CJO-WORKSITE.FID342596]

Hi Richard,

I'm aiming to visit site in the next week.

At this stage I cannot confirm if the scheme will be ready for the March committee.

Kind regards,

Rachael Simpkin Senior Planning Officer (Majors & Commercial)
(She/Her)
Development Services
High Peak Borough Council and Staffordshire Moorlands District Council
Mob: **07976 753719** | Connect with me on [LinkedIn](#)
www.highpeak.gov.uk | Follow HPBC on [X \(Formerly Twitter\)](#) | [Facebook](#)
www.staffsmoorlands.gov.uk | Follow SMDC on [X \(Formerly Twitter\)](#) | [Facebook](#)

Classification L2 - Business Data

From: Richard Holliday <richard.holliday@carterjonas.co.uk>
Sent: 17 February 2025 16:40
To: Rachael Simpkin <Rachael.Simpkin@staffsmoorlands.gov.uk>; Rachael Simpkin <Rachael.Simpkin@staffsmoorlands.gov.uk>
Cc: Phoebe Gilchrist <Phoebe.Gilchrist@carterjonas.co.uk>

Subject: FW: HPK/2024/0481 - Land at Former Glossopdale Community College Site, Talbot Road [CJO-WORKSITE.FID342596]

Dear Rachael,

I wanted to follow-up on my previous email, as I understand you may have a different email address to the below.

As mentioned, it would be helpful to have an initial discussion to go over any initial thoughts or queries you may have.

We also note that the planning portal indicates the decision will be made by planning committee, with a scheduled committee date of 24th March 2025. Please could you advise if this date is confirmed so that we can block out the appropriate time in our diaries or if this is a placeholder and likely to change?

Many thanks

Richard

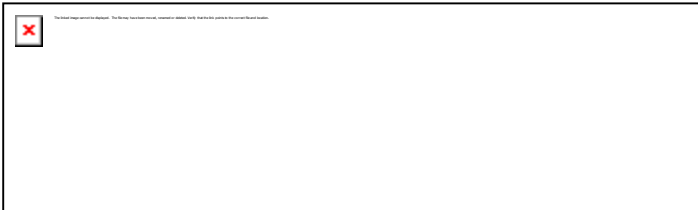
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9 Bond Court, Leeds, LS1 2JZ



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Classification L2 - Business Data

From: Richard Holliday

Sent: Thursday, 06 February 2025 08:28

To: Rachael.Simpkin@highpeak.gov.uk

Cc: Phoebe Gilchrist <Phoebe.Gilchrist@carterjonas.co.uk>

Subject: HPK/2024/0481 - Land at Former Glossopdale Community College Site, Talbot Road [CJO-WORKSITE.FID342596]

Dear Rachael,

I hope you are well.

I wanted to get in touch regarding the outline planning application we submitted recently on behalf of our client, Derbyshire County Council, in relation to a proposed residential development of land at Talbot Road (the site of the former Glossopdale Community College).

I appreciate we are still relatively early in the determination period, but it would be helpful to check-in and discuss any initial thoughts.

If you have any queries please do let us know and we would be happy to discuss.

Many thanks

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Place of Registration: England and Wales
Registration Number: OC304417
Address of Registered Office: One Chapel Place, London, W1G 0BG.

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8. Economics Benefit Statement

ECONOMIC BENEFITS STATEMENT

Proposed Residential Development, Glossop, High Peak

Derbyshire County Council
July 2026

Carter Jonas

Date: July 2026

Client: Derbyshire County Council

Job Number: J0097252

Contact: Sarah Cox

The conclusions in this report reflect Carter Jonas LLP's professional opinion at the time of writing, based on the scope and information available then. It does not account for any changes that may have occurred since.

You should be aware that the report is specific to the project and purpose for which we were engaged. It should not be used for other projects or variations, and any such use is at the user's own risk.

Information provided by the Client and third parties has been assumed accurate. While reasonable care was taken, Carter Jonas LLP accepts no liability for any errors or omissions resulting from incorrect data.

We would remind you that the report is intended for the Client's use under the agreed terms. If shared with authorities or third parties, we accept no liability for any reliance placed on it by others.

Project Ref:	J0097252	J0097252
Status:	Draft	Final
Issue/Rev:	01	01
Date:	17.07.2026	20.07.2026
Prepared by:	PG/SC	PG/SC
Checked by:	SC	SC

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1. INTRODUCTION

- 1.1 This Economic Benefits Statement has been prepared in support of the proposed residential development at Glossop, Derbyshire. The purpose of the statement is to assess the economic benefits arising from the development and demonstrate how the proposal would support local and national planning objectives relating to housing delivery, economic growth, investment and employment creation.
- 1.2 The economic contribution of housing delivery extends significantly beyond the provision of new homes. The Home Builders Federation (HBF)¹ reports that the delivery of 26,870 homes in the North West during 2023/24 supported almost £6 billion in local economic activity and approximately 93,000 jobs. The report further identifies that residential development generates substantial expenditure within local economies, infrastructure investment and support for local businesses, demonstrating the important relationship between housing growth and economic prosperity. (A copy of the Home Builders Federation report, 2025 is provided as Appendix A).
- 1.3 Independent research undertaken by the Centre for Economics and Business Research (Cebr)² and published in 2024 concludes that housebuilding generates substantial economic benefits through direct construction activity, supply-chain expenditure and induced spending effects. The study found that investment in housing supports economic growth, employment creation and wider productivity gains, with benefits extending well beyond the construction period itself. (A copy of this report is provided in Appendix B).
- 1.4 The proposed development will deliver new residential development within a sustainable location in Glossop, together with associated infrastructure, landscaping, public open space, biodiversity enhancements and sustainable drainage measures. The scheme has been developed through a landscape-led approach that seeks to respond positively to its surroundings, integrate with the existing settlement pattern and provide a high-quality living environment for future residents. The proposals will also improve connections to surrounding services, facilities and green infrastructure, supporting sustainable patterns of movement and development.
- 1.5 Glossop is recognised as one of the principal settlements within High Peak Borough and performs an important role within the local economy. The town benefits from strong transport links to Greater Manchester and other regional centres, a well-established town centre, a diverse employment base and access to a wide range of educational, healthcare, recreational and community facilities. As one of the Borough's most sustainable settlements, Glossop is particularly well placed to accommodate growth that supports both local housing needs and wider economic objectives.
- 1.6 High Peak Borough Council has identified both housing delivery and economic growth as strategic priorities. The Council's Growth Strategy 2025–2028 (provided as Appendix C of this report) confirms that the Borough faces challenges in respect of housing delivery, including an increased housing requirement and a substantial shortfall in five-year housing land supply. The Strategy also identifies the need to support economic growth, attract and retain working-age households, strengthen town centres and create the conditions necessary for sustainable long-term prosperity³.

¹ HBF, Building communities in the North West: Exploring the economic contributions of home building in the North West, New homes Week 2025, page 4

² Cebr, The economic impact of building social housing, February 2024, page 49

³ High Peak Borough Council, Growth Strategy 2025-2028, page 21-23

- 1.7 The proposed development would contribute directly towards these objectives by increasing the supply of housing within a sustainable and accessible location whilst supporting the retention and attraction of economically active households. The provision of additional homes will assist in addressing identified housing needs, support labour mobility, increase consumer spending and help maintain the population base required to sustain local services, facilities and businesses. The development will also contribute towards the creation of balanced and sustainable communities capable of supporting future economic growth.
- 1.8 The economic benefits associated with the proposal will arise throughout both the construction and operational phases of the development. During construction, the scheme will generate employment opportunities, support local contractors and supply chains and facilitate significant private-sector investment. Once occupied, future residents will contribute expenditure to the local economy, supporting local businesses, services and facilities, whilst generating additional revenues for public authorities and helping to sustain the vitality and viability of Glossop town centre.
- 1.9 The development will therefore deliver a wide range of economic, social and environmental benefits that extend beyond the provision of housing. By supporting housing delivery, economic investment, employment generation, environmental enhancement and community sustainability, the proposal represents a significant opportunity to contribute positively towards the strategic objectives of High Peak Borough Council and the long-term prosperity of Glossop and the wider Borough.

2. STRATEGIC CONTEXT

- 2.1 High Peak Borough Council's Growth Strategy 2025-2028 identifies housing and employment growth as essential to maintaining sustainable communities across the Borough⁴. The Strategy confirms that the delivery of both housing and employment development has fallen below the targets established within the adopted Local Plan and acknowledges that the position has been worsened by revisions to the National Planning Policy Framework published in December 2024. The Council confirms that the Borough's housing requirement has increased from 350 dwellings per annum to 553 dwellings per annum, an increase of almost 58%, and current evidence shows the Council can currently demonstrate only a 2.85-year housing land supply against the required five-year supply.
- 2.2 The Growth Strategy further recognises that the emerging Local Plan will be required to address both the increased housing requirement and the historical under-delivery of housing and employment development. The Council therefore recognises the need to accelerate delivery and increase economic growth across the Borough.
- 2.3 The proposed development directly responds to these identified challenges by significantly contributing to housing delivery within one of the Borough's principal settlements and assisting the Council in achieving its strategic growth objectives.

Sustainable Location

- 2.4 The site occupies a highly sustainable location within the urban area of Glossop, benefiting from access to local shops, schools, healthcare facilities, bus services and Glossop railway station. This accessibility will enable residents to access employment, services and facilities without reliance on private vehicles, supporting sustainable patterns of development.

⁴ High Peak Borough Council, Growth Strategy 2025-2028, page 22-23

3. CONSTRUCTION PHASE ECONOMIC BENEFITS

Construction Employment

- 3.1 Based on HBF and Cebr evidence, the development is expected to support substantial direct, indirect and induced employment during the construction phase.
- 3.2 Employment opportunities would be created across a wide range of occupations including:
- Site management
 - Civil engineering
 - Groundworks
 - Bricklaying
 - Carpentry and joinery
 - Roofing
 - Plumbing and heating installation
 - Electrical works
 - Landscaping and environmental works
 - Transport and logistics
- 3.3 The construction sector generates extensive multiplier effects, supporting employment not only on-site but also throughout the wider supply chain. Local businesses involved in manufacturing, distribution, plant hire, professional consultancy and materials supply would benefit from development expenditure.
- 3.4 These economic benefits would commence immediately following implementation and continue throughout the construction programme.

Investment in Local Businesses

- 3.5 The development will require substantial expenditure on:
- Construction materials
 - Specialist subcontractors
 - Utilities infrastructure
 - Professional consultancy services
 - Environmental work
 - Plant and equipment hire
 - Building products and logistics support

- 3.6 This investment will support businesses operating within Glossop, High Peak, Derbyshire and Greater Manchester, creating additional demand and increasing economic activity throughout the local supply chain.
- 3.7 Such expenditure directly supports High Peak Borough Council's objective of increasing economic growth and supporting local enterprise.

4. LOCAL ECONOMY AND EMPLOYMENT BENEFITS

Supporting the Local Workforce

- 4.1 The Growth Strategy identifies High Peak as a highly economically active area, with 83.5% of the working-age population participating in the labour market, exceeding the national average of 78.5%. The Strategy also recognises that a significant proportion of residents commute to employment centres including Greater Manchester, highlighting the importance of maintaining an appropriate supply of housing to support labour mobility and workforce retention⁵.
- 4.2 The proposed development would assist in:
- Retaining economically active households within the Borough
 - Supporting local labour supply
 - Providing housing opportunities for key workers
 - Improving access to employment opportunities
 - Supporting business recruitment and workforce retention
 - Meeting the needs of younger households seeking to remain within the local area
- 4.3 The Council's Growth Strategy specifically identifies the opportunity to attract and retain skilled workers, entrepreneurs and hybrid workers by promoting High Peak's quality of life, housing offer and strategic location⁶. The delivery of additional housing in Glossop would directly support this objective.
- 4.4 Cebr's research (Appendix B) highlights the relationship between housing provision, labour market participation and economic productivity. The report concludes that access to stable and affordable housing supports workforce retention, enables labour mobility and improves employment outcomes, generating long-term economic benefits for local economies and public finances⁷.
- 4.5 The HBF Housing Calculator⁸ indicates that 100 additional residential dwellings in the High Peak Borough area would result in:
- 112 direct jobs
 - 60 indirect jobs

Supporting Economic Growth

- 4.6 High Peak Borough Council acknowledges that housing delivery has fallen below target and that growth in the local economy has lagged behind national trends. The Council identifies an urgent need to facilitate additional residential and employment development to support sustainable economic growth and increase the resilience of local communities.

⁵ High Peak Borough Council, Growth Strategy 2025-2028, pg 36

⁶ High Peak Borough Council, Growth Strategy 2025-2028, pg 21

⁷ Cebr, The economic impact of building social housing, February 2024, pg 8

⁸ HBF Housing Calculator. Found at: [HBF Housing Calculator](#)

4.7 The proposed development would contribute positively towards:

- Meeting housing requirements
- Supporting labour market growth
- Increasing consumer expenditure
- Supporting local businesses
- Enhancing economic competitiveness
- Encouraging population growth and retention

4.8 The HBF Housing Calculator⁹ indicates that 100 additional residential dwellings in the High Peak Borough area would result in:

- £2,833,333 spending in local shops

⁹ HBF Housing Calculator. Found at: [HBF Housing Calculator](#)

5. HOUSING DELIVERY BENEFITS

Meeting Identified Housing Needs

- 5.1 The provision of new housing represents a substantial planning and economic benefit.
- 5.2 The Council's Growth Strategy identifies that the Borough's population has remained largely static over the last decade, with the 2021 Census recording a resident population of 91,104. At the same time, the population has continued to age, with residents aged 65 and over increasing by 27% since 2011. The Strategy identifies the need to deliver new housing in order to support sustainable communities, retain younger households and reverse long-term demographic decline.
- 5.3 The Growth Strategy also highlights housing affordability challenges within the Borough. High Peak has one of the highest house-price-to-earnings ratios in Derbyshire at 7.4, demonstrating the need for additional housing supply and greater housing choice.
- 5.4 Against this background, the proposed development would make a direct contribution towards:
- Increasing housing supply
 - Broadening housing choice
 - Supporting younger households and families
 - Addressing affordability pressure
 - Contributing towards the Council's housing delivery ambitions

Supporting Sustainable Population Growth

- 5.5 The proposals include affordable housing provision in accordance with planning policy requirements, helping to address identified affordability pressures within High Peak and broaden housing choice.

6. LONG-TERM ECONOMIC BENEFITS

Household Expenditure and Local Spending

- 6.1 Following occupation, future residents will contribute significant expenditure to the local economy.
- 6.2 Additional spending is likely to occur across:
- Convenience retail
 - Comparison retail
 - Food and beverage establishments
 - Leisure and recreation facilities
 - Healthcare services
 - Personal and professional services
 - Local trades and contractors
- 6.3 Glossop contains a well-established town centre, independent retailers, cafés, restaurants, markets and community facilities which rely upon a sustainable customer base. Increased population growth will help maintain spending levels, improve business confidence and support long-term investment.

Supporting Glossop Town Centre

- 6.4 The Council's Growth Strategy identifies town centre regeneration as one of its key growth missions and highlights the importance of supporting the vitality and viability of Glossop town centre. The Strategy references the Council-led regeneration of Glossop Halls, which will create new business opportunities, food and drink uses, leisure facilities, community spaces and opportunities for entrepreneurs and creative industries.
- 6.5 The proposed development would complement this investment by increasing local expenditure, supporting footfall, strengthening demand for local services and helping sustain town centre businesses. Additional population growth within Glossop would contribute to the economic resilience of the town centre and support the Council's broader regeneration objectives.
- 6.6 The development would therefore contribute towards:
- Improved town centre vitality
 - Increased consumer expenditure
 - Enhanced business confidence
 - Support for existing businesses and jobs
 - Greater long-term economic resilience

Alignment with the Council's Growth Strategy

- 6.7 The proposed development would make a significant and direct contribution towards the strategic objectives set out within the High Peak Growth Strategy 2025–2028, adopted by High Peak Borough Council. The Growth Strategy recognises that the Borough faces substantial challenges relating to

housing delivery, demographic change, economic growth and town centre vitality, and identifies a series of strategic missions intended to support sustainable growth and long-term prosperity.

- 6.8 The Strategy acknowledges that High Peak is currently experiencing a significant housing land supply shortfall and that housing delivery has fallen below identified requirements. It further recognises the need to increase the supply of homes, attract and retain economically active households, support local businesses, strengthen town centres and create sustainable communities capable of supporting future economic growth.
- 6.9 In this context, the proposed development would directly support a number of the Council's key growth missions. In particular, the proposal would support:

Mission 1 – Accelerate Housing Delivery

- 6.10 The development would contribute to increasing the supply of housing within one of the Borough's most sustainable settlements. By bringing forward a deliverable residential scheme, the proposal would assist the Council in addressing identified housing needs, improving housing choice and increasing the rate of housing delivery across the Borough. The scheme would therefore support the Council's objective of accelerating housing provision and addressing the current housing land supply shortfall. Furthermore, the proposal represents a deliverable opportunity capable of making a meaningful contribution to housing supply within a relatively short timeframe. As identified within the accompanying Development Appraisal Statement, schemes of this nature can typically progress from planning through to completion within approximately four to six years, with the construction phase delivering new homes over a period of around two to two-and-a-half years.
- 6.11 In the context of the Borough's substantial housing land supply shortfall and increased housing requirement, the proposal would provide a readily deliverable source of new housing capable of contributing towards identified needs in the short to medium term. The ability to deliver homes within a defined and realistic programme is a material benefit of the scheme and aligns closely with the Council's objective of accelerating housing delivery, increasing housing supply and ensuring that sustainable sites are brought forward to support the Borough's growth ambitions.

Mission 5 – Further Regenerate Towns

- 6.12 The Growth Strategy identifies the importance of enhancing the vitality and viability of High Peak's town centres, including Glossop. The proposed development would support this objective by increasing the resident population within the town, generating additional expenditure within local shops, services, cafés, restaurants and leisure facilities. This additional spending power would help support existing businesses, encourage investment and contribute to the long-term economic resilience of Glossop town centre.

Mission 6 – Support Business and the Development of Skills

- 6.13 The development would deliver significant economic benefits during the construction phase through the creation of employment opportunities and demand for local contractors, suppliers and professional services. In the longer term, the provision of additional housing would help support labour mobility, workforce retention and business recruitment by providing homes for economically active households within a sustainable and accessible location. The proposal would therefore contribute towards the Council's objective of supporting local businesses, strengthening the labour market and fostering sustainable economic growth.

- 6.14 More broadly, the scheme aligns with the overarching ambition of the Growth Strategy to create sustainable communities that support economic prosperity, investment and population growth. By delivering new housing, supporting local expenditure, generating employment opportunities and contributing towards infrastructure investment, the proposal would assist in achieving the Council's wider objectives for growth and regeneration across the Borough. As such, substantial weight should be afforded to the scheme's contribution towards the delivery of the Council's adopted strategic priorities.
- 6.15 Evidence published by the Home Builders Federation demonstrates that new housing generates significant spending within local economies through expenditure on retail, leisure, hospitality and services. Across England and Wales, homes delivered in a single year were estimated to generate approximately £6.4 billion of spending in local shops and services, underlining the important role that housing growth plays in supporting local businesses and town centres (Appendix A).

7. FISCAL BENEFITS

Council Tax Revenue

- 7.1 In addition to the direct and indirect economic benefits associated with construction activity and future resident expenditure, the proposed development would generate important fiscal benefits for High Peak Borough Council and other public authorities through the creation of additional Council Tax revenues. Once occupied, the development would provide a long-term and recurring source of revenue that would contribute towards the funding and maintenance of local services, infrastructure and community facilities.
- 7.2 The significance of this benefit should not be underestimated. The delivery of new housing not only increases the Borough's housing stock but also enhances the financial resources available to local authorities to support the needs of existing and future communities. Additional Council Tax receipts help strengthen the financial resilience of public authorities and provide an ongoing contribution towards the delivery of a wide range of essential local services.
- 7.3 Revenue generated by the development would assist in funding:
- Local authority services
 - Community facilities and public services
 - Environmental management and maintenance
 - Public realm improvements
 - Waste collection and other neighbourhood services
 - Parks, open spaces and recreation facilities
 - Highway and infrastructure maintenance
 - Wider investment supporting sustainable communities
- 7.4 The generation of additional Council Tax revenue therefore represents a lasting public benefit arising from the development, helping to ensure that future population growth contributes positively towards the long-term sustainability and vitality of the Borough.
- 7.5 Research undertaken by Cebr (Appendix B) identifies wider fiscal benefits associated with new housing delivery, including increased tax revenues, reduced welfare expenditure, lower homelessness-related costs and savings to public services. The report estimates that the long-term economic and social benefits arising from housing investment significantly exceed the initial costs of delivery, resulting in substantial net benefits for government and wider society.

Planning Obligations and Infrastructure Contributions

- 7.6 The proposed development also has the potential to deliver wider public benefits through planning obligations and developer contributions secured through the planning process. Such measures play an important role in ensuring that new development is supported by appropriate infrastructure and community investment, whilst mitigating potential impacts and enhancing the quality and sustainability of future growth.

- 7.7 Developer contributions can assist local authorities and service providers in accommodating additional population growth by supporting the provision, enhancement or maintenance of infrastructure and facilities required to serve both new and existing residents. The delivery of these benefits reflects the fundamental planning principle that sustainable development should be supported by the infrastructure necessary to meet the needs arising from growth.
- 7.8 Subject to the nature and scale of the development, infrastructure contributions may support investment in:
- Education provision and school capacity improvements
 - Highway and junction improvements
 - Public transport infrastructure and sustainable travel measures
 - Pedestrian and cycling infrastructure
 - Public open space, recreation and green infrastructure
 - Community facilities and local services
 - Environmental enhancement measures
 - Health, wellbeing and community infrastructure where appropriate
- 7.9 These investments would assist in ensuring that development is accompanied by improvements to local infrastructure and services, thereby supporting the creation of sustainable and well-connected communities. Such contributions also provide an opportunity to secure wider benefits for existing residents, helping to improve local facilities and infrastructure alongside the delivery of new housing.
- 7.10 Furthermore, the proposal's commitment to the provision of public open space, landscaping, biodiversity enhancements, sustainable drainage infrastructure and improved connectivity demonstrates that the benefits of the development extend beyond conventional financial contributions. Collectively, these measures represent a significant investment in place-making, environmental quality and community wellbeing, contributing towards the creation of a high-quality and sustainable residential environment.
- 7.11 The wider community benefits associated with residential development are substantial. According to the Home Builders Federation¹⁰, housing delivery in the North West during 2023/24 generated approximately £168 million towards infrastructure provision, including more than £75 million for new and improved schools, as well as significant investment in open space and community facilities (Appendix A). These contributions help ensure that growth is accompanied by corresponding improvements in local infrastructure and services.
- 7.12 Taken together, the additional Council Tax revenues and infrastructure contributions generated by the development would deliver important long-term fiscal benefits, supporting public services, infrastructure provision and community facilities throughout the Borough. These benefits should be afforded substantial weight in the overall planning balance, reflecting the positive contribution that the development would make towards the delivery of sustainable growth and the strategic objectives of High Peak Borough Council.

¹⁰ HBF, Building communities in the North West: Exploring the economic contributions of home building in the North West, New Homes Week 2025, page 4

8. CONCLUSION

- 8.1 The proposed development represents a significant opportunity to deliver sustainable growth within Glossop and make a positive contribution towards the strategic objectives of High Peak Borough Council.
- 8.2 The Council's Growth Strategy confirms that housing delivery is significantly below the required level, that the Borough faces a housing land supply shortfall, and that growth is required to support sustainable communities, economic prosperity and long-term financial sustainability. The Strategy also identifies the need to reverse demographic stagnation, support town centre regeneration and increase economic activity across the Borough.
- 8.3 The proposed development would contribute directly to these objectives through the delivery of new housing, construction employment, support for local businesses, increased household expenditure, additional Council Tax revenues and enhanced support for Glossop town centre.
- 8.4 Importantly, the proposal aligns closely with the objectives of the High Peak Growth Strategy 2025–2028 by supporting housing delivery, economic growth, town centre vitality and sustainable communities. Taken together, the benefits of the development are substantial and should be afforded significant weight in the planning balance.

APPENDICES

- A. Home Builders Federation, Building communities in the North West: Exploring the economic contributions of home building in the North West, New Homes Week 2025**

Building communities in the North West

Exploring the economic contributions of
home building in the North West

Introduction

The home building industry has faced a difficult few years. While much progress was made to increase the housing supply through the latter half of the 2010s, the 2020s have seen a mix of economic, legislative, and political challenges, all of which sought to restrict development, and housing supply has suffered as a result.

Since the General Election in summer 2024, housing has been centred in the political debate following the new Government's pledge to build 1.5 million homes over the course of the Parliament, and the first six months have seen a host of changes to the home building process announced. The new National Planning Policy Framework (NPPF) has been the most significant change, and the reintroduction of mandatory housing targets for local authorities has been welcomed by the industry.

The Government's housing targets are ambitious, and there are still numerous obstacles and barriers that will need to be overcome if they are to be achieved.

Alongside the planning reforms, there needs to be action taken to address the other blocks on housing supply. There are still 160,000 homes held up due to nutrient neutrality. There is also a need to address the lack of affordable mortgage availability in the market, as this is suppressing demand and will, in turn, hamper the supply side of the equation too. Elsewhere, home builders are facing difficulties in securing bids for homes delivered through S106 contributions, threatening the future provision of much-needed affordable housing.

Communities

Increasing the supply of new homes is critical not only to tackling the housing crisis, but also for supporting and creating thriving local communities, and home builders are committed to working with Local Authorities to ensure this. With each new home delivered, builders make Section 106 contributions to the local council as part of securing planning permission, to benefit new and existing residents. From building schools and hospitals to creating parks, green spaces, and leisure facilities, our members are integral to the growth and investment of communities up and down the country.

The significant contribution that home builders make is rarely understood by local communities, leading to local opposition to new homes on the basis of the perception that the existing local infrastructure would struggle cope with an increase in population. If the economic and social benefits that new homes bring were being fully realised by local communities, new homes could be brought forward more quickly, alleviating our housing crisis and helping more people achieve their dream of homeownership.

As output begins to pick up again, community will remain at the core of development and the Government's plans could see billions of pounds worth of additional investment in our infrastructure and communities.

National figures

The home building industry is a major investor in communities across the country.

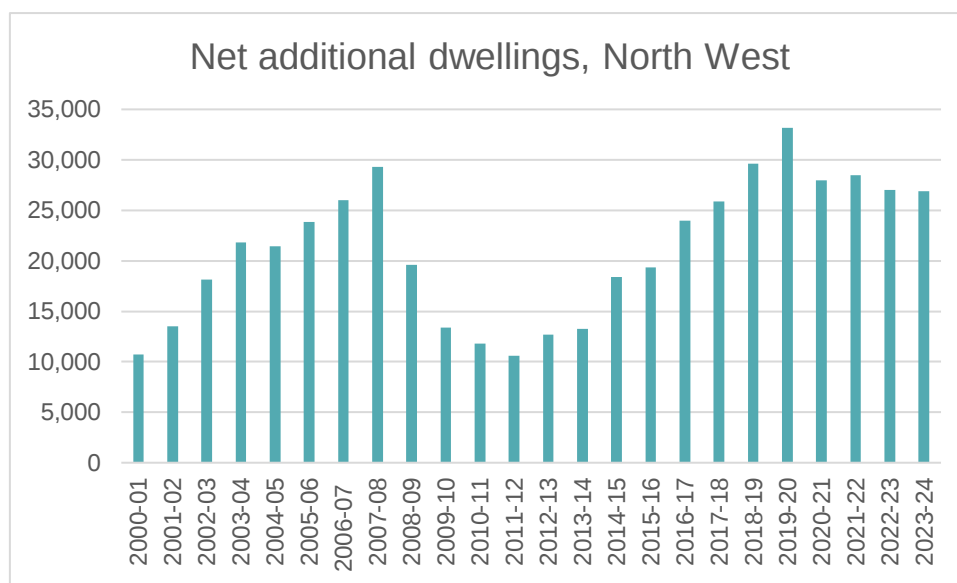
Across England and Wales, 226,000 homes were delivered last year bringing billions of pounds of investment, including:

- Over £10 billion for affordable housing
 - Affordable housing not only promotes integration within communities, it also has a significant impact on productivity and economic growth.

- Home builders work closely with local authorities to ensure the affordable housing provision is sufficiently designed to meet local needs.
- Homes are also deliberately designed to ensure they are well integrated with the neighbouring market housing and indistinguishable in design terms.
- In 2022-23, 63,605 affordable homes were delivered in England, 47% of which were through S106 contributions.
- £6.4 billion in spending in local shops
 - With new residents spending money on goods and services in the local economy, the economic value of an area can increase significantly.
 - This also improves the perceived competitiveness of specific locations and reduces the costs of mitigating social and environmental problems associated with poor or insufficient housing.
- £1.4 billion for infrastructure, including over £630 million for new and improved schools
 - New schools need to be built alongside new housing to address the increased demand in areas of housing growth.
 - This support may come in the form of building new schools but also improving and expanding existing facilities.
 - Last year's education contributions would fund more than 41,000 new school places.
- £200 million in spending for open spaces
 - This would build more than 200 sports halls or more than 400 football pitches
- Over £50 billion in support for the local economy
 - The homes built last year generated £50 billion in economic activity, and an additional £500 million in council tax.
 - The industry also supported jobs across the country, with 800,000 people employed each year.

To highlight the way these effects are distributed on a regional level, the Home Builders Federation (HBF) has produced a series of regional reports using the most recent government housing net supply numbers. The reports also look ahead to what could be achieved if Labour's housing targets are met over the next five years.

Regional contributions



In the North West, 26,870 homes were built in 2023-24. This has supported:

- £1.2 billion for affordable housing
 - This would build 15,800 Affordable Homes.
- £760 million in spending in local shops
- £168 million for infrastructure, including over £75 million for new and improved schools
 - This could fund almost 5,000 local school places.
- Almost £25 million in spending for open spaces
 - This could build almost 30 sports halls.
- Just under £6 billion in local economic activity and 93,000 jobs including 1,150 graduate and apprenticeship positions.

The revised NPPF and Standard Method calculation gives the North West an annual housing target of 34,678 – a 60% increase on the previous target and a 30% increase on last year's delivery levels.

If this target was reached, over the course of the Parliament (five years), home building would contribute:

- £7.8 billion for affordable housing
- Almost £5 billion in spending in local shops
- £1 billion for infrastructure, including almost £500 million for new and improved schools
- Over £155 million in spending for open spaces
- Almost £40 billion in local economic activity

Conclusions

It is not just houses that developers build, but communities too. The current framework does communicate these contributions sufficiently, and a lack of local authority resource means they are often unable to deliver the benefits at the pace required.

As such, as the Government looks to overhaul the planning system there are a number of changes that could be made to better support communities and ensure people are aware of the benefits that new housing can bring:

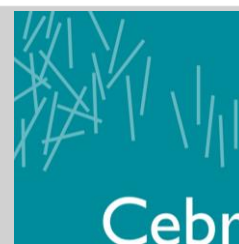
- HBF is considering how a badging scheme, similar to blue plaques, could be developed to ensure that new infrastructure and facilities funded by developer contributions are easily identifiable to the public.
- Further thought needs to be given as to how local authority planning departments can be placed on a sustainable financial footing. This will help to ensure there are sufficient staff and resources for the monitoring, allocating, and overseeing of Section 106 spending.
- Local authorities should be compelled to publish an easily digestible summary of their annual reports on their website, which includes details of how money from developers is being spent, to improve public transparency of this process
- Central Government should consider legislative options or stronger guidance to require developers' contributions to be spent by local authorities according to their negotiated purpose and within their agreed time limit.



This report has been created for New Homes Week, a campaign delivered by the Home Builders Federation.

[Newhomesweek.co.uk](https://newhomesweek.co.uk)

B. Cebr, The Economic Impact of Building Social Housing, February 2024



The economic impact of building social housing

A Cebr report for Shelter and the
National Housing Federation.

February 2024

Disclaimer

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Authorship and acknowledgements

This report has been produced by Cebr, an independent economics and business research consultancy established in 1992. The views expressed herein are those of the authors only and are based upon independent research by them.

The report does not necessarily reflect the views of Shelter and the National Housing Federation

London, February 2024

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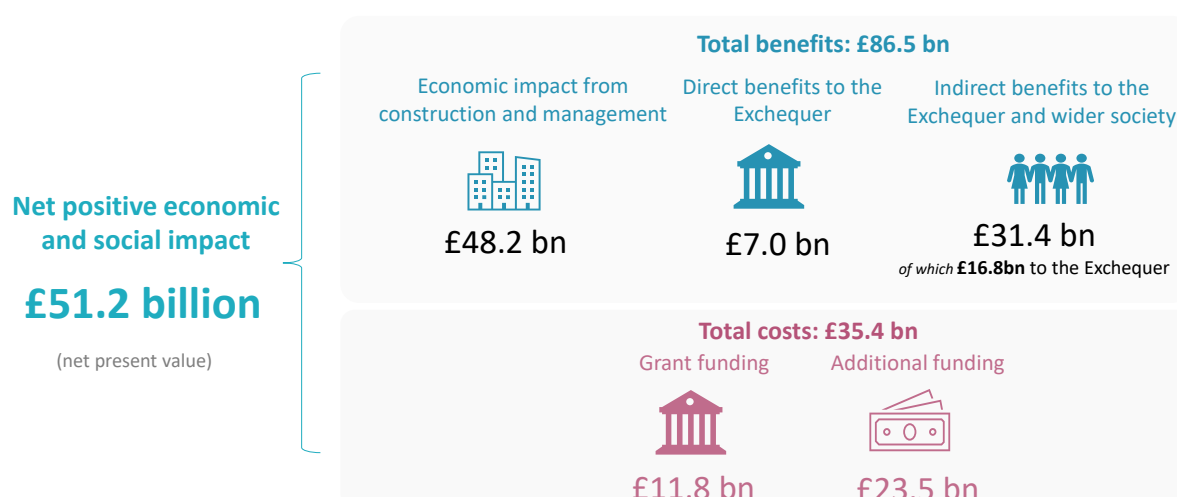
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Executive Summary

- It is widely acknowledged within the housing sector that there is a need to build a minimum of 90,000 social rented homes a year, over a span of ten years, in England.¹ This commitment is considered crucial for clearing social housing waitlists and effectively combatting homelessness.
- The Centre for Economics and Business Research (Cebr) has been commissioned by Shelter and the National Housing Federation (NHF) to assess the economic and social impacts of building 90,000 social homes – i.e. the level of delivery needed annually for a ten year period.
- Our report includes a comprehensive long-term assessment of how building social housing benefits the economy, the government, the people who will live in social homes and society at large. The specific scenario modelled within this report, is the construction of 90,000 new social homes once. This is intended to demonstrate the impact of one singular year of a scheme, which would be expected to continue over multiple years.

The combined socioeconomic value of building 90,000 social homes is estimated to be £51.2 billion



A large proportion of these impacts are realised immediately

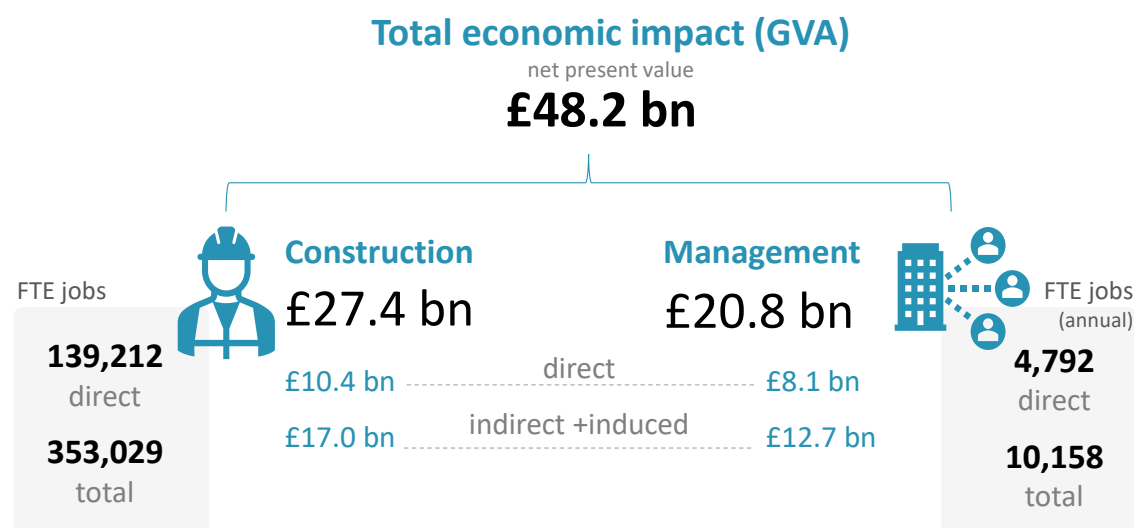
- Within the first year following construction, the programme is projected to generate substantial benefits of £32.6 billion, driven by the economic impact of construction.
- Starting from the second year onwards, it is expected to generate recurring annual benefits, resulting from:
 - management of increased social housing stock.
 - savings on housing benefits.

