

HIGH PEAK LOCAL PLAN EARLY ENGAGEMENT RESPONSE FORM

Responses invited from 19th January 2023 to 5pm on 3rd March 2023

The Local Plan sets out detailed policies and specific proposals for the development and use of land in High Peak (outside of the Peak District National Park). Your feedback will help the Council to identify the issues and options for the Local Plan for consultation later in 2023.

Your Contact Details:

	Personal details	Agent's details (if applicable)
Title	Mr	Mr
Name	Richard Morton	Mark Eagland
Job title (if applicable)		
Organisation (if applicable)	KCS Development	Peacock + Smith
Address	C/O Agent	
Post code		
Telephone no.	7	
Email address		

PLEASE NOTE that responses must be attributable to named individuals or organisations. They will be held by the Council and will be available to view publicly and cannot be treated as confidential. Your contact details will not be published, but your name and organisation (if relevant) will. High Peak Borough Council maintains a database of consultees who wish to be kept informed about the Local Plan. Details of our data protection and Privacy Notice can be found on the council's website at: https://www.highpeak.gov.uk/YourData

Please complete and return this form by 5pm on 3rd March 2023

by email to: Idf@highpeak.gov.uk; or

by post to: Planning Policy, High Peak Borough Council, Town Hall, Buxton,

Derbyshire, SK17 6EL

Alternatively, you can respond online on the Local Plan consultation website https://highpeak-consult.objective.co.uk/kse.

Question 1 Do you agree with the Council's initial view of the emerging issues identified from the new evidence? (please select one answer) Yes No V If not, why?
Please see attached sheet(s)
Question 2 Should the next Local Plan have a new Spatial Vision? (please select one answer) Yes No No
If so, what should it say? Please see attached sheet(s)

Question 3 What should be the Strategic Objectives for the next Local Plan?

Please see attached sheet(s)
Question 4
Are there any other policies in the Local Plan that you think should be updated?
(please select one answer)
Yes v
No

Please specify which policy and how it should be updated.

Please see attached sheet(s)
Question 5
Are there any other new policies that you think the next Local Plan should
include? (please select one answer)
Yes
No
Please specify what the new policy should seek to address and why.
No comment

Question 6 What other evidence should the Council consider to inform the next Local Plan?

Please see attached sheet(s)	
Question 7 & 8 Do you have any site suggestions for hous	ing and / or employment?
If you would like to suggest several sites, please submit a separate form for each one.	
What is your interest in the site? (please select all that apply)	
Owner of the site	
Parish / Town Council	
Local resident	
Amenity / Community Group	
Planning Consultant	

Land Agent	
Developer	
Other	٧
Other (please specify)	
Site promoter – KCS Development. Please see attached submission Manchester Road, Tintwistle	on in respect of Land at
Are you the sole or part owner of the site? (please select one answer)	
Sole Owner	
Part Owner	
Neither	V
If you are not the landowner or the site is in multiple the name, address and contact details of the land ow provided	

If not the landowner, I confirm that the landowner/s have been informed of this site submission

(please select one answer)

Yes	V
No	
Does the owner(s) support the development of the site? (please select one answer)	
Yes	٧
No	
Site location (including grid reference and postcode if know	n)
Manchester Road, Tintwistle SK13 1NE	
Site Area (hectares)	
11 hectares	
Current Land Use(s) e.g. agriculture, employment, unused/va	acant etc.
Agricultural land	
Type of site e.g. greenfield, previously developed land/brown	nfield
Greenfield	

Please provide a site plan clearly identifying the exact boundaries of the site.

Please see attached submission by KCS Development	
Proposed Future Uses & Potential Site Capacity (please (please select all that apply)	specify)
Housing	٧
Employment	
Mixed-use (please specify uses) potential new community building and car parking for football club	V
Self-build & custom-build housing	
Basic Capacity Information – area/number of dwellings/units/proposed floorspace	number of
Approximately 90 dwellings, including a number of bungalows. Poter local need.	ntial care home, subject to
Market interest - please choose the most appropriate car indicate what level of market interest there is/has recent (please select all that apply)	
Site is owned by a developer	
Site is under option to a developer NB there is a promotion agreement in place rather than an option agreement – see further details below	V
Enquiries received/ strong interest	

Site is currently being marketed		
None		
Not Known		
Comments on market interest		
There is a promotion agreement in place for this site. The site is promoten an experienced residential site promoter.	ted by KCS Development,	
Utilities - Please tell us which of the following utilities are available to the site (please select all that apply)		
Mains water supply	V	
Mains sewerage	٧	
Electric supply	V	
Gas supply	V	
Public highway	٧	
Landline telephone/broadband internet	V	
Public Transport	V	
Other (please specify)		

Utilities – comments

The attached submission by KCS Development includes an access design. Bus s Manchester Road are within convenient walking distance of the site.	tops on
All utilities are available within the road network adjacent to the site.	
Constraints - Please tell us which of the following constraints a the site	re applicable to
(please select all that apply)	
Land in other ownership must be acquired to enable the site to be d	eveloped
Restrictive covenants exist	
Current land use(s) need to be relocated	
Physical constraints (topography, trees, other)	V
Flood Risk	
Infrastructure required	
Public rights of way cross or adjoin the site	
Land contamination	
Access constraints	
Environmental constraints	

Please provide any relevant information of likely measures to overcome the above constraints

Please see attached submission by KCS Developmen	nt
Timescales - Please indicate the approxima become available for development	ate timescale for when the site will
(please select one answer)	
Immediately	V
Up to 5 years	
5 - 10 years	
10 – 15 years	
Beyond 15 years	
Unknown	

Timescales comments – particularly if you have indicated that the site is not immediately available, please explain why
Other Relevant Information – Please use the space below for additional information
Please see attached submission by KCS Development
Question 9 Do you have any site suggestions for Local Green Spaces?
If you would like to suggest several sites, please submit a separate form for each
one.
Site location (including grid reference and postcode if known)

Please provide a si	te plan clearly ide	entifying the exa	act boundaries of	the site.
Location - Is the sit	e in reasonably c	close proximity t	to the community	it serves?

Local Significance - Is the site demonstrably special to a local community and holds a particular local significance, e.g. due to its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife?

Size / Scale - Is the site local in character and not an extensive tract of land?
If possible, please provide photographs of the site that support your
comments.
1

Question 10

Do you have any site suggestions for ecological improvements?

If you would like to suggest several sites, please submit a separate form for each

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Site location (including grid r	eference and po	stcode if knov	vn)
Please provide a site plan cle	early identifying t	the exact bour	ndaries of the site.
Do you own the site? (please select one answer)			
Yes (full ownership)			
Yes (part ownership)			
No			
Please specify if you also ow	n/control adjace	nt land.	

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Question 11 Do you have any site suggestions for renewable energy?

If you would like to suggest several sites, please submit a separate form for each one.

Site location (including grid reference a	nd postcode if known)
Please provide a site plan clearly identif	fying the exact boundaries of the site.
Please specify the proposed type and so (MW), Height to tip (m), Height to hub (m	
Do you own the site? (please select one answer)	
Yes (full ownership)	
Yes (part ownership)	
No	

How can the site be accessed? Are there any restrictions that may prevent access e.g. third party ownership?
Please specify known designations (ecological / environmental / historical) of or around the proposed site
Current land use (including agricultural land quality rating if relevant)
Proposed grid connection point (if known)

Question 12 Do you have any site suggestions for other uses that you think should be included in the Local Plan? What use is the site proposed for? Site location (including grid reference and postcode if known) Please provide a site plan clearly identifying the exact boundaries of the site. Do you own the site? (please select one answer) Yes (full ownership) Yes (part ownership) No

	ite be accessed? Are there any restrictions that may prevent rd party ownership?
Please specify or around the	known designations (ecological / environmental / historical) or proposed site
Current land u	se
Signature	Mark Eagland for Peacock+Smith
Date 28/2/2023	

Thank you for completing this response form.

MANCHESTER ROAD, TINTWISTLE



Outline Planning Case for Development (February 2023) (Revised)

1. Introduction

- 1.1 This note concerns land south of Manchester Road (A628), Tintwhistle. KCS Development has entered into an agreement with the owner of the land to promote it for housing in the High Peak Local Plan Review.
- 1.2 Peacock + Smith has been instructed by KCS Development to prepare this revised note setting out the case for the site to be allocated as a site for residential development. It follows an earlier note sent to the Council in October 2022.

2. The Site

2.1 The site comprises approximately 11 hectares of land on the western side of Tintwistle, south of Manchester Road (A628). The red line shown on the aerial photo below shows the full extent of the site boundaries, albeit it is not intended to develop all of this area for housing (please refer to Proposed Development at Section 7).



Site Location

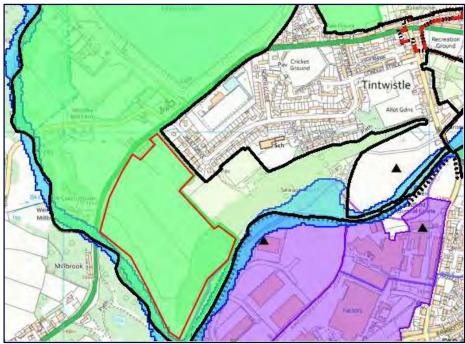
- 2.2 Part of the site is located behind ribbon residential development along Manchester Road, and a significant part is located adjacent to existing housing on West Drive. The remaining boundaries of the site are contained by dense woodland and West Drive Football Centre, which is home to Tintwistle Athletic Football Club.
- 2.3 The main central part of the site comprises agricultural land (pasture) and the south western and south-eastern parts comprise dense woodland. The topography of the site is generally level, but with a fall to the to the south west and south east.
- 2.4 There is an existing access track to the development from Manchester Road, east of a row of cottages fronting the road, albeit the intention is that a new vehicular access would be created west of the cottages.



- 2.5 The site is within easy walking distance of bus stops on Manchester Road which provide access to regular services to a range of destinations, including Manchester City Centre, Glossop, Hadfield, Ashton and Stalybridge (bus timetable attached at **Appendix 1**). It is also within walking distance of the range of facilities provided within Tintwistle, which include a primary school, convenience store, public house, hair salon, coffee shop/bakers, village hall, 2 churches, village recreation ground, cricket pitch and football ground.
- 2.6 The Council's online planning records confirm that there is no recent planning history to the site.

3. Adopted High Peak Local Plan

- 3.1 The adopted Local Plan provides a planning framework for planning decisions in the District over the period 2011 to 2031. The annual housing requirement over this period is 350 dwellings/annum.
- 3.2 The Local Plan Proposals Map (extract below) confirms that the site is not allocated for a particular purpose. It is designated as Green Belt and abuts the defined Built up Area Boundary (see black line) of Tintwistle to the east. The site is located outside the National Park.



Local Plan Proposals Map Extract

- 3.3 In the Local Plan Tintwistle is defined as a 'Larger Village' in the settlement hierarchy. **Policy S2** states that such settlements are locations where a moderate scale of development may be acceptable, consistent with meeting local rural needs and maintaining or enhancing their role, distinctive character or appearance whilst also maintaining existing facilities and services.
- 3.4 Despite the reference to moderate scale development in Larger Villages, no housing allocations were proposed in Tintwistle as part of the Local Plan. All development that has occurred over the plan period to date has taken place as part of unplanned windfall proposals.
- 3.5 A comprehensive Green Belt review was not carried out as part of the Local Plan, but opportunities were considered around towns and the larger villages. In this context a single



release of Green Belt was made at Furness Vale to provide for local housing needs on a housing allocation of 39 dwellings. Furness Vale is a defined Larger Village like Tintwistle.

4. Local Plan Review

- 4.1 The Council has committed to an update of the Local Plan. Consultation on an Early Engagement document is currently taking place.
- 4.2 In respect of housing growth, KCS Development is of the view that there are several reasons why the Council should adopt an annual housing requirement that is greater than the 260 dpa (dwellings per annum) generated by the Standard Housing Methodology (Standard Method). These are:
 - Firstly, the High Peak HELNA (2022) indicates that net housing delivery over the past 5 years has averaged 352 dpa, which is substantially in excess (i.e. some 40%) of the Standard Method. Planning Practice Guidance indicates that Authorities will need to take such situations into account when considering whether it is appropriate to plan for a higher level of need than the Standard Method suggests (Paragraph: 010 Reference ID: 2a-010-20201216). A housing requirement restricted to the Standard Method will represent a significant change to recent housing delivery in the District, therefore stifling housing choice, increasing house prices and restricting the ability of local people to get on the housing ladder.
 - Secondly, the HELNA shows that net affordable housing need in the District is between 228 and 270 dpa. This represents between 84% and 104% of the annual housing requirement provided by the Standard Method. Given that the affordable requirement of the current Local Plan is 30%, it is clear that there will be a very significant deficit in affordable provision if this requirement is maintained and housing growth is capped to the Standard Method. Assuming all schemes are able to provide for a policy compliant affordable contribution (which will not occur where there are viability issues with brownfield sites for example), then affordable provision would be just 78 dpa less than 34% of the lower end of the range of need identified in the HELNA.
 - Thirdly, the HELNA considers the implications of differing levels of job growth for housing need. Should the Council decide to adopt a pro jobs growth approach, then up to 364 dpa could be required. Planning Practice Guidance indicates that economic growth strategies may call for an increase in the housing requirement (Paragraph: 010 Reference ID: 2a-010-20201216).
- 4.3 In the light of the above, KCS urges the Council to carefully consider the merits of a housing requirement greater than the Standard Method. The existing Local Plan housing requirement is 350 dpa, and we consider that the Council should aspire to adopt a similar requirement in the new plan as a minimum.
- 4.4 In respect of affordable need, KCS notes that the Early Engagement document states that due to viability issues, it is highly unlikely that the net affordable need can be achieved in full. However, Para 60 of the NPPF states that it is important that the needs of groups with specific housing requirements are addressed. Para 78 also states that in rural areas planning policies should be responsive to local circumstances and support housing that reflects local needs.
- In this context we consider that the Local Plan Review should increase affordable housing delivery across the District as a priority. Furthermore, the Local Plan Review should recognise that viability issues are more likely to occur with brownfield housing sites. If the Local Plan Review is to make progress with addressing affordable need, then this will require some sensitively-planned greenfield development on the edge of existing settlements. Given that the Green Belt tightly constrains development in the northern settlements of the District, it will also



require some use of the Green Belt. We consider that a selective review of Green Belt sites suitable for residential development should be undertaken in that regard. Sites such as KCS' land at Tintwistle do not perform significant Green Belt purposes, but can help provide for housing needs in larger villages, and maintain the viability of rural settlements.

5. National Policy

Current NPPF

- 5.1 Para 79 of the NPPF (July 2022) states that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local; services.
- 5.2 Paras 92 to 93 of the NPPF promote healthy lifestyles and development of sports facilities and sports venue.
- 5.3 Para 142 of the NPPF states that where it is necessary to release Green Belt land for development, plans should give first consideration to land that has been previously-developed and/or is well-served by public transport.

Proposed Changes to the NPPF

- 5.4 The Government is currently undertaking a consultation proposing changes to the NPPF. If adopted, these indicate that the Standard Method is the advisory starting point when setting the housing requirement unless exceptional circumstances relating to the particular characteristics of an authority justify an alternative approach to assessing housing need. The requirement may be higher than the identified housing need, if it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment.
- A further change proposed is that Green Belt boundaries are not required to be reviewed and altered if this would be the only means of meeting the objectively assessed need for housing over the plan period. However, authorities would still have the ability to review and alter Green Belt boundaries if they wish, if they can demonstrate that exceptional circumstances exist.
- 5.6 There has been significant interest from the development industry in the proposed changes to the NPPF and it remains to be seen how concerns that have been expressed in representations to the Government will affect the final draft changes to the Framework.

6. The Opportunity for Development at the Subject Site

- 6.1 Tintwistle is recognised to be a sustainable location for modest development in the adopted Local Plan given its designation as a Larger Village in the settlement hierarchy.
- Notwithstanding the above, no allocations were provided in the settlement in the Local Plan. We consider that it is only through the allocation of land for housing development that there will be certainty of a reasonable choice of new housing in Tintwistle in the new Local Plan plan period.
- 6.3 The HELNA confirms that there is a significant requirement for affordable housing in the District. In practice this cannot be fully met without a significant uplift in overall housing delivery, but the Council should still be seeking to maximise the opportunity to deliver-affordable housing as far as possible.



- The new Local Plan Review can help provide for housing choice and affordable housing in Tintwistle through the allocation of land. This will also help to enhance the vitality of the settlement and local services, as encouraged by national planning policy.
- 6.5 Housing site options in Tintwistle are constrained by topography and the proximity of the settlement to the National Park. The greatest opportunity for development adjacent to the existing settlement is on the south western side of the settlement, which means that modest Green Belt release is necessary.
- Other than Green Belt, the central part of the subject site has limited physical and environmental constraints. It is in flood Zone 1 (the lowest zone of flood risk); it has few physical features other than hedgerow and a small number of trees, elements of which can be accommodated in new development; and the site has sufficient road frontage to provide a new safe and suitable access access, with appropriate visibility splays onto Manchester Road. As part of the access design new safe routes for pedestrians to cross the main road could be incorporated. The site is not a designated area of high landscape quality.
- 6.7 The ability to access the site directly from the A628 is considered to be a major benefit. Many of the existing roads within the settlement are historic and narrow with on street parking. Additional traffic on these local streets would likely cause both congestion and safety issues. It is noted that the A628 is a busy highway but a new development with a direct access to the road provides the opportunity for new junction arrangements which could work to slow traffic through the village improving air quality and the ability to access the distributor road. An investigation of possible access points to the site has been undertaken and a policy compliant access to the site has been identified (see **Appendix 2**) and is used within the draft site layout.
- 6.7 The site does not perform a significant Green Belt function. The very extensive tree belt located to the west and south of the site will ensure that development on the western side of Tintwistle does not lead to unrestricted sprawl and that the settlement does not merge into Hadfield or Hollingworth. Tintwistle is not a historic town where the setting and character could be affected by new development.
- Development of the site for housing would result in a degree of encroachment onto the countryside. However, there are very limited infill opportunites within the built up area of Tintwistle and it is only through well planned development on the edge of the settlement that a reasonable scale housing scheme can be provided that delivers affordable housing to help local people get on the housing ladder. Furthermore, the site benefits form a degree of containment by existing housing to the north and east, and it would appear as a logical extension to Tintwistle with strong structural tree belts to the west and south. In this context a housing development of the site would follow physical boundaries that are readily recognisable and permanent.
- 6.9 The housing needs assessment undertaken by the Council has also recognized the increasing age profile of the local area and the challenges this could bring about in the future. A number of bungalows suitable for older residents have been included within the initial draft layout but the site could also, subject to market demand, be a suitable location for retirement housing or a Care Home.
- 6.10 Whilst the site does not comprise previously-developed land, it would be well served by public transport given the regular bus services along Manchester Road, and so in accordance with Para 142 of the NPPF, such land is a first priority when considering Green Belt release.
- 6.11 There is also the potential for a development of the site to support sport and recreation in Tintwistle and healthy lifestyles, in accordance with Paras 92 to 93 of the NPPF. It would be well connected to the existing footpath network on the western side of the settlement, and it could accommodate new parking facilities for West Drive Football Centre, therefore assisting access to facilities at Tintwistle Athletic Football Club. An initial meeting has taken place with



the Football Club to discuss how new development may be able to assist the club through additional parking and potentially public open space contributions; further contact between Promoter and Club is expected. The development would also accommodate significant new public open space with equipped play facilities, which would be accessible to existing residents of Tintwistle.

- 6.12 Subject to demand, the site could accommodate a new community building. KCS has met with the Parish Council to discuss the site opportunity and how development could assist maintaining and enhancing local services. A new community building which could be sub divided and hired by service providers for services such as hair dressing, counselling, dance classes etc. has been suggested and is currently being considered. Further dialogue with the Parish Council is expected as the plan review progresses.
- 6.13 The existing use of the site for grazing is becoming more difficult and dangerous given the current lack of a suitable access into the land. Currently livestock needs to be guided across the A628 on a regular basis & this has obvious traffic management and safety issues. Using the field in the current manner is unlikely to be viable in the medium term which would leave the site unable to perform any beneficial function.

7.1 Proposed Development

- 7.1 We attach at **Appendix 3** an initial sketch concept for the site which shows how it could be developed for housing. We also include a Location Plan showing the site in the context of the surroundings.
- 7.2 The existing dense tree belts to the west and south of the site would be retained, thus ensuring that the functions of the Green Belt in respect of preventing sprawl and merging of settlements are retained. This leaves a central area of the site as the developable area, which relates well to the existing built form of Tintwistle. There is the scope to manage and enhance the woodland belts, thus promoting biodiversity net gain alongside public access. Additional areas of the site can be set aside to ensure that overall Biodiversity Net Gain is achieved.
- 7.3 A new priority access junction would be provided on the Manchester Road frontage, which would lead to a spine road into the development. Development would be set back behind a deep landscaped margin next to Manchester Road, thus providing an attractive approach to the scheme; respecting the rural character of the area; the visual gap between Tintwistle and Hollingworth and providing for biodiversity. The landscape margin also allows for extensive walking opportunities around the site, and ensures new housing is not adversely affected by noise and air pollution impacts of traffic using Manchester Road.
- 7.4 A new community facility building is located in the south east of the site linking to parking and proposed childrens play area.
- 7.5 A housing scheme of approximately 90 dwellings is shown comprising a mix of 2/3/4 bed houses and following consultation with local residents, a number of bungalows. This would represent an increase in the number of homes in Tintwistle of less than 15%. 30 dwellings would be affordable units, thus promoting housing opportunities for local people who are currently unable to get on the housing ladder.
- 7.6 To the south of the new homes a large area of public open space would be provided with an equipped play area for young children. The public open space would include new tree planting and footpaths for informal recreation. These would link into the existing footpath network around Tintwistle. To the south of the open space a surface water drainage attenuation basin is shown, which would be dry at most times, and provide for further biodiversity opportunities. The promoter of the site would seek early engagement with the Wild Peak Network to discuss how public open space and biodiversity net gain works could complement their work.



- 7.7 As development is set back from the adjacent main road there would be an opportunity to provide road side planting and landscaping which would help to counter air quality concerns which are an issue to local residents.
- 7.8 A new car parking area for West Drive Football Centre is shown on the south eastern side of the layout. This would be accessed from the new access onto Manchester Road and help relieve existing football club traffic currently using West Drive.

8. Potential Benefits for Tintwistle

- Certainty of provision of housing to meet local needs over the new Local Plan period, including a significant amount of affordable housing in a sustainable settlement where there are currently no allocations.
- Wide range of housing to serve different household types, including 2 bed homes for first time buyers and bungalows for older residents who might wish to downsize. Together with the possibility of retirement accommodation or a Care Home if this is justified by Local Need.
- Potential to provide a new community building for Tintwistle offering a range of services to local residents.
- Potential to provide parking for West Drive Football Centre, thus relieving traffic on West Drive.
- New public open space with equipped play facilities that will be available to existing residents of Tintwistle. New recreational trails allowing local residents access to green space where currently no access exists.
- Biodiversity opportunities and woodland management.
- Occupants of new homes will help support the viability of existing shops and services in Tintwistle.
- Improvements in highway safety if animals do not need to access the field.
- New access to the site could calm traffic speeds entering the village.
- Housing designed to cater for potential "working from home" retaining workers in the village through the day and increasing the use of local services.
- Housing built to the most up to date standards to minimize the carbon footprint of the development with each house having an electric car charging point.

Appendix 1

BUS TIMETABLE







Manchester/Ashton - Glossop Mon, Tue, Wed, Thur, Fri (not Bank Holidays)

Operated by: SMA Stagecoach Manchester

Timetable valid from 4 Sep 2022 until further notice

	Service: Operator:	237 SMA									
Ashton-under-Lyne Interchange (Stand K)	Depart:	SIVIA	SIVIA	SIVIA	05:42	06:04	06:29	06:54	07:15	07:42	08:09
Armentieres Square (Stop D)	Depart.	05:04	05:20	05:41	05:55	06:18	06:43	07:08	07:13	07:58	08:23
Old Road		05:15	05:31	05:52	06:08	06:32	06:57	07:00	07:47	08:15	08:35
Mottram Junction (Stop B)	-	05.15	00.01	00.02	00.00	00.52	00.57	01.22	07.47	00.10	00.55
Railway Station		05:27	05:43	06:06	06:25	06:49	07:14	07:39	08:04	08:29	08:49
Henry Street (Stop B)		05.27	05:52	06:17	06:37	07:01	07.14	07:51	00.04	00.25	00.49
Hurstbrook Close	Arrive:		05:56	06:22	06:42	07:06		07:56			
Henry Street (Stop C)	Arrive:	05:36	05.50	00.22	00.42	07.00	07:26	07.50	08:16	08:41	00:01
Henry Street (Stop C)	Allive.	05.50					07.20		00.10	00.41	09:01
	Service:	237	237	237	237	237	237	237	237	237	237
	Operator:	SMA									
Ashton-under-Lyne Interchange (Stand K)	Depart:	08:34	08:59	09:24	09:44	10:04	10:24	10:44	11:04	11:24	11:44
Armentieres Square (Stop D)	Dopuit.	08:48	09:13	09:38	09:58	10:18	10:38	10:58	11:18	11:38	11:58
Old Road		09:00	09:25	09:50	10:10	10:30	10:50	11:10	11:30	11:50	12:10
Mottram Junction (Stop B)	4	05.00	00.20	03.50	10.10	10.50	10.50	11.10	11.00	11.50	12.10
Railway Station		09:14	09:39	10:04	10:24	10:44	11:04	11:24	11:44	12:04	12:24
Henry Street (Stop B)		00.14	00.00	10.04	10.24	10.44	11.04	11.2-4	11.44	12.04	12.24
Hurstbrook Close	Arrive:										
Henry Street (Stop C)	Arrive:	09:26	09:51	10:16	10:36	10:56	11:16	11:36	11:56	12:16	12:36
Tiemy offeet (otop o)	Allive.	05.20	00.01	10.10	10.50	10.50	11.10	11.50	11.00	12.10	12.00
	Service:	237	237	237	237	237	237	237	237	237	237
	Operator:	SMA									
Ashton-under-Lyne Interchange (Stand K)	Depart:	12:04	12:24	12:44	13:04	13:24	13:44	14:04	14:24	14:46	15:09
Armentieres Square (Stop D)	Depait.	12:18	12:38	12:58	13:18	13:38	13:58	14:18	14:38	15:02	15:25
Old Road		12:30	12:50	13:10	13:30	13:50	14:10	14:30	14:50	15:18	15:41
Mottram Junction (Stop B)		12.50	12.50	13.10	13.30	13.30	14.10	14.50	14.50	13.10	15.41
Railway Station		12:44	13:04	13:24	13:44	14:04	14:24	14:44	15:04	15:35	15:58
		12.44	13.04	13.24	13.44	14.04	14.24	14.44	15.04	10.50	10.00
Henry Street (Stop B)	Assista										
Hurstbrook Close	Arrive:	40.50	40.40	40.00	40.50	44.40	44.00	44.50	45.40	45.47	40.40
Henry Street (Stop C)	Arrive:	12:56	13:16	13:36	13:56	14:16	14:36	14:56	15:16	15:47	16:10
	Carriani	007	227	007	227	227	227	227	227	007	227
	Service:	237	237	237	237	237	237	237	237	237	237
	Operator:	SMA									
Ashton-under-Lyne Interchange (Stand K)	Depart:	15:32	15:55	16:18	16:38	16:58	17:18	17:38	18:03	18:33	19:03
Armentieres Square (Stop D)		15:48	16:12	16:35	16:55	17:15	17:35	17:55	18:20	18:47	19:14
Old Road		16:04	16:29	16:52	17:12	17:32	17:52	18:12	18:37	18:59	
Mottram Junction (Stop B)		10.01	10.10				10.00		10.01	10.10	19:26
Railway Station		16:21	16:43	17:06	17:26	17:46	18:06	18:26	18:51	19:13	19:38
Henry Street (Stop B)							18:20	18:40	19:05	19:25	
Hurstbrook Close	Arrive:				14.14		18:25	18:45	19:10	19:30	
Henry Street (Stop C)	Arrive:	16:33	16:58	17:23	17:43	18:03					19:47
	0	227	007	007	007	007					
	Service:	237	237	237	237	237					
Achten under Lung Interchance (Ctard IC)	Operator:	SMA	SMA	SMA	SMA	SMA	-				
Ashton-under-Lyne Interchange (Stand K)	Depart:	19:45	20:45	21:45	22:45	23:31					
Armentieres Square (Stop D)		19:56	20:56	21:56	22:56	23:39					
Old Road		20.00	24.00	22.00	22.00	22.40	-				
Mottram Junction (Stop B)		20:08	21:06	22:06	23:06	23:49					
Railway Station		20:20	21:18	22:18	23:18	00:01					
Henry Street (Stop B)											
Hurstbrook Close	Arrive:										
Henry Street (Stop C)	Arrive:	20:29	21:27	22:27	23:27	00:10	3				

NOTE Timetable does not operate normally on: 19/09/2022





Glossop - Manchester/Ashton Mon, Tue, Wed, Thur, Fri (not Bank Holidays)

Operated by: SMA Stagecoach Manchester

Timetable valid from 4 Sep 2022 until further notice

	Service:	237	237	237	237	237	237	237	237	237	237
	Operator:	SMA	SMA	SMA	SMA	SMA	SMA	SMA	SMA	SMA	SMA
Henry Street (Stop A)	Depart:	05:55					07:38		08:33	08:58	09:23
Hurstbrook Close	Depart:		06:11	06:36	06:53	07:12		08:01			
Market Hall		05:55~	06:17	06:42	06:59	07:18	07:38~	08:08	08:33~	08:58~	09:23~
Railway Station		06:04	06:27	06:52	07:12	07:32	07:52	08:21	08:46	09:11	09:36
Old Road		06:18	06:44	07:12	07:35	08:00	08:20	08:44	09:04	09:29	09:54
Armentieres Square (Stop A)		06:29	06:55	07:23	07:47	08:12	08:32	08:54	09:14	09:39	10:04
Ashton-under-Lyne Interchange (Stand K)	Arrive:	06:37	07:07	07:37	08:02	08:27	08:47	09:07	09:27	09:52	10:17
	Service:	237	237	237	237	237	237	237	237	237	237
	Operator:	SMA	SMA	SMA	SMA	SMA	SMA	SMA	SMA	SMA	SMA
Henry Street (Stop A)	Depart:	09:48	10:13	10:38	11:03	11:23	11:43	12:03	12:23	12:43	13:03
Hurstbrook Close	Depart:	03.40	10.13	10.50	11.03	11.25	11.45	12.05	12.23	12.45	13.03
Market Hall	Depait.	09:48~	10.12	10.20-	11:03~	11.22	11:43~	12:03~	12:23~	12:43~	13:03~
Railway Station	- 4	10:01	10:13~	10:51	11:16	11:36	11:56	12:16	12:36	12:56	13:16
								12:34	12:54		
Old Road		10:19	10:44	11:09	11:34	11:54	12:14			13:14	13:34
Armentieres Square (Stop A)	A	10:29	10:54	11:19	11:44	12:04	12:24	12:44	13:04	13:24	13:44
Ashton-under-Lyne Interchange (Stand K)	Arrive:	10:42	11:07	11:32	11:57	12:17	12:37	12:57	13:17	13:37	13:57
	Service:	237	237	237	237	237	237	237	237	237	237
	Operator:	SMA	SMA	SMA	SMA	SMA	SMA	SMA	SMA	SMA	SMA
Henry Street (Stop A)	Depart:	13:23	13:43	14:03	14:23	14:43	15:08	15:33	15:58	16:23	16:48
Hurstbrook Close	Depart:										
Market Hall	200	13:23~	13:43~	14:03~	14:23~	14:43~	15:08~	15:33~	15:58~	16:23~	16:48~
Railway Station		13:36	13:56	14:16	14:36	14:57	15:22	15:47	16:12	16:37	17:02
Old Road		13:54	14:14	14:34	14:56	15:22	15:47	16:12	16:37	17:02	17:27
Armentieres Square (Stop A)		14:04	14:24	14:44	15:06	15:33	15:59	16:24	16:49	17:14	17:39
Ashton-under-Lyne Interchange (Stand K)	Arrive:	14:17	14:37	14:57	15:20	15:47	16:13	16:38	17:03	17:28	17:53
	Service:	237	237	237	237	237	237	237	237	237	237
	Operator:	SMA	SMA	SMA	SMA	SMA	SMA	SMA	SMA	SMA	SMA
Henry Street (Stop A)	Depart:	17:13	17:33	17:53	18:13	OWN	OWN	Olver	20:35	21:35	22:35
Hurstbrook Close	Depart:	17.15	17.00	17.55	10.10	18:31	18:56	19:36	20.00	21.00	22.00
Market Hall	Depait.	17:13~	17:33~	17.53~	18:13~		19:03	19:43	20:35~	21:35~	22:35~
Railway Station		17:27	17:47	18:07	18:26	18:49	19:14	19:54	20:44	21:44	22:44
Old Road		17:52	18:12	18:32	18:48	19:04	19:29	20:07	20:57	21:57	22:57
Armentieres Square (Stop A)		18:04	18:24	18:44	18:59	19:14	19:39	20:15	21:05	22:05	23:05
	A mirror										
Ashton-under-Lyne Interchange (Stand K)	Arrive:	18:18_	_18:38_	_18:58_	_19:12_	19:25_	19:50	20:25_	21:15	_22:15_	23:15
	Service:	237									
Harris Obract (Otrac A)	Operator:	SMA	-								
Henry Street (Stop A)	Depart:	23:35									
Hurstbrook Close	Depart:	00.05									
Market Hall		23:35~	Ş- 1								
Railway Station		23:44									
Old Road		23:57									
Armentieres Square (Stop A)		00:05									
Achten under Lyne Interchange (Stand K)	A rrive	00.15									

NOTE Timetable does not operate normally on: 19/09/2022

Ashton-under-Lyne Interchange (Stand K)

~ The time is not a timing point and is an estimate only.

Arrive:



Manchester/Ashton - Glossop Saturdays (not Bank Holidays)

Service 237

Operated by: SMA Stagecoach Manchester

Timetable valid from 4 Sep 2022 until further notice

	Service: Operator:	237 SMA									
Ashton-under-Lyne Interchange (Stand K)	Depart:	05:51	06:51	07:51	08:51	09:21	09:51	10:21	10:51	11:21	11:51
Armentieres Square (Stop D)		05:59	06:59	07:59	09:05	09:35	10:05	10:35	11:05	11:35	12:05
Old Road		06:07	07:10	08:10	09:17	09:47	10:17	10:47	11:17	11:47	12:17
Mottram Junction (Stop B)						TA CV		7.00			
Railway Station		06:20	07:23	08:23	09:31	10:01	10:31	11:01	11:31	12:01	12:31
Henry Street (Stop C)	Arrive:	06:29	07:32	08:32	09:43	10:13	10:43	11:13	11:43	12:13	12:43
	Service:	237	237	237	237	237	237	237	237	237	237
	Operator:	SMA									
Ashton-under-Lyne Interchange (Stand K)	Depart:	12:21	12:51	13:21	13:51	14:21	14:51	15:21	15:51	16:21	16:51
Armentieres Square (Stop D)	0.4.2.3	12:35	13:05	13:35	14:05	14:35	15:05	15:35	16:05	16:35	17:05
Old Road		12:47	13:17	13:47	14:17	14:47	15:17	15:47	16:17	16:47	17:17
Mottram Junction (Stop B)											
Railway Station		13:01	13:31	14:01	14:31	15:01	15:31	16:01	16:31	17:01	17:31
Henry Street (Stop C)	Arrive:	13:13	13:43	14:13_	14:43	15:13	15:43	16:13	16:43	17:13_	17:43
	Service:	237	237	237	237	237	237	237	237		
	Operator:	SMA									
Ashton-under-Lyne Interchange (Stand K)	Depart:	17:21	17:51	18:45	19:45	20:45	21:45	22:45	23:31		
Armentieres Square (Stop D)	125	17:35	18:03	18:56	19:56	20:56	21:56	22:56	23:39		
Old Road		17:47	18:15								
Mottram Junction (Stop B)				19:08	20:08	21:06	22:06	23:06	23:49		
Railway Station		18:00	18:28	19:20	20:20	21:18	22:18	23:18	00:01		
Henry Street (Stop C)	Arrive:	18:09	18:37	19:29	20:29	21:27	22:27	23:27	00:10		



Service 237

Glossop - Manchester/Ashton Saturdays (not Bank Holidays)

Operated by: SMA Stagecoach Manchester

Timetable valid from 4 Sep 2022 until further notice

	Service: Operator:	237 SMA									
Henry Street (Stop A)	Depart:	06:48	07:48	08:48	09:48	10:18	10:48	11:18	11:48	12:18	12:48
Railway Station	Dopuit	06:57	07:57	08:57	10:00	10:30	11:00	11:30	12:00	12:30	13:00
Old Road		07:10	08:10	09:10	10:20	10:50	11:20	11:50	12:20	12:50	13:20
Armentieres Square (Stop A)		07:20	08:20	09:20	10:30	11:00	11:30	12:00	12:30	13:00	13:30
Ashton-under-Lyne Interchange (Stand K)	Arrive:	07:29	08:29	09:29	10:42	11:12	11:42	12:12	12:42	13:12	13:42
	Service:	237	237	237	237	237	237	237	237	237	237
	Operator:	SMA									
Henry Street (Stop A)	Depart:	13:18	13:48	14:18	14:48	15:18	15:48	16:18	16:48	17:18	17:48
Railway Station	45, 43	13:30	14:00	14:30	15:00	15:30	16:00	16:30	17:00	17:30	18:00
Old Road		13:50	14:20	14:50	15:20	15:50	16:20	16:50	17:20	17:50	18:18
Armentieres Square (Stop A)		14:00	14:30	15:00	15:30	16:00	16:30	17:00	17:30	18:00	18:28
Ashton-under-Lyne Interchange (Stand K)	Arrive:	14:12	14:42	15:12	15:42	16:12	16:42	17:12	17:42	18:12	18:39
	Service:	237	237	237	237	237	237	237			
	Operator:	SMA									
Henry Street (Stop A)	Depart:	18:18	18:48	19:35	20:35	21:35	22:35	23:35	7.0		
Railway Station		18:30	19:00	19:44	20:44	21:44	22:44	23:44			
Old Road		18:48	19:18	19:57	20:57	21:57	22:57	23:57			
Armentieres Square (Stop A)		18:58	19:28	20:05	21:05	22:05	23:05	00:05			
Ashton-under-Lyne Interchange (Stand K)	Arrive:	19:09	19:39	20:15	21:15	22:15	23:15	00:15			



Service 237

Manchester/Ashton - Glossop Sundays and Some Bank Holidays

Operated by: SMA Stagecoach Manchester

Timetable valid from 4 Sep 2022 until further notice

	Service: Operator:	237 SMA									
Ashton-under-Lyne Interchange (Stand K)	Depart:			08:31	09:31	10:31	11:31	12:31	13:31	14:31	15:31
Armentieres Square (Stop D)		06:39	07:39	08:41	09:43	10:43	11:43	12:43	13:43	14:43	15:43
Mottram Junction (Stop B)		06:50	07:50	08:52	09:55	10:55	11:55	12:55	13:55	14:55	15:55
Railway Station		07:03	08:03	09:05	10:08	11:08	12:08	13:08	14:08	15:08	16:08
Henry Street (Stop B)		07:12	08:12	09:14	10:17	11:17	12:17	13:17	14:17	15:17	16:17
Hurstbrook Close	Arrive:	07:17	08:17	09:19	10:22	11:22	12:22	13:22	14:22	15:22	16:22
Henry Street (Stop C)	Arrive:	- 111 -							- 11		
	Service: Operator:	237 SMA									
Ashton-under-Lyne Interchange (Stand K)	Depart:	16:31	17:31	18:31	19:51	20:51	21:51	22:51	23:31	-	
Armentieres Square (Stop D)	20,000	16:43	17:41	18:41	19:59	20:59	21:59	22:59	23:39		
Mottram Junction (Stop B)		16:55	17:52	18:52	20:07	21:07	22:07	23:07	23:47		
Railway Station	- 196	17:08	18:05	19:05	20:19	21:19	22:19	23:19	23:59		
Henry Street (Stop B)		17:17									
Hurstbrook Close	Arrive:	17:22									
Henry Street (Stop C)	Arrive:		18:14	19:14	20:28	21:28	22:28	23:28	00:08	-	

NOTE Timetable does not operate normally on: 19/09/2022



Service 237

Glossop - Manchester/Ashton Sundays and Some Bank Holidays

Operated by: SMA Stagecoach Manchester

Timetable valid from 4 Sep 2022 until further notice

	Service: Operator:	237 SMA									
Hurstbrook Close	Depart:	07:30	08:30	09:30	10:30	11:30	12:30	13:30	14:30	15:30	16:30
Henry Street (Stop A)	Depart:										
Market Hall		07:37	08:37	09:37	10:37	11:37	12:37	13:37	14:37	15:37	16:37
Railway Station		07:46	08:46	09:46	10:46	11:46	12:46	13:46	14:46	15:46	16:46
Old Road		07:59~	08:59~	09:59~	10:59~	11:59~	12:59~	13:59~	14:59~	15:59~	16:59~
Old Road		07:59	08:59	09:59	10:59	11:59	12:59	13:59	14:59	15:59	16:59
Armentieres Square (Stop A)		08:10	09:10	10:10	11:10	12:10	13:10	14:10	15:10	16:10	17:10
Ashton-under-Lyne Interchange (Stand K)	Arrive:	08:20	09:22	10:22	11:22	12:22	13:22	14:22	15:22	16:22	17:22
	Service:	237	237	237	237	237	237	237			
	Operator:	SMA									
Hurstbrook Close	Depart:	17:30			100	1113					
Henry Street (Stop A)	Depart:		18:23	19:33	20:33	21:33	22:33	23:33			
Market Hall		17:37	18:23~	19:33~	20:33~	21:33~	22:33~	23:33~			
Railway Station		17:46	18:32	19:42	20:42	21:42	22:42	23:42			
Old Road		17:59~	18:45~	19:56	20:55	21:55	22:55	23:55			
Old Road		17:59	18:45								
Armentieres Square (Stop A)		18:10	18:56	20:07	21:03	22:03	23:03	00:03			
Ashton-under-Lyne Interchange (Stand K)	Arrive:	18:20	19:04	20:15	21:11	22:11	23:11	00:11			

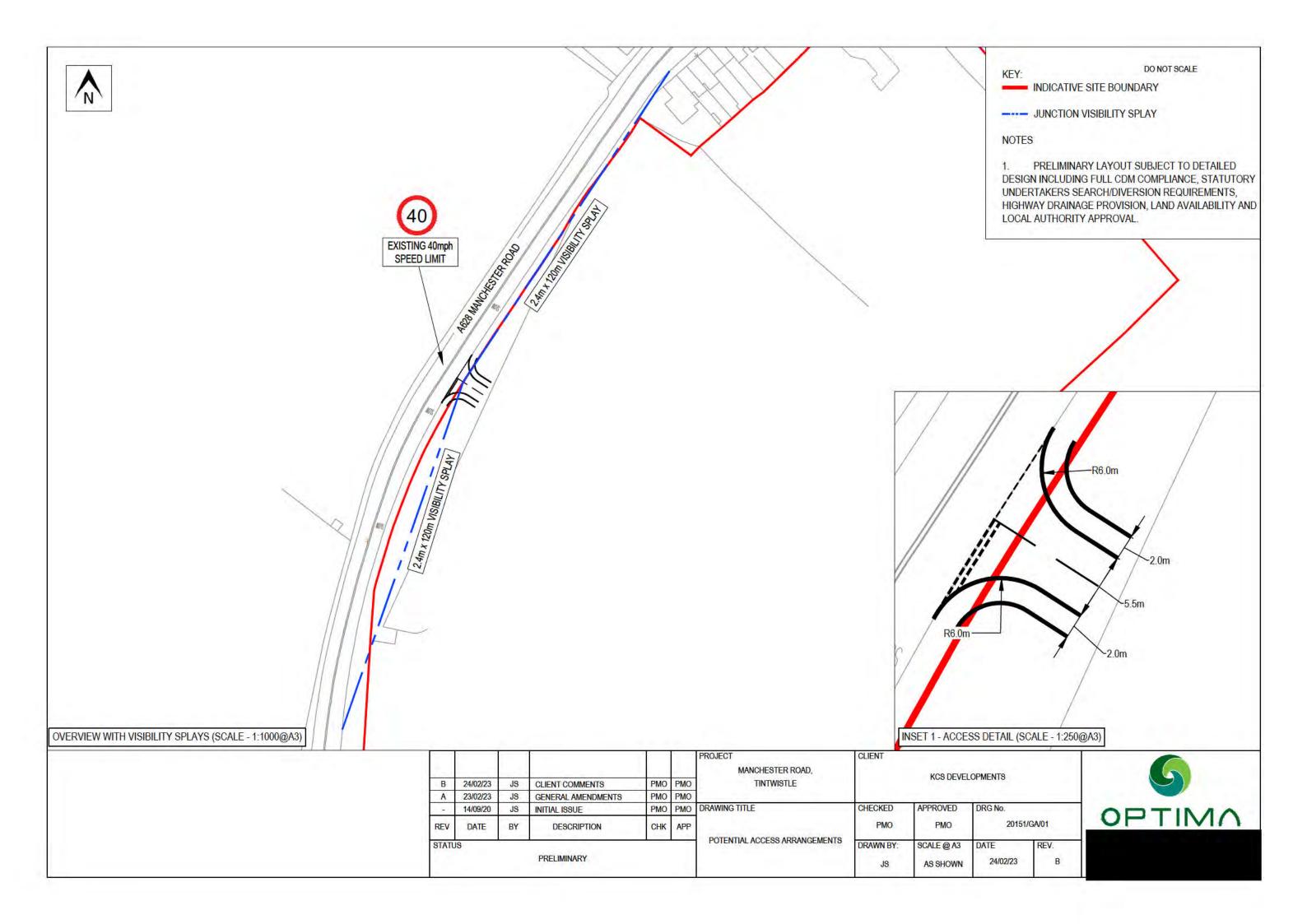
NOTE Timetable does not operate normally on: 19/09/2022

The time is not a timing point and is an estimate only.

