

**SUPPLEMENTARY PLANNING
POLICY NOTE –
NATIONAL PLANNING
POLICY FRAMEWORK
(AUGUST 2026)**

**Proposed Residential
Development, Land at Talbot
Road, Glossop**

Derbyshire County Council

08 September 2026

Carter Jonas

Date: 8th September 2026

Client: Derbyshire County Council

Job Number: J0097252

Contact: Sarah Cox MRTPI

First Floor
9 Bond Court
Leeds
LS1 2JZ

T: 0113 242 5155

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1. PURPOSE OF THIS NOTE

- 1.1 Since the submission of my Proof of Evidence dated 21st July 2026, the Government has published a revised version of the National Planning Policy Framework ("NPPF") in August 2026. The National Planning Policy Framework 2026 confirms that it replaces the previous December 2024 version and applies immediately as a material consideration in decision-taking.
- 1.2 The purpose of this note is to identify those changes to national policy which are relevant to the determination of the appeal and to explain the implications for the conclusions set out in my Proof of Evidence.
- 1.3 Having reviewed the revised Framework in full, my overall conclusion remains unchanged. Indeed, in my opinion, the revised NPPF strengthens the Appellant's case and increases the policy support for the redevelopment of the appeal site.

2. STATUS OF THE NEW FRAMEWORK

- 2.1 Annex A of the August 2026 NPPF confirms that the national decision-making policies contained within the Framework are material considerations from the date of publication and should be applied immediately in development management and appeal decisions.
- 2.2 The appeal must therefore be determined having regard to both the adopted development plan and the revised national decision-making policies introduced through the August 2026 Framework.

3. STRUCTURAL CHANGES TO THE NPPF

- 3.1 The revised NPPF adopts a fundamentally different structure from the December 2024 Framework.
- 3.2 Rather than relying upon a single balancing exercise contained within former paragraph 11(d), the revised Framework introduces a series of national decision-making policies including:
 - Policy S3: Presumption in favour of sustainable development
 - Policy S4: Principle of development within settlements
 - Policy S5: Principle of development outside settlements
 - Policy L2: Making effective use of land
 - Policy L3: Achieving appropriate densities
 - Policy HO7: Meeting the need for homes
 - Policy HC7: Development affecting existing recreational land and facilities

3.3 Importantly, the appeal site falls wholly within the defined settlement boundary of Glossop and it remains agreed between the parties that:

- the site lies within the settlement boundary;
- the site occupies a sustainable location; and
- residential development is acceptable in principle.

4. POLICY S4 – DEVELOPMENT WITHIN SETTLEMENTS

Relationship Between the Adopted Development Plan and Policy S4

- 4.1 The revised Framework requires the appeal to be determined having regard both to the development plan and to the national decision-making policies introduced in August 2026. Whilst the adopted High Peak Local Plan remains part of the statutory development plan, the appeal site is located within the defined Glossop settlement boundary, and it is agreed between the parties that residential development is acceptable in principle.
- 4.2 Policy S4 is therefore directly engaged. Policy S4 provides that development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by adverse effects when assessed against the national decision-making policies of the Framework.
- 4.3 The significance of Policy S4 is that national policy now establishes a positive presumption in favour of development within settlements. In the circumstances of this appeal, Policy S4 operates alongside the development plan and represents a substantial material consideration in favour of the proposal.
- 4.4 The appeal site is an allocated settlement location, constitutes previously developed land and is capable of making an immediate contribution towards housing delivery. These are factors which place the proposal squarely within the category of development which Policy S4 seeks to support.

Policy S4 – Principle of Development Within Settlements

- 4.5 In my opinion, the most significant national policy change for the purposes of this appeal is the introduction of Policy S4.
- 4.6 Policy S4 provides:

"Development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework."

- 4.7 This represents a clear and strongly permissive policy position for development proposals located within settlements.
- 4.8 In my opinion, the significance of Policy S4 should not be understated. The appeal site lies wholly within the Glossop settlement boundary and national policy now expressly directs that development proposals within settlements should be approved unless adverse effects substantially outweigh the benefits. This is a clear statement of national policy support which applies directly to the appeal proposal.
- 4.9 The appeal proposal therefore does not rely solely upon housing land supply considerations. It benefits from direct support under Policy S4 by virtue of its location within a sustainable settlement and on previously developed land.
- 4.10 The policy establishes a presumption in favour of approval unless adverse effects substantially outweigh benefits.
- 4.11 In my opinion, this policy position is materially stronger than that contained within the previous Framework and provides direct support for the appeal proposal.

5. HOUSING DELIVERY AND POLICY HO7

- 5.1 The revised Framework significantly strengthens national policy support for housing delivery. Policy HO7 states:

"Substantial weight should be given to the benefits of providing homes which will contribute towards meeting the evidenced accommodation needs of the community."

- 5.2 The policy expressly applies to:

- market housing;
- affordable housing; and
- housing required by specific groups within the community.

- 5.3 Policy HO7 represents an important change to the national policy framework and is directly relevant to the determination of this appeal. National policy now expressly directs decision-makers to attach substantial weight to the benefits of housing which contributes towards meeting evidenced accommodation needs. The policy specifically refers to evidenced housing need and encompasses accommodation needs identified through local housing assessments and other relevant evidence.

- 5.4 The appeal proposal would deliver:

- up to 100 dwellings;

- up to 30 affordable dwellings; and
- a mix of housing types and tenures.