¹ [Housing supply requirements across Great Britain for low-income households and homeless people: Research for Crisis and the National Housing Federation; Main Technical Report](#) | Bramley, G (2019)

- wider indirect benefits including reduced homelessness, increased employment, and savings on healthcare, among others.
- These recurring benefits are projected to bring the programme to break even in the third year post-construction, achieving a positive net present value of £2.4 billion.
- We have assumed that the upfront cost of building 90,000 homes in a given year would be £35.4 billion, with one-third (£11.8 billion) funded by the government and the remaining portion covered by providers of social housing such as housing associations or local authorities. These figures serve as inputs in our models rather than findings of this report. Our analysis does not consider any potential reduction in costs that could be realised through land or planning reform, or changes in cost over time.
- The specific scope for evaluation within this report is the construction of the initial 90,000 new social homes. This is intended to demonstrate the impact of one singular year of a scheme which would be long-term. The above costs and benefits are based on the construction of the initial 90,000 social homes in the current context. Any subsequent construction phases may be subject to changes in the operating landscape, leading to potential adjustments in the underlying assumptions of our model. As such, the economic impact of successive additions of 90,000 homes may vary with evolving economic and social conditions.

The most significant impact would arise from the construction and management of these homes

- The construction and ongoing management of 90,000 social homes is expected to generate £48.2 billion in economic activity. This represents 56% of the total benefits, making it the greatest impact channel.
- Of this, £27.4 billion is attributed to the economic impact during construction. £20.8 billion represents the impact of managing more social housing.



- The construction phase is expected to directly generate £10.4 billion in Gross Value Added (GVA). This represents the direct economic activity supported during construction, which contributes to GDP.
- A further £17.0 billion in GVA is expected to be supported along the supply chains, as:
 - construction firms purchase goods and services for their operations.

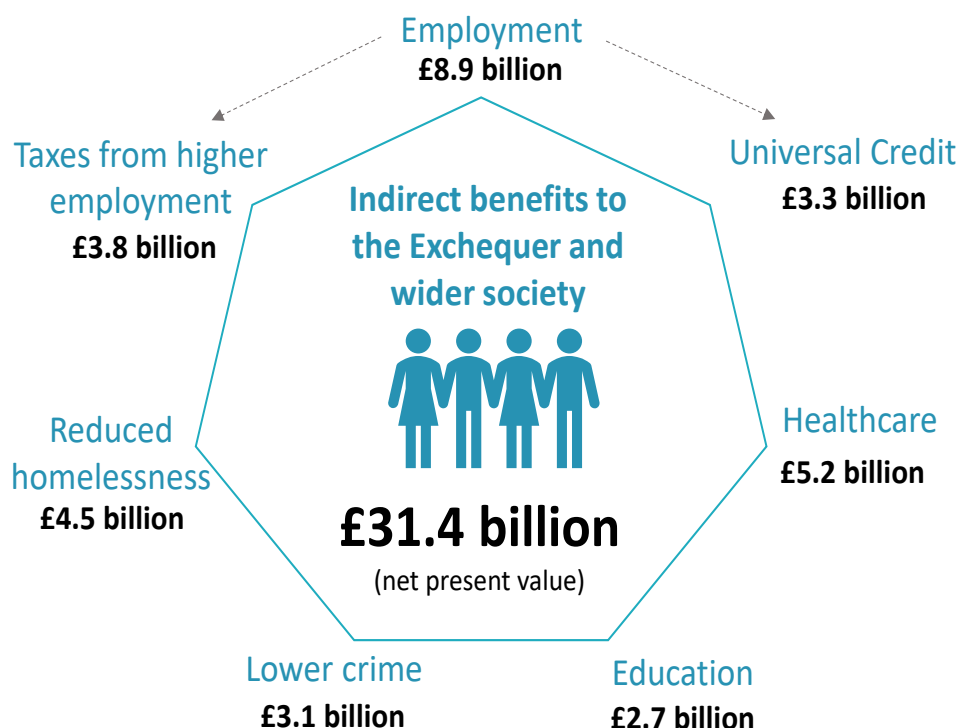
→ employees directly and indirectly involved during the construction stage spend their earnings in the wider economy.

- **Unlike the one-off impact of construction, the economic impact from the management of these social homes is recurring throughout the project's lifetime.**
- Agents involved in the management of social homes would directly generate £441 million in nominal GVA each year, resulting in a cumulative present value of **£8.1 billion** over 30 years. Along their supply chains and through employee spending in the wider economy, a further £691 million would be annually supported, summing up to a present value of **£12.7 billion**.
- The analysis also highlights the role of grant funding for social housing in **boosting and stabilising the construction industry overall, especially in times of recession.**

Building 90,000 social rent homes would support more than 350,000 jobs

- Building 90,000 social homes would **directly support over 139,000 jobs, resulting in £4.8 billion in wages and benefits** paid to individuals directly involved in construction (nominal employee compensation).
- **The construction stage has the potential to sustain over 353,000 jobs** when considering the multiplier effects along supply chains and employee spending in the wider economy. This translates to £13.6 billion in total employee compensation.
- Similarly, **the management of these homes is expected to directly support 4,792 jobs annually**. Extending the analysis to include supply chain impacts and employee spending, this figure could rise to **10,158 jobs annually**. These represent an annual employee compensation of £247 million and £560 million in nominal terms, respectively.

Moving households to social homes would generate £31.4 billion in indirect economic benefits to the Exchequer and wider society



- Social rented housing, with rents tied to local incomes, is the most affordable housing option. On average, rents are typically about 50% of market rents. It is also more stable than the private rented sector, as people in social housing usually have secure tenancies, giving them stronger rights and greater protection from eviction. This stable foundation leads to numerous benefits for tenants and wider society, which often translate to fiscal benefits for the Exchequer. The addition of 90,000 social rent homes is anticipated to generate indirect benefits across the following areas:

Employment

- A stable home increases people's access to employment and their productivity. The cumulative value of this channel is estimated at **£8.9 billion** with a further benefit of **£3.8 billion** to the Exchequer through increased tax revenue.

Universal Credit

- Due to higher employment, yearly UC claims would be cut by £1,218 per household, adding up to a saving of **£3.3 billion** for the Exchequer over the long term.

Healthcare

- Social housing tends to have fewer health hazards like damp and mould than private rented properties. A stable home is also linked to better wellbeing. Introducing 90,000 new social homes could save the NHS **£5.2 billion**.

Homelessness

- There would be fewer people living in temporary accommodation and requiring homelessness assistance, leading to cumulative savings of **£4.5 billion** for local authorities.

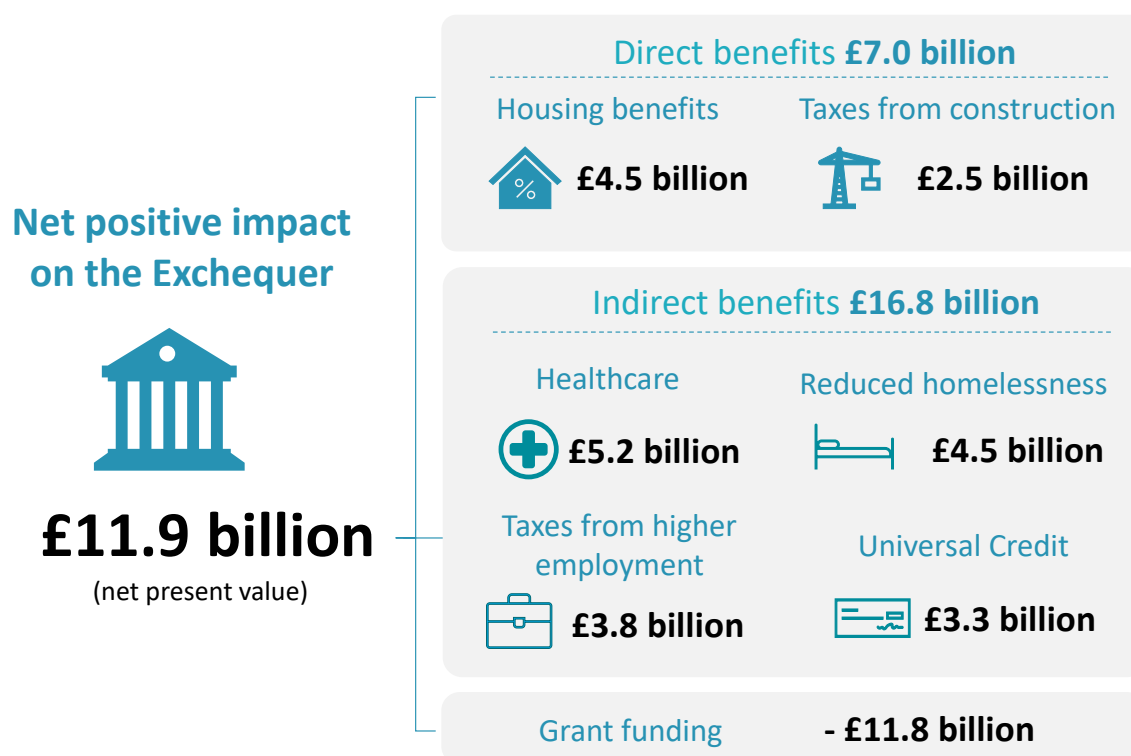
Lower crime

- Research shows social housing leads to fewer police callouts and tenants experiencing less crime. Introducing 90,000 new social homes could save **£3.1 billion**.

Education

- Unfit housing harms children by disrupting their education, which leads to lower economic contributions, increased crime, and greater use of public services. 90,000 new social homes would reduce such disruptions and lead to overall savings of **£2.7 billion**.

Funding the programme would generate a net positive value of almost £12 billion to the government over 30 years



- Shifting households from the private rented sector to social housing is estimated to lead to **direct annual savings of £243.8 million to the Exchequer in housing benefits**. Over 30 years, this would lead to **total savings of £4.5 billion** in present value.
- Additionally, increased economic activity in the construction sector is projected to yield **£2.5 billion in tax revenue**.
- Adding these to the indirect benefits described above results in **total benefits of £23.7 billion** for the Exchequer. This is twice the cost of the estimated grant funding, which is assumed to be £11.8 billion in capital grants, based on no land or planning reform to reduce costs.
- From the Exchequer's perspective, the project is anticipated to reach a break-even point in 11 years following construction, thereafter yielding a positive net present value.
- Over 30 years, the **net impact for the Exchequer of funding 90,000 social homes is expected to be positive, with a net benefit of £11.9 billion**.

1. Introduction

1.1 Background

There is a housing emergency in England with the highest levels of homelessness since records began.² This issue has attracted considerable attention from the media, government, industry, and organisations alike. The NHF recently published a report³ examining the consequences of not addressing this crisis.

This report will not explore the potential causes of this under-supply, nor estimate the amount of housing needed to meet the current demand. Rather, we aim to assess the impact of building 90,000 new social rent homes – the commonly accepted level required annually for 10 years to meet housing need.⁴ This is assessed in terms of economic and social impacts.

The specific scope for evaluation within this report is the construction of the initial 90,000 new social homes.⁵ This is intended to demonstrate the impact of one singular year of a scheme which would be long-term.⁶

We also acknowledge that increasing housebuilding capacity to facilitate the construction of 90,000 social rent homes per year would take time. This is unlikely to be achievable, even with political will, within the next year. Our analysis models the benefit of 90,000 new social homes, agnostic to the period required to increase capacity.

Social rent homes are built using grant funding from central government and rented by housing associations or local councils to individuals in need. The rent paid by tenants is lower and pegged to local incomes – but typically about 50% of the local market rate. Figure 1 shows how the 90,000 new social rent homes needed annually are distributed across England (according to the 2018 Crisis & NHF report referenced above). This regional distribution forms the basis for our analysis.

² [Homelessness in England 2023 - Shelter England](#).

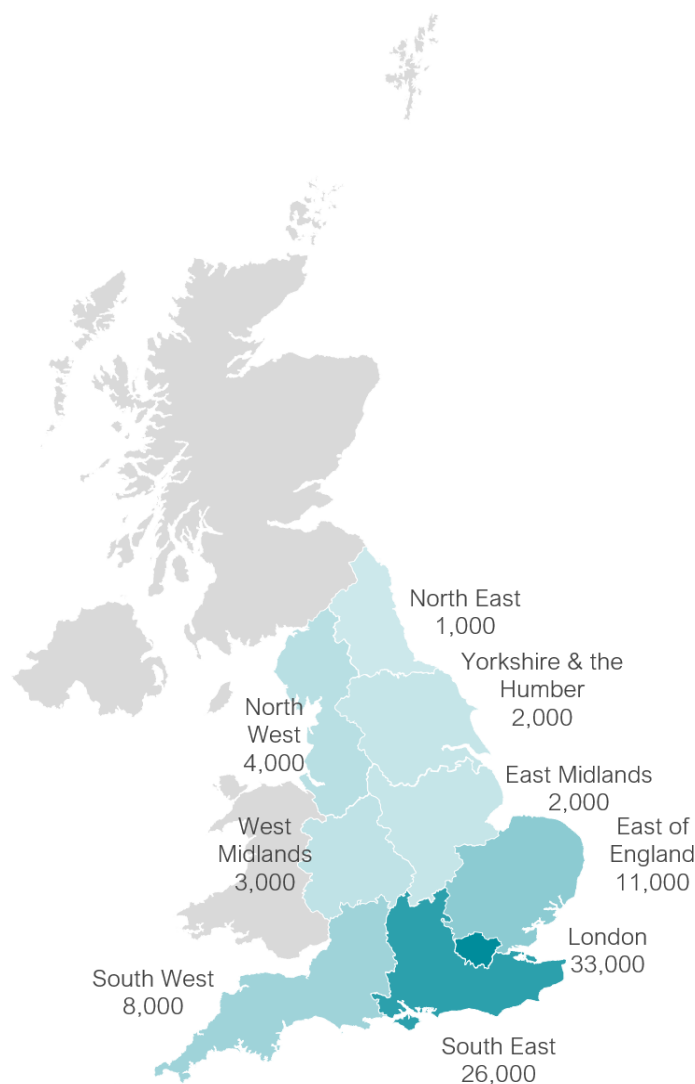
³ ['The housing crisis: what will happen if we don't act?'](#) | NHF (2023)

⁴ ['Housing supply requirements: low-income households & homeless people'](#) | Crisis & NHF (2018)

⁵ Note that the terms social homes or social housing are used interchangeably throughout this report to denote social rent.

⁶ Note that any subsequent batches beyond the initial 90,000 may be subject to changes in the operating landscape, leading to potential adjustments in the underlying assumptions of our model. As such, the financial considerations and outcomes for the subsequent phases may vary with evolving economic and social conditions.

Figure 1: Regional distribution of social rent home requirements



Source: Crisis & NHF report (2018)

1.2 Scope of the report

This is a report by the Centre for Economics and Business Research (Cebr), on behalf of the National Housing Federation (NHF) and Shelter, assessing the economic and social impacts of social housing.

Our report focuses exclusively on the construction and management of 90,000 new social rent homes and the resulting economic and social benefits. Part of the analysis considers the impacts over a 30-year timeline of the construction of 90,000 homes at the start of the assessed period. This is because some benefits, such as increased economic activity supported by the management of more social housing, would recur over the period and are not exclusively felt in the short term.

Determining the precise moment in time when these benefits are realised is not the aim of this research. Although certain assumptions are made about when some impacts would occur, this is only used as an input for the net present value analysis.

Given the different areas of the analysis considered within our study, we have relied upon a range of sources, from official government statistics to industry reports and internal data

shared by Shelter and NHF. These sources are discussed in more detail in the next section, alongside the wider assumptions and methodologies employed.

1.3 Report overview

The remainder of the report is structured as follows:

- **Section 2: The economic impact of building 90,000 social homes**

Estimating the aggregate economic impact of building and managing 90,000 social homes.

- **Section 3: Indirect benefits to the Exchequer and wider society**

Assessing the second-order effects of tenure shifts and resulting socioeconomic benefits across areas such as homelessness, crime, education, employment, healthcare etc.

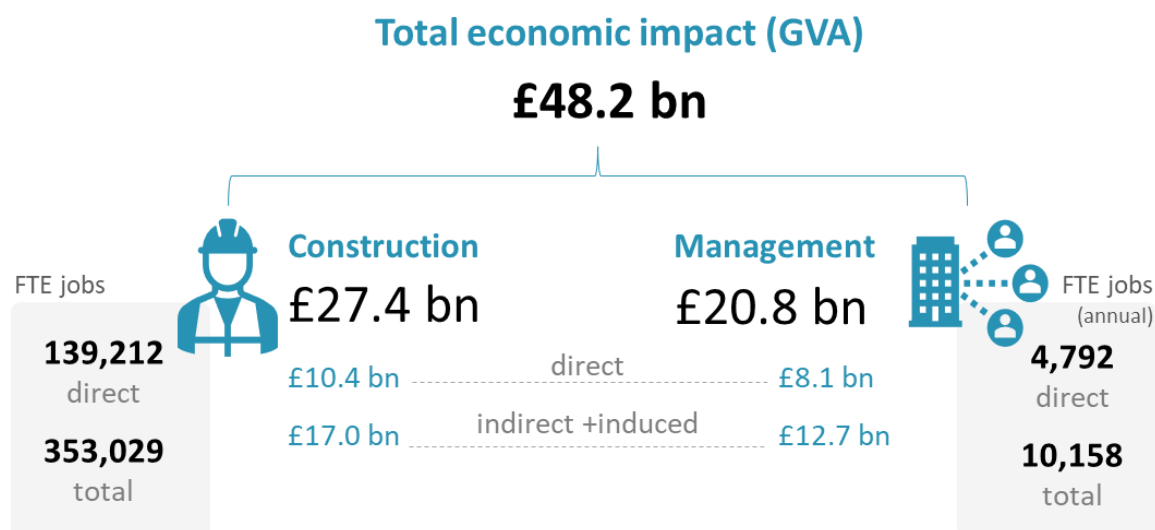
- **Section 4: Overall impact on the Exchequer**

Estimating the overall cost of funding this programme to the Exchequer. This includes an assessment of cost savings from the relocation of benefit-receiving households from the private rented sector (PRS) to social housing.

- **Section 5: Combined socioeconomic value**

Aggregating the impacts calculated across sections 2-4 to estimate the net present social and economic value of building 90,000 social homes.

2. The economic impact of building 90,000 social homes



Note: figures may not add up due to rounding

In this section, we discuss the economic impact of building 90,000 new social rent homes. The impacts we consider here are in nominal terms, as opposed to net present values like those presented in the executive summary and the infographic above. The economic impacts in Sections 2.2 and 2.3 are presented for the first 90,000 social homes built, and they are later embedded in the overall net present value analysis by summing up the yearly impacts of managing the first 90,000 homes along with a discount factor.

2.1 Methodology

The economic impact analysis is made up of two complementary sections. Initially, we evaluate the impact of building these 90,000 homes and then we estimate the impact of managing more social housing.

These sections consider different areas of economic activity generated and supported throughout the wider economy. As such, the methodology employed to calculate these impacts is not the same – e.g. some of the inputs, outputs, and assumptions are different. However, the same core economic principle underpins the analysis.

Below we define the economic indicators used to measure the economic impact of social housing. Then we explain the concept of an industry's (or organisation's) economic footprint, in terms of the impact layers that make up the contribution of new social housing. Lastly, we outline the assumptions made and inputs used with regard to the construction and management of new social housing.

Direct impacts

Our analysis considers several key economic indicators, summarised below:

- **Turnover:** this is only used for the analysis presented in Section 2.3. It represents the revenues, or income, generated by housing associations and local councils who manage social housing.

- **Gross Value Added (GVA):** GVA contributions represent the ‘value-added’ to the economy. For this report, we take the income approach to estimating GVA and define it as the total compensation paid to employees + total operating profit. It is often used as a proxy for estimating the contribution of an organisation or industry to GDP.
- **Employment:** the number of workers employed in the construction and management of social housing. The employment presented for the construction impact is on a full-time equivalent (FTE) basis. FTE refers to the hours worked by one employee who is employed on a full-time basis and is used to standardise the hours worked by several part-time employees to one full-time worker. This is important for comparisons across industries or organisations, where the share of employees who work full-time varies. The employment presented for the management impacts is in terms of headcount employment, i.e. the total number of workers employed at a given point in time. Therefore, the employment impacts for these two areas of the analysis are not comparable.
- **Employee Compensation** (or Compensation of Employees): the total compensation paid to employees in return for work done. This includes wages, benefits, and employer pension and tax liabilities.

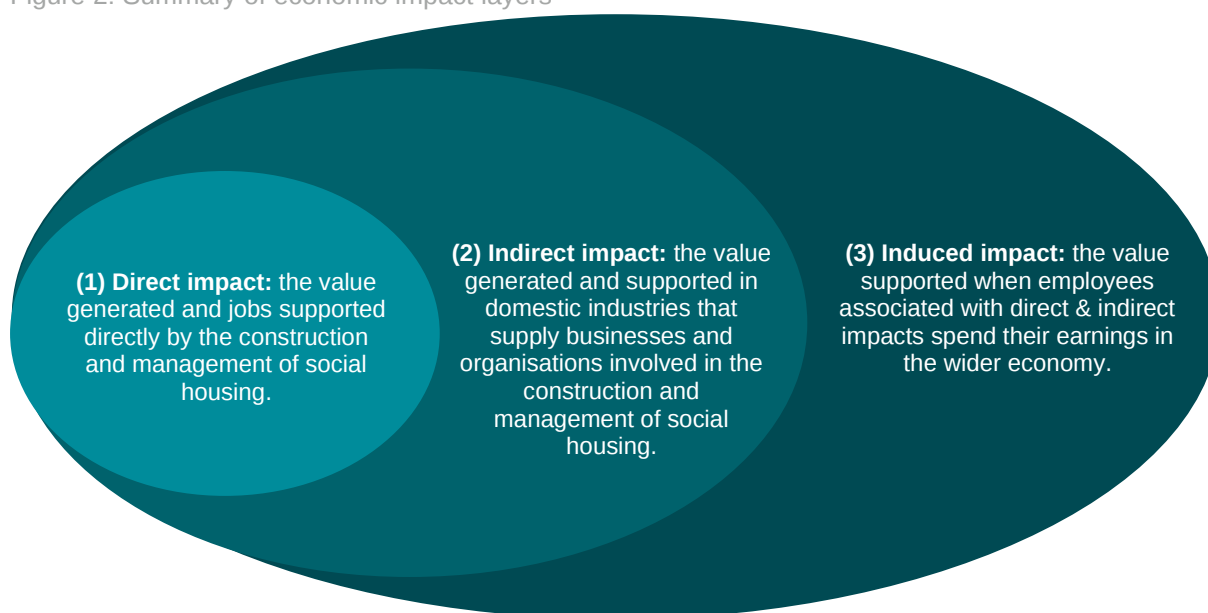
Aggregate impacts

The wider footprint supported by the construction and management of social housing is comprised of three economic impact layers:

1. **Direct impacts:** the economic impact directly generated by investment in building new social homes. This constitutes the direct dependency of economic activity and jobs on new housebuilding, primarily in the construction sector and constituent industries.
2. **Indirect impacts:** activity supported through the **supply chains** that feed into the day-to-day of this construction. This focuses on the economic activity (including GVA and other key metrics) **supported when construction sector organisations purchase goods and services from suppliers**. This impact layer examines the knock-on impact of **upstream** activity to show the impact of housebuilding on the wider **economy in England**.
3. **Induced impacts:** economic activity supported when direct and indirect (supply chain) employees spend their earnings on goods and services in the wider economy in England, thus facilitating induced impacts that provide further layers of support.

Summing these direct, indirect, and induced impact layers allows us to estimate the **aggregate footprint** supported by investment in social housing in England. Our approach is summarised in Figure 2 below.

Figure 2: Summary of economic impact layers



Source: Cebr

To model the relationships that exist between these impact layers, we use bespoke input-output models. These models examine the structure of an organisation or industry's supply chain and quantify the economic activity it supports. In addition, by considering the typical distribution of household spending, the model allows us to calculate the output and employment associated with the induced impact layer.

Our modelling produces multipliers, which calculate the total footprint supported for a given level of direct contributions. For example, a GVA multiplier of 2.5 would be interpreted as "for every £1 directly generated by the construction or management of social housing, a further £1.50 is supported elsewhere in the economy, producing an aggregate GVA supported of £2.50".

By combining these multipliers with the calculated direct impacts, we form our estimates for the aggregate footprint supported by the investment in social housing across England.

Regional impacts

A key aspect of our analysis is that it is based on a bottom-up approach. We estimate the economic impact at a regional level and then aggregate these figures at a national level. Crucially, this allows us to account for any regional differences which results in more granular and accurate estimates.

Investment costs

Before estimating the economic impact associated with building and managing new social housing, we need to establish the level of investment that would be associated with 90,000 new social homes.

One of the key inputs used to estimate the impact of building these homes is the per-home cost of social rent housing. We refer to data from a 2019 NHF report ⁷ which gives the total

⁷ ['Capital grant required to meet social housing need in England 2021-2031'](#) | NHF (2019).

cost per home,⁸ subsidy gap per home, and the grant funding required per home, broken down by type of affordable housing. The figures from this report are converted to 2023 prices for our analysis.

The NHF report only provides data at this level for London and for the rest of England. Therefore, to account for regional variations outside of London, we rely on data from the Shared Ownership and Affordable Homes Programme (SOAHP)⁹ which ended in 2021. We use the costs for social rent homes across regions to adjust for the figures outside of London.

The results from this are shown below.

Table 1: Social rent investment costs per home, 2023 prices

Region	Grant funding per home	Total cost per home
North East	149,242	297,562
Yorkshire and the Humber	165,764	330,505
North West	156,468	311,970
East Midlands	130,039	259,276
West Midlands	141,948	283,019
South West	181,154	361,190
East of England	181,829	362,536
South East	159,953	318,918
London	252,646	503,732

Source: NHF, Homes England, Cebr analysis

The respective costs per home are then combined with the number of social homes to be built across each region, thus establishing the overall costs for all the regions. Despite these adjustments and calculations, the figures do not represent any new analysis and are only used as inputs for our analysis of economic activity supported as a result of this investment.

We consider the costs of social housing investment in terms of the total funding needed to build 90,000 new social rent homes once. Crucially, we assume that the government does not provide grant funding for all these homes. Per conversations with Shelter and the NHF, we assume that two-thirds of the 90,000 homes are at least partially funded through government grant funding, with the remaining third funded through cross-subsidy such as S106. These shares are assumed to be consistent across regions, with the resulting regional breakdown presented below.

⁸ Total cost per home here refers to the overall scheme costs per home, in other words, the average cost to build a single home.

⁹ [Shared Ownership and Affordable Homes Programme 2016 to 2021 summary](#) | Homes England (2022)

Table 2: Social rent homes per region

Region	Homes	Homes (grant funded)	Associated Government funding (£m)
North East	1,000	667	99
Yorkshire and the Humber	2,000	1,333	221
North West	4,000	2,667	417
East Midlands	2,000	1,333	173
West Midlands	3,000	2,000	284
South West	8,000	5,333	966
East of England	11,000	7,333	1,333
South East	26,000	17,333	2,773
London	33,000	22,000	5,558

Source: Crisis & NHF report (2018), Cebr analysis

Based on current grant rates and estimates of regional housing need, updated to 2023 prices, the total cost of building 90,000 social rent homes would be £35.4bn. Of this, £11.8bn would be government funding, equivalent to approximately 33% of the total investment.

Construction impacts

For the calculation of the economic impact supported through the construction of social housing, we have leveraged an existing Cebr model – the Local Economic Impact Calculator (LEIC)¹⁰ – developed for previous work for the NHF.

We adjust the relevant parts of the modelling to tailor it for social housing; we change some of the inputs from all affordable housing to social rent homes alone. Specifically, the key difference for this analysis is the per-home cost of social rent housing (covered in detail above).

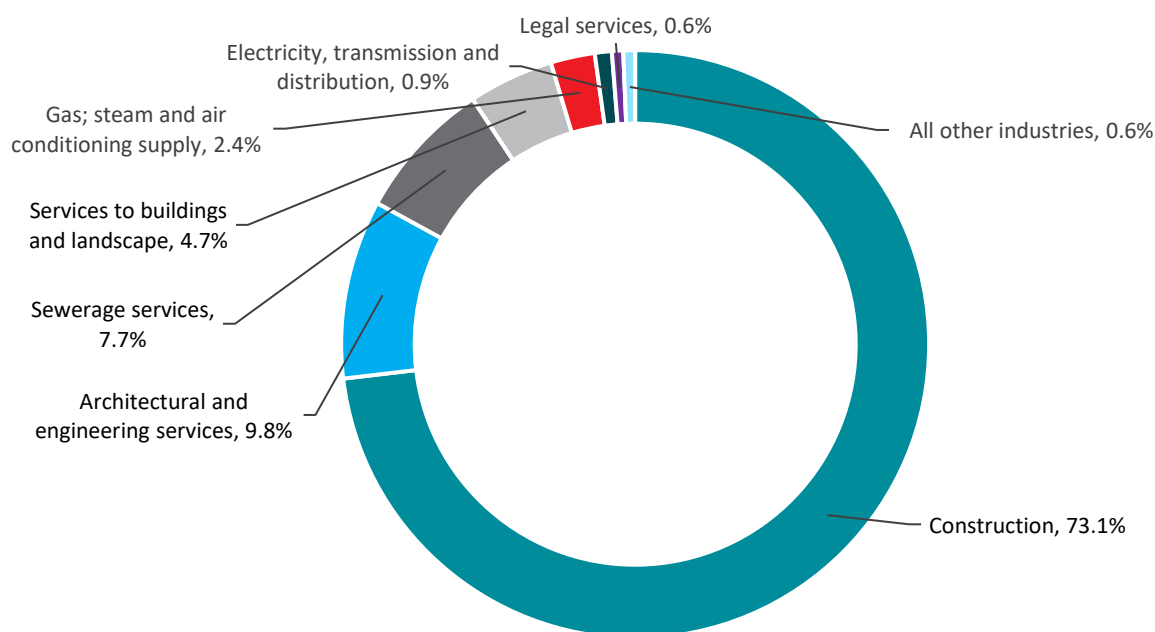
To estimate the level of economic activity supported, we rely on data from the supply-use tables published by the ONS to calculate the main ratios for the relationships between the key economic metrics (i.e. GVA, employment and employee compensation). This allows us to extrapolate and estimate the economic impacts associated with the construction of these social homes.

The input-output modelling which underpins the calculation of the aggregate impacts is based in part on data previously shared by the NHF. This data allows us to map procurement spending by organisations involved in housebuilding projects to Standard Industrial Classification (SIC) codes. We can then use the national accounts framework to understand the linkages between housebuilding activities and the related industries that supply goods and services.

Figure 3 below shows the industries supplying goods/services to organisations and businesses involved in the construction of social homes.

¹⁰ [Local Economic Impact Calculator](#) | NHF (2022)

Figure 3: The main industries that supply goods and services to housebuilding businesses



Source: NHF, Cebr analysis

Economic impact of managing social housing stock

Much like the construction impacts, the modelling for the management of social housing stock is based on the existing LEIC framework. However, the methodology relies less on wider industry data and is more specific to the activities of housing associations (HAs). Data provided by the NHF on employment, turnover, and the housing stock managed by HAs which are NHF members is central to the analysis.

This data allows us to calculate per-home turnover and employment metrics, which is then the key input used to extrapolate for the overall turnover impacts per region. However, the turnover and employment data shared by the NHF is not exclusively related to social rent and includes other types of tenures. To our knowledge, a more granular dataset does not exist.

The data discussed above is likely to overstate the revenues per social rent home and thus represent an overestimate of the overall turnover impacts. However, in the absence of better data, it is the best input for our analysis. The GVA and employee compensation metrics are then estimated based on data from wider supply-use tables.

Once the direct impacts are estimated, we use further data supplied by the NHF from members through which we can map their supply-chain spending. From this data, we can calculate the multipliers and therefore the aggregate impacts.

2.2 Economic impact of building social housing

2.2.1 Direct impacts

This section details the direct impact of construction at a national level. Our results are presented for a single year in terms of three of the key economic indicators discussed earlier: Gross Value Added (GVA), employment, and employee compensation.

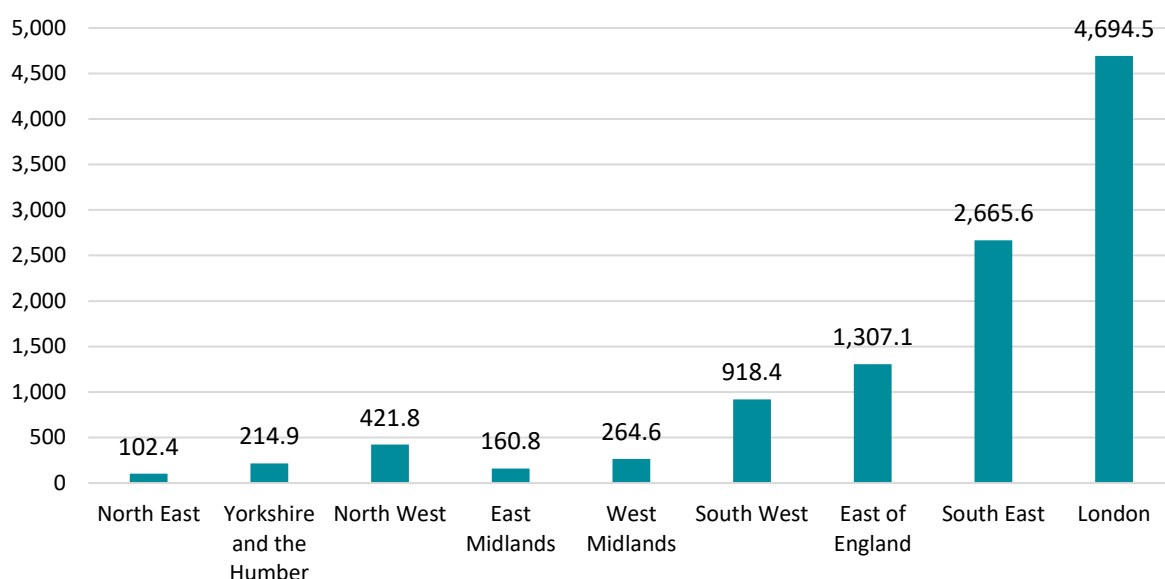
Building new social homes supports economic activity among businesses and organisations involved in the construction and their wider supply chain. As shown in this section, the impact of the construction represents a significant boost to the economy in England.

GVA through construction

In the context of this analysis, GVA represents the value added by the organisations that would build the 90,000 social homes when they purchase construction materials (or other goods and services) from other firms or industries and use them to build these homes. GVA is typically used to consider the contribution of an organisation or industry to GDP.

Figure 4 below illustrates the GVA generated by the housebuilding activities associated with the level of social housing discussed. **For a single year, the GVA associated with the total cost of building 90,000 social rent homes is £10.8bn across England.** Unsurprisingly, the biggest GVA impact is generated in London (£4.7bn). This is primarily because a third of the total homes are assumed to be built in the capital, more than any other region in England.