Appendix 2

ACCESS DESIGN





Appendix 3 LOCATION PLAN AND SKETCH CONCEPT PLAN









Consultee

Email Address

Address

Event Name

Comment by

Comment ID

Response Date

Consultation Point

Status

Submission Type

Version

Question 1

If not, why?

Do you agree with the Council's initial view of the

emerging issues identified from the new evidence?

Mrs Keeley Jeanne Keeley (809557)



High Peak Local Plan - Early Engagement

Mrs Keeley Jeanne Keeley (809557)

LPEA1

23/01/23 13:46

Question 1 (View)

Submitted

Web

8.0

No

Not all of them. Where affordable housing is mentioned it should be recognised that houses are only "affordable" to a first time buyer once and on resale are not "affordable" and they are not available at all if they are allowed to be bought by investors and then used as a buy to let opportunity. eg the houses on new mills road completed a couple of years ago. Rented properties are often rented out at very expensive rates which can be far above what local people doing local jobs can afford. Therefore "affordable houses" are also only affordable in terms of mortgage affordability rather than rent affordability. Any affordable housing should be subject to management by housing schemes or the council to ensure they remain an affordable housing option for local people.

Question 7 & 8

If you would like to suggest several sites, please submit a separate form for each one.

What is your interest in the site? (please tick all that apply)

Proposed Future Uses & Potential Site Capacity (please specify)

Market interest - please choose the most appropriate category below and indicate what level of market interest there is/has recently been in the site.

Utilities - Please tell us which of the following utilities are available to the site (please tick all that apply)



Consultee Mrs Keeley Jeanne Keeley (809557)

Email Address

Address

Event Name High Peak Local Plan - Early Engagement

Comment by Mrs Keeley Jeanne Keeley (809557)

Comment ID LPEA2

Response Date 23/01/23 13:47

Consultation Point Question 3 (View)

Status Submitted

Submission Type Web

Version 0.4

Question 3

What should be the Strategic Objectives for the next Local Plan?

Not all of them. Where affordable housing is mentioned it should be recognised that houses are only "affordable" to a first time buyer once and on resale are not "affordable" and they are not available at all if they are allowed to be bought by investors and then used as a buy to let opportunity. eg the houses on new mills road completed a couple of years ago. Rented properties are often rented out at very expensive rates which can be far above what local people doing local jobs can afford. Therefore "affordable houses" are also only affordable in terms of mortgage affordability rather than rent affordability. Any affordable housing should be subject to management by housing schemes or the council to ensure they remain an affordable housing option for local people.

Question 7 & 8

If you would like to suggest several sites, please submit a separate form for each one.

What is your interest in the site? (please tick all that apply)

Proposed Future Uses & Potential Site Capacity (please specify)

Market interest - please choose the most appropriate category below and indicate what level of market interest there is/has recently been in the site.

Utilities - Please tell us which of the following utilities are available to the site (please tick all that apply)



Consultee

Email Address

Address

Event Name

Comment by

Comment ID

Response Date

Consultation Point

Status

Submission Type

Version

Question 4

Are there any other policies in the Local Plan that you think should be updated?

Please specify which policy and how it should be updated.

we could do with a swimming pool at Chapel leisure centre

Question 7 & 8

If you would like to suggest several sites, please submit a separate form for each one.

What is your interest in the site? (please tick all that apply)

Proposed Future Uses & Potential Site Capacity (please specify)

Market interest - please choose the most appropriate category below and indicate what level of market interest there is/has recently been in the site.

Utilities - Please tell us which of the following utilities are available to the site (please tick all that apply)

Mrs Keeley Jeanne Keeley (809557)



High Peak Local Plan - Early Engagement

Mrs Keeley Jeanne Keeley (809557)

LPEA3

23/01/23 13:47

Question 4 (View)

Submitted

Web

0.6



Consultee Mrs Keeley Jeanne Keeley (809557)

Email Address

Address

Event Name High Peak Local Plan - Early Engagement

Comment by Mrs Keeley Jeanne Keeley (809557)

Comment ID LPEA4

Response Date 23/01/23 13:48

Consultation Point Question 6 (View)

Status Submitted

Submission Type Web

Version 0.4

Question 6

What other evidence should the Council consider to inform the next Local Plan?

Where affordable housing is mentioned it should be recognised that houses are only "affordable" to a first time buyer once and on resale are not "affordable" and they are not available at all if they are allowed to be bought by investors and then used as a buy to let opportunity. eg the houses on new mills road completed a couple of years ago. Rented properties are often rented out at very expensive rates which can be far above what local people doing local jobs can afford. Therefore "affordable houses" are also only affordable in terms of mortgage affordability rather than rent affordability. Any affordable housing should be subject to management by housing schemes or the council to ensure they remain an affordable housing option for local people.

Question 7 & 8

If you would like to suggest several sites, please submit a separate form for each one.

What is your interest in the site? (please tick all that apply)

Proposed Future Uses & Potential Site Capacity (please specify)

Market interest - please choose the most appropriate category below and indicate what level of market interest there is/has recently been in the site.

Utilities - Please tell us which of the following utilities are available to the site (please tick all that apply)



Consultee

Email Address

Address

Event Name

Comment by

Comment ID

Response Date

Consultation Point

Status

Submission Type

Version

Question 5

Are there any other new policies that you think the next Local Plan should include?

Please specify what the new policy should seek to address and why.

Stop building on green field sites /farm land. Use brownfield sites as on the outskirts of Glossop. These can be cleared of derelict buildings so the look better and also reduce the amount of open spaces used for housing

Question 7 & 8

If you would like to suggest several sites, please submit a separate form for each one.

What is your interest in the site? (please tick all that apply)

Proposed Future Uses & Potential Site Capacity (please specify)

Market interest - please choose the most appropriate category below and indicate what level of market interest there is/has recently been in the site.

Mrs Keeley Jeanne Keeley (809557)



High Peak Local Plan - Early Engagement

Mrs Keeley Jeanne Keeley (809557)

LPEA5

23/01/23 13:50

Question 5 (View)

Submitted

Web

0.5

Yes

Utilities - Please tell us which of the following utilities are available to the site (please tick all that apply)



Consultee Mrs Keeley Jeanne Keeley (809557)

Email Address

Address

Event Name High Peak Local Plan - Early Engagement

Comment by Mrs Keeley Jeanne Keeley (809557)

Comment ID LPEA6

Response Date 23/01/23 13:55

Consultation Point Question 7 (View)

Status Submitted

Submission Type Web

Version 0.5

Question 7 & 8

If you would like to suggest several sites, please submit a separate form for each one.

What is your interest in the site? (please tick all that apply) . Local resident

Are you the sole or part owner of the site? Neither

If not the landowner, I confirm that the landowner/s have No been informed of this site submission

Does the owner(s) support the development of the site? No

Site location (including grid reference and postcode if known)

There is some old industrial land near the reservoir on the set valley trail (it is situated at the back of the chemical company). This could be used for industrial or housing use or as a tourism opportunity as it is so close to the set valley trail.

Type of site e.g. greenfield, previously developed land/brownfield

brownfield

Please provide a site plan clearly identifying the exact boundaries of the site.

Keeley Site Suggestion.pdf

Proposed Future Uses & Potential Site Capacity (please specify)

HousingEmployment

. Mixed-use (please specify uses)

Market interest - please choose the most appropriate category below and indicate what level of market interest there is/has recently been in the site.

Not Known

Utilities - Please tell us which of the following utilities are available to the site (please tick all that apply)

Constraints - Please tell us which of the following constraints are applicable to the site (please tick all that apply)

Timescales - Please indicate the approximate timescale for Unknown when the site will become available for development



Consultee Mrs Keeley Jeanne Keeley (809557)

Email Address

Address

Event Name High Peak Local Plan - Early

Engagement

Comment by Mrs Keeley Jeanne Keeley (809557)

Comment ID LPEA7

Response Date 23/01/23 13:56

Consultation Point Question 8 (View)

Status Submitted

Submission Type Web

Version 0.1

Question 7 & 8

If you would like to suggest several sites, please submit a separate form for each one.

What is your interest in the site? (please tick all that apply) . Other

Are you the sole or part owner of the site? Neither

Proposed Future Uses & Potential Site Capacity (please specify)

Market interest - please choose the most appropriate category below and indicate what level of market interest there is/has recently been in the site.

Utilities - Please tell us which of the following utilities are available to the site (please tick all that apply)

The set valley trail is marked as the Pennine bridle way.

The picture is between hayfield and new mills

I have drawn in red round the area I suggested.

It is visible from the sett valley trail and looks like concrete hard standing left over from buildings being demolished.

Thanks

Jeanne





HIGH PEAK LOCAL PLAN EARLY ENGAGEMENT RESPONSE FORM

Responses invited from 19th January 2023 to 5pm on 3rd March 2023

The Local Plan sets out detailed policies and specific proposals for the development and use of land in High Peak (outside of the Peak District National Park). Your feedback will help the Council to identify the issues and options for the Local Plan for consultation later in 2023.

Your Contact Details:

	Personal details	Agent's details (if applicable)
Title	Mr	Mrs
Name	R Lomas	Caroline Payne
Job title (if applicable)		
Organisation (if applicable)	Lomas Distribution	Emery Planning Partnership
Address	c/o agent	
Post code		
Telephone no.		
Email address		

PLEASE NOTE that responses must be attributable to named individuals or organisations. They will be held by the Council and will be available to view publicly and cannot be treated as confidential. Your contact details will not be published, but your name and organisation (if relevant) will. High Peak Borough Council maintains a database of consultees who wish to be kept informed about the Local Plan. Details of our data protection and Privacy Notice can be found on the council's website at: https://www.highpeak.gov.uk/YourData

Please complete and return this form by **5pm** on **3rd March 2023**

by email to: ldf@highpeak.gov.uk; or

by post to: Planning Policy, High Peak Borough Council, Town Hall, Buxton,

Derbyshire, SK17 6EL

Alternatively, you can respond online on the Local Plan consultation website https://highpeak-consult.objective.co.uk/kse.

Question 1 Do you agree with the Council's initial view of the emerging issues identified from the new evidence? (please select one answer) Yes
No N
If not, why?
See attached statement.
Question 2 Should the next Local Plan have a new Spatial Vision? (please select one answer)
Yes Y No
If so, what should it say?
See attached statement

Question 3 What should be the Strategic Objectives for the next Local Plan?

See attached statement.
Question 4
Are there any other policies in the Local Plan that you think should be updated?
(please select one answer)
Yes A
No

See attached statement	
Question 5	
Are there any other new policies that you think include?	the next Local Plan should
(please select one answer)	
Yes	
No	
Please specify what the new policy should see	k to address and why.
See attached statement.	

Please specify which policy and how it should be updated.

Question 6

What other evidence should the Council consider to inform the next Local Plan?

See attached statement.	
Question 7 & 8 Do you have any site suggestions for housing and /	or employment?
If you would like to suggest several sites, please submit one.	a separate form for each
What is your interest in the site? (please select all that apply)	
Owner of the site	Υ
Parish / Town Council	
Local resident	
Amenity / Community Group	
Planning Consultant	

Land Agent	
Developer	
Other	
Other (please specify)	
Are you the sole or part owner of the site? (please select one answer)	
Sole Owner	Υ
Part Owner	
Neither	
If you are not the landowner or the site is in multiple ow the name, address and contact details of the land owne provided	
If not the landowner, I confirm that the landowner/s hav site submission (please select one answer)	e been informed of this
Yes	

No
Does the owner(s) support the development of the site? (please select one answer)
Yes
No
Site location (including grid reference and postcode if known)
Land at Waterswallows Road, Buxton (grid reference: SK08536 75193)
Site Area (hectares)
9.9 hectares approx. for proposed allocation. 5.5 hectares approx. proposed extension to Primary Employment Zone.
Current Land Use(s) e.g. agriculture, employment, unused/vacant etc.
Former quarry and haulage yard.
Type of site e.g. greenfield, previously developed land/brownfield

Please provide a site plan clearly identifying the exact boundaries of the site

See attached statement.	
Proposed Future Uses & Potential Site Capac (please select all that apply)	city (please specify)
Housing	
Employment	Υ
Mixed-use (please specify uses)	
Self-build & custom-build housing	
Basic Capacity Information – area/number of units/proposed floorspace	dwellings/number of
Unknown at present	
Market interest - please choose the most app indicate what level of market interest there is (please select all that apply)	
Site is owned by a developer	У
Site is under option to a developer	
Enquiries received/ strong interest	
Site is currently being marketed	

None	
Not Known	Υ
Comments on market interest	
Utilities - Please tell us which of the following u (please select all that apply)	ıtilities are available to the site
Mains water supply	Υ
Mains sewerage	Υ
Electric supply	Υ
Gas supply	Y
Public highway	Y
Landline telephone/broadband internet	Y
Public Transport	Y
Other (please specify)	

Utilities – comments	
Constraints - Please tell us which of the following constra	sinte are annlicable to
the site (please select all that apply)	inits are applicable to
Land in other ownership must be acquired to enable the site to	o be developed
Restrictive covenants exist	n
Current land use(s) need to be relocated	n
Physical constraints (topography, trees, other)	n
Flood Risk	n
Infrastructure required	n
Public rights of way cross or adjoin the site	n
Land contamination	n
Access constraints	n
Environmental constraints	n

Please provide any relevant information of likely measures to overcome the above constraints

See attached statement.	
Timescales - Please indicate the approximate become available for development (please select one answer)	ate timescale for when the site will
Immediately	
Up to 5 years	У
5 - 10 years	
10 – 15 years	
Beyond 15 years	
Unknown	

Timescales comments – particularly if you have indicated that the site immediately available, please explain why	is not
n/a	
Other Relevant Information – Please use the space below for additiona nformation	I
See attached statement.	
Question 9	
o you have any site suggestions for Local Green Spaces?	
f you would like to suggest several sites, please submit a separate form for one.	each
Site location (including grid reference and postcode if known)	
Please see attached statement.	

Please provide a site plan clearly identifying the exact boundaries of the site.				
Location - Is the s	ite in reasonably	/ close proxim	ity to the comm	unity it serves?

Local Significance - Is the site demonstrably special to a local community and holds a particular local significance, e.g. due to its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife?

Size / Scale - Is the site local in character and not an extensive t	ract of land?
Size / Scale - is the site local in character and not an extensive t	ract or land?
	VOUR
If nossible please provide photographs of the site that support	
If possible, please provide photographs of the site that support	your
If possible, please provide photographs of the site that support comments.	your
	you
	you.
	you
	you
	you
	you
	youi
	you

Question 10

Do you have any site suggestions for ecological improvements?

If you would like to suggest several sites, please submit a separate form for each

one.	please submit a separate form for each
Site location (including grid reference a	and postcode if known)
n/a	
Please provide a site plan clearly identi	ifying the exact boundaries of the site
Do you own the site? (please select one answer)	
Yes (full ownership)	
Yes (part ownership)	
No	
Please specify if you also own/control	adjacent land.

How can the site be accessed? Are there any restrictions that may prevent access e.g. third party ownership?
Please specify the current land use.
If the land is in any existing ecological schemes, please specify until when.
Please provide any details of factors affecting the site (e.g. flooding issues, topography, notable species possibly present on site etc.)

Question 11 Do you have any site suggestions for renewable energy?

If you would like to suggest several sites, please submit a separate form for each one.

Site location (including grid reference and postcode if known)

Please see attached statement.	
Please provide a site plan clearly identifying the exact I	ooundaries of the site.
Please specify the proposed type and scale of energy of (MW), Height to tip (m), Height to hub (m))	levelopment (Capacity
Do you own the site?	
(please select one answer) Yes (full ownership)	У
Yes (part ownership)	
No	

No.	
Please specify known designations (ecological / environmental / historical) or around the proposed site	on
SSSI to west of site.	
Current land use (including agricultural land quality rating if relevant)	
Current land use (including agricultural land quality rating if relevant) Former quarry.	
Former quarry.	
Former quarry.	

How can the site be accessed? Are there any restrictions that may prevent access e.g. third party ownership?

Question 12

Do you have any site suggestions for other uses that you think should be included in the Local Plan?

What use is t	the site _l	proposed	for?
---------------	-----------------------	----------	------

Yes, our client's land at Hazelcroft Garage, Tom Tho roadside service facilities to serve the A6.	rn, Fairfield, SK17 7HP is proposed for
Site location (including grid reference and	postcode if known)
Hazelcroft Garage, Tom Thorn, Fairfield, SK17 7HP	
Please provide a site plan clearly identifyi	ng the exact boundaries of the site.
See supporting statement	
Do you own the site?	
(please select one answer)	
Yes (full ownership)	У
Yes (part ownership)	
No	

How can the site be accessed? Are there any restrictions that may prevent access e.g. third party ownership?
Access from A6.
Please specify known designations (ecological / environmental / historical) or or around the proposed site
None
Current land use
B8 haulage and distribution
SignatureEmery Planning
Date03/03/2023

Thank you for completing this response form.





Project: 23-058

Site Address: High Peak Local Plan Representations 2023

Client: Lomas Distribution Ltd

Date: 02 March 2023 Author: Caroline Payne

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Contents

1.	Introduction	1
2.	Response to Policies	2

Appendices

- **EP1.** Site plan Waterswallows Road
- **EP2.** Site plan Hazelcroft Garage



1. Introduction

- 1.1 These representations are submitted on behalf of Lomas Distribution to the High Peak Local Plan Early Engagement Consultation.
- 1.2 Lomas Distribution is a long standing, successful company in the High Peak. Established in 1984, Lomas Distribution specialises in transporting bulk powders, aggregates and liquids. The company has a fleet of 350 vehicles and 450 employees.
- 1.3 The company relocated from its former main site in Harpur Hill to Waterswallows Industrial Estate, in 2007. The businesses head offices are located on the industrial estate and all vehicle service and repair takes place on this site. Lomas Distribution also operate from the former Goodwin and Forbes site situated immediately to opposite the main headquarters and planning permission was granted for the change of use of the former redundant quarry site at Waterswallows to form a haulage park for up to 130 trailers and vehicles also opposite the Waterswallows industrial estate. Lomas Distribution also operate from two other sites in the Buxton locality at Hillhead, Harpur Hill (75 vehicles) and Dew Pond Lane, Fairfield (15 vehicles).
- 1.4 Lomas Distribution is a major haulier of Tarmac with other key clients including Cemex, Hanson and Veolia.
- 1.5 Lomas Distribution has a number of land interests in the borough. These representations focus on the delivery of employment land and the future of business within the borough.

2. Response to Policies

Question 1: Do you agree with the Council's initial view of the emerging issues from the new evidence? If not, why?

- 2.1 No.
- 2.2 In respect of employment, section 2 of the Early Engagement document states that Policy S4 regarding employment needs was found to be out of date due to new evidence. It states that around 30 hectares of land has been identified as being needed to support the economy in High Peak up to the year 2041. This is lower than the current Local Plan need figure of 45 hectares.
- 2.3 This statement conflicts with the summary of the key findings of the High Peak Housing and Economic Land Needs Assessment (2022) set out on page 15 of the Early Engagement document which are copied below and accepts that the need could be as high as 54 ha:
 - There is little to no need for additional office floorspace.
 - There continues to be a demand in Buxton and Glossop for industrial units small industrial estates serve a stable market.
 - The Borough has a relative scarcity of smaller Industrial sites between 2,000 and 3,000 sq. ft. per unit and that these are the units most in demand.
 - Based on an assessment of a variety of demographic and economic scenarios, the likely overall need for employment land is within the range of 25-34ha. However, based on past trends, the need could be as high as 54ha.

(our emphasis)

- 2.4 We have reviewed the Housing and Economic Land Needs Assessment (HELNA). This assesses the future employment space requirements on the basis of 8 scenarios.
- 2.5 The report indicates that based on monitoring data provided by the council that over the 14 year period from 2007/8 to 2020/21, the gross completions for B-Class uses in High Peak amounted to 1.98 ha per annum. Losses per annum have averaged 0.56ha over the same period resulting in a net gain of 1.42 ha per annum. If past trends were replicated in the future, trending forward an annual requirement of 1.42 could justify the provision of 28.42ha (net) over the next 20 years in High Peak. Paragraph 7.70 considers that the 1.42ha long term annual past take up rate represents a realistic figure going forward over the remainder of the plan period.

2.6 The final gross figures for each of the scenarios are shown in table 7.20 below. This includes a reasonable allowance to provide for some flexibility for provision of losses but avoids over provision of land.

Table 7.20 High Peak Gross Employment Land Comparisons 2021-2041

		Offices / R&D (ha)	Light Industrial (ha)	General Industrial (ha)	Warehousing (ha)	Total (ha)
	Net	0.84	0.93	-3.84	8.17	6.10
1) Experian December	+ Flexibility Factor	0.88	0.93	-1.39	8.64	9.06
2021 Baseline	+ Loss Replacement	2.56	3.74	12.73	12.51	31.54
	Net	0.20	-0.74	-6.43	6.64	-0.32
2) Experian pre-Covid	+ Flexibility Factor	0.24	-0.74	-3.98	7.11	2.64
March 2020 Baseline	+ Loss Replacement	1.92	2.06	10.15	10.99	25.11
	Net	0.66	0.64	-4.04	7.58	4.84
3) CE / Experian Midpoint	+ Flexibility Factor	0.70	0.64	-1.58	8.04	7.79
	+ Loss Replacement	2.37	3.44	12.54	11.92	30.27
	Net	1.08	1.11	-2.30	8.17	8.06
4) Policy On	+ Flexibility Factor	1.13	1.11	0.15	8.64	11.02
	+ Loss Replacement	2.80	3.91	14.27	12.51	33.50
	Net	0.84	0.93	-3.84	8.18	6.11
5) <u>Labour</u> Force under SM2 (260 dpa)	+ Flexibility Factor	0.88	0.93	-1.39	8.64	9.07
	+ Loss Replacement	2.56	3.74	12.73	12.52	31.55
	Net	-0.10	-0.37	-4.98	4.67	-0.78
6) 2014-based SNPP MYE	+ Flexibility Factor	-0.06	-0.37	-2.53	5.14	2.18
	+ Loss Replacement	1.61	2.44	11.59	9.01	24.66
7) 2018-based SNPP MYE	Net	0.89	1.02	-3.78	8.35	6.48
	+ Flexibility Factor	0.94	1.02	-1.33	8.82	9.44
	+ Loss Replacement	2.61	3.82	12.79	12.69	31.92
	Net	0.43	-1.12	24.51	4.65	28.48
8) Past Take Up	+ Flexibility Factor	0.48	-1.12	26.96	5.11	31.44
	+ Loss Replacement	2.15	1.69	41.08	8.99	53.91

2.7 The scenarios range from a low of 24.66ha (scenario 6 2014-based SNPP) to the past take up figure of 54.91ha (scenario 8). The other 6 scenarios cluster between 25-34 ha. The report states at paragraph 7.91 that:

These are lower than the findings of the 2014 ELR Demand Update, which identified a need for between 40 ha and 80 ha, which no doubt reflects the lower level of growth in recent years and the influence of the pandemic and Brexit.

2.8 The HELNA goes onto state at paragraph 14.12 that:

The selection of the final employment land requirements will depend upon the preferred level of employment growth for the Borough and the extent to which this aligns with the Council's economic aspirations and housing targets, including the need to reduce net out commuting.

- 2.9 In terms of future supply, paragraphs 7.105 of the HELNA refer to the High Peak Strategic Housing and Employment Land Availability Assessment of July 2022 (SHELAA). The SHELAA does not appear to be publicly available and we have not been able to review its contents.
- 2.10 The HELNA states that the SHELAA shows that there are a total of 21 potential sites extending to 59.4 ha that make up the forward supply. This comprises 15 previously developed sites totalling 33.2ha and 6 greenfield sites totalling 26.2 ha. Table 7.24 of the HELNA shows the theoretical capacity of the sites.
- 2.11 This includes 9 hectares of previously developed land at Waterswallows Road, Buxton. No plan is provided and it is not therefore possible to identify the 9 hectares of previously developed land referred to at Waterswallows Road. Our client's land referred to throughout these representations comprises previously developed land at Waterswallows. As we have not been able to review the document, it is unclear whether this is included within the SHELAA.

2.12 The report concludes that:

The demand side assessment indicates that High Peak Borough requires between 25 ha and 54 ha of employment land over the 20-year plan period to 2041. Accepting that the SHELAA has a slightly earlier base period (2020 rather than 2021), the forward supply of 59.4 ha would, theoretically, appear to be of a sufficient scale to meet even the upper end of the range, although there is of course no guarantee that all the identified source of supply would necessarily come forward for that use.

- 2.13 We consider that scenario 8 reflects a realistic scenario based on take up rates over a period with a lower level of growth. This should be the minimum economic target in order to proactively encourage sustainable economic growth and regeneration and reduce out-commuting.
- 2.14 We consider that Scenario 8 is the minimum level of employment land allocated that should be selected and this is supported by the identified source of supply to date. Further flexibility should be incorporated into the new plan to accommodate employment needs that are not currently anticipated. As such we consider that the proposed employment figure should be at least 54 hectares.

Question 2: Should the next Local Plan have a new Spatial Vision? If so, what should it say?

2.15 Yes, to be determined once all background evidence to hand.

Question 3: What should be the Strategic Objectives for the next Local Plan?

2.16 In terms of employment, the next Local Plan should set out a clear economic vision and strategy for the area which proactively encourages sustainable economic growth and regeneration and seeks to reduce out-communiting. This should include flexibility for employment needs that are not currently anticipated.

Question 4: Are there any other policies in the Local Plan that you think should be updated? Please specify which policy and how it should be updated.

2.17 Policy E3: Primary Employment Zones should be updated to reflect the grant of planning permissions during the plan period. In particular, the Primary Employment Zone at Waterswallows should be amended to include the land subject to planning permission HPK/2019/0376 for B8 use (3.9 hectares) and also land used by our client for B8 purposes at the existing Goodwin and Forbes site (1.59 hectares). This land is already in employment use and this would simply represent the circumstances on the ground.

Question 5: Are there any new policies that you think the next Local Plan should include? Please specify what the policy should seek to address and why.

2.18 This is not applicable to these representations.

Question 6: What other evidence should the Council consider to inform the next Local Plan?

- 2.19 Section 3 of the early engagement document, pages 21 to 30 list various reports that are ongoing or will be undertaken in order to inform the next Local Plan. These reports should be finalised prior to the next stage of engagement.
- 2.20 Of particular interest to our client is the A6 Corridor Study. This is the key transport route into an out of Buxton and our client is dependent upon this for the successful operation of the business.
- 2.21 We note that the Borough Council is working with adjoining authorities to review the Corridor Study. As part of the review of key transportation issues, we consider that this should look at the provision of service facilities along the A6. It is our understanding that there is little in the way of roadside services providing refreshments and w.c. facilities along this main arterial route. Our client has a site which could meet this need.

Question 7: Do you have any site suggestions for housing?

2.22 This is not applicable to these representations.



Question 8: Do you have any site suggestions for employment?

- 2.23 Yes.
- 2.24 Our client's landholding at Waterswallows extends to the existing headquarters of Lomas Distribution which falls within the existing Primary Employment Zone, 1.59 hectares of land comprising the former Goodwin and Forbes site which is within the open countryside but has a long established use for B8 employment purposes, 3.9 hectares of land with planning permission for the parking of haulage vehicles by Lomas Distribution (B8) and a further 9.9 hectares of land within the former quarry.

Planning history

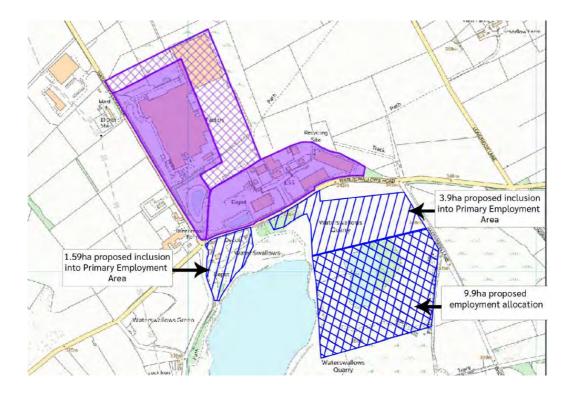
- 2.25 Relevant planning history can be summarised as follows:
 - Construction of 6 silos (HPK/2020/0563) approved 30 September 2021
 - Change of use of former redundant quarry site to form haulage park for Lomas Distribution for up to 130 trailers and vehicles (HPK/2019/0376) approved 10 November 2020
 - Installation of gas fuelled 20mw short term operating reserve electivity generation facility (amendment to planning permission HPK/2016/0509)(HPK/2017/0084) – approved 21 April 2017
 - 20 megawatt short term operating reserve electricity generation installation of land forming part of former Waterswallows Quarry (HPK/2016/0509) approved 3 November 2016
 - 20 megawatt short term operating reserve electricity generation installation of land forming part of former Waterswallows Quarry (HPK/2016/0511) approved 3 November 2016
 - Retrospective application for temporary storage of building stone (HPK/2007/0152) approved 25 April 2007
 - Change of use of redundant quarry to leisure (diving) facilities (HPK/2007/0547) Approved 8
 October 2007
 - Form 50 space car park for leisure facility (HPK/2008/0629) refused 16 December 2008
 - Retention of coating plant facilities, importation of stone of exhaustion of reserves and erection of replacement office and weighbridge (HPK/0003/5798) withdrawn 10 March 1998

Proposed allocation

2.26 As set out above, the existing Lomas Distribution site at Waterswallows falls within the Primary Employment Zone (PEZ) under Policy E3 of the 2016 Local Plan. PEZs are defined in the Local Plan as industrial areas which currently provide a significant number of local jobs and present no serious environmental problems. Primary Employment Zones are focal points for most new industrial and business developments and activity during the plan period.



- 2.27 We consider that the former Goodwin and Forbes site and the site subject to planning permission HPK/2019/0376 should be included within the Primary Employment Zone as these sites have an existing employment use. It is also proposed that the wider parcel of land within the quarry is identified as an employment allocation.
- 2.28 The land proposed for an employment allocation is located within the grounds of the former Waterswallows quarry, a large-scale stone quarry and processing plant which was closed and decommissioned in the late 1990s. No restoration or rehabilitation of the quarry has taken place and it has stood empty for many years.
- 2.29 There are existing landscaped grassed bunds surrounding the site. Due to the variation in ground levels within and around the site, activity within the former quarry is not visible from the public highway.
- 2.30 No restoration or rehabilitation of the quarry took place after it was decommissioned in the late 1990s and there was no provision for restoration through development management procedures. The surface of the land is hard, compacted MOT and gravel. The site has the appearance of a former quarry with manmade gradient and features which are not sympathetic to the character of the locality. It cannot be said that the remains of the structures have blended into the quarry. The former use is very clearly visible within its surroundings. We therefore consider the land to be previously developed in accordance with the definition in the Glossary to the Framework.
- 2.31 The site proposed for allocation is set in an area that is characterized by industrial development. It is a logical site for further employment development in terms of proximity to existing industrial and commercial uses in the adjacent Primary Employment Zone, the previously developed nature of the site and its historical use for employment. A site plan is provided at Appendix 1 and an extract is provided below:



Question 9: Do you have any site suggestions for Local Green Spaces?

2.32 Not applicable to these representations.

Question 10: Do you have any site suggestions for ecological improvements?

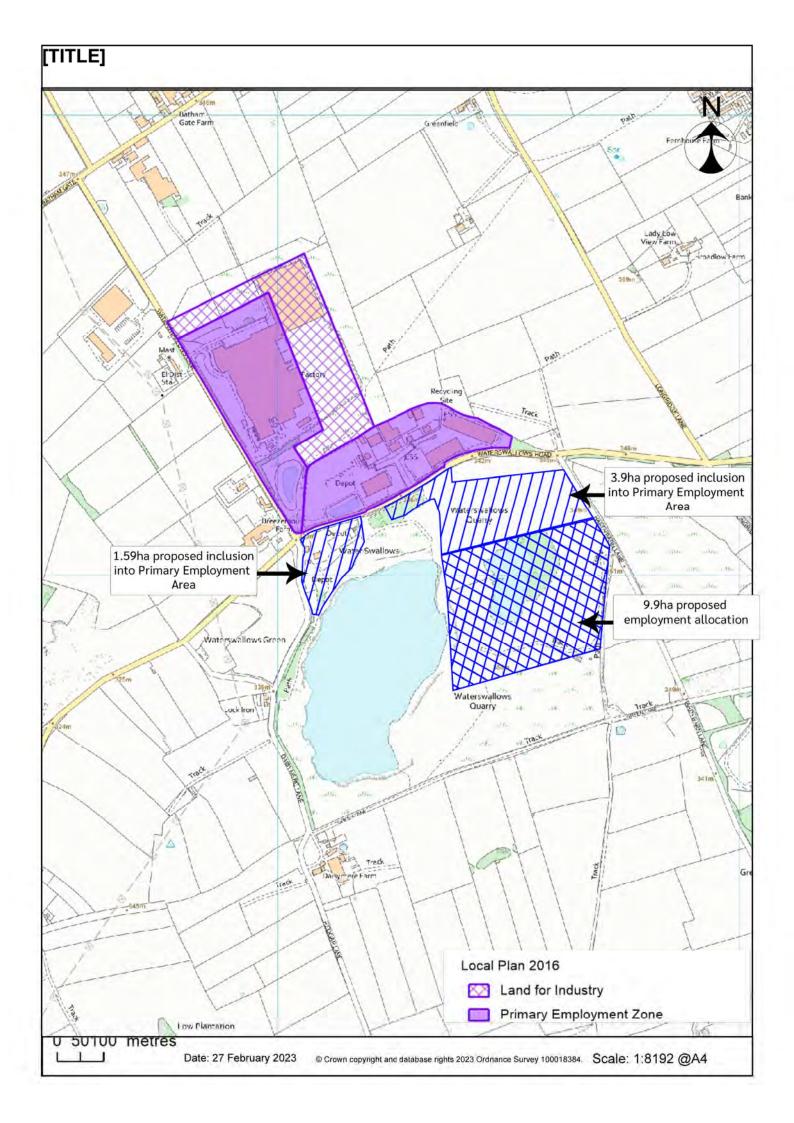
2.33 Our client has a wide landholding across the southern part of the borough and would be willing to engage with the local planning authority in relation to the creation of a biodiversity bank for offsetting opportunities for both biodiversity net gain and nutrient neutrality.

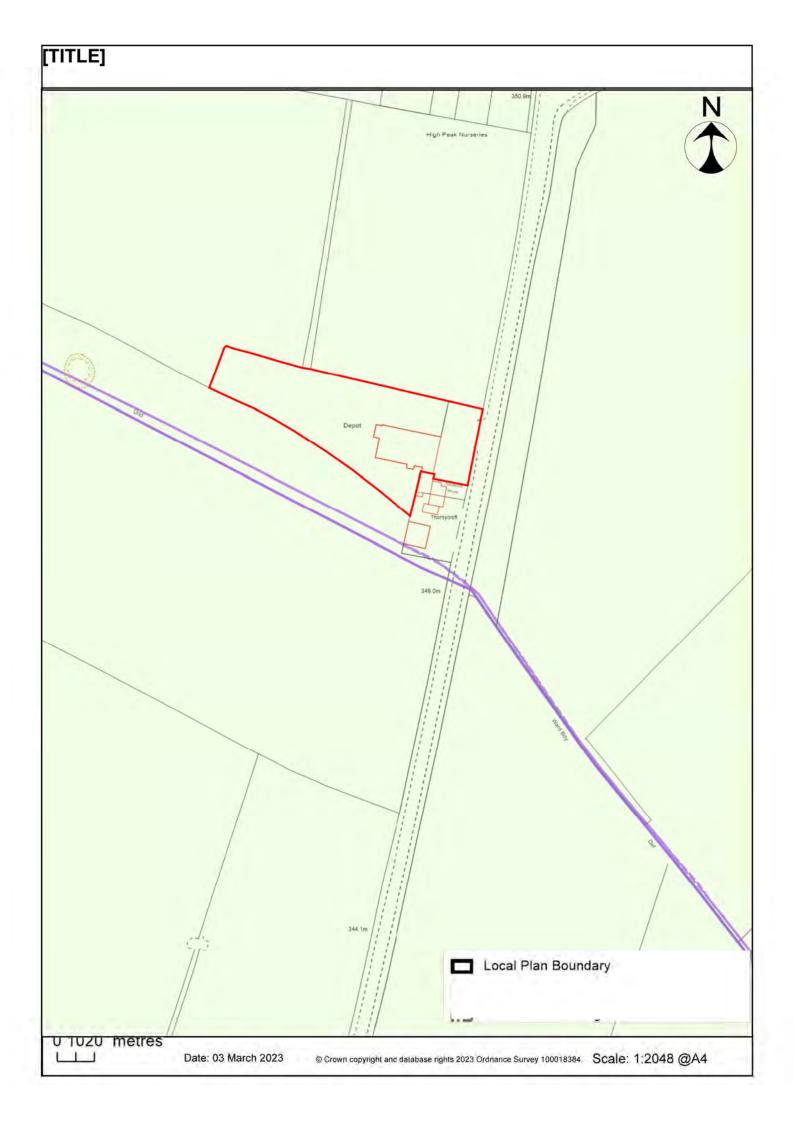
Question 11: Do you have any site suggestions for renewable energy?