- 5.5 There is no dispute that these dwellings, affordable dwellings, and housing mix is needed in High Peak.
- 5.6 The appeal proposal would deliver up to 100 dwellings in a sustainable location within the Glossop settlement boundary. In the context of High Peak's significant housing land supply shortfall, the delivery of those homes attracts substantial weight in the planning balance pursuant to Policy HO7. The parties have also agreed within the Statement of Common Ground on Planning Balance Matters that meeting an identified need for housing should be afforded substantial weight.
- 5.7 These conclusions reinforce the assessment contained within Sections 5 and 6 of my Proof of Evidence regarding housing delivery and affordable housing provision. They are also consistent with the position agreed by the parties within the Statement of Common Ground on Planning Balance Matters, which recognises that meeting identified housing needs should be afforded substantial weight in the determination of this appeal.

6. FIVE-YEAR HOUSING LAND SUPPLY

- 6.1 The revised Framework retains the requirement for local planning authorities to identify and maintain a five-year supply of deliverable housing sites. Annex D confirms that local authorities should continue to identify a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against the relevant housing requirement.
- 6.2 Nothing within the revised Framework alters the factual position in respect of High Peak Borough Council's housing land supply.
- 6.3 Even on the Council's own figures, High Peak can demonstrate less than half of the housing land supply required by national policy. On the Appellant's assessment, the deficit is materially greater.
- 6.4 The revised Framework does not alter the significance of the housing land supply evidence before the Inquiry. Rather, it reinforces the importance of sustainable and deliverable sites capable of contributing towards identified housing needs in the short term.
- 6.5 The revised Framework expressly requires substantial weight to be given to housing delivery through Policy HO7, whilst High Peak can demonstrate only between 1.89 and 2.47 years' housing supply. The appeal proposal comprises a deliverable brownfield site within the settlement boundary capable of delivering up to 100 homes, including approximately 30 affordable homes, within the short term.

The Importance of Deliverable Sites

- 6.6 My Proof of Evidence and Mr Holliday's Proof of Evidence demonstrate that housing delivery within High Peak has been in long-term decline. Housing starts have reduced significantly in recent years and completions have similarly declined. The Council's monitoring evidence demonstrates that housing delivery has consistently failed to meet assessed requirements.
- 6.7 The appeal site possesses a number of characteristics that are particularly relevant in the current housing supply context. It is:
- available;
 - deliverable;
 - in single ownership;
 - located within the settlement boundary;
 - previously developed land; and
 - capable of contributing towards both market and affordable housing needs within the five-year period.
- 6.8 In circumstances where the Council is unable to demonstrate a five-year supply of deliverable housing land and where delivery has continued to decline, sites possessing these characteristics attract increased significance in planning terms.
- 6.9 The appeal addresses affordable housing needs. There is currently no identified short-term mechanism through which the Council can address the housing shortfall identified in the evidence before the Inquiry.
- 6.10 The most recently published Housing Delivery Test results incorporate the 2024 and 2025 monitoring years. Had the revised Standard Method been applied immediately, the Council's HDT performance would have fallen to approximately 50%, as identified in Mr Holliday's Proof of Evidence. However, the Government has introduced transitional arrangements so that the revised Standard Method published in December 2024 will not be used for HDT calculations until the 2027/28 monitoring year. Instead, the previous Standard Method will continue to apply through to 2026/27. As a consequence, 2030 will be the first Housing Delivery Test calculated entirely against housing need figures derived from the revised Standard Method.
- 6.11 Notwithstanding this, the Council has accepted that its housing requirement figure is more than five years old and that its housing requirement should therefore be based upon the standard method published on 12th December 2024. Whilst the published HDT results do not yet reflect that requirement, the Council's latest Authority Monitoring Report demonstrates that recent delivery has fallen to approximately 50% of local housing need, as set out within my Proof of Evidence.

Future Prospects for Housing Delivery

- 6.12 The conclusions set out in Section 10 of Mr Holliday's Proof of Evidence remain unaffected by publication of the revised Framework. The adopted High Peak Local Plan remains materially out of date.
- 6.13 The Council remains significantly delayed in preparing a replacement Local Plan and there is little realistic prospect of a new development plan being adopted within a timeframe capable of addressing the Borough's current housing shortfall. Accordingly, there is no identified short-term route through the plan-making process capable of resolving the housing deficit identified in the evidence before the Inquiry.
- 6.14 In these circumstances, sustainable and deliverable housing proposals such as the appeal proposal assume increased importance.

7. AFFORDABLE HOUSING

- 7.1 The evidence set out in Mr Holliday's Proof of Evidence demonstrates a significant and persistent affordable housing shortfall across the Borough.
- 7.2 The Council's evidence identifies an affordable housing requirement of between 228 and 270 affordable dwellings per annum. The Borough Plan, Housing Strategy and Housing and Economic Land Needs Assessment all identify substantial unmet affordable housing needs.
- 7.3 Recent delivery of affordable housing remains substantially below identified need. Only 211 affordable dwellings were completed during the most recent three-year monitoring period.
- 7.4 The appeal proposal would deliver approximately 30 affordable dwellings and would therefore make a meaningful contribution towards addressing identified affordable housing needs within the Borough.
- 7.5 Policy HO7 applies equally to affordable housing need and substantial weight should therefore be attributed to this component of the proposal. Both parties have agreed that the delivery of affordable housing should be afforded substantial weight in the planning balance.
- 7.6 In my opinion, substantial weight should be attributed to the affordable housing benefits arising from the appeal proposal, consistent with the requirements of Policy HO7 and the identified evidence of affordable housing need across High Peak.