Figure 4: GVA supported by the construction of 90,000 social rent homes, £m

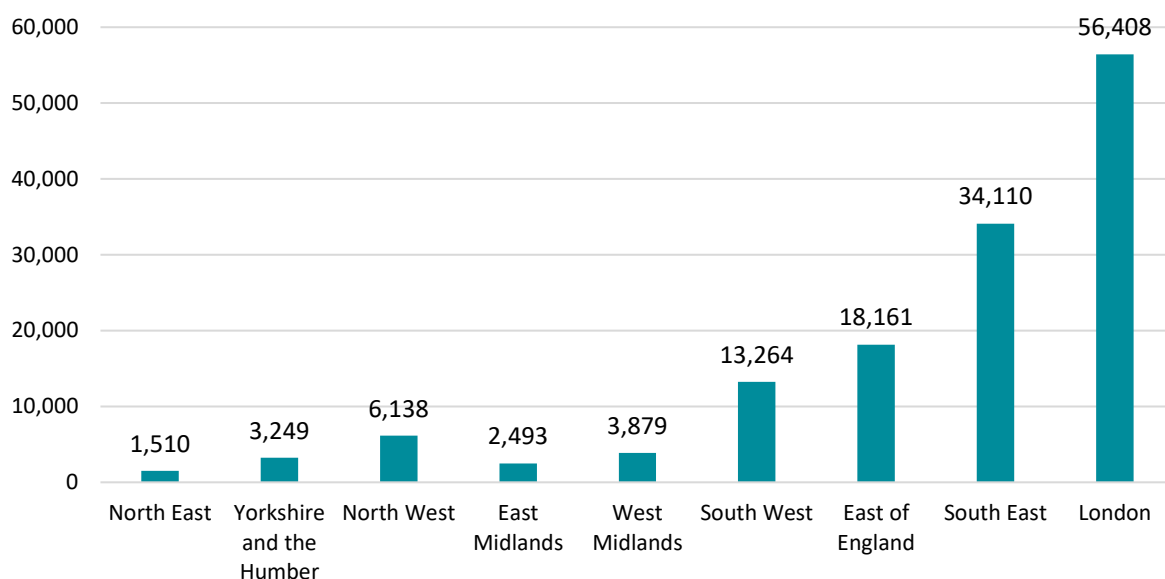


Source: NHF, ONS, Cebr analysis

Employment through construction

Figure 5 presents the estimated employment supported through social housing construction, in terms of the number of jobs created during the construction period. **Almost 140,000 jobs are directly generated by the housing programme across England.**

Figure 5: Employment supported by the construction of 90,000 social rent homes, FTE jobs

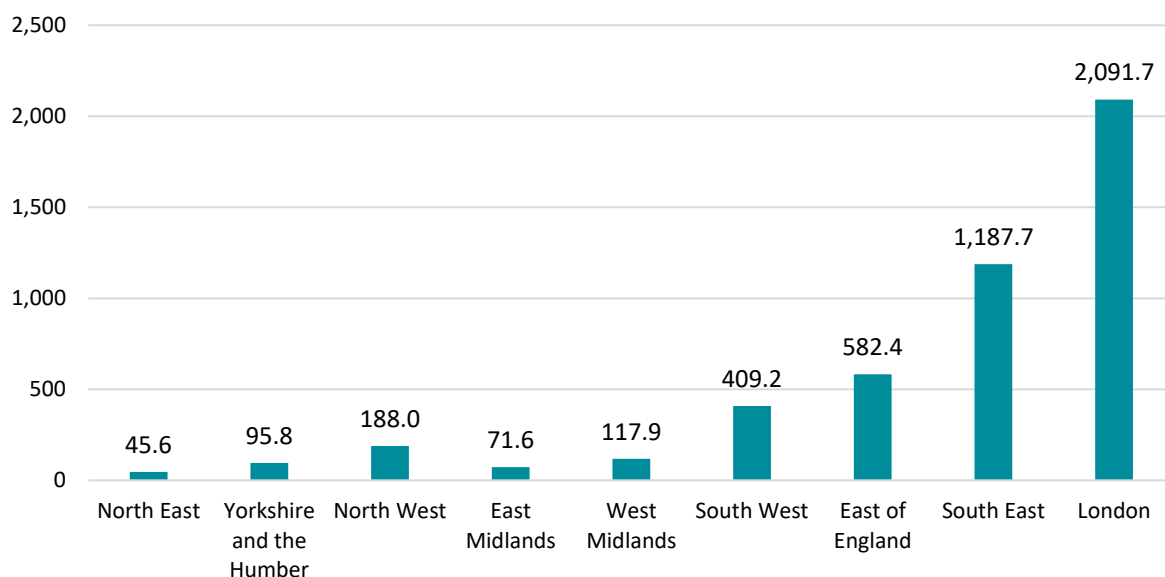


Source: NHF, ONS, Cebr analysis

Employee compensation

Employee compensation, or compensation of employees (COE) refers to the total remuneration or compensation paid to employees in return for their labour. **We estimate that a total of £4.8bn in wages, benefits, employer pension and tax liabilities is supported in England.** Figure 6 below shows this breakdown by region, showing a similar distribution as the other economic indicators considered.

Figure 6: Employee compensation supported by the construction of 90,000 social rent homes, £m



Source: NHF, ONS, Cebr analysis

2.2.2 Aggregate impacts

The wider economic footprint of construction goes beyond the direct impacts discussed in the prior section. This subsection identifies the aggregate footprint supported by considering two further impact layers:

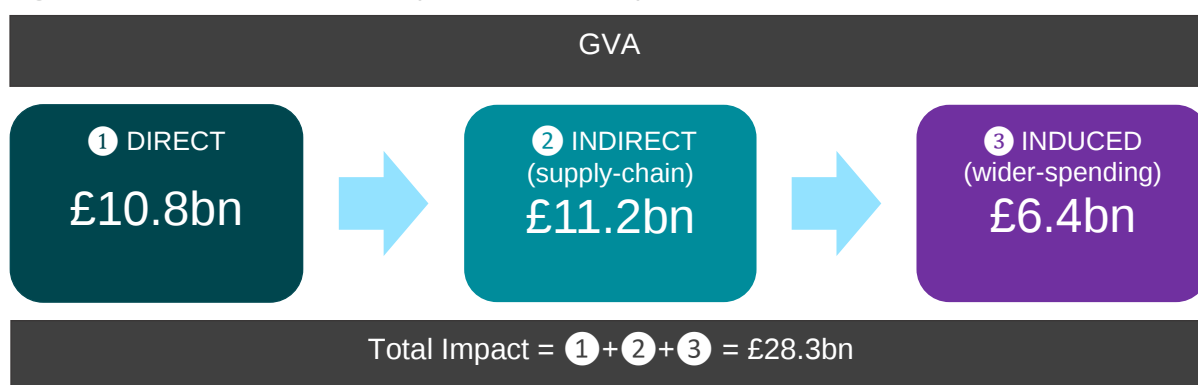
- **Indirect impacts:** the construction of social homes places demands on upstream supply chains, where construction firms purchase goods and services. The indirect impact captures the GVA, employment, and employee compensation supported along the supply chains of these operations.
- **Induced impacts:** the workers who receive income and employment benefits through the direct and indirect channels spend their increased earnings in the wider economy. This supports additional economic activity in the impacted sectors.

Summing these direct, indirect, and induced impact layers allows us to estimate the **aggregate footprint** supported.

GVA

As shown in the previous subsection, the direct GVA generated stands at £10.8bn. Our modelling suggests that a further £10.4bn worth of GVA contributions are supported along the supply chains (indirect effect). An additional £6.4bn is supported when employees from the construction sector (and employees along their supply chains) spend their earnings in the wider economy. Combining these three impact layers, **we estimate that the construction of 90,000 social rent homes would support an aggregate economic footprint of £28.3bn, as measured by GVA.**

Figure 7: Gross Value Added multiplier results, 2023 prices



Source: NHF, ONS, Cebr analysis

Alternatively, this can be interpreted as: **for every £1 in GVA directly generated, a further £1.43 is supported through the indirect and induced impact channels, producing a total GVA multiplier of £2.43.**

We also present the aggregate GVA supported in each region, broken down in terms of the three impact layers, in Table 3 below. These multipliers should be interpreted at a regional level. Multipliers measure the extent to which an organisation or industry relies on external suppliers to produce the goods and services they sell.

At a regional level, multipliers focus exclusively on the *in-region* supply chain and associated wider economic activity supported through the induced layer. If the supply chain extends beyond the geographical boundaries of a region, this would not be captured within the regional multiplier (although it would be at a national level). In other words, the England multiplier captures the supply chain linkages between regions, which the regional multipliers do not. Therefore, the simple summation of the regional aggregate figures will be lower than the aggregate impacts for England.

Table 3: Regional aggregate GVA impacts, £m

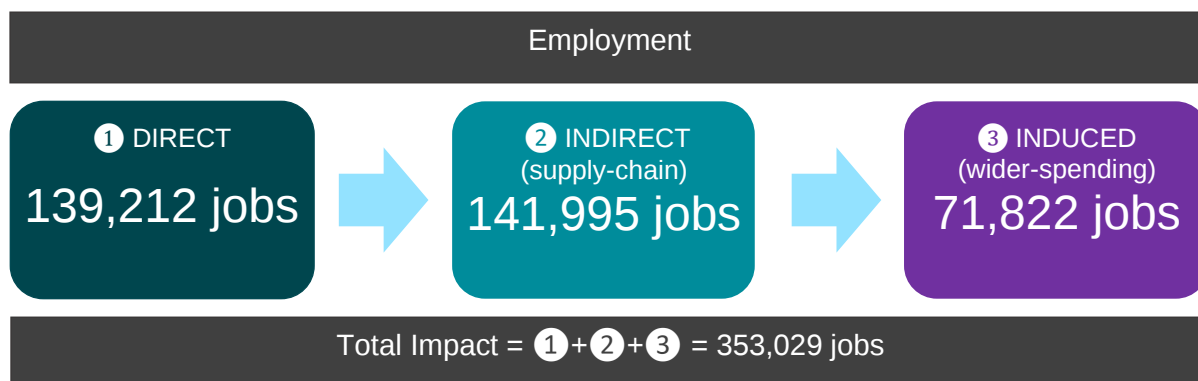
Region	Direct impacts	Indirect impacts	Induced impacts	Aggregate impacts
North East	102	90	49	242
Yorkshire & the Humber	215	198	122	534
North West	422	389	236	1,047
East Midlands	161	140	91	392
West Midlands	265	235	135	635
South West	918	828	523	2,270
East of England	1,307	1,102	696	3,106
South East	2,666	2,421	1,398	6,484
London	4,694	4,343	3,274	12,311
England	10,750	11,155	6,408	28,313

Source: NHF, ONS, Cebr analysis

Employment

We can also consider the same outputs in terms of the employment impacts. Figure 8 illustrates the employment multipliers and associated aggregate employment impacts for the construction of social housing. **Building 90,000 new social rent homes supports an aggregate, or total, employment contribution of over 350,000 jobs.**

Figure 8: Employment multiplier results, 2023 prices



Source: NHF, ONS, Cebr analysis

For every job directly generated, a further 1.02 jobs are supported along the supply chains. An additional 0.52 are supported when employees associated with the direct and indirect impact layers spend their earnings in the wider economy. This means that, **for every job directly generated by the social housing investment, a further 1.54 jobs are supported in the wider economy in England.**

We present the aggregate employment supported in each region, broken down in terms of the three impact layers, in Table 4 below.

Table 4: Regional aggregate employment impacts, FTE jobs

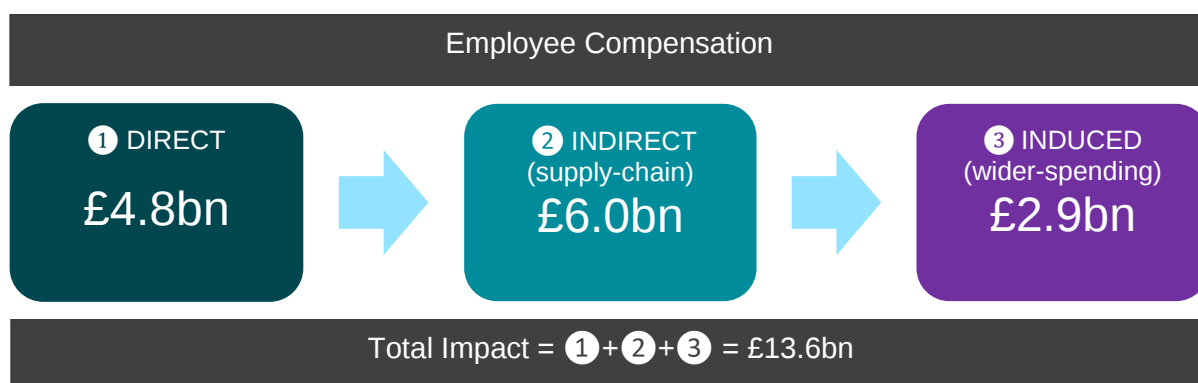
Region	Direct impacts	Indirect impacts	Induced impacts	Aggregate impacts
North East	1,510	1,299	621	3,431
Yorkshire & the Humber	3,249	2,956	1,589	7,793
North West	6,138	5,650	2,977	14,765
East Midlands	2,493	2,170	1,228	5,891
West Midlands	3,879	3,407	1,713	8,999
South West	13,264	11,804	6,521	31,589
East of England	18,161	15,470	8,431	42,063
South East	34,110	30,937	15,493	80,541
London	56,408	51,585	33,650	141,643
England	139,212	141,995	71,822	353,029

Source: NHF, ONS, Cebr analysis

Employee compensation

Finally, we consider the aggregate employee compensation supported by construction activities associated with the investment discussed. Below we present the wider employee compensation impacts, broken down into the indirect and induced impacts layers. Combining these three impact layers, **we estimate that an aggregate economic footprint of £10.9bn as measured by employee compensation is supported through the construction of 90,000 social rent homes.**

Figure 9: Employee compensation multiplier results, 2023 prices



Source: NHF, ONS, Cebr analysis

This can also be interpreted in the following way: **for every £1 in employee compensation directly generated, a further £1.24 of compensation is supported through the indirect impact channel.** (i.e., through the supply chain). **An additional £0.60 of compensation is supported through the induced impact channel** (i.e., when employees from direct and indirect impact channels spend their earnings across the wider economy).

We present the aggregate employee compensation supported in each region, broken down in terms of the three impact layers, in Table 5 below.

Table 5: Regional aggregate employee compensation impacts, £m

Region	Direct impacts	Indirect impacts	Induced impacts	Aggregate impacts
North East	46	48	22	115
Yorkshire & the Humber	96	105	54	255
North West	188	208	105	501
East Midlands	72	74	40	186
West Midlands	118	125	60	302
South West	409	439	231	1,079
East of England	582	589	309	1,481
South East	1,188	1,286	618	3,092
London	2,092	2,315	1,435	5,842
England	4,790	5,952	2,864	13,606

Source: NHF, ONS, Cebr analysis

2.3 Economic impact of managing social housing

This section discusses the direct economic footprint of managing the *additional* stock of social housing at a national and regional level. Furthermore, we present the aggregate economic footprint, as measured by its direct, indirect, and induced impact layers. Building new social homes supports economic activity among organisations involved in their management and operation.

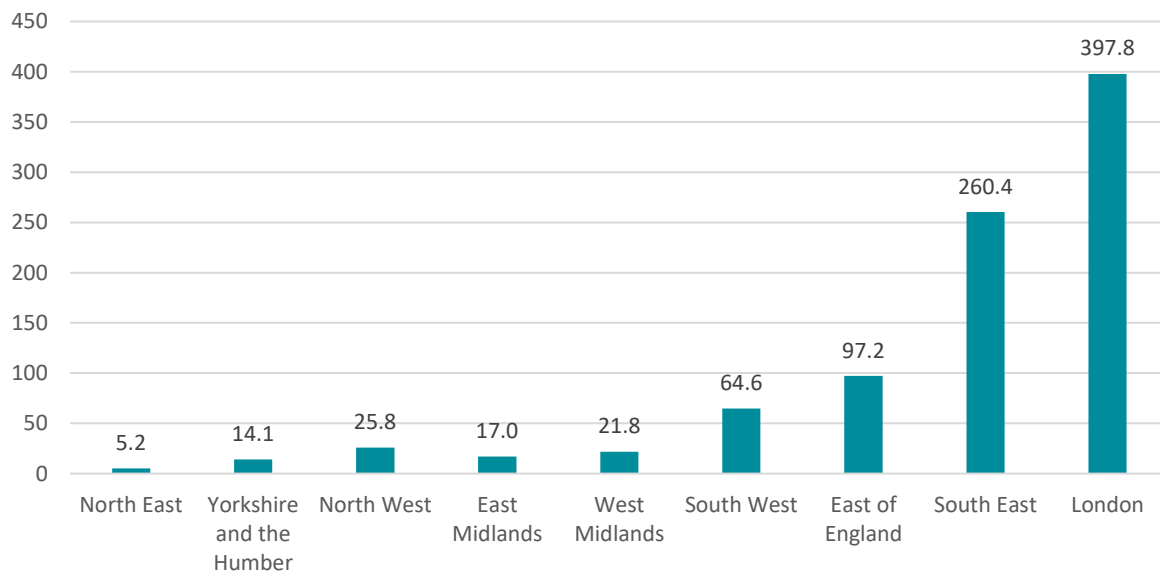
This analysis extrapolates estimates for the economic impact of managing the *existing* stock of social housing. These impacts are presented in the Appendix.

2.3.1. Direct impacts

Turnover

We estimate that the management of 90,000 new social rent homes would directly generate almost £1bn in turnover across England (£904m) for housing associations and local councils. Figure 10 below shows this direct turnover broken down by region. Not surprisingly, London is the biggest contributor to turnover, with almost £400m generated there alone. The distribution is the same as for the previous section and is primarily driven by *where* these homes are being built, rather than the relative output generated by each region.

Figure 10: Direct turnover of managing increased social housing by region, £m, 2023 prices

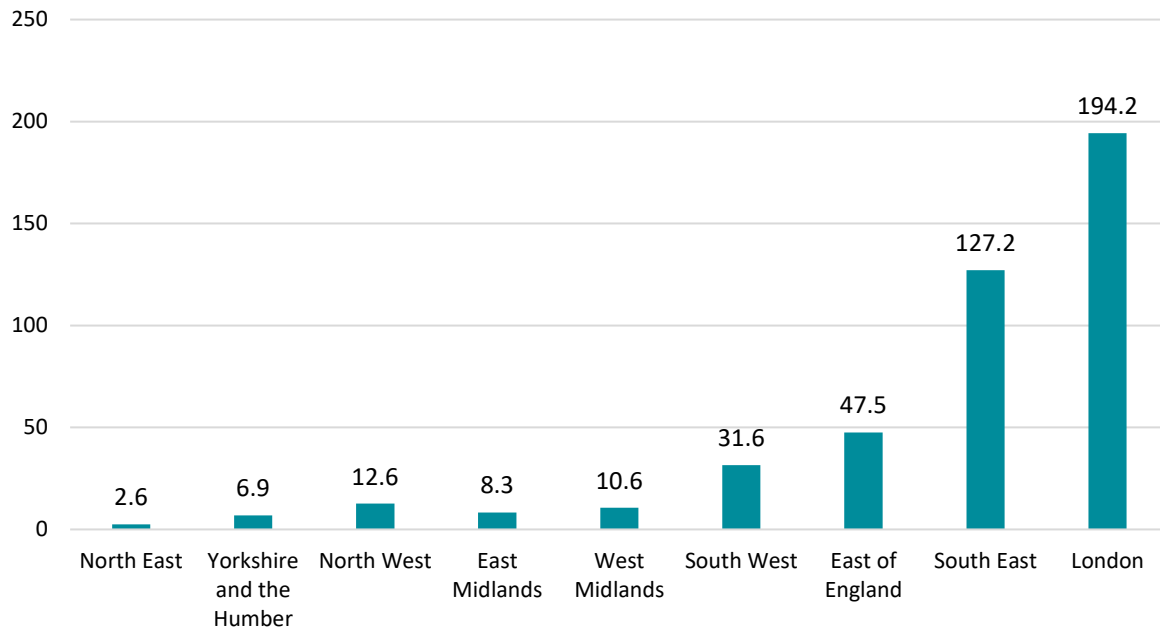


Source: NHF, ONS, Cebr analysis

GVA

The economic impact of managing the additional 90,000 social homes, in terms of GVA, stands at £441m annually. Figure 11 shows the distribution of the value added by region.

Figure 11: Direct GVA of managing increased social housing by region, £m, 2023 prices

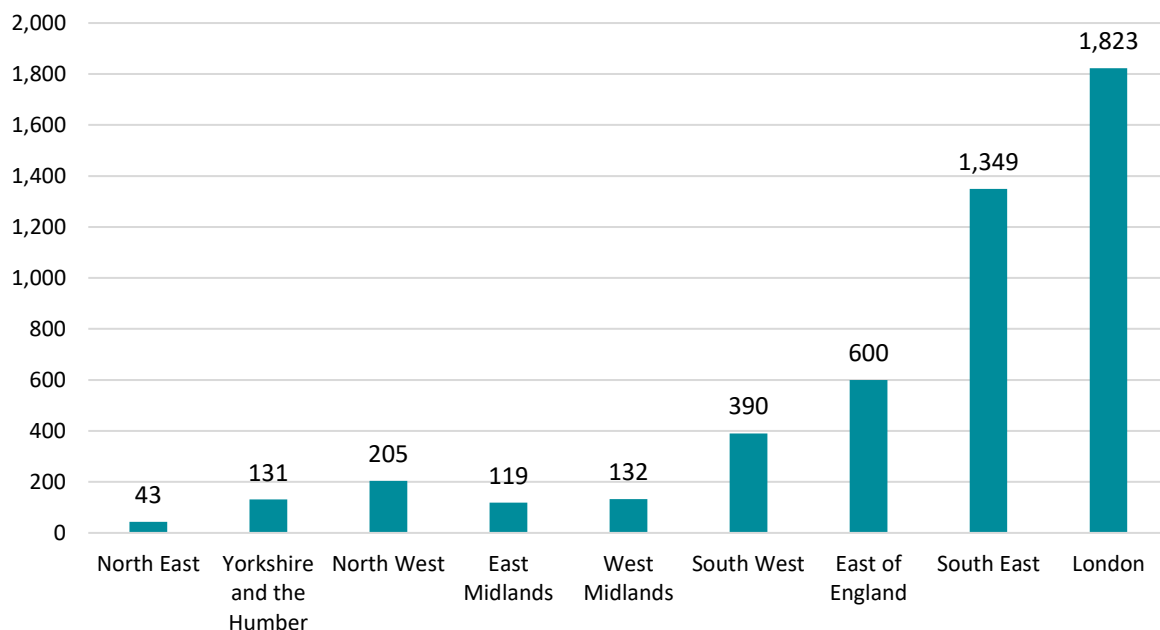


Source: Sage, Cebr analysis

Employment

Across England, we estimate that **almost 4,800 jobs** are directly generated through the management of more social homes. Figure 12 shows this employment impact by region.

Figure 12: Direct employment of managing increased social housing by region, number of jobs

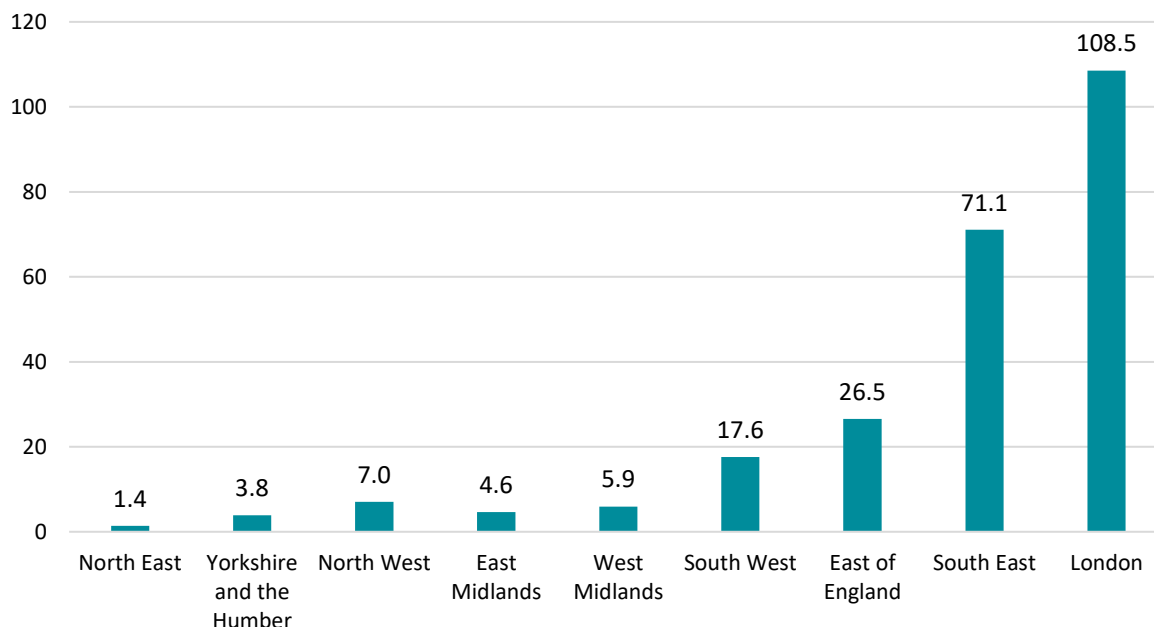


Source: NHF, ONS, Cebr analysis

Employee compensation

Lastly, we present the equivalent regional distribution for employee compensation. **The direct impact associated with this metric across England is £247m.**

Figure 13: Direct employee compensation of managing social housing by region, £m, 2023 prices



Source: NHF, ONS, Cebr analysis

2.3.2. Aggregate impacts

Next, we present the wider economic contribution made by the housing associations (HAs) and local councils who would manage the increased social housing. This captures the economic output directly generated, illustrated above, as well as the indirect and induced impact layers associated with it.

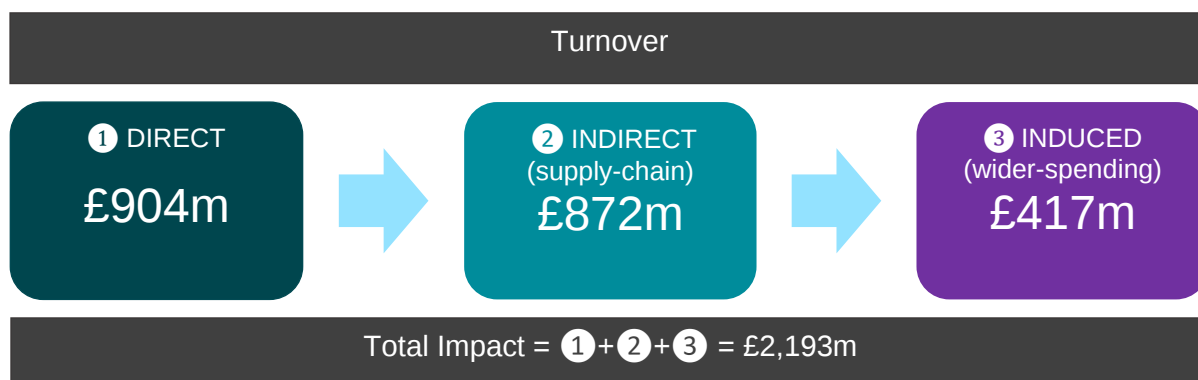
The results presented in this subsection should be interpreted in the same way as those from Section 2.2.2. The indirect impacts consider the economic contribution supported through the supply chain. The induced impact layer considers the economic activity supported when workers who receive income and employment benefits from the direct and indirect impact layers spend their earnings in the wider economy.

Turnover

Using our regional input-output models and the respective multipliers derived from this, we estimate that the direct turnover of £904m supports an additional £872m worth of turnover throughout the supply chains. Furthermore, when the HA and local council employees (and the employees along the supply chains) spend their earnings in the wider economy, this supports an estimated additional £417m.

If we combine these direct, indirect, and induced impact layers, **it is estimated that the day-to-day operations of managing more social homes support an aggregate (or total) footprint of £2.2bn in turnover across England.**

Figure 14: Turnover multiplier results for England



Source: NHF, ONS, Cebr analysis

As in Section 2.2.2, we can interpret the multiplier results above in an alternative way: for every £1 in turnover directly generated, a further £0.96 of turnover is supported along their supply chain. Furthermore, an additional £0.46 of turnover is supported when individuals associated with the direct and indirect impact layers spend their earnings in the wider economy. So, **for every £1 of turnover directly generated by the management of social housing, a further £1.43 worth of turnover is supported in the wider economy, producing an aggregate turnover multiplier of £2.43.**

Table 6: Regional aggregate turnover impacts, £m, 2023 prices

Turnover	Direct impacts	Indirect impacts	Induced impacts	Aggregate impacts
North East	5.2	2.8	1.6	9.7
Yorkshire and the Humber	14.1	11.2	5.8	31.1
North West	25.8	12.1	8.7	46.6
East Midlands	17.0	14.7	7.4	39.2
West Midlands	21.8	15.6	7.9	45.3
South West	64.6	57.5	28.3	150.4
East of England	97.2	83.2	40.4	220.8
South East	260.4	232.9	105.4	598.7
London	397.8	340.5	204.8	943.0
England	904.0	871.9	416.9	2,192.8

Source: NHF, ONS, Cebr analysis

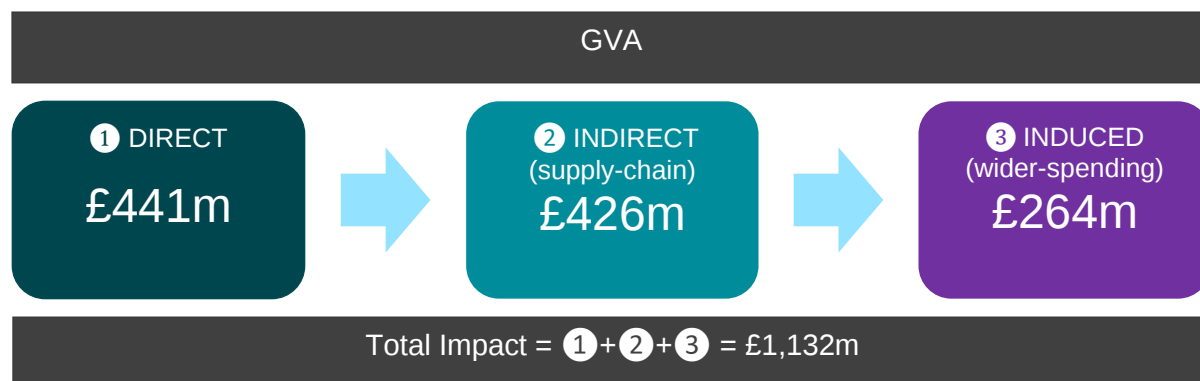
Table 6 above shows how this aggregate turnover impact is distributed throughout England. It's important to remember how multipliers should be interpreted at a regional level. As discussed in Section 2.1, the supply chain linkages between regions are only captured at the national level. This means that the regional aggregate figures do not sum to the aggregate impacts for England.

GVA

In terms of aggregate GVA, our modelling suggests that, in addition to the direct GVA of £441m, a further £426m worth of GVA contributions are supported along the supply chains (indirect effect). An additional £264m is supported when the employees from the direct and indirect impact layers spend their earnings in the wider economy. **Combining these three impact layers, we estimate that the management of 90,000 social homes would support an**

aggregate annual economic footprint of £1.1bn, as measured by GVA across England. As shown in Section 5, this would amount to a total of £20.8bn in net present value over 30 years.

Figure 15: Gross Value Added multiplier results for England



Source: NHF, ONS, Cebr analysis

Alternatively, this can be interpreted as: **for every £1 in GVA directly generated, a further £1.56 is supported through the indirect and induced impact channels, producing a total GVA multiplier of £2.56.**

We present the regional breakdown of the aggregate GVA impacts in Table 7 below.

Table 7: Regional aggregate GVA impacts, £m, 2023 prices

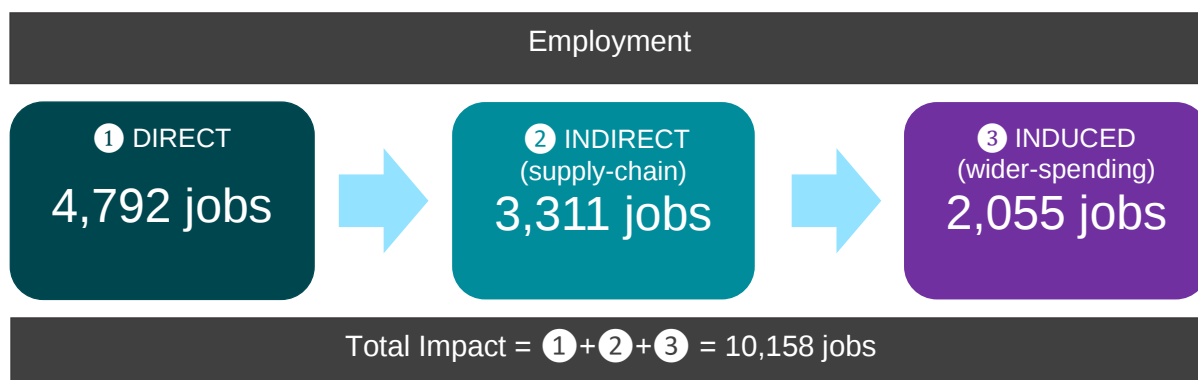
GVA	Direct impacts	Indirect impacts	Induced impacts	Aggregate impacts
North East	2.6	1.3	1.0	4.9
Yorkshire and the Humber	6.9	5.4	3.7	16.0
North West	12.6	5.9	5.5	24.0
East Midlands	8.3	7.0	4.7	20.1
West Midlands	10.6	7.4	5.0	23.1
South West	31.6	27.7	18.0	77.2
East of England	47.5	40.0	25.8	113.4
South East	127.2	113.4	67.4	307.9
London	194.2	167.3	132.9	494.4
England	441.4	426.4	264.3	1,132.2

Source: NHF, ONS, Cebr analysis

Employment

We can also consider the same outputs in terms of the employment footprint in England. Figure 16 below illustrates the employment multipliers and associated aggregate employment impacts for England.

Figure 16: Employment multiplier results for England



Source: NHF, ONS, Cebr analysis

For every job directly generated, a further 0.69 jobs are supported along the supply chain. Additionally, 0.43 jobs are supported when employees associated with the direct and indirect impact layers spend their earnings in the wider economy in England. This is equivalent to the following: **for every job directly generated, a further 1.12 jobs are supported in the wider economy in England.**

Table 8 illustrates the regional breakdown of the aggregate employment, as measured in terms of headcount.

Table 8: Regional aggregate employment impacts, number of jobs

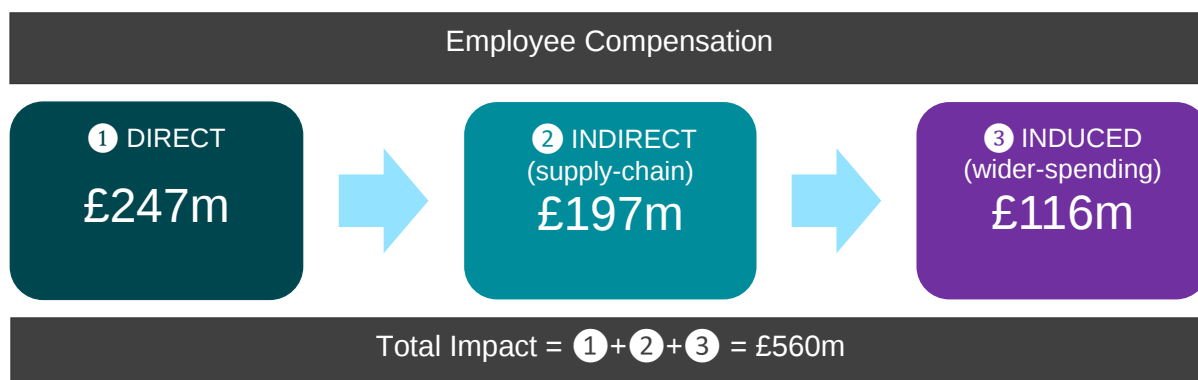
Employment	Direct impacts	Indirect impacts	Induced impacts	Aggregate impacts
North East	43	16	12	71
Yorkshire and the Humber	131	74	50	254
North West	205	69	64	337
East Midlands	119	72	49	240
West Midlands	132	67	45	244
South West	390	244	159	793
East of England	600	367	235	1,203
South East	1,349	863	512	2,725
London	1,823	1,107	882	3,811
Total	4,792	3,311	2,055	10,158

Source: NHF, ONS, Cebr analysis

Employee compensation

Finally, we consider the aggregate employee compensation which would be supported by the management of new social housing. **Managing 90,000 new social rent homes would result in an aggregate employee compensation of £560m.** Below we present the wider employee compensation impacts, broken down into the indirect and induced impact layers.