2.34 Our client's land at Waterswallows would also be well suited for development for renewable energy purposes alongside traditional employment purposes. Lomas Distribution would be willing to engage with the local planning authority in this regard.

Question 12: Do you have any site suggestions for other uses that you think should be included in the Local Plan?

2.35 Yes. As set out above, we consider that the evidence base to the Local Plan should consider key transport infrastructure in particular the need for roadside services to provide food, drink and w.c. facilities along the A6. There is little in the way of roadside services providing refreshments and w.c. facilities along this main arterial route through the High Peak. Our client has recently purchased Hazelcroft Garage, Tom Thorn, Buxton, an established commercial garage specializing in the haulage of aggregates and blocks with substantial hardstanding suitable for parking of vehicles. The site is ideally placed to provide service facilities for users of the A6.











Comment

Agent Natasha Styles (1335101)

Email Address

Address

Consultee Natasha Styles (1335103)

Email Address

Company / Organisation The Planning Bureau on behalf of McCarthy Stone

Address

Event Name High Peak Local Plan - Early Engagement

Comment by The Planning Bureau on behalf of McCarthy Stone

(Natasha Styles - 1335103)

Comment ID LPEA83

Response Date 03/03/23 09:50

Consultation Point Question 6 (View)

Status Submitted

Submission Type Web

Version 0.13

Question 5

Are there any other new policies that you think the Yes

next Local Plan should include?

Please specify what the new policy should seek to address and why.

Question 6

What other evidence should the Council consider to inform the next Local Plan?

What other evidence should the Council consider to inform the next Local Plan?

In particular the council should undertake a new viability assessment. We would like to remind the Council that the viability of specialist older persons' housing is more finely balanced than 'general needs' housing and we are strongly of the view that these housing typologies should be robustly assessed in the forthcoming Local Plan Viability Assessment. This would accord with the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG which states that. "A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period. If this is not done, the delivery of much needed specialised housing for older people may be significantly delayed with protracted discussion about other policy areas such as affordable housing policy requirements which are wholly inappropriate when considering such housing need.

Question 7 & 8

If you would like to suggest several sites, please submit a separate form for each one.

What is your interest in the site? (please tick all that apply)

Proposed Future Uses & Potential Site Capacity (please specify)

Market interest - please choose the most appropriate category below and indicate what level of market interest there is/has recently been in the site.

Utilities - Please tell us which of the following utilities are available to the site (please tick all that apply)

Constraints - Please tell us which of the following constraints are applicable to the site (please tick all that apply)



Comment

Agent Natasha Styles (1335101)

Email Address

Address

Consultee Natasha Styles (1335103)

Email Address

Company / Organisation The Planning Bureau on behalf of McCarthy Stone

Address

Event Name High Peak Local Plan - Early Engagement

Comment by The Planning Bureau on behalf of McCarthy Stone

(Natasha Styles - 1335103)

Comment ID LPEA314

Response Date 03/03/23 16:08

Consultation Point Question 5 (View)

Status Submitted

Submission Type Web

Version 0.15

Question 5

Are there any other new policies that you think the Yes next Local Plan should include?

Please specify what the new policy should seek to address and why.

Summary of response

The best approach for the Local Plan is to:

- 1 Allocate specific sites to meet the needs of older people that are in the most sustainable locations close to key services.
- 2 Include a standalone policy actively supporting the delivery of specialist older people's housing in the Market Towns and Larger Villages and other locations with good access to services and facilities for older people.

- Developers of older peoples housing schemes should not be required to demonstrate need given the benefits that developments bring.
- . Viability of specialist older persons' housing is more finely balanced than general needs housing.
- Need it is clear there will be a significant increase in older people over the Plan Period and the provision of suitable housing and care to meet the needs of this demographic should be a priority of the emerging Local Plan.

Benefits of Older persons' housing:

- Economic reduced risk of health challenges contributing to fiscal saving to the NHS and social care services. Retirement properties create more local economic value and more local jobs than any other type of residential development. Retirement housing releases under-occupied family housing and plays a very important role in recycling of housing stock.
- Social Opportunities to enable residents to be as independent as possible in a safe and warm environment. Retirement housing helps to reduce anxiety and worry by providing housing which is safe and secure and reduces management and maintenance concerns.
- Environmental More efficient use of land therefore reducing the need to use limited land resources for housing. Providing housing in close proximity to services and shops which can be easily access on foot therefore reducing the need for travel. Providing shared facilities for a large number of residents in one building makes more efficient use of material and energy resources.

Should be noted that ensuring residents have the ability to stay in their homes for longer through the provision of wheelchair housing is not in itself an appropriate manner of meeting the needs of older people. Adaptable houses do not provide the on-site support care and companionship of specialist older persons' housing, do not release under occupied family housing or help savings to the public purse.

Question 7 & 8

If you would like to suggest several sites, please submit a separate form for each one.

What is your interest in the site? (please tick all that apply)

Proposed Future Uses & Potential Site Capacity (please specify)

Market interest - please choose the most appropriate category below and indicate what level of market interest there is/has recently been in the site.

Utilities - Please tell us which of the following utilities are available to the site (please tick all that apply)

Constraints - Please tell us which of the following constraints are applicable to the site (please tick all that apply)



Comment

Consultee Adele Metcalfe (1334485)

Email Address

Address

Event Name High Peak Local Plan - Early Engagement

Comment by Adele Metcalfe (1334485)

Comment ID LPEA35

Response Date 20/02/23 20:28

Consultation Point Question 1 (View)

Status Submitted

Submission Type Web

Version 0.23

Question 1

Do you agree with the Council's initial view of the emerging Yes issues identified from the new evidence?

Question 2

Should the next Local Plan have a new Spatial Vision? Yes

If so, what should it say?

Deliver nature recovery

Question 3

What should be the Strategic Objectives for the next Local Plan?

Accessible green spaces

Question 4

Are there any other policies in the Local Plan that you think No should be updated?

Question 5	
Are there any other new policies that you think the next Local Plan should include?	No
Question 7 & 8	
If you would like to suggest several sites, please submit a separa	ate form for each one.
What is your interest in the site? (please tick all that apply)	. Local resident
Are you the sole or part owner of the site?	Neither
Proposed Future Uses & Potential Site Capacity (please specify)	
Market interest - please choose the most appropriate category below and indicate what level of market interest there is/has recently been in the site.	
Utilities - Please tell us which of the following utilities are available to the site (please tick all that apply)	
Constraints - Please tell us which of the following constraints are applicable to the site (please tick all that apply)	
Question 9	
If you would like to suggest several sites, please submit a separa	ate form for each one.
Site location (including grid reference and postcode if know	vn)
Roughfields	
Location - Is the site in reasonably close proximity to the co	ommunity it serves?
Local Significance - Is the site demonstrably special to a local significance, e.g. due to its beauty, historic significance, reclied), tranquillity or richness of its wildlife?	
Recreational and wildlife	
Size / Scale - Is the site local in character and not an extens Local	ive tract of land?
Do you own the site?	No



HIGH PEAK LOCAL PLAN EARLY ENGAGEMENT RESPONSE FORM

Responses invited from 19th January 2023 to 5pm on 3rd March 2023

The Local Plan sets out detailed policies and specific proposals for the development and use of land in High Peak (outside of the Peak District National Park). Your feedback will help the Council to identify the issues and options for the Local Plan for consultation later in 2023.

Your Contact Details:

	Personal details	Agent's details (if applicable)
Title		
Name		
Job title (if applicable)		
Organisation (if applicable)	J.E. Morten Limited	Emery Planning Partnership
Address	c/o agent	
Post code		
Telephone no.		
Email address		

PLEASE NOTE that responses must be attributable to named individuals or organisations. They will be held by the Council and will be available to view publicly and cannot be treated as confidential. Your contact details will not be published, but your name and organisation (if relevant) will. High Peak Borough Council maintains a database of consultees who wish to be kept informed about the Local Plan. Details of our data protection and Privacy Notice can be found on the council's website at: https://www.highpeak.gov.uk/YourData

Please complete and return this form by **5pm** on **3rd March 2023**

by email to: ldf@highpeak.gov.uk; or

by post to: Planning Policy, High Peak Borough Council, Town Hall, Buxton,

Derbyshire, SK17 6EL

Alternatively, you can respond online on the Local Plan consultation website https://highpeak-consult.objective.co.uk/kse.

Question 1 Do you agree with the Council's initial view of the emerging issues identified from the new evidence? (please select one answer)
Yes
No N
If not, why?
See attached statement.
Question 2 Should the next Local Plan have a new Spatial Vision? (please select one answer)
Yes Y No
If so, what should it say?
See attached statement

Question 3 What should be the Strategic Objectives for the next Local Plan?

See attached statement.
Question 4
Are there any other policies in the Local Plan that you think should be
updated?
(please select one answer)
Yes A
No

See attached statement	
Overtion F	
Question 5 Are there any other new policies that you think the next Local Plan	should
include?	
(please select one answer)	
Yes	
res	
A/-	
No	
Discourse of the control of the cont	_
Please specify what the new policy should seek to address and wh	ıy.
See attached statement.	

Please specify which policy and how it should be updated.

Question 6

What other evidence should the Council consider to inform the next Local Plan?

See attached statement.	
See attached statement.	
Question 7 & 8 Do you have any site suggestions for housing	ng and / or employment?
If you would like to suggest several sites, pleas one.	e submit a separate form for each
What is your interest in the site? (please select all that apply)	
Owner of the site	Υ
Parish / Town Council	
Local resident	
Amenity / Community Group	
Planning Consultant	

Land Agent	
Developer	
Other	
Other (please specify)	
Are you the sole or part owner of the site? (please select one answer)	
Sole Owner	Υ
Part Owner	
Neither	
If you are not the landowner or the site is in multiple ow the name, address and contact details of the land owner provided	
If not the landowner, I confirm that the landowner/s have site submission (please select one answer)	e been informed of this
Yes	

No	
Does the owner(s) support the development of the site? (please select one answer)	
Yes	
No	
Site location (including grid reference and postcode if known)	
Land at Newfield Garage, Tunstead Milton, Sk23 7ER (grid reference: SK031800)	
Site Area (hectares)	
1.7 approx	
Current Land Use(s) e.g. agriculture, employment, unused/vacant etc	: .
Grassland.	
Type of site e.g. greenfield, previously developed land/brownfield	
Part previously developed (storage) and part greenfield.	

Please provide a site plan clearly identifying the exact boundaries of the site

See attached statement.	
Proposed Future Uses & Potential Site Capacity (plea	ase specify)
(please select all that apply)	acc cpccity,
Housing	
Employment	Υ
Mixed-use (please specify uses)	
Self-build & custom-build housing	
Basic Capacity Information – area/number of dwellin units/proposed floorspace	gs/number of
1,500 sqm aprox	
Market interest - please choose the most appropriate indicate what level of market interest there is/has rec (please select all that apply)	
Site is owned by a developer	У
Site is under option to a developer	
Enquiries received/ strong interest	
Site is currently being marketed	

None	
Not Known	Υ
Comments on market interest	
Utilities - Please tell us which of the following u (please select all that apply)	itilities are available to the site
Mains water supply	Υ
Mains sewerage	Y
Electric supply	Υ
Gas supply	Υ
Public highway	Υ
Landline telephone/broadband internet	Y
Public Transport	Υ
Other (please specify)	

Utilities – comments	
Constraints - Please tell us which of the following cor	straints are applicable to
the site (please select all that apply)	
Land in other ownership must be acquired to enable the s	ite to be developed
Restrictive covenants exist	n
Current land use(s) need to be relocated	n
Physical constraints (topography, trees, other)	n
Flood Risk	У
Infrastructure required	n
Public rights of way cross or adjoin the site	У
Land contamination	n
Access constraints	n
Environmental constraints	У

Please provide any relevant information of likely measures to overcome the above constraints

See attached statement.	
Timescales - Please indicate the appr become available for development (please select one answer)	oximate timescale for when the site will
Immediately	У
Up to 5 years	
5 - 10 years	
10 – 15 years	
Beyond 15 years	
Unknown	

Timescales comments – particularly if you have indicated that the site is not immediately available, please explain why		
n/a		
Other Relevant Information – Please use the space below for additional information		
See attached statement.		
Question 9		
Do you have any site suggestions for Local Green Spaces?		
If you would like to suggest several sites, please submit a separate form for each one.		
Site location (including grid reference and postcode if known)		
Please see attached statement.		

Please provide a site plan clearly identifying the exact boundaries of the site.					
Location - Is the	site in reasonal	bly close pro	ximity to the o	community it	serves?

Local Significance - Is the site demonstrably special to a local community and holds a particular local significance, e.g. due to its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife?

Size / Scale - Is the site local in character and not an exte	nsive tract of land?
Olze / Ocale - 15 the Site local in character and not an exte	iisive tract or land:
If possible, please provide photographs of the site that so	innort vour
	apport your
comments.	

Question 10

Do you have any site suggestions for ecological improvements?

If you would like to suggest several sites, please submit a separate form for each one

Site location (including grid refere	ence and postcode if known)	
n/a – please see attached statement with regard to potential for ecological improvements for the suggested allocation.		
Please provide a site plan clearly	identifying the exact boundaries of the site	
Do you own the site? (please select one answer)		
Yes (full ownership)		
Yes (part ownership)		
No		
	ntrol adjacent land.	

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ing issues,

Question 11 Do you have any site suggestions for renewable energy?

If you would like to suggest several sites, please submit a separate form for each one.

one. Site location (including grid reference and postcode if known) n/a Please provide a site plan clearly identifying the exact boundaries of the site. Please specify the proposed type and scale of energy development (Capacity (MW), Height to tip (m), Height to hub (m)) Do you own the site? (please select one answer) Yes (full ownership) Yes (part ownership) No

How can the site be accessed? Are there any restrictions that may prevent access e.g. third party ownership?	
Please specify known designations (ecological / environmental / historical) or around the proposed site	'n
Current land use (including agricultural land quality rating if relevant)	
Proposed grid connection point (if known)	

Question 12 Do you have any site suggestions for other uses that you think should be included in the Local Plan? What use is the site proposed for? Site location (including grid reference and postcode if known) Please provide a site plan clearly identifying the exact boundaries of the site. Do you own the site? (please select one answer) Yes (full ownership) Yes (part ownership) No

How can the site be accessed? Are there any restrictions that may prevent access e.g. third party ownership?
Please specify known designations (ecological / environmental / historical) on or around the proposed site
Current land use
SignatureEmery Planning
Date03/03/2023
Thank you for completing this response form.



HIGH PEAK LOCAL PLAN EARLY ENGAGEMENT RESPONSE FORM

Responses invited from 19th January 2023 to 5pm on 3rd March 2023

The Local Plan sets out detailed policies and specific proposals for the development and use of land in High Peak (outside of the Peak District National Park). Your feedback will help the Council to identify the issues and options for the Local Plan for consultation later in 2023.

Your Contact Details:

	Personal details	Agent's details (if applicable)
Title		
Name		
Job title (if applicable)		
Organisation (if applicable)	Morten Property Partnership	Emery Planning Partnership
Address	c/o agent	
Post code		
Telephone no.		
Email address		

PLEASE NOTE that responses must be attributable to named individuals or organisations. They will be held by the Council and will be available to view publicly and cannot be treated as confidential. Your contact details will not be published, but your name and organisation (if relevant) will. High Peak Borough Council maintains a database of consultees who wish to be kept informed about the Local Plan. Details of our data protection and Privacy Notice can be found on the council's website at: https://www.highpeak.gov.uk/YourData

Please complete and return this form by **5pm** on **3rd March 2023**

by email to: Idf@highpeak.gov.uk; or

by post to: Planning Policy, High Peak Borough Council, Town Hall, Buxton,

Derbyshire, SK17 6EL

Alternatively, you can respond online on the Local Plan consultation website https://highpeak-consult.objective.co.uk/kse.

Question 1 Do you agree with the Council's initial view of the emerging issues identified from the new evidence? (please select one answer)
Yes
No N
If not, why?
See attached statement.
Question 2 Should the next Local Plan have a new Spatial Vision? (please select one answer)
Yes Y No
If so, what should it say?
See attached statement

Question 3 What should be the Strategic Objectives for the next Local Plan?

See attached statement.
Question 4
Are there any other policies in the Local Plan that you think should be
updated?
(please select one answer)
Yes A
No

See attached statement
Question 5
Are there any other new policies that you think the next Local Plan should include?
(please select one answer)
Yes y
No
Please specify what the new policy should seek to address and why.
See attached statement.

Please specify which policy and how it should be updated.

Question 6

What other evidence should the Council consider to inform the next Local Plan?

See attached statement.			
See attached statement.			
Question 7 & 8 Do you have any site suggestions for housing	ng and / or employment?		
If you would like to suggest several sites, please submit a separate form for each one.			
What is your interest in the site? (please select all that apply)			
Owner of the site	Υ		
Parish / Town Council			
Local resident			
Amenity / Community Group			
Planning Consultant			

Land Agent	
Developer	
Other	
Other (please specify)	
Are you the sole or part owner of the site? (please select one answer)	
Sole Owner	Υ
Part Owner	
Neither	
If you are not the landowner or the site is in multiple ow the name, address and contact details of the land owner provided	
If not the landowner, I confirm that the landowner/s have site submission (please select one answer)	e been informed of this
Yes	

No	
Does the owner(s) support the development of the site? (please select one answer)	
Yes	
No	
Site location (including grid reference and postcode if known)	
Land off Buxton Road, Chapel-en-le-Frith (grid reference: SK06885)	
Site Area (hectares)	
7 hectares approx	
Current Land Use(s) e.g. agriculture, employment, unused/vacant	etc.
Grassland.	
Type of site e.g. greenfield, previously developed land/brownfield	
Greenfield	

Please provide a site plan clearly identifying the exact boundaries of the site.

See attached statement.	
Proposed Future Uses & Potential Site Ca (please select all that apply)	pacity (please specify)
Housing	
Employment	
Mixed-use (please specify uses)	У
Self-build & custom-build housing	
Basic Capacity Information – area/number units/proposed floorspace	r of dwellings/number of
Unknown at present.	
Market interest - please choose the most a indicate what level of market interest there (please select all that apply)	
Site is owned by a developer	
Site is under option to a developer	
Enquiries received/ strong interest	У
Site is currently being marketed	

None	
Not Known	
Comments on market interest	
Enquiries received for commercial storage on part of site.	
Utilities - Please tell us which of the following uti	ilities are available to the site
(please select all that apply)	
Mains water supply	Y
Mains sewerage	Υ
Electric supply	Y
Gas supply	Υ
Public highway	Υ
T done ingilitaly	Y
Landline telephone/broadband internet	<u> </u>
Public Transport	Υ
Other (please specify)	

Utilities – comments	
Constraints Places tell us which of the following constraints	into are applicable to
Constraints - Please tell us which of the following constraints the site (please select all that apply)	mits are applicable to
Land in other ownership must be acquired to enable the site to	o be developed
Restrictive covenants exist	n
Current land use(s) need to be relocated	n
Physical constraints (topography, trees, other)	n
Flood Risk	У
Infrastructure required	n
Public rights of way cross or adjoin the site	У
Land contamination	n
Access constraints	n
Environmental constraints	n

Please provide any relevant information of likely measures to overcome the above constraints

See attached statement.	
Timescales - Please indicate the approx become available for development (please select one answer)	kimate timescale for when the site will
Immediately	
Up to 5 years	
5 - 10 years	У
10 – 15 years	
Beyond 15 years	
Unknown	

n/a	
other Releva	nt Information – Please use the space below for additional
See attached st	atement.
Question 9	
Oo you have	any site suggestions for Local Green Spaces?
f you would lil one.	ke to suggest several sites, please submit a separate form for each
Site location	(including grid reference and postcode if known)
n/a	

Timescales comments – particularly if you have indicated that the site is not

Please provide a	site plan clearl	y identifying	the exact bou	ındaries of th	ne site.
Location - Is the	site in reasonal	bly close pro	ximity to the o	community it	serves?

Local Significance - Is the site demonstrably special to a local community and holds a particular local significance, e.g. due to its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife?

Size / Scale - Is the site local in character and not an exte	nsive tract of land?
Olze / Ocale - 15 the Site local in character and not an exte	iisive tract or land:
If possible, please provide photographs of the site that so	innort vour
	apport your
comments.	

Question 10

Do you have any site suggestions for ecological improvements?

If you would like to suggest several sites, please submit a separate form for each

If you would like to suggest several sites, plone.	ease submit a separate form for each
Site location (including grid reference an	d postcode if known)
n/a	
Please provide a site plan clearly identify	ring the exact boundaries of the site
Do you own the site? (please select one answer)	
Yes (full ownership)	
Yes (part ownership)	
No	
Please specify if you also own/control ac	ljacent land.

ay prevent
until when.
ing issues,

Question 11 Do you have any site suggestions for renewable energy?

If you would like to suggest several sites, please submit a separate form for each one.

one. Site location (including grid reference and postcode if known) n/a Please provide a site plan clearly identifying the exact boundaries of the site. Please specify the proposed type and scale of energy development (Capacity (MW), Height to tip (m), Height to hub (m)) Do you own the site? (please select one answer) Yes (full ownership) Yes (part ownership) No

How can the site be accessed? Are there any restrictions that may prevent access e.g. third party ownership?	
Please specify known designations (ecological / environmental / historical) or around the proposed site	'n
Current land use (including agricultural land quality rating if relevant)	
Proposed grid connection point (if known)	

Question 12 Do you have any site suggestions for other uses that you think should be included in the Local Plan? What use is the site proposed for? Site location (including grid reference and postcode if known) Please provide a site plan clearly identifying the exact boundaries of the site. Do you own the site? (please select one answer) Yes (full ownership) Yes (part ownership) No

How can the site be accessed? Are there any restrictions that may prevent access e.g. third party ownership?
Please specify known designations (ecological / environmental / historical) on or around the proposed site
Current land use
SignatureEmery Planning
Date03/03/2023
Thank you for completing this response form.



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Your Contact Details:

	Personal details	Agent's details (if applicable)
Title		
Name		
Job title (if applicable)		
Organisation (if applicable)	Morten Property Partnership	Emery Planning Partnership
Address	c/o agent	
Post code		
Telephone no.		
Email address		

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Alternatively, you can respond online on the Local Plan consultation website https://highpeak-consult.objective.co.uk/kse.

Question 1 Do you agree with the Council's initial view of the emerging issues identified from the new evidence? (please select one answer)				
Yes				
No N				
If not, why?				
See attached statement.				
Question 2 Should the next Local Plan have a new Spatial Vision? (please select one answer)				
Yes Y No				
If so, what should it say?				
See attached statement				

Question 3 What should be the Strategic Objectives for the next Local Plan?

See attached statement.
Question 4
Are there any other policies in the Local Plan that you think should be
updated? (please select one answer)
Yes A
No

See attac	hed statement
Question	a
	e any other new policies that you think the next Local Plan should
include?	
(please s	select one answer)
Yes [
163	
۸/- ۵	
No	
Disease	
Please s	pecify what the new policy should seek to address and why.
Г	
See attac	ched statement.

Please specify which policy and how it should be updated.

Question 6

What other evidence should the Council consider to inform the next Local Plan?

Consultant distribution of				
See attached statement.				
Question 7 & 8 Do you have any site suggestions for housing and / or employment?				
If you would like to suggest several sites, please submit a separate form for each one.				
What is your interest in the site? (please select all that apply)				
Owner of the site	Y			
Parish / Town Council				
Local resident				
Amenity / Community Group				
Planning Consultant				

Land Agent	
Developer	
Other	
Other (please specify)	
Are you the sole or part owner of the site? (please select one answer)	
Sole Owner	Υ
Part Owner	
Neither	
If you are not the landowner or the site is in multiple ow the name, address and contact details of the land owner provided	
If not the landowner, I confirm that the landowner/s have site submission (please select one answer)	e been informed of this
Yes	

No		
Does the owner(s) support the development of the site? (please select one answer)		
Yes		
No		
Site location (including grid reference and postcode if known)		
Land at Burbage, Buxton (grid reference: SK038723)		
Site Area (hectares)		
1.04		
Current Land Use(s) e.g. agriculture, employment, unused/vacant etc.		
Unmanaged grassland.		
Type of site e.g. greenfield, previously developed land/brownfield		
Part previously developed and part greenfield.		

Please provide a site plan clearly identifying the exact boundaries of the site.

See attached statement.	
Proposed Future Uses & Potential Site Capac (please select all that apply)	city (please specify)
Housing	Υ
Employment	
Mixed-use (please specify uses)	
Self-build & custom-build housing	
Basic Capacity Information – area/number of units/proposed floorspace	dwellings/number of
Approximately 23 dwellings	
Market interest - please choose the most app indicate what level of market interest there is (please select all that apply)	
Site is owned by a developer	
Site is under option to a developer	
Enquiries received/ strong interest	
Site is currently being marketed	

None	
Not Known	Υ
Comments on market interest	
Utilities - Please tell us which of the following u (please select all that apply)	itilities are available to the site
Mains water supply	Υ
Mains sewerage	Y
Electric supply	Υ
Gas supply	Υ
Public highway	Υ
Landline telephone/broadband internet	Y
Public Transport	Υ
Other (please specify)	

Utilities – comments	
Constraints - Please tell us which of the following constraint the site (please select all that apply)	nts are applicable to
Land in other ownership must be acquired to enable the site to	be developed
Restrictive covenants exist	n
Current land use(s) need to be relocated	n
Physical constraints (topography, trees, other)	n
Flood Risk	n
Infrastructure required	n
Public rights of way cross or adjoin the site	n
Land contamination	n
Access constraints	n
Environmental constraints	n

Please provide any relevant information of likely measures to overcome the above constraints				
Timescales - Please indicate the approximate timescale for when the site will become available for development (please select one answer)				
Immediately				
Up to 5 years	У			
5 - 10 years				
10 – 15 years				
Beyond 15 years				
Unknown				

	nts – particularly if you have indicated that the site is not ble, please explain why
Other Relevant Info	rmation – Please use the space below for additional
See attached statement	t.
Question 9	
Oo you have any sit	e suggestions for Local Green Spaces?
f you would like to su one.	uggest several sites, please submit a separate form for each
Site location (includ	ling grid reference and postcode if known)
n/a	

Please provide a site plan clearly identifying the exact boundaries of the site.					
Location - Is the	site in reasonal	bly close pro	ximity to the o	community it	serves?

Local Significance - Is the site demonstrably special to a local community and holds a particular local significance, e.g. due to its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife?

Size / Scale - Is the site local in character and not an exte	nsive tract of land?
Olze / Ocale - 15 the Site local in character and not an exte	iisive tract or land:
If possible, please provide photographs of the site that so	innort vour
	apport your
comments.	

Question 10

Do you have any site suggestions for ecological improvements?

If you would like to suggest several sites, please submit a separate form for each

If you would like to suggest several sites, plone.	ease submit a separate form for each
Site location (including grid reference an	d postcode if known)
n/a	
Please provide a site plan clearly identify	ring the exact boundaries of the site
Do you own the site? (please select one answer)	
Yes (full ownership)	
Yes (part ownership)	
No	
Please specify if you also own/control ac	ljacent land.

ay prevent
until when.
ing issues,

Question 11 Do you have any site suggestions for renewable energy?

If you would like to suggest several sites, please submit a separate form for each one.

one.				
Site location (including grid reference and postcode if known)				
Please provide a site plan clearly identifying the exac	t boundaries of the site.			
Please specify the proposed type and scale of energy development (Capacity (MW), Height to tip (m), Height to hub (m))				
Do you own the site? (please select one answer)				
Yes (full ownership)				
Yes (part ownership)				
No				

How can the site be accessed? Are there any restrictions that may prevent access e.g. third party ownership?	
Please specify known designations (ecological / environmental / historical) or around the proposed site	'n
Current land use (including agricultural land quality rating if relevant)	
Proposed grid connection point (if known)	

Question 12 Do you have any site suggestions for other uses that you think should be included in the Local Plan? What use is the site proposed for? Site location (including grid reference and postcode if known) Please provide a site plan clearly identifying the exact boundaries of the site. Do you own the site? (please select one answer) Yes (full ownership) Yes (part ownership) No

How can the site be accessed? Are there any restrictions that may prevent access e.g. third party ownership?			
Please specify known designations (ecological / environmental / historical) on or around the proposed site			
Current land use			
SignatureEmery Planning			
Date03/03/2023			
Thank you for completing this response form.			





Project: 23-058

Site Address: High Peak Local Plan Representations 2023

Client: J E Morten Ltd and Morten Property Partnership

Date: 03 March 2023

Author:

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EP1. Site plan: Land at Burbage, Buxton

EP2. Site plan: Land at Newfield Garage, Tunstead MiltonEP3. Site Plan: Land at Blackbrook, Chapel-en-le-Frith



1. Introduction

- 1.1 These representations are submitted on behalf of J E Morten Limited and Morten Property Partnership to the High Peak Local Plan Early Engagement Consultation.
- 1.2 J. E. Morten Ltd is a long established and successful company in the High Peak. The original firm was established in 1926 hauling milk from local farms to Manchester and Sheffield. Subsequently the business began manufacturing and distributing liquid animal feeds. The company has operated from the current site in Tunstead Milton since 1978. It remains a family run business.
- 1.3 Following the publication of the Clean Air Act 1993, the business started to expand into the production of Adbue. Adbue also known as diesel exhaust fluid, is a pollution control product which reduces nitrogen oxide to nitrogen and oxygen which are not pollutants. Nitrogen oxide is one of the most damaging air pollutants (source: Clean Air Strategy 2019). Adbue is best known for its used in diesel vehicles and combustion systems. However, J.E. Morten Ltd estimates that this account for the majority of their Adblue trade. It is also used for:
 - the generation of electricity, both on and off grid, particularly where recycled products are used as the prime energy source for example, waste timber, refuse derived fuel and methane derived from anaerobic digestion.
 - glass house horticulture where electricity is generated in combined heat and power systems and the carbon dioxide is used for photosynthesis. This natural process is where the CO2 generated by the combustion of fossil fuel is absorbed by the growing plants.
 - Reduction of emissions in shipping, railroad transport, heat and power schemes, farm machinery, quarry equipment and construction equipment. Whilst battery power has the potential to produce motive power, currently it is only practical in light vehicles.
 - Other industrial processes where combustion is part of the process.
- 1.4 J E Morten now operates one of the largest Adbue manufacturing sites in the UK distributing nationwide. Having manufacturing urea solutions for over 15 years has a wealth of resources and equipment in this field. At a local level the company supplies approximately 170 local commercial customers (a list can be provided on a confidential basis) in conjunction with many private customers. J E Morten supplies Adblue to most of the local quarries and the local mineral hauliers in the area. It also supplies the emergency services, police, ambulance and fire service. The company has a need to expand and a number of locational considerations, the most important being the need for a high quality water supply, mean it is essential for the business to remain in its current location.

- 1.5 J E Morten Limited and family have a number of land interests in the borough. These representations focus on the delivery of housing and employment and the future of business within the borough. Specific representations are made in relation to the following sites:
 - Land at Burbage, Buxton residential development
 - Land adjacent to Newfield Garage, Tunstead Milton employment development and expansion of the existing primary employment zone
 - Land at Blackbrook, Chapel-en-le-Frith employment development

2. Response to policies

Question 1: Do you agree with the Council's initial view of the emerging issues from the new evidence? If not, why?

2.1 We set out our initial views in relation to housing and employment issues below.

Housing

- 2.2 The Early Engagement document confirms that the Local Housing Need for High Peak, calculated using the Government's standard method, is currently 260dpa. This figure is significantly lower than the requirement set out in the current Local Plan of 350dpa.
- 2.3 Paragraph 61 of the National Planning Policy Framework (the Framework) states:

To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – <u>unless exceptional circumstances justify an alternative approach</u> which also reflects current and future demographic trends and market signals. (Our emphasis)

2.4 Paragraph 2a-010 of the PPG explains that the standard method is only the starting point and there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates. The PPG states:

The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

• growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);



- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or
- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;

There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities are encouraged to make as much use as possible of previously developed or brownfield land, and therefore cities and urban centres, not only those subject to the cities and urban centres uplift may strive to plan for more home. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.

2.5 The examples given in the PPG for when local housing need could be exceeded are not exhaustive. The PPG also recognises at paragraph 2a-010 that the standard method does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. If the amount of housing growth is not sufficient to align with jobs growth, this will serve to constrain economic growth and place significant strain on the housing market due to the additional demand. It would also worsen affordability further if the jobs growth is not matched with sufficient housing growth. This was recognised in the Doncaster Local Plan, where LHN equated to 553 dpa but the plan requirement is 920 dpa. The Inspector's report states at paragraph 56:

"The significant uplift is intended to allow additional people to live in the Borough to ensure a sufficient working population to take account of the number of additional jobs that the Plan aims to accommodate."

2.6 Similarly, a higher figure than LHN has recently been adopted in the St Helens Local Plan. The Inspector's report states at paragraph 54:

"The PPG also makes it clear that other circumstances might also justify a higher figure. In the case of St Helens, the 486 dpa is justified to correlate with the aspirations to achieve increased economic growth and jobs which are likely to lead to increased housing need and demand."

- 2.7 Furthermore, chapter 6 of the Framework relates to building a strong competitive economy. Paragraph 81 of the Framework states planning policies and decision should help to create conditions in which businesses can invest expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business and the wider opportunities for development. Paragraph 82(c) of the Framework continues to state planning policies should:
 - c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment;



- 2.8 Therefore, to understand whether an alternative approach to the standard method is justified, it is critical that an appropriate level of jobs growth is identified. Only then can it be considered how many homes are required to support that growth.
- 2.9 The consultation document refers to the High Peak Housing and Economic Land Needs Assessment (September 2022) (HELNA) which considers the overall housing need, the need for different types of housing and employment land requirements up to 2041.
- 2.10 The HELNA acknowledges that the figure of 260dpa is only the starting the point. Paragraph 9.14 of the HELNA reflects the guidance provided within the PPG and states it is the intention of the government that the local housing need figure is minimum figure which does not attempt to predict future growth, the impact of changing Government policies, changing economic circumstances or other demographic behaviours.
- 2.11 The HELNA states the LHN figure of 260dpa is an appropriate figure moving forward if considering the baseline economic growth forecasts. However, this is not the case if a policy on approach is taken, i.e., if the level of housing growth is to align with the planned level of economic growth. Paragraph 14.18 of the HELNA states:
 - If, however, HPBC decides to pursue a higher level of economic growth and allocates sufficient employment land to support this, in line with the Policy On Scenario for example, then it should also consider increasing the housing target accordingly. The standard methodology is appropriate for PDNPA in so far as it can be used, with other methodologies, to determine need arising within the National Park.
- 2.12 In this scenario a higher housing requirement of 336dpa is suggested as appropriate. To put this figure into perspective in the context of the national policy imperative to 'significantly boost' the supply of housing, 336dpa is still lower than the current housing requirement set out in the adopted Local Plan (350dpa).

Affordable housing

2.13 Paragraph 2a-024 of the PPG states:

"The total need for affordable housing will need to be converted into annual flows by calculating the total net need (subtract total available stock from total gross need) and converting total net need into an annual flow based on the plan period.

The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. An increase in the total housing figures included in

the plan may need to be considered where it could help deliver the required number of affordable homes." (our emphasis)

2.14 Paragraph 67-001 also states:

"Strategic policy-making authorities will need to consider the extent to which the identified needs of specific groups can be addressed in the area, taking into account:

- the overall level of need identified using the standard method (and whether the evidence suggests that a higher level of need ought to be considered);
- the extent to which the overall housing need can be translated into a housing requirement figure for the plan period; and
- the anticipated deliverability of different forms of provision, having regard to viability."
- 2.15 Therefore, the PPG is clear that an increase in the housing requirement can be considered if it is necessary to help address the identified level of affordable housing need. Such consideration ought to be given in High Peak given the scale of affordable housing need, which is very significant.
- 2.16 The HELNA confirms that the affordable housing need for the borough cannot be met by the standard method. Paragraph 14.26 states:

Total affordable needs are in the range between 228 and 270 affordable homes per annum 2021 to 2041. This is a significant proportion of the locally assessed need based on the standard method (260 dpa) of between 88% and 104%. (Our emphasis)

- 2.17 Turning to past delivery of affordable housing, there have been only 432 affordable homes completed during the period 2016/17 to 2021/22. This equates to 20% of the total housing completions over this period.
- 2.18 Therefore, there is no realistic prospect of meeting the identified need for affordable by simply adopting the minimum local housing need as the housing requirement. A substantial and serious shortfall will remain.
- 2.19 Providing a higher housing requirement, and a complementary supply of viable sites, would assist in the delivery of much needed affordable housing and addressing the identified need for affordable housing in the borough and this should be carefully considered by the council as they progress the Local Plan Review. Whilst there is little question that the shortfall cannot be met in full, there is clear justification for considering an increase to the overall housing requirement, in accordance with paragraph 2a-024 of the PPG.



Past delivery

- 2.20 The Early Consultation document at Table 1 provides a summary of housing completions in the borough from 2011-2022. The table demonstrates the variability in housing completions over this period. It can be noted that:
 - Following the adoption of the Local Plan in 2016, there was a clear trend of increased completions which is indicative of increasing market demand and a market which could support a housing requirement above that suggested by the standard method.
 - For the period 2016/17 to 2021/22 (i.e., the period following the adoption of the Local Plan), total completions amount to 2,149 (358dpa). This figure is in excess of local housing need as determined by the standard method (260dpa) and the adopted housing requirement (350dpa).
 - There was a marked decrease in delivery in 2020/21, however this was during the peak of the Covid-19 pandemic which may account for this figure. If the year 2020/21 is removed from the completion data for the last 6 years to account for COVID-19, the average for the period 2016/17 to 2021/22 increases to 380dpa.
- 2.21 We consider that the biggest constraint to the achievement of the housing requirement since the start of the plan period for the current Local Plan (2011) has been a lack of genuinely available, viable and deliverable sites. The sites that primarily delivered from 2016 onwards were those which came forward ahead of the plan, including those sites which were consented on appeal in the absence of an up-to-date plan. However, a number of the allocations in the current adopted plan have proven to have had trajectories that were over-optimistic within the context of the constraints present. The extent of windfall development anticipated in the Local Plans has also proven to be over-optimistic, and Policy H1 of the Local Plan has delivered very little in terms of windfall sites beyond the existing settlement boundaries. Furthermore, several sites have been subject to extremely lengthy planning application processes, with planning applications often taking more than 12 months before determination (and sometimes considerably longer).
- 2.22 Therefore, past delivery should not be used as a reason to constrain the housing requirement moving forward. The focus should be on significantly boosting housing supply and delivery. In practice, this means pursuing a requirement which at least maintains levels of recent delivery (i.e., at least 350dpa) and aligns with the planned level of economic growth (i.e., at least 336dpa).

Housing land supply

2.23 In the consideration of the implications of the HELNA, the consultation document states the council may need to consider supply of housing land as part of the Local Plan process to ensure that there is sufficient

- suitable and available land to meet whatever the new housing requirement is in the new Local Plan over the plan period to 2041.
- 2.24 As with past delivery, the housing requirement should not be constrained by the existing housing land supply. If additional land is required, then the Local Plan should allocate sufficient sites to meet the identified needs. We set out below additional sites that we consider are suitable for allocation through this process, which could contribute to meeting the future housing requirement in a sustainable way.