8. BROWNFIELD LAND AND EFFECTIVE USE OF LAND

- 8.1 The revised Framework strengthens policy support for the redevelopment of previously developed land.

8.2 Policy L2 states that:

"Substantial weight should be given to the benefits" of making effective use of previously developed land and bringing vacant and underutilised land back into productive use.

8.3 The appeal site:

- comprises previously developed land;
- has remained vacant for a prolonged period;
- is located within the urban area of Glossop; and
- represents a significant brownfield regeneration opportunity.

8.4 As a consequence, the proposal benefits from direct support under Policy L2 and the redevelopment of the site should attract substantial weight in the planning balance.

8.5 The characteristics of the appeal site align closely with the objectives of Policy L2 and the wider objectives of the Framework relating to the effective use of land. The site comprises vacant previously developed land within the settlement boundary, no longer performs any operational function and is capable of making a meaningful contribution towards housing delivery in the short term.

8.6 In my opinion, substantial weight should be afforded to the redevelopment of this previously developed site, having regard to the clear policy support provided by Policy L2 for the reuse of vacant and underutilised land. The redevelopment of the site would represent an efficient and sustainable use of land in a location that is already recognised as suitable for development in principle.

9. RECREATIONAL LAND, SPORTS FACILITIES AND PLAYING FIELDS

9.1 Former paragraph 104 of the December 2024 Framework has now been recast as Policy HC7.

9.2 Policy HC7 provides that development resulting in the loss of existing open space, sports and recreational land should not be supported unless one of a number of specified exceptions applies.

9.3 The wording of Policy HC7 is materially similar to former paragraph 104 of the previous Framework. Consequently, the analysis contained within Section 5 of my Proof of Evidence remains applicable and my conclusions are unaffected by publication of the revised Framework.

9.4 My primary position remains that:

- a) The appeal site does not constitute an existing playing field for the purposes of national policy; or alternatively;

- b) the site is surplus to sporting requirements; and/or;
- c) equivalent or better replacement provision has been, or will be, provided.

9.5 Importantly, whilst the numbering and structure of national policy has changed, the substance of the policy remains materially unchanged. The reasons set out within my Proof of Evidence explaining why the site does not constitute an existing playing field, or alternatively satisfies the policy tests relating to surplus provision and replacement provision, remain fully applicable.

9.6 The publication of the revised Framework does not alter those conclusions. Accordingly, there is no additional policy conflict arising from Policy HC7 and the revised Framework does not diminish the Appellant's case in respect of recreational land considerations.

10. OTHER POLICY MATTERS

Design

10.1 Former paragraphs relating to design have now been consolidated within Policy DP3.

10.2 Policy DP3 continues to promote:

- well-designed places
- optimisation of site potential
- high-quality placemaking
- the effective use of land

10.3 Importantly, Policy DP3 expressly recognises that development should not be prevented from making effective use of land where increased density is justified by the circumstances of the site and its surroundings.

10.4 The publication of the revised Framework does not alter the conclusions reached by the Appellant's design team. The proposed development has been informed by a comprehensive assessment of site constraints and opportunities and has been prepared in accordance with the principles of good placemaking promoted by national policy.

10.5 In my opinion, the revised Framework is entirely consistent with the evidence of Mr Crawford and supports the landscape-led approach advanced by the Appellant.

Heritage Considerations

- 10.6 The publication of the revised Framework does not alter the conclusions reached in respect of heritage matters. Based on the evidence before the Inquiry, the appeal proposal would not result in harm to the significance of any designated heritage asset (see Policy HE5(2)(b)). Accordingly, I consider that the proposal remains consistent with the relevant heritage policies of the Framework and that no heritage objection arises.
- 10.7 If, however, the Inspector were to conclude that the proposals would give rise to a degree of less than substantial harm to the significance of a heritage asset, the Framework requires that harm to be weighed against the public benefits of the proposal (see Policy HE6(4)). Those benefits include the provision of market and affordable housing, the redevelopment of a vacant brownfield site within the settlement boundary and the contribution the development would make towards meeting identified housing needs.
- 10.8 For the reasons set out in my Proof of Evidence, I consider that those public benefits would be sufficient to outweigh any such harm.

11. WEIGHT TO BE GIVEN TO THE ADOPTED LOCAL PLAN

- 11.1 Annex A of the revised Framework states that development plan policies which are materially inconsistent with the national decision-making policies of the Framework should attract very limited weight unless they have been examined against the current Framework.
- 11.2 The High Peak Local Plan was adopted in 2016 and has not been examined against the revised Framework.
- 11.3 The significance of this issue is that the revised Framework introduces a series of national decision-making policies, including Policy S4, which were not in place at the time the Local Plan was prepared or examined.
- 11.4 Consequently, where any tension arises between the adopted Local Plan and the revised national policy framework, it is necessary to consider the extent to which the relevant development plan policies remain consistent with the current Framework and the weight that should reasonably be attributed to them in that context.
- 11.5 The appeal site lies within the Glossop settlement boundary and the principle of residential development is agreed between the parties. In addition, the proposal would deliver housing, affordable housing and the redevelopment of previously developed land, all matters which are strongly supported by the revised Framework through Policies S4, HO7 and L2 respectively.