Figure 17: Employee compensation multiplier results for England



Source: NHF, ONS, Cebr analysis

This can be interpreted in the following way: **for every £1 in employee compensation directly generated, a further £0.80 of compensation is supported through the indirect impact channel (i.e., through the supply chain) and an additional £0.47 of compensation is supported through the induced impact channel.**

The regional breakdown of this aggregate employee compensation is shown in Table 9 below.

Table 9: Regional aggregate employee compensation impacts, £m, 2023 prices

Employee compensation	Direct impacts	Indirect impacts	Induced impacts	Aggregate impacts
North East	1.4	0.6	0.4	2.5
Yorkshire and the Humber	3.8	2.5	1.6	7.9
North West	7.0	2.7	2.4	12.2
East Midlands	4.6	3.2	2.1	9.9
West Midlands	5.9	3.4	2.2	11.5
South West	17.6	12.5	7.8	38.0
East of England	26.5	18.3	11.3	56.1
South East	71.1	51.6	29.3	152.0
London	108.5	75.1	57.2	240.9
England	246.7	197.1	116.1	559.9

Source: NHF, ONS, Cebr analysis

2.4 Social housing as a countervailing stabiliser in housing construction

In this section, we assess the evidence base for the notion that investment in social housing stabilises construction demand and preserves the economy's housebuilding capacity during economic downturns. It does this in three stages:

- (1) Demonstrating that housebuilding by the private sector is procyclical in that housebuilding activity moves with GDP growth with a lagged recovery time.
- (2) Assessing evidence consistent with the hypothesis that social housing acts as a stable source of demand for construction.
- (3) Assessing evidence that the introduction of 'cross-subsidy' of social housing from the private sector has reduced the capacity for social housebuilding to stabilise the industry.

Data on housebuilding in this section refers to housebuilding in England.

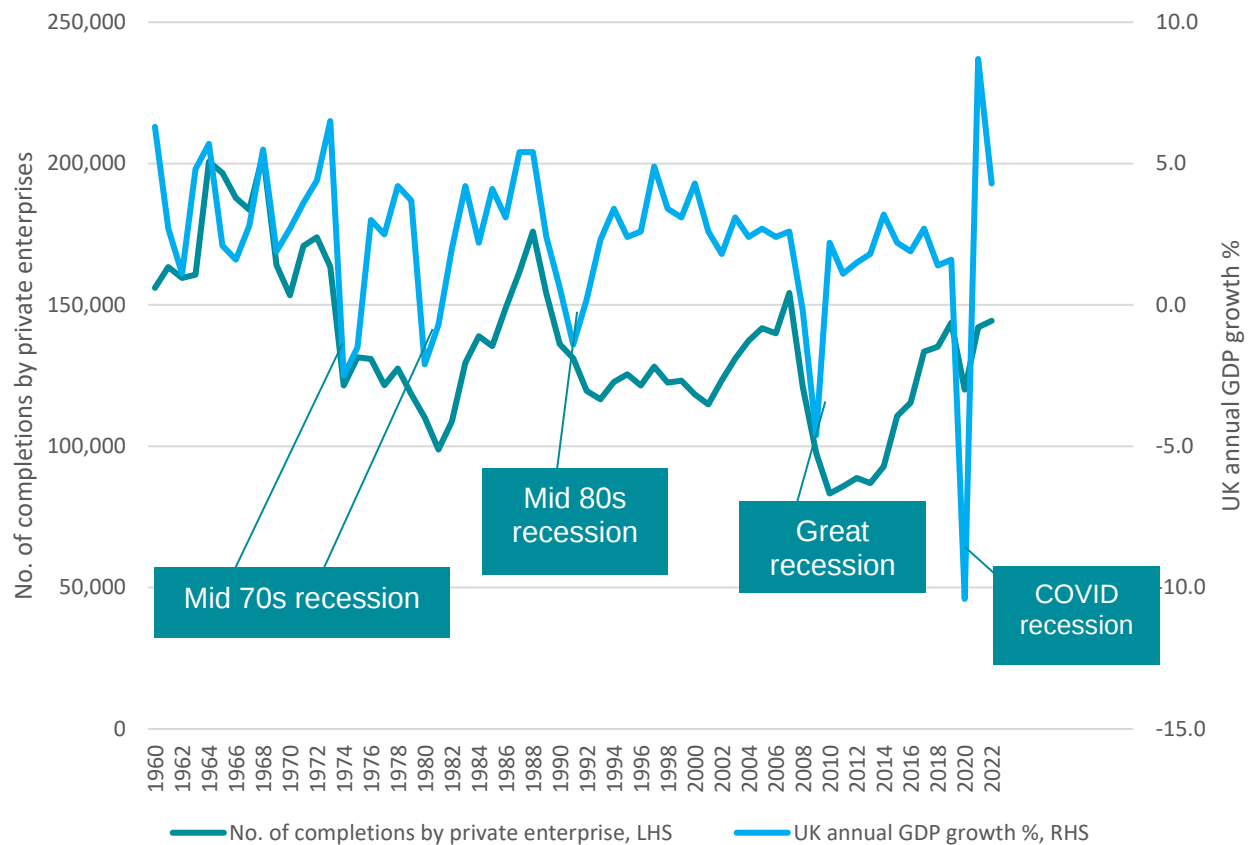
Housebuilding by the private sector in England is procyclical

Private housebuilding in England is procyclical in that housebuilding increases during periods of economic expansion (positive GDP growth) and decreases when the economy is contracting. This relationship is particularly stark in recessions. The last five major UK recessions have been accompanied by slowdowns in the new-builds by private enterprises.

Notably, there is a persistence in the housebuilding slowdowns relative to the faster recovery of GDP growth. This observation aligns with research carried out by Savills on behalf of Shelter ¹¹ that showed that housebuilding slowdowns have negative longer-term consequences for the capacity of the industry to build in the future.

¹¹ [Impact of Covid-19 on social housing supply and residential construction](#) | Savills Research Report for Shelter (2020)

Figure 18: GDP growth and private-sector new-builds time series

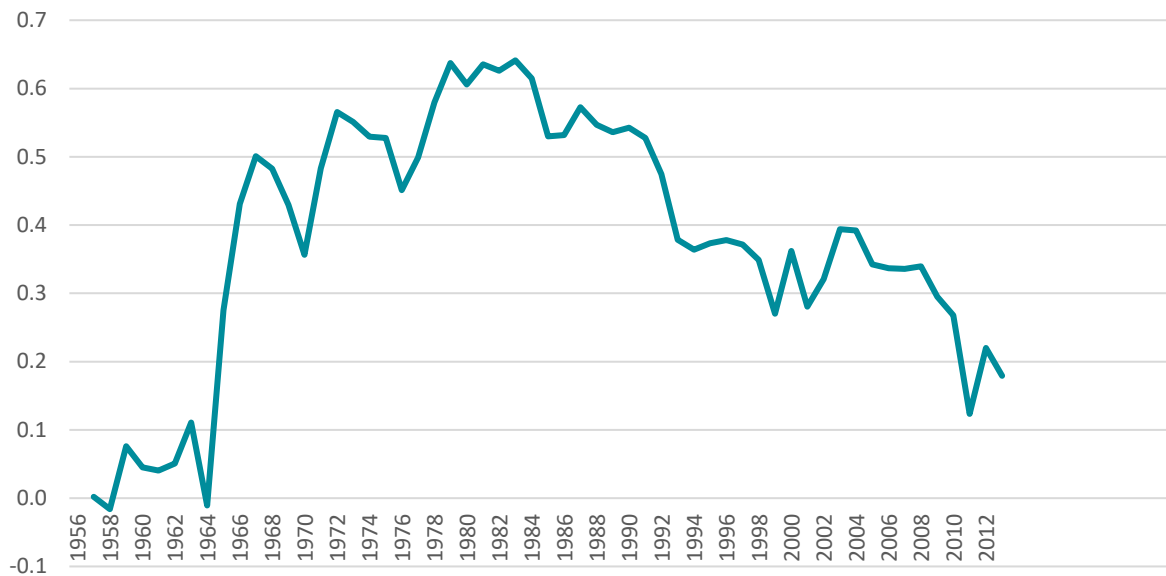


Source: ONS Housing supply, ONS GDP

This narrative can be complemented by using a rolling 20-year correlation coefficient. This statistic measures the correlation, or co-movement, of the private sector new-builds in England and UK GDP growth in a rolling 20-year period. The correlation coefficient lies within a $[-1, 1]$ range. A correlation coefficient of one implies perfect co-movement, while a correlation coefficient of minus one implies perfect inverse movement.

As Figure 20 shows, the coefficient is usually positive over the period of data availability, which is evidence for the general procyclicality of private housebuilding. Over the period 1970-1990, the data suggests positive co-movement, with a coefficient of 0.6 for 1980. Since the coefficient is broadly positive it indicates that private housebuilding was indeed typically procyclical over the period.

Figure 19: 20-year rolling GDP growth and private sector new-build correlation coefficient

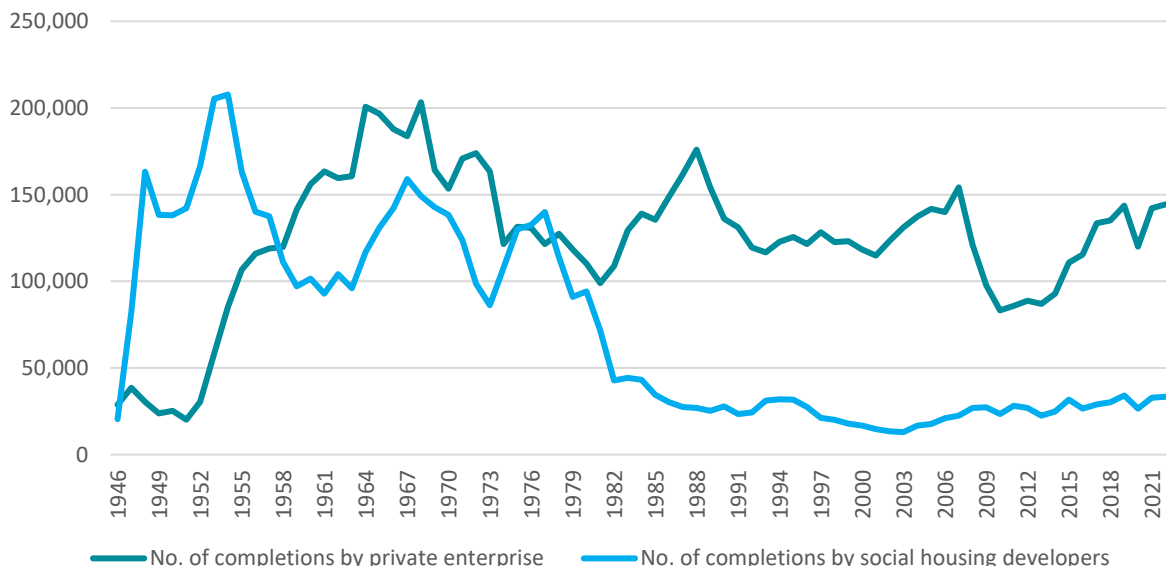


Source: Cebr Analysis, ONS Housing supply, ONS GDP

Social housing can protect the construction industry from volatility

Since the 1980s, social housing new-builds have been a stable source of demand for the construction industry. Social housing can act as a countervailing force, shielding the wider industry from market volatility to some extent. This contrasts with the procyclical volatility seen in private sector new-builds.

Figure 20: Annual new-builds time series by developer type



Source: ONS Housing Supply

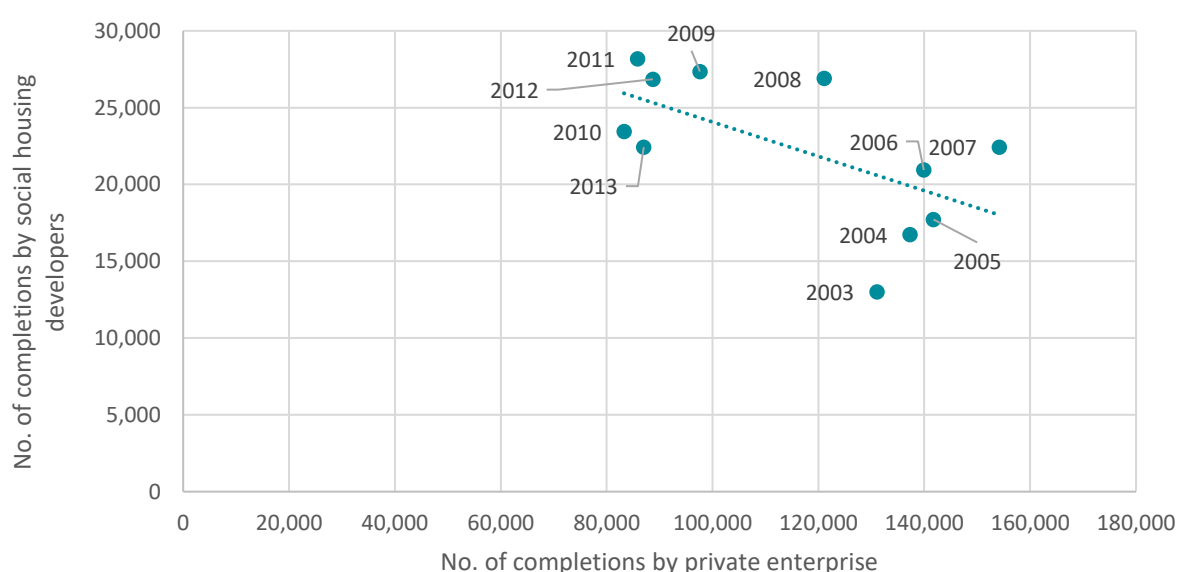
Our analysis finds that social housing new-builds supported total housebuilding during the private sector slowdown induced by the Great Recession of 2008. This is seen in the negative correlation between social housing new-builds and private sector new-builds over the period,

meaning that the two variables moved in opposite directions. Even as private sector new-builds dropped, the rate of social housing new-builds increased.

So, the evidence suggests that social housing acted as a countervailing stabiliser in the aftermath of the Great Recession of 2008. Not only were more social houses built in periods of economic hardship, but also that this cushioned the private sector demand drop faced by the construction industry. The Savills and Shelter report identified this as an important mechanism that protects housebuilding capacity, enabling a stronger recovery from economic downturns.¹²

The effect of social housebuilding to stabilise the wider sector can be anecdotally corroborated by a statement from an ex-senior civil servant that “demand from the social sector stood between the housebuilding sector and near-oblivion” during the Great Recession of 2008.¹³

Figure 21: Private sector vs social housing new-builds in a 10-year period around 2008



Source: Cebr Analysis, ONS Housing Supply

Evidence that cross-subsidy may have threatened this dynamic

Since 2011, funding for new social housing has become increasingly reliant on a cross-subsidy model because of a cut in capital subsidy of more than 60%.¹⁴ This has threatened the stabilising effect of social house building. In response, housing associations have made up the shortfall through a combination of higher levels of borrowing, cross-subsidy from homes built for market sale and rent, and using up existing financial capacity. Notably, this exposes social housebuilding to the same cyclical pressures as the private sector.

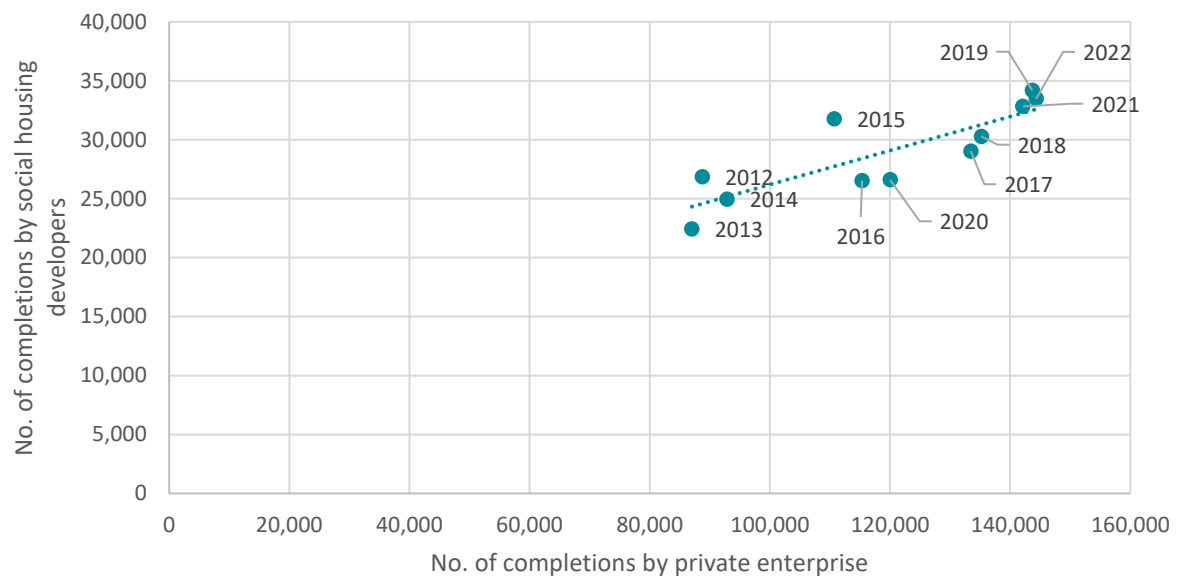
Our analysis sees this borne out in the data. Social housebuilding begins to correlate with private-sector new-builds, undermining its ability to provide a countervailing stabilising force to the wider industry. This is consistent with the hypothesis that moving away from grant funding to a cross-subsidy model makes housebuilding less resilient to economic downturns.

¹² [Impact of Covid-19 on social housing supply and residential construction](#) | Savills Research Report for Shelter (2020)

¹³ [Can housing associations keep building as the rest of the market slows?](#) | Building.co.uk

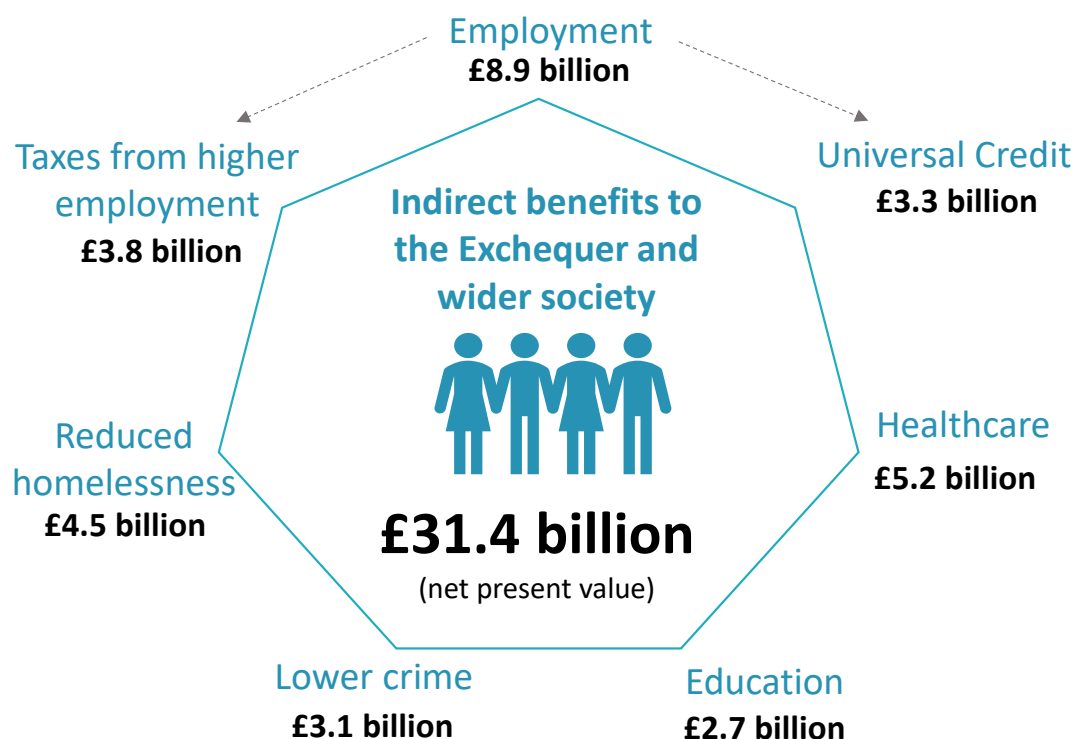
¹⁴ [Increasing social housing supply](#) | Parliamentary Inquiry

Figure 22: Private sector vs social housing new-builds in 2012-2022



Source: Cebr Analysis, ONS Housing Supply

3. Indirect benefits to the Exchequer and wider society



Note: figures may not add up due to rounding

Social rented housing, with rents tied to local incomes, is the most affordable housing tenure. It is also more stable than the private rented sector, as people in social housing usually have secure tenancies, giving them stronger rights and greater protection from eviction. Social homes also tend to be better quality than both private rented and owner-occupied housing. This stable and quality foundation leads to numerous benefits for tenants and wider society, which often translate to fiscal benefits for the Exchequer.

3.1 Methodology

The figures derived as part of this analysis are based on two previously published pieces of research:

1. Cebr's research for Centrepont assessing the costs of youth homelessness.¹⁵
2. The Hyde Group's research evaluating the social benefit of their social housing provision.¹⁶

¹⁵ [The Cost of Youth Homelessness](#) | Centrepont (2023)

¹⁶ [The Value of a Social Tenancy](#) | The Hyde Group (2018)

The methodology of both pieces of research centres on a 'counterfactual' examination. This entails modelling the life path of a specific group in the absence of a particular condition or intervention. Then, this trajectory is compared to the scenario in which the condition or intervention is applied.

In the Hyde Group analysis, this means looking at a scenario where the Hyde Group does not provide social housing. Similarly, in the Centrepont analysis, the focus was initially on mitigating homelessness for vulnerable youths. However, we have adjusted the data to shift the focus from young homeless people to the broader demographic of those moving into social housing.

Our analysis assumes that the observed differences in outcomes between those not currently in social housing (but potentially eligible, proxied by the profile of those who moved into social housing in 2021/22 as per CORE data) and those in social housing primarily result from the greater availability of such social homes.

We also assume a uniform distribution of residents across the 90,000 residences throughout the 30-year duration, considering both inflows and outflows. Despite potential changes in tenancy during this period, we expect the demographic attributes of individuals entering social housing to remain consistent.

To accurately account for the 30-year timeline, we adjusted the annual nominal benefits associated with each component with a discount factor of 3.5% to calculate the net present value of benefits, aligned with the Green Book's recommendation.

While we refer to 'Wider benefits to society' in this section, these benefits will be realised by various stakeholders (including individuals, public services, and the Exchequer). Where data from the Hyde Group was used, such as the lower crime and education elements, disentangling the specific stakeholder who will benefit has not always been possible. Although certain benefits unquestionably fall under the category of 'indirect benefits to the Exchequer,' some are less clear-cut. Consequently, the 'indirect benefits to the Exchequer' figure posed currently should be regarded as a conservative estimate.

Labour market benefits

Our analysis focuses on working-age individuals who face challenges accessing social housing. We compare scenarios where access to social housing improves employment prospects with counterfactual situations where individuals face prolonged housing challenges. This comparative approach allows us to estimate the potential impact of social housing on employment probability.

We focus on working-age individuals employed before entering social housing (based on CORE data) and consider the employment rate among those in social housing tenures, from the English Housing Survey. We also examine three main scenarios: a single year without social housing, two years without social housing, and three years without social housing.

We model the potential economic gain associated with each scenario. This is done by using data on the median worker salary for each age range and applying an average ratio of GVA to compensation of employees (COE) figures.

Furthermore, we explore the longer-term effects of inactive/unemployed working-age adults, resulting in a lag in productivity due to skills gaps. Our scenarios project this cohort lagging in productivity equivalent to the years spent out of work.

For instance, in a five-year unemployment scenario, a 39-year-old worker would produce the same as a 34-year-old who has not experienced homelessness. This approach helps assess not only the short-term cost of foregone economic output but also the long-term impact of the initial unemployed period.

Decrease in Universal Credit claims

Higher employment reduces dependency on welfare by providing individuals with earned income, lowering the likelihood of Universal Credit (UC) claims. Our estimates on UC expenditure thus build on our labour market benefits analysis above.

Initially, we segment the cohort of households eligible for social housing based on age and household type, using data from the CORE database. We then assign a UC allowance to each household based on these characteristics, using figures from the government's guidelines.

Comparing this cohort with households already in social housing, we focus on the difference in the employment shares for each representative household. We assume that in a counterfactual scenario where the lead household reference person is in social housing, they would exhibit characteristics similar to those already in social housing. This comparison allows us to estimate how the provision of 90,000 new social homes could benefit HM Treasury in terms of reduced UC claims.

We explored ways to include the effect of employed individuals who still meet UC eligibility criteria. Transitioning to social housing could offer an avenue to enhance their income, reducing reliance on UC. Mapping this phenomenon is challenging due to limited granular wage-related data. So, our estimates on savings from a drop in UC claims are conservative, likely understating the true benefit of additional social housing.

Reduced cost of homelessness

Building 90,000 social homes would reduce the number of homeless individuals and those in temporary accommodation, resulting in cost savings for local authorities who provide and administer homelessness services.

To quantify these savings, we investigate the Department for Levelling Up, Housing, and Communities' (DLUHC) outturn data, specifically local authority expenditure related to housing services. The detailed demographic breakdown from CORE data, categorised by homelessness condition and previous housing situation, guides our estimation of potential cost savings. We focus on two distinct channels: reduced administration costs for homelessness services and lower expenses related to temporary accommodation.

Although there is overlap between these channels, it is important to analyse them separately to precisely assess the actual cost savings from homelessness reduction. For each channel, the estimation of cost savings involves a scaling exercise, where we examine the proportion of individuals moving into social housing relative to the total caseload. Data on overall caseloads in England is from the Department for Levelling Up, Housing, and Communities' (DLUHC) tables on homelessness.

Given that the data on individuals in temporary accommodation is a snapshot at a specific point in time, it is supplemented using dynamic flows based on the DLUHC's flow analysis. The latter provides an overview of the flows of households initially assessed as owed a duty based on all cases within a financial year. This gives an estimate of the total caseload of those in temporary accommodation throughout 2022/23. Subsequently, we scale the expenditure figures for each channel based on their respective shares (assuming a uniform distribution of expenditure across all households) and aggregate the resulting cost savings.

Fewer disruptions to education

We consider the impact of unstable housing situations on the education of young people and assess the potential advantages of a more stable living environment provided by social homes.

Cebr's analysis for Centrepont, while comprehensive, did not cover the advantages associated with minimising disruptions caused by youth homelessness. To address this gap, we build on the Hyde Group's foundational figures. We examine the benefits linked to reduced disruptions in social housing for a projected cohort of children set to live in the new 90,000 social homes. Using CORE data, we estimate the percentage of school-age children expected to transition into social housing.

The Hyde Group's analysis reveals a noteworthy cost associated with children being out of education – approximately £10,000 per child per year, extended over the eight years of mainstream schooling post-seven years of age.¹⁷ To estimate the long-term impact of disruptions to mandatory schooling due to insufficient social housing, we segment the cohort of children aged 0 to 15. We then calculate the remaining years of mandatory schooling for each age and apply unit costs specified in the Hyde Group's report.

Benefits from lower crime

To assess this impact, we rely on research by the Hyde Group due to limited data on offending rates and the absence of crime data in the CORE database. Unfortunately, comparing different offending rates and estimating the benefits of reduced crime, as in our examination of the costs of youth homelessness, is not feasible.

The Hyde Group's research focuses on the cost of being a victim and reduced police callouts, emphasising that individuals in their sample mostly experience victimhood. However, this observation may not entirely apply to the broader group expected to move into social housing. Relying on the Hyde Group's figures assumes alignment between the analysed cohort and the broader group.

Savings to health services

Our analysis of the effects on public health services, similar to our examination of reduced crime rates, relies on insights from the Hyde Group. This decision is driven by limitations in

¹⁷ The data presented by the Hyde Group concerning disrupted education encompasses reduced earning capacity, impacts on public services, and expenses associated with anti-social behaviour and increased crime rates. The stated unit cost of around £10,000 per child annually does not account for the expenses incurred when a child is completely disengaged from education. Instead, it reflects a range of scenarios derived from their sample, which is more reflective of cohort characteristics.

data granularity on the use of health services and the absence of relevant data in the CORE dataset.

The aspects covered in the Hyde Group's analysis include reduced use of NHS services (such as GP attendance, A&E visits, and substance misuse). These align closely with elements explored in Cebr's research for Centrepont. Moreover, the Hyde Group's study goes beyond Centrepont's scope, addressing issues like falls among the elderly and various health conditions linked to inadequate housing such as respiratory illnesses. We are confident that the Hyde Group's estimates provide a robust indication of the health service benefits resulting from enhanced social housing provision.

3.2 Overall socioeconomic benefits

Table 10: Breakdown of wider socioeconomic benefits by type

Benefit type	Annual benefit per-household	Annual benefits, nominal (£ million)	Total cumulative benefits, present value (£ million)
Labour market benefits	£3,290	£296*	£8,882
Increase in tax receipts	£1,405	£126*	£3,793
Decrease in Universal Credit claims	£1,218	£179	£3,289
Savings to health services	£1,914	£281	£5,170
Reduced homelessness services expenditure	£1,671	£245	£4,512
Savings from lower crime	£1,133	£166	£3,058
Fewer disruptions to education	£1,003	£147	£2,709
Total:	£11,634	£1,441	£31,413

*The approach for assessing these benefits involves converting inputs to present value at the outset, rendering nominal figures unavailable. Therefore, these are net present value figures averaged across 30 years.

Sources: The Hyde Group, DLUHC, English Housing Survey, Annual Business Survey, MHCLG, ASHE, Cebr analysis

3.3 Labour market benefits



Social housing offers stability often absent in the private rented sector and could yield substantial economic benefits through higher employment and productivity.

The cumulative value of labour market benefits from building 90,000 social homes is estimated at £8.9 billion. A further benefit of £3.8 billion is available to the Exchequer through increased tax revenue.

Social housing provides a greater level of stability and security than the private rented sector.¹⁸ People living in stable, quality homes are more likely to be able to find and keep jobs. They are also more likely to be productive while at work. Conversely, insecure tenancies, frequent moves and poor conditions (all of which are more common in the PRS) harm people's work. Moving people from the PRS and temporary accommodation into social housing will therefore lead to labour market benefits.

Our assessment of these benefits focus on the increase in economic output resulting from higher employment, considering both immediate gains and longer-term productivity impacts.

We estimate that the **increased employment resulting from social housing contributes on average £3,290 per household** per year to economic output. This leads to a **cumulative impact of £8.9 billion** in present value over 30 years.

Furthermore, increased employment and productivity are projected to yield tax revenue (specifically income tax and National Insurance contributions) to the Exchequer. We anticipate a resulting increase in **annual tax revenue of £1,405 per household**. Summing this up over a 30-year period yields a **cumulative benefit of £3.8 billion** in present value to the Exchequer.

3.4 Decrease in Universal Credit claims



Building 90,000 new social homes could cut yearly Universal Credit claims by £1,218 per household. This adds up to a saving of £3.3 billion for the government over the long term.

Higher employment resulting from stable and good-quality social housing would reduce dependency on welfare. People with earned income are less likely to make UC claims.

Our estimates indicate that providing 90,000 new social homes could reduce annual UC claims by £1,218 per household. This translates to cumulative savings of £3.3 billion for the Exchequer over 30 years.

¹⁸ [Home for Good: The role of social housing in ending rough sleeping](#) | St. Mungo's

3.5 Savings to health services



Social housing can lower health risks and reduce the demand for healthcare services. 90,000 new social homes could lead to cost savings of £5.2 billion for the NHS.

Social housing provides better-quality living conditions compared to private accommodation and can reduce the risk of harm from issues like damp or trip hazards.¹⁹ This means individuals living in social housing may experience fewer health problems, leading to a decreased need for healthcare services and, consequently, cost savings for the NHS.

Our analysis of the effects on public health services relies on insights from research by the Hyde Group. The research considers reduced use of NHS services (such as GP attendance, A&E visits, and substance misuse) while addressing issues like falls among the elderly and health conditions linked to inadequate housing conditions such as respiratory illness.

Building 90,000 new social homes could lead to a **substantial reduction in annual health services usage of £1,914 per household**, resulting in cumulative savings of **£5.2 billion for the NHS** over 30 years.

3.6 Reduced homelessness services expenditure



Building 90,000 social homes would reduce the number of people living in temporary accommodation and requiring homelessness assistance. This would lead to savings of £4.5 billion for local authorities over the long term.

Building more social homes would reduce the number of people who are homeless and those living in temporary accommodation, resulting in cost savings for local authorities who provide and administer homelessness services. Notably, 17% of households transitioning to social housing, as per CORE data, were formally classified as statutory homeless. Within the broader cohort, 14% originated from temporary accommodation.

We estimate that 90,000 new social homes would reduce local authorities' **annual spending on homelessness services by £245 million every year**. This represents a tenth (10%) of total expenditure by English local authorities on homelessness services (£2.5 billion) in 2022/23. The main factor contributing to the total is the allocation and management of temporary housing. This accounts for £219 million, 12% of the overall expenditure by English local authorities on addressing homelessness in 2022/23.

¹⁹ [Housing conditions in the private rented sector \(England\)](#) | House of Commons Library

Over the long term, this would translate to **cumulative cost savings of £4.5 billion**. The majority of savings, notably £4.0 billion, are attributed to a reduction in the cost of temporary accommodation while administrative expenses (£493 million) make up the remainder.

3.7 Savings from lower crime



Inadequate housing increases individuals' vulnerability to crime, resulting in substantial costs in terms of resources (property damage, impact on physical and mental health) and public finances (expenses related to law enforcement and the criminal justice system). Our analysis reveals a cumulative benefit of £3.1 billion from lower crime due to the construction of 90,000 social homes.

Here we rely on research by the Hyde Group on the lower likelihood of being a victim and calling the police for social housing tenants. The research argues that tenants in a crisis are more likely to be the victims of crime and therefore we see reduced costs to both public services, such as to police services through callouts, and resources, including that of personal property.

Our findings suggest that constructing 90,000 new social homes could lead to an annual **reduction of £1,133 in crime-related costs for the average household, accumulating to £3.1 billion in present value over 30 years.**

3.8 Fewer disruptions to education



Insecure housing adversely affects children's wellbeing, impacting their education through absenteeism, sleep problems, and academic stress. Our study suggests that introducing 90,000 new social homes could save £2.7 billion, by reducing the number of children who end up not in employment, education or training (NEET).

A large proportion, around 30%, of individuals moving into social housing in 2021/22 were aged 0 to 15. Insecure housing and homelessness negatively affects children's mental and physical wellbeing, leading to school absenteeism and poor educational outcomes.²⁰ Additionally, overcrowded and substandard homes contribute to issues such as sleep deprivation, academic failure, and stress, as highlighted in previous research by Shelter. This research points out challenges like missed school days, long commutes, limited space for homework, and mental health issues that disrupt children's education.²¹

²⁰ [The impact of homelessness on a child's education](#) | Shelter (2020); [Housing: an Under-Explored Influence on Children's Well-Being and Becoming](#) | Clair (2018)

²¹ [Relations between housing characteristics and the well-being of low-income children and adolescents](#) | Coley et al. (2012); [Still Living in Limbo](#) | Shelter (2023)

Here we consider the impact of insecure and poor-quality housing on young people's education. Such scenarios increase the chances of a child becoming NEET, which accrue significant resource and public finance costs. Accordingly, we assess the potential advantages of offering stable social homes.

90,000 new social homes could reduce the yearly costs associated with disruptions in children's education by £1,003 per household. Over a 30-year horizon, this represents a cumulative saving of £2.7 billion in present value.

3.9 Evaluating the impact of new social housing on labour market mobility

In addition to the outlined socioeconomic advantages, the potential of social housing to enhance labour market mobility has become a crucial area of interest. Our investigation did not measure this, as there is a lack of existing quantifiable evidence to draw from. Nevertheless, recognising the extensive literature on this subject, we have qualitatively assessed its potential benefits.

The core proposition is that facilitating access to social housing near job opportunities increases individuals' mobility within the labour market. This in turn fosters a more dynamic and inclusive economic environment.

A seminal contribution to this discourse comes from Hsieh and Moretti (2019). Their study argues that constraints on new housing supply in major US cities have impeded workers from relocating to urban centres with higher productivity and wages.²² This inability to move to urban areas lowered aggregate US GDP by more than a third (36%). The authors propose that policies addressing these housing supply constraints could be pivotal in unlocking economic growth and enhancing labour market efficiency.