Housing requirement: summary and conclusions

- 2.25 The circumstances in High Peak provide clear justification for the application of an alternative method to determine local housing need, in accordance with the Framework and paragraph 2a-010 the NPPG. These are as follows:
 - The housing requirement in the adopted Local Plan (350dpa) is significantly higher than the minimum housing need figure produced by the standard method (260dpa).
 - Significantly higher completion figures than the minimum housing need figure produced by the standard method have been achieved in the recent past, with completions since 2016 averaging 358dpa.
 - The housing need associated with planned employment growth is likely to significantly exceed that set out in the standard method. The HELNA states that to align the housing requirement with the planned level of employment growth, the housing requirement would need to be 336dpa.
- 2.26 In addition, paragraph 2a-024 of the PPG states that an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes. The affordable housing needs of High Peak cannot be met by the standard method, as acknowledged in the HELNA. Increasing the housing requirement would therefore help to deliver much needed affordable housing and would be entirely consistent with national guidance.
- 2.27 We therefore consider that the housing requirement should be a minimum of 350dpa. This figure would:
 - Align with housing requirement in the adopted Local Plan, and would be reflective of completion levels achieved since the current Local Plan was adopted in 2016. Anything less than 350dpa would not represent a 'significant boost' to housing supply.
 - Align the housing requirement with the planned level of economic growth.
 - Ensure that the delivery of affordable housing does not collapse, in the context of the supply of affordable housing at present failing to meet affordable housing needs by some margin.



Any decrease in the supply of affordable housing would represent a significant adverse impact.

2.28 In relation to affordable housing need, we consider that the scale of need remains so significant, that an increase in the requirement in excess of 350dpa should be considered. The Council should test options for up to 500dpa to understand what extent of the need can be met, and the availability of suitable sites to meet that need.

Employment

- 2.29 In respect of employment, section 2 of the Early Engagement document states that Policy S4 regarding employment needs was found to be out of date due to new evidence. It states that around 30 hectares of land has been identified as being needed to support the economy in High Peak up to the year 2041. This is lower than the current Local Plan need figure of 45 hectares.
- 2.30 This statement conflicts with the summary of the key findings of the High Peak Housing and Economic Land Needs Assessment (2022) set out on page 15 of the Early Engagement document which are copied below and accepts that the need could be as high as 54 ha:
 - There is little to no need for additional office floorspace.
 - There continues to be a demand in Buxton and Glossop for industrial units small industrial estates serve a stable market.
 - The Borough has a relative scarcity of smaller Industrial sites between 2,000 and 3,000 sq. ft. per unit and that these are the units most in demand.
 - Based on an assessment of a variety of demographic and economic scenarios, the likely overall need for employment land is within the range of 25-34ha. However, based on past trends, the need could be as high as 54ha.

(our emphasis)

- 2.31 We have reviewed the Housing and Economic Land Needs Assessment (HELNA). This assesses the future employment space requirements on the basis of 8 scenarios.
- 2.32 The report indicates that based on monitoring data provided by the council that over the 14 year period from 2007/8 to 2020/21, the gross completions for B-Class uses in High Peak amounted to 1.98 ha per annum. Losses per annum have averaged 0.56ha over the same period resulting in a net gain of 1.42 ha per annum. If past trends were replicated in the future, trending forward an annual requirement of 1.42 could justify the provision of 28.42ha (net) over the next 20 years in High Peak. Paragraph 7.70 considers that the 1.42ha long term annual past take up rate represents a realistic figure going forward over the remainder of the plan period.



2.33 The final gross figures for each of the scenarios are shown in table 7.20 below. This includes a reasonable allowance to provide for some flexibility for provision of losses but avoids over provision of land.

Table 7.20 High Peak Gross Employment Land Comparisons 2021-2041

		Offices / R&D (ha)	Light Industrial (ha)	General Industrial (ha)	Warehousing (ha)	Total (ha)
1) Experian December 2021 Baseline	Net	0.84	0.93	-3.84	8.17	6.10
	+ Flexibility Factor	0.88	0.93	-1.39	8.64	9.06
	+ Loss Replacement	2.56	3.74	12.73	12.51	31.54
2) Experian pre-Covid March 2020 Baseline	Net	0.20	-0.74	-6.43	6.64	-0.32
	+ Flexibility Factor	0.24	-0.74	-3.98	7.11	2.64
	+ Loss Replacement	1.92	2.06	10.15	10.99	25.11
3) CE / Experian Midpoint	Net	0.66	0.64	-4.04	7.58	4.84
	+ Flexibility Factor	0.70	0.64	-1.58	8.04	7.79
	+ Loss Replacement	2.37	3.44	12.54	11.92	30.27
4) Policy On	Net	1.08	1.11	-2.30	8.17	8.06
	+ Flexibility Factor	1.13	1.11	0.15	8.64	11.02
	+ Loss Replacement	2.80	3.91	14.27	12.51	33.50
5) <u>Labour</u> Force under SM2 (260 dpa)	Net	0.84	0.93	-3.84	8.18	6.11
	+ Flexibility Factor	0.88	0.93	-1.39	8.64	9.07
	+ Loss Replacement	2.56	3.74	12.73	12.52	31.55
6) 2014-based SNPP MYE	Net	-0.10	-0.37	-4.98	4.67	-0.78
	+ Flexibility Factor	-0.06	-0.37	-2.53	5.14	2.18
	+ Loss Replacement	1.61	2.44	11.59	9.01	24.66
7) 2018-based SNPP MYE	Net	0.89	1.02	-3.78	8.35	6.48
	+ Flexibility Factor	0.94	1.02	-1.33	8.82	9.44
	+ Loss Replacement	2.61	3.82	12.79	12.69	31.92
8) Past Take Up	Net	0.43	-1.12	24.51	4.65	28.48
	+ Flexibility Factor	0.48	-1.12	26.96	5.11	31.44
	+ Loss Replacement	2.15	1.69	41.08	8.99	53.91

2.34 The scenarios range from a low of 24.66ha (scenario 6 2014-based SNPP) to the past take up figure of 54.91ha (scenario 8). The other 6 scenarios cluster between 25-34 ha. The report states at paragraph 7.91 that:

These are lower than the findings of the 2014 ELR Demand Update, which identified a need for between 40 ha and 80 ha, which no doubt reflects the lower level of growth in recent years and the influence of the pandemic and Brexit.

2.35 The HELNA goes onto state at paragraph 14.12 that:

The selection of the final employment land requirements will depend upon the preferred level of employment growth for the Borough and the extent to which this aligns with the Council's economic aspirations and housing targets, including the need to reduce net out commuting.

2.36 The report concludes that:



The demand side assessment indicates that High Peak Borough requires between 25 ha and 54 ha of employment land over the 20-year plan period to 2041. Accepting that the SHELAA has a slightly earlier base period (2020 rather than 2021), the forward supply of 59.4 ha would, theoretically, appear to be of a sufficient scale to meet even the upper end of the range, although there is of course no guarantee that all the identified source of supply would necessarily come forward for that use.

- 2.37 We consider that scenario 8 reflects a realistic scenario based on take up rates over a period with a lower level of growth. This should be the minimum economic target in order to proactively encourage sustainable economic growth and regeneration and reduce out-commuting.
- 2.38 We consider that Scenario 8 is the minimum level of employment land allocated that should be selected and this is supported by the identified source of supply to date. Further flexibility should be incorporated into the new plan to accommodate employment needs that are not currently anticipated. As such we consider that the proposed employment figure should be at least 54 hectares.
- 2.39 Table 7.22 shows the split of the gross employment land requirements by Sub-Region and is copied below. It is noted at paragraph 7.104 that given the statutory duty of the National Park, and that is has seen very little employment land development in recent years it would be unreasonable for the PDNPA to pursue a target towards the upper end of the range and that a lower growth figure for this area of between 3.4 ha and 4.5 ha is likely to represent a closer fit.

Table 7.22 Gross Employment Land Requirements by Sub-Region in High Peak 2021-2041

	High Peak Borough	Glossop	Central Area	Buxton	National Park
1) Experian December 2021	31.54	8.96	10.21	8.11	4.26
2) Experian pre-Covid March 2020	25.11	7.03	8.15	6.52	3.41
3) CE / Experian Midpoint	30.27	8.57	9.87	7.74	4.10
4) Policy On	33.50	9.45	11.02	8.47	4.54
5) SM2 260 dpa	31.55	8.97	10.21	8.11	4.26
6) 2014-based SNPP MYE	24.66	6.86	8.33	6.11	3.36
7) 2018-based SNPP	31.92	9.08	10.31	8.22	4.31
8) Past Take Up Rates	53.91	13.51	21.75	10.93	7.73

Source: BRES 2020 / Lichfields Analysis

2.40 In terms of forward supply, the HELNA states that the SHELAA shows that there are a total of 21 potential sites extending to 59.4 ha that make up the forward supply. This comprises 15 previously developed sites totaling 33.2ha and 6 greenfield sites totaling 26.2 ha. Table 7.24 of the HELNA shows the theoretical capacity of the sites.

- 2.41 Paragraph 7.1114 of the HELNA states that it is relevant to note that in terms of the distribution of the supply, none of it is located in the National Park Area but that there is an imbalance with where the sites are located.
- 2.42 Within the Central Area there are 12 sites (12.6 hectares) identified within the future supply. This equates to 21.2% of the forward supply and is inconsistent with the identified need for the Central Area which has around 32%-40% of the need. We consider that there is a need to identify additional sites in the central area to readdress this imbalance and our client's land is suitable in this regard.

Question 2: Should the next Local Plan have a new Spatial Vision? If so, what should it say?

2.43 Yes, to be determined once all background evidence to hand.

Question 3: What should be the Strategic Objectives for the next Local Plan?

2.44 In terms of employment, the next Local Plan should set out a clear economic vision and strategy for the area which proactively encourages sustainable economic growth and regeneration and seeks to reduce out-commuting. This should include flexibility for employment needs that are not currently anticipated and that the future supply is provided in each of the sub-areas.

Question 4: Are there any other policies in the Local Plan that you think should be updated? Please specify which policy and how it should be updated.

2.45 Policy E3: Primary Employment Zones should be updated to reflect the grant of planning permissions during the plan period and the lawful use on the site. In particular, the Primary Employment Zone at Tunstead Milton should be amended to include the 0.18 ha parcel of land immediately to the west of the existing primary employment zone as shown in the plan attached at Appendix EP2. This land has an established lawful use and this update would simply represent the circumstances on the ground.

Question 5: Are there any new policies that you think the next Local Plan should include? Please specify what the policy should seek to address and why.

2.46 This is not applicable to these representations.

Question 6: What other evidence should the Council consider to inform the next Local Plan?

2.47 Section 3 of the early engagement document, pages 21 to 30 list various reports that are ongoing or will be undertaken in order to inform the next Local Plan. These reports should be finalised prior to the next stage of engagement and made publicly available.

Question 7: Do you have any site suggestions for housing?

Land at Burbage, Buxton

2.48 The site extends to 1.04 hectares and is situated in open countryside but adjacent to the settlement boundary of Buxton. It is located in Burbage and is approximately 2km west of Buxton Town Centre. Bus stops are located on Level Lane providing links to the town centre. The site is bound to the north and east by existing residential development within the settlement boundary. To the south and west is open countryside. The surrounding land is actively farmed and very different in character to the application site. A public footpath runs away from the site through this land in a south westerly direction. A site plan is enclosed at Appendix **EP1** and an extract identifying the land is shown below:



2.49 As one of the Market Towns in the Borough, Buxton is a main focus for housing, employment and service growth as set out in Policy S2 and it will inevitably continue to be a main focus for growth in the next Local Plan and additional housing growth will be required.

- 2.50 The site contains an existing dwelling and its associated curtilage, as well as an area of open land that is not currently in any active agricultural use and has an unmanaged appearance. There are established mature trees and planting along the northern boundary of the site and a stream which becomes the River Wye, runs through and along the northern boundary of the site. The presence of the existing dwelling and access road mean the site is partly brownfield land. The land slopes down from the site access on Level Lane and has an undulating form, levelling out towards the southern boundary where the site abuts the boundary of the recently constructed residential development, which is accessed of Macclesfield Main Road. The access to the site would be taken from Level Lane which leads from Macclesfield Old Road. The Highways Authority has confirmed through initial pre-application discussions that there would be no objection in principle to the development of this site.
- 2.51 When viewed from the wider surrounding area from the south and east; the site sits below and is framed by the existing houses on Level Lane Annecroft, Brookside Drive, and Carr Road. It is anticipated that the site could accommodate in the order of 23 homes. The area to the north of the watercourse would be utilised as amenity land.
- 2.52 By virtue of the existing dwelling, associated curtilage and unmanaged nature of the land, it has a different appearance to the adjacent open agricultural land to the south and west. The land is also more undulating than the surrounding land suggesting that ground levels have been artificially altered in the past.
- 2.53 The most open views of the site are from the west and the south along both the Macclesfield Main Road area and briefly from certain points on the A537. From this direction the land has a differing appearance to the wider surrounding agricultural land and is seen in the context of existing dwellings to Level Lane, Annecroft, Brookside Drive and Carr Road. The site lies at a lower level to almost all of the existing residential development surrounding the site and in that context we consider this could be viewed as an infill or "rounding off" of the existing built development boundary.
- 2.54 The site was considered by the Local Plan Inspector as part of the examination of the 2016 Local Plan. The Inspector stated at paragraph 265 of his report that:

The second area of land being promoted in B17 is to the north of and adjoining the first site and is referred to as *Land at Burbage*, *Buxton*. It contains a dwelling, access road and an area of rough grass. There is a stream on its northern boundary and it is adjacent to new residential development on the urban edge. The unmanaged and more undulating appearance of much of the site gives it a different character to the first area of land. However, it is still visually part of the wider B17 land. Some development here would be visible from Macclesfield Main Road. Notwithstanding the adjacent buildings it has not been demonstrated that the development of this site in isolation could be accommodated without harm to the wider landscape considerations at site B17.

- 2.55 The Wardell Armstrong Landscape Impact Assessment report update (August 2014) which formed part of the evidence base for the 2016 Local Plan identified this site as unsuitable for development in landscape terms. However, the Assessment itself noted that this was a high level study and there would be variations in the level of landscape impacts which could be determined by further detailed surveys at field level.
- 2.56 It is of relevance that other sites allocated in the 2016 Local Plan were subject to landscape constraints. For example Foxlow Farm (Policy DS20) which is allocated for 440 dwellings is assessed within the January 2014 Landscape Appraisal:

"Site has significant landscape impacts and detailed and extensive landscape masterplanning as set out above would be required to address the issues of visibility and impact on the National Park and character of the surrounding area."

2.57 The LIA goes on to state at paragraph 8.4.4 that:

"Development on Harpur Hill is very constrained due to the high elevation, visual prominence and potential impact on the setting of the National Park. Because of these constraints no further areas of land with the potential to accommodate development were identified and the Foxlow Farm sites were determine to be unsuitable for development in landscape terms without the formulation of detailed mitigation measures to address the landscape issues raised would be required. "

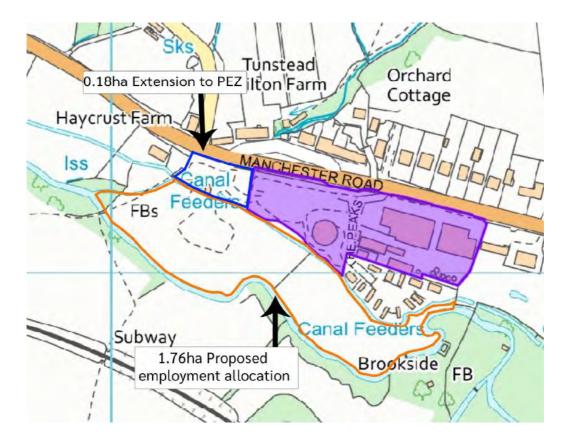
- 2.58 The Foxlow Farm site had also previously been discounted from earlier iterations of the Local Plan based on landscape impact. The conclusions of the 2014 landscape assessment and the previous Inspector's comments do not preclude a future allocation.
- 2.59 The applicant would be happy to provide a landscape masterplan to demonstrate that the development of the site would not extend further into any more open areas than the existing development surrounding and when combined with the current uses and appearance its development would not be out of character with the surrounding area and would not have any adverse impact on the visual appearance of the area.
- 2.60 Any proposed development for the site would seek to retain the existing trees and planting along the northern edge of the site, with any removal or works being the minimum necessary. Detailed assessments of aboricultural and ecology matters would be required and would take account of the watercourse, as a potential habitat. Whilst the site beyond the dwelling and curtilage is currently unmanaged, its appearance suggests previous management or agricultural use of this area which would mitigate against any significant biodiversity interests on the site. The initial ecology assessments indicate no significant constraints on the site and it is considered there would be no significant impact on interests in the wider area.
- 2.61 The site is deliverable within a 5 year period

Question 8: Do you have any site suggestions for employment?

2.62 Yes.

Land at Newfield Garage, Tunstead Milton

- 2.63 The site is located to the south of the B5470 Manchester Road on the edge of Tunstead Milton, which is an established settlement located between the principal market towns of Chapel-en-le-Frith and Whaley Bridge. The built-up area of Tunstead Milton, which is predominantly residential in character, fronts onto Manchester Road in a linear fashion.
- 2.64 The site is located in the open countryside. Part of the land has a historic use as part of the wider J E Morten Limited operations and indistinguishable in character from the part of the site within the PEZ.
- 2.65 This part of the site is proposed for inclusion in the PEZ.
- 2.66 The remainder of the site comprises a field located in the valley and screened from the wider area by mature tree planting. It is situated between the canal feeder linked to Combs Reservoir which runs along the northern boundary of the site and the Randal Carr Brook to the south. It forms part of a much wider area of Local Green Space designated in the Chapel-en-le-Frith Neighbourhood Plan (addressed under question 9 below). Commercial storage takes place on part of the land and this is subject to a pending application for a certificate of lawful existing use seeking confirmation that the lawful use of the land is for commercial storage (HPK/2022/0568).
- 2.67 Immediately to the north, the site adjoins the Primary Employment Zone within Tunstead Milton with the settlement of Tunstead Milton beyond. To the south and east are open fields. The extract below taken from the plan appended at EP1 shows the relationship of the site to the Primary Employment Zone.



2.68 The site proposed for allocation is situated to the north of the stream. The stream forms a natural boundary and would separate the commercial use from the countryside beyond. As set out above, part of the site is affected by flooding and there are other environmental matters to be addressed. As such it is anticipated that only the northern part of the site adjacent to the existing commercial uses would be suitable for development. This would provide a logical extension to the existing commercial use and could be done so as to be sensitive to the surrounding countryside.

Relevant planning history

- 2.69 The wider commercial garage site has an extensive planning history. Applications relating specifically to this site or part of it are summarised below:
 - HPK/2019/0223: single storey industrial building refused 15 August 2022
 - HPK/2007/0628: Development of land for leisure purposes and erection of 16 timber holiday chalets – refused 17 October 2007
 - HPK/2022/0568: application for certificate of lawfulness for commercial storage undetermined

- 2.70 Planning permission HPK/2019/0223 was refused for three reasons. The first reason related to the location of the site within the Local Green Space. We set out in relation to question 9 why this designation should be reappraised and not included in the Local Plan.
- 2.71 The second reason for refusal related to insufficient information in relation to the impacts of the scheme on the Peak District National Park. This was a late objection and the applicant was not afforded the opportunity to address this concern at the time. It is considered that this reason for refusal could be addressed.
- 2.72 Finally, the application was refused on the grounds of insufficient parking provision. This consideration was specific to the proposal and could be overcome. There were no objections from Derbyshire County Council in relation to highways matters.
- 2.73 There were no objections from AES Waste, Canal and River Trust, County Authority Highways, County Flood Authority, County Trees Officer, Derbyshire Wildlife Trust, Environment Agency, Environmental Health or the Council's Regeneration Officer.

Site specific considerations

Biodiversity

2.74 An Ecology Survey was prepared by Penny Anderson Associates as part of the earlier application which concludes that the proposed building would be constructed on areas of improved grassland and ephemeral/short perennial habitat, both of which are considered to be common and widespread habitats of low conservation value. No evidence of protected species was found on site at all, and this area is located away from the watercourses and the tree T7 which had the most potential to be used by animals frequenting the site. There is an opportunity to incorporate wetland habitat into any proposal which would enhance biodiversity.

Landscape

2.75 The site is situated within a bowl in the valley surrounded by dense tree planting screening the site from the surrounding area. There is potential for a landscaping scheme to incorporate both landscape and biodiversity enhancements, in particular, a substantial wetland scrape which could be planted with plugs of native aquatic plants, linked to a new ditch and associated native hedge. It is anticipated that proposed tree planting would augment the pattern of tree cover and hedgerows in the valley floor and help to screen the proposed development from view at lower levels. Over time this effect would extend to soften views from higher levels as well. Large stock trees would be included to make the softening impact of tree planting more immediate.

Land at Blackbrook, Chapel-en-le-Frith

2.76 This site extends to approximately 7 hectares of greenfield land location off Buxton Road, Chapel-en-le-Frith. It is currently designated as open countryside adjacent to the settlement boundary of Chapel-en-le-Frith. It is located approximately 700m from Chapel-en-le-Frith town centre. The site is bounded by residential to the north. To the east it adjoins Buxton Road and to the west, Ashbourne Lane. A site plan showing the extent of our client's ownership is enclosed at Appendix EP1 and it is shown on the extract below. It is not presumed that the entirety of the site would be developed.



- 2.77 The site comprises agricultural land. It is however, well related to the existing settlement and road infrastructure. Access could be achieved off Buxton Road.
- 2.78 The Landscape Impact Assessment undertaken by Wardell Armstrong in 2014 notes in respect of Chapelen-le-Frith that:

All land to the east, south and west is elevated and visually prominent. Any development would have a high visual impact and affect the setting of the National Park. The A6 acts as a strong settlement boundary to the north and east of the settlement and development should not breach this well defined boundary.

2.79 Although the site is in an area identified as not being able to accommodate development, it is to the west of the A6 and would not breach the well defined boundary referred to by Wardell Armstrong in the quote above. It is not at a high level and is screened by the natural topography on the approach to Chapel-en-le-Frith from the south.

2.80 Our client has received enquiries for commercial storage on the land. Representations were made to the SHELAA in 2018 to promote the site for a mixed commercial and residential scheme. It is considered that the site is appropriate for a commercial led mixed-use development.

Question 9: Do you have any site suggestions for Local Green Spaces?

- 2.81 We consider that the Local Green Space (LGS) designation at Tunstead Milton should not be included in the Local Plan.
- 2.82 As set out above, at present the site is identified as an area of Local Green Space in the Chapel-en-le-Frith Neighbourhood Plan which was made on 15th August 2015. It is one of 14 areas of Local Green Space identified in the Chapel-en-le-Frith Neighbourhood Plan (CNP).
- 2.83 Whilst the Local Plan, which was adopted after the CNP in 2016, did designate areas of Local Green Space, this site is not one of them.
- 2.84 The Chapel-en-le-Frith Parish Council (CPC) website contains the background evidence documents on the countryside section of the CNP. The CPC Countryside Evidence documentation explains the process for the designation of LGS across the Parish area as follows:
 - Chapel Vision Survey 2012 forms were sent to interested parties within the Parish. Any countryside area of the Parish named more than once by interested parties for special protection was the subject of an assessment by local volunteers as to whether that area comprised LGS in accordance with the criteria for LGS provided within the NPPF.
 - Public consultation events were subsequently carried out for the Consultation Version of the Neighbourhood Plan with interested parties able to make general comments. At these events, interested parties were able to place stickers on countryside areas of the Parish that should be protected through the emerging neighbourhood plan.
 - Public consultation carried out for the Examination Version of the Neighbourhood Plan with interested parties able to make general comments.
- 2.85 At no point through the published Countryside Evidence documentation does the CPC state that any consultation on LGS was carried out within the relevant landowners. This is a requirement of the PPG (paragraph 37-019) and it is a particularly important stage of the process of designating any LGS given the implications of this designation and the fact that the management of LGS will remain the responsibility of the landowner. Paragraph 37-019 of the PPG states the following:

"A Local Green Space does not need to be in public ownership. However, the local planning authority (in the case of local plan making) or the qualifying body (in the case of neighbourhood plan making) should contact landowners at an early stage about

proposals to designate any part of their land as Local Green Space. Landowners will have opportunities to make representations in respect of proposals in a draft plan."

- 2.86 We understand that our client was nor formally consulted on the CNP and as such did not make representations to the emerging Local Plan. Had our client been notified of the intentions to designate part of his land as LGS then he would have made representatations. Therefore our client was deprived of a proper opportunity to object and his views were not taken into account through the formulation of the Examination Version of the CNP.
- 2.87 The site forms part of the wider area of Local Green Space 11 described as 'field behind Morten's Yard,
 Tunstead Milton between Randall Carr Brook and canal feeder.
- 2.88 The open space designation is shown on the extract from Figure 6 of the Neighbourhood Plan below:



- 2.89 Paragraph 102 of the Framework states that the Local Green Space designation should only be used where the green space is:
 - In reasonably close proximity to the community it serves
 - Demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquility or richness of its wildlife; and
 - Local in character and is not an extensive tract of land.
- 2.90 The reasons for designating this LGS were:

"Tranquil; wildlife; long distance footpath"



2.91 In terms of <u>wildlife</u>, an ecology survey was undertaken by Penny Anderson Associates in relation to an earlier planning application on the site. This concludes that:

"No SAC, SSSI or Biodiversity 2020 priority habitats were present on site. No Local Wildlife Sites were located on or adjacent to site. Kingfisher, common toad, brown hare and badger have been recorded within the search area, but none from the site itself; similarly for Derbyshire Red Data Book plants.

All the habitats and the plant species present are common and widespread, typical of the locality, on sites which have been significantly improve or agriculture and/or disturbed by human activities. No habitats present meet local wildlife site selection criteria.

Bat roost potential on the site was low, with only one tree, T7, exhibiting any bat roost potential (Moderate). This tree can be retained under the proposals.

No evidence of otter or water vole was found and the site is considered to have low suitability for both species, although otter could use watercourses on site, especially Randall Carr Brook, for commuting and foraging."

- 2.92 Having regard to the <u>long distance footpath</u>, whilst there is a footpath running along the north west boundary of the designation, there is no public footpath or right of access to the site. The site is within private ownership and it is grazed for agricultural purposes. There is no authorised or discretionary access for members of the community or the wider public. The site as it presently exists makes no contribution whatsoever to opportunities for walking and recreation.
- 2.93 Finally, with regard to <u>tranquillity</u>, the site adjoins an area allocated as a Predominantly Employment Zone and is influenced by the activities that take place on site.
- 2.94 In summary, the site makes a very limited contribution or no contribution at all to the three stated main purposes of designating the site as part of the wider LGS. It is requested that the LGS designation is reappraised and not included in the Local Plan.

Question 10: Do you have any site suggestions for ecological improvements?

2.95 This is not applicable to these representations.

Question 11: Do you have any site suggestions for renewable energy?

2.96 This is not applicable to these representations.

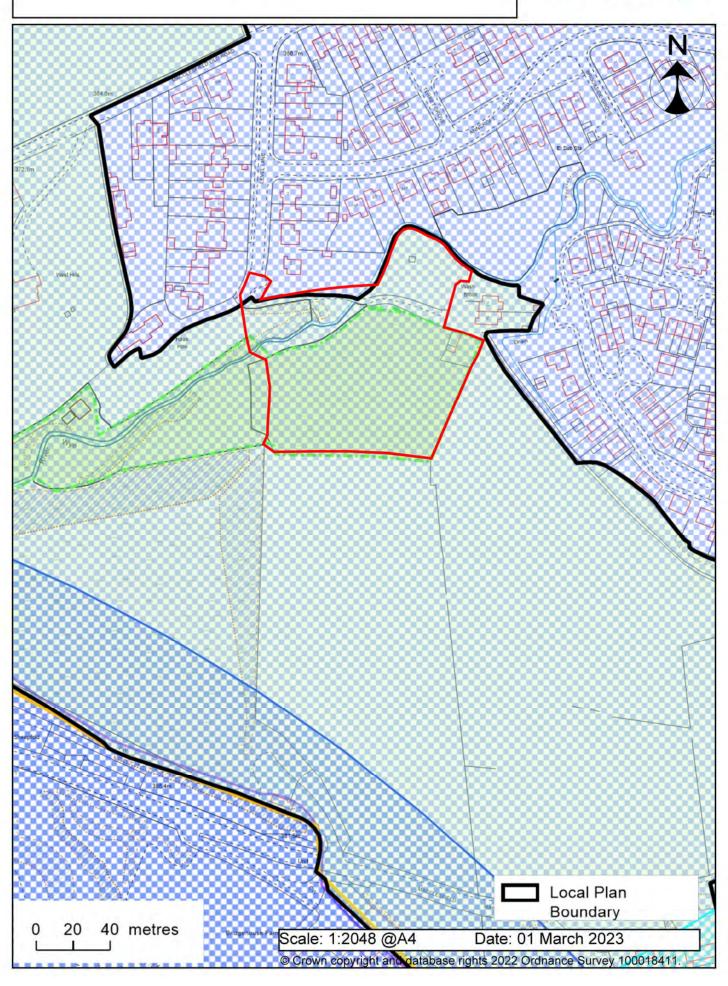
Question 12: Do you have any site suggestions for other uses that you think should be included in the Local Plan?

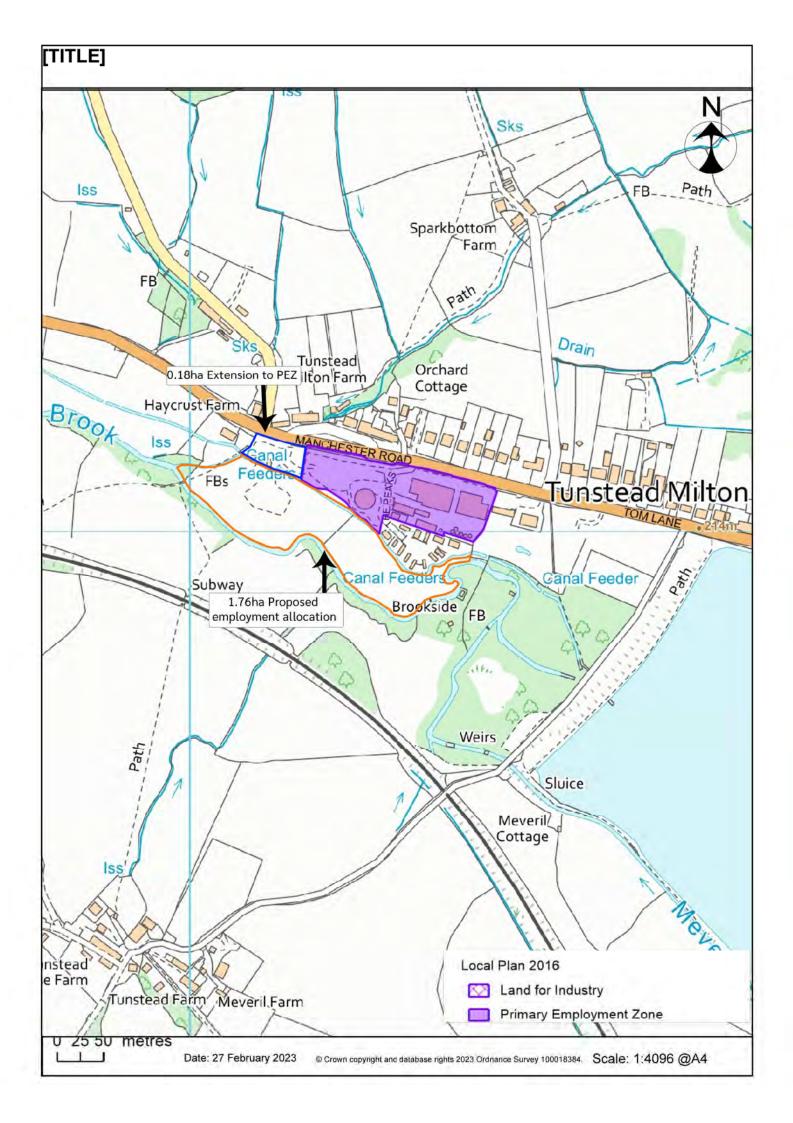


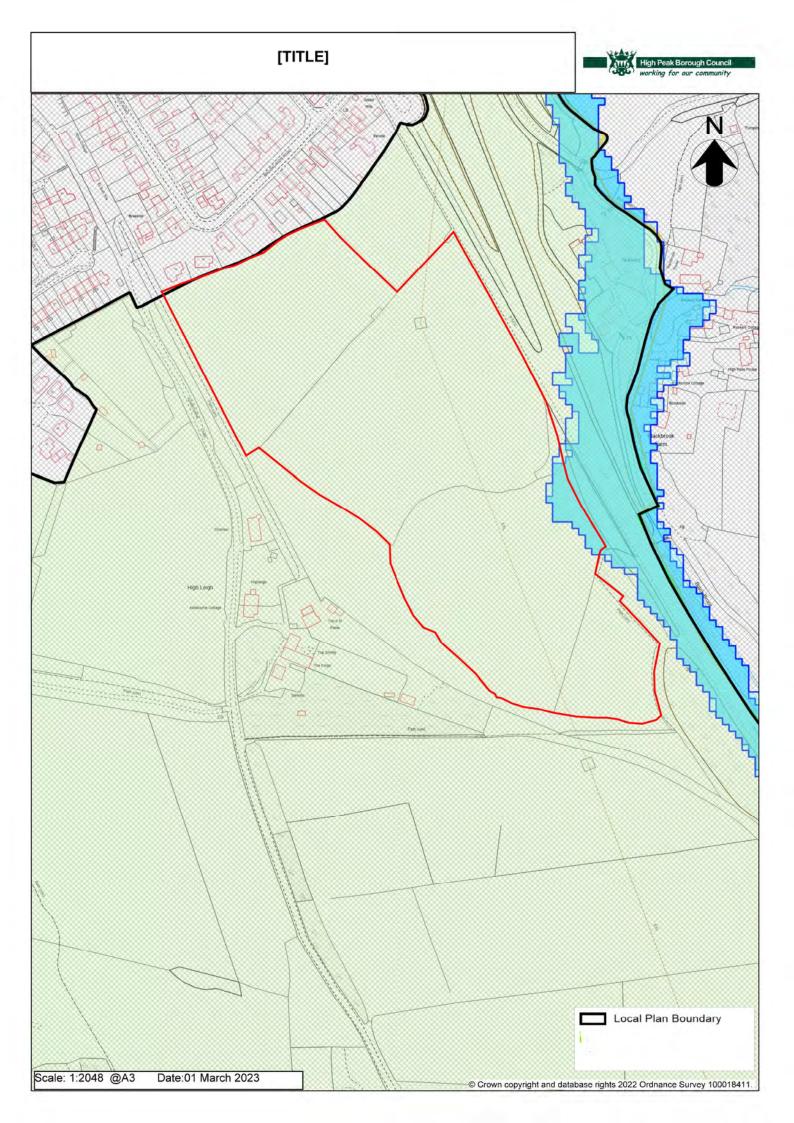
2.97 This is not applicable to these representations.

[TITLE]















Our ref: Your ref:

Planning Policy
High Peak Borough Council
Town Hall
Market Place
Buxton
Derbyshire
SK17 6EL



1 March 2023

Dear Sir / Madam

High Peak Local Plan Review

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015. We are responsible for operating, maintaining and improving the Strategic Road Network (SRN) in England, in accordance with the Licence issued by the Secretary of State for Transport (April 2015) and Government policies and objectives.

Our response to this consultation on the High Peak Local Plan Review is written in the context of statutory responsibilities as set out in National Highways' Licence, and in the light of Government policy and regulation, including the:

- National Planning Policy Framework (NPPF);
- Town and Country Planning Development Management (Procedure) Order (England) 2015 (DMPO); and
- DfT Circular 01/2022 The Strategic Road Network and the delivery of sustainable development ('the Circular').

As a statutory consultee in the planning system, National Highways has a regulatory duty to co-operate. Consequently, we are obliged to give consideration to all proposals received and to provide appropriate, timely and substantive responses.

Our desire to be a proactive planning partner goes beyond this statutory role and follows the spirit of the Licence which stipulates that National Highways should: "Support local and national economic growth and regeneration".



We encourage all parties promoting and preparing Plans that may have an impact on the SRN to engage with us as early as possible, to enable collaborative working and to deliver positive outcomes in a timely manner.

National Highways is committed to working with local authorities and plan-making bodies prior to and between formal consultation periods to contribute to the thinking, and to support the analysis of options and development of strong plans and proposals that take full account of highways issues.

The preparation and delivery of Local Plans provides an opportunity to identify and support a pattern of development that minimises trip generation at source and encourages the use of sustainable modes of transport, minimises journey lengths for employment, shopping, leisure, education and other activities, and promotes accessibility for all. This can contribute to environmental objectives and also reduce the cost to the economy arising from the environmental, business and social impacts associated with traffic generation and congestion.

In framing our contribution to the development of Local Plans, our aim will be to influence the scale and patterns of development so that it is planned in a manner which will not compromise the fulfilment of the primary purpose of the SRN. To that end, we look forward to gaining an understanding of the likely impact of any proposed allocations and policies on the SRN, and where work is being undertaken to develop a Transport Strategy for the borough.

In order to develop a robust transport evidence base, we will look to work with the High Peak to understand the transport implications of development options. This will include assessing the cumulative and individual impacts of the Local Plan proposals upon the ability of the road links and junctions affected to accommodate the forecast traffic flows in terms of capacity and safety. Such assessments should be carried out in line with current Department for Transport guidance or on a basis otherwise agreed with the National Highways.

Through the production of Local Plans, development should be promoted at locations that are or can be made sustainable, that allow for uptake of sustainable transport modes and support wider social and health objectives, and which support existing business sectors as well as enabling new growth.

We will look to work with High Peak Borough Council and developers to identify opportunities to introduce travel plan and demand management measures through the Local Plan. These will be based on existing and proposed patterns of development in a



manner that will support sustainable transport choice and retain capacity within the transport network so as to provide for further development in future Plan periods.

Strategic Road Network in the High Peak

National Highways is keen to engage in the Local Plan process to reduce the potential for creating congestion on the SRN and to help deliver sustainable growth within the boundary of the National Park, and this includes a short section of the A628 between Tintwistle and the A628/A616 'Flouch roundabout' junction just north of Langsett reservoir.

We expect that any development proposals along this corridor will include a full assessment of their potential impact on the route, based on the performance and character of the SRN (as determined by the presumption that any Local Plan proposals would be fully implemented). Any assessment should include the identification of any mitigation necessary, and we will seek to agree appropriate levels of assessment and mitigation in relation to the scale and impact of a development. All assessments should be submitted to National Highways for review. Any physical mitigation identified in the future as being required on the SRN would need to undergo a Stage 1 Road Safety Audit, undertaken prior to the submission of any planning application (post adoption of any plan by the Council).

Any such modelling, associated design works and delivery of required infrastructure improvements will be funded by proposers and/or third party funding outside of that identified (where applicable) in the government's RIS. It should be noted that the Road Investment Strategy (RIS) 2, published in March 2020, does not include any committed capacity enhancement schemes within the National Park boundary, nor are there any currently published government funded RIS3 pipeline schemes identified for the area. Where National Highways does not have committed investment, we will look to developments to identify schemes required by National Highways to be included in the Council's Infrastructure Delivery Plan (IDP).

We will work with you and other stakeholders to ensure that a robust transport evidence base for the Plan can be developed by third parties, and any such assessments on the SRN should be carried out in discussion with National Highways. As the policies above state, this engagement process with us could include, where appropriate, strategic site identification/housing land availability assessments/employment land availability assessments.



In terms of developing the evidence base for Plan making, we would note that transport data should be included that reflects the typical (neutral) flow conditions on the network (for example, non-school holiday periods, typical weather conditions etc) in the area of the Plan, and should be valid for the intended purposes. It should also take account of holiday periods in tourist areas, where peaks could occur in periods that might normally be considered non-neutral. Given that a significant proportion of demand on the SRN in the National Park could be visitor traffic, particularly during holiday periods, we would suggest that consideration should be given to these atypical demand patterns, both when forming the evidence base for Plan-making and in the assessment of individual planning applications.

We will also advise you where you identify opportunities to introduce travel plan and demand management measures through the Local Plan. We would note that development should be promoted at locations that are (or can be) made sustainable, either by minimising the need to travel or by facilitating the use of sustainable transport. Any capacity enhancements and infrastructure required to deliver strategic growth should be identified at the Local Plan stage and should not normally be considered as new proposals at the planning application stage.

Strategic Road Network outside the High Peak

Although limited to the A628 within the boundary of the High Peak, traffic generated from within the borough does have the potential to impact the SRN within neighbouring authorities. In particular, development within Glossop, Hadfield and the surrounding areas have the potential to increase demand on the SRN within Tameside, particularly around Woolley Bridge, Mottram and the M67 to M60 J24.

Where allocations within the Local Plan may impact these locations on the SRN, it is important that capacity enhancements and infrastructure required to deliver strategic growth are identified at this stage. This provides the best opportunity to consider development aspirations alongside the associated strategic infrastructure needs. Enhancements should not normally be considered as fresh proposals at the planning application stage. We will look to work with strategic delivery bodies to identify infrastructure and access needs at the earliest possible opportunity in order to assess suitability, viability and deliverability of such proposals, including the identification of potential funding arrangements.

Where a potential capacity need is identified, this will be considered and weighed alongside environmental and deliverability considerations. Additional capacity may be



considered in the context of National Highways' forward programme of works, balancing the needs of motorists and other road users with wider impact on the environment and the local/regional community.