- 11.6 In my opinion, the revised Framework is capable of attracting significant weight in the determination of this appeal. To the extent that individual development plan policies are materially inconsistent with the revised national decision-making framework, increased weight should be afforded to the current Framework when undertaking the overall planning balance.

12. SUPPORTING TECHNICAL ADDENDA

- 12.1 The implications of the August 2026 National Planning Policy Framework have also been reviewed by the Appellant's specialist consultants in relation to design, ecology, transport, flood risk and drainage matters. Their findings are provided as appendices to this Supplementary Planning Policy Note and confirm that the technical evidence submitted in support of the appeal remains robust and consistent with the updated national policy framework.

Design and Placemaking

- 12.2 **Appendix A** comprises a note prepared by Charles Crawford of LDA Design, which considers the implications of the revised NPPF design and placemaking policies. The note confirms that the design evidence previously submitted remains consistent with Policy DP3 (Achieving Well-Designed Places) and the wider objectives of Chapter 14 of the revised Framework. It explains how the illustrative masterplan responds to the site context, reflects the principles of the National Design Guide, retains and integrates existing landscape features, incorporates extensive green infrastructure and street tree planting, and promotes a high-quality landscape-led approach to development.
- 12.3 The LDA review also considers the implications of Policy N3 in relation to tree planting and green infrastructure. It confirms that the illustrative masterplan incorporates extensive new tree planting throughout the site, including street trees, structural landscape planting and wider green infrastructure enhancements. The review demonstrates that there is sufficient capacity within the site to accommodate a significant increase in tree cover, contributing positively to biodiversity, visual amenity, urban greening and climate resilience objectives. The proposals therefore not only retain important landscape features where appropriate but also provide meaningful opportunities for the enhancement of tree cover and green infrastructure, consistent with the objectives of Policy N3.
- 12.4 The note concludes that the revised Framework does not alter the design conclusions previously reached and that the proposals remain compliant with national design policy objectives.

Ecology and Biodiversity

- 12.5 **Appendix B** comprises an ecology addendum prepared by Tyler Grange reviewing the implications of the revised NPPF's natural environment policies. The addendum concludes that the ecological assessment submitted in support of the appeal remains fully applicable under the updated Framework.

- 12.6 The review confirms that the proposals align with the objectives of Policies N1 to N6, support nature recovery, accord with the Derbyshire Local Nature Recovery Strategy, deliver significant Biodiversity Net Gain, retain important ecological features and trees, and provide additional habitat enhancements. It further confirms that there would be no adverse effects on designated ecological sites and that impacts on protected species remain appropriately addressed through the mitigation and enhancement measures previously submitted.

Transport and Accessibility

- 12.7 **Appendix C** comprises a transport technical note prepared by Matt Rudman of Rappor Consultants Ltd, which reviews the appeal proposal against the transport policies introduced by Chapter 15 of the revised Framework. The note assesses compliance with Policies TR3, TR4, TR6 and TR8 and concludes that the proposal remains fully aligned with national transport policy.
- 12.8 The review confirms that the site occupies a sustainable location within the built-up area of Glossop, benefits from access to public transport and local services, and is capable of supporting walking, cycling and public transport use. It further confirms that the submitted Transport Assessment and Residential Travel Plan remain valid and that neither the evidence submitted with the application nor the assessment undertaken by the Local Highway Authority identifies any severe adverse impact on the transport network or any unacceptable impact on highway safety.
- 12.9 The transport review therefore concludes that the proposal accords with the requirements of the revised Framework and that the refusal tests contained within Policy TR6 are not engaged.

Flood Risk and Drainage

- 12.10 **Appendix D** comprises a flood risk and drainage review prepared by Johann Zeuner Griffiths, Senior Civil Engineer at Adept Consulting Engineers. The review considers the implications of the revised Framework in relation to Policy F4 (Assessing Flood Risk for Decision-Making), Policy F7 (Ensuring Development is Safe from Flooding) and Policy F8 (Sustainable Drainage Systems and Watercourses).
- 12.11 The review confirms that the appeal site lies within Flood Zone 1 and is therefore at low risk of flooding from rivers and the sea. It concludes that the submitted Flood Risk Assessment and Drainage Strategy appropriately assess all relevant sources of flood risk and demonstrate that surface water runoff can be satisfactorily managed through the proposed sustainable drainage strategy.
- 12.12 Accordingly, the review concludes that the proposal remains consistent with the updated national policy framework relating to flood risk and drainage matters.

Conclusion on the Technical Addenda

- 12.13 Collectively, the technical reviews demonstrate that publication of the August 2026 NPPF does not alter the conclusions of the Appellant's previously submitted technical evidence. Rather, the updated Framework reinforces the conclusions reached by the Appellant's design, ecology, transport and engineering specialists. Each discipline has confirmed that the appeal proposals continue to accord with the relevant national planning policies and that no new policy conflict arises as a consequence of the revisions to the Framework.
- 12.14 These technical addenda are therefore appended to this note for completeness and to assist the Inspector in considering the appeal against the revised national policy framework.