Expanding on this, Maclennan et al. investigate the specific role of affordable and well-maintained housing (comparable to social housing) in facilitating labour market mobility in Australia.²³ Their research suggests that affordable housing can reduce commuting times and costs for low-income workers, bringing them closer to job opportunities. This proximity positively influences labour market matching opportunities, indicating that social housing can enhance overall labour force mobility.

Examining the relationship between housing and labour market mobility during economic crises offers key insights. Palomares-Linares and van Ham's research in Spain highlights a shift towards homeownership during economic downturns, underscoring its increased importance in influencing internal migration.²⁴ While this study explores the stability derived from homeownership in general, similar advantages are offered by permanent social housing.

²² [Housing Constraints and Spatial Misallocation](#) | Hsieh and Moretti (2019)

²³ [Housing and Productivity: all or nothing at all](#) | Maclennan et al. (2018)

²⁴ [Understanding the effects of homeownership and regional unemployment levels on internal migration during the economic crisis in Spain](#) | Palomares-Linares and van Ham (2018)

Such housing provides people with a stable foundation and the ability to withstand economic uncertainties. During volatile economic periods marked by elevated interest rates and escalating mortgage burdens, social housing emerges as a more secure and resilient option, particularly for households struggling to pay higher mortgage repayments. Consequently, social housing facilitates the movement and retention of residents in areas they might otherwise be unable to afford, particularly during periods of constrained financial conditions.

Nevertheless, several papers cast doubt on the original hypothesis that affordable housing uniformly promotes labour mobility. Instead, these studies reveal nuanced interactions between housing markets and labour movements. Research on immigration patterns in Germany and the impact of the housing market on internal migration in Spain suggests that factors beyond housing affordability, such as social networks and regional unemployment levels, also influence labour mobility ^{25,26}.

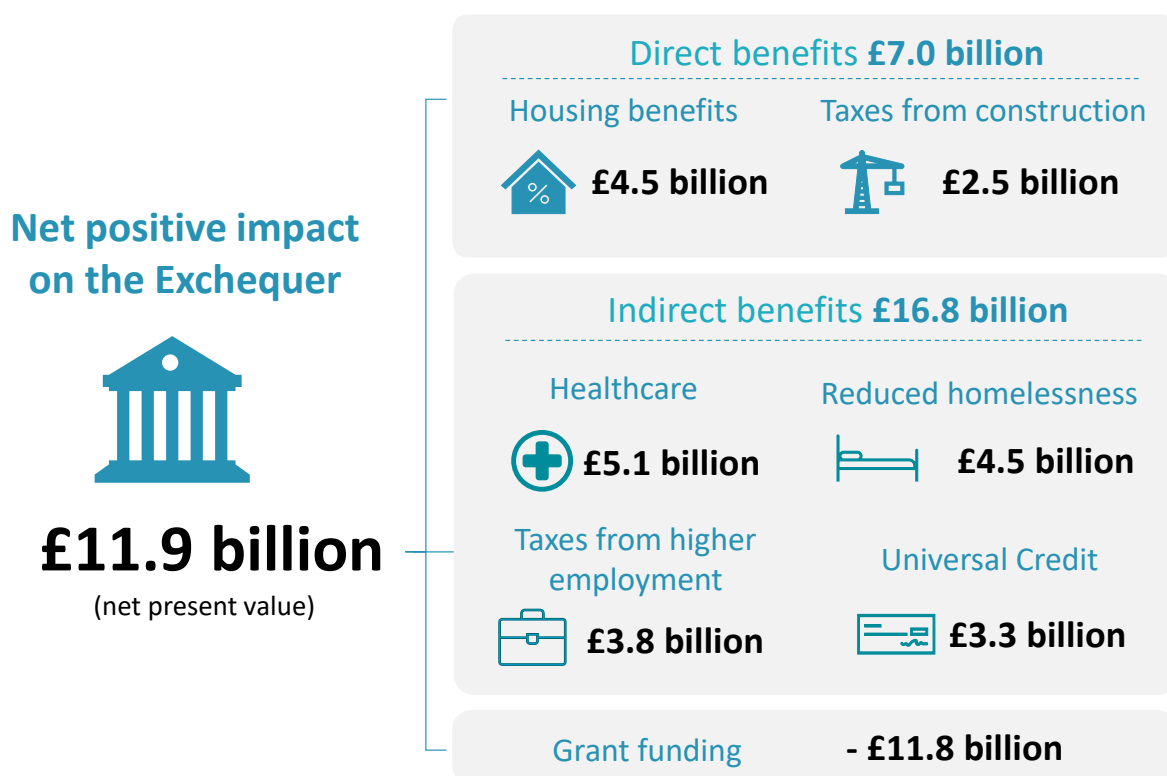
These insights indicate that a straightforward correlation between affordable housing and increased labour mobility may not hold under the complex dynamics of the broader socioeconomic sphere. A more comprehensive understanding of the multifaceted influences on residential and employment choices is needed.

In conclusion, while substantial evidence supports the hypothesis that providing social housing closer to employment opportunities can enhance labour market mobility, the relationship is intricate and multifaceted. Policy interventions in this domain need careful design, considering not only the location and availability of social housing but also the broader socioeconomic context.

²⁵ *ibid*

²⁶ [Regional distribution and location choices of immigrants in Germany](#) | Tanis (2018)

4. Overall impact on the Exchequer



Note: figures may not add up due to rounding

4.1 Methodology

To estimate the potential cost savings to the Exchequer from moving households on benefits from PRS into social housing, we assume that the 90,000 homes would be categorised as social rent homes. The rent for these homes is typically far lower than equivalent market rents.²⁷

Recognising that not all the social homes will be occupied by tenants transitioning from the PRS, we account for movements within the existing social rented sector (SRS). Each year, tenants within the SRS relocate to other social homes, mostly freeing up their prior residences.

However, certain moves, typically around 2.8% of cases, do not lead to the release of their last social homes. We derive this percentage from an analysis by the NHF of relocation motives based on data published by the Department for Levelling Up, Housing, and Communities (DLUHC). Instances include permanent decanting due to property earmarking for demolition, relationship breakdown (where the other partner remains in the previous home), and cases where residents were asked to vacate by family or friends. Consequently, our analysis assumes that approximately 97.2% of the 90,000 social homes would ultimately be available to households currently in the PRS.

²⁷ Rents for properties let at 'social rent' are based on a formula set by government. This creates a 'formula rent' for each property, which is calculated based on the relative value of the property, relative local income levels, and the size of the property.

We also estimate the number of households in these new social homes that receive housing support payments, including both housing benefits and the housing element of Universal Credit. The Continuous Recording (CORE) database by DLUHC shows that, on average, 75% of households contracting new social lettings receive benefits.²⁸ By applying these proportions, we estimate that 65,292 of the 90,000 households would originate from the PRS and would be receiving lower benefits. We apply a regional distribution to these homes mirroring the projected distribution of the 90,000 homes in Section 2.

To compare the level of support between the PRS and the social rented sector, we use figures provided by the NHF based on their analysis of the English Housing Survey²⁹. These figures show the average weekly benefits in each sector by region. We extrapolate the difference in the weekly support awarded in each region over the whole year to estimate the annual savings to the Exchequer from moving a claimant from the PRS to social rent.

4.2 Savings on benefits from tenure shifts

The government subsidises the housing costs of those on low incomes by helping them pay their rent through the benefits system. In this section, we evaluate potential savings to the Exchequer on housing benefits by shifting households to the social rented sector through the construction of 90,000 social homes.

Given the scarcity of social housing in England, a growing number of low-income households are forced to live in the PRS. Over the past 3 years, the number of claimants for housing support payments³⁰ in the social rented sector increased by 7%, while those in the PRS saw a greater rise of 20%.³¹ Not only is the number of claimants higher in the PRS, but the higher rents in this sector also increase benefit requirements compared to the social rents.

- There is significant variation in the annual savings per household across regions, ranging from £807 in the North East to £5,315 in London.
- Overall, we estimate that the tenure shifts from the PRS could lead to **direct savings of £243.8 million** to the Exchequer every year.
- Over 30 years, the government would **save a total of £4.5 billion on housing benefits** in present value from the 90,000 social homes alone.³²

The breakdown of the annual savings to the Exchequer by region is shown in **Error! Reference source not found.** below.

²⁸ Average 2019/20 – 2021/22.

²⁹ Based on payments in 2021. Scaled up to 2023 prices by applying increase in HB from 2021 to 2023.

³⁰ The government supports low-income households in paying their rent either through housing benefits (HB) or through the housing element of Universal Credit. These benefits are available to people in both the private and social rented sectors.

³¹ Includes housing benefits and housing element of Universal Credit. DWP Autumn Statement 2023 Expenditure and Caseload forecast.

³² Assuming a discount rate of 3.5% as per the Green Book recommendation and that the impacts are consistent annually over the assessed period.

Table 11: Annual savings to the Exchequer from projected tenure shifts by region

Region	Social rent homes	Households from PRS on benefits	Annual savings on benefits per household (£)	Total annual savings (£)
North East	1,000	725	807	584,859
North West	4,000	2,902	1,905	5,527,236
Yorkshire and The Humber	2,000	1,451	860	1,247,750
East Midlands	2,000	1,451	855	1,240,808
West Midlands	3,000	2,176	1,188	2,585,580
East of England	11,000	7,980	2,227	17,771,077
London	33,000	23,941	5,315	127,246,990
South East	26,000	18,862	4,148	78,245,725
South West	8,000	5,804	1,616	9,381,551
England	90,000	65,292		243,831,575

Sources: DLUHC, English Housing Survey, DWP, NHF, Cebr analysis

4.3 Tax revenue from construction

Another direct benefit is that the increased economic activity in the construction sector is projected to yield additional tax receipts for the Exchequer. Our analysis indicates that for every £100 of output generated in the construction industry, the government receives approximately £7 in tax revenue across VAT, Corporation Tax, Income Tax, and National Insurance contributions.³³ We therefore estimate the **total tax revenue directly generated from the construction of the social homes to be £2.5 billion.**

4.4 Indirect impacts

As highlighted in Section 3, several indirect socioeconomic impacts contribute to fiscal benefits for the Exchequer. These include:

- £5.2 billion in healthcare service savings by the NHS
- £4.5 billion in reduced spending on temporary accommodation and homelessness services

³³ We use the tax receipts-to-output ratio in the construction industry for each tax head to estimate this. VAT and Corporation Tax statistics by sector are provided by HMRC, while our in-house income tax model estimates Income Tax and NICs for the construction industry. This considers average employee pay and job numbers supported during the construction of the 90,000 social homes. These tax heads have been identified as the most relevant for the construction industry, and generally account for around 75% of the total tax revenue to the central government.

- £3.8 billion in increased tax revenue from higher employment and productivity
- £3.3 billion in decreased Universal Credit claims

Summing these figures, we estimate the **total indirect benefits to the Exchequer at £16.8 billion.**

The benefits from lower crime and improved education are not included in this calculation. We use an extension of the Hyde Group's methodology for estimating these benefits and, as a result, lack visibility on the proportion attributable to the Exchequer. Therefore, the above figure of £16.8 billion for indirect benefits should be regarded as a conservative estimate.

4.5 Overall impact on the Exchequer



The overall impact on the Exchequer is estimated to be positive, with a net long-term benefit of £11.9 billion.

In terms of costs to the Exchequer, as discussed in Section **The economic impact of building 90,000 social homes**², the construction of 90,000 social rent homes would need government support in the form of grant funding, which is estimated at £11.8 billion.

However, this figure is based on the findings of a 2019 NHF report³⁴ which assumes that a portion of the homes will not require grant funding, as they are funded through Section 106—a form of planning gain. While our analysis assumes no further planning interventions, this could be subject to changes as **there is a possibility of enhancing or restructuring this system to extract more value and therefore reduce the capital grant needed.**

In terms of benefits, combining the direct and indirect benefits described in the previous sections results in **total benefits of £23.7 billion for the Exchequer**, which is twice the estimated grant required to fund the programme. Overall, the long-term net impact for the Exchequer of funding 90,000 social homes is expected to be positive, with a **net benefit of £11.9 billion.**

In terms of timing, the project is anticipated to reach a break-even point from the Exchequer's perspective in 11 years following construction, yielding a positive net present value from that point onwards.

The year-on-year distribution of these costs, broken down by category, can be seen below. Data specifically for the eleventh year after construction occurs is included, to show the cumulative present value changing from negative to positive in this year.

³⁴ Capital grant required to meet social housing need in England 2021 – 2031, NHF

Table 12: Timeline of Exchequer impacts, including break-even point, £ million, net present value

Impacts	Base year	Year 1	Year 2	...	Year 10	Year 11	...	Total
Government grant	-11,825			...			...	-11,825
Savings on Housing Benefits		236	228	...	173	167	...	4,485
Tax benefits from construction ³⁵		2,473		...			...	2,473
Savings on Universal Credit		173	167	...	127	122	...	3,289
Savings on Health Services		272	262	...	199	193	...	5,170
Savings on Homelessness Services		237	229	...	174	168	...	4,512
Income Tax Increase ³⁶		126	126	...	126	126	...	3,793
Cumulative present value	-11,825	-8,309	-7,297	...	-195	582	...	11,896

Source: Cebr analysis

³⁵ To be conservative, it is assumed that there is a one-year lag between the full receipt of these and the construction activity. In practice, some of this revenue is likely to be received in the base year.

³⁶ The approach for assessing these benefits involved converting inputs to present value at the outset, rendering nominal figures unavailable. Therefore, these are net present value figures averaged across 30 years.

5. Combined socioeconomic value of building 90,000 social homes



The programme yields a net positive social and economic impact, with an estimated aggregate net benefit of £51.2 billion.

Aggregating the calculated impacts across the previous sections allows us to gauge the cumulative socioeconomic value of constructing 90,000 social homes. Given the recurrent nature of many benefits, we sum these up over a 30-year horizon, while factoring in the total funding cost and applying a discount factor of 3.5%. This provides an estimate for the net present value of the aggregate impact over the long term. Therefore, all the costs and benefits referred to in this section are expressed in present value terms.

Timeline of impacts

- We assume that the total expenditure of £35.4 billion for building 90,000 homes is incurred in the base year, with benefits starting to accrue from the subsequent year.
- In the first year post-construction, we expect total benefits of £32.6 billion. This would primarily be driven by the direct, indirect, and induced GVA contributions from the construction impact outlined in Section 2.
- From the second year onwards, it is expected to generate recurring annual benefits. These result from the management of more social housing, savings on housing benefits, and wider indirect benefits (such as reduced homelessness, increased employment, and savings on healthcare).
- The recurring benefits are projected to bring the programme to break even in **the third year post-construction, achieving a positive net present value thereafter** as shown in the table below.

Table 13: Timeline of impacts for the first 4 years following construction, £ million, net present value

Impacts	Base year	Year 1	Year 2	Year 3	Year 4	...	Total
Construction costs	-35,367					...	-35,367
Economic impact of construction		27,356				...	27,356
Tax revenue from construction		2,473				...	2,473
Economic impact of management		1,094	1,057	1,021	987	...	20,823
Savings on housing benefits		236	228	220	212	...	4,485
Indirect benefits to Exchequer and society		1,407	1,374	1,341	1,310	...	31,413
Total annual impact	-35,367	32,565	2,658	2,582	2,509	...	
Cumulative present value	-35,367	-2,801	-143	2,439	4,949	...	51,183

Source: Cebr analysis

Overall, our analysis indicates that the programme yields a net positive social and economic impact, with an estimated aggregate net benefit of £51.2 billion. A detailed breakdown of the total costs and benefits across the 30 years is presented in Table 14 below.

Table 14: Aggregate benefits, £ million, net present value

	Benefit stream	Net impact
Economic impact from construction and management	Direct GVA from construction	10,387
	Indirect and induced GVA from construction	16,969
	Aggregate GVA from managing housing stock	20,823
Direct benefits to the Exchequer	Savings on Housing Benefits	4,485
	Tax revenue from construction	2,473
Indirect benefits to the Exchequer and wider society	Direct GVA from increased employment	8,882
	Healthcare - savings to the NHS	5,170
	Savings on Homelessness services	4,512
	Income tax and NI from increased employment	3,793
	Savings on Universal credit	3,289
	Fewer disruptions to education	2,709
	Benefits from lower crime	3,058
Cost	Cost of construction	-35,367
Net present value		51,183

Source: Cebr analysis

Appendix

Supplementary tables for the economic impact of managing the existing stock of social housing

The figures presented below use the same framework discussed in Section 2, but simply change the input for the number of homes to consider the economic impact of managing the existing social housing stock. Figures are presented for one year only, expressed in 2023 prices but based on the stock of social rent homes in 2022. There is no publicly available dataset which estimates the stock of Social Rent homes in England broken down by region. Therefore, we illustrate the impact of the existing stock based on the number of homes in the wider social rented sector, which consists of all dwellings provided by local authorities and Private Registered Providers (PRPs), rather than those in the Social Rent tenure exclusively.

Table 15: Number of social housing dwellings, 2022 ³⁷

Region	Social rented sector
North East	271,593
Yorkshire and the Humber	425,030
North West	591,053
East Midlands	271,923
West Midlands	451,743
South West	342,017
East of England	405,472
South East	537,821
London	811,438
England	4,194,782

Source: Department for Levelling Up, Housing and Communities (Table 100)

Table 16: Regional aggregate turnover impacts for existing social homes managed, £m, 2023 prices

Region	Direct impacts	Indirect impacts	Induced impacts	Aggregate impacts
North East	1,423.3	766.6	436.0	2,625.9
Yorkshire and the Humber	2,996.0	2,382.9	1,237.4	6,616.4
North West	3,817.0	1,793.7	1,280.3	6,891.0
East Midlands	2,316.2	1,996.3	1,012.6	5,325.1
West Midlands	3,276.7	2,355.1	1,190.3	6,822.1

³⁷ Includes dwellings by local authorities and private registered providers

South West	2,762.3	2,456.9	1,210.4	6,429.7
East of England	3,584.4	3,065.7	1,489.0	8,139.2
South East	5,386.6	4,817.3	2,180.5	12,384.3
London	9,780.8	8,373.0	5,034.6	23,188.5
England	35,343.3	34,088.7	16,298.3	85,730.3

Source: MHCLG, NHF, ONS, Cebr analysis

Table 17: Regional aggregate GVA impacts for existing social homes managed, £m, 2023 prices

Region	Direct impacts	Indirect impacts	Induced impacts	Aggregate impacts
North East	695.0	365.6	277.8	1,338.4
Yorkshire and the Humber	1,463.0	1,140.4	786.9	3,390.3
North West	1,863.9	865.1	817.6	3,546.6
East Midlands	1,131.0	950.1	645.5	2,726.6
West Midlands	1,600.0	1,117.0	757.5	3,474.5
South West	1,348.9	1,182.4	771.3	3,302.5
East of England	1,750.3	1,476.0	952.7	4,179.0
South East	2,630.4	2,345.9	1,393.8	6,370.0
London	4,776.2	4,112.6	3,267.2	12,155.9
England	17,258.8	16,671.5	10,334.3	44,264.5

Source: MHCLG, NHF, ONS, Cebr analysis

Table 18: Regional aggregate employment impacts for existing social homes managed, number of jobs

Region	Direct impacts	Indirect impacts	Induced impacts	Aggregate impacts
North East	11,672	4,382	3,319	19,373
Yorkshire and the Humber	27,800	15,622	10,658	54,081
North West	30,221	10,155	9,488	49,865
East Midlands	16,148	9,815	6,601	32,564
West Midlands	19,943	10,114	6,742	36,799
South West	16,669	10,432	6,807	33,908
East of England	22,118	13,529	8,680	44,326
South East	27,912	17,862	10,593	56,367
London	44,829	27,210	21,679	93,718
Total	217,314	150,166	93,175	460,654

Source: MHCLG, NHF, ONS, Cebr analysis

Table 19: Regional aggregate employee compensation impacts for existing social homes managed, £m, 2023 prices

Region	Direct impacts	Indirect impacts	Induced impacts	Aggregate impacts
North East	388.4	166.7	120.3	675.4
Yorkshire and the Humber	817.5	522.5	341.7	1,681.7
North West	1,041.6	398.7	356.0	1,796.2
East Midlands	632.0	430.6	279.1	1,341.7
West Midlands	894.1	514.0	328.8	1,737.0
South West	753.8	535.8	334.7	1,624.2
East of England	978.1	673.2	416.0	2,067.3
South East	1,469.8	1,068.4	605.8	3,144.0
London	2,668.9	1,847.1	1,406.3	5,922.3
England	9,644.2	7,705.7	4,540.5	21,890.5

Source: MHCLG, NHF, ONS, Cebr analysis



C. High Peak Borough Council Growth Strategy 2025–2028

HIGH PEAK BOROUGH COUNCIL

Report to the Executive

12th June 2025

TITLE:	Growth Strategy 2025-2028
EXECUTIVE COUNCILLORS:	Councillor Damien Greenhalgh – Deputy Leader & Executive Councillor for Regeneration, Tourism and Leisure Councillor Godfrey Claff – Executive Councillor for Community Safety & Planning Councillor Matt Taylor - Assistant Executive Member
CONTACT OFFICERS:	Andrew Stokes – Chief Executive Lorraine Wright – Head of Regeneration
WARDS INVOLVED:	Non-Specific

Appendices Attached

Appendix A: High Peak Growth Strategy 2025-2028

Appendix B: High Peak Growth Strategy 2025-2028 Action Plan

1. Reason for the Report

- 1.1 The purpose of this report is to approve the proposed High Peak Growth Strategy (2025-2028)

2. Recommendations

It is recommended that the Executive::

- 2.1 Approves the Growth Strategy attached at Appendix A
- 2.2 Approves the Growth Strategy Action Plan attached at Appendix B

3. Executive Summary

- 3.1 Growth in both housing and employment is essential to ensure that High Peak maintains sustainable communities. The delivery of new housing and employment is below the targets in the Local Plan adopted in 2016. This position has been worsened by the revisions to the National Planning Policy

Framework (NPPF) in December 2024. The formula that determines the future housing requirement sees the Council having new minimum housing figures significantly in excess from both past delivery and past projections of likely household numbers.

- 3.2 The process for the review of the Local Plan has commenced with a target for submission in Spring 2026. The new Local Plan will need to address both the larger housing requirement (553 units up from 350) and the under delivery of both housing and employment over the current local plan period to date.
- 3.3 In order to provide new momentum into attaining the required growth in both housing and employment, the Council committed in its Borough Plan 2023-2027 to refresh its Growth Strategy to put some momentum into delivery.
- 3.4 The Growth Strategy (attached at Appendix A) is structured and summarised in this report as follows:
- Local Economy and Housing Market (summarised in Section 8)
 - Strategic Context (summarised in Section 9)
 - Challenges & Opportunities (summarised in Section 10)
 - Principles (summarised in Section 11)
 - Ambitions / Missions (summarised in Section 12)
 - Constraints (summarised in Section 13)
 - Interventions / Actions (summarised in Section 14)
 - Delivery Arrangements (summarised in Section 15)
- 3.5 The Economy and Growth Select Committee has been considering the issues and challenges in the High Peak and at its meeting on 2nd June 2025 the Committee supported the Growth Strategy (attached at Appendix A) and the Growth Strategy Action Plan (attached at Appendix B). Scrutiny of its implementation will be overseen by the Committee who will also play a policy development role in relation of a number of the actions.

4. How this report links to Corporate Priorities

- 4.1 The Growth Strategy will provide the strategic framework for activities that will make High Peak a thriving district. It will focus on delivering the Borough Aim 3 'to protect and create jobs by supporting economic growth, development and regeneration.'
- 4.2 The key focus of the strategy will be to contribute to improving the quality of life for local people by facilitating housing delivery, helping businesses to grow, improving the quality of public places, and addressing economic inequality.

5. Alternative Options

- 5.1 There are no options to consider at this stage

6. Implications

6.1 Community Safety - (Crime and Disorder Act 1998)

Consideration for proposals for all new proposals take account of community safety and Secured by Design principles.

6.2 Workforce

None

6.3 Equality and Diversity/Equality Impact Assessment

This report has been prepared in accordance with the Council's Diversity and Equality Policies.

One of the guiding principles of Growth Strategy is inclusive growth. The Council will seek to secure economic growth that creates opportunities for all segments of the population. The Council is committed to working with representatives of specific localities to focus on initiatives that have high levels of social value.

6.4 Financial Considerations

There is a direct link of housing and business growth to the Council's longer term financial sustainability. The direct benefits to the Council's financial position is as follows:

- Council Tax Income – growth in the number of residential units increases the Council Tax base and results in increased council tax revenue.
- Business rates income – development of new business premises results in increased business rates.
- Growth Incentive Grants – the current New Homes Bonus provides for a grant paid by central government to local councils to reflect and incentivise housing growth in their areas.

6.5 Legal

None

6.6 Climate Change / Sustainability

Activities in the Growth Strategy will also align with the Council's Climate Change Strategy and Action Plans reflecting a shared focus on promoting the growth of a carbon neutral economy.

One of the guiding principles of Growth Strategy is Green Growth to help create the conditions for environmentally sustainable economic growth across the district.

6.7 Conservation and Enhancement of Biodiversity

The Council is committed to ensure that growth recognises the environmental sensitivity of the High Peak and maximises the impact on biodiversity and the best outcomes for nature.

6.8 Consultation

The Council's Economy and Growth Select Committee has been engaged and had a significant input to the Growth Strategy

6.9 Risk Assessment

The risks associated with all actions and interventions contained within the strategy will be managed in line with the Council's project management methodology

ANDREW P STOKES
Chief Executive

Web Links and
Background Papers

[PLAN FOR CHANGE: Milestones for mission-led government](#)

[Invest 2035: Modern Industrial Strategy](#)

[English Devolution White Paper: Power and Partnership: Foundations for Growth](#)

[National Planning Policy Framework](#)

Contact details

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7. Background & Introduction

- 7.1 Growth in both housing and employment is essential to ensure that High Peak maintains sustainable communities.
- 7.2 The High Peak Local Plan was adopted in 2016. The Local Plan provides the planning framework to enable the provision of new housing and commercial development across the district. The 2016 plan determined a housing requirement of 350 dwellings per annum or 7,000 over the plan period 2011-2031.
- 7.3 The 2016 plan currently is under review. The timetable for the review is as follows:

Early engagement	January-March 2023
Preferred Options consultation	Spring 2025
Proposed Submission consultation	Winter 2025
Submission of Local Plan	Spring 2026
Examination	Summer 2026
Adoption	Autumn 2026

- 7.4 The housing requirements have now been superseded by the National Planning Policy Framework that was published in December 2024 which has increased the target to 553 dwellings per annum. This figure is based on the current number of dwellings plus an annual growth rate plus an additional multiplier based on the ratio of house prices to workplace earnings.
- 7.5 Consequently, the latest Statement of Five-Year Housing Land Supply as at 1st April 2025 shows that at 2.85 years the Council now cannot demonstrate a 5-year land supply. The new Local Plan will need to address both this larger housing requirement and the under delivery over the current plan period to date.
- 7.6 The impact of the new housing requirements results in a significant increase in the number of dwellings that will be required over the new Local Plan period illustrated as follows:

	2016 Local Plan Requirement	Previous Standard Method	New Standard Method
Annual requirement	350	243	553
5-year requirement	1,750	1,215	2,765
Plan Period requirement (18 Years)	6,300	4,374	9,954

- 7.7 Work will also be required to quantify the demographic impact of the additional dwellings to ensure that other aspects of the Plan, such as employment land,

supporting services and infrastructure reflect the predicted population. In particular a high-quality housing stock is also crucial to attracting and retaining employers

- 7.8 In order to provide new momentum into attaining the required growth in both housing and employment, the Council committed in its Borough Plan 2023-2027 to refresh its Growth Strategy to put some momentum into delivery. The Economy and Growth Select Committee has been considering the issues and challenges in the High Peak and at its meeting on 2nd June 2025 the Committee supported a draft of the proposed Growth Strategy 2023-2028 (attached at Appendix A) and Action Plan (attached at Appendix B) which are summarised in this report for approval by the Executive.

8. Local Economy and Housing Market

- 8.1 The demographic and economic profile of the High Peak is set out in detail in Section 1 of the Strategy. The key characteristics can be summarised as follows:

Environment

- Two-thirds (c70%) of the borough lies inside the Peak District National Park Authority. Of the remainder of the High Peak, around 15% is designated as Green Belt.
- The landscape and historic environment contain a large and particularly rich stock of protected assets.

Population

- The 2021 census recorded usual resident population of the High Peak of 91,104 with the population size changing very little since 2011
- The population continues to age, and by 2021, 21.9% of the population was 65 and over, an increase of 27% since 2011. The area had a higher average age (46 years) than the East Midlands as a whole in 2021 (41 years) and a higher average age than England (40 years).

Business Landscape

- The business structure of the area is dominated by micro businesses of less than 10 employees of which there are 3,430 which is 89.1% of businesses. This is higher than the East Midlands average of 88.9% and significantly higher than the UK average of 21%.
- In 2023 manufacturing was the largest sector at 19% of the total workforce, which is surprisingly strong in the High Peak since it is higher than the East Midlands at 12% and Great Britain at 7.5%.

- Despite the pandemic, the workforce in accommodation & food and arts, entertainment & recreation has remained stable at 13%.
- The mining and quarrying industry is traditionally important for the area and although it only supports 2% of the workforce.
- Tourism is a significant economic sector in High Peak with the area attracting some 5 million visitors each year who then spend c£300m,

Business Development

- The business formation rate for 2023 was 10.12%, an increase from December 2020 when it fell to a low of 9.09%. The rate for High Peak is now above the Derbyshire rate of 9.33% although it is still below the East Midlands rate of 10.78% and the England rate of 11.13%.
- The business closure rate for High Peak in 2023 was 10.06% which was below the Derbyshire rate of 10.65 %, the East Midlands rate of 11.18% and the England rate of 10.89%.
- Business survival rates continue to be above the Derbyshire and English averages.
- Productivity rates are comparatively low, Gross Value Added (GVA) per head in High Peak was £19,219 which was below the Midlands Engine area, £26,422 and the UK, £33,227.

Business Workforce

- The proportion of the resident working age population in the High Peak who are economically active in 2024 has risen over the past five years and at 83.5% is above the UK average of 78.5%.
- A substantial proportion of residents commute out of the area for work, largely to Greater Manchester, Cheshire and the Derbyshire Dales.
- In 2024 65.9% of residents in the High Peak were classed as managers, directors, senior officials or professional occupations which was higher than the Great Britain average of 53.4%.
- The median gross hourly pay of full-time employees (resident based) in 2023/24 was £18.82 which compares favourably with the East Midlands regional average of £17.59. However at £15.999 the Median gross hourly pay of full-time employees (workplace-based) was lower than the regional average of £16.47.
- The apprenticeships participation rate (in line with national and regional trends following a change in the funding system), has decreased, with a fall of 8% between 2017/18 - 2022/23 from 2,573 per 100,000 population to

2,366 per 100,000 population, although this was lower than the average decline in the East Midlands region of 15.5%.

Housing

- According to the 2021 census 71% people owned their own home (either outright or with a mortgage) which is above the England average of 61.3% although it had fallen from the 2011 figure of 72%.
- The number of residents in social or private rented accommodation at 28.3% was well below the England average of 37.7%.
- High Peak has the second highest median house price to median salary ratio in 2023 at 7.4. The highest in Derbyshire was Derbyshire Dales at 9.1 whilst in England and Wales the ratio is 8.174.
- The delivery of new homes in the High Peak is below target.

Town Centres

- Despite rising rates of vacant units in four of the five main town centres, In October 2021 towns in High Peak had an overall shop occupancy rate above the national average for the high street at 91% compared to the UK average of 88.2% and an East Midlands average of 88.4%.
- The Revitalising Buxton development seeks to diversify the housing offer with a market-shaping scheme that meets the needs and expectations of residents, both existing and prospective. Further, it will provide contemporary office space and civic facilities in the centre of town as well as introduce new uses including leisure and hospitality to support a thriving nighttime economy.
- The Council is leading a multi-million pound transformation to rejuvenate Glossop Hall's which will see the historic buildings remain at the heart of the town centre. There will be new business opportunities, including for creatives and entrepreneurs, as well as new food and drink, leisure and socialising spaces, and places for community use.

9. Strategic Context

- 9.1 Section 2 of the Growth Strategy sets out the strategic context which will ensure delivery of strategic plans and initiatives operating at the national, regional and local scales.
- 9.2 The Government has established economic growth as its number one ambition. The national policy context which has informed the Strategy is as follows:

- The five core missions set out in **PLAN FOR CHANGE: Milestones for mission-led government**
- The 10-year Industrial Strategy **Invest 2035: Modern Industrial Strategy**
- The plans for widening and deepening devolution in England with universal coverage of Strategic Authorities as set out in **the English Devolution White Paper: Power and Partnership: Foundations for Growth**
- The ambitious milestone of **building 1.5m safe and decent homes in England** this parliament.
- The reforms to the planning system including the new **National Planning Policy Framework** which reintroduced mandatory and increased housing targets and the five-year land supply rules
- The commitment to **increase the supply and delivery of social and affordable housing**
- The commitment to delivering clean power by 2030 and accelerating to net zero.

9.3 There are a number of areas of activity where the Council is collaborating with a range of partners to pursue shared priorities. The regional policy context that has been reflected on the Growth Strategy is as follows:

- **East Midlands Devolution** - the emerging policy of the East Midlands Combined County Authority (EMCCA) in respect of transport, housing, net zero and economic development / skills and adult education. The combined authority aims to attract more public and private investment to the East Midlands to boost the local economy and enhance the quality of life for residents. There is also the potential of deepening devolution as set out in the English Devolution White Paper.
- **EMCCA Inclusive Growth Commission** - launched to take a systems level approach to developing recommendations for a set of long-term, strategic goals across economic, social and natural systems – and recommendations for short- and longer-term steps partners in the area could take to deliver against them. In turn, the Commission's recommendations will inform an Inclusive Growth Strategy for the East Midlands
- **Peak Partnership Summit** - Recognising that, whilst the Peak District is located predominately in Derbyshire, parts of it stretch into Greater Manchester and South Yorkshire. Collaborative work has commenced between the three regional Mayors to tackle issues and realise the opportunities the Peak District, and its surrounding towns and villages, presents.

- **Local Visitor Economy Partnership (LVEP)** - Visit Peak District, and Derbyshire was successful in its joint application with Derby City to become a Local Visitor Economy Partnership (LVEP) and the new Peak District, Derbyshire and Derby City LVEP Board was established in October 2023. The work of VPDD will be important in providing the support necessary to ensure the sector continues to grow and strengthen.
- **Invest in Derbyshire** - the Inward Investment Agency for Derbyshire whose aim is to welcome inward investment alongside a thriving indigenous business base to make a significant contribution to our economy through job creation, innovation, research and development.

9.4 At the local level, the Growth Strategy aligns closely with the Council's Borough Plan (2023-27). The Growth Strategy will provide the strategic framework for activities that will make High Peak a thriving borough. It will focus on delivering the Borough Aim 3 'to protect and create jobs by supporting economic growth, development and regeneration.'

9.5 Activities in the Growth Strategy will also align with other key Council policy including:

- **High Peak Local Plan** – it will inform the review of the Local Plan. The new Local Plan needs to have regard to other strategies and programmes where they have a spatial component and can guide the distribution of development. The broad spatial strategy for the emerging Local Plan will need to be influenced by / aligned with the Growth Strategy to address both the larger housing requirement and the under delivery over the current plan period to date. The new local plan will also need to be supported by a revised Green Belt assessment that considers Grey Belt definition and issues.
- **High Peak Tourism Strategy** - this strategy provides more detail of the issues and interventions in respect of the visitor economy. It identifies the Council's vision, key priorities for growth and action plan for tourism delivery in the High Peak over the next five years.
- **Financial Sustainability** - there is a direct link of housing and business growth to the Council's longer term financial sustainability as it generates additional council tax and business rates income and growth incentive grants e.g. new homes bonus. There are also the wider economic benefits of growth
- **Climate Change Strategy and Action Plans** - reflecting a shared focus on promoting the growth of a carbon neutral economy.

10. Challenges & Opportunities

10.1 Section 3 of the Growth Strategy sets out the main challenges and opportunities for the Council to secure future growth in the High Peak.