Greater Manchester's Places for Everyone Plan

We have been working with the Greater Manchester Combined Authority (GMCA) and Transport for Greater Manchester (TfGM) for a number of years as they brought forward the combined Greater Manchester Spatial Framework, and latterly with the nine participating authorities within the Places for Everyone Plan (PfE).

In response to the transport evidence presented as part of the PfE consultation, National Highways signed a Statement of Common Ground with GMCA, on behalf of the nine participating authorities. This related to how the SRN would need to respond to the growth being proposed within the Plan.

Although outside the High Peak Local Plan area, the cumulative impacts of sites within the PfE Plan and the High Peak borough may lead to increased congestion and safety concerns on the SRN. It is therefore important that we continue to monitor how and when allocations are brought forward for development and whether there might be any cumulative impacts as a result.

Update to the DfT Circular

DfT Circular 02/2013, to which National Highways has formerly based its engagement with the Planning process, has recently been updated. <u>Circular 01/2022</u> was published in December 2022 and contains details on how National Highways will engage with the planning process going forward.

Net-Zero Carbon Transition

The Climate Change Committee's <u>2022 Report to Parliament</u> notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The National Planning Policy Framework supports this position, with paragraphs 73 and 105 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 104 and 110 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.



Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of <u>PAS2080</u> promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

These considerations should be taken into account within any relevant Local Plan policies to ensure that future planning decisions are in line with the necessary transition to net zero carbon.

Future Engagement

We welcome further engagement with High Peak Borough Council as you progress your Local Plan Review, and to that end will be keen to arrange future meetings to discuss the Plan's progress and how we might assist in its development.

In the meantime, if you would like to discuss anything further, please let me know at the email address below.

We look forward to working with you as your Plan develops.

Yours faithfully

Adam Johnson Spatial Planning Team

Email:





HIGH PEAK LOCAL PLAN EARLY ENGAGEMENT RESPONSE FORM

Responses invited from 19th January 2023 to 5pm on 3rd March 2023

The Local Plan sets out detailed policies and specific proposals for the development and use of land in High Peak (outside of the Peak District National Park). Your feedback will help the Council to identify the issues and options for the Local Plan for consultation later in 2023.

Your Contact Details:

	Personal details	Agent's details (if applicable)
Title	Mrs	5747.0
Name	Roslyn	
Job title (if applicable)	Deeming	
Organisation (if applicable)	Natural England	
Address		
Post code		
Telephone no.		
Email address		

PLEASE NOTE that responses must be attributable to named individuals or organisations. They will be held by the Council and will be available to view publicly and cannot be treated as confidential. Your contact details will not be published, but your name and organisation (if relevant) will. High Peak Borough Council maintains a database of consultees who wish to be kept informed about the Local Plan. Details of our data protection and Privacy Notice can be found on the council's website at: https://www.highpeak.gov.uk/YourData

Please complete and return this form by 5pm on 3rd March 2023

by email to: Idf@highpeak.gov.uk; or

by post to: Planning Policy, High Peak Borough Council, Town Hall, Buxton,

Derbyshire, SK17 6EL

Alternatively, you can respond online on the Local Plan consultation website https://highpeak-consult.objective.co.uk/kse.

Question 1

Do you agree with the Council's initial view of the emerging issues identified from the new evidence?

from the new evidence?		
(please select one answer)		
Vas .		

Yes √ No

If not, why?

Natural England agrees with the Council's initial view of the emerging issues. We are pleased to note that the following have been identified – Biodiversity Net Gain , Local Nature Recovery Strategies and the High Peak Plan for Nature, Climate Change adaptation and Nutrient Neutrality.

Question 2 Should the next Local Plan have a new Spatial Vision?

(please select one answer)

Yes $\sqrt{}$

Natural England advises that in the 4th paragraph of the existing vision that the Nature Recovery Network should be mentioned to reflect the provisions of the Environment Act 2021 eg:

Biodiversity in the Borough will be enhanced through habitat creation, restoration and the reconnection of isolated habitats which will contribute to the Nature Recovery Network.

If so, what should it say?

Question 3

Natural England consider that the existing objectives (2016 Adopted Plan) broadly cover the objectives that we would wish to see regarding the Natural Environment but suggest that they should be updated to reflect recent legislation and guidance.

SO2 should include the provision of Biodiversity Net Gain

SO5 should include the need to proactively plan for and reduce the impacts of climate change including the provision of nature-based solutions for adaptation to climate change such as green infrastructure, street trees and connecting natural habitats.

SO11 should include improving access to nature and green infrastructure to enhance people's well-being.

What should be the Strategic Objectives for the next Local Plan?

Question 4

Are there any other policies in the Local Plan that you think should be updated?

(please select one answer)

Yes	٨
No	

Natural England advise that the following policies should be updated to reflect the provisions of the Environment Act 2021 and the recently published Environmental Improvement Plan:

EQ1 Climate Change

Natural England suggests that the Climate Change policy should include guidance on "Nature-Based Solutions" which can play an important role in aiding climate change adaptation. Nature based solutions are measures such as green roofs and walls, street trees, SuDS, and the planting of wetlands and woodlands. This approach also includes the creation of a better linked habitat network by conserving, creating, or enlarging existing habitats which will build up resilience to climate change at a landscape scale. The policy should recognise the role of GI in climate change mitigation and adaptation.

Biodiversity EQ5

Biodiversity Net Gain - This policy should cover Biodiversity Net Gain – or alternatively this could be included in a separate policy. There should be a clear strategy for BNG delivery both within allocated sites for development, and across the Plan area. The policy should set out how biodiversity net gain will be delivered and managed and the priorities for habitat creation or enhancement in different parts of the plan area. It should set out the approach to onsite and offsite delivery. Natural England advises that on-site provision should be preferred as it helps to provide gains close to where a loss may have taken place. Off-site contributions may, however, be required due to limitations on-site or where this best meets wider biodiversity objectives set in the development plan. Further detail could be set out in a supplementary planning document. The policy could also usefully link to any complementary strategies or objectives in the plan, such as green infrastructure. Your council may want to consider the use of biodiversity opportunity mapping and the Natural Capital Strategy which is under preparation via Derbyshire County Council and we are pleased to note that a High Peak Plan for Nature is already being prepared.

Local Nature Recovery Strategies - Local Nature Recovery Strategies should be included in EQ5 (or a separate policy). Local Nature Recovery Strategies (LNRS) are a flagship measure arising from the Government's 25 Year Environment Plan, enacted through The Environment Act 2021. They are a new system of spatial strategies for nature which will plan, map, and help drive more coordinated, practical, focussed action and investment in nature recovery, to collectively feed into the national Nature Recovery Network.

Derbyshire will appoint a responsible authority to lead and produce an LNRS, in close collaboration with partners. The expectation is that this will be a locally led, transparent and inclusive planning strategy and set of tools to help decision-makers make positive choices, with a focus on wider stakeholder engagement and broader benefits for nature and people that include and go beyond biodiversity.

Green Infrastructure EQ8

We suggest that policy EQ8 should reference the Natural England Green Infrastructure Guidance: Principles & Standards which has recently been launched. This includes a GI Design Guide and a mapping tool which can identify existing GI provision and areas where there is a lack of access to green space. Please see this link: Green Infrastructure Home (naturalengland.org.uk)

Blue Infrastructure (i.e. rivers and other watercourses) should also be included in the policy wording.

Your authority may want to consider preparing a Green Infrastructure Strategy to support the Local Plan. Producing a separate GI strategy to inform or supplement other policies and plans

include	re any other new policies that you think the next Local Plan should
Yes	V
No	
Please	specify what the new policy should seek to address and why.

Natural England suggest that Biodiversity Net Gain, Local Nature Recovery Strategies, Nature-base solutions for climate change and reference to the Green infrastructure Framework should either be included in updated policies or in new policies (see above at Question 4)

Nutrient Neutrality as mentioned in the Early Engagement document should appear as a new policy.

We suggest that the Plan should have a policy for the protection of and sustainable management of soils (or possibly as part of EQ10).

Question 6

What other evidence should the Council consider to inform the next Local Plan?

Natural England suggest the following evidence should be considered:		
A Green Infrastructure Strategy (informed by the Green Infrastructure Framework) including mapping of GI areas		
Biodiversity Opportunity Mapping (this may be included in the High Peaks Plan for Nature; also Derbyshire's Natural Capital Strategy maybe helpful)		
Question 7 & 8 Do you have any site suggestions for housing and / or employment?		
If you would like to suggest several sites, please submit a separate form for each one.		
What is your interest in the site? (please select all that apply)		
Owner of the site		
Parish / Town Council		
Local resident		
Amenity / Community Group		
Planning Consultant		

Land Agent	
Developer	
Other	
Other (please specify)	
Are you the sole or part owner of the site?	
(please select one answer)	
Sole Owner	
Part Owner	
Neither	
If you are not the landowner or the site is in m the name, address and contact details of the l provided	
If not the landowner, I confirm that the landow site submission (please select one answer)	ner/s have been informed of this
Yes	

No	
Does the owner(s) support the development of the site? (please select one answer)	
Yes	
No	
Site location (including grid reference and postcode if known)	
Site Area (hectares)	
Current Land Use(s) e.g. agriculture, employment, unused/vac	ant etc.
Type of site e.g. greenfield, previously developed land/brownfi	ield

Please provide a site plan clearly identifying the exact bo	oundaries of the site.
Proposed Future Uses & Potential Site Capacity (please (please select all that apply)	specify)
Housing	
Employment	
Mixed-use (please specify uses)	
Self-build & custom-build housing	
Basic Capacity Information – area/number of dwellings/nunits/proposed floorspace	number of
Market interest - please choose the most appropriate cat indicate what level of market interest there is/has recent (please select all that apply)	<u> </u>
Site is owned by a developer	
Site is under option to a developer	
Enquiries received/ strong interest	
Site is currently being marketed	

None	
Not Known	
Comments on market interest	
Utilities - Please tell us which of the following utilities are a (please select all that apply)	available to the site
Mains water supply	
Mains sewerage	
Electric supply	
Gas supply	
Public highway	
Landline telephone/broadband internet	
Public Transport	
Other (please specify)	

Utilities – comments	
Constraints - Please tell us which of the following constraints are the site (please select all that apply)	re applicable to
Land in other ownership must be acquired to enable the site to be de	eveloped
Restrictive covenants exist	
Current land use(s) need to be relocated	
Physical constraints (topography, trees, other)	
Flood Risk	
Infrastructure required	
Public rights of way cross or adjoin the site	
Land contamination	
Access constraints	
Environmental constraints	

Please provide any relevant information of likely measu above constraints	res to overcome the
Timescales - Please indicate the approximate timescale become available for development	for when the site will
(please select one answer)	
Immediately	
Up to 5 years	
5 - 10 years	
10 – 15 years	
Beyond 15 years	
Unknown	

Timescales comments – particularly if you have indicated that the site is not immediately available, please explain why
Other Relevant Information – Please use the space below for additional information
Question 9
Do you have any site suggestions for Local Green Spaces?
If you would like to suggest several sites, please submit a separate form for each one.
Site location (including grid reference and postcode if known)

Please provide a	site plan clearly i	dentifying the 6	exact boundaries	of the site.
Location - Is the	site in reasonably	close proximit	ty to the commun	ity it serves?

Local Significance - Is the site demonstrably special to a local community and holds a particular local significance, e.g. due to its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife?

Size / Scale - Is	the site local in	ı character and	l not an extens	ive tract of land?
If possible, plea comments.	ase provide pho	tographs of th	e site that supp	oort your

Question 10

Do you have any site suggestions for ecological improvements?

If you would like to suggest several sites, please submit a separate form for each

one.	erai sites, piease i	subiliit a sepai	ale form for each
Site location (including grid r	eference and pos	stcode if knov	vn)
Please provide a site plan cle	arly identifying t	he exact bour	ndaries of the site.
Do you own the site? (please select one answer)			
Yes (full ownership)			
Yes (part ownership)			
No			
Please specify if you also ow	n/control adjacer	nt land.	
, 10000 opoony you also s			

y prevent
ıntil when.
ng issues,

Question 11 Do you have any site suggestions for renewable energy?

If you would like to suggest several sites, please submit a separate form for each one.

Site location (including grid reference and postcode if known)				
Please provide a site plan clearly identifying the ex	act boundaries of the site.			
Please specify the proposed type and scale of ener (MW), Height to tip (m), Height to hub (m))	rgy development (Capacity			
Do you own the site? (please select one answer)				
Yes (full ownership)				
Yes (part ownership)				
No				

How can the site be accessed? Are there any restrictions that may prevent access e.g. third party ownership?	t
Please specify known designations (ecological / environmental / historical or around the proposed site) on
Current land use (including agricultural land quality rating if relevant)	
Proposed grid connection point (if known)	

Question 12 Do you have any site suggestions for other uses that you think should be included in the Local Plan? What use is the site proposed for? Site location (including grid reference and postcode if known) Please provide a site plan clearly identifying the exact boundaries of the site. Do you own the site? (please select one answer) Yes (full ownership) Yes (part ownership) No

How can the site be accessed? Are there any restrictions that may prevent access e.g. third party ownership?
Please specify known designations (ecological / environmental / historical) on or around the proposed site
Current land use
Signature Roslyn Deeming
Date 22/02/2023

Thank you for completing this response form.



HIGH PEAK LOCAL PLAN EARLY ENGAGEMENT RESPONSE FORM

Responses invited from 19th January 2023 to 5pm on 3rd March 2023

The Local Plan sets out detailed policies and specific proposals for the development and use of land in High Peak (outside of the Peak District National Park). Your feedback will help the Council to identify the issues and options for the Local Plan for consultation later in 2023.

Your Contact Details:

	Personal details	Agent's details (if applicable)
Title	Mr	
Name	Julian Ashworth	
Job title (if applicable)		
Organisation (if applicable)	Nature New Mills	
Address		
Post code		
Telephone no.		
Email address		

PLEASE NOTE that responses must be attributable to named individuals or organisations. They will be held by the Council and will be available to view publicly and cannot be treated as confidential. Your contact details will not be published, but your name and organisation (if relevant) will. High Peak Borough Council maintains a database of consultees who wish to be kept informed about the Local Plan. Details of our data protection and Privacy Notice can be found on the council's website at: https://www.highpeak.gov.uk/YourData

Please complete and return this form by 5pm on 3rd March 2023

by email to: ldf@highpeak.gov.uk; or

by post to: Planning Policy, High Peak Borough Council, Town Hall, Buxton,

Derbyshire, SK17 6EL

Alternatively, you can respond online on the Local Plan consultation website https://highpeak-consult.objective.co.uk/kse.

Question 1

Do you agree with the Council's initial view of the emerging issues identified

from	om the new evidence? lease select one answer)		
Yes			
No	x		

If not, why?

Additional emerging issues should be included:

- 1. reference to the emerging national crisis with river water quality caused by inadequate sewage treatment facilities and agricultural run-off, both of which can be mitigated by land use and mitigation measures.
- 2. Reference to the emerging issue of poor air quality in towns caused by high particulate concentrations, a major source of which is wood burning in domestic and commercial properties.
- 3. Very careful consideration needs to be given to the application within High Peak of any biodiversity credits national scheme. The experiences to date with carbon credits indicate that there is a likelihood of it being used by traders as a money-making opportunity rather than it genuinely benefiting the environment. Local involvement in this scheme will need safeguards to ensure High Peak extracts practical benefit. It is unclear to us how a suitable value can be put on a habitat, and how any confidence can be had that it can be wholly ameliorated by provision elsewhere. Even if this could be done, it will require excellent monitoring and enforcement, which the Council is unable to provide at the moment for existing planning requirements due to underfunding.

Question 2 Should the next Local Plan have a new Spatial Vision? (please select one answer)

Yes	х
No	

If so, what should it say?

Whilst we recognise the desire to preserve landscape character, there is a requirement in the current situation of depleted biodiversity and rapidly changing climate (as recognised by the Council declaring a climate emergency) that the landscape character will have to change to some extent in order to replenish habitats and allow for mitigation against the effects of climate change such as flooding and wildfires. The Local Plan needs to accommodate a revised vision in line with work on the High Peak Plan for Nature, DWT Derwent Connections and Wild Peak projects to allow that landscape change to happen.

Question 3 What should be the Strategic Objectives for the next Local Plan?

The halting of biodiversity loss should be explicitly stated as an objective, or encompassed with existing objective S05.

The conflation of climate change with other environmental problems is a theme of the 2016 Local Plan, particularly in the explanatory text sections. Whilst there are links between most of these problems, they are not the same thing, and should be referred to in more specific ways if they are to be understood and dealt with properluy.

Question 4

Are there any other policies in the Local Plan that you think should be updated?(please select one answer)

Yes	Х
No	

Policy S1 should specifically include, as well as minimising carbon or energy impacts, an avoidance of other types of pollution, particularly:

- air pollution by particulates from wood burning appliances,
- the problem of light pollution, given the impact this has on insect populations and the resultant effects on these ecosystems
- poor water quality caused by inadequate sewage management capacity and agricultural run-off.

Policy S1 should strengthen the reference to biodiversity to allow for stronger protection and enhancement of nature.

Policy EQ2 should allow for landscapes to change their character in order to increase biodiversity and provide mitigation for the effects of climate change (such as flooding and wildfires)

Policy EQ8 could include 'green infrastructure' which has as its primary purpose nature connectivity, rather than at present where it is primarily for human purposes with an assumed added benefit for wildlife. It could also require the planting of street trees to provide mitigation from the effects of climate change through cooling and shading.

Policy EQ9 could refer to the use of appropriate native and locally sourced species for tree replacement schemes. It could also require the planting of street trees to provide mitigation from the effects of climate change through cooling and shading.

Policy EQ10 – in particular para 5.86 which states air quality is generally good. This might have been the case in 2016, but now this is evidently not so, due to increased prevalence of woodburning and resultant small particulate pollution.

Please specify which policy and how it should be updated.

includ	ere any other new policies that you think the next Local Plan should
Yes	
No	х
Please	e specify what the new policy should seek to address and why.

Question 6

What other evidence should the Council consider to inform the next Local Plan?

Nature Recovery Strategies, Environment Act

Woodburning stove air pollution latest evidence, extensively covered in The Guardian newspaper amongst others.

Question 9

Do you have any site suggestions for Local Green Spaces?

If you would like to suggest several sites, please submit a separate form for each one.

- 1) The Picker / Ladyshawe Bottom
- 2) Knathole Woods
- 3) Woodland to east of Brookbottom, round Clough Bank Farm and towards Shaw Farm
- 4) Golden Springs fields

Site location (including grid reference and postcode if known)

Please provide a site plan clearly identifying the exact boundaries of the site.

Grid References given for each as follows:

- 1) The Picker / Ladyshawe Bottom: 400380 386088 SK22 4DJ
- 2) Knathole Woods, bordering Newtown recreation area: 399678 385173 SK22 3JA
- 3) Woodland to east of Brookbottom, round Clough Bank Farm and towards Shaw Farm: 398745 386495 SK22 3AY
- 4) St Andrews Brook woodland 400629 385583 SK22 4JZ
- 5) Golden Springs fields: 400397 387533 SK22 1AY

Location - Is the site in reasonably close proximity to the community it serves?

1 TO 5. Yes

Local Significance - Is the site demonstrably special to a local community and holds a particular local significance, e.g. due to its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife?

Wildlife and recreation 2-5)Tranquility, wildlife	
Size / Scale - Is the site local in character and not an extensiv	ve tract of land?
1 to 7. Yes, local in character	
If possible, please provide photographs of the site that supp	ort your
comments.	

Question 10

Do you have any site suggestions for ecological improvements?

If you would like to suggest several sites, please submit a separate form for each one.

Site location (including grid reference and postcode if known)

- 1) The Picker / Ladyshawe Bottom 400380 386088 SK22 4DJ
- 2) Fields to north of Goytside Meadows, north and south of Midland railway viaduct 400158 384918 SK23 7PY
- 3) Fields above Brookbottom Road 398951 386092 SK22 3AY

Nature New Mills also support all the proposals for wildlife sites put forward in the current Local plan.

_	own the site? select one answer)		
es (full	ownership)		
⁄es (par	rt ownership)		
No		х	
Please s	specify if you also own/contro	adjacent land.	
No			
		ere any restrictions that may pr	revent
ccess	e.g. third party ownership?	ere any restrictions that may pr	revent
Not know			revent
Not known Public Ri	e.g. third party ownership? wn, private ownership lights of Way cross these areas as follo Picker: Footpath 110 Goytside: None	ws:	revent
Not known Public Ri	e.g. third party ownership? own, private ownership lights of Way cross these areas as follow Picker: Footpath 110	ws:	revent
Not known Public Ri	e.g. third party ownership? wn, private ownership lights of Way cross these areas as follo Picker: Footpath 110 Goytside: None	ws:	revent

Please provide any details of factors affecting the site (e.g. flooding issues, topography, notable species possibly present on site etc.)

Not known. Sites could be wilded to improve biodiversity in accordance with government policy, and provide strategically important wildlife habitats by extending existing nature reserves (Goytside) or connecting habitats (Brookbottom Road and The Picker)

gnature
D.J.Ashworth
ate2 nd March 2023
ale2" Warch 2025

Thank you for completing this response form.



Date: 15/02/2023 NHS Property Services



For the attention of the Planning Policy Department,

High Peak Local Plan – Early Engagement

Thank you for the opportunity to comment on the above document. The following comments are submitted by NHS Property Services (NHSPS).

Introducing NHS Property Services

NHSPS was established on the 1 April 2013 and is an organisation that plays a vital role in the day to day running of the NHS, managing and developing over 4,000 properties across England. The estate includes;

- Primary Care Properties
- Community Care Properties
- GP Practices
- Administrative Buildings

Whilst being a private limited company, NHSPS is 100 per cent owned by the Secretary of State for Health, and at the same time, an important member of the wider NHS family.

One of NHSPS main roles is strategic estates management. This involves acting as a landlord, modernising facilities, buying new facilities and selling facilities the NHS no longer needs.

As part of this strategic estates management, NHSPS looks to play an influential role in the planning process, ensuring that future requirements for health are accurately measured and planned for, and is proactively engaged in the production of development planning documents across England.

NHSPS also works with Integrated Care Systems (ICSs), as well as NHS England/Improvement to ensure that the NHS is sufficiently protected and enhanced through the planning system, both at a national and local level.

We welcome the opportunity to comment on the emerging Local Plan and would like to set out some priorities for NHSPS at this early stage of the consultation process.



- 1. It is essential that all planning policies enable flexibility within the NHS estate. Where it can be demonstrated that health facilities will be changed as part of wider NHS estate reorganisation programmes, it should be accepted that a facility is neither needed nor viable for its current use and Planning policies within the Local Plan must support the principle of alternative uses for NHS land and property. This will ensure that there is not a delay to vital reinvestment in facilities and services for the community.
- NHS land and property should be able to grow and expand on existing NHS sites and on land across the borough unhindered. Policies should support the delivery of public service improvements as quickly as possible and allow for adaption to meet changing needs for health buildings.
- 3. There is a well-established connection between planning and health. Planning policies can not only facilitate improvements to health infrastructure, but also provide a mechanism to improve people's health. We request that the Local Plan includes policies for health and wellbeing which reflect the wider determinants of health and promote healthy and green lifestyle choices through well designed places.
- 4. In areas of significant housing growth, appropriate funding must be consistently leveraged through developer contributions for health and care services in order to meet growing demand. We request that when setting planning obligation policies, the Council seek to address strategic as well as local priorities in planning obligations and engage the NHS in the process as early as possible.

NHSPS thanks the Council for the opportunity to comment on the Local Plan – Early Engagement and look forward to working with you to ensure that the needs of the health service are taken into consideration.

We would request that NHSPS be added to the consultation database, and we be notified on the progression of all planning policy consultations in the future.

Kind regards

Rowan Gilbert
Senior Town Planner
NHS Property Services Limited



March 2nd, 2023

Old Glossop Residents Association have the following comments on the Local Plan Early Engagement Document with particular reference to Old Glossop and the wider Glossop area. We found it difficult to put forward our responses in the response form so have put them in this document, referencing which question they refer to.

We begin with a brief summary before looking at specific issues in more detail.

Summary

- Q1 The document contains many goals but no detail on how these might be achieved.
- Q1 The infrastructure in Glossop needs to be improved but the document has no details on how this will be achieved. This is a fundamental need without this Glossop cannot flourish.
- Q1 The infrastructure in Glossop needs to meet the needs of people (particularly young people) seeking employment: hospitality jobs are notoriously unsocial hours on minimum wage pay - without reliable buses and trains servicing areas where there are job opportunities, people will not be able to take these jobs. This is currently an issue in Glossop.
- Q1 Employment opportunities need to be created for the population base we have. There is
 a need for more jobs in the area but the location of these jobs must be accessible by
 reliable public transport, a lack of which is currently a major cause of concern. The council
 should look at incentives for employers to train and employ local people to boost the local
 economy.
- **Q2** There needs to be a Spatial Vision but it needs to be realistic; in the High Peak there are no "market towns" given the reduction and near eradication of the market culture. Neither Buxton nor Glossop are actually market towns.
- Q2 More emphasis is needed on how the council will ensure the townscape and landscape are protected. Recent new developments have notoriously lacked biodiversity with gardens being replaced with stone, tarmacadam or artificial grass. With all new housing having to provide at least 1.5 cars her housing unit, generally worked up to 2 per house, this gives rise to a townscape of car parks.
- Q3 The council needs to look objectively at the strategic objectives and give strong, clear, guidelines as to how these objectives are to be met; without clarity there is too much compromise at the expense of the residents, area and biodiversity - and not enough doctors, dentists or schools.
- Q9 Land east of Bute Street (HPK/2019/0215), G12 on the existing Local Plan and the adjoining land off Blackshaw Clough (HPK/2021/0416) should be made a Designated Local Green Space.



Q1

Impact of working from home

The document states that the subsequent increase in the number of people working from home due to the Covid-19 pandemic may have long term implications for our towns and villages from the demand for local services to the type of housing required and demand for transport infrastructure and services.

Whilst there was a substantial increase in the number of people working from home during the pandemic, this is now past its peak. Many employers, with government encouragement, now require workers to return to their place of work for at least part of the working week.

Q1 The 2021 Environment Act

The statutory obligation for development to achieve a 10% net gain in biodiversity from November 2023 is particularly welcome in Old Glossop but enforcement of such requirements will be important. The development of the former Hawkshead Mill site in Old Glossop, adjacent to the National Park, has resulted in a net loss in biodiversity due to the developer failing to comply with conditions aimed at protecting bats and other wildlife such as appropriate landscaping and relocating the bats safely.

Q1 Overall housing need and distribution

Based on the figures stated in the document, an annual housing requirement of 260 homes with 30-40% in the Central Area and Glossop would equate to 78-104 homes; an annual housing requirement of 364 homes would equate to 109-145. When assessing potential sites, consideration should be given to the existing infrastructure and what improvements would need to be made as well as the impact on biodiversity.

Q1 Affordable housing need

The definition of affordable housing as well as the size of development sites has been changed. The requirement now is only for larger developments to provide affordable housing but this to be 30% of the total houses being built, of which 65% for social renting & 35% for First Home schemes. This will result in less affordable housing available in areas where only small developments are to be built.

Q1 Housing mix and type

Information about the population of the borough, from the last census, shows a smaller growth than expected (<0.1%). It also shows a population increase for 65+ (26%), a decrease for 15-64 (5%) & a decrease of under 15s.(6.8%).

The huge increase in the 65+ population suggests the housing in the Glossop area is already suitable. It also highlights the area's desirability as somewhere to retire to, not work. Therefore it does not account for the increase in the recommendation for 3+ bedroomed houses for people who are retired - and this increase in larger houses will take the houses out of the price range of local people, local families and people working locally. Opportunities for business starts ups are required but these impact on the housing required because new businesses often struggle initially. This makes commuting and housing costs more of a challenge. With high housing costs and poor infrastructure there is no need to choose to live in Glossop.

Q1 Future Retail Needs

Glossop is well served by the current supermarkets – Tesco, Aldi, Lidl – plus the M&S Simply Food Store. The market hall development should enhance the food offering in Glossop but the impact on existing food outlets in the town centre needs to be considered.

The amount of vacant non-food retail outlets is a concern in Glossop, particularly those sites that have been vacant for more than a year, e.g. units at Howard Town Mill and Wren Nest Mill, and the former Barclays Bank premises on the High Street. More needs to be done to encourage take-up of these units.

Q1 Future Leisure Needs

With the Council's bid for Levelling Up funding to provide new leisure and wellbeing and enhanced cultural facilities for Glossop being unsuccessful, alternative ways of providing the modern health and leisure and arts and cultural amenities that are needed in Glossop need to be identified. The former Glossopdale School site on Talbot Road is ready for development. How it should be developed to meet the needs of the local population needs to be reconsidered and based on the latest Census information pertinent to Glossop.

Glossop is a popular place for young couples and new families to settle but, as children grow into teenagers, the area has poor provision. There is much need for leisure facilities for this age group, e.g. cinema, bowling, ice skating, new leisure centre, teen bars serving soft drinks with games areas. This is short term input for long term gain regarding physical and mental health for the future of our town. Building relationships at this age means strong communities for the future.

Given the changes in population from the last census, an increase of 27% in the 65+ age range, it is clear this age group are contributing to the demand for leisure activities in the area – and Glossop's proximity to Manchester and Sheffield support it as a commuter belt and as a leisure destination. The leisure industry however has limited opportunities for pay and often relies on the young people of the area to fulfil the employment opportunities this brings. A matter of concern is that Glossop youth unemployment is consistently above the national average despite its growing foodie culture. Poor infrastructure will also prevent people coming to work in Glossop as well as preventing people being able to take employment opportunities that require travel at unsociable times.



Q1 Town Centre Health

Health and social care provision has not increased in Glossop since the current Local Plan was adopted. There has been no increase in the number of GPs to match the increase in population generated by the new housing. There are no dental practices in Glossop taking on new NHS patients.

The closure of Shire Hill Hospital in 2018 meant that the Intermediate Care provided there for Glossop residents (mainly elderly) moved to the Stamford Unit at Tameside Hospital. There is no direct bus service to Tameside Hospital from Glossop and no direct train service to Stalybridge or Ashton-under-Lyne to get a bus to Tameside Hospital. The traffic between Glossop and Tameside Hospital is extremely heavy due to lack of investment in the road infrastructure.

The closure of Shire Hill Hospital has resulted in a degeneration in health and social care provision for the residents of Glossop and needs addressing through investment in both health and social care provision and the transport infrastructure.

There is a need for an NHS Walk-In Centre in Glossop and for additional primary care facilities in Glossop. These could be expanded at the current site on George Street or a new facility built on the former Glossopdale School site to meet the growing needs of Glossop residents and the current site to be redeveloped for housing.

Q1 Schools

The number of school places in Glossop has failed to keep pace with the increase in population due to new housing developments. An extension is currently being built at Glossopdale School to accommodate the extra pupils from housing developments already approved but there are no plans in place to accommodate the extra pupils from future developments.

In the current Local Plan, All Saints School in Old Glossop was due to be extended but this hasn't happened. It would need to be extended to accommodate pupils resulting from future developments.

Q1 | Traffic and highways

Old Glossop is a self-contained area with a maze of narrow, winding streets originally built for horse and cart. There is only one highway providing access from Glossop into Old Glossop – running from Church Street, becoming Church Street South, then Manor Park Road (or vice versa).

The centre of the village is a conservation area. It attracts many visitors and retaining the character of the village is important. There is very little public parking available in Old Glossop. The impact of new housing developments over the past 10 years has been an increase in on-road parking, including at road junctions. This has resulted in access for wheelchairs, mobility scooters, prams and buggies being obstructed regularly and, on occasion, access being obstructed to the local bus and to emergency vehicles. Any new



developments would need suitable roads and parking to safely accommodate residents and visitors, and consideration would need to be given to the impact on the adjoining roads.

The amount of traffic coming through Old Glossop is a concern. Church Street is being used as a cut through/rat run by motorists avoiding Glossop town centre traffic lights. The extra traffic generated by the building of 30 homes at the Hawkshead Mill site has exacerbated traffic problems. The building of nearly 100 homes at Eastern Mill off High Street East (HPK/2022/0317) will inevitably increase the amount of traffic cutting through Old Glossop. There is already a need for the highway authority (Derbyshire County Council) to look at measures to reduce the impact of the road through Old Glossop being used a cut through. One solution could be to reopen King Edward Avenue to through traffic.

Traffic congestion is a significant issue within Glossop. Since the Local Plan was adopted, traffic in Glossop and Old Glossop has increased due to the number of new houses built; however train and bus services to and from Glossop have been reduced and no new relief roads have been constructed. The long-awaited Mottram Bypass & Glossop Spur is still waiting to be built and a legal challenge to it currently being considered. Realistically, until transport links are improved significantly, Glossop will maintain its reputation as a travel bottleneck with considerable delays and congestion, even for those travelling through, let alone around the area. The highway infrastructure in and around Glossop needs to be improved.

Q1 | Air Quality & Clean Air Policy

Since the Local Plan was adopted, the Borough Council has designated two Air Quality Management Areas (AQMA) in High Peak: Tintwistle AQMA (on the A628 Woodhead Road) and; Dinting Vale AQMA (on the A57 Dinting Vale Road) The Council is preparing Air Quality Action Plans (AQAP) in response to the declarations of the Tintwistle and Dinting Vale AQMAs to deliver improvements to air quality.

Has the air quality improved over the years or got worse due to excess traffic in these areas? Have the new developments contributed to this? It becomes more and more difficult to enter or leave Glossop for most of the day.

Derbyshire County Council Clean Air policy aims to promote a sustainable development through its lifetime by minimising resource use and maximising energy efficiency. For any new development to be truly sustainable it must address social, economic and environmental issues.

Motor vehicle exhaust fumes account for 25% of all carbon emissions and are a key contributor to climate change. Given that the National Climate and Carbon Reduction Manifesto adopted by DCC promotes the use of electric cars, all new houses in High Peak should include electric car charge points. All new houses should have low carbon heating systems such as ground/air source heat pumps or hydrogen ready boilers. Doing this would fulfil the NPFF requirement to create sustainable developments.



Q1

High Peak Plan for Nature

Once complete, the Plan for Nature will inform Local Plan policies and site designations in terms of biodiversity enhancements and protection. In particular, it will help the Local Plan to support the legal requirement for biodiversity net gain whilst supporting wider local priorities and objectives. The reality is that many developers take scant notice of any planning conditions relating to biodiversity. The development of the former Hawkshead Mill site in Old Glossop has decimated wildlife in the area. Bats were driven out when the site was being cleared while deer and other wildlife had their corridor taken away by the construction of the boundary fence.

Greenfield sites should not be developed unless absolutely necessary in order to protect and enhance biodiversity. Any development proposals for a greenfield site should include provision for the natural environment. Surrounding trees and hedges must be protected and native trees and hedges should be included front and back. Bird, bat and swift boxes and hedgehog friendly fencing are all needed as all are present in the immediate area. Rigorous enforcement will be vital.

Q2

Spatial Vision

The aspiration for Glossop to build on its growing reputation as a destination for high-quality food and drink to provide a compelling mix of retail and leisure opportunities in an appealing town centre environment needs some substance behind it.

Getting the mix right is important. Whilst Glossop has built a reputation for high-quality food and drink, it's vital that it's not expanded too far and existing independent businesses are pushed out. It's also important to bear in mind that Glossop does not have an extensive car-free zone for cafes/bars/restaurants to gather round. The market hall development should enhance the food offering in Glossop but the impact on existing food outlets in the town centre needs to be considered.

The amount of vacant non-food retail outlets is a concern in Glossop, particularly those sites that have been vacant for more than a year, e.g. at Howard Town Mill and Wren Nest Mill. These started out as promising and attractive shopping areas but have been reduced to a bleak collection of empty stores. Work needs to be done to encourage take-up of these units. Visitors are not going to come into Glossop just for the food and drink. There's a danger that visitor numbers will fall because of the reduced offering of independent retail outlets, not to mention the difficulties of getting in and out of Glossop due to traffic and unreliable and inadequate bus and rail services.

Q9

Site suggestion for Local Green Space

Land east of Bute Street (HPK/2019/0215), G12 on the existing Local Plan and the adjoining land off Blackshaw Clough (HPK/2021/0416). This land forms an important corridor for wildlife from the adjoining National Park. The development of the adjacent former Hawkshead Mill site has decimated wildlife in the area. Bats were driven out when



the site was being cleared while deer and other wildlife had their corridor taken away by the construction of the boundary fence. Preserving the remaining habitat is important.

The land east of Bute Street is also an important soakaway to reduce the risk of flooding in the Old Glossop Conservation Area. When the former Hawkshead Mill site was developed for housing, the developers failed to restore the overflow drain to the satisfaction of the Lead Local Flood Authority (LLFA). As a result, the LLFA opposed the development of HPK/2021/0416. We believe that failing to restore the overflow drain as specified by the LLFA also affects the adjoining land east of Bute Street (HPK/2019/0215) so it should be removed from the current Local Plan.

These two greenfield sites should be made a Designated Local Green Space in order to protect and enhance biodiversity.

Janet Bingham Secretary Old Glossop Residents Association



HIGH PEAK LOCAL PLAN EARLY ENGAGEMENT RESPONSE FORM

Responses invited from 19th January 2023 to 5pm on 3rd March 2023

The Local Plan sets out detailed policies and specific proposals for the development and use of land in High Peak (outside of the Peak District National Park). Your feedback will help the Council to identify the issues and options for the Local Plan for consultation later in 2023.

Your Contact Details:

	Personal details	Agent's details (if applicable)
Title	Mr	Mrs
Name	T Woolley	Caroline Payne
Job title (if applicable)		
Organisation (if applicable)	P & V Woolley Ltd	Emery Planning Partnership
Address	c/o agent	
Post code		
Telephone no.		
Email address		

PLEASE NOTE that responses must be attributable to named individuals or organisations. They will be held by the Council and will be available to view publicly and cannot be treated as confidential. Your contact details will not be published, but your name and organisation (if relevant) will. High Peak Borough Council maintains a database of consultees who wish to be kept informed about the Local Plan. Details of our data protection and Privacy Notice can be found on the council's website at: https://www.highpeak.gov.uk/YourData

Please complete and return this form by 5pm on 3rd March 2023

by email to: ldf@highpeak.gov.uk; or

by post to: Planning Policy, High Peak Borough Council, Town Hall, Buxton,

Derbyshire, SK17 6EL

Alternatively, you can respond online on the Local Plan consultation website https://highpeak-consult.objective.co.uk/kse.

Question 1 Do you agree with the Council's initial view of the emerging issues identified from the new evidence? (please select one answer)
Yes
No N
If not, why?
See attached statement.
Question 2 Should the next Local Plan have a new Spatial Vision? (please select one answer)
Yes Y No
If so, what should it say?
See attached statement

Question 3 What should be the Strategic Objectives for the next Local Plan?

See attached statement.
Question 4
Are there any other policies in the Local Plan that you think should be
updated?
(please select one answer)
Yes A
No

See attached statement	
Overtion 5	
Question 5 Are there any other new policies that you think the next Local Plan	should
include?	
(please select one answer)	
Yes	
res	
A/-	
No	
Discourse of the control of the cont	_
Please specify what the new policy should seek to address and wh	ıy.
See attached statement.	

Please specify which policy and how it should be updated.

Question 6

What other evidence should the Council consider to inform the next Local Plan?

See attached statement.	
See attached statement.	
Question 7 & 8 Do you have any site suggestions for housing	ng and / or employment?
If you would like to suggest several sites, pleas one.	e submit a separate form for each
What is your interest in the site? (please select all that apply)	
Owner of the site	Υ
Parish / Town Council	
Local resident	
Amenity / Community Group	
Planning Consultant	

Land Agent	
Developer	
Other	
Other (please specify)	
Are you the sole or part owner of the site? (please select one answer)	
Sole Owner	Υ
Part Owner	
Neither	
If you are not the landowner or the site is in multiple ow the name, address and contact details of the land owner provided	
If not the landowner, I confirm that the landowner/s have site submission (please select one answer)	e been informed of this
Yes	

No	
Does the owner(s) support the development of the site? (please select one answer)	
Yes	
No	
Site location (including grid reference and postcode if known)	
Proposed extension to the settlement boundary to include land at Manchester Road, Chapel-en-le-Frith (grid reference SK 03173 80004)	
Site Area (hectares)	
n/a	
Current Land Use(s) e.g. agriculture, employment, unused/vacant etc.	
See supporting statement.	
Type of site e.g. greenfield, previously developed land/brownfield	
See supporting statement.	

Please provide a site plan clearly identifying the exact boundaries of the site.