13. UPDATED PLANNING BALANCE

Housing Need and the Current Context

- 13.1 The implications of the August 2026 NPPF should be considered in the context of the acute housing delivery challenges currently facing High Peak. The evidence before the Inquiry demonstrates that housing delivery has fallen significantly in recent years, that the Council is unable to demonstrate a five-year supply of deliverable housing land and that substantial affordable housing needs remain unmet across the Borough.
- 13.2 The Council's adopted Local Plan is increasingly out of date and there is no realistic prospect of the plan-making process addressing those housing needs in the short term. The evidence before the Inquiry demonstrates that housing supply has continued to decline and that there is no identified mechanism capable of delivering the scale of housing required to address the Borough's shortfall within the near future.
- 13.3 In those circumstances, sustainable and deliverable sites capable of contributing towards housing delivery assume particular importance. The appeal site comprises previously developed land within the Glossop settlement boundary and is capable of delivering up to 100 dwellings, including affordable housing, in the short term.
- 13.4 It is against that background that the planning balance now falls to be reassessed under the revised Framework and, in particular, the operation of Policies S4, HO7 and L2.

The Revised NPPF

- 13.5 For the assistance of the Inspector, I have reviewed the conclusions set out in Sections 5 and 6 of my Proof of Evidence in light of the August 2026 NPPF. The factual assessment of benefits and adverse

effects remains unchanged. However, the national policy framework against which that assessment falls to be undertaken has materially changed.

- 13.6 The appeal site lies within the defined Glossop settlement boundary and it remains common ground that the site occupies a sustainable location and that residential development is acceptable in principle. Policy S4 is therefore directly applicable. It establishes that development proposals within settlements should be approved unless the benefits of doing so are substantially outweighed by adverse effects when assessed against the national decision-making policies of the Framework. In the context of this appeal, Policy S4 provides direct national policy support for the principle of the proposed development.

Continued Relevance of the Proof of Evidence

- 13.7 The analysis contained within Sections 5 and 6 of my Proof of Evidence remains relevant and should be read in the context of the revised Framework. In particular, the planning balance table contained within Section 6 remains unchanged. No revisions are required to the identification of benefits, adverse effects or the evidential conclusions contained within that assessment.
- 13.8 The principal change relates to the policy weight to be attributed to those matters. Accordingly, references within paragraphs 6.8 to 6.25 of my Proof of Evidence to the operation of national planning policy should now be read by reference to Policy S4 of the August 2026 NPPF. Whilst the structure of national policy has changed, the conclusions reached within those paragraphs remain applicable and are, in my opinion, reinforced by the revised Framework.
- 13.9 The benefits identified within the planning balance include the delivery of up to 100 dwellings, approximately 30 affordable homes, the redevelopment of previously developed land and a meaningful contribution towards addressing the Borough's acute housing supply shortfall. Those benefits remain unchanged. However, the revised Framework now expressly requires substantial weight to be given to housing delivery and the effective use of previously developed land, whilst Policy S4 provides a clear presumption in favour of development within settlements.
- 13.10 The introduction of Policy S4 does not displace the development plan. Rather, it operates alongside it as a significant material consideration. In this case, the proposal's location within the Glossop settlement boundary is consistent with the spatial strategy of the adopted Local Plan, including Policy HO7. For the avoidance of doubt, it remains my opinion that the proposal complies with Policy HO7 and that there is no conflict with that policy. In any event, if the Inspector were to conclude that there is a degree of non-compliance with Policy HO7, any such conflict would attract only very limited weight in the planning balance and would not displace the presumption in favour of development within settlements established by Policy S4.
- 13.11 The proposal therefore benefits both from its accordance with the adopted settlement strategy and from the direct policy support provided by Policy S4.

Update to Planning Balance Table

- 13.12 The planning balance table contained at page 71 of my Proof of Evidence remains unchanged and no amendments are required to the identification of benefits, adverse effects or the factual conclusions reached within that assessment. The table continues to provide an accurate summary of the planning benefits and impacts arising from the proposal.
- 13.13 The principal change arising from publication of the August 2026 NPPF relates not to the content of the table, but to the policy framework against which those matters are assessed. In particular, the housing delivery benefits, affordable housing provision and redevelopment of previously developed land identified within the table now attract enhanced weight having regard to Policies S4, HO7 and L2 of the revised Framework. The adverse effects identified within the table remain unchanged. Accordingly, whilst the planning balance table at page 71 remains factually accurate and requires no amendment, I consider that the balance to be struck when applying current national policy weighs more decisively in favour of granting planning permission.
- 13.14 When the planning balance is reassessed against the revised Framework, the adverse effects identified within my Proof remain unchanged. To the extent that any adverse effect is said to arise from an alleged conflict with Policy HO7, I consider that matter to carry very limited weight. As set out above, the proposal complies with Policy HO7 in any event, but even if a contrary conclusion were reached, the limited weight attributable to any such conflict would not outweigh, or materially diminish, the operation of the Policy S4 presumption in favour of development within settlements.
- 13.15 By contrast, the weight to be afforded to the proposal's principal benefits is strengthened by Policies S4, HO7 and L2. Consequently, whilst the planning balance assessment itself remains unchanged, the balance weighs more decisively in favour of granting planning permission under the August 2026 Framework.