10.2 The main challenges are as follows:

- The national economy currently presents challenging conditions for local economic growth.
- The local economy has experienced lower levels of business growth than the national average, evidenced by the business start-up rate being comparatively low.
- Housing delivery is falling short of delivery targets and the new targets in the NPPF will provide a significant challenge.
- The population has not increased yet the proportion of people aged 65 to 74 rose by 28.4%
- Changing patterns of consumer and retailer behaviour are having a negative impact on footfall in town centres, threatening the longer-term viability of those centres.
- The aim of becoming a carbon neutral borough will require significant adaptation in housing and commercial developments and in business, workforce, consumer and visitor behaviour.
- High Peak workplace earnings are comparatively low despite residents' earnings being above average regionally.
- Productivity levels are comparatively low.
- There is a limited supply of employment land that is available for immediate development including a lack of good quality small to medium sized industrial premises and start-up or Enterprise facilities.

10.3 The opportunities that can be built on as follows:

- The successful devolution creation of EMCCA will provide additional local investment and the opportunity to work more closely with partners to facilitate inward investment.
- Re-orientating the local economy towards higher-value growth through business support and skills investment, will attract and retain a skilled workforce, increase the number of residents with level 3 and 4 qualifications and help reduce the economic inactivity rate.
- Innovative land use allocations can support business expansion.
- The vitality and viability of town centres can be improved through place making investment, including developing and enhancing the leisure-based offer.
- Strengthening High Peak as a visitor destination and base for longer staycations to explore the Peak District will attract more overnight visitors.
- Building relationships with partner organisations, businesses, developers and landowners will facilitate sensitive new employment and residential development.
- Promoting High Peak's affordable and quality of life offer and potential to hybrid or remote work will attract entrepreneurs and skilled workers to the area.
- Ensuring local benefits of major developments are maximised through procurement of social value.
- Proactively promoting the use of surplus land or stalled sites to facilitate new development
- Promoting High Peak as a great place to live or to start or to grow a business due to its central location, established business base, workforce

catchment, competitive cost location, high quality housing and access to leisure facilities.

11. Principles

11.1 In pursuing the growth objectives contained in the strategy, the Council will be guided by four overarching principles which are set out in Section 4 of the Growth Strategy:

- **Inclusive Growth** - economic growth that creates opportunities for all segments of the population – the Council is committed to working with representatives of specific localities to focus on initiatives have high levels of social value.
- **Green Growth** - help create the conditions for environmentally sustainable economic growth across the borough.
- **Design / Heritage / Natural Environment** - planning positively for high quality and inclusive design for all development - recognising environmental and historic sensitivity and maximising the impact on biodiversity and the best outcomes for nature.
- **Sustainability** - promoting the growth of higher-value businesses (in manufacturing and service-based sectors) that can deliver higher-skill and higher-wage jobs for High Peak's residents.

12. Ambitions / Missions

12.1 Section 5 of the Growth Strategy sets out the Council's growth ambitions and missions.

12.2 The ambitions are:

- **Housing** - Working with housebuilders to bring forward new housing sites for development to ensure that the High Peak is a sustainable location to live; and
- **Employment** - Build a more resilient economy that can deliver a range of quality employment opportunities and to ensure that local people have the right mix of skills to benefit from the new jobs which are created.

12.3 Over the next three years, the Council will focus on six missions to facilitate growth in the district:

Mission 1 - Accelerate Housing Delivery

- Unlocking existing Local Plan housing site allocations
- Implementing a council scheme to mitigate nutrient neutrality
- Identifying potential new allocations

- Enhancing the approach for the delivery of affordable, social and supported housing delivery
- A proactive approach to ensuring that empty properties are brought back into use

Mission 2 - Increase Employment Growth

- Unlocking existing Local Plan employment site allocations
- Identifying potential new allocations
- Developing an approach to redeveloping vacant premises and undeveloped brownfield land
- Recognising the need for high value growth

Mission 3 - Develop the Local Visitor Economy

- Working with partners to deliver the High Peak Tourism Strategy
- Encouraging and facilitating new and more sustainable growth to enhance the local visitor economy

Mission 4 - Support and Diversify the Rural Economy

- Working with communities to develop Neighbourhood Plans where appropriate
- Facilitating local regeneration schemes through local regeneration funding

Mission 5 - Further Regenerate Towns

- The refresh / development of locality plans and town centre design guidelines that build on existing strengths
- Facilitating the development of a community-led approach through proactive engagement with community representatives
- Developing strong town centre partnerships including all representative stakeholders

Mission 6 - Support Business and the Development of Skills

- Support small businesses and encourage new business start-ups
- Developing strong links with regional skills agencies and local providers
- Strengthening relationships with the borough's large employers to sustain their development

13. Constraints

13.1 The are several constraints to attaining the necessary growth in housing and employment which are set out in Section 6 of the Growth Strategy. The strategy recognises these and will adopt a proactive role in the mitigation of them.

13.2 The constraints and proposed mitigations are as follows:

- **Local Transport Plan / Public Transport** - the authority will work closely with Derbyshire County Council and EMCCA to ensure the Growth Strategy relates closely to their Transport Strategies

- **Green Infrastructure** – the Strategy will build upon the existing network of green infrastructure to develop design standards for new development that consider these requirements from the outset and how any proposed development will connect to the wider network
- **Social Infrastructure** - working with communities including local parish councils, voluntary and community groups to maintain the special characteristic of the district ensuring retention and development of local services and community facilities
- **Other Infrastructure** – engaging with utility providers to ensure that strategic infrastructure e.g. water and waste drainage investment supports development in line with local growth ambitions.
- **Developer Contributions** - the Council recognises that development will have resultant impacts on a wide range of local infrastructure in the area. The Council will develop a creative and strategic approach to utilisation of developer contributions in line with the Developer Contributions Supplementary Planning Document (SPD)
- **Land Supply** – development land supply is at premium as two-thirds of the Borough lies inside the Peak District National Park Authority and 15% is designated as Green Belt. Critical to identifying sites in the new local plan will be consideration of the Spatial Strategy which will dictate where in the High Peak future development by located. The Council will take a proactive approach to intervention, Council investment and working with neighbouring authorities to create a complementary offer and to take a sub-regional approach. The Council will also consider its own assets to explore opportunities for facilitating growth
- **Inward Investment** - the Council will develop a new approach to attracting inward investment into the High Peak including place and development opportunity marketing. It will also work closely with local stakeholders and strategic partners to secure future investment and development

14. Interventions / Actions

- 14.1 Section 7 of the Growth Strategy sets the current and proposed future interventions to facilitate growth.
- 14.2 Details of the interventions are set out in the Growth Strategy Action Plan which is attached at Appendix B. The Action Plan sets out the interventions in five categories:

Local Plan
Regeneration
Enabling Actions
Employment & Skills
Delivery

14.3 The interventions include:

- Delivery of the Accelerated Housing Delivery Plan (AHDP)
- Completion of the Housing Infrastructure Fund (HIF) project at Fairfield Buxton
- A strategic review of options to increase the supply of Affordable and Supported Housing
- Delivery of the Empty Property Strategy
- A fundamental review of the strategic allocations for both housing and commercial development to ensure sites allocated in the Local Plan are deliverable
- Provide support to areas to develop Neighbourhood Plans
- Complete the Revitalising Buxton development
- Complete the Glossop Halls development
- Deliver locality based schemes through UKSPF.
- Develop town centre masterplans and locality plans
- Review empty, redundant and at-risk buildings or structures across the High Peak to establish an approach to repurposing for new uses
- Develop a high-level Acquisition and Investment Strategy to assess the potential interventions that could be undertaken by the Council both to stimulate development and generate future revenue.
- Consider land and assets owned by the Council to be made available for development
- Support and deliver the actions in the High Peak Tourism Strategy including facilitation of new developments such as improved visitor accommodation and town centre interventions.
- Identify suitable sites and develop a business case for development of employment / enterprise space to support start-up and expansion opportunities for small and medium businesses.
- Develop a creative and strategic approach to the utilisation of developer contributions in line with the Council's Developer Contributions SPD
- Work with partners and skills providers to provide targeted support for small and medium-sized businesses and to fund local skills needs and supplement local adult skills provision.
- Develop a refreshed approach to business support / skills to encourage new business start-ups in the borough

15. Delivery Arrangements

- 15.1 The Growth Strategy sets out that the Council will prioritise resources on activities where it can genuinely add value and will work proactively in partnership with other organisations and the private sector to secure the best possible outcomes for the area. The Council will develop, strengthen and enhance the following strategic partnerships to underpin the delivery of the Growth Strategy:

- Further develop and seek affordable housing delivery partnerships between the Council and local Registered providers or other potential partners
 - Continue and strengthen the relationship with Homes England
 - Initiate a Planning Forum to engage with current and potential developers
 - Strengthen relationships with the borough's large employers such as Swizzels Matlow, Nestle Water, Tarmac and Breedon
 - Develop active membership of the East Midlands Chamber of Commerce
 - Strengthen the relationship with Homes England
 - Engage proactively with Derbyshire County Council in respect of transport issues and development of their Local Transport Plan.
 - Proactive membership of EMCCA including ensuring that the cross boundary links with the Greater Manchester and South Yorkshire Combined Authorities are strong recognising their economic impact on High Peak
 - Engage with town and parish councils to establish new Town Centre & Locality Partnerships
 - Utilise the capacity of the Council's controlled company Alliance Norse to support project delivery
- 15.2 An ongoing **pipeline of potential projects** will be developed to maximise external funding opportunities, and a **comprehensive investment prospectus** will be developed setting out the opportunities in the High Peak for potential investors and developers
- 15.3 The officer Alliance Growth Board (including representatives from relevant services) will ensure the implementation of the Growth Strategy by fulfilling the following responsibilities:
- Develop and secure the effective arrangements for the delivery of the Growth Strategy
 - Support the development of effective relationships with national, regional and sub-regional partners to support the Council's growth ambitions
 - Promote the delivery of sites identified in the Local Plan
 - Maximise the income provided by government funding from growth incentives e.g. new homes bonus
 - Regularly review economic and housing statistics and indicators to identify targets for investment for consideration by members
 - Identify and maintain key delivery partnerships
 - Develop and maintain the 'pipeline' of investment projects
 - Provide advice on speculative development proposals
- 15.4 The Council will monitor all of the actions and interventions set out in the Growth Strategy. Scrutiny of its implementation will be overseen by the Economy & Growth Select Committee who will also play a policy development role in relation of a number of the actions.
- 15.5 The Council will continue to monitor the relevant economic indicators as part of its Performance Framework. These will be used to track the effectiveness of

the actions and interventions. The outcomes that are expected from successful implementation are as follows:

- Increased council tax
- Increased business rates
- Reversal of population decline
- Increased supply of housing including social housing
- Increased economic activity (e.g. business start-ups, business growth, job creation, etc.)
- Increased visitor dwell time and spend
- Reduced town centre vacancy rates
- Increased local pride
- Improved skills attainments
- Increased apprenticeships

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High Peak Borough Council

Growth Strategy 2025-2028

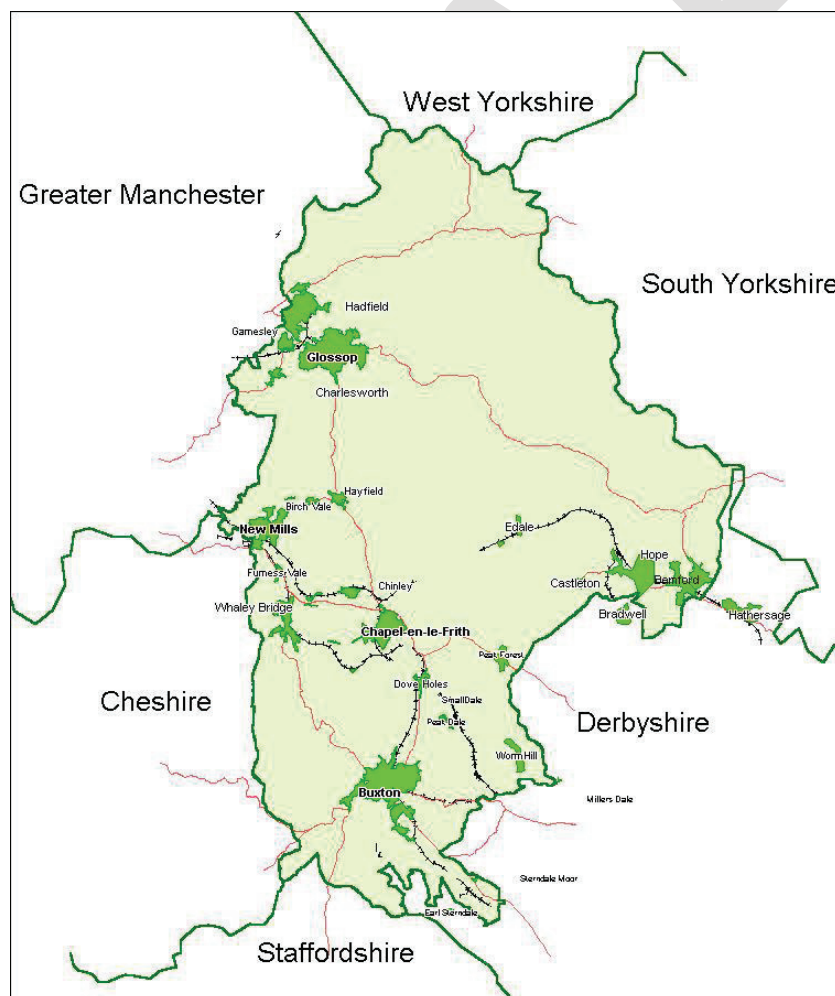
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1. High Peak Profile

Location & Characteristics

High Peak is in north-west Derbyshire in the East Midlands region, bordered by Cheshire to the south-west, Staffordshire to the south, Derbyshire Dales to the south-east, South and West Yorkshire to the north-east and north and Greater Manchester to the north-west. The borough covers an area of 53,915 hectares of which 30% is classed as rural.

Two-thirds (c70%) of the borough lies inside the Peak District National Park Authority. Of the remainder of the High Peak, around 15% is designated as Green Belt. The borough has close links to parts of Cheshire, Staffordshire, Yorkshire and Greater Manchester as well as to the cities of Sheffield, Manchester and Stoke-on-Trent, which provide significant employment opportunities and services for many people in the borough.



Area Map for High Peak

The landscape and historic environment of the borough is highly valued by both residents and visitors and contains a large and particularly rich stock of protected assets, reflected in the number of formal designations. There are extensive protected environments (SSSIs, Special Conservation Areas) distributed across the borough and particularly within the Peak District National Park boundary. The borough (outside the Peak District) also includes c500 listed buildings, 32 conservation areas, 3 registered parks and a vast number of designated archaeological heritage assets, both above and below ground.

High Peak has a distinctive character with picturesque towns and villages set against an upland gritstone landscape in the north, the Dark Peak and the softer limestone landscape to the south or White Peak. The towns have varied histories such as Buxton with its Georgian and Victorian spa heritage; the former mill towns of Glossop and New Mills; Whaley Bridge where the products of the local quarries were loaded on to the canal network and Chapel-en-le-Frith, the so-called Capital of the Peak due to the early administrative duties of the 11th Century church. The highest point of Derbyshire Kinder Scout lies in the High Peak as does the start of the Pennine Way at Edale.

The landscape of the High Peak is of national and international importance, its quality reflecting that of the adjacent Peak National Park, and the unique quality of the area provided by the sharp contrast of the softer White Peak landscape rubbing shoulders with the dark gritstone moorland Dark Peak. Consequently, the High Peak area contains not only nationally important upland moors and limestone dales but also areas which have received European recognition as landscapes of high value.

High Peak is also a special area with exceptionally beautiful buildings, whether singly within the landscape or collectively in towns and villages. In many places they appear to grow naturally out of the landscape or relate to public space such as a street or square in a town or village which contributes to the sense of delight. The Towns and villages in the High Peak have a distinct local character which has been defined by their architectural and historic development as well as by the use of natural materials such as stone. There are 3 Grade I listed buildings in High Peak which are The Crescent in Buxton, Peveril Castle in Castleton and the Church of St Peter in Hope.

There are currently 3 listed Historic Parks and Gardens in the High Peak, 2 in the town of Buxton and one in Glossop. The Peak Forest Canal runs through part of the High Peak and branches to terminate at the Grade II* Transhipment Warehouse at Whaley Bridge and

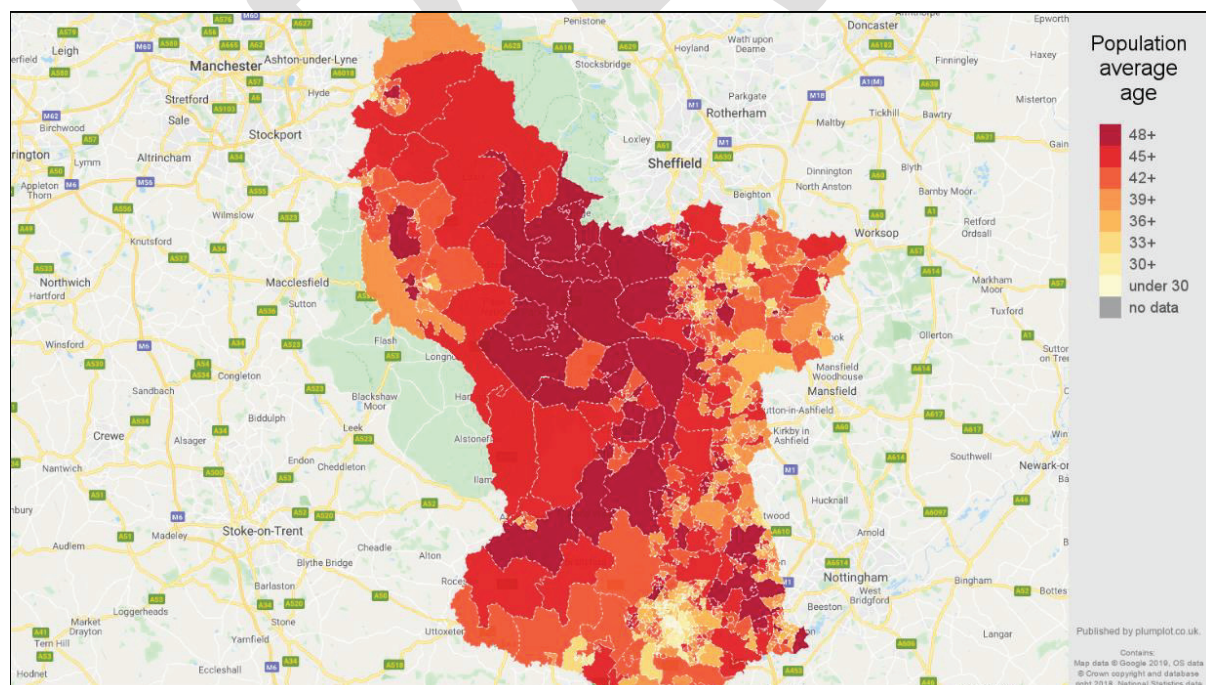
Bugsworth Basin which is a restored Scheduled Ancient Monument and was at one time the largest and busiest inland port on a narrow canal system and is the only one to survive intact.

Population

The 2021 census recorded a usual resident population of the High Peak of 91,104 with the population size changing little since 2011. This is the opposite of the regional trend for the East Midlands where the population increased by 7.7%.

From 2011 to 2021 the average age of a High Peak resident increased from 43 to 46 years of age. The number of people aged 65 to 74 rose by around 2,500, an increase of 28.4% whilst the number of residents between 35 and 49 fell by around 4,200 which equates to a 20.5% decrease.

As a result, the population continues to age and by 2021 21.9% of the population was 65 and over, an increase of 27% since 2011. The area had a higher average age (46 years) than the East Midlands as a whole in 2021 (41 years) and a higher average age than England (40 years).

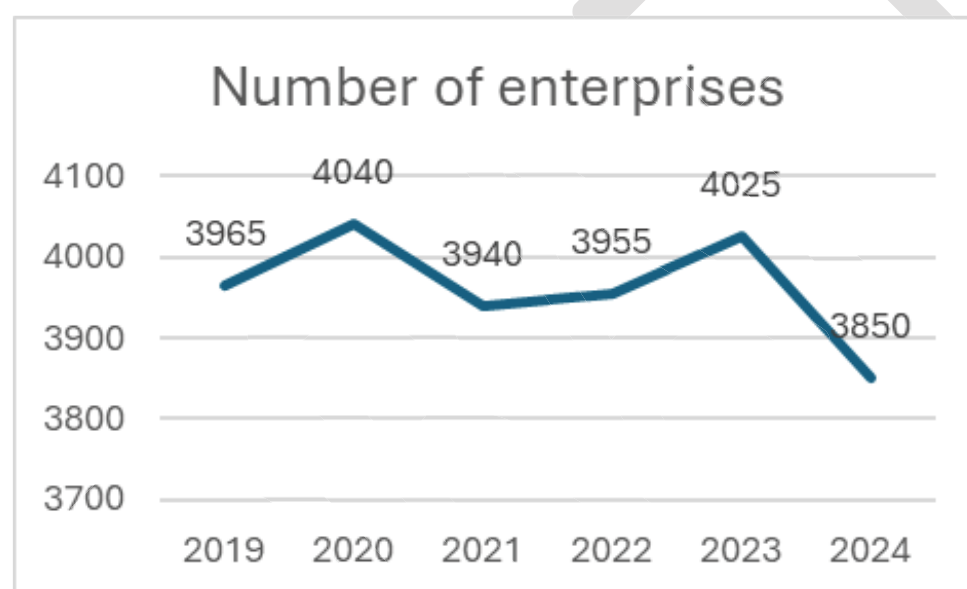


There are six main areas of settlement in the borough: Buxton in the south-west, New Mills in the west, Glossop in the north-west, Whaley Bridge and Chapel-en-le Frith in the central area and Hope Valley in the east.

Around 69% of the population is based in these six settlement areas with the three towns of Buxton, Glossop and New Mills having the greatest populations at 22%, 20% and 10% respectively. The remainder are divided among 17 rural parishes.

Business Landscape

There were 3,850 Enterprises based in High Peak in 2024. This is a slight fall since its peak in 2020 when there were 4,040 enterprises:



Source: Grant Thornton

There are only 60 workplaces that employ more than 50 people in the High Peak, with just 5 private sector businesses having more than 250 employees. The business structure of the area is dominated by micro businesses of less than 10 employees of which there are 3,430 or 89.1%. This is higher than the East Midlands average of 88.9% and significantly higher than the UK average of 21%.

In 2023 manufacturing was the highest sector at 19% of the total workforce, with motor trades (retail and repair) at 15% followed by health and social work at 13%. The manufacturing sector is surprisingly strong in the High Peak since it is higher than the East Midlands at 12% and Great Britain at 7.5%.

Despite the pandemic, the workforce in accommodation & food and arts, entertainment & recreation has remained stable at 13%.

The mining and quarrying industry is traditionally important for the area and although it only supports 2% of the workforce this is still significantly higher than East Midlands at 0.2% and Great Britain at 0.1%.

ONS Business Register and Employment Data

In 2015, 14.8m tonnes of aggregate resource were extracted from the High Peak and Derbyshire Dales districts (c.11.7mt in High Peak and c.3.0mt in Derbyshire Dales). The quarrying and mining sector is highly productive and in the 'Minerals & Aggregate Extraction in High Peak & Derbyshire Dales - A Sector Benefits Study 2017', it estimated that activities in the High Peak and Derbyshire Dales districts would contribute a total of £2.352bn in GVA to the local economy by 2040. The mining and quarrying of aggregates from the High Peak and Derbyshire Dales areas is a resource of national significance, contributing around 7% towards the national supply of minerals annually in 2017.

Minerals & Aggregate Extraction in High Peak & Derbyshire Dales - A Sector Benefits Study 2017

Attracting larger overseas-owned employers to the area to complement the existing employers is dependent on the availability of suitable sites. A recent economic-land needs assessment identified only 4 sites, covering 7.6ha as deliverable whilst 17 sites, 51.8ha were developable in the medium term whilst some existing but aging industrial estates could be improved for more modern uses.

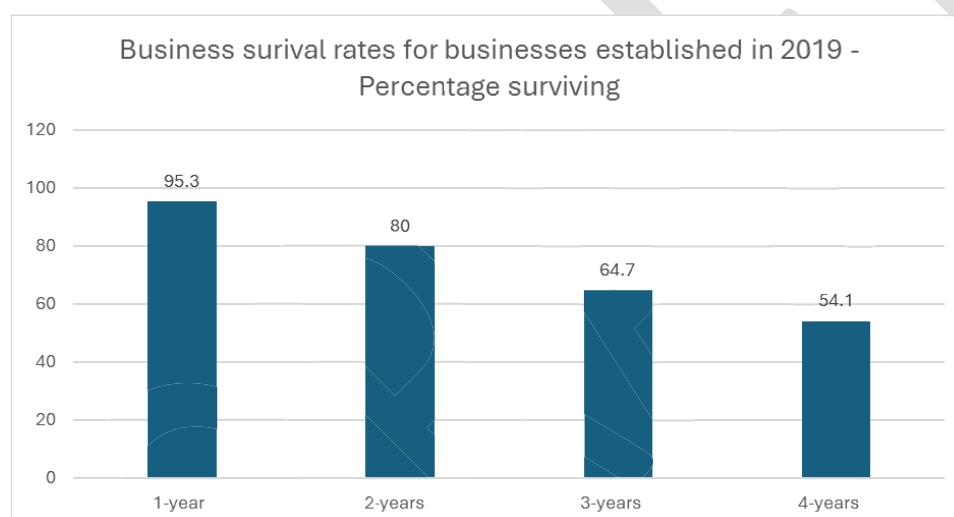
Tourism is a significant economic sector in High Peak with the area attracting some 5 million visitors each year who then spend c£300m, with approximately half of that on shopping and food and drink. Nevertheless the competitiveness of the national and international tourism market presents challenges to the High Peak and the many small, independent businesses for which the area is renowned. The most recent data suggests that day visits dominate due to the close proximity of the area of big centres of population such as Greater Manchester, Sheffield, Stoke-on-Trent and Derby. However day visits only account for 68% of the spend, showing the value of overnight stays. Buxton is an important driver of High Peaks tourism sector accounting for a third of all visits and economic impact. Visitors to the area are typically aged 55+ so the tourism strategy aims to broaden this visitor base and encourage visitors to stay longer and spend more.

Business Formation and Survival

The business formation rate for 2023 was 10.12%, an increase from December 2020 when it fell to a low of 9.09%. The rate for High Peak is now above the Derbyshire rate of 9.33% although it is still below the East Midlands rate of 10.78% and the England rate of 11.13%.

The business closure rate for High Peak in 2023 was 10.06% which was below the Derbyshire rate of 10.65 %, the East Midlands rate of 11.18% and the England rate of 10.89%.

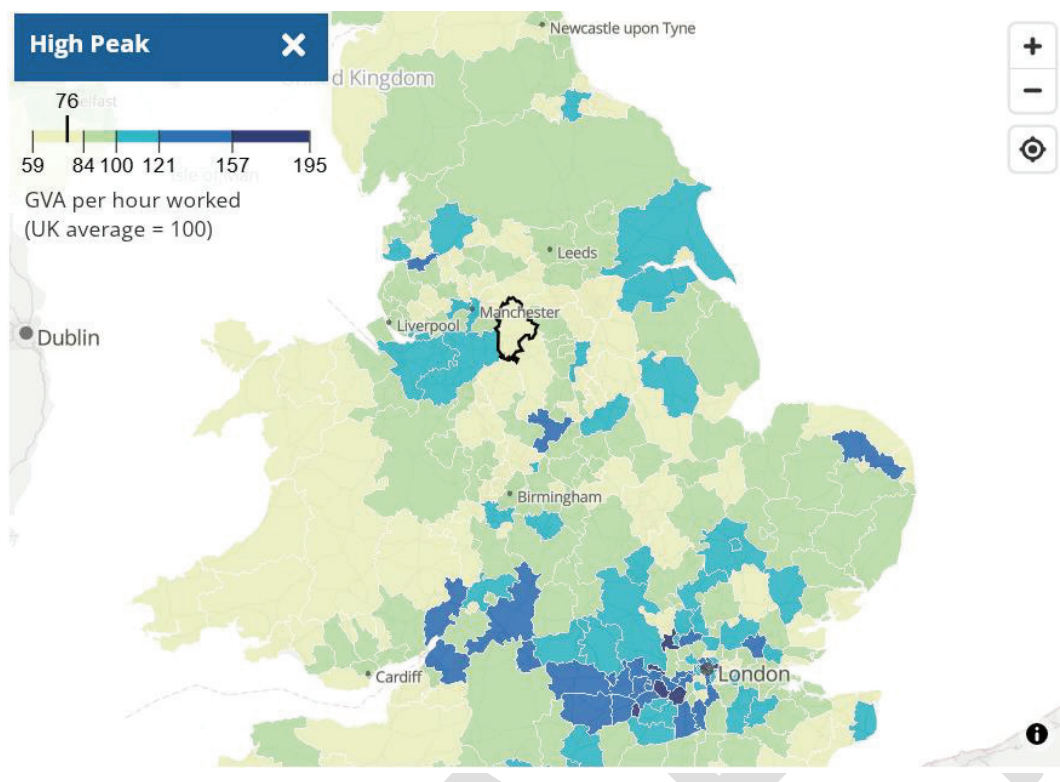
Business survival rates continue to be above the Derbyshire and English averages. Of the new businesses established in 2019, 54.1% were still trading in 2023, above the Derbyshire (49.7%), East Midlands rate (45.3%) and English rate (44.9%) and the highest survival rate of all Derbyshire districts and boroughs.



Source: ONS Business Demography, 2024

Productivity

In 2022, the total Gross Value Added (GVA) per head in High Peak was £19,219 which was below the Midlands Engine area, £26,422 and the UK, £33,227. The increase in GVA per head from 2021 was 12.5% which compared favourably with the increase in the Midlands Engine area, 7.1%, and the UK, 8.8%.



Office for National Statistics (ONS), released 17 June 2024, ONS website, statistical bulletin, [Regional and subregional labour productivity, UK: 2022](#)

Business Workforce

The proportion of the resident working age population in the High Peak who are economically active in 2024 has risen over the past five years and at 83.5% is above the UK average of 78.5%. A substantial proportion of residents commute out of the area for work, largely to Greater Manchester, Cheshire and the Derbyshire Dales.

Annual Population Survey, 2024

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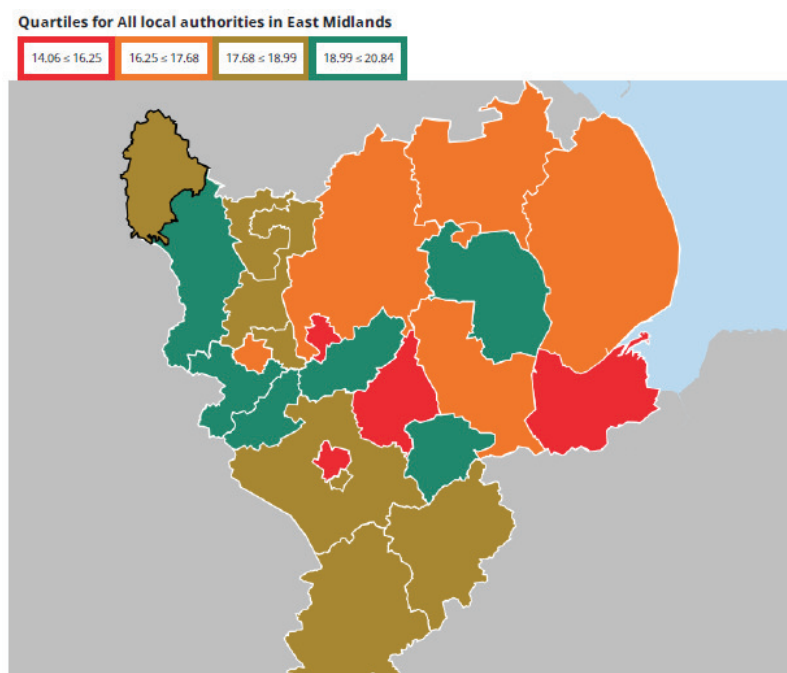
Source: ONS Census 2021

In 2024 65.9% of residents in the High Peak were classed as managers, directors, senior officials or professional occupations which was higher than the Great Britain average of 53.4%. The number of residents with the highest qualification levels (RQF4 and above) at 54.3% was also higher than the British average of 47.6%.

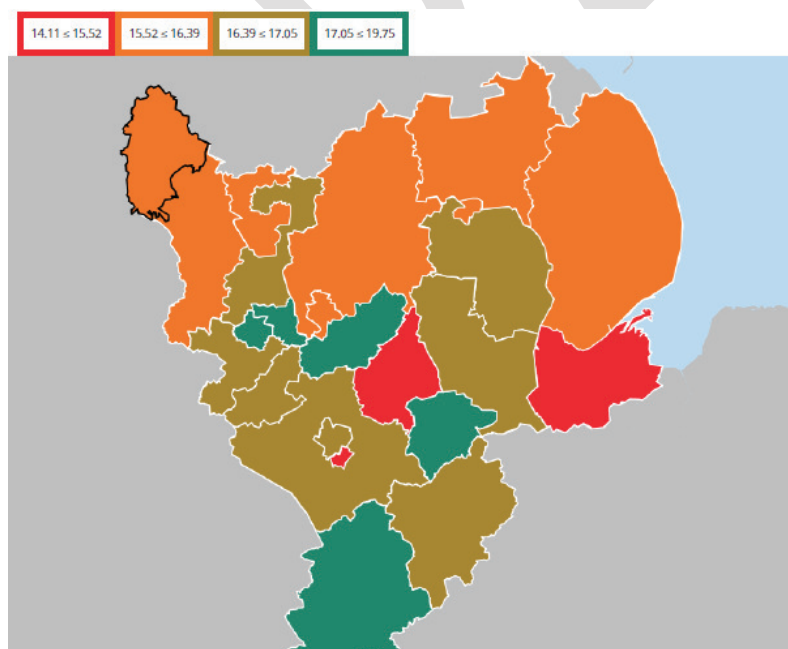
Office for National Statistics

In High Peak the median gross hourly pay of full-time employees (resident based) in 2023/24 was £18.82 which compares favourably with the East Midlands regional average of £17.59. However at £15.99 the Median gross hourly pay of full-time employees (workplace-based) was lower than the regional average of £16.47.

Median gross hourly pay of full-time employees (resident based) (2024) for All local authorities in East Midlands



Median gross hourly pay of full-time employees (workforce based) (2024) for All local authorities in East Midlands



Source: LG Inform

The provision of faster broadband would allow High Peak to diversify its economy, attract knowledge industries and digital business that can remote work, and stimulate local economies on a less seasonal basis.

EMCCA Emerging Spatial Vision, February 2025

Apprenticeships

The apprenticeships participation rate (in line with national and regional trends following a change in the funding system), has decreased, with a fall of 8% between 2017/18 - 2022/23 from 2,573 per 100,000 population to 2,366 per 100,000 population, although this was lower than the average decline in the East Midlands region of 15.5%.