See attached statement.	
Proposed Future Uses & Potential Site Capacity (please (please select all that apply) Housing	se specify)
Employment	
Mixed-use (please specify uses)	
Self-build & custom-build housing	
Basic Capacity Information – area/number of dwelling units/proposed floorspace	s/number of
See attached statement	
Market interest - please choose the most appropriate indicate what level of market interest there is/has receiplease select all that apply)	
Site is owned by a developer	
Site is under option to a developer	
Enquiries received/ strong interest	
Site is currently being marketed	

None	
Not Known	Υ
Comments on market interest	
Utilities - Please tell us which of the following u (please select all that apply)	itilities are available to the site
Mains water supply	Υ
Mains sewerage	Y
Electric supply	Υ
Gas supply	Υ
Public highway	Υ
Landline telephone/broadband internet	Y
Public Transport	Υ
Other (please specify)	

Utilities – comments	
Constraints - Please tell us which of the following constraint the site (please select all that apply)	ts are applicable to
Land in other ownership must be acquired to enable the site to b	e developed
Restrictive covenants exist	n
Current land use(s) need to be relocated	n
Physical constraints (topography, trees, other)	n
Flood Risk	n
Infrastructure required	n
Public rights of way cross or adjoin the site	У
Land contamination	n
Access constraints	n
Environmental constraints	n

Please provide any relevant information of likely measures to overcome the above constraints

See attached statement.	
Timescales - Please indicate the approximate become available for development (please select one answer)	ate timescale for when the site will
Immediately	
Up to 5 years	У
5 - 10 years	
10 – 15 years	
Beyond 15 years	
Unknown	

n/a	
other Releva	nt Information – Please use the space below for additional
See attached st	atement.
Question 9	
Oo you have	any site suggestions for Local Green Spaces?
f you would lil one.	ke to suggest several sites, please submit a separate form for each
Site location	(including grid reference and postcode if known)
n/a	

Timescales comments – particularly if you have indicated that the site is not

Please provide a site plan clearly identifying the exact boundaries of the site.					
Location - Is the	site in reasonal	bly close pro	ximity to the o	community it	serves?

Local Significance - Is the site demonstrably special to a local community and holds a particular local significance, e.g. due to its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife?

Size / Scale - Is the site local in character and not an exte	nsive tract of land?
Olze / Ocale - 15 the Site local in character and not an exte	iisive tract or land:
If possible, please provide photographs of the site that so	innort vour
	apport your
comments.	

Question 10

Do you have any site suggestions for ecological improvements?

If you would like to suggest several : one.	sites, please submit a separate form for each
Site location (including grid refere	ence and postcode if known)
n/a	
Please provide a site plan clearly	identifying the exact boundaries of the site
Do you own the site? (please select one answer)	
Yes (full ownership)	
Yes (part ownership)	
No	
Please specify if you also own/co	ntrol adjacent land.

y prevent
ıntil when.
ng issues,

Question 11 Do you have any site suggestions for renewable energy?

If you would like to suggest several sites, please submit a separate form for each one.

one. Site location (including grid reference and postcode if known) n/a Please provide a site plan clearly identifying the exact boundaries of the site. Please specify the proposed type and scale of energy development (Capacity (MW), Height to tip (m), Height to hub (m)) Do you own the site? (please select one answer) Yes (full ownership) Yes (part ownership) No

How can the site be accessed? Are there any restrictions that may prevent access e.g. third party ownership?
Please specify known designations (ecological / environmental / historical) o or around the proposed site
Current land use (including agricultural land quality rating if relevant)
Proposed grid connection point (if known)

Question 12 Do you have any site suggestions for other uses that you think should be included in the Local Plan? What use is the site proposed for? Site location (including grid reference and postcode if known) Please provide a site plan clearly identifying the exact boundaries of the site. Do you own the site? (please select one answer) Yes (full ownership) Yes (part ownership) No

How can the site be accessed? Are there any restrictions that may prevent access e.g. third party ownership?		
Please specify known designations (ecological / environmental / historical) on or around the proposed site		
Current land use		
SignatureEmery Planning		
Date03/03/2023		
Thank you for completing this response form.		





Project: 23-058

Site Address: High Peak Local Plan Representations 2023

Client: P & V Woolley

Date: 1 March 2023

Author: Caroline Payne

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Contents

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2.	Response to Policies	2

Appendices

EP1. Proposed amendment to settlement boundary



1. Introduction

1.1 These representations are submitted on behalf of P & V Woolley to the High Peak Local Plan Early Engagement Consultation. These representations are made specifically in relation to land owned by our client at Manchester Road, Chapel-en-le-Frith and propose a minor amendment to the settlement boundary which would provide a logical rounding of the settlement. They respond to questions 1, 2, 3, 4 and 6 of the Early Engagement Consultation.

2. Response to Policies

Question 1: Do you agree with the Council's initial view of the emerging issues from the new evidence? If not, why?

- 2.1 Our strategic representations made on behalf of a number of clients set out the clear justification for the application of an alternative method to determine local housing need in High Peak and that the housing requirement should be a minimum of 350 dpa in order to:
 - Align with housing requirement in the adopted Local Plan, and would be reflective of completion levels achieved since the current Local Plan was adopted in 2016. Anything less than 350dpa would not represent a 'significant boost' to housing supply.
 - Align the housing requirement with the planned level of economic growth.
 - Ensure that the delivery of affordable housing does not collapse, in the context of the supply
 of affordable housing at present failing to meet affordable housing needs by some margin.
 Any decrease in the supply of affordable housing would represent a significant adverse
 impact.
- 2.2 The Early Consultation document at Table 1 provides a summary of housing completions in the borough from 2011-2022. The table demonstrates the variability in housing completions over this period. It is noted that:
 - Following the adoption of the Local Plan in 2016, there was a clear trend of increased completions which is indicative of increasing market demand and a market which could support a housing requirement above that suggested by the standard method.
 - For the period 2016/17 to 2021/22 (i.e., the period following the adoption of the Local Plan), total completions amount to 2,149 (358dpa). This figure is in excess of local housing need as determined by the standard method (260dpa) and the adopted housing requirement (350dpa).
 - There was a marked decrease in delivery in 2020/21, however this was during the peak of the Covid-19 pandemic which may account for this figure. If the year 2020/21 is removed from the completion data for the last 6 years to account for COVID-19, the average for the period 2016/17 to 2021/22 increases to 380dpa.
- 2.3 Housing in High Peak is currently provided on sites allocated in Policy H2 (and the Chapel-en-le-Frith Neighbourhood Plan) and from small sites which accord with Policy H1. Policy S3 envisages that a total of 1,200 dwellings will be provided on small sites during the existing plan period (2011-2031) which equates to 60 per annum. 100 of these are proposed to be delivered in the Chapel Neighbourhood Plan area.



- 2.4 The extent of windfall development on small sites anticipated in the Local Plan has proven to be overoptimistic, and Policy H1 of the Local Plan has delivered very little in terms of windfall sites beyond the existing settlement boundaries. Furthermore, several sites have been subject to extremely lengthy planning application processes, with planning applications often taking more than 12 months before determination (and sometimes considerably longer).
- 2.5 We consider that the settlement boundaries of the main towns and villages should be reviewed and adjusted where appropriate in order to (a) better reflect the pattern of development on the ground (b) provide a logical rounding off of the settlement with clear defensible boundaries and (c) and to ensure the delivery of small windfall sites alongside the housing allocations.
- 2.6 In the case of Chapel-en-le-Frith, we propose a minor amendment to the existing settlement boundary along Manchester Road to the south east of the settlement as shown on the plan attached at Appendix **EP1** and the extract below:



- 2.7 The proposed amendment would:
 - incorporate the existing pattern of development along the southern side of Manchester Road including Whitestones residential care home and the existing residential properties which lead to the existing settlement boundary.
 - bring the settlement boundary to the south of Manchester Road in line with the established ribbon of development to the north of Manchester Road.
 - maintain a visual break with Cockyard to the east commensurate with the visual break to the north of Manchester Road.
 - Maintain the well treed approach to the town.
- 2.8 Our client's land at Manchester Road, Chapel-en-le-Frith comprises agricultural land situated to the west of the settlement boundary of Chapel-en-le-Frith as shown on the Google Earth extract below:



- 2.9 It is proposed that the eastern field only would be included within the settlement boundary as shown on the plan at **EP1**. This parcel of land adjoins residential development to the north east as which forms part of a ribbon of development leading to the settlement boundary. There is also a strong built-up ribbon of development on the opposite side of Manchester Road which is included within the settlement boundary. A public footpath runs to the west of the site.
- 2.10 The site could accommodate in the order of 4 to 10 dwellings. A low density proposal with a frontage set back from Manchester Road in line with the existing built form would maintain the treed and linear form on approach to the town. The field to the west would remain as open countryside offering the opportunity for biodiversity gain and providing a logical rounding off of the settlement in line with the pattern of development on the northern side of Manchester Road.

Question 2: Should the next Local Plan have a new Spatial Vision? If so, what should it say?

2.11 Yes, to be determined once all background evidence to hand.

Question 3: What should be the Strategic Objectives for the next Local Plan?

2.12 To be determined once all background evidence to hand.

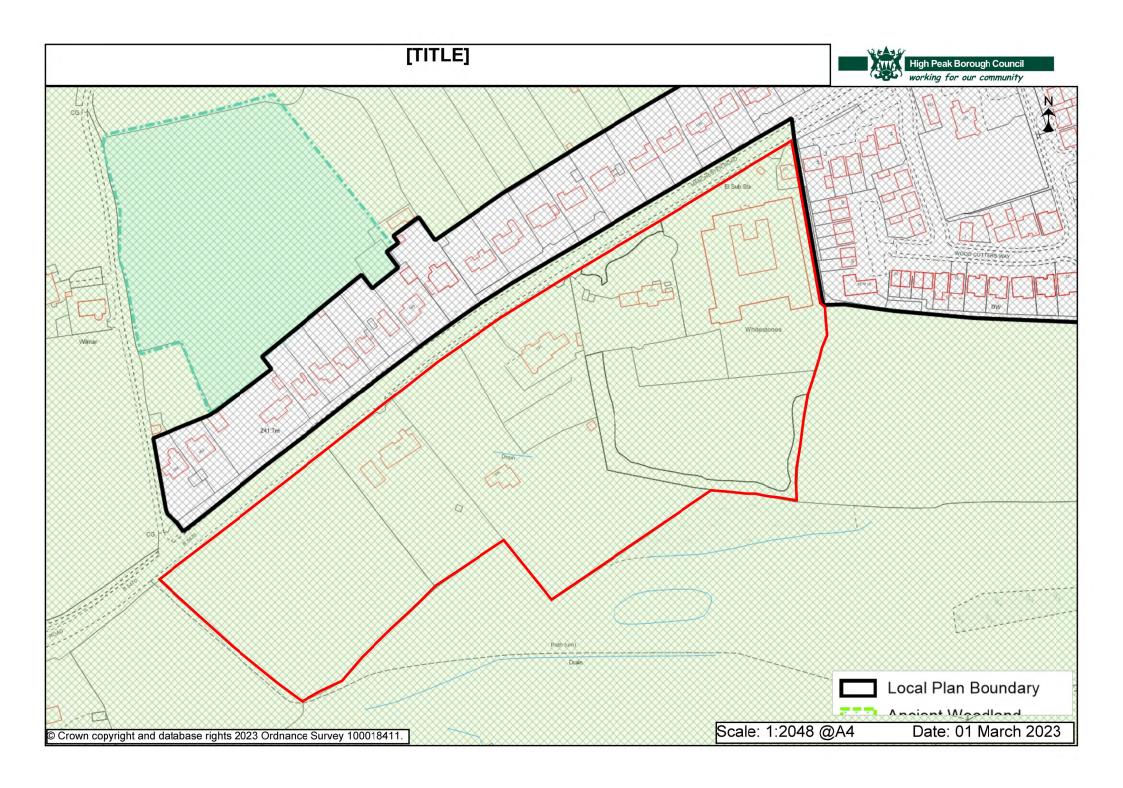
Question 4: Are there any other policies in the Local Plan that you think should be updated? Please specify which policy and how it should be updated.



2.13 The settlement boundaries of the towns and villages identified in Policy S2 should be updated to reflect development on the ground and to provide a logical rounding off of the settlements.

Question 6: What other evidence should the Council consider to inform the next Local Plan?

2.14 Section 3 of the early engagement document, pages 21 to 30 list various reports that are ongoing or will be undertaken in order to inform the next Local Plan. These reports should be finalised prior to the next stage of engagement and made publicly available.









Comment

Consultee Helen Pakpahan (1334883)

Email Address

Address

Event Name High Peak Local Plan - Early Engagement

Comment by Helen Pakpahan (1334883)

Comment ID LPEA58

Response Date 28/02/23 19:44

Consultation Point Question 4 (View)

Status Submitted

Submission Type Web

Version 0.13

Question 1

Do you agree with the Council's initial view of the emerging issues identified from the new evidence?

Question 4

Are there any other policies in the Local Plan that you Yes think should be updated?

Please specify which policy and how it should be updated.

In terms of developer contributions, there is quite a lot of focus on the need for 'new' (school places, infrastructure etc) but nothing on upgrading - it would be more sustainable if some of these contributions (either via CIL, s106 or agreements) could be focused on improving things - ie refurbishing leisure facilities, upgrading pedestrian infrastructure or parks etc.

Yes

Question 5

Are there any other new policies that you think the next Yes Local Plan should include?

Please specify what the new policy should seek to address and why.

Fibre broadband to be supplied to all new builds (so that ready to be connected even if exchange needs upgrading) and minimum levels of mobile phone coverage.

Question 6

What other evidence should the Council consider to inform the next Local Plan?

Access to countryside/ levels of activity - I think it is easy to assume that high peak residents have easy access to green space - but actually I don't feel this is true. Much of the countryside is only accessible to people who can negotiate styles (often poorly maintained and a quadmire for 90% year); livestock and breeding birds restrict access and there are increasing restrictions on parks (for people with dogs). Many of the accessible pathways - like warmbrook in chapel- are disjointed with links removed, and while the canal towpaths provide a great resource - new restrictions on parking at bugsworth make this less accessible. I think some evidence about accessibility (esp for people with mobility issues) needs to be considered in accessment of amenities.

Question 7 & 8

If you would like to suggest several sites, please submit a separate form for each one.

What is your interest in the site? (please tick all that apply)

Proposed Future Uses & Potential Site Capacity (please specify)

Market interest - please choose the most appropriate category below and indicate what level of market interest there is/has recently been in the site.

Utilities - Please tell us which of the following utilities are available to the site (please tick all that apply)

Constraints - Please tell us which of the following constraints are applicable to the site (please tick all that apply)



Comment

Consultee Helen Pakpahan (1334883)

Email Address

Address

Event Name High Peak Local Plan - Early Engagement

Comment by Helen Pakpahan (1334883)

Comment ID LPEA57

Response Date 28/02/23 19:52

Consultation Point Question 1 (View)

Status Submitted

Submission Type Web

Version 0.9

Question 1

Do you agree with the Council's initial view of the Yes emerging issues identified from the new evidence?

Question 2

Should the next Local Plan have a new Spatial Vision? Yes

If so, what should it say?

It does concern me that the central three towns are 'lumped' together as though they are a single entity. It causes unnecessary traffic journeys if people continuously have to travel out of their own towns eg. No big 4 or discount supermarket in New mills, no leisure facilities (swimming pool) in Chapel or Whaley. There is almost no easy to use public transport between New mills and other locations (bus route 199 doesn't normally go into town centre or near leisure centre- and train links in chapel and New mills central require time/degree fitness. It just feels like you are looking at these three towns' facilities as a whole and not understanding the barriers to accessing them - so I would like any spacial strategy to take more account of the individual towns rather than seeing them as a single zone.

Question 4

Are there any other policies in the Local Plan that you Yes think should be updated?

Please specify which policy and how it should be updated.

Green belt review- at the moment New Mills and Whaley Bridge are under almost a blanket designation as green belt - and while I understand this is to stop urban sprawl from Stockport- the impact is that it has pushed the majority of new housing into smaller more distant town/village of Chapel and Chinley. In the next period more development needs to be focused on New Mills as it has infrastructure (2 train stations, high school, swimming pool) - this would help vitality of New Mills Town Centre but would also reduce burden on Chapel/Chinley.

Question 7 & 8

If you would like to suggest several sites, please submit a separate form for each one.

What is your interest in the site? (please tick all that apply)

Proposed Future Uses & Potential Site Capacity (please specify)

Market interest - please choose the most appropriate category below and indicate what level of market interest there is/has recently been in the site.

Utilities - Please tell us which of the following utilities are available to the site (please tick all that apply)

Constraints - Please tell us which of the following constraints are applicable to the site (please tick all that apply)



HIGH PEAK LOCAL PLAN EARLY ENGAGEMENT RESPONSE FORM

Responses invited from 19th January 2023 to 5pm on 3rd March 2023

The Local Plan sets out detailed policies and specific proposals for the development and use of land in High Peak (outside of the Peak District National Park). Your feedback will help the Council to identify the issues and options for the Local Plan for consultation later in 2023.

Your Contact Details:

	Personal details	Agent's details (if applicable)
Title	Mr	
Name	Nicholas Parsons	
Job title (if applicable)		
Organisation (if applicable)		
Address		
Post code		
Telephone no.		
Email address		

PLEASE NOTE that responses must be attributable to named individuals or organisations. They will be held by the Council and will be available to view publicly and cannot be treated as confidential. Your contact details will not be published, but your name and organisation (if relevant) will. High Peak Borough Council maintains a database of consultees who wish to be kept informed about the Local Plan. Details of our data protection and Privacy Notice can be found on the council's website at: https://www.highpeak.gov.uk/YourData

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Derbyshire, SK17 6EL

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Question 1

Do you agree with the Council's initial view of the emerging issues identified from the new evidence?

(please select one answer)		
Yes		
No X	Not completely	

If not, why?

Key Issue - Sustainable economic growth through diversification of the local economy

The Council chose a housing target of 7,000 dwellings over the life of the Local Plan, 2011 to 2031, giving a housing requirement figure of 350 pa. This was recognised as being a higher build rate than had previously been achieved. By the time of the Plan's adoption in April 2016, there was already a shortfall of 1,113 homes. Since then, the Council has not achieved a rate of delivery high enough to reduce this shortfall by any significance; the shortfall remained at 1086 on 1st April 2021, equivalent to an additional 109 houses for each of the 10 years of the Plan remaining to give a gross annual requirement of 459.

In the meantime, the Government introduced a standardised housing need for each LPA, intended to be a demanding target to achieve a significant increase in the availability of housing. High Peak's housing need was 254 dwellings pa (2021), and this included an allowance for previous under supply (cf. High Peak's gross annual requirement of 459). National planning policy advises that for local plans more than five years old, housing requirements should default to the Government's housing need figure. This has rescued the Council from an increasingly unachievable plan as the number of years remaining over which to spread the shortfall reduces.

In hindsight, the Council clearly set itself an exceptionally high build rate. The stated justification for this was to promote economic growth. The following was recognised at the start of the Plan period:

- High Peak was "economically lagging" and new business start-ups had been low in comparison to the regional average.
- Many residents in the Plan area (c. 40% of the working age population) commuted outside of the area for higher wage jobs, particularly to the neighbouring conurbation of Manchester, Tameside and Stockport.
- In contrast, many of those residents working locally were employed in low wage sectors.
- The high out of area wages were increasing house prices in the area while the locally employed were being squeezed out of the housing market.

To address this, the Local Plan recognised that a key issue for sustainable economic growth was diversification of the local economy by attracting a range of businesses with high-wage, high-skilled jobs to the area, reducing the level of out-commuting to the surrounding major cities. This was described as a "priority challenge" for the Local Plan and an essential element of the Council's vision for a distinctive high quality rural environment.

The consequences of boosting the supply of housing while failing to attract a new range of businesses to the area would be to further exacerbate the problems identified at the start of the Plan period:

- Locally employed priced out of their own housing market
- Increased supply of housing attracting further in-migration from the neighbouring conurbations.
- Without local high-wage, high skilled jobs, these new households commuting back into the
 conurbation for work leading to yet higher levels of congestion and pollution throughout the
 major road networks.
- In land usage terms, using up the Borough's housing land supply earlier than necessary in a manner which would not be sustainable and did not satisfy local needs.

The Council has delivered 2149 homes since 2016 but it has not been clearly stated what progress the Council has made in diversification of the local economy to higher quality jobs. Although a Local Plan priority, there does not appear to be any specific reporting on the targets the Council set itself in this respect and whether those targets have been met.

Rectifying this omission is particularly important if the Council is now considering the option of continuing with the policy of an amplified housing requirement, in order to better understand if such an option would be desirable.

Shou	stion 2 uld the next Local Plan have a new Spatial Vision? se select one answer)
	x

Question 3 What should be the Strategic Objectives for the next Local Plan?

The spatial vision and strategic objectives should be strengthened to better support the jobs creation needed to ensure a sustainable balance with increased housing development. SO6 to "welcome development that supports the sustainable growth and diversification of the local economy" seems too passive.

Question 6 What other evidence should the Council consider to inform the next Local Plan?

The Council should give due consideration to the proposals to reopen the former Midland Railway through the Peak District ("Peaks & Dales Railway") which is being promoted by the Manchester & East Midlands Rail Action Partnership (MEMRAP).

These proposals would provide:

- Direct links for four of the five market towns in High Peak (Buxton, Chapel-en-le-Frith, Whaley Bridge and New Mills) with both Manchester and the East Midlands (Derby, Nottingham and beyond) via mainline train services
- A new "through" passenger station for Buxton
- New routes for freight especially from High Peak quarries to the East Midlands and further south
- A major solution to the "A6 Corridor" problem reducing road-based freight wagons, car commuter traffic and car-based visitors to the Peak Park travelling through High Peak.
- Improvements to the environment and an aid to achieving net-zero targets.
- An economic uplift along its route including for High Peak.

Our local transport authority, Derbyshire County Council does not support this project. They believe that nothing has changed since the Scott Wilson study in 2004 concluded an inadequate business case for reopening the line. Scott Wilson drew a similar conclusion in its report on the Borders Rail route. This has since been reopened to much acclaim, patronage projections have been exceeded and the route from Edinburgh through to Tweedbank has enjoyed substantial economic benefits, enabling more employment opportunities and attracting significant investment.

The Peaks & Dales Railway project has funding from private investors once planning permission has been achieved through the National Infrastructure Planning process.

These proposals may be one of the best opportunities for High Peak to grow its economy sustainably.

Signature	Sent by email
Date	02-Mar-2023



Comment

Consultee John Pasiecznik (1334412)

Email Address

Address

Event Name High Peak Local Plan - Early Engagement

Comment by John Pasiecznik (1334412)

Comment ID LPEA39

Response Date 21/02/23 10:24

Consultation Point Question 9 (View)

Status Submitted

Submission Type Web

Version 0.5

Question 7 & 8

If you would like to suggest several sites, please submit a separate form for each one.

What is your interest in the site? (please tick all that apply)

Proposed Future Uses & Potential Site Capacity (please specify)

Market interest - please choose the most appropriate category below and indicate what level of market interest there is/has recently been in the site.

Utilities - Please tell us which of the following utilities are available to the site (please tick all that apply)

Constraints - Please tell us which of the following constraints are applicable to the site (please tick all that apply)

Question 9

If you would like to suggest several sites, please submit a separate form for each one.

Site location (including grid reference and postcode if known)

I am nominating Roughfields as a crucial LOCAL GREEN SPACE, free from any development.

It is between Hadfield and Padfield, off Padfield Main Road

Location - Is the site in reasonably close proximity to the community it serves?

Yes, Roughfields is a crucial green lung between Padfield and Hadfield, and is used by all generations for a multitude of activities.

Local Significance - Is the site demonstrably special to a local community and holds a particular local significance, e.g. due to its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife?

Roughfields is absolutely vital as a LOCAL GREEN SPACE - it's the last public open space between Hadfield and Padfield. It must be retained as a green space.

Size / Scale - Is the site local in character and not an extensive tract of land?

It is a local plece of land, but also frequented by hikers and cyclists from all over the UK.



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Your Contact Details:

	Personal details	Agent's details (if applicable)
Title		
Name	Adele Metcalfe	
Job title (if applicable)	Policy and Communities Team Manager	
Organisation (if applicable)	Peak District National Park Authority	
Address		
Post code		
Telephone no.		
Email address		

PLEASE NOTE that responses must be attributable to named individuals or organisations. They will be held by the Council and will be available to view publicly and cannot be treated as confidential. Your contact details will not be published, but your name and organisation (if relevant) will. High Peak Borough Council maintains a database of consultees who wish to be kept informed about the Local Plan. Details of our data protection and Privacy Notice can be found on the council's website at: https://www.highpeak.gov.uk/YourData

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Derbyshire, SK17 6EL

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Question 1 Do you agree with the Council's initial view of the emerging issues identified from the new evidence? (please select one answer)
Yes x No
If not, why?
Question 2 Should the next Local Plan have a new Spatial Vision? (please select one answer) Yes No
If so, what should it say?
a. A clearer and stronger reference to the biodiversity and climate emergencies, both to reference the issues and set out the role of planning policy to address them.
b. Enhanced reference to the quality of the landscape, and the flow of this landscape across the 'artificial' boundary of the Peak District National Park, which has the highest status of protection.c. Emphasise the importance of the connection of people to nature and to green spaces,

Question 3 What should be the Strategic Objectives for the next Local Plan?

The strategic objectives could contain a direct reference to protecting and enhancing the valued landscapes that are the setting of the Peak District National Park.
Question 4
Are there any other policies in the Local Plan that you think should be updated?
(please select one answer) Yes
765 X
No

Please specify which policy and how it should be updated.

Question 5 Are there any other new policies that you think the next Local Plan should include? (please select one answer)	d
Yes	
No	
Please specify what the new policy should seek to address and why.	

Question 6

What other evidence should the Council consider to inform the next Local Plan?

The new local plan could consider evidence from the A57 link road of predicted increase in traffic in Glossop and onward into the Peak Di			
Question 7 & 8 Do you have any site suggestions for housing and / or employment?			
If you would like to suggest several sites, please submit a separate form for each one.			
What is your interest in the site? (please select all that apply)			
Owner of the site			
Parish / Town Council			
Local resident			
Amenity / Community Group			
Planning Consultant			

Land Agent	
Developer	
Other	
Other (please specify)	
Are you the sole or part owner of the site? (please select one answer)	
Sole Owner	
Part Owner	
Neither	
If you are not the landowner or the site is in multiple own the name, address and contact details of the land owner provided	
If not the landowner, I confirm that the landowner/s have site submission (please select one answer)	been informed of this
Yes	

No	
Does the owner(s) support the development of the site? (please select one answer)	
Yes	
No	
Site location (including grid reference and postcode if known)	
Site Area (hectares)	
Current Land Use(s) e.g. agriculture, employment, unused/vacar	nt etc.
Type of site e.g. greenfield, previously developed land/brownfiel	d

Please provide a site plan clearly identifying the exact boundaries of the site.		
Proposed Future Uses & Potential Site Capacity (please (please select all that apply)	e specify)	
Housing		
Employment		
Mixed-use (please specify uses)		
Self-build & custom-build housing		
Basic Capacity Information – area/number of dwellings/units/proposed floorspace	number of	
Market interest - please choose the most appropriate ca indicate what level of market interest there is/has recen (please select all that apply)	O D	
Site is owned by a developer		
Site is under option to a developer		
Enquiries received/ strong interest		
Site is currently being marketed		

None	
Not Known	
Comments on market interest	
Utilities - Please tell us which of the following utilities are a (please select all that apply)	available to the site
Mains water supply	
Mains sewerage	
Electric supply	
Gas supply	
Public highway	
Landline telephone/broadband internet	
Public Transport	
Other (please specify)	

Utilities – comments	
Constraints - Please tell us which of the following constraints are the site (please select all that apply)	applicable to
Land in other ownership must be acquired to enable the site to be deve	eloped
Restrictive covenants exist	
Current land use(s) need to be relocated	
Physical constraints (topography, trees, other)	
Flood Risk	
Infrastructure required	
Public rights of way cross or adjoin the site	
Land contamination	
Access constraints	

Environmental constraints

Please provide any relevant information of likely measures above constraints	to overcome the
Timescales - Please indicate the approximate timescale fo become available for development (please select one answer)	r when the site will
Immediately	
Up to 5 years	
5 - 10 years	
10 – 15 years	
Beyond 15 years	
Unknown	

Timescales comments – particularly if you have indicated that the site is not immediately available, please explain why
Other Relevant Information – Please use the space below for additional information
Question 9
Do you have any site suggestions for Local Green Spaces?
If you would like to suggest several sites, please submit a separate form for each one.
Site location (including grid reference and postcode if known)

Please provide a site plan clearly identifying the exact boundaries of the site.				
Location - Is the	site in reasonably	close proximit	ty to the commun	ity it serves?

Local Significance - Is the site demonstrably special to a local community and holds a particular local significance, e.g. due to its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife?

Size / Scale - Is the site local in character and not an exte	nsive tract of land?
Olze / Ocale - 15 the Site local in character and not an exte	iisive tract or land:
If possible, please provide photographs of the site that so	innort vour
	apport your
comments.	

Question 10

Do you have any site suggestions for ecological improvements?

If you would like to suggest several sites, please submit a separate form for each

one.	, ,	,	
Site location (including grid ı	reference and po	stcode if known))
Please provide a site plan cle	early identifying t	he exact bounda	aries of the site
Do you own the site? (please select one answer)			
Yes (full ownership)			
Yes (part ownership)			
No			
Please specify if you also ow	vn/control adjace	nt land.	<u></u>

ay prevent
until when.
ing issues,

Question 11 Do you have any site suggestions for renewable energy?

If you would like to suggest several sites, please submit a separate form for each one.

one.	
Site location (including grid reference and postcode i	f known)
Please provide a site plan clearly identifying the exac	t boundaries of the site.
Please specify the proposed type and scale of energy (MW), Height to tip (m), Height to hub (m))	development (Capacity
Do you own the site? (please select one answer)	
Yes (full ownership)	
Yes (part ownership)	
No	

How can the site be accessed? Are there any restrictions that may prevent access e.g. third party ownership?	
Please specify known designations (ecological / environmental / historical) or around the proposed site	'n
Current land use (including agricultural land quality rating if relevant)	
Proposed grid connection point (if known)	

Question 12 Do you have any site suggestions for other uses that you think should be included in the Local Plan? What use is the site proposed for? Site location (including grid reference and postcode if known) Please provide a site plan clearly identifying the exact boundaries of the site. Do you own the site? (please select one answer) Yes (full ownership) Yes (part ownership) No

How can the site be accessed? Are there any restrictions that may prevent access e.g. third party ownership?		
Please specify known designations (ecological / environmental / historical) or around the proposed site	1	
Current land use		
Signature		
Date 6 th February 2023		
Thank you for completing this response form.		

3rd March 2023

Planning Policy High Peak Borough Council Town Hall Buxton Derbyshire **SK17 6EL** (sent by email to: ldf@highpeak.gov.uk)



RE: High Peak Local Plan Early Engagement Response

Dear Sir/Madam,

Having reviewed the Early Engagement Document, we at Planning & Design Practice have constructed the following response to help the Council to identify the key issues and options to cover the period to 2041 for the Local Plan Review.

Emerging Issues

We are in agreement with the emerging issues identified within the document which have deemed specific policies relating to housing and employment needs out of date. The changing demographics of the District has altered the need of the population since 2016 when the previous Local Plan was adopted. Also, in order to improve economic growth in the High Peak, more land is required for employment uses.

However, in addition, we believe that connectivity and education should be classed as emerging issues for the Local Plan Review. There is a growing need to improve public transport use within the District and improve the provision of education. This is essential so young people and those of working age can live and work within the District rather than travelling to neighbouring Districts for employment, education and leisure opportunities. Additionally, the growing elderly population require better transport links to ensure they can retain their mobility and travel to locations with better amenities.

As the NPPF is due to be updated later in the year, more policies may be deemed out of date. Furthermore, from November 2023, there are propositions for the implementation of Biodiversity Net Gain for every development which is crucial to implement within the Local Plan.

Spatial Vision

The current spatial vision for the District is adequate if properly implemented. We think it would be beneficial to mention the growing elderly population and the attraction of young people within the Spatial Vision. There is a need for better public transport links, more appropriate housing and more local independent businesses throughout the smaller village to accommodate the elderly population who are less mobile and rely on the provision of local amenities. In regard to younger people, the provision of leisure facilities and improvements in transport and educational opportunities will retain and attract more young people who may currently decide to utilise facilities and travel to

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other neighbouring locations if these aren't available in the High Peak. Therefore, to ensure the younger populations are not lost through the growth of neighbouring economies, such as Manchester and Sheffield, these issues need to be mentioned within the Spatial Vision.

Local Plan Policies

Overall, we strongly agree with the proposed updates to Local Plan (2016) policies S3, S4 and H4 due to their consideration as being out of date. However, we also think Policy S2 regarding the settlement hierarchy should be updated. It has been noted that changes to the settlement boundaries of New Mills and Chapel-en-le-Frith, first-tier Market Towns, will be implemented in the Local Plan. Although this may be positive in focussing housing, employment and service growth to a wider area, it is contrary to Policy S1. Policy S1 seeks to contribute towards the sustainability of communities, in particular "Minimising the need to travel by promoting development in locations where there is access to a broad range of jobs, services and facilities which are accessible by foot, cycle or public transport with minimal reliance on the private car". However, Policy S2 restricts development within smaller villages, only permitting limited development that meets local rural needs, meaning smaller villages cannot develop. Therefore we believe policy S2 should be updated to remove restrictions within smaller villages so more independent, local businesses can thrive within smaller communities.

The Council should ensure they utilise up to date housing land supply statistics, census data and biodiversity requirements, alongside any other changes proposed within the updated NPPF, when identifying key changes to the Local Plan.

Yours faithfully,



Megan Askham BA (Hons) MSc **Graduate Planner**

For and on behalf of Planning & Design Practice Ltd

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Comment

Consultee Mrs Rachel Purchase (1334922)

Email Address

Address

Event Name High Peak Local Plan - Early Engagement

Comment by Mrs Rachel Purchase (1334922)

Comment ID LPEA64

Response Date 01/03/23 12:49

Consultation Point Question 1 (View)

Status Submitted

Submission Type Web

Version 0.37

Question 1

Do you agree with the Council's initial view of the No emerging issues identified from the new evidence?

If not, why?

The issues have been reasonably identified, but there is no evidence to suggest that HPBC has the resources or the expertise to properly handle the issue of biodiversity net gain and there is therefore a strong likelihood that important habitats will continue to be threatened and destroyed with wholly inadequate 'replacements' agreed. The Planning Department has shown virtually no awareness of the causes, implications and effects of the biodiversity crisis and thre is little to suggest that the 30 year responsibility for maintaining sites associated with development will be successfully managed.

Question 2

Should the next Local Plan have a new Spatial Yes Vision?

If so, what should it say?

The Spatial Vision within the Local Plan is important as it talks of green space for recreational use - but not just for its own value for wildlife as well and says that biodiversity in the Borough will be enhanced through habitat creation, restoration and the reconnection of isolated habitats. This is vital if we are to start addressing the biodiversity crisis. It is also good that this will be supported by work that has been commissioned by the Council from Derbyshire Wildlife Trust - the High Peak Plan for Nature. It is

essential that this informs Local Plan policies and site designations in terms of biodiversity enhancements and protection.

Question 3

What should be the Strategic Objectives for the next Local Plan?

Although the current purpose of the Local Plan is: the conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation, there is an imbalance as to how this is implemented, with far greater emphasis given to the built environment, rather than protecting and enhancing the natural environment. There is also insufficient reference to biodiversity. I applaud the two strategic Objectives: SO2: To maintain, enhance and conserve the Borough's distinct landscape characteristics, biodiversity and cultural and historic environment and SO5: To address, mitigate and adapt to the effects of climate change on people, wildlife and places; promoting the safeguarding and prudent sustainable use of natural resources and would like to see these objectives much better implemented in practice.

While the Local Plan's Key Issues and Themes also include: Protecting Peak District Character, managing the impact of development in the National Park and addressing the challenges of climate change - it doesn't mention here biodiversity, habitat protection etc

Question 4

Are there any other policies in the Local Plan that Yes you think should be updated?

Please specify which policy and how it should be updated.

All of the policies relating to house-building and development, making biodiversity an absolute consideration in all planning applications and adopting the guidance from the Wildlife Trusts: Homes for People and Wildlife

https://www.wildlifetrusts.org/sites/default/files/2018-05/homes for people and wildlife Ir - spreads.pdf

Question 7 & 8

If you would like to suggest several sites, please submit a separate form for each one.

What is your interest in the site? (please tick all that apply)

Other (please specify) Resident

Are you the sole or part owner of the site? Neither

Proposed Future Uses & Potential Site Capacity (please specify)

Market interest - please choose the most appropriate category below and indicate what level of market interest there is/has recently been in the site.

Utilities - Please tell us which of the following utilities are available to the site (please tick all that apply)

Constraints - Please tell us which of the following constraints are applicable to the site (please tick all that apply)

Question 9

If you would like to suggest several sites, please submit a separate form for each one.

Site location (including grid reference and postcode if known)

As Buxton Field Club and High Peak Green Network Biodiversity Group we have submitted our list of sites for protection and habitat development around Buxton to DWT for inclusion in the Plan for Nature. The outline list is attached and we are happy to provide more detail if required

Please provide a site plan clearly identifying the Buxton Wildlife Sites.docx exact boundaries of the site.

Location - Is the site in reasonably close proximity to the community it serves?

All sites are within the geographical limits of the town

Local Significance - Is the site demonstrably special to a local community and holds a particular local significance, e.g. due to its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife?

All sites have richness of wildlife, some of which is outlined in the listing attached

Size / Scale - Is the site local in character and not an extensive tract of land?

Some are larger than others with perhaps Waterswallows being the largest.

Question 10

If you would like to suggest several sites, please submit a separate form for each one.

Site location (including grid reference and postcode if known)

Please see all comments for Q9 above as our suggested areas may be better considered under Q10 - the actual questions don't seem to have been included here.

Buxton Wildlife Sites

Name	Central Grid	Current	Main	Important	Notes
	Reference	Designations	Habitats	species	
Waterswallows		Quarry Face	Open Mosaic	Moonwort	Priority
		only SSSI		Lapwing	Habitat
				Orchids	
Cunningdale		SAC	Lowland	Globeflower	Priority
		SSSI	Calcareous	Orchids	Habitat
			Grassland	Brown Argus	
Hogshaw		None	Deciduous	Butterbur	Priority
			Woodland		Habitat
Cowdale		None			
Ferneydale	SK061715	LNR (part)	Lowland	Grass of	Priority
Grassland			Calcareous	Parnassus	Habitats
			Grassland	Orchids	
			Lowland Fen	Common	
			Lowland	Redstart	
			Meadow	Stoat	
Grinlow		SSSI	Deciduous	Orchids	Relic Ancient
Woods			Woodland	Wood	Woodland
				Anemone	areas
Sherbrook			Deciduous	Dipper	Priority
Wood			Woodland		Habitat
Cote Heath	SK058724	None	Deciduous	Wood	Ancient
Wood			Woodland	Anemone	Woodland
				Ramsons	
				Small-leaved	
				Lime	
Sherbrook	SK063722	None	Deciduous	Pale Toadflax	Priority
Lodge and			Woodland	Broad-leaved	Habitats
adjacent			Open Mosaic	Helleborine	
woodland				Dipper	
Lightwood		None	Ponds	Toad	Priority
Reservoir				Orchids	Habitats
				Common	
				Lizard	
				Lousewort	
				Odonata spp	
				Bilberry	
				Bumblebee	
Fields behind	SK058745	None	Neutral	Waxcaps	Priority
Lightwood			Grassland		Habitat
Road			Rush Pasture		
Brook Bottom	SK057711	None	Lowland Dry	Devil's-bit	
			Acid	Scabious	
			Grassland	Marsh	
			Lowland Fen?	Arrowgrass	
Combs Moss			Blanket Bog	Ring Ouzel	
			Upland	Curlew	
			Heathland		

	T	-		F	
The Terrett					
pastures					
north-west to					
Goslin Bar and					
towards Berry					
Clough					
Stanley Moor	SK045711	None	Reedbed	Sphagnum sp	
Reservoir			Sphagnum	Brown Hare	
			Bog	Black Darter	
			Open Mosaic	Lousewort	
			-		
Victory Quarry					
Ashwood Park			Deciduous	Brown Trout	Some Ancient
and adjacent			Woodland	Dipper	Woodland
woodland				White-letter	
				Hairstreak	
Serpentine			Deciduous	Kingfisher	Priority
			Woodland	Brown Trout	Habitat
Corbar Wood		Ancient	Deciduous	Bluebell	Priority
		Woodland	Woodland		Habitat
Gadley Woods			Deciduous		Priority
			Woodland		Habitat
Pavilion			Lake	Kingfisher	Priority
Gardens			Deciduous	Dipper	Habitat
			Woodland		
Grinlow	SK051717		Lowland	Orchids	Priority
Grassland			Calcareous	Grass of	Habitat
			Grassland	Parnassus	
			Lowland	Wall Butterfly	
			Meadow		
Ashwood Dale		Ancient	Deciduous	Bluebell	Ancient
inc Lovers'		Woodland	Woodland	Ramsons	Woodland
Leap			77000	Wood	11000.0
2000				Anemone	
Fields along	SK042731		Rush Pasture	Ragged Robin	
Bishop's Lane			Deciduous	Brown Hare	
'			Woodland		
Dale Road			Lowland	Globeflower	Priority
Grassland			Meadow		Habitat
Woodland by			Deciduous		Priority
Railway			Woodland		Habitat
Station					
The Slopes			Parkland		Priority
		<u> </u>			Habitat
King Sterndale			Wood		Priority
			Pasture?		Habitat
Harpur Hill inc	SK064707		Open Mosaic	Orchids	Priority
Blue Lagoon					Habitat

John Rimmer



Dear Planning Policy Team,

I would like you to consider these comments as part of your early engagement in preparation for the next LDP or a revision of the current one.