14. OVERALL CONCLUSION

- 14.1 Having reviewed the August 2026 National Planning Policy Framework in full, I conclude that the revised Framework strengthens rather than weakens the Appellant's case.
- 14.2 In particular:
- Policy S4 establishes a strong presumption in favour of development within settlements;
 - Policy HO7 requires substantial weight to be given to housing delivery benefits;
 - Policy L2 requires substantial weight to be given to the redevelopment of previously developed land (noting that HPBC applied 'moderate positive weight' within the previously agreed Planning Balance Statement of Common Ground);

- the appeal site remains a sustainable location within the Glossop settlement boundary; and
- the revised policy relating to recreational land does not materially alter the conclusions reached in my Proof of Evidence.

- 14.3 The factual conclusions reached within my Proof of Evidence remain unchanged. The proposal would deliver up to 100 dwellings, including approximately 30 affordable homes, on a vacant brownfield site located within the settlement boundary. The proposal would therefore contribute towards meeting identified housing and affordable housing needs whilst making effective use of previously developed land in a sustainable location.
- 14.4 The revised Framework places increased emphasis on each of those benefits. Policy S4 provides direct support for development within settlements. Policy HO7 requires substantial weight to be given to housing delivery benefits. Policy L2 requires substantial weight to be given to the effective use of previously developed land.
- 14.5 Accordingly, whilst publication of the August 2026 NPPF does not alter the factual conclusions reached within my Proof of Evidence, it does strengthen the policy support applicable to the appeal proposal. In my opinion, the appeal proposal represents a sustainable, deliverable and policy-compliant form of development that accords with the objectives of the revised Framework.
- 14.6 My conclusions therefore remain unchanged and are reinforced by the publication of the August 2026 National Planning Policy Framework.

APPENDIX A: COMMENTARY FROM LDA DESIGN

BY EMAIL

03 September 2026

Glossop, Talbot Road

Following a careful review of the 2026 update to the National Planning Policy Framework (NPPF) please find below further comments in relation to my evidence.

The first paragraph of section **14. Achieving well-designed places** policy *DP3 Key principles for well-designed places* has been addressed in my Proof at section **5. Key Design Considerations** under *5.2 Context* where I describe the setting of Glossop town centre, and styles and typologies of site-adjacent properties, as well as respond to the Landscape and Visual Appraisal (submitted as part of the application) and nearby Conservation Area.

Further to that, within section **6. Response to RfR2** under *6.3 Design Quality* I reference the National Design Guide (NDG) as the most appropriate benchmark against which to test design quality. One of the ten characteristics of place which exhibits good design relates to context – C1: Understand and relate well to the site, its local and wider context. In the table on pages 28 and 29 of my Proof I expressed how the illustrative layout responds to these standards by designing with the local topography, following the linear grid settlement pattern and two storey residential typology prevailing in the surrounding areas as well as maximising the retention of existing vegetation.

In response to the second paragraph of **14. Achieving well-designed places** *DP3 Key principles for well-designed places*, the Design and Placemaking Planning Practice Guidance (PPG) is still in draft form (consultation closed on 10th March 2026). The document was expected to be finalised alongside updates to the NPPF but has not been published to date. Nonetheless, looking at the principles that seem relevant at outline stage, points c to g map directly to 5 of the 10 NDG characteristics, which are addressed in section 6.3 Design Quality of my Proof. Principles a) Liveability relates to NDG P3: Make sure public spaces support social interaction; U2: A mix of homes tenures, types and sizes; and U3: Socially inclusive – commentary on how the illustrative layout responds to them can be found on page 33 of my Proof. Principle b) Climate relates to NDG R1: Follow the energy hierarchy; and R3: Maximise resilience to which commentary is also provided on page 33 in the Resources theme table

Registered Head Office
LDA Design Consulting Ltd
17 Minster Precincts
Peterborough, PE1 1XX
United Kingdom
01733 310471

Registered no: 09312403
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highlighting south-facing front/rear elevation and roof slopes, and SuDS, trees and other features addressed under theme tables Nature and Public spaces.

In the context of section **19. Conserving and enhancing the natural environment**, policy *N2: Improving the natural environment* the illustrative layout meets the requirements, particularly points d, e and f of first paragraph with point g, long-term management, being covered by conditions and/or Section.106. The layout has maximised the retention of existing vegetation, introduced new planting along streets and within public spaces, featured water management elements including attenuation basin which is well-integrated into public space, and provides continuity of green infrastructure to support the movement of species.

Policy N3: Trees in new development has been addressed in my Proof at section **5. Key Design Considerations** under *5.9 Street Trees*. The points stress that while this issue should be addressed at reserved matters stage, the illustrative layout presents extensive planting both along streets, including a 3m wide verge alongside the central street, and within green spaces across the site.

Yours sincerely,

Charles Crawford

Director

Charles.Crawford@lda-design.co.uk

APPENDIX B: COMMENTARY FROM TYLER GRANGE

3rd September 2026

Tyler Grange Ref: 15974 Talbot Road, Glossop

National Planning Policy Framework (NPPF) updates, Ecology

The National Planning Policy Framework (NPPF)¹ updates, hereafter referred to as 'the Framework', published on 17 August 2026, will not result in any material changes to the submitted ecological assessment, which accompanied the Talbot Road, Glossop outline planning application².

The Framework places nature recovery at the centre of planning for the natural environment. Chapter 19 Conserving and enhancing the natural environment contains the principal policies, N1 to N6, covering environmental evidence, Local Nature Recovery Strategies, ecological networks, biodiversity net gain, priority and threatened species, trees, Protected Landscapes, coastlines, designated sites and irreplaceable habitats.