	Apprenticeship participation rate per 100,000 population	
	High Peak	Local Authority districts East Midlands
2017/18 (academic)	2,573	2,667
2018/19 (academic)	2,296	2,402
2019/20 (academic)	2,119	2,273
2020/21 (academic)	2,016	2,188
2021/22 (academic)	2,216	2,274
2022/23 (academic)	2,344	2,310
2023/24 (academic)	2,366	2,253

Source: LG Inform

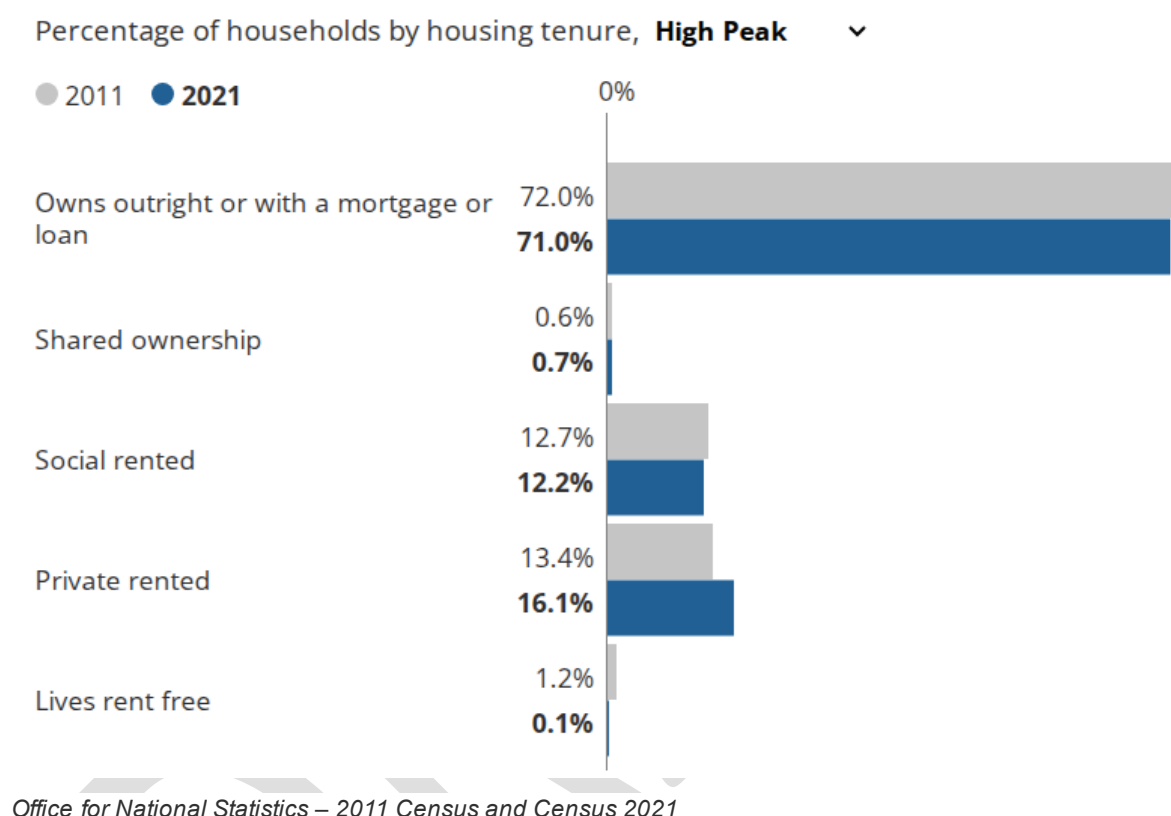
Development of new employment sites

Employment Land Delivery table

Specific development challenges also include a lack of good quality small to medium-sized industrial premises, which suppresses demand (particularly in terms of local business expansion), while low land values also challenge the viability of new developments (e.g. empty heritage buildings).

Housing

According to the 2021 census 71% people owned their own home (either outright or with a mortgage) which is above the England average of 61.3% although it had fallen from the 2011 figure of 72%. The number of residents in social or private rented accommodation at 28.3% was well below the England average of 37.7%.



The main accommodation type of whole house or bungalow at 87.6% was above the England figure of 77.4%. Flats, maisonettes or apartment formed only 12.1% of the accommodation compared to 22.2% in England. Single family households are just above the England average, 64.7% in High Peak compared to 63% in England. One person households account for 31.7% of the households with 30.1% in England.

High Peak has the second highest median house price to median salary ratio in 2023 at 7.4. The highest in Derbyshire was Derbyshire Dales at 9.1 whilst in England and Wales the ratio is 8.174. The higher the ratio the greater the proportion of the salary required to buy a property.

The delivery of new homes in the High Peak is below target. Housing delivery over the last 10 years against a local plan target of 350 per annum is as follows (blue font illustrates years the housing completions exceeded the target):

Monitoring Period	Housing Completions (outside PDNPA area)	Affordable Housing Completions
14/15	100	-
15/16	160	-
16/17	330	49
17/18	498	44
18/19	380	118
19/20	305	23
20/21	249	45
21/22	387	157
22/23	426	108
23/24	268	49
TOTAL	3,103	593

Town Centres

Despite rising rates of vacant units in four of the five main town centres, In October 2021 towns in High Peak had an overall shop occupancy rate above the national average for the high street at 91% compared to the UK average of 88.2% and an East Midlands average of 88.4%.

UK Shared Prosperity Funding is being invested in further town centre and high street improvements (incl. local markets and retail infrastructure), cultural events and activities together with a tourism campaign and support for tourism/ visitor economy businesses.

Buxton (pop. 20,048) is the principal town in the district. It is a traditional market and spa town, surrounded by the Peak District National Park, with a strong sense of identity and stunning Georgian and Victoria architecture and ornamental gardens. The town is also a recognised centre for arts and culture, largely due to the world renowned Frank Mitcham Opera House and the annual International Festival which takes place in July, accompanied by a Festival Fringe, many of whom then travel to Edinburgh.

Buxton received £6.6M of Future High Street funding to renew and reshape the town centre and ensure future sustainability by reducing reliance upon retail. Buxton was eligible for the funding due to the high level of retail vacancies along the high street. The Revitalising

Buxton development seeks to diversify the housing offer with a market-shaping scheme that meets the needs and expectations of residents, both existing and prospective. Further, it will provide contemporary office space and civic facilities in the centre of town as well as introduce new uses including leisure and hospitality to support a thriving nighttime economy. In addition, £1.2M of High Street Heritage Action Zone funds secured through Historic England were used to improve shop fronts and listed buildings on the high street, restoring heritage and architectural features. The funding levered in private sector investment as the grant funding contributed ~30% towards the cost of the work and property owners funding the remainder.

Glossop (pop. 17,825) is a thriving market town nestled at the foot of the famous Snake and Woodhead passes. The oldest part of the town dates back to the 12th century and has a listed market cross. The prosperity of the town was based on the cotton industry of the 19th and 20th centuries with many of the historic mill buildings now imaginatively converted into shops, pubs, hotels and residential

The Council is leading a multi-million pound transformation to rejuvenate Glossop Hall's which will see the historic buildings remain at the heart of the town centre. The work was funded by the Council with a £2 million grant contribution from the D2N2 Local Enterprise Partnership (now transitioned into East Midlands Combined County Authority) via their Getting Building Fund. There will be new business opportunities, including for creatives and entrepreneurs, as well as new food and drink, leisure and socialising spaces, and places for community use.

New Mills (pop. 9,197) is the smallest of the main towns, based on the Rivers Goyt and Sett and has an industrial nature having grown initially for its coal mining and then cotton spinning, bleaching and calico printing due to the close proximity to running water. It is now the home of the famous sweet manufacturer Swizzels Matlow. Whilst its industrial roots are evident the town is 'on the up' and is becoming ever more popular as a destination with a thriving High Street and places to dine and drink.

Chapel-en-le-Frith (pop. 7,139) is a historic market town often called "the capital of the Peak". It boasts a traditional marketplace, with listed 18th century stocks. The name means "chapel in the forest", and the Church of Thomas Beckett was built on the original Norman site and was a notable site in the Civil War. The town has a rich industrial heritage, manufacturer Ferodo was started here, and the town also has its own Theatre company, The Chapel Players.

Whaley Bridge (pop. 6,317) is known as the “Gateway to the Goyt Valley” and is a charming tourist destination for outdoor lovers. It has a rich history with evidence of inhabitation dating back to the bronze age. The town has connections with the industrial revolution with the canal part of the network used to transfer goods from the local cotton mills and quarries. The Grade II* transhipment warehouse in the canal basin is still there today whilst the Scheduled Ancient Monument Bugsworth Basin is only a short walk. The listed Colliery Air shaft Tower also shows the town’s industrial heritage. Today Whaley Bridge boasts a range of independent shops and regular markets and hosts a range of cultural events including Whaley Water Weekend.

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2. National, Regional and Local Strategic Context

The strategic plans and initiatives operating at the national, regional and local scales that this Growth Strategy must support are described below.

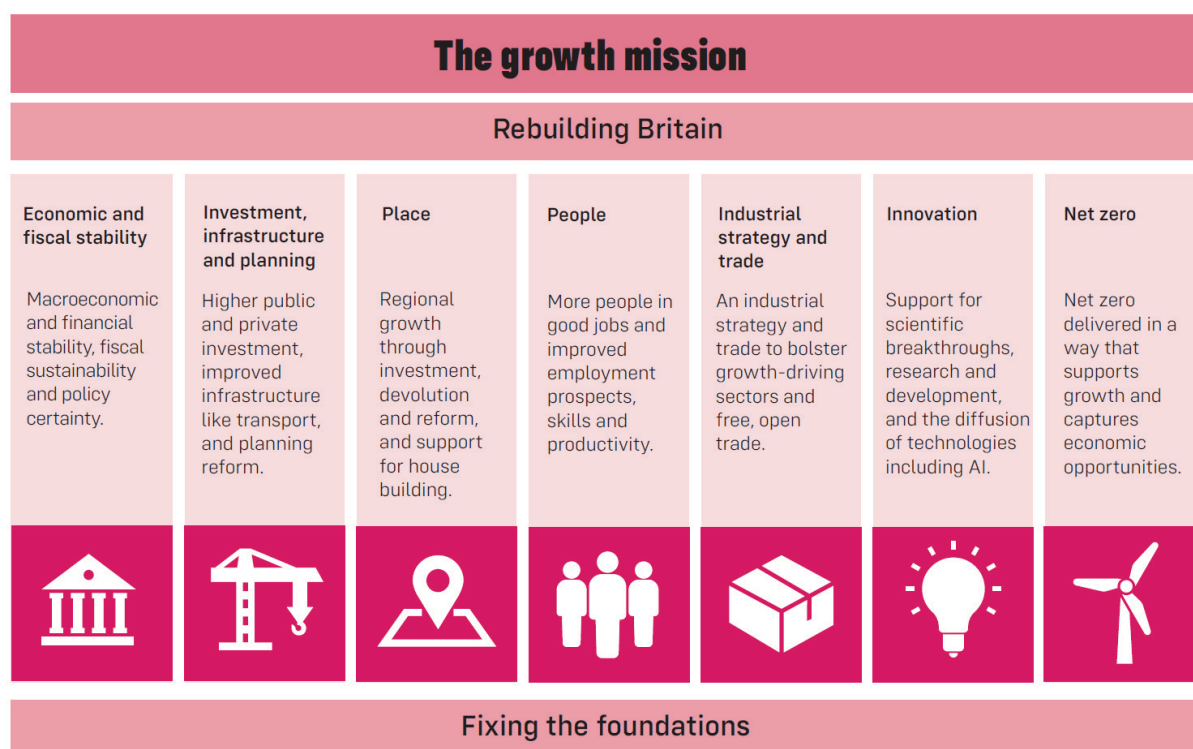
National Policy Context

The UK Government is pursuing five core 'missions', through which it aims to deliver a decade of national renewal. In December 2024 the Government published *PLAN FOR CHANGE: Milestones for mission-led government* which set out how the Government intends to deliver these missions in the life of the current parliament. A number of these missions / milestones inform this strategy.

Mission 1

Kickstart economic growth. Through this growth mission, the Government will aim for the highest sustained growth in the G7 – with more people in good jobs, higher living standards and productivity growth in every part of the United Kingdom.

Economic growth is the number one mission for the Government as growth will fund public services, enable investment in hospitals and schools, and, most importantly, raise living standards for everyone.



PLAN FOR CHANGE: Milestones for mission-led government 2024

Through the growth mission, the Government will deliver a milestone of higher living standards in every part of the United Kingdom by the end of the Parliament by:

Deliver growth by working in partnership with businesses. Creating the right conditions for investment through the 10-year Industrial Strategy *Invest 2035: Modern Industrial Strategy – National Industrial Strategy* (published in Spring 2025).

Ensure every nation and region realises its full potential. Working with the devolved governments and partnering with regional mayors to develop local growth plans, giving them the tools they need in areas like adult education, skills and employment support. The Government published the *English Devolution White Paper: Power and Partnership: Foundations for Growth* in December 2024. This set the plans for widening and deepening devolution in England with universal coverage of Strategic Authorities.

Drive innovation, investment and the adoption of technology to seize the opportunities of a future economy, from artificial intelligence to net zero. Promoting innovation and harness the full potential of the UK's science base, protecting funding for research and development. Delivering an *Artificial Intelligence Opportunities Action Plan* which will set out how the benefits of the fourth industrial revolution which artificial intelligence will be realised

Help people get a job, stay in work and progress in their careers, with good employment opportunities across the country. Through Skills England and the Industrial Strategy Council, along with a reformed jobs and career service, the Government will help more people to seize the opportunities of employment, helping them overcome the challenges of ill-health-related inactivity and other barriers to work through the actions set out in the [Get Britain Working White Paper](#).

Through the growth mission, the Government has set an ambitious milestone of **building 1.5 million safe and decent homes in England** this Parliament. It is also reforming the planning system so that it is pro-growth and pro-infrastructure.

A new [National Planning Policy Framework](#) was published in December 2024 and an update all relevant National Policy Statements is proposed by Summer 2025. The new NPPF included the reintroduction of mandatory and increased housing targets for local authorities and restoration of the five-year land supply rules.

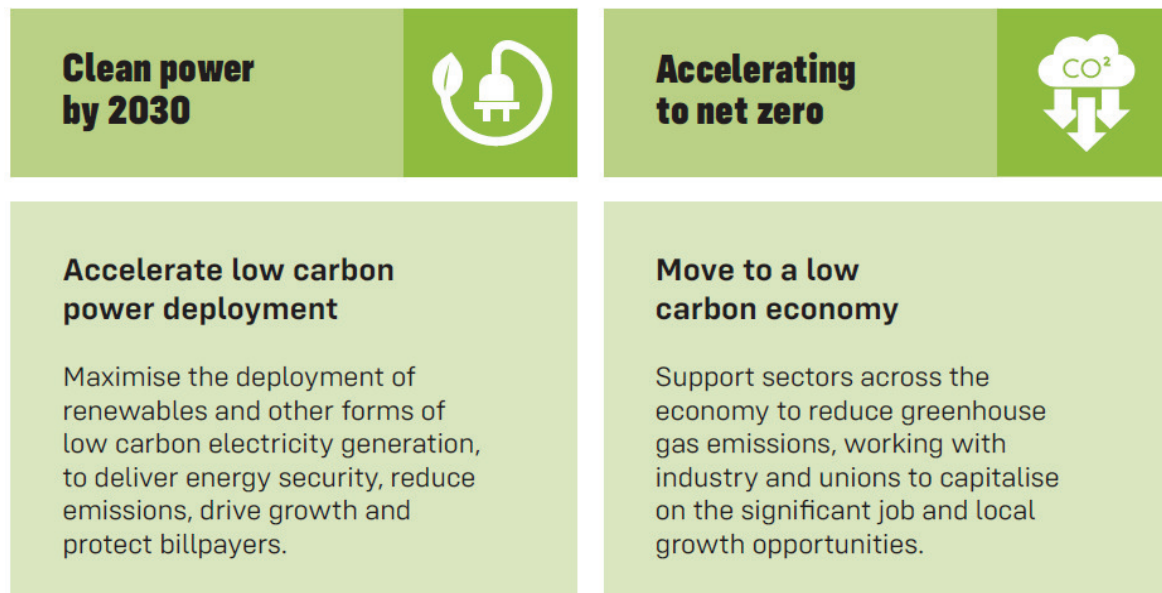
The Government also intends to make improvements to planning at a local level, modernising planning committees and increasing local planning capacity. The [Planning and Infrastructure Bill](#) will streamline processes for critical infrastructure. It is intended to strategically join up decisions on housing, business growth and infrastructure at both a national and local level, with the Westminster government's industrial, housing and infrastructure strategies aligning with the local growth plans and strategic development plans led by regional mayors.

The Government intends to increase supply and deliver the biggest boost to social and affordable housing in a generation, ensuring the benefits of housebuilding are felt by those on lower incomes. In the [Autumn 2024 Budget](#) the Government allocated an additional £500 million in the Affordable Homes Programme, taking its annual budget to £3.1 billion next year.

[Mission 2](#)

Make Britain a clean energy superpower. The Government has committed to reducing domestic and commercial energy bills, creating additional employment opportunities in the green energy sector and strengthening national energy security through a transition to zero carbon electricity and achieving net zero emissions.

It is intended to achieve this mission through delivering clean power by 2030 and accelerating to net zero. The mission is intended to ensure energy security, protect billpayers, create good jobs and help to protect future generations from the cost of climate breakdown.



Source: PLAN FOR CHANGE: Milestones for mission-led government 2024

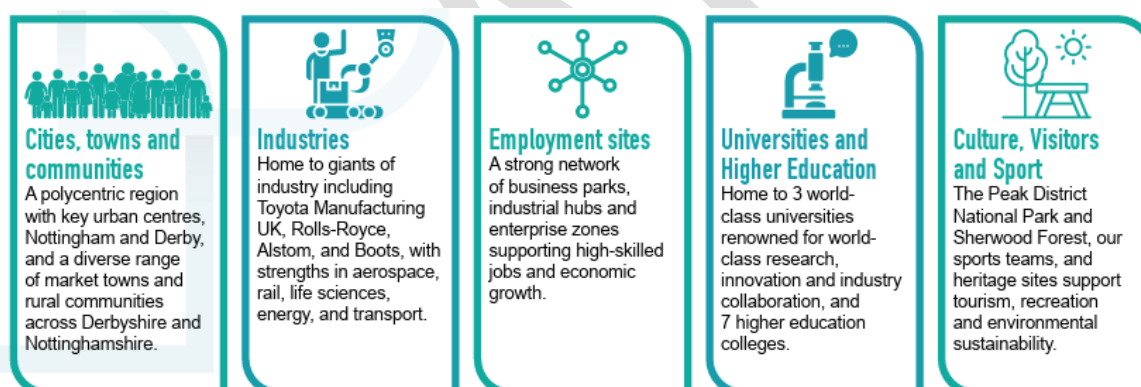
Regional Strategic Context

East Midlands Devolution

Following the East Midlands devolution deal agreed in 2022, Derbyshire, Nottinghamshire, Derby City and Nottingham City are now part of a new combined authority, the East Midlands Combined County Authority (EMCCA). The combined authority gives the East Midlands the opportunity to develop major infrastructure and reverse historic under-investment to help improve the region's economy and improve outcomes for its residents.

With a population approaching 2.3 million and a geography covering nearly 5,000 square kilometres, the region offers a unique balance of Cities, towns and communities. A polycentric region with key urban centres, Nottingham and Derby, and a diverse range of market towns and rural communities. Industries, urban innovation and rural.

EMCCA identifies some key features of the region:



EMCCA has now developed a comprehensive set of investment priorities aimed at creating jobs, growing businesses and infrastructure improvements across the region. The focus is transport, infrastructure development, housing, delivering on Net Zero goals and economic development.

Transport

EMCCA aims to transform transport opportunities for all those who live, work or visit the region. This will be achieved by:

- Upgrading the quality of the road network and delivering improvements to local rail, bus and active travel services

- Promoting the use of electric cars
- Investing in better transport connections across the region
- Building on our strong reputation for transport innovation to give the East Midlands greater influence in national and cross-regional transport decisions

Housing

EMCCA has been awarded an annual budget of over £16.8 million for brownfield land regeneration from the Department for Levelling Up, Housing, and Communities (DLUHC) and Homes England and aims to deliver up to 1,400 high-quality new homes by March 2026.

The vision is to create affordable, high-quality housing and enhance the quality of the existing housing stock.

Net Zero

EMCCA has committed to the region becoming carbon neutral by 2050 to help address the global climate crisis. The region will also become more sustainable, with improved green spaces, increased biodiversity and high levels of energy efficiency by supporting:

- Building new low carbon homes
- Retrofitting existing homes to increase energy efficiency
- Promoting the use of renewable energy
- Protecting and enhancing our green spaces

Economic Development / Skills and Adult Education

The combined authority aims to attract more public and private investment to the East Midlands to boost the local economy and enhance the quality of life for residents. There will be numerous opportunities for businesses looking for a dynamic regional economy that offers substantial growth potential.

In addition, there will be opportunities for residents and young people to improve their personal and professional growth, by developing skills to remove barriers, and to progress into good and highly skilled jobs or apprenticeships.

The goal is to foster a dynamic talent pool that can adapt to the growing demands of local businesses. The region has the potential to build on its existing knowledge base in

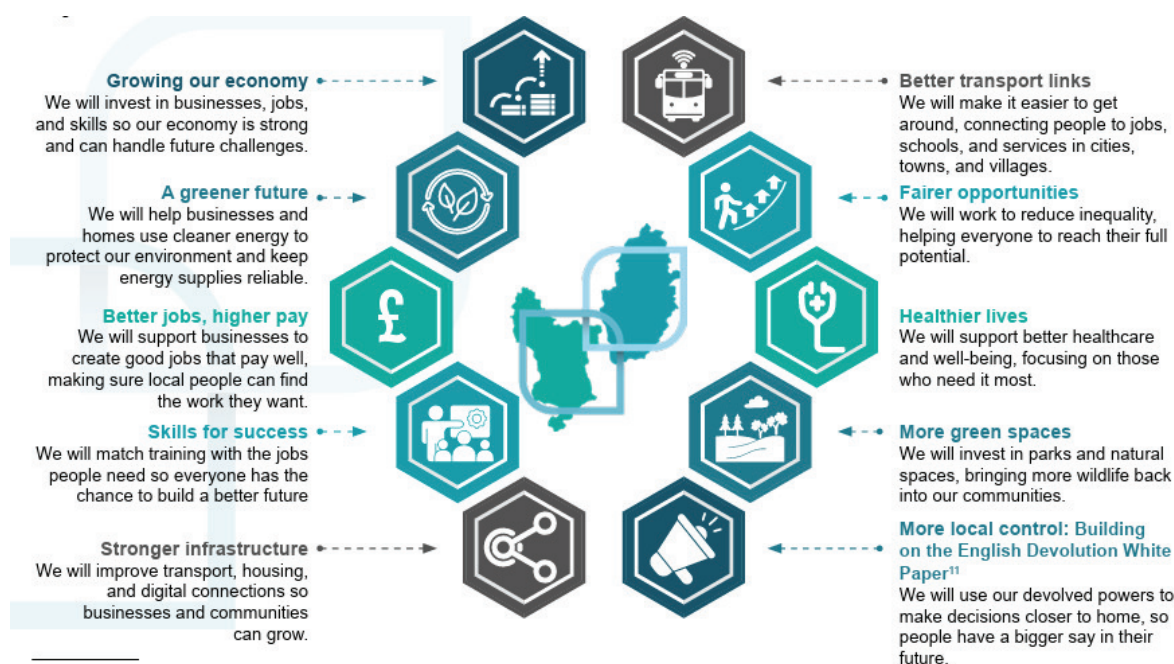
research, energy, life sciences, and advanced manufacturing, to take full advantage of future opportunities.

Inclusive Growth Commission

The Inclusive Growth Commission (IGC) is an initiative delivered in partnership between the East Midlands Combined County Authority (EMCCA) and the Royal Society for Arts, Manufactures and Commerce (RSA). This has been launched to take a systems level approach to developing recommendations for a set of long-term, strategic goals across economic, social and natural systems – and recommendations for short- and longer-term steps partners in the area could take to deliver against them. In turn, the Commission's recommendations will inform an Inclusive Growth Strategy for the East Midlands that offers a long-term plan for people who live, work and study there the opportunity to fulfil their potential. To achieve this, the IGC will consist of four phases:

- Phase One (set-up and launch) - Terms of Reference and project scope for the Commission have been developed, which includes key aims, potential activities, and the division of responsibilities across key stakeholders. This phase took place from August to October 2024.
- Phase Two (building the evidence base and interim findings) compiled detailed evidence around assets, challenges and opportunities for the region, alongside insights from key local leaders, experts and communities to supplement the desk based work. The evidence was used to shape a set of early recommendations that were contained in an interim report. The work informed EMCCA submissions to the Spring 2025 spending review. This phase took place from October 2024 and the interim report was produced in March 2025.
- Phase Three (defining success and how it can be delivered) will build on Phase 2 to establish a compelling long-term vision for the region, underpinned by a proposed set of evidence-based and measurable goals and delivery propositions for the region and its partners to take forward. These will be developed in partnership with key stakeholders, investors and residents. This phase is timed to factor in the outcomes from multi-year funding picture set out in the Spring 2025 spending review. It will take place from March to July 2025.
- Phase four (final report and post-report handover) will consist of writing up the final report and handing over assets for external use with key stakeholders and partners. This phase will take place in between July and September 2025.

EMCCA has identified ten objectives for inclusive growth that will act as a guide:



Deepening Devolution

The new devolution framework as set out in the English Devolution White Papers sets out the functions for each of the levels of Strategic Authority. Areas that have or agree to take on a mayor will see major benefits including:

- Prioritisation by the Government to agree and establish devolution in their area.
- Powers drawn down from the strengthened Devolution Framework, with a significant devolution offer that will continue to grow over time.
- A clear pathway to unlocking higher levels of devolution reserved for the most mature institutions, including access to the Integrated Settlement which will grow in scope over time.
- Flexible allocated funding, with a long-term investment fund and, once the area has qualified, funding granted through a flexible Integrated Settlement.
- A representative sitting round the table of the Council of Nations and Regions with the Prime Minister, First Ministers from all the Devolved Governments and the Deputy First Minister of Northern Ireland.
- A representative on the Mayoral Council to work with the Deputy Prime Minister on developing devolution and local growth policy.
- A mandate to develop a Local Growth Plan, with local growth priorities agreed with the Government providing focus for central government and regional collaboration.
- Membership of the Mayoral Data Council to join up senior data leaders with central government decision-making on data issues that affect them.

To enable effective working with the public, private and voluntary sectors, the Government will explore a wide-ranging legal power for Strategic Authorities to deliver in their areas of competence. The Government will also explore enabling Mayors to promote economic, social, and environmental aims and convene stakeholders with a corresponding duty on public authorities to respond. It would go hand in hand with a duty to collaborate with constituent Local Authorities and neighbouring Strategic Authorities in delivering their areas of competence.

Established Mayoral Strategic Authorities will be able to propose, individually or with others, additional functions to be added to the statutory Devolution Framework, or piloted locally, to deliver their areas of competence. The mechanism of requesting further powers is intended to drive innovation and testing to ensure areas continue to trailblaze. This will be an annual process ahead of fiscal events. Proposals will be discussed at the Mayoral Council and then Established Mayoral Strategic Authorities will be invited to submit a written proposal formally, to which the Government will have a duty to respond. Successful pilots will be considered for addition to the framework.

Peak Partnership Summit

It is important to note that High Peak's economic interests do not align precisely with the East Midlands. For example, our major transport infrastructure connects Greater Manchester and South Yorkshire. This will continue to present opportunities for growth in the High Peak. The Council currently works to ensure that these opportunities are recognised and explored by EMCCA, and it is essential that the council continues to recognise this potential and works to support any opportunities.

In March 2025, Mayor of the East Midlands Claire Ward invited Greater Manchester Mayor Andy Burnham and South Yorkshire Mayor Oliver Coppard to join a Peak Partnership Summit to work in the service of the Peak District and its future.

Recognising that whilst the Peak District is located predominately in Derbyshire, parts of it stretch into Greater Manchester and South Yorkshire, with people living, working and travelling between the regions on a daily basis. Mayor Claire is keen to work across the three regions to tackle issues and realise the opportunities the Peak District, and its surrounding towns and villages, presents. She has called for a Peak Partnership Summit to be held in the coming months to speak about these shared goals, in particular highlighting:

- Productive partnership with the Peak District National Park: focusing on spatial planning, futureproofing, and tourism.
- Securing the future of Snake Pass: focusing on infrastructure investment and climate adaptation.
- Strengthening connectivity between regions: building shared approaches to transport investment to ensure that people who live, work, and play in the Peak District can benefit from improved public transport, better roads, and active travel links.

Local Visitor Economy Partnership (LVEP)

Visit Peak District, and Derbyshire was successful in its joint application with Derby City to become a Local Visitor Economy Partnership (LVEP) and the new Peak District, Derbyshire and Derby City LVEP Board was established in October 2023.

The visitor economy is a key sector within Derbyshire, estimated to generate £1.9 billion and attracting 35 million visitors annually (STEAM data. 2021). This sector was disproportionately impacted by the global pandemic, and although one of the slowest sectors to recover now shows an improving situation with visitor numbers very near pre-pandemic levels. The work of VPDD will be important in providing the support necessary to ensure the sector continues to growth and strengthen. The tourism recovery plan will be based on the following strategic priorities:

1. Boost domestic tourism to the Peak District and Derbyshire
2. Position the Peak District and Derbyshire as a destination for the corporate sector
3. Support businesses to rebuild and grow
4. Rebuild international connectivity and grow inbound tourism
5. Become a destination for active travel and transport connectivity
6. Lead the way with sustainable tourism
7. Bid to become a Tourism Zone
8. Promote the sector as a place to be proud to work within
9. Work with partners to revitalise market towns
10. Support local authority partners to deliver their Tourism Strategies

Invest in Derbyshire

Invest in Derbyshire is the Inward Investment Agency for Derbyshire whose aim is to welcome inward investment alongside a thriving indigenous business base to make a significant contribution to our economy through job creation, innovation, research and development.

Derbyshire has a strong and diverse economy, with many large international corporations supported by a thriving SME and entrepreneurial culture. There are numerous opportunities for businesses to survive and thrive in the county, especially since the county offers an attractive base in which to live, work, and invest.

Invest in Derbyshire considers High Peak as a highly skilled area with affluent market towns. Food and drink manufacturing, biopharma and quarrying are the key drivers in the area whilst clusters of creative industries also provide opportunities for office and creative workspaces.

Local Strategic Context

High Peak Borough Plan 2023 – 2027

At the local level, the Growth Strategy aligns closely with the Council's Borough Plan, 2023-27. The Growth Strategy will provide the strategic framework to develop High Peak as a thriving borough. It will focus on delivering the Borough Aim 3 'to protect and create jobs by supporting economic growth, development and regeneration.'

The key focus of the strategy will be to improve the quality of life for local people by supporting business growth, creating flourishing town centres and thriving high streets, promoting tourism for local benefit, facilitating housing delivery and addressing economic inequality. The Growth Strategy will also align with the Council's Climate Change Action Plan to promote the growth of a carbon neutral economy.

High Peak Local Plan

The High Peak Local Plan which was adopted in 2016, provides the planning framework to support new housing and commercial development across the borough. The 2016 plan is under review. The timetable for the review is as follows:

Early engagement	January-March 2023
Preferred Options consultation	Spring 2025
Proposed Submission consultation	Winter 2025
Submission of Local Plan	Spring 2026
Examination	Summer 2026
Adoption	Autumn 2026

The 2016 plan determined a housing requirement of 350 dwellings per annum or 7,000 over the plan period 2011-2031. This has now been superseded by the National Planning Policy Framework of December 2024 which has almost doubled the housing target, to 553 dwellings per annum. This figure is based on the current number of dwellings plus an annual growth rate plus an additional multiplier based on the ratio of house prices to workplace earnings.

Consequently, the latest Statement of Five-Year Housing Land Supply as at 1st April 2025 shows that at 2.85 years the Council cannot demonstrate a 5-year land supply. The new Local Plan will need to address both this larger housing requirement and the under delivery over the current plan period to date.

The impact of the new housing requirements results in a significant increase in the number of dwellings that will be required over the new Local Plan period illustrated as follows:

	2020 Local Plan Requirement	Previous Standard Method	New Standard Method
Annual requirement	350	243	553
5-year requirement	1,750	1,215	2,765
Plan Period requirement (18 Years)	6,300	4,374	9,954

Work will also be required to quantify the demographic impact of the additional dwellings to ensure that other aspects of the Plan, such as employment land, supporting services and infrastructure reflect the predicted population. In particular a high-quality housing stock is also crucial to attracting and retaining employers

The Local Plan also reflects other strategies and policies where they have a spatial component and can guide the distribution of development. The Growth Strategy will influence and align with the Local Plan and identify strategic development sites, both for housing and commercial development.

The 2016 plan area is divided into three sub areas that each have their own characteristics and features:

- Glossopdale
- Central Area
- Buxton

The definition of these sub-areas is based upon a number of factors such as labour and housing market areas, transport links, relationship to neighbouring areas and the boundaries of Parishes and the Peak District National Park. The location of each is shown below:



High Peak Local Plan 2016

Given the location of the High Peak and its proximity to not only the Peak Park boundary but also Greater Manchester, South Yorkshire, Cheshire and Derbyshire Dales, these sub-areas will still be relevant when the Local Plan is reviewed.

The 2016 plan stated that new commercial developments will primarily be focused on designated employment sites in close proximity to other employment premises, since they provide better infrastructure and services for employers and have less impact on residential amenity. Nevertheless, to encourage economic growth, business and industrial developments will be supported elsewhere within the built-up-area, subject to the impact of the proposal on the local area.

The 2016 plan allocated 45ha of land for new commercial uses over the plan period.

Government has now introduced a new sub-category of Green Belt in its update to the National Planning Policy Framework, Dec 2024. This 'grey belt' definition reflects the Governments belief that some Councils have sought to protect poor quality green belt land, unnecessarily hindering development and thereby economic growth. The definition of grey belt includes all lawfully previously developed land not used for agricultural buildings within the green belt, and any area of land that does not strongly contribute to three of the five purposes of land within the green belt. The new local plan will need to be supported by a revised Green Belt assessment that considers this new definition of Grey Belt land.

High Peak Tourism Strategy

Linked to the Growth Strategy is the High Peak Tourism Strategy, approved in February 2023, which sets out a refreshed vision for driving a sustainable and innovative visitor economy.

The Strategy identifies the Council's vision, key priorities for growth and the action plan for tourism delivery in the High Peak over the next five years.

During this time the High Peak will establish itself as a coherent, connected destination within the iconic Peak District brand. The strategy will help the Council to capture new markets, use the area's cultural and natural assets to fuel growth and capitalise on staycations and people's desire to escape to "the great outdoors".

The four key priorities identified for growth in the strategy are:

- Towns & Villages – creating destination hubs and reasons to linger
- Cycles and Walking – developing routes, trails, packages and events.
- Creators and Makers – supporting events, workshops, courses and opportunities to buy
- Accommodation – extending the range and type

The visitor economy is an important piece of the jigsaw in creating a thriving local economy. Under the term 'visitor economy' there are essentially two types of visitor – those who visit for the day, and those who stay overnight (and potentially into multiple overnights).

Whilst both are important in contributing to the local economy, overnight staying visitors have the most impact as their expenditure levels tend to be much higher through accommodation, eating out etc.

Businesses who operate within the visitor economy sector utilise other local businesses and their goods and services as part of their supply chain.

Financial Sustainability

There is a direct link between housing and business growth and the Council's long term financial sustainability. The direct financial benefits of a sustainable growth strategy are:

- Council Tax Income – council tax revenue increases in proportion to the growth in the number of residential units. Delivery of the housing target in the refreshed Local Plan would result in additional council tax income of more than £500,000 over a ten-year period.
- Business rates income – development of new business premises results in increased business rates. Development of a new business property with a rateable value of £100,000 (equivalent to a 60-room hotel) would generate in excess of £500,000 over a ten-year period, a significant proportion of which would be retained locally through the business rates retention scheme.
- Growth Incentive Grants – the current New Homes Bonus is a grant paid by central government to local councils to incentivise housing growth. It is based on the increase in effective housing stock including new builds, conversions and long-term empty homes brought back into use and provision of affordable housing. Delivering the housing targets in the refreshed plan would result in c£35,000 per annum in new homes bonus grant.

3. Challenges and Opportunities

It can be seen therefore that there are a number of challenges which need to be addressed and opportunities built upon, in order to secure future growth in the High Peak:

Challenges

- The national economy currently presents challenging conditions for local economic growth.
- The local economy has experienced lower levels of business growth than the national average, evidenced by the business start-up rate being comparatively low.
- Housing delivery is falling short of delivery targets and the new targets in the NPPF will provide a significant challenge.
- The population has not increased yet the proportion of people aged 65 to 74 rose by 28.4%
- Changing patterns of consumer and retailer behaviour are having a negative impact on footfall in town centres, threatening the longer-term viability of those centres.
- The aim of becoming a carbon neutral borough will require significant adaptation in housing and commercial developments and in business, workforce, consumer and visitor behaviour.
- High Peak workplace earnings are comparatively low despite residents' earnings being above average regionally.
- Productivity levels are comparatively low.
- There is a limited supply of employment land that is available for immediate development including a lack of good quality small to medium sized industrial premises and start-up or Enterprise facilities.

Opportunities

- The successful devolution creation of EMCCA will provide additional local investment and the opportunity to work more closely with partners to facilitate inward investment.
- Re-orientating the local economy towards higher-value growth through business support and skills investment, will attract and retain a skilled workforce, increase the number of residents with level 3 and 4 qualifications and help reduce the economic inactivity rate.
- Innovative land use allocations can support business expansion.