Question 3: What should be the Strategic Objectives for the next Local Plan?

To reduce the environmental impact of the LDP – specifically housing and transport.

- Always give priority to building on 'brownfield' sites in preference to 'greenfield'.
- Actively encourage the use of alternative building methods such as 'insulated concrete formwork, ICF', timber frame and other highly insulated, possibly pre-fabricated building methods. Stop allowing builders to use 'block and brick' as their default method because that is what they have always done.
- Look to integrating 'green walls' and 'green roofs' especially on industrial units, factories, supermarkets and large social/communal buildings.
- As gas boilers are being phased out in 2025 reflect this in a requirement to have air source/ground source or water source heating fitted at build stage – and start to retrofit in all publicly owned buildings. Promote the government grant available to increase the minimal uptake.
- Insist electric vehicle charging points are fitted to each and every new build not shared, one each.
- Planning to require all new build properties to be fitted with LED lighting at build stage, and to encourage the use of 'light tunnels' and solar panels.
- Consider 'solar gain' at planning prior to build stage and orient design to take advantage of being south facing.
- All HPBC heavy diesel vehicles to be retro-fitted to hydrogen. Not a massive task, but requires storage facilities (see JCB).
- All HPBC cars and small vans to become electric.
- Work with bus companies to convert to hydrogen or electric.
- Consider something like CopenHill as the future of recycling and waste disposal as an alternative to landfill and a visitor attraction.

https://www.visitcopenhagen.com/copenhagen/planning/copenhill-gdk1088237 https://parametric-architecture.com/copenhill-a-waste-to-energy-plant-with-a-ski-slope/#:~:text=Located%20in%20Amager%20in%20Copenhagen,with%20an%20urban%20recreation%20center. Question 6: What other evidence should the Council consider to inform the next Local Plan?

HPBC should consider the

designation of the former Shepley Mill site on George Street, Glossop as a Local Green Space; and whether this designation had denied Glossop a major regeneration opportunity and should be removed.

The evidence.

The 'particular circumstances' that qualify a piece of land for Local Green Space Designation protection are that:

- 1. The land has to be 'reasonably close to the community it serves'.
- 2. The land has to be 'demonstrably special to a local community'. The land must fulfil one or more of the following criteria:
 - (a) Beauty. This relates to the visual attractiveness of the site, and its contribution to landscape, character and or setting of the settlement. The LGS would need to contribute to local identity, character of the area and a sense of place, and make an important contribution to the physical form and layout of the settlement. It may link up with other open spaces and allow views through or beyond the settlement which are valued locally.
 - o **(b) Historic significance**. The land should provide a setting for, and allow views of, heritage assets or other locally-valued landmarks. It may be necessary to research historic records from the County Archaeologist or National or Local Records Office.
 - o **(c) Recreational value**. It must have local significance for recreation, perhaps through the variety of activities it supports, and be of value to the community.
 - o **(d) Tranquillity**. Some authorities have an existing tranquillity map showing areas that provide an oasis of calm and a space for quiet reflection.
 - (e) Richness of wildlife. This might include the value of its habitat, and priority areas may have been identified by the council. It may require some objective evidence, such as a designation, like a wildlife site or Local Nature Reserve.
- 3. The land needs to be 'local in character, not an extensive tract of land'.

(Open Spaces Society https://www.oss.org.uk/faqs-about-local-green-space-designation/?gclid=EAIaIQobChMI6Yme-vmm QIVy9DtCh3ZnQmIEAAYASAAEgLPJvD BwE)

Dealing with these issues one at a time, but there is overlap:

1. The evidence submitted to the Inspector at the Inquiry prior to adoption of the 2016 local plan suggested that there were many hundreds of people from the Howard Town ward that supported the LGS designation – so 'reasonably close' and possibly 'demonstrably special'.

According to HPBCs own information (HPFOI2019/20-075 Former Shepley Mill site on George Street, Glossop) there were '33 responses from 24 respondents are known to be from Howard Town'. Apart from the attempt at manipulating the numbers by submitting multiple responses, as 4 responses were from the Rimmer family opposing designation, that leaves 20 in support – at least 5 came from the family, 4 from the family, 2 from the Four or five families from the Ward do not really constitute 'the community it serves'; merely a few annoyed neighbours.

Considering that, at the time, Howard Town had 3528 registered voters, and many more either not eligible, or not registered, the 20 inhabitants of the Howard Town Ward that responded in support of the LGS designation represented 0.56% of the electorate (not inhabitants). The Council should consider whether the evidence confirms that there was a significant enough number to support the designation of a LGS?

There was a supporting petition collected and submitted to demonstrate that this part of the former Shepley Mill site was 'demonstrably special to a local community'. The petition contained several hundred signatures. from places as far away as New York, Bulgaria, London, U.S., Berlin, York, Dorset and many more; as HPBC confirms – only 24 submissions came from the Howard Town Ward; all others should have been discounted.

The Queen Camel Neighbourhood Plan – November 2019 suggested a LGS should be a maximum of 800m from the community it serves.

https://www.southsomerset.gov.uk/media/2941/07-qcnp-lgs-paper-v4-1911.pdf

The Open Space Society say 'Some councils have policies relating to LGS and have introduced a maximum distance between the space and the community. For instance, one has stated it must be within 400 metres, another 600 metres of the people it serves'. Gov.uk says 'the site would normally be within easy walking distance of the community served', so 800m, a maximum of half a mile. https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space

The 230 names were used to support the George Street LGS designation. The evidence suggests that these people should not have been classed as 'reasonably close to the community it serves'; the evidence also suggests the collection of these signatures was a numbers game designed to look like massive local support for the George Street LGS designation, but was actually the work of a small pressure group,

1	Christoph er	mottram	
2	Judy	Little Hayfield	
3	Catherine	London	Stop Mr Rimmer from damaging the Woods which has a Tree Presevation Order protecting it and for the public to have access to this Green Space
4	Daniel	Simmondley	Stop this
5	Frank	Simmondley	I am a "born and bred" Glossopian. We have lost far too much of our green space in Glossop, lets keep what bits remain.
6	James	Hadfield	
7	Claire	High Peak	
8	John Michael	NG5	- 1
9	Sarah	Selby	
10	Adam	Hadfield	
11	Alexandra	London	
12	Ben	Hadfield	This wood needs protecting and to have pick nic benches to enjoy the wood
13	Sarah	s18	
14	Jane	Hadfield	
15	Alison	New Mills	
16	Paul	Hadfield	Stop the land thief

17	John Keith	Northwich	
18	david	Rochdale	
19	Rachel	Tintwistle	I grew up around Greoge st, myself and all the kids who lived there, used to play in them woods, we would make dens, paddle in the stream, I have got many happy memories of that place, and it would be such a shame to build on there, let's keep it for our future kids to play on, coz they don't make land anymore.
20	Helen	Derby	
21	Janet	Simmondley	
22	Nicola	-	
23	David	Hadfield	
24	elena	Bulgaria	J 5
25	richard	Bulgaria	(1)
26	David	Hadfield	
27	Kirsty	_	
28	Stefano	Manchester	For my twinee
29	anita	hadfield	T 1 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7
30	georgie	Plymouth	
31	lynda	High Peak	
32	Chris	Manchester	
33	Stephen	York	
34	Louise	BD20	
35	Bryony	Hadfield	
36	Martin	Manchester	
37	Margaret	Marple Bridge	
38	Chris	Cheshire	
39	Andrew	Manchester	I used to play in this area as a kid, and walk along the river, through the woods. It's definitely be a public right of way for a long, long time.
40	Linda Mary	Shropshire	
41	Virginia	U.S	
41	Stephanie	0.3	
42	Clare	Hartlepool	Please save these woods
43	Evie	Hadfield	
44	Rachel	Gloucestershir	
45	Debra	Chapel-en-le-	
46	Colin	frith, Hadfield	
47	Beverley	Hadfield	children need a place to play
47	beverley	Hadrield	children need a place to play Go boys! the man's insane and has nothing better to do
48	Mary	dorset	with his life than to wreck local landscape. He's an embarrassment to the teaching profession.
49	Jackie	Swindon	My grandson lives in this area and it is very important to him
50	Laura	Hadfield	
51	Gareth	Padfield	

52	Deborah	\$26	Woodland is important and necessary to everyone's wellbeing. There are many brownfield sites that can be used for building without removing trees.
53	Stephen	Wa8	This is a beautiful wood for use by the public
54	Tracy	Hollingworth	This is a beddesign thous for use by the poolie
55	Jenny	Manchester	
56	Vicolas	Manchester	
57	Stephen	Poole	
58	joe	bristol	
59	Jilli	hadfield	Green space is for everyone, one person should not be able to claim ownership like this!
60	sue	Hyde	
61	lee	whitfield	i used to play on this bit of land as a kid and don't want it ruining or being built on (to much land in glossop being built on)
62	joanna	sheffield	
63	David	Nottingham	-) =
64	Chloe	4	
			This beautiful land was on my walk to school as a child and it should remain an asset for the many rather than
65	Laura	York	one exploiter of public land.
66	Rhys	Nottingham	Hang in there guys!
67	Steve	Simmondley	
68	Laraine	prestatyn	why is rimmer damaging the woods dosent he know trees give of oxygen 260 lbs of oxygen each year
69	Paula	Manchester	Every tree produces enough oxygen for 8 people
70	john	mottram	
71	Annie	Padfield	
-	Christoph		
72	er She	Hadfield	-
74	janet	hollingworth	
75	Rod	Simmondley	
76	Wayne	-	
77	Julie	-	
78	Susan	Hadfield	
79	jennifer	Hadfied	
80	Howard	Hadfield	
81	Andrew	Tintwistle	Theevsmallcwoods and corpses should be protected
82	Stephanie	Buxton	
83	Sarah	Manchester	
84	Grant	Gr Manchester	
85	Phil	Hadfield	
86	Tracy	Hadfield	
87	Janet	Hadfield	
88	sara	tintwistle	
89	sara	tintwistle	
90	Fay	Sheffield	

91	Travis Joseph	Whitfield,	
92	Richard	Eastwood	
93	Ellen	Nottingham	
33	LIICH	Nottinghamshi	I am a regular visitor to Glossop and stay near the
94	Alison	re	woods
95	Mary	Wales	
96	Katerina	Huddersfield	II a company of the c
97	Diane	Padfield	- <u>1.</u>
98	Neil	Ashbourne	
99	Lynne	Hollingworth	Ti '
100	Scott	Hadfield	
101	Laura	Tintwistle	
102	Susan	Hollingworth	
103	Esther	Milton Keynes	I go to these woods. When I visit this area
104	Mel	NW	
105	Laura	Hadfield	
106	Sian	Barnsley	My family love to go here
107	Deborah	Hadfield	This is our land. Hands off.
108	Nick	Gamesley	Local Councillor for Local People, innit?
109	Jennifer	Hadfield	
110	Miriam	Hartlepool	
111	Lucy	-	T _i i
112	Simon	London	
113	nina	london	
114	nina	-	
115	Claire	Ashbourne	
116	Robert	Hadfield	I hate land grabs by selfish people. These lads are securing the land for the community in general.
117	Linda	Simmondley	
118	Jim	Spain	
119	lan	Hadfield	
120	Michael	Hadfeild	
121	Jane	Woodley	I went to school in Glossop(Blessed Philip Howard) and the area remains close to my heart as we often visit and walk
122	Paul	New Mills	
123	Maggie	Sheffield	
124	Hannah	Hadfield	
477	Anna-		
125	Marie	Gamesley	
126	maureen	Hadfield	
127	Helen	Ely	
128	Victoria	*	
129	Pauline	Broadbottom	people love this wood please preserve and protect it now and for future generations
130	Jean	SIMMONDLEY	
131	Abraham	London	

132	Roya	Hadfield	
133	Terence	Buxton	
134	David	Holmfirth	
135	Lisa Ann	moreton	Keep Glossop green!
136	Jackie	Bolton	
137	Gavin	Simmondley	love the woods
138	Chelsea	Hadfield	Great cause too many little cherub areas like this being built on
139	Julie	Hadfield	
140	Steven	Hollingworth	
141	Andrew	Hancock	Founder member of FoGSW and Applicant for VG126
142	Tracey	Saddleworth	Originally from high peak.
143	Mick	Tintwistle	
144	Joanne	Hadfield	
145	Ingrid	Colchester	
146	Paul	Berlin	
147	Eleanor	Bristol	
148	Jordan	Hollingworth	I work in glossop just around the corner and it would be nice for this space to be open to the public and not harmed by 1 individual and claimed as his own land
149	Aaron	*	
150	Holly		
151	Melanie	Longdendale	
152	Melanie	Hyde	
153	paul	Birch Vale	
154	Guy	london	
155	Sam	Buckinghamshi	
156	Paul	Hazel Grove	
157	Steven	Hyde	We need trees and green spaces preserved now more than ever!!
158	Sarah	Disley	
159	Jason	Padfield	
160	Janice	Yorkshire	
161	Jack	Kent	
162	Kim	Hollingworth	
163	Jean	Tintwistle	
164	Julia Maureen	Simmondley	
100	Graham	Cleanandle	
165	John	Simmondley	
166	Sara	Stockport	
167	Grace	Mottram	
168	Emma		
169	Kay	Manchester	
170	Dave	Orpington	
171	Mike	Glossop	
172	Mike	(Tintwistle)	Just when you thought the human race was edging forward to higher levels of humanity and co-operative endeavor, a cretin like Rimmer comes along to halt our

			progress and remind us that there are still some whose whose lives are predicated upon greed and stupidity
			We must preserve our green spaces for future
173	Marianne	Tintwistle	generations.
174	Russ	Nottingham	
175	Matt	Buxton	
176	Nicole	-	
177	Helen	Cheshire	
178	Hélen	-	
179	David	Whitfield,	The public has enjoyed continuous access to these woods along Glossop Brook, despite the obstructions erected in an attemp to deter use of the path. These obstructions should be removed so that access canbe restored for residents of all mobility abilities.
180	Chris	Hampshire	
181	Catherine	Hadfield,	
182	Rhona	-	1
183	Lindsey	Hadfield	
184	Michaela	Hadfield	
185	Helen	4	
186	Paul	-	
187	Sharon	Hadfield	
188	Dawn	Stafford	
189	Susan	Rugby	
190	Alexandria	New York	love the forests!! fuck people who want to destroy them, why do you want to destroy the very thing that allows you to breathe easy? idiots
191	Rickie	+	
192	Joanne	Hadfield	Good work guys, keep it up.
193	David	Lines	
194	Jonathan	Padfield	Disgrace if this is allowed to happen
195	Jocelyn	London	
196	Rebecca	Hadfield	1
197	Lee	Hadfield	Keep up the good work
198	Loretta	Hadfield	
199	Loretta	-	
200	Sarah	*	d S
201	Iwan	London	
202	Paula	Gamesley	
203	William	+	
204	Carmen	4	
205	Alexandra	4"	
206	Victoria	Stalybridge	
207	Teresa	Tamworth	

208	kirsty	hadfield	This land should be open to the public as it was when I was a child. I had hours of fun on here as a child making send and sitting by the river with my friends. I hoped that my children would be able to do the same until someone fenced it off in the hope of no one questioning it. Open it back to the public.
209	Sean	Padfield	HPBC should look to their own laurels as well. See what I did there?
210	Frank	Nottingham	
211	Matthew	Manchester	
212	Susan	Hadfield	
213	Alex	Broadbottom	
214	Christine	Hadfield	I grew up in George street I remember that land and I don't agree that me rimmer has any claim on this land
215	Zoe	Stone	
216	Helene	Manchester	
217	Patricia	Tintwistle	
218	Dorothy	Hadfield	
219	Mark	Old Glossop	In times past I've taken visitors to the area for story walks in George Street Woods - a delightful setting, and it upsets me to see it now closed to public access.
220	Sophie	Hadfield	
221	debbie	High Peak	
222	sean	hadfield	
223	stephanie	derbyshire	
224	Heather	Mancheter	Born and riased Derbyshire
225	Adam	York	This wood means a lot to my wife and family.
226	Patricia Anne	Simmondley	
227	Tracey	Simmondley	
228	Nicholas	Hadfield	
229	Tracey	Hadfielf	
230	▲ 119		

The Council should consider if the evidence suggests that the original comment submitted by the CPRE opposing the designation of LGS was a more accurate reflection of the situation?

Sent: Tuesday, October 30, 2012 6:18 PM

The site off George Street, proposed for a Local Green Space, should be used for housing development. It is centrally placed, near to the shops and market place and would save the allocation of greenfield land elsewhere. As a neglected brownfield site, it was proposed for housing development in 2002/3. It is now overgrown with trees and has poor access within the site. It does not fulfil the criteria for local green space in NPPF (para 77). There is no evidence that it is demonstrably special to the local community or that it holds particular local significance, 'for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife'.

The Council should consider if the letter below from the council should consider if the letter below from the council should consider if the letter below from the council should consider if the letter below from the council should consider if the letter below from the council should consider if the letter below from the council should consider if the letter below from the council should consider if the letter below from the council should consider if the letter below from the council should consider if the letter below from the council should consider if the letter below from the council should consider if the letter below from the council should consider if the letter below from the council should consider if the letter below from the council should consider it in the council

Dear Mr

I am writing to confirm that my company, the Landbank dealt with HPBC between 2000 and 2007 with a view to developing the site known as Glossop Brook as part of an overall town centre regeneration scheme, and that the land to the west of George Street was an ideal site for the relocation of the new PCT clinic. This land was of unknown ownership and was derelict; there was no sign of public use, just tipping and an off street impromptu car park created by/or at The Old Glove Works. There was never any indication from HPBC to either myself or the Glossop and Tameside Primary Care Trust Team, who jointly attended the meetings, that public access or use was an issue or we would not have spent considerable time working towards acquiring a site though the CPO process. Had HPBC received or known of evidence at that time that the land could fall foul of the village green legislation I am sure it would have been tabled during our meetings.

Yours sincerely



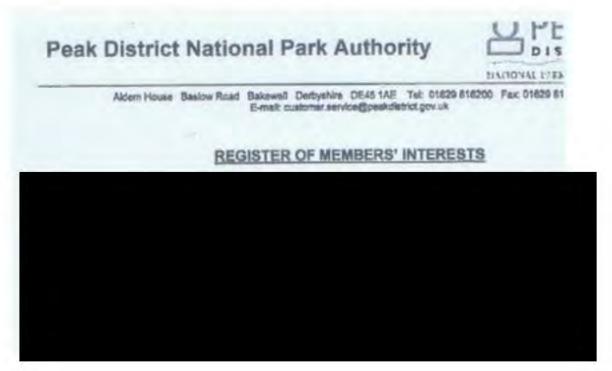
Similarly, should the 'significant benefits to developing this piece of land' (as appreciated by Dai Larner) be ignored.



might have had a conflict of

interest in having the former Shepley Mill site designated a LGS – and whether, for the good of Glossop and the High Peak, this designation needs to be reversed, and the previous 'regeneration area' designation reinstated.





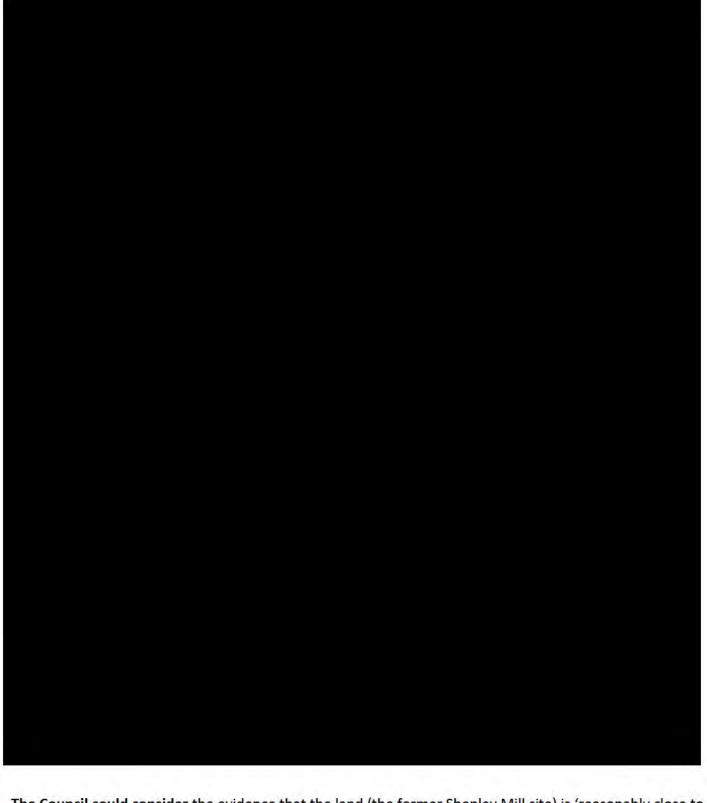
there is no record of how the closed question relating to the former Shepley Mill site was added to the 'consultation' document – then the Council should review this.

The previous name given to the site by locals was 'the tip'. So the Council should also consider how the area shown in the 2010 picture below becomes 'demonstrably special to a local community' – how does it match any criteria?



The Council should consider the possibility that the previous LDP was manipulated. There is no George Street Wood. It is a construct by a group that had a membership of 30.





The Council could consider the evidence that the land (the former Shepley Mill site) is 'reasonably close to the community it serves'. The evidence shows that for many (who filled in an online form) the answer is 'no'.

There were twenty people from five or six houses that fell within the 800m guideline that supported the LGS designation -0.56% of the electorate; but does this constitute a 'community' or a group of activists?

The Council should also consider that:

• In 2011 HPBC were looking to 'bring an abandoned piece of Glossop land' 'that hadn't been touched for decades' 'in from the cold' to turn it into a car park. The area was further described as 'scrub land that has been going to seed for years'.

clinic car park bid



CENTRE POINT: Glossop Primary Care Centre where patients say the parking is poor.

HIGH Peak's Mayor is backing a bid to bring a piece of abandoned Glossop land in from the cold.

Last week we revealed how Tameside and Glossop Primary Care Trust was trying to discover who owns the wooded patch on George Street.

They think it would be perfect to boost the inadequate parking at the nearby Glossop Primary Care Centre.

Mayor Graham Onkley also wants to discover who owns the land.

"I am asking our officers to find out," said the Glossop councillor.

"It would be an ideal addition to any riverside walk, we could put seats on

"It is in a perfect location being so close to Harchills Park"

BY DAVID JONES

The Chronicle has discovered that the land, which is sandwiched between George Street and Philip Howard Road once formed part of Lord Howard's Glossopdale Estate.

It was sold as part of a huge auction which was held at the Norfolk Arms in the mid-1920s.

No one knows who bought the land, or who owns it now.

Part of the wooded plot, which was once the site of a mill, was acquired 50 or more years ago to house Central Methodist Church.

Another chunk was bought to build Glossop Ambulance Station.

But the rest hasn't been touched in decades.

"I would like anyone who knows the owners to get in touch," said Graham.

www.neroysnire.gov.uk

27 JAN 2011

orter and Chronicle Newspapers. Advertising: 0161 304 7691. Editorial: 0161 303 1910 Editorial Glossop: 01457 852669. www.tamesidereporter.co

ystery plot can be bought

SCRUB land that could play a vital part in the success of Glossop Primary Care Centre CAN be bought.

That's the good news following a Chronicle investigation into who owns the George Street mystery plot.

The wooded patch that's opposite the multi-million pound clinic has been going to seed for years.

But in the last few weeks, we have revealed how patients are now pressing for it to be turned into a clinic car park.

And how High Peak Mayor Clir Graham Oakley wants part of it to be spruced up and turned into a river-side amenity area complete with seats. The only snag is no one knows who owns it.

And we still don't.

But High Peak Borough Council has revealed it could be acquired by Compulsory Purchase Order.

A spokesman said: "The council can CPO land where the ownership in question is unknown.

"It simply requires additional procedural steps to be undertaken, for example, to advertise intention to make the order."

We also know that the land was once part of the vast Shepley Mill complex. Glossop Heritage Trust director Mike Brown said: "It was actually the mill pond that was later filled in."

Checks with Derbyshire County Council have revealed that there are no owners listed in the Land Registry.

Tameside and Glossop Primary Care Trust are carrying put their own investigations following a public meeting when old criticised the clinic's acute lack of parking.

Glossop and Hadfield Old Age Pensioners' Association want them to buy the land and provide more parking.

And under CPO act provision, they could do it.

2. The land has to be 'demonstrably special to a local community' because of:

(a) Beauty. It is a brownfield former mill site. Pleasant not beautiful.





- (b) **Historic significance**. None it is part of the same site that the McCarthy and Stone development and the PCT were built on.
- (c) **Recreational value**. As the garden to 33 George Street it is private land with no public access. Gov.uk says 'land could be considered for designation even if there is no public access (eg green areas which are valued because of their wildlife, historic significance and/or beauty)', but none of these apply.
- (d) **Tranquillity**. As the garden to 33 George Street it is private land with no public access.
- (e) **Richness of wildlife.** There is no objective evidence, such as a designation, like a wildlife site or Local Nature Reserve; it is not a SSSI; it does not contain bats, badgers, newts or a pond. It does have a TPO, placed on it by which covers leylandii, ornamental holly, sycamore, willow and many ash suffering from ash die back. No tree is older than 50 years, and generally much younger.

The Council should consider whether the evidence should have supported the original designation.

3. The land needs to be 'local in character, not an extensive tract of land'.

The area is 1.6 acres. Prior to its LGS designation it was recognised as a 'regeneration area'.



HPBCs previous 'Glossop Vision' plan said 'development should complement the brook and park-side setting'.

The Council should consider the phrasing and factual accuracy of the original question in the 2012 High Peak Local Plan Options Consultation document.

'An option for one potential Local Green Space has been identified on land of George Street, Glossop. The site was formerly occupied by a mill building which was destroyed by a fire in 1942. Since this time, the site has gradually returned to nature and is now covered with woodland that is protected by a Tree Preservation Order.'

Central Methodal Church 157 (5) Cessal Methodal Church 157 (5

Potential Local Green Space designation - George Street

Question G 8

Do you support the proposed designation of the land off George Street as a Local Green Space in the new Local Plan?

After noting this is an entirely 'closed question', the Council should consider:

- Who identified on land of George Street, Glossop for one potential Local Green Space?
- Looking at the pictures below, is the statement that the 'site was formerly occupied by a mill building which was destroyed by a fire in 1942', true?
 - The first picture is Shepley Mill in 1954; the second, partial collapse in 1962 on the corner of Chapel Street, now the CMC entrance; the third the derelict site in November 1967 bereft of any trees.







The Council should consider whether the statement given to the public 'is now covered with woodland that is protected by a Tree Preservation Order' was factually accurate.

The pictures below show the elevated section that runs parallel to George Street and were taken in 2010.





Neither this section, or the Old Glove Works car park were *covered with woodland*, but took the opportunity to include the entire site in his TPO 251.

Question 7. Do you have any site suggestions for housing?

Yes. The site of the former Shepley Mill on George Street, Glossop – currently designated LGS. This should have its 'regeneration area' status restored. It is an ideal site for a development similar to the McCarthy and Stone Calico Court and could probably accommodate around 100 retirement units (freeing up family homes).

Alternative uses could be a combined fire, police and ambulance hub – the difference in levels would allow considerable underground parking. Access could be from the river side of the Central Methodist Church joining the current ambulance station to the site; or the CMC could be relocated to the ambulance station site or just be the subject of a CPO.

Combined with the Old Glove Works car park, there is also enough space for a leisure complex, say cinema and ice rink/bowling alley which would be a great asset and remove the need for Glossopian's to travel.

The 2014 HPBC 'LANDSCAPE IMPACT ASSESSMENT' report said 'development along George Street could be used to further increase its significance to the community, encouraging its use as a pedestrian route and open up access to the town centre'. This suggests a row of terraced houses. It is a brownfield site and should be developed.

As HPBC has already discussed the 'proposal to develop' the land in 2020, there appears to be support for this – it is just a matter of deciding upon an appropriate development.

Agenda and draft minutes

<u>George Street Wood, Glossop, The Executive -</u> <u>Individual Executive Decisions - Wednesday, 18th</u> <u>November, 2020 10.00 am</u>

- Agenda frontsheet PDF 82 KB
- Agenda reports pack PDF 97 KB
- Printed draft minutes PDF 90 KB

Items

20/54 George Street Wood, Glossop

View the reasons why item 20/54 is restricted

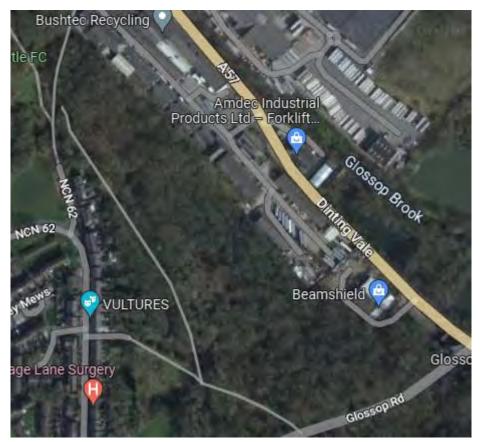
Minutes:

The Executive Councillor approved a report to notify members about a proposal to develop George Street Wood, Glossop and to set out the steps that need to be undertaken in respect of the proposal.

Question 9 Do you have any site suggestions for Local Green Spaces?

Yes. Roughfields, Padfield.

Yes. Bluebell wood, Dinting/Gamesley. It was a nature reserve in the 1970s and is a truly ancient habitat that should be protected. Home to bats, badgers, newts and trees that are more than a century old.



https://www.google.co.uk/maps/@53.4472268,-1.9743637,974m/data=!3m1!1e3?hl=en&authuser=0





Ideally the whole area outlined red and blue would be included – but if this is considered too extensive to qualify then the area outlined red (bounded by Glossop Road and the footpaths) should be considered.

Unlike the George Street LGS, which is a brownfield site previously designated for regeneration, with limited ecological value, Bluebell Wood contains some of the last old woodland in the area, a pond with frogs and newts, bats and many bird species – and it is loved by the locals.





As seen from the A57. Note the long established (60+ years rookery) where more than fifty pairs of birds' nest on a yearly basis.

Name Katia Rimmer Address

Dear Planning Policy Team,

I would like you to consider these comments as part of your early engagement in preparation for the next LDP or a revision of the current one.

Question 3:

What should be the Strategic Objectives for the next Local Plan?

To reduce the environmental impact of the LDP – specifically housing and transport.

- Always give priority to building on 'brownfield' sites in preference to 'greenfield'.
- Actively encourage the use of alternative building methods such as 'insulated concrete formwork, ICF', timber frame and other highly insulated, possibly prefabricated building methods. Stop allowing builders to use 'block and brick' as their default method because that is what they have always done.
- Look to integrating 'green walls' and 'green roofs' especially on industrial units, factories, supermarkets and large social/communal buildings.
- As gas boilers are being phased out in 2025 reflect this in a requirement to have air source/ground source or water source heating fitted at build stage and start to retrofit in all publicly owned buildings. Promote the government grant available to increase the minimal uptake.
- Insist electric vehicle charging points are fitted to each and every new build not shared, one each.
- Planning to require all new build properties to be fitted with LED lighting at build stage, and to encourage the use of 'light tunnels' and solar panels.
- Consider 'solar gain' at planning prior to build stage and orient design to take advantage of being south facing.
- All HPBC heavy diesel vehicles to be retro-fitted to hydrogen. Not a massive task, but requires storage facilities (see JCB).
- All HPBC cars and small vans to become electric.
- Work with bus companies to convert to hydrogen or electric.
- Consider something like CopenHill as the future of recycling and waste disposal as an alternative to landfill and a visitor attraction.

https://www.visitcopenhagen.com/copenhagen/planning/copenhill-gdk1088237 https://parametric-architecture.com/copenhill-a-waste-to-energy-plant-with-a-ski-slope/#:~:text=Located%20in%20Amager%20in%20Copenhagen,with%20an%20urban%20recreation%20center

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https://www.google.co.uk/maps/@53.4472268,-1.9743637,974m/data=!3m1!1e3?hl=en&authuser=0



Dear Planning Policy Team,

I would like you to consider these comments as part of your early engagement in preparation for the next LDP or a revision of the current one.

Firstly, if you hope for 'early engagement' then I do not think you have made it that easy for people to participate. Mostly you are relying on internet access and literacy and access to a pc or laptop – it is not an easy download or read of hundreds of pages on a mobile. Response by email is difficult – because the 11 questions are hidden in the text, as is the email contact; and who wants to go to Buxton Town Hall to read a document prior to responding by letter? A summary would have helped at this initial stage.

Question 3: What should be the Strategic Objectives for the next Local Plan?

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Question 6: What other evidence should the Council consider to inform the next Local Plan?

HPBC should consider the

designation of the former Shepley Mill site on George Street, Glossop as a Local Green Space; and whether this designation had denied Glossop a major regeneration opportunity and should be removed.

The evidence.

The 'particular circumstances' that qualify a piece of land for Local Green Space Designation protection are that:

- 1. The land has to be 'reasonably close to the community it serves'.
- 2. The land has to be 'demonstrably special to a local community'. The land must fulfil one or more of the following criteria:
 - (a) Beauty. This relates to the visual attractiveness of the site, and its contribution to landscape, character and or setting of the settlement. The LGS would need to contribute to local identity, character of the area and a sense of place, and make an important contribution to the physical form and layout of the settlement. It may link up with other open spaces and allow views through or beyond the settlement which are valued locally.
 - o **(b) Historic significance**. The land should provide a setting for, and allow views of, heritage assets or other locally-valued landmarks. It may be necessary to research historic records from the County Archaeologist or National or Local Records Office.
 - o **(c) Recreational value**. It must have local significance for recreation, perhaps through the variety of activities it supports, and be of value to the community.
 - o **(d) Tranquillity**. Some authorities have an existing tranquillity map showing areas that provide an oasis of calm and a space for quiet reflection.
 - (e) Richness of wildlife. This might include the value of its habitat, and priority areas may have been identified by the council. It may require some objective evidence, such as a designation, like a wildlife site or Local Nature Reserve.
- 3. The land needs to be 'local in character, not an extensive tract of land'.

(Open Spaces Society https://www.oss.org.uk/faqs-about-local-green-space-designation/?gclid=EAIaIQobChMI6Yme-vmm QIVy9DtCh3ZnQmIEAAYASAAEgLPJvD BwE)

Dealing with these issues one at a time, but there is overlap:

1. The evidence submitted to the Inspector at the Inquiry prior to adoption of the 2016 local plan suggested that there were many hundreds of people from the Howard Town ward that supported the LGS designation – so 'reasonably close' and possibly 'demonstrably special'.

According to HPBCs own information (HPFOI2019/20-075 Former Shepley Mill site on George Street, Glossop) there were '33 responses from 24 respondents are known to be from Howard Town'. Apart from the attempt at manipulating the numbers by submitting multiple responses, as 4 responses were from the Rimmer family opposing designation, that leaves 20 in support – at least 5 came from the family, 4 from the family, 2 from the Four or five families from the Ward do not really constitute 'the community it serves'; merely a few annoyed neighbours.

Considering that, at the time, Howard Town had 3528 registered voters, and many more either not eligible, or not registered, the 20 inhabitants of the Howard Town Ward that responded in support of the LGS designation represented 0.56% of the electorate (not inhabitants). The Council should consider whether the evidence confirms that there was a significant enough number to support the designation of a LGS?

There was a supporting petition collected and submitted to demonstrate that this part of the former Shepley Mill site was 'demonstrably special to a local community'. The petition contained several hundred signatures. from places as far away as New York, Bulgaria, London, U.S., Berlin, York, Dorset and many more; as HPBC confirms – only 24 submissions came from the Howard Town Ward; all others should have been discounted.