Policy N1 states that development plans should use Local Nature Recovery Strategies (LNRS), Protected Landscape Management Plans, River Basin Management Plans, forest strategies and other evidence to identify and protect nature and derive wider benefits from natural capital and ecosystem services. Although the Preliminary Ecological Appraisal² was submitted prior to Local Planning Authorities (LPAs) issuing their respective LNRS, the proposals are in line with Derbyshire County Councils LNRS³ as there are no 'Areas of Particular Importance' covering the Site, and the only area within the Site which are covered by 'Areas that Could Become of Importance' is a small 'Wetland' habitat measure, covering the southwest corner of the Site; the Site proposals are in compliance, due to the proposed location of water features and therefore wetland habitats, such as SuDs and swales within the southwest corner of the Site. The Site is not covered by any other natural capital services such as River Basin Management Plans and forest strategies.

Policy N2 states that development should contribute positively to the natural environment, and support nature's recovery. This has been evidenced through the substantial Biodiversity Net Gain (BNG); whereby the Parameter Plan⁴ was assessed against the baseline habitats, resulting in a +144.01% net gain for habitat areas and +167.37% for linear features, such as hedgerows.

¹ National Planning Policy Framework, August 2026: [National Planning Policy Framework.pdf](#)

² 15974_R01_PEA_NB_120824

³ Derbyshire Local Nature Recovery Strategy - Local Habitat Map: <https://maps.derbyshire.gov.uk>

⁴ Parameter Plan: 10592-LDA-XX-XX-DG-UD-3001-P01



Policy N3 states that development should make provision for existing and new tree planting. This has been evidenced within the proposals through the retention of existing trees and the commitment to new tree planning within the Design Code. The proposals detail that there are no trees or hedgerows in 'Category A', the layout demonstrates retention of all trees in 'Category B', with the remaining trees being 'Category C' and 'Category U'. Most of the Category C trees are to be retained with only a small number of Category U trees within the interior of the Site being required for removal. The illustrative layout shows extensive planting of street trees. Many of the streets on the layout front onto public open space, which allows ample opportunity for tree planting.

Policy N4 and N5 relate respectively to Protected Landscapes and Maintaining the character of the coast; neither of which have relevance to the Site or proposals.

Policy N6 states that development should support the conservation of important habitats, species and sites of geodiversity value. The PEA evidenced compliance with this Policy as it concluded that the development is not included in the risk category for potential impacts upon the South Pennine Moors SPA and SAC, and therefore consultation with Natural England was not required. It was considered that the Parameter Plan for the Site is unlikely to result in loss of functionally linked land for the qualifying bird species of the SPA and qualifying habitats of the SAC. High Peak Habitats Regulations Assessment⁵ concluded that recreational impacts and air quality impacts to the SPA and SAC should be reviewed on a case-by-case basis, and concluded no likely significant effects. With regards to species, the Site was considered to support habitats suitable for protected and notable species; namely bats, birds and possibly great crested newt. The Parameter Plan demonstrates that the suitable habitats for those species shall be retained and therefore impacts on protected and notable species were considered to be negligible. Enhancements for these species have been included in the proposal, such as bat and bird boxes.

⁵ High Peak Habitats Regulations Assessment: <https://www.highpeak.gov.uk/media/3186/Habitats-Regulations-Assessment-Addendum>

APPENDIX C: COMMENTARY FROM RAPPOR CONSULTANTS

rappor



Talbot Road, Glossop

Derbyshire County Council

Transport Technical Note – Review and
Compliance with NPPF 2026

September 2026





Document Control

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Approved By		

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Rappor Consultants Ltd

A: Cubo, 3rd Floor, 6 Wellington Place, Leeds, LS1 4AP

W: www.rappor.co.uk

T: 07345 602611

E: hello@rappor.co.uk

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1 Review and Compliance with Transport Elements of NPPF 2026

August 2026 National Planning Policy Framework – Transport Related Policies

- 1.1 Chapter 15 of the August 2026 Framework contains the policies centred on transport and access. Other policies may overlap, such as development outside settlements but close to well-connected stations (S5, L3, GB7), but are not sufficiently engaged to be relevant to the Glossop site. The relevant transport decision-making policies are considered below.

Policy TR3 - Locating Development in Sustainable Locations

- 1.2 Policy TR3 requires development to support sustainable patterns of movement, provide good accessibility and make effective use of existing and proposed transport infrastructure. Where development generates significant movement, the policy seeks to limit the need to travel by private car and provide a genuine choice of transport modes, with significant adverse transport or highway safety impacts appropriately mitigated.

Development Response

- 1.3 The appeal site lies within the existing built-up area of Glossop. Bus stops are immediately adjacent to the site on Talbot Road and the submitted evidence identifies access to local services, facilities and Glossop railway station by sustainable modes. A Residential Travel Plan is proposed and can be secured by condition and be implemented in detail through reserved matters.

Evidence of Compliance

- 1.4 The proposal is therefore consistent with the locational and accessibility objectives of Policy TR3. The transport evidence also demonstrates that the proposal can be accommodated without a significant adverse effect on the efficient operation of the highway network or highway safety.

Policy TR4 - Street Design, Access and Parking

- 1.5 Policy TR4 requires transport considerations to be integral to development design, prioritising walking, wheeling and cycling, followed by public transport. It also requires safe and inclusive streets and routes, appropriate access for service and emergency vehicles and suitable parking provision.