- The vitality and viability of town centres can be improved through place making investment, including developing and enhancing the leisure-based offer.
- Strengthening High Peak as a visitor destination and base for longer staycations to explore the Peak District will attract more overnight visitors.
- Building relationships with partner organisations, businesses, developers and landowners will facilitate sensitive new employment and residential development.
- Promoting High Peak's affordable and quality of life offer and potential to hybrid or remote work will attract entrepreneurs and skilled workers to the area.
- Ensuring local benefits of major developments are maximised through procurement of social value.
- Proactively promoting the use of surplus land or stalled sites to facilitate new development
- Promoting High Peak as a great place to live or to start or to grow a business due to its central location, established business base, workforce catchment, competitive cost location, high quality housing and access to leisure facilities.

4 Principles

In pursuing the economic growth objectives outlined in this strategy, the Council will be guided by four overarching principles:

Inclusive Growth

The Council is keen to support economic growth that creates opportunities for all segments of the population and distributes the dividends of increased prosperity fairly across society. This means creating an economic climate where any generated wealth remains in the local economy. The Council will commit to working with representatives of specific localities to achieve this goal by focusing on:

- Exploring potential opportunities for community-based wealth generation including supporting the development of community-owned and social enterprises.
- Working with developers to ensure major regeneration projects are delivered in line with community wealth building principles.
- Targeting business development funding within local communities to foster entrepreneurship.

Green Growth

Future economic growth must be clean and resilient and high carbon emission industries must be supported to transition to low emissions using green technology, skills and jobs. The decisions made at a local and individual level must enable the local community and businesses to make low-carbon choices, even during the ongoing cost of living crisis.

The Council is keen to help create the conditions for environmentally sustainable economic growth across the borough. Such growth can have a crucial role in creating a more inclusive local economy by fostering sustainability, creating more highly skilled, better-paid job opportunities and ensuring that the benefits of economic development are shared across communities:

- Green growth promotes the development of renewable energy industries, sustainable agriculture, and energy-efficient construction. These sectors offer a range of job opportunities that can be accessible to diverse segments of the population, including

lower-skilled workers, but also create higher-skilled opportunities to raise employment aspirations and income levels, boost skills provision and improve more people's standard of living.

- Harnessing the benefits of green growth will ensure that local businesses and organisations are well positioned and equipped to compete in this expanding marketplace. Developing a compelling green economic offer will attract businesses to the area, create sustainable supply chains and mutually beneficial sectoral clusters.

Design / Heritage / Natural Environment

The Council is committed to supporting high quality and inclusive design for all developments. Well-designed developments can enhance the sense of place and identity of an area and can bring significant benefits to the local environment and economy. The Council's Local Plan will continue to provide for high standards of quality and design in development principles. The outstanding environmental value and wealth of historic or archaeological assets within the High Peak must be provided for in all development proposals.

The authority's Plan for Nature 2024, adopted on 3rd December 2024, sets out key actions to support the recovery of nature across the Borough, including the creation, restoration and connection of habitats. The Council will work to ensure that nature and biodiversity are considered throughout all of its operations and the delivery of biodiversity net gain in planning provides the best outcomes for nature.

Sustainability

EMCCA's baseline Local Growth Plan recognises that the region is home to fast growing opportunities at the intersection of digital and creative industries with sub-sectoral clusters in the High Peak. Jobs in this field tend to be highly productive, knowledge intensive and higher wage, hence growing businesses in this sector can help attract more of this type of job. Further, given some of the constraints in the High Peak including topography and proximity to a national park, knowledge-based jobs generally require less physical space (land) compared to industries like manufacturing or agriculture. This is because knowledge-based jobs often involve activities that can be done remotely or in smaller office spaces, relying more on intellectual capital and information rather than physical resources or extensive land

use. Hence growth of these sectors is important for the longer-term economic sustainability of the borough.

The Council will seek to achieve this by:

- Strengthening the relationship with further / higher education providers,
- Continuing to promote opportunities for skills development of the existing workforce whilst working to ensure skills provision evolves in line with future job requirements.
- Promotional campaigns to attract inward investors and entrepreneurs to the area.
- Developing more start up and entrepreneurial space as well as exploring space for the expansion of established industries / businesses
- Focusing on securing high-value growth to improve productivity .

The Council will ensure that growth and development is focused on achieving the following benefits:

- *Capital Investment and Expenditure Benefits*: ensuring local benefit from the capital investment and expenditure generated by the construction industry on new housing and employment projects.
- *Construction Benefits*: ensuring the local economy benefits from the construction roles, income generation and economic output during the construction phase of developments, including through the supply chain and on employee services.
- *Resident Expenditure Benefits*: level of expenditure generated by residents of new housing development
- *Local Community Benefits*: financial contributions made by developers to fund new facilities, services and infrastructure for local communities through the s106 of CIF schemes.
- *Non-Fiscal Benefits*: this relates to other benefits that tend to be non-monetary such as the re-use of brownfield or contaminated land and protection and enhancement of public open spaces.

5 Missions and Ambitions

This Growth Strategy is focused on addressing two related ambitions:

- Working with developers to bring forward new quality housing sites to ensure that the High Peak is a sustainable location to live.
- Building a more resilient economy that can deliver a range of quality employment opportunities and ensure that local people have the right mix of skills to benefit from the new jobs which are created.

The Council has a lead role in local place making including addressing the wide range of issues that can make High Peak both a great place to live and a great place for business. The Council will prioritise resources on activities where it can genuinely add value and will work proactively in partnership with other organisations and the private sector to secure the best possible outcomes for the area.

Over the next three years, the Council will focus on six missions to facilitate growth in the borough:

Mission 1 - Accelerate Housing Delivery

This will be achieved by:

- Unlocking existing Local Plan site allocations
- Implementing a council scheme to mitigate nutrient neutrality
- Identifying potential new allocations
- Enhancing the approach for the delivery of affordable, social and supported housing delivery
- A proactive approach to ensuring that empty properties are brought back into use

Mission 2 - Increase Employment Growth

This will be achieved by:

- Unlocking existing Local Plan site allocations

- Identifying potential new allocations
- Developing an approach to redeveloping vacant premises and undeveloped brownfield land
- Recognising the need for high value growth

Mission 3 - Develop the Local Visitor Economy

This will be achieved by:

- Working with partners to deliver the High Peak Tourism Strategy
- Encouraging and facilitating new and more sustainable growth to enhance the local visitor economy

Mission 4 - Support and Diversify the Rural Economy

This will be achieved by:

- Working with communities to develop Neighbourhood Plans where appropriate
- Facilitating local regeneration schemes through local regeneration funding

Mission 5 - Further Regenerate Towns

This will be achieved by:

- The refresh / development of locality plans and town centre design guidelines that build on existing strengths
- Facilitating the development of a community-led approach through proactive engagement with community representatives
- Developing strong town centre partnerships including all representative stakeholders

Mission 6 - Support Business and the Development of Skills

This will be achieved by:

- Support small businesses and encourage new business start-ups
- Developing strong links with regional skills agencies and local providers
- Strengthening relationships with the borough's large employers to sustain their development

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6 Constraints

There are a number of constraints to attaining the required expansion of housing and employment sites. The Growth Strategy recognises these and will adopt a proactive role in the mitigation of them:

Local Transport Plan / Public Transport

The authority will work closely with Derbyshire County Council and EMCCA to ensure the Growth Strategy relates closely to their Transport Strategies. This will ensure the location of new housing and commercial developments actively contribute to carbon reduction targets and Net Zero by reducing reliance on the private car and providing public transport and active travel networks. Building new homes and employment space close to existing transport links is a key aspect of the solution to the climate crisis.

Green Infrastructure

High Peak contains extensive existing and potential green infrastructure assets that create connectivity between green spaces, provide green off-road routes for active travel, help to alleviate flooding through Sustainable Urban Drainage systems and help the borough adapt to climate change. The Growth Strategy will build upon the existing network to develop design standards for new development that considers green infrastructure from the outset and how any proposed development will connect to the wider network

Social Infrastructure

Community life is a strong and distinctive feature of High Peak. People identify closely with their towns, neighbourhoods and villages. Pride in local communities is high, leading to a rich pattern of community activities and organisations. Local parish councils, voluntary, 'Friends-of' and community groups play a vital part in maintaining the special characteristic of the borough. The Council continues to work with town and parish councils to strengthen its relationships with them. The retention and development of local services and community facilities in rural areas, such as village halls, local theatres and sports facilities are a priority for the Council.

Other Infrastructure

Development impacts on other infrastructure such as utilities (electricity, gas, water, sewage drainage etc.). Developers have the right to connect to the appropriate networks and utilities are held accountable for making sure connections take place in a timely and cost-effective manner. The utility providers have obligations to invest in strategic infrastructure to support development in line with national growth ambitions.

The Council will proactively engage with utility providers to ensure that any local challenges or concerns are recognised. This will include lobbying for improved broadband connections.

Developer Contributions

Any development, whether housing or commercial, will have an impact on the local infrastructure. The Council adopted a Developer Contributions SPD in October 2023 which provides detailed guidance on the contributions expected from developers to mitigate these impacts. The key areas of infrastructure that will be affected by most development schemes include:

- Affordable housing – covering first homes, calculating commuted sums, dwelling space standards, vacant building credit and rural exception sites.
- Open space, sport and recreation – sets out the requirements for different types of open space and outdoor and indoor sports facilities.
- Biodiversity and Green Infrastructure
- Retail and Town Centres
- Health
- Air Quality
- Training and Employment
- Transport Infrastructure including sustainable travel
- Education
- Climate Change – including water quality and efficiency, electric vehicle charging, flood protection, decentralised energy networks and sustainable design and construction

The Council will seek to continue to provide a flexible and creative approach to the use of developer contributions if it feels it will lead to a better outcome.

Land Supply

The topography of the High Peak and proximity to a national park presents particular challenges when allocating appropriate sites for housing and commercial development.

Although the Green Belt review will present wider development with the new grey belt designation, to ensure that adequate proposals come forward for development, the Council will take a proactive approach including:

- Proactive intervention in growth and development schemes such as acquiring land, finding and investing in assets.
- Working with neighbouring authorities to create a complementary offer and to take a sub-regional approach
- Exploring the opportunities for long-term growth and community benefit of its own assets.

Inward Investment

The Council will develop a new approach to attracting inward investment into the High Peak. This will include:

- Marketing the opportunities for potential investors and developers
- Proactive place marketing detailing the attractiveness of the High Peak as a location to live, work and visit
- Working with local stakeholders and strategic partners to secure future investment and development

7 Interventions

The Council has taken several actions in recent years to facilitate growth in the High Peak. These interventions will be strengthened and expanded upon to include:

Housing

Accelerated Housing Delivery Plan (AHDP)

The AHDP was adopted in April 2016 as a mechanism for the accelerated delivery of housing on council owned land. The AHDP needs to be refreshed to determine the best way to deliver affordable housing on the following sites:

- Paradise Street, Hadfield
- Adderley Place, Glossop
- Roughfields (Padfield Main Road), Hadfield
- Melandra Castle Road, Gamesley
- Market Street, Buxton
- Granby Road B, Buxton

Housing Infrastructure Fund (HIF)

A grant from Homes England was received to construct the infrastructure required to develop housing at Buxton. The Growth Strategy needs to ensure that these sites are delivered:

- Waterswallows, Buxton
- Hogshaw, Buxton

Future High Streets Fund (FHSF)

The Revitalising Buxton development will diversify the housing market in addition to providing contemporary office space and civic facilities as well as introduce new uses including leisure and hospitality to support a thriving nighttime economy.

Affordable and Supported Housing

A strategic review of options to increase the supply of affordable housing in the borough will be implemented. The review will consider the following:

- Developing a clear strategy with prioritised objectives that can be understood by stakeholders and partners
- Better use of resources and assets to determine land availability, internal or external funding opportunities and the use of legal powers to help leverage of additional grant aid or to increase the pace of the development
- Considering how innovation and flexibility can be used to increase the rate and scale of development
- Identifying opportunities for working with other local authorities, housing associations or other potential partners
- Understanding the opportunities, risk appetite and preferred level of involvement in any proposed options or measures

Interventions that will be undertaken on Local Plan allocations as part of the Growth Strategy will include:

- Bidding for funding and investment for relevant infrastructure or viability gaps as and when appropriate
- Approaching landowners to look at steps to promote delivery and provide support and guidance

Empty Properties

The Council also has an Empty Property Strategy which facilitates a proactive approach to ensuring that empty properties are brought back into use to reduce the housing list and to support community cohesion.

Strategic Allocations / Local Plan Review

The Local Plan will undertake a fundamental review of the strategic allocations for both housing and commercial development to ensure sites are allocated that are deliverable:

Glossopdale

Woods Mill, Glossop

Former Dinting Railway Museum and land off Dinting Road, Glossop

Charlestown Works, Charlestown Road, Glossop

Adderley Place, Glossop

Former Ferro Alloys site, Glossop

Roughfields, Hadfield
North Road, Glossop

Central Area

Land off Derby Road, New Mills
Land at Ollersett Lane/Pingot Road/Laneside Road New Mills
Britannia Mill, Buxworth
Bingswood, Whaley Bridge
Furness Vale Business Park, Calico Lane, Furness Vale
Torr Vale Mill, New Mills
Newtown, New Mills
Birch Vale Industrial Estate
South of Macclesfield Road Whaley Bridge

Buxton Area

Land at Hogshaw
Land west of Tongue Lane, Fairfield, Buxton
Land off Dukes Drive, Buxton
Land off Ashbourne Road and Foxlow Farm, Buxton
Tongue Lane (land south of Tongue Lane Industrial Estate), Buxton
Station Road and Spring Gardens Regeneration Area, Buxton
Market Street Depot

The review of the Local Plan will also focus on:

- Evidence gathering
- Design standards
- Carbon reduction and nature recovery targets
- Review of all existing allocated sites (in addition to strategic sites) and potential for delivery

Neighbourhood Plans

Only Chapel-en-le frith and Whaley Bridge have adopted neighbourhood plans. The Growth Strategy will encourage and support other eligible neighbourhood areas to prepare plans including:

- Chinley, Buxworth and Brownside
- Hayfield
- Buxton

Town Centre Regeneration

Revitalising Buxton

The council is currently implementing the Future High Street Fund project, Revitalising Buxton, which is based around the Springs shopping centre, alongside the development partner Capital&Centric. Housing, leisure, food and beverage and independent retail will be provided on the site to reinvigorate the town centre. Completion is due 2029.

Glossop Halls

The project at Glossop Halls to update the Market and town hall is due to complete late summer 2025. The Market Hall will be based on a high-quality food and beverage offer whilst there will also be independent retail and event space.

Locality Based Schemes

UKSPF Communities and Place grants continue to be distributed to community groups and town / parish councils to implement activities that enhance physical, cultural and social ties and amenities, such as community infrastructure, local green space and community-led projects.

Town Centre Masterplans / Locality Plans

The Council will work with town and parish councils and other community groups to develop town centre masterplans and rural based schemes. .

Supporting Business / Workforce Skills

Working with partners and skills providers to provide targeted support for small and medium-sized businesses and to fund local skills needs and supplement local adult skills provision. This includes the implementation of UKSPF Local Investment Plan. The Council will

continue to work on the existing projects and interventions set out above but will introduce a new focus on the following activities:

- Supporting Local Business
- People and Skills

Repurpose Redundant Buildings

A review of empty, redundant and at-risk buildings or structures across the High Peak will be implemented in order to establish an approach to their repurposing for new uses such as housing, office space, start-up units or creative affordable workspace or to assist owners with gaining grant funding. Buildings currently at risk are:

- Spread Eagle Pub, Woolley Bridge
- Howard Town House, Glossop
- Victoria Hall, Glossop
- Britannia Mill, Bugsworth
- Cowdale Quarry, King Sterndale
- Buxton Town Hall
- The Dome, Buxton
- University Hall of Residence, Buxton

HPBC assets / strategic acquisitions and investments

The authority will develop a high-level Acquisition and Investment Strategy to assess the potential interventions that could be undertaken by the Council both to stimulate development and generate future revenue.

The strategy will develop a methodology for determining if there is an economic case for intervention or investment in sites throughout the Borough.

The strategy will:

- Establish the rationale and key drivers for investment and intervention.
- Review the overarching strategic national, regional and local policies to understand the priorities and objectives that underpin the case for growth.

- Identify the sites and opportunities in the Borough where investment and intervention should be considered.
- The wide review of sites will include consideration of land and assets owned by the Council.

Growth in the Visitor Economy

The Growth Strategy will support and deliver the actions in the High Peak Tourism Strategy including facilitation of new developments such as improved visitor accommodation and town centre interventions.

A Tourism Partnership Forum has been created to develop and oversee an action plan to support delivery of the Tourism Strategy.

Employment / Enterprise site identification & development

The Council will identify suitable sites and develop a business case for development of an employment / enterprise space to support start-up and expansion opportunities for small and medium businesses.

Strategic Approach to Developer Contributions

A creative and strategic approach to the utilisation of developer contributions in line with the Council's Developer Contributions SPD will be developed.

Business Support / Skills

The Council will develop a refreshed approach that works alongside Derbyshire County Council to:

- Improve the structure of the Council's businesses engagement
- Encourage new business start-ups in the borough
- Provide for strong links with regional skills agencies and local providers

8 Delivery Arrangements

Strategic Partnerships / Engagement

The Council will develop, strengthen and enhance the following strategic partnerships to underpin the delivery of the Growth Strategy:

- Further develop and seek affordable housing delivery partnerships between the Council and local Registered providers or other potential partners
- Continue and strengthen the relationship with Homes England
- Initiate a Planning Forum to engage with current and potential developers
- Strengthen relationships with the borough's large industries such as Swizzels Matlow, Nestle Water, Tarmac and Breedon
- Develop active membership of the East Midlands Chamber of Commerce
- Strengthen the relationship with Homes England
- Engage proactively with Derbyshire County Council in respect of transport issues and development of their Local Transport Plan.
- Proactive membership of EMCCA including ensuring that the cross boundary links with the Greater Manchester and South Yorkshire Combined Authorities are strong recognising their economic impact on High Peak
- Engage with town and parish councils to establish new Town Centre & Locality Partnerships
- Utilise the capacity of the Council's controlled company Alliance Norse to support project delivery

Project Pipeline

An ongoing pipeline of potential projects will be developed to maximise external funding opportunities.

Prospectus / Developer Engagement

A comprehensive investment prospectus will be developed setting out the opportunities in the High Peak for potential investors and developers.

Delivery Responsibilities

The Council will monitor the actions and interventions set out in this strategy as shown below. In particular scrutiny of the implementation and success will be overseen by the Economy and Growth Committee.

Member Leadership

- Deputy Leader and Executive Councillor for Regeneration, Tourism and Leisure
- Executive Councillor for Community Safety and Planning
- Assistant Executive Member
- Economy and Growth Select Committee

Officer Leadership

- Chief Executive
- Head of Regeneration
- Alliance Growth Board

The Alliance Growth Board includes representatives from relevant services develop and will secure the effective arrangements for the delivery of the Growth Strategy by:

- Supporting the development of effective relationships with national, regional and subregional partners
- Promoting the delivery of the allocated sites in the Local Plan
- Maximising the income provided from government funding for growth incentives such as the New Homes Bonus and other external funding opportunities
- Regularly reviewing economic and housing statistics and indicators to identify areas for investment, develop a pipeline of investment projects and provide advice on speculative development proposals
- Identifying and maintaining key delivery partnerships

Implementation Monitoring

The Council will monitor the relevant economic indicators from the Growth Strategy as part of its Performance Framework. These indicators will be used to track the effectiveness of the

actions and interventions and the overall success of the implementation. The outcomes that are as follows:

- Increased council tax base
- Increased business rates take
- Reversal of population decline
- Increased supply of housing including affordable and social housing
- Increased economic activity including business start-ups, economic growth and employment opportunities
- Improved skills attainments
- Increased apprenticeships
- Increased visitor dwell time and spend
- Reduced town centre vacancy rates
- Increased local pride

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High Peak Growth Strategy 2025 -2028

Action Plan

Action Categories	
Local Plan	LP1 – LP42
Regeneration	RG1 – RG10
Enabling Actions	EN1 – EN6
Employment & Skills	ES1 – ES7
Delivery	DY1 – DY13

Missions	
M1	Accelerate Housing Delivery
M2	Increase Employment Growth
M3	Develop the Local Visitor Economy
M4	Support and Diversify the Rural Economy
M5	Further Regenerate Towns
M6	Support Business and the Development of Skills

Constraints	
C1	Local Transport Plan / Public Transport
C2	Green Infrastructure
C3	Social Infrastructure
C4	Other Infrastructure
C5	Developer Contributions
C6	Land Supply
C7	Inward Investment

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Intervention	Existing Context	Missions / Constraints	Scrutiny / Policy Development	Heads of Service	Timescale	
Strategic Sites Review Conduct review of delivery of the strategic sites within the current Local Plan. This will include engagement with landowners, consideration of any planning permissions, pre-application discussions, and consideration refresh of existing masterplans						
LP1	Woods Mill, Glossop		M1 M2 M5		Development Services Regeneration	2025/26
LP2	Former Dinting Railway Museum and land off Dinting Road, Glossop		M1		Development Services Regeneration	2025/26
LP3	Charlestown Works, Charlestown Road, Glossop		M1 M2		Development Services Regeneration	2025/26
LP4	Adderley Place, Glossop	AHDP	M1		Development Services Regeneration Assets	2025/26
LP5	Former Ferro Alloys site, Glossop		M1 M2		Development Services Regeneration	2025/26
LP6	Roughfields / Padfield Main Road, Hadfield	AHDP	M1		Development Services Regeneration Assets	2025/26
LP7	North Road, Glossop		M1		Development Services Regeneration	2025/26
LP8	Land off Derby Road, New Mills		M1		Development Services Regeneration	2025/26
LP9	Land at Ollersett Lane / Pingot Road / Laneside Road New Mills		M1		Development Services Regeneration	2025/26
LP10	Britannia Mill, Buxworth		M1		Development Services Regeneration	2025/26
LP11	Bingswood, Whaley Bridge		M1 M2		Development Services Regeneration	2025/26
LP12	Furness Vale Business Park, Calico Lane, Furness Vale		M1 M2		Development Services Regeneration	2025/26

	Intervention	Existing Context	Missions / Constraints	Scrutiny / Policy Development	Heads of Service	Timescale
LP13	Torr Vale Mill, New Mills		M1 M2		Development Services Regeneration	2025/26
LP14	Newtown, New Mills		M1 M2		Development Services Regeneration	2025/26
LP15	Birch Vale Industrial Estate		M1 M2		Development Services Regeneration	2025/26
LP16	South of Macclesfield Road, Whaley Bridge		M1		Development Services Regeneration	2025/26
LP17	Land at Hogshaw, Buxton	HIF	M1		Development Services Regeneration Assets	2025/26
LP18	Land west of Tongue Lane, Fairfield, Buxton	HIF	M1		Development Services Regeneration Assets	2025/26
LP19	Land off Dukes Drive, Buxton		M1		Development Services Regeneration	2025/26
LP20	Land off Ashbourne Road and Foxlow Farm, Buxton		M1		Development Services Regeneration	2025/26
LP21	Tongue Lane (land south of Tongue Lane Industrial Estate), Buxton		M2		Development Services Regeneration Assets	2025/26
LP22	Station Road and Spring Gardens Regeneration Area, Buxton	Revitalising Buxton	M1 M2 M3 M5		Development Services Regeneration Assets	2025/26
LP23	Market Street Depot	AHDP	M1		Development Services Regeneration Assets	2025/26

Intervention		Existing Context	Missions / Constraints	Scrutiny / Policy Development	Heads of Service	Timescale
Local Plan						
Complete the review of the Local Plan						
LP24	Complete evidence gathering exercise (Housing Market assessment etc.)		M1 M2	Local Plan Steering Group	Development Services	2025/26
LP25	Conduct Green Belt review and identify grey belt opportunities		M1 M2 C6	Local Plan Steering Group	Development Services	2025/26
LP26	Review design standards policies and revise		M1 M2	Local Plan Steering Group	Development Services	2025/26
LP27	Establish carbon reduction and nature recovery ambitions and review policies	Climate Change Strategy & Action Plans Nature Recovery Strategy	M1 M2	Local Plan Steering Group Climate Change Working Group	Development Services Communities & Climate Change	2025/26
LP28	Review current spatial strategy and consider revision to reflect growth opportunities		M1 M2 M3 M4 M5	Local Plan Steering Group	Development Services Regeneration	2025/26
LP29	Review existing allocated sites (in addition to strategic sites) and potential for delivery		M1 M2 M3 M4 M5	Local Plan Steering Group	Development Services Regeneration	2025/26
LP30	Identify potential new locations and sites		M1 M2 M3 M4 C6	Local Plan Steering Group	Development Services Regeneration	2025/26
LP31	Complete Statutory Planning process		M1 M2 M3 M4 M5	Local Plan Steering Group	Development Services	2026/27

Intervention		Existing Context	Missions / Constraints	Scrutiny / Policy Development	Heads of Service	Timescale
Strategic Approach to Developer Contributions <i>Develop a creative and strategic approach to the utilisation of developer contributions in line with the Council's Developer Contributions SPD to ensure effective contributions to the Social Infrastructure of the High Peak</i>						
LP32	Review Developer contributions process to maximise the impact for communities.	Developer Contributions SPD	C3 C5	Local Plan Steering Group	Development Services Regeneration Leisure & Environmental Services	2026/27
Local Transport Plans <i>Ensure the coordination of proposals within the Growth Strategy and the priorities of the relative Integrated Transport Strategies (Derbyshire & East Midlands County Combined Authority))</i>						
LP33	Engage with the Derbyshire local transport planning process and the transition to the EMCCA development of the Local Transport Plan process to ensure that the impact on High Peak is recognised		C1	Economy & Growth Select Committee	Development Services Regeneration	2025/26
Green Infrastructure <i>Establish a strategy to inform how new development should be designed and how it can contribute to the wider green infrastructure network</i>						
LP34	Develop a High Peak Green Infrastructure Strategy		C2	Economy & Growth Select Committee	Development Services Leisure & Environmental Services	2026/27

Intervention		Existing Context	Missions / Constraints	Scrutiny / Policy Development	Heads of Service	Timescale
Working with Utilities <i>Engage with utilities locally to ensure the capacity for development</i>						
LP35	Proactively engage with water utility providers to ensure water and waste connections requirements are recognised		C4		Development Services	2025/26
LP36	Proactively engage with electricity providers to ensure sufficient capacity across the networks		C4		Development Services	2025/26
LP37	Engage with broadband infrastructure providers and other partners to ensure appropriate investment in the network		C4	Corporate Select Committee	Regeneration OD & Transformation Development Services	2025/26
Locality Plans <i>Review the existing masterplans and develop comprehensive structured locality plans</i>						
LP38	Buxton		M1 M2 M3 M4 M5		Development Services Regeneration	2026/27
LP39	Glossopdale		M1 M2 M3 M4 M5		Development Services Regeneration	2026/27
LP40	Central Area		M1 M2 M3 M4 M5		Development Services Regeneration	2026/27
LP41	Rural Areas		M1 M2 M3 M4		Development Services Regeneration	2026/27
LP42	Work with town and parish councils and other locality representatives to support the delivery of neighbourhood plans		M1 M2 M4	Local Plan Steering Group	Development Services Regeneration Democratic Services	2026/27

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Intervention		Existing Context	Missions / Constraints	Scrutiny / Policy Development	Heads of Service	Timescale
Buxton Town Centre Improve the vitality and viability of Buxton town centre						
RG1	Progress the Revitalising Buxton project to deliver the masterplan for the development of the Springs area of the town centre		M1 M2 M3 M5	Economy & Growth Select Committee	Regeneration Assets Finance	2025/26 Ongoing
RG2	Work with the University of Derby to consider the future use of the Devonshire Dome and University Halls of Residence		M1 M2 M5 M6	Economy & Growth Select Committee	Regeneration	2026/27
RG3	Support the High Peak Theatre Trust to develop the long-term regeneration of Buxton Opera House		M3 M5	Economy & Growth Select Committee	Regeneration Assets Communities & Climate Change Finance	2025/26 Ongoing
Glossop Town Centre Improve the vitality and viability of Glossop town centre						
RG4	Deliver the Glossop Halls project to realise the long-term regeneration of Glossop Market, Town Hall & Municipal Buildings		M2 M3 M5	Corporate Select Committee	Regeneration Assets Communities & Climate Change	2025/26 Ongoing
RG5	Work with local community groups to implement short term improvements and a long-term plan to develop Victoria Hall		M2 M3 M5	Economy & Growth Select Committee	Regeneration Assets Communities & Climate Change	2025/26 Ongoing

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Intervention		Existing Context	Missions / Constraints	Scrutiny / Policy Development	Heads of Service	Timescale
New Mills Town Centre <i>Improve the vitality and viability of New Mills town centre</i>						
RG6	Work with the Town Council to establish a New Mills Town Centre Masterplan		M1 M2 M3 M5	Economy & Growth Select Committee	Regeneration Development Services	2026/27
Chapel-en-le-Frith Town Centre <i>Improve the vitality and viability of Chapel-en-le-Frith town centre</i>						
RG7	Work with the Parish Council to establish a Chapel-en-le-Frith Town Centre Masterplan		M1 M2 M3 M5	Economy & Growth Select Committee	Regeneration Development Services	2026/27
Whaley Bridge Town Centre <i>Improve the vitality and viability of Whaley Bridge town centre</i>						
RG8	Work with the Town Council to establish a Whaley Bridge Town Centre Masterplan		M1 M2 M3 M5	Economy & Growth Select Committee	Regeneration Development Services	2026/27
Locality Schemes <i>Work with partners on local regeneration schemes</i>						
RG9	Work with community groups and town and parish councils to deliver the UKSPF Local Investment Plan		M2 M3 M4 M5	Economy & Growth Select Committee	Regeneration	2025/26
RG10	Review the Towns and Villages to consider expanding to a Rural Regeneration Fund to support delivery of smaller locality based initiatives	Towns & Villages Regeneration Fund	M1 M3 M4 M6	Economy & Growth Select Committee	Regeneration	2025/26

Intervention		Existing Context	Missions / Constraints	Scrutiny / Policy Development	Heads of Service	Timescale
Repurpose Redundant Buildings <i>Establish an approach to maximising the repurposing of buildings for new uses (e.g. housing, creative affordable workspace, etc.)</i>						
EN1	Implement the Empty Property Strategy to ensure that empty domestic properties are brought back into use	Empty Property Strategy	M1	Corporate Select Committee	Finance Revenues & Benefits Environmental Health	2025/26 Ongoing
EN2	Conduct a review of all empty and redundant buildings across High Peak and identify potential options for intervention		M1 M2 M4 M5	Economy & Growth Select Committee	Finance Revenues & Benefits Environmental Health Regeneration	2025/26
Affordable & Supported Housing <i>Identify and implement options to achieve increased supply of affordable and supported housing</i>						
EN3	Conduct a strategic review to identify options to increase the supply of affordable and supported housing.		M1	Economy & Growth Select Committee	Regeneration Development Services Finance	2025/26 Quarter 2
Strategic Acquisitions and Investments <i>Develop a high-level Acquisition and Investment Strategy to assess the potential interventions that could be undertaken by the Council both to stimulate development and generate future revenue</i>						
EN4	Develop an Acquisition and Investment Strategy to assess the potential interventions that could be undertaken by the Council both to stimulate development and generate future revenue		M1 M2 M4 M5	Economy & Growth Select Committee	Regeneration Development Services Finance	2025/26

Intervention		Existing Context	Missions / Constraints	Scrutiny / Policy Development	Heads of Service	Timescale
HPBC Assets <i>Review the Council's land and assets holdings to assess opportunities for regeneration</i>						
EN5	Review the Council's land and asset holdings and identify surplus sites for development	Asset Management Framework Disposal Policy for Land and Property	M1 M2 M5	Corporate Select Committee	Assets	2025/26
EN6	Consider the options for Buxton Town Hall to support the accommodation review.		M1 M2 M5	Corporate Select Committee	Assets Regeneration	2025/26

Intervention	Existing Context	Missions / Constraints	Scrutiny/ Policy Development	Heads of Service	Timescale
Growth in the Visitor Economy <i>Deliver the actions in the High Peak Tourism Strategy including encouragement and facilitation of new development (e.g. visitor accommodation, town centre interventions, etc.)</i>					
ES1	Facilitate a High Peak Tourism Partnership and develop a work plan	M3 M4 M6	Economy & Growth Select Committee	Regeneration	Complete
ES2	Work alongside EMCCA and the Derbyshire LVEP to further develop the visitor economy	M3 M4 M6			2025/26
ES3	Develop strong links with the Derbyshire LVEP and develop day itineraries for the High Peak	M3 M4 M5 M6	Economy & Growth Select Committee	Regeneration	2025/26 Ongoing
Employment / Enterprise Site Identification & Development <i>Identify suitable sites and develop a business case for development of an employment / enterprise space to support start-up and expansion opportunities for small and medium businesses</i>					
ES4	Assess demand and develop business case for enterprise space for start-up & expansion opportunities for SME's.	M2	Economy & Growth Select Committee	Regeneration	2025/26
ES5	Identify suitable locations for enterprise space for start-up and expansion opportunities for SME's	M2 M5	Economy & Growth Select Committee	Regeneration Assets	2025/26

Intervention		Existing Context	Missions / Constraints	Scrutiny/ Policy Development	Heads of Service	Timescale
Business Support / Skills <i>Develop a refreshed approach that works alongside Derbyshire County Council & EMCCA to improve the structure of the Council's businesses engagement; encourage new business start-ups in the borough; and provide for strong links with regional skills agencies and local providers</i>						
ES6	Review and refresh current business engagement activities		M6		Regeneration	2025/26
ES7	Work with Partners and local skills providers to identify the needs of local businesses and improve adult skills provision.		M6		Regeneration	2026/27

Intervention		Existing Context	Missions / Constraints	Scrutiny / Policy Development	Heads of Service	Timescale
Strategic Partnerships / Engagement <i>Develop, strengthen and enhance strategic partnerships to underpin the delivery of the Growth Strategy</i>						
DY1	Review existing affordable and supported housing partnerships and identify options for further development		M1		Regeneration Housing	2025/26
DY2	Initiate a Planning Forum to engage with current and potential developers		M1 M2		Development Services	2025/26
DY3	Develop arrangements to strengthen relationships with the district's large employers		M6		Regeneration	2025/26
DY4	Maintain and develop membership of the East Midlands Chamber of Commerce		M6		Regeneration	2025/26 Ongoing
DY5	Strengthen the relationship with Homes England		M1		Regeneration	2025/26 Ongoing
DY6	Continue to work with Derbyshire County Council via the D2 Strategic Leadership Board		M1 M2 M3 M4 M5 M6		Chief Executive	2025/26 Ongoing
DY7	Engage proactively with Derbyshire County Council and EMCCA in respect of transport issues and development of the Local Transport Plan		C1		Regeneration Development Services	2025/26 Ongoing
DY8	Engage with town and parish councils and investigate the establishment of new Town Centre & Locality Partnerships		M4 M5	Economy & Growth Select Committee	Regeneration Democratic Services	2025/26
DY9	Continue to work with EMCCA via		M1 M2 M3		Regeneration	2025/26

Intervention		Existing Context	Missions / Constraints	Scrutiny / Policy Development	Heads of Service	Timescale
	the Board and relevant committees to secure funding for growth in High Peak		M4 M5 M6			Ongoing
DY10	Work EMCCA to ensure that the cross boundary links with the Greater Manchester and South Yorkshire Combined Authorities are strong recognising their economic impact on High Peak		M1 M2 M3 M4 M5 M6		Chief Executive	2025/26 Ongoing
DY11	Utilise the capacity of the Council's controlled company Alliance Norse to support project delivery.		M1		Regeneration Assets	2025/26 Ongoing
Project Pipeline Develop an ongoing pipeline of potential projects to maximise external funding opportunities						
DY12	Create ongoing pipeline of housing and employment interventions.		M1 M2 C7	Economy & Growth Select Committee	Regeneration Development Services	2025/26
Prospectus / Developer Engagement Develop a process of engagement with potential developers						
DY13	Develop a comprehensive investment prospectus setting out the opportunities in High Peak for investors and developers.		M1 M2 M3 M4 M5 C7	Economy & Growth Select Committee	Regeneration	2025/26