Development Response

- 1.6 The appeal is in outline with only the principal points of access for determination. The principal vehicular access has been assessed and accepted by the Local Highway Authority. Additional details relating to pedestrian and cycle access were also considered acceptable by the Highway Authority, with their delivery capable of being secured by condition.

Evidence of Compliance

- 1.7 Detailed internal street design, parking, electric vehicle charging and cycle parking are matters capable of being addressed at reserved matters stage and/or by planning condition.



Nothing in the evidence before the appeal indicates that the development cannot be designed to comply with Policy TR4.

Policy TR6 - Assessing Transport Impacts

- 1.8 Policy TR6 requires proposals likely to generate significant movement to be supported by a proportionate Transport Statement or Transport Assessment and a Travel Plan. In assessing impacts, reasonable future scenarios, relevant times of day, cumulative effects, multimodal trip generation and the promotion of sustainable travel are to be considered.
- 1.9 Most importantly for decision-making, Policy TR6(4) states that development proposals should be refused where they would have a severe adverse impact on the transport network, in terms of capacity and congestion including cumulative impacts, or an unacceptable impact on highway safety, taking account of mitigation and wider network improvements.

Development Response

- 1.10 The appeal proposal has been supported by a Transport Assessment and Residential Travel Plan. The assessment considered trip generation, the operation of the local highway network, cumulative impacts, highway safety and sustainable accessibility. It was reviewed by the Local Highway Authority, which raised no objection.
- 1.11 The Transport Assessment assessed 110 dwellings, whereas the appeal seeks up to 100 dwellings. The assessment is therefore conservative in relation to the development now before the Inspector.

Evidence of Compliance

- 1.12 The evidence does not identify a severe adverse impact on the transport network or an unacceptable impact on highway safety. The statutory Highway Authority reached the same substantive conclusion in its assessment of the application. Accordingly, the refusal tests in Policy TR6(4) are not engaged on transport or highway safety grounds.

Policy TR8 - Public Rights of Way

- 1.13 Policy TR8 seeks to protect and enhance public rights of way and to take opportunities to extend, link or improve existing routes where this would improve access and connectivity.

Development Response

- 1.14 The appeal proposal retains the ability to provide pedestrian connections into the surrounding network and to secure detailed pedestrian and cycle access arrangements. There is no evidence that the proposal would result in an unacceptable adverse effect on the public rights of way network. Detailed layout at reserved matters stage provides the opportunity to secure appropriate permeability through the site.

Policy CC2 - Mitigation of Climate Change

- 1.15 In transport terms, Policy CC2 cross-refers to Policies TR3 and TR4 and seeks sustainable patterns of movement and good access to facilities so that the need to travel can be limited.

Development Response and Compliance

- 1.16 For the reasons set out above, the location of the appeal site and the availability of walking, cycling and public transport opportunities are consistent with these transport-related objectives.

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Cheltenham
Bristol
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Hereford
Cambridge



**APPENDIX D: COMMENTARY FROM ADEPT CONSULTING
ENGINEERS**

NATIONAL PLANNING POLICY FRAMEWORK (AUGUST 2026)

Flood Risk and Drainage Review

The proposed development is located within Flood Zone 1 and is therefore at low risk of flooding from rivers and the sea.

The updated National Planning Policy Framework has been reviewed from a flood risk and drainage perspective, with particular regard to Policy F4 (Assessing flood risk for decision-making), Policy F7 (Ensuring development is safe from flooding) and Policy F8 (Sustainable drainage systems and watercourses).

Policy F4 sets out the requirements for site-specific Flood Risk Assessments, including for relevant development within Flood Zone 1. Policy F7 requires development proposals not to present a risk from flooding to potential occupiers, users or visitors, or increase flood risk elsewhere. Policy F8 requires development proposals which could affect drainage on or around the site to incorporate Sustainable Drainage Systems (SuDS), proportionate to the nature and scale of the development, and requires these to be designed in accordance with the National Standards for Sustainable Drainage Systems.

The submitted Flood Risk Assessment and Drainage Strategy assess the relevant sources of flood risk and demonstrate how surface water runoff from the proposed development can be appropriately managed. The proposals are therefore considered to accord with Policies F4, F7 and F8 of the updated National Planning

Prepared by
Johann Zeuner Griffiths
Senior Civil Engineer
Adept Consulting Engineers

Leeds

Adept Consulting Engineers Ltd.
1912 Mill, Sunny Bank Mills
Leeds, LS28 5UJ
Tel: 0113 239 4518

Manchester

Adept Consulting Engineers Ltd.
4th Floor, 7 St James Square
Manchester, M2 6XX
Tel: 0161 974 0291

London

Adept Consulting Engineers Ltd.
140 Goswell Road,
London, EC1V 7DY
Tel: 020 3007 7497

Sheffield

Adept Consulting Engineers Ltd.
1 East Parade,
Sheffield S1 2ET
Tel: 0114 349 7119

Birmingham

Adept Consulting Engineers Ltd.
Griffin House, 18-19 Ludgate Hill,
Birmingham, B3 1DW
Tel: 0121 820 8809

Hull

Adept Consulting Engineers Ltd.
C4DI, @TheDock, 31-38 Queen
Street, Hull, HU1 1JU
Tel: 01482 770 155