The Queen Camel Neighbourhood Plan – November 2019 suggested a LGS should be a maximum of 800m from the community it serves.

https://www.southsomerset.gov.uk/media/2941/07-qcnp-lgs-paper-v4-1911.pdf

The Open Space Society say 'Some councils have policies relating to LGS and have introduced a maximum distance between the space and the community. For instance, one has stated it must be within 400 metres, another 600 metres of the people it serves'. Gov.uk says 'the site would normally be within easy walking distance of the community served', so 800m, a maximum of half a mile. https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space

The 230 names were used to support the George Street LGS designation. The evidence suggests that these people should not have been classed as 'reasonably close to the community it serves'; the evidence also suggests the collection of these signatures was a numbers game designed to look like massive local support for the George Street LGS designation, but was actually the work of a small pressure group,

1	Christoph er	mottram	
2	Judy	Little Hayfield	
3	Catherine	London	Stop Mr Rimmer from damaging the Woods which has a Tree Presevation Order protecting it and for the public to have access to this Green Space
4	Daniel	Simmondley	Stop this
5	Frank	Simmondley	I am a "born and bred" Glossopian. We have lost far too much of our green space in Glossop, lets keep what bits remain.
6	James	Hadfield	
7	Claire	High Peak	
8	John Michael	NG5	- 1
9	Sarah	Selby	
10	Adam	Hadfield	
11	Alexandra	London	
12	Ben	Hadfield	This wood needs protecting and to have pick nic benches to enjoy the wood
13	Sarah	s18	
14	Jane	Hadfield	
15	Alison	New Mills	
16	Paul	Hadfield	Stop the land thief

17	John Keith	Northwich	
18	david	Rochdale	
19	Rachel	Tintwistle	I grew up around Greoge st, myself and all the kids who lived there, used to play in them woods, we would make dens, paddle in the stream, I have got many happy memories of that place, and it would be such a shame to build on there, let's keep it for our future kids to play on, coz they don't make land anymore.
20	Helen	Derby	
21	Janet	Simmondley	
22	Nicola	-	
23	David	Hadfield	
24	elena	Bulgaria	J 5
25	richard	Bulgaria	(1)
26	David	Hadfield	
27	Kirsty	_	
28	Stefano	Manchester	For my twinee
29	anita	hadfield	T 10 404
30	georgie	Plymouth	
31	lynda	High Peak	
32	Chris	Manchester	
33	Stephen	York	
34	Louise	BD20	
35	Bryony	Hadfield	
36	Martin	Manchester	
37	Margaret	Marple Bridge	
38	Chris	Cheshire	
39	Andrew	Manchester	I used to play in this area as a kid, and walk along the river, through the woods. It's definitely be a public right of way for a long, long time.
40	Linda Mary	Shropshire	
41	Virginia	U.S	
41	Stephanie	0.3	
42	Clare	Hartlepool	Please save these woods
43	Evie	Hadfield	
44	Rachel	Gloucestershir	
45	Debra	Chapel-en-le-	
46	Colin	frith, Hadfield	
47	Beverley	Hadfield	children need a place to play
47	beverley	Hadrield	children need a place to play Go boys! the man's insane and has nothing better to do
48	Mary	dorset	with his life than to wreck local landscape. He's an embarrassment to the teaching profession.
49	Jackie	Swindon	My grandson lives in this area and it is very important to him
50	Laura	Hadfield	
51	Gareth	Padfield	

52	Deborah	\$26	Woodland is important and necessary to everyone's wellbeing. There are many brownfield sites that can be used for building without removing trees.
53	Stephen	Wa8	This is a beautiful wood for use by the public
54	Tracy	Hollingworth	This is a beddesign thous for use by the poole
55	Jenny	Manchester	
56	Vicolas	Manchester	
57	Stephen	Poole	
58	joe	bristol	
59	Jilli	hadfield	Green space is for everyone, one person should not be able to claim ownership like this!
60	sue	Hyde	
61	lee	whitfield	i used to play on this bit of land as a kid and don't want it ruining or being built on (to much land in glossop being built on)
62	joanna	sheffield	
63	David	Nottingham	-) =
64	Chloe	4	
			This beautiful land was on my walk to school as a child and it should remain an asset for the many rather than
65	Laura	York	one exploiter of public land.
66	Rhys	Nottingham	Hang in there guys!
67	Steve	Simmondley	
68	Laraine	prestatyn	why is rimmer damaging the woods dosent he know trees give of oxygen 260 lbs of oxygen each year
69	Paula	Manchester	Every tree produces enough oxygen for 8 people
70	john	mottram	
71	Annie	Padfield	
-	Christoph		
72	er She	Hadfield	-
74	janet	hollingworth	
75	Rod	Simmondley	
76	Wayne	-	
77	Julie	-	
78	Susan	Hadfield	
79	jennifer	Hadfied	
80	Howard	Hadfield	
81	Andrew	Tintwistle	Theevsmallcwoods and corpses should be protected
82	Stephanie	Buxton	
83	Sarah	Manchester	
84	Grant	Gr Manchester	
85	Phil	Hadfield	
86	Tracy	Hadfield	
87	Janet	Hadfield	
88	sara	tintwistle	
89	sara	tintwistle	
90	Fay	Sheffield	

91	Travis Joseph	Whitfield,	
92	Richard	Eastwood	
93	Ellen	Nottingham	
		Nottinghamshi	I am a regular visitor to Glossop and stay near the
94	Alison	re	woods
95	Mary	Wales	
96	Katerina	Huddersfield	
97	Diane	Padfield	
98	Neil	Ashbourne	
99	Lynne	Hollingworth	
100	Scott	Hadfield	1
101	Laura	Tintwistle	
102	Susan	Hollingworth	
103	Esther	Milton Keynes	I go to these woods. When I visit this area
104	Mel	NW	
105	Laura	Hadfield	
106	Sian	Barnsley	My family love to go here
107	Deborah	Hadfield	This is our land. Hands off.
108	Nick	Gamesley	Local Councillor for Local People, innit?
109	Jennifer	Hadfield	
110	Miriam	Hartlepool	
111	Lucy	-	Y c
112	Simon	London	
113	nina	london	
114	nina	-	L C
115	Claire	Ashbourne	
116	Robert	Hadfield	I hate land grabs by selfish people. These lads are securing the land for the community in general.
117	Linda	Simmondley	
118	Jim	Spain	
119	lan	Hadfield	
120	Michael	Hadfeild	
121	Jane	Woodley	I went to school in Glossop(Blessed Philip Howard) and the area remains close to my heart as we often visit and walk
122	Paul	New Mills	
123	Maggie	Sheffield	
124	Hannah	Hadfield	
	Anna-		
125	Marie	Gamesley	
126	maureen	Hadfield	
127	Helen	Ely	
128	Victoria	*	
129	Pauline	Broadbottom	people love this wood please preserve and protect it now and for future generations
130	Jean	SIMMONDLEY	
131	Abraham	London	

132	Roya	Hadfield		
133	Terence	Buxton		
134	David	Holmfirth	1	
135	Lisa Ann	moreton		Keep Glossop green!
136	Jackie	Bolton		
137	Gavin	Simmondley		love the woods
138	Chelsea	Hadfield		Great cause too many little cherub areas like this being built on
139	Julie	Hadfield		
140	Steven	Hollingworth		
141	Andrew	Hancock		Founder member of FoGSW and Applicant for VG126
142	Tracey	Saddleworth		Originally from high peak.
143	Mick	Tintwistle		
144	Joanne	Hadfield		
145	Ingrid	Colchester		
146	Paul	Berlin		
147	Eleanor	Bristol		
148	Jordan	Hollingworth		I work in glossop just around the corner and it would be nice for this space to be open to the public and not harmed by 1 individual and claimed as his own land
149	Aaron	*		
150	Holly	-		
151	Melanie	Longdendale		
152	Melanie	Hyde		
153	paul	Birch Vale		
154	Guy	london		
155	Sam	Buckinghamshi		
156	Paul	Hazel Grove		
157	Steven	Hyde		We need trees and green spaces preserved now more than ever!!
158	Sarah	Disley		
159	Jason	Padfield		
160	Janice	Yorkshire		
161	Jack	Kent		
162	Kim	Hollingworth		
163	Jean	Tintwistle		
164	Julia Maureen	Simmondley		
165	Graham John	Simpondiou		
165		Simmondley		
166	Sara	Stockport		
167	Grace	Mottram		
168	Emma			
169	Kay	Manchester		
170	Dave	Orpington		
171	Mike	Glossop		
172	Mike	(Tintwistle)		Just when you thought the human race was edging forward to higher levels of humanity and co-operative endeavor, a cretin like Rimmer comes along to halt our

			progress and remind us that there are still some whose whose lives are predicated upon greed and stupidity
173	Marianne	Tintwistle	We must preserve our green spaces for future generations.
174	Russ	Nottingham	
175	Matt	Buxton	
176	Nicole	-	
177	Helen	Cheshire	
178	Helen	-	
179	David	Whitfield,	The public has enjoyed continuous access to these woods along Glossop Brook, despite the obstructions erected in an attemp to deter use of the path. These obstructions should be removed so that access canbe restored for residents of all mobility abilities.
180	Chris	Hampshire	
181	Catherine	Hadfield,	
182	Rhona		
183	Lindsey	Hadfield	
184	Michaela	Hadfield	
185	Helen	-	
186	Paul	-	- (
187	Sharon	Hadfield	
188	Dawn	Stafford	
189	Susan	Rugby	
190	Alexandria	New York	love the forests!! fuck people who want to destroy them, why do you want to destroy the very thing that allows you to breathe easy? idiots
191	Rickie	+	
192	Joanne	Hadfield	Good work guys, keep it up.
193	David	Lines	
194	Jonathan	Padfield	Disgrace if this is allowed to happen
195	Jocelyn	London	
196	Rebecca	Hadfield	
197	Lee	Hadfield	Keep up the good work
198	Loretta	Hadfield	
199	Loretta	-	
200	Sarah	2	
201	lwan	London	
202	Paula	Gamesley	
203	William		
204	Carmen	-	
205	Alexandra	*	
206	Victoria	Stalybridge	
207	Teresa	Tamworth	

208	kirsty	hadfield	This land should be open to the public as it was when I was a child. I had hours of fun on here as a child making send and sitting by the river with my friends. I hoped that my children would be able to do the same until someone fenced it off in the hope of no one questioning it. Open it back to the public.
209	Sean	Padfield	HPBC should look to their own laurels as well. See what I did there?
210	Frank	Nottingham	
211	Matthew	Manchester	
212	Susan	Hadfield	
213	Alex	Broadbottom	
214	Christine	Hadfield	I grew up in George street I remember that land and I don't agree that me rimmer has any claim on this land
215	Zoe	Stone	
216	Helene	Manchester	
217	Patricia	Tintwistle	
218	Dorothy	Hadfield	
219	Mark	Old Glossop	In times past I've taken visitors to the area for story walks in George Street Woods - a delightful setting, and it upsets me to see it now closed to public access.
220	Sophie	Hadfield	
221	debbie	High Peak	
222	sean	hadfield	
223	stephanie	derbyshire	
224	Heather	Mancheter	Born and riased Derbyshire
225	Adam	York	This wood means a lot to my wife and family.
226	Patricia Anne	Simmondley	
227	Tracey	Simmondley	
228	Nicholas	Hadfield	
229	Tracey	Hadfielf	
230	A 19		

The Council should consider if the evidence suggests that the original comment submitted by the CPRE opposing the designation of LGS was a more accurate reflection of the situation?

Sent: Tuesday, October 30, 2012 6:18 PM

The site off George Street, proposed for a Local Green Space, should be used for housing development. It is centrally placed, near to the shops and market place and would save the allocation of greenfield land elsewhere. As a neglected brownfield site, it was proposed for housing development in 2002/3. It is now overgrown with trees and has poor access within the site. It does not fulfil the criteria for local green space in NPPF (para 77). There is no evidence that it is demonstrably special to the local community or that it holds particular local significance, 'for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife'.

The Council should consider if the letter below from of Landbank Ltd who worked with HPBC between 2000 and 2007, proposing the development of the site, in any way suggests that the former Shepley Mill site was 'demonstrably special to a local community'?

Dear Mr

I am writing to confirm that my company, the Landbank dealt with HPBC between 2000 and 2007 with a view to developing the site known as Glossop Brook as part of an overall town centre regeneration scheme, and that the land to the west of George Street was an ideal site for the relocation of the new PCT clinic. This land was of unknown ownership and was derelict; there was no sign of public use, just tipping and an off street impromptu car park created by/or at The Old Glove Works. There was never any indication from HPBC to either myself or the Glossop and Tameside Primary Care Trust Team, who jointly attended the meetings, that public access or use was an issue or we would not have spent considerable time working towards acquiring a site though the CPO process. Had HPBC received or known of evidence at that time that the land could fall foul of the village green legislation I am sure it would have been tabled during our meetings.

Yours sincerely



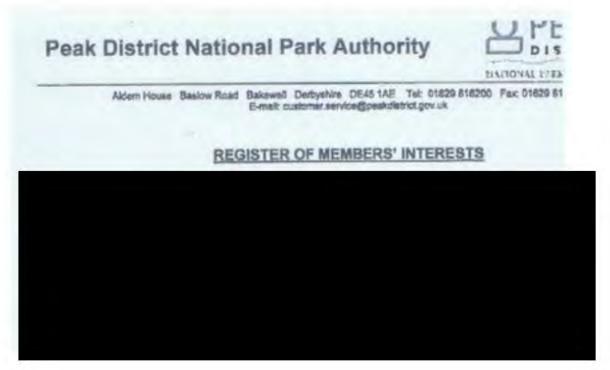
Similarly, should the 'significant benefits to developing this piece of land' (as appreciated by Dai Larner) be ignored.



might have had a conflict of

interest in having the former Shepley Mill site designated a LGS – and whether, for the good of Glossop and the High Peak, this designation needs to be reversed, and the previous 'regeneration area' designation reinstated.





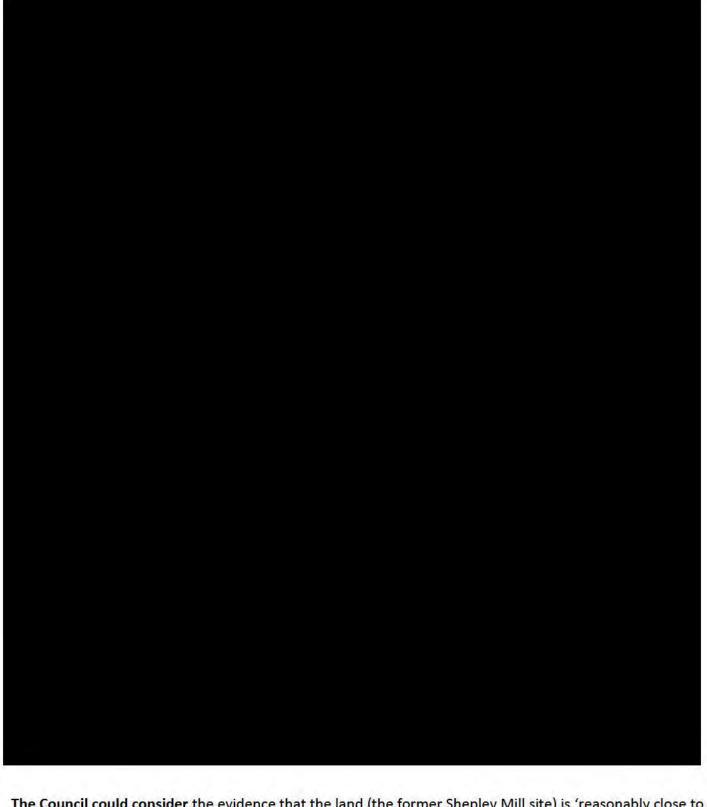
there is no record of how the closed question relating to the former Shepley Mill site was added to the 'consultation' document – then the Council should review this.

The previous name given to the site by locals was 'the tip'. So the Council should also consider how the area shown in the 2010 picture below becomes 'demonstrably special to a local community' – how does it match any criteria?



The Council should consider the possibility that the previous LDP was manipulated. There is no George Street Wood. It is a construct by a group that had a membership of 30.





The Council could consider the evidence that the land (the former Shepley Mill site) is 'reasonably close to the community it serves'. The evidence shows that for many (who filled in an online form) the answer is 'no'.

There were twenty people from five or six houses that fell within the 800m guideline that supported the LGS designation -0.56% of the electorate; but does this constitute a 'community' or a group of activists?

The Council should also consider that:

• In 2011 HPBC were looking to 'bring an abandoned piece of Glossop land' 'that hadn't been touched for decades' 'in from the cold' to turn it into a car park. The area was further described as 'scrub land that has been going to seed for years'.

clinic car park bid



CENTRE POINT: Glossop Primary Care Centre where patients say the parking is poor.

HIGH Peak's Mayor is backing a bid to bring a piece of abandoned Glossop land in from the cold.

Last week we revealed how Tameside and Glossop Primary Care Trust was trying to discover who owns the wooded patch on George Street.

They think it would be perfect to boost the inadequate parking at the nearby Glossop Primary Care Centre.

Mayor Graham Onkley also wants to discover who owns the land.

"I am asking our officers to find out," said the Glossop councillor.

"It would be an ideal addition to any riverside walk, we could put seats on

"It is in a perfect location being so close to Harchills Park"

BY DAVID JONES

The Chronicle has discovered that the land, which is sandwiched between George Street and Philip Howard Road once formed part of Lord Howard's Glossopdale Estate.

It was sold as part of a huge auction which was held at the Norfolk Arms in the mid-1920s.

No one knows who bought the land, or who owns it now.

Part of the wooded plot, which was once the site of a mill, was acquired 50 or more years ago to house Central Methodist Church.

Another chunk was bought to build Glossop Ambulance Station.

But the rest hasn't been touched in decades.

"I would like anyone who knows the owners to get in touch," said Graham.

www.neroysnire.gov.uk

27 JAN 2011

orter and Chronicle Newspapers. Advertising: 0161 304 7691. Editorial: 0161 303 1910 Editorial Glossop: 01457 852669. www.tamesidereporter.co

ystery plot can be bought

SCRUB land that could play a vital part in the success of Glossop Primary Care Centre CAN be bought.

That's the good news following a Chronicle investigation into who owns the George Street mystery plot.

The wooded patch that's opposite the multi-million pound clinic has been going to seed for years.

But in the last few weeks, we have revealed how patients are now pressing for it to be turned into a clinic car park.

And how High Peak Mayor Clir Graham Oakley wants part of it to be spruced up and turned into a river-side amenity area complete with seats. The only snag is no one knows who owns it.

And we still don't.

But High Peak Borough Council has revealed it could be acquired by Compulsory Purchase Order.

A spokesman said: "The council can CPO land where the ownership in question is unknown.

"It simply requires additional procedural steps to be undertaken, for example, to advertise intention to make the order."

We also know that the land was once part of the vast Shepley Mill complex. Glossop Heritage Trust director Mike Brown said: "It was actually the mill pond that was later filled in."

Checks with Derbyshire County Council have revealed that there are no owners listed in the Land Registry.

Tameside and Glossop Primary Care Trust are carrying put their own investigations following a public meeting when old criticised the clinic's acute lack of parking.

Glossop and Hadfield Old Age Pensioners' Association want them to buy the land and provide more parking.

And under CPO act provision, they could do it.

2. The land has to be 'demonstrably special to a local community' because of:

(a) Beauty. It is a brownfield former mill site. Pleasant not beautiful.





- (b) **Historic significance**. None it is part of the same site that the McCarthy and Stone development and the PCT were built on.
- (c) **Recreational value**. As the garden to 33 George Street it is private land with no public access. Gov.uk says 'land could be considered for designation even if there is no public access (eg green areas which are valued because of their wildlife, historic significance and/or beauty)', but none of these apply.
- (d) **Tranquillity**. As the garden to 33 George Street it is private land with no public access.
- (e) **Richness of wildlife.** There is no objective evidence, such as a designation, like a wildlife site or Local Nature Reserve; it is not a SSSI; it does not contain bats, badgers, newts or a pond. It does have a TPO, placed on it by which covers leylandii, ornamental holly, sycamore, willow and many ash suffering from ash die back. No tree is older than 50 years, and generally much younger.

The Council should consider whether the evidence should have supported the original designation.

3. The land needs to be 'local in character, not an extensive tract of land'.

The area is 1.6 acres. Prior to its LGS designation it was recognised as a 'regeneration area'.



HPBCs previous 'Glossop Vision' plan said 'development should complement the brook and park-side setting'.

The Council should consider the phrasing and factual accuracy of the original question in the 2012 High Peak Local Plan Options Consultation document.

'An option for one potential Local Green Space has been identified on land of George Street, Glossop. The site was formerly occupied by a mill building which was destroyed by a fire in 1942. Since this time, the site has gradually returned to nature and is now covered with woodland that is protected by a Tree Preservation Order.'

Central Methodal Church 157 (5) Cessal Methodal Church 157 (5

Potential Local Green Space designation - George Street

Question G 8

Do you support the proposed designation of the land off George Street as a Local Green Space in the new Local Plan?

After noting this is an entirely 'closed question', the Council should consider:

- Who identified on land of George Street, Glossop for one potential Local Green Space?
- Looking at the pictures below, is the statement that the 'site was formerly occupied by a mill building which was destroyed by a fire in 1942', true?
 - The first picture is Shepley Mill in 1954; the second, partial collapse in 1962 on the corner of Chapel Street, now the CMC entrance; the third the derelict site in November 1967 bereft of any trees.







The Council should consider whether the statement given to the public 'is now covered with woodland that is protected by a Tree Preservation Order' was factually accurate.

The pictures below show the elevated section that runs parallel to George Street and were taken in 2010.





Neither this section, or the Old Glove Works car park were *covered with woodland*, but took the opportunity to include the entire site in his TPO 251.

Question 7. Do you have any site suggestions for housing?

Yes. The site of the former Shepley Mill on George Street, Glossop – currently designated LGS. This should have its 'regeneration area' status restored. It is an ideal site for a development similar to the McCarthy and Stone Calico Court and could probably accommodate around 100 retirement units (freeing up family homes).

Alternative uses could be a combined fire, police and ambulance hub – the difference in levels would allow considerable underground parking. Access could be from the river side of the Central Methodist Church joining the current ambulance station to the site; or the CMC could be relocated to the ambulance station site or just be the subject of a CPO.

Combined with the Old Glove Works car park, there is also enough space for a leisure complex, say cinema and ice rink/bowling alley which would be a great asset and remove the need for Glossopian's to travel.

The 2014 HPBC 'LANDSCAPE IMPACT ASSESSMENT' report said 'development along George Street could be used to further increase its significance to the community, encouraging its use as a pedestrian route and open up access to the town centre'. This suggests a row of terraced houses. It is a brownfield site and should be developed.

As HPBC has already discussed the 'proposal to develop' the land in 2020, there appears to be support for this – it is just a matter of deciding upon an appropriate development.

Agenda and draft minutes

<u>George Street Wood, Glossop, The Executive -</u> <u>Individual Executive Decisions - Wednesday, 18th</u> <u>November, 2020 10.00 am</u>

- Agenda frontsheet PDF 82 KB
- Agenda reports pack PDF 97 KB
- Printed draft minutes PDF 90 KB

Items

20/54 George Street Wood, Glossop

View the reasons why item 20/54 is restricted

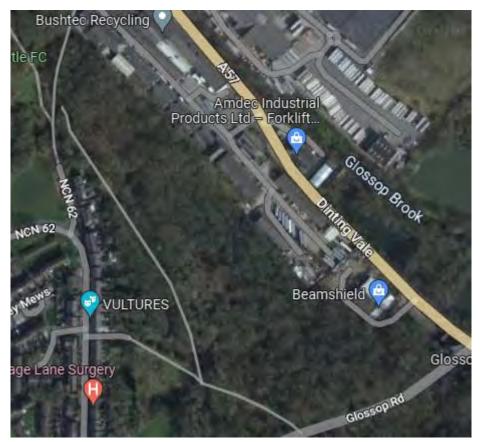
Minutes:

The Executive Councillor approved a report to notify members about a proposal to develop George Street Wood, Glossop and to set out the steps that need to be undertaken in respect of the proposal.

Question 9 Do you have any site suggestions for Local Green Spaces?

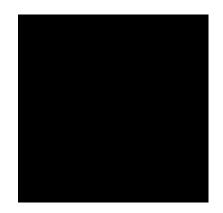
Yes. Roughfields, Padfield.

Yes. Bluebell wood, Dinting/Gamesley. It was a nature reserve in the 1970s and is a truly ancient habitat that should be protected. Home to bats, badgers, newts and trees that are more than a century old.



https://www.google.co.uk/maps/@53.4472268,-1.9743637,974m/data=!3m1!1e3?hl=en&authuser=0





Our Ref:

RB/BT

Your Ref:

3 March 2023

By Email Only: ldf@highpeak.gov.uk

Dear Sir/Madam

Representations in relation to Developer Contributions Supplementary Planning Document and High Peak Local Plan - Early Engagement on behalf of ROCK

These representations are prepared on behalf of ROCK. ROCK has undertaken extensive engagement with High Peak Borough Council in recent years, primarily in relation to Birch Vale Industrial Estate. ROCK owns the estate which is allocated for development in the current High Peak Local Plan under policy DS15 for mixed use development.

These representations however relate to two consultations currently being undertaken. These are:

- 1. Developer Contributions Supplementary Planning Document; and
- 2. High Peak Local Plan Early Engagement

Each is considered in turn below.

Developer Contributions Supplementary Planning Document

ROCK acknowledges the need for development to make contributions where they are necessary to make the development acceptable, and where they are fairly and reasonably related to the development. Such contributions must of course be viable to ensure that the development remains deliverable.

ROCK welcomes that the SPD sets out what is expected by way of contributions and suggests that the SPD should be updated regularly in order to ensure that the document remains relevant and accurate in terms of the requirements it identifies.

ROCK particularly welcomes the inclusion of paragraph 3.12 which states:

3.12 It may however be the case that some developments are not able to viably make contributions towards all of the infrastructure that is required but that the benefits of



development are considered by the Council to outweigh the failure to provide policy compliant obligations. In such cases, where there are viability issues, contributions may be prioritised by the Council, who will seek to achieve a well-balanced package of contributions to best address mitigation. Whilst each case needs to be assessed on its own merits, the general approach that will be taken to prioritise contributions as outlined below:

- Critical on and off-site infrastructure needed to achieve the development of the site (e.g. highways, open space, sewer/drainage, nutrient mitigation).
- On-site affordable housing.
- Contributions for education provision.
- Biodiversity and other green infrastructure, playing pitches /leisure facilities, sustainable transport provision directly serving the site.
- Off-site affordable housing.
- Other infrastructure not specifically required by the Local Plan but reasonably requested by an infrastructure provider / consultee

ROCK fully supports this, in that viability will be carefully considered and, where necessary, obligations will be prioritised as identified above.

ROCK reserves the right to make further submissions in relation to viability and obligations during the progression of the Local Plan Review.

High Peak Local Plan - Early Engagement

ROCK's comments relate specifically to Questions 7 & 8, namely:

- 7. Do you have any site suggestions for housing.
- 8. Do you have any site suggestions for employment.

ROCK wishes to confirm that Birch Vale Industrial Estate, which is allocated for mixed use development in the 2016 Local Plan (Policy DS 15), continues to be a deliverable site. The current occupier has now largely relocated to an alternative site and only a skeleton staff remains. ROCK are in discussions with several potential developers and it is their intention to progress a planning application shortly. You will be aware that detailed discussions have taken in recent years, however these have not progressed to an application, primarily due to the intervention of the pandemic. ROCK expects to reengage in pre-application discussions this year and as such the application remains available, suitable and achievable.



I trust the above is helpful. ROCK looks forward to further engagement with the council as the Local Plan review progresses, but also through pre-application discussions as detailed above.

Kind regards

Yours sincerely

Richard Barton Senior Director

Planning, Development and Regeneration

For and on behalf of Avison Young (UK) Limited



HIGH PEAK LOCAL PLAN EARLY ENGAGEMENT RESPONSE FORM

Responses invited from 19th January 2023 to 5pm on 3rd March 2023

The Local Plan sets out detailed policies and specific proposals for the development and use of land in High Peak (outside of the Peak District National Park). Your feedback will help the Council to identify the issues and options for the Local Plan for consultation later in 2023.

Your Contact Details:

	Personal details	Agent's details (if applicable)
Title		
	Mr	
Name		
	Malcolm Rouse	
Job title (if		
applicable)		
Organisation (if		
applicable)		
Address		
Post code		
Telephone no.		
-		
Email address		

PLEASE NOTE that responses must be attributable to named individuals or organisations. They will be held by the Council and will be available to view publicly and cannot be treated as confidential. Your contact details will not be published, but your name and organisation (if relevant) will. High Peak Borough Council maintains a database of consultees who wish to be kept informed about the Local Plan. Details of our data protection and Privacy Notice can be found on the council's website at: https://www.highpeak.gov.uk/YourData

Please complete and return this form by **5pm** on **3rd March 2023**

by email to: ldf@highpeak.gov.uk; or

by post to: Planning Policy, High Peak Borough Council, Town Hall, Buxton,

Derbyshire, SK17 6EL

Alternatively, you can respond online on the Local Plan consultation website https://highpeak-consult.objective.co.uk/kse.

Question 1 Do you agree with the Council's initial view of the emerging issues identified from the new evidence? (please select one answer)
Yes
No
If not, why?
PLEASE SEE Q3 AND Q9
Question 2 Should the next Local Plan have a new Spatial Vision? (please select one answer)
Yes
If so, what should it say?

Question 3 What should be the Strategic Objectives for the next Local Plan?

Local Infrastructure should be considered prior to considering further housing in the Glossop area i.e. schools / doctor's / dentists / roads to absorb traffic.
NONE of the above appears to have been considered for any new housing located within the Glossop area and beyond, why is this??
Every little handkerchief piece of land in the Glossop area is being built on further grinding down resident quality of life in terms of finding a dentist getting a doctor's appointment etc the roads are gridlocked daily because of volume of traffic.
There is one road in and one road out of Glossop. Commuting to work is a nightmare, if one road is out of action the knock-on effect around the area is appalling.
Housing should be considered locally and not by a council located miles away.
PLEASE SEE Q9.
Question 4
Are there any other policies in the Local Plan that you think should be updated? (please select one answer)
Yes

No

Question 5 Are there any other new policies that you think the next Local Plan should include?
(please select one answer)
Yes
No
Please specify what the new policy should seek to address and why.

Question 6

What other evidence should the Council consider to inform the next Local Plan?

Question 7 & 8 Do you have any site suggestions for housing and / or elements.	mployment?			
If you would like to suggest several sites, please submit a separate form for each one.				
What is your interest in the site? (please select all that apply)				
Owner of the site				
Parish / Town Council				
Local resident				
Amenity / Community Group				
Planning Consultant				

Land Agent	
Developer	
Other	
Other (please specify)	
NONE	
Are you the sole or part owner of the site? (please select one answer)	
Sole Owner	
Part Owner	
Neither	
If you are not the landowner or the site is in multiple own the name, address and contact details of the land owner provided	
If not the landowner, I confirm that the landowner/s have site submission (please select one answer)	been informed of this
Yes	

No	
Does the owner(s) support the development of the site? (please select one answer)	
Yes	
No	
Site location (including grid reference and postcode if known)	
Site Area (hectares)	
Current Land Use(s) e.g. agriculture, employment, unused/vacant etc.	
Type of site e.g. greenfield, previously developed land/brownfiel	d

Please provide a site plan clearly identifying the exact b	ooundaries of the site.
Proposed Future Uses & Potential Site Capacity (please (please select all that apply)	e specify)
Housing	
Employment	
Mixed-use (please specify uses)	
Self-build & custom-build housing	
Basic Capacity Information – area/number of dwellings/units/proposed floorspace	number of
Market interest - please choose the most appropriate ca indicate what level of market interest there is/has recen (please select all that apply)	O D
Site is owned by a developer	
Site is under option to a developer	
Enquiries received/ strong interest	
Site is currently being marketed	

None	
Not Known	
Comments on market interest	
Utilities - Please tell us which of the following utilities are a (please select all that apply)	available to the site
Mains water supply	
Mains sewerage	
Electric supply	
Gas supply	
Public highway	
Landline telephone/broadband internet	
Public Transport	
Other (please specify)	

Utilities – comments	
Constraints - Please tell us which of the following constraints are the site (please select all that apply)	applicable to
Land in other ownership must be acquired to enable the site to be deve	eloped
Restrictive covenants exist	
Current land use(s) need to be relocated	
Physical constraints (topography, trees, other)	
Flood Risk	
Infrastructure required	
Public rights of way cross or adjoin the site	
Land contamination	
Access constraints	

Environmental constraints

Please provide any relevant information of likely measures above constraints	to overcome the
Timescales - Please indicate the approximate timescale fo become available for development (please select one answer)	r when the site will
Immediately	
Up to 5 years	
5 - 10 years	
10 – 15 years	
Beyond 15 years	
Unknown	

Timescales comments – particularly if you have indicated that the site is not immediately available, please explain why
Other Relevant Information – Please use the space below for additional information
Question 9
Do you have any site suggestions for Local Green Spaces?
If you would like to suggest several sites, please submit a separate form for each one.
Site location (including grid reference and postcode if known)
ROUGHFIELDS SK131EJ LOCATED BETWEEN Hadfield and Padfield.

Please pr	ovide a site plan (clearly identif	ying the exact	: boundaries o	f the site.
Please see	attachment				
Location	- Is the site in rea	sonably close	proximity to	the communit	y it serves'
YES					

Local Significance - Is the site demonstrably special to a local community and holds a particular local significance, e.g. due to its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife?

The plot is popular with both residents of Hadfield & Padfield for recreation.

I believe that Rough fields plays a vital role in helping local people maintain our mental and physical wellbeing.

The area is used for dog walking, community gatherings, sports events / football for younger residents, meeting friends and neighbours, picnic area, there is also a designated play area for children with swings and slid etc.

There is a Wishing Tree which is full of ribbons in the hope we can secure this parcel of land for the long term and free from threat of development for the community.

Roughfields sits on the edge of the Peak District.

It's incredibly beautiful, naturally wild, and full of wildlife which is appreciated by the residents and the animals who need a home.

We are lucky enough to have bats and an owl who is heard at night hunting with its mate.

In summer its bursting with wildflowers and long grasses, and some short grass which the council cuts so older people can meander through.

It provides a wonderful quiet breathing space for local people and was especially treasured during lock down and has remained so ever since.

Size / Scale - Is the site local in character and not an extensive tract of land?

Roughfields site is local in character and not is not extensive tract of land The SAVE ROUGHFIELDS support group have submitted an Asset Of The Community Order to keep it this area green and free from the threat of housing development, we are still waiting to hear.

Please see attached
Question 10
Do you have any site suggestions for ecological improvements?
If you would like to suggest several sites, please submit a separate form for each one.
Site location (including grid reference and postcode if known)
Please provide a site plan clearly identifying the exact boundaries of the site
Do you own the site? (please select one answer)
Yes (full ownership)
Yes (part ownership)
No

If possible, please provide photographs of the site that support your

comments.

lease specify	y if you also own/control adjacent land.
	site be accessed? Are there any restrictions that may prevent nird party ownership?
lease specify	y the current land use.
the land is i	n any existing ecological schemes, please specify until when.

Please provide any details of factors affecting the site (e.g. flooding issues, topography, notable species possibly present on site etc.)

Please specify the proposed type and scale (MW), Height to tip (m), Height to hub (m))	of energy development (Capacity
Do you own the site? (please select one answer)	
Yes (full ownership)	
Yes (part ownership)	
No	
How can the site be accessed? Are there an access e.g. third party ownership?	y restrictions that may prevent

Please specify known designations (ecological / environmental / historical) on or around the proposed site

Current land use (including agricultural land quality rating if relevant)
Proposed grid connection point (if known)
Question 12
Do you have any site suggestions for other uses that you think should be included in the Local Plan?
What use is the site proposed for?
• •

Site location (including grid reference and postcode if known)

Please provide a site plan clearly ide	entifying the exact boundaries of the site
o you own the site?	
olease select one answer)	
es (full ownership)	
es (part ownership)	
lo	
low can the site be accessed? Are to cess e.g. third party ownership?	there any restrictions that may prevent

Please specify known designations (ecological / environmental / historical) on or around the proposed site	
Current land use	
SignatureS Rouse	
Date22/02/2023	

Thank you for completing this response form.



HIGH PEAK LOCAL PLAN EARLY ENGAGEMENT RESPONSE FORM

Responses invited from 19th January 2023 to 5pm on 3rd March 2023

The Local Plan sets out detailed policies and specific proposals for the development and use of land in High Peak (outside of the Peak District National Park). Your feedback will help the Council to identify the issues and options for the Local Plan for consultation later in 2023.

Your Contact Details:

	Personal details	Agent's details (if applicable)
Title		
	Mrs	
Name		
	Shula Rouse	
Job title (if		
applicable)		
Organisation (if		
applicable)		
Address		
Post code		
Telephone no.		
•		
Email address		

PLEASE NOTE that responses must be attributable to named individuals or organisations. They will be held by the Council and will be available to view publicly and cannot be treated as confidential. Your contact details will not be published, but your name and organisation (if relevant) will. High Peak Borough Council maintains a database of consultees who wish to be kept informed about the Local Plan. Details of our data protection and Privacy Notice can be found on the council's website at: https://www.highpeak.gov.uk/YourData

Please complete and return this form by **5pm** on **3rd March 2023**

by email to: ldf@highpeak.gov.uk; or

by post to: Planning Policy, High Peak Borough Council, Town Hall, Buxton,

Derbyshire, SK17 6EL

Alternatively, you can respond online on the Local Plan consultation website https://highpeak-consult.objective.co.uk/kse.

Question 1 Do you agree with the Council's initial view of the emerging issues identified from the new evidence? (please select one answer)
Yes
No
If not, why?
PLEASE SEE Q3 AND Q9
Question 2 Should the next Local Plan have a new Spatial Vision? (please select one answer)
Yes
If so, what should it say?

Question 3 What should be the Strategic Objectives for the next Local Plan?

Local Infrastructure should be considered prior to considering further housing in the Glossop area i.e. schools / doctor's / dentists / roads to absorb traffic.
NONE of the above appears to have been considered for any new housing located within the Glossop area and beyond, why is this??
Every little handkerchief piece of land in the Glossop area is being built on further grinding down resident quality of life in terms of finding a dentist getting a doctor's appointment etc the roads are gridlocked daily because of volume of traffic.
There is one road in and one road out of Glossop. Commuting to work is a nightmare, if one road is out of action the knock-on effect around the area is appalling.
Housing should be considered locally and not by a council located miles away.
PLEASE SEE Q9.
Question 4
Are there any other policies in the Local Plan that you think should be updated? (please select one answer)
Yes

No

Question 5 Are there any other new policies that you think the next Local Plan should include?
(please select one answer)
Yes
No
Please specify what the new policy should seek to address and why.

Question 6

What other evidence should the Council consider to inform the next Local Plan?

Question 7 & 8 Do you have any site suggestions for housing and / or employment?		
If you would like to suggest several sites, please submit a se one.	parate form for each	
What is your interest in the site? (please select all that apply)		
Owner of the site		
Parish / Town Council		
Local resident		
Amenity / Community Group		
Planning Consultant		

Land Agent	
Developer	
Other	
Other (please specify)	
NONE	
Are you the sole or part owner of the site? (please select one answer)	
Sole Owner	
Part Owner	
Neither	
If you are not the landowner or the site is in multiple own the name, address and contact details of the land owner provided	
If not the landowner, I confirm that the landowner/s have site submission (please select one answer)	been informed of this
Yes	

No	
Does the owner(s) support the development of the site? (please select one answer)	
Yes	
No	
Site location (including grid reference and postcode if known)	
Site Area (hectares)	
Current Land Use(s) e.g. agriculture, employment, unused/vacant etc.	
Type of site e.g. greenfield, previously developed land/brownfiel	d

Please provide a site plan clearly identifying the exact boundaries of the site.	
Proposed Future Uses & Potential Site Capacity (please (please select all that apply)	e specify)
Housing	
Employment	
Mixed-use (please specify uses)	
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Basic Capacity Information – area/number of dwellings/units/proposed floorspace	number of
Market interest - please choose the most appropriate ca indicate what level of market interest there is/has recen (please select all that apply)	O D
Site is owned by a developer	
Site is under option to a developer	
Enquiries received/ strong interest	
Site is currently being marketed	

None		
Not Known		
Comments on market interest		
Utilities - Please tell us which of the following utilities are available to the site (please select all that apply)		
Mains water supply		
Mains sewerage		
Electric supply		
Gas supply		
Public highway		
Landline telephone/broadband internet		
Public Transport		
Other (please specify)		

Utilities – comments	
Constraints - Please tell us which of the following constraints are the site (please select all that apply)	applicable to
Land in other ownership must be acquired to enable the site to be deve	eloped
Restrictive covenants exist	
Current land use(s) need to be relocated	
Physical constraints (topography, trees, other)	
Flood Risk	
Infrastructure required	
Public rights of way cross or adjoin the site	
Land contamination	
Access constraints	

Environmental constraints

Please provide any relevant information of likely measures above constraints	to overcome the
Timescales - Please indicate the approximate timescale fo become available for development (please select one answer)	r when the site will
Immediately	
Up to 5 years	
5 - 10 years	
10 – 15 years	
Beyond 15 years	
Unknown	

Timescales comments – particularly if you have indicated that the site is not immediately available, please explain why
Other Relevant Information – Please use the space below for additional information
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Site location (including grid reference and postcode if known)
ROUGHFIELDS SK131EJ LOCATED BETWEEN Hadfield and Padfield.

Please p	provide a site plan	clearly ident	ifying the ex	act boundari	es of the site.
Please se	ee attachment				
Location	า - Is the site in rea	asonably clos	se proximity	to the comm	unity it serves'
YES					

Local Significance - Is the site demonstrably special to a local community and holds a particular local significance, e.g. due to its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife?

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Please see attached
Question 10
Do you have any site suggestions for ecological improvements?
If you would like to suggest several sites, please submit a separate form for each one.
Site location (including grid reference and postcode if known)
Please provide a site plan clearly identifying the exact boundaries of the site
Do you own the site? (please select one answer)
Yes (full ownership)
Yes (part ownership)
No

If possible, please provide photographs of the site that support your

comments.

lease spec	ify if you also own/control adjacent land.
	e site be accessed? Are there any restrictions that may prevent third party ownership?
lease spec	ify the current land use.
the land is	in any existing ecological schemes, please specify until when

Please provide any details of factors affecting the site (e.g. flooding issues, topography, notable species possibly present on site etc.)

Question 11 Do you have any site suggestions for renewable energy?
If you would like to suggest several sites, please submit a separate form for each one.
Site location (including grid reference and postcode if known)
Please provide a site plan clearly identifying the exact boundaries of the site.
Please provide a site plan clearly identifying the exact boundaries of the site.
Please provide a site plan clearly identifying the exact boundaries of the site.

Please specify the proposed type and scale (MW), Height to tip (m), Height to hub (m))	of energy development (Capacity
Do you own the site? (please select one answer)	
Yes (full ownership)	
Yes (part ownership)	
No	
How can the site be accessed? Are there an access e.g. third party ownership?	y restrictions that may prevent

Please specify known designations (ecological / environmental / historical) on or around the proposed site

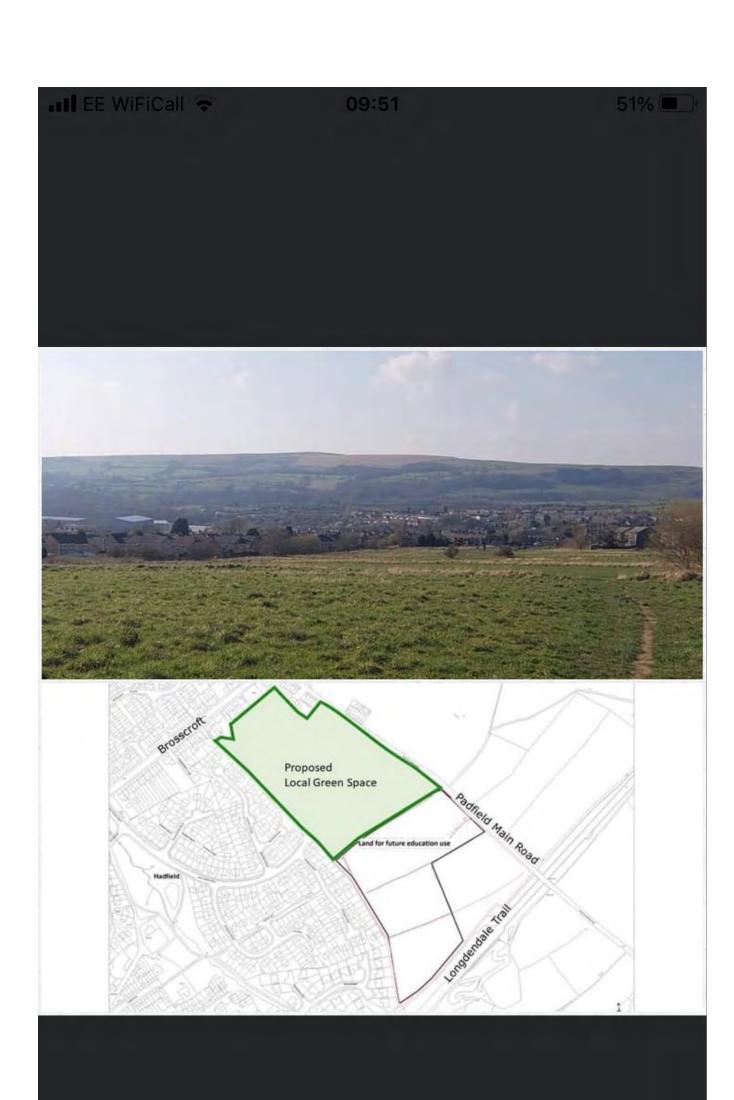
Current land use (including agricultural land quality rating if relevant)
Proposed grid connection point (if known)
Question 12 Do you have any site suggestions for other uses that you think should be included in the Local Plan?
IIICIUUGU III IIIG EUCAI FIAII :
What use is the site proposed for?

Site location (including grid reference and postcode if known)

lease provide a site plan clearly i	dentifying the exact boundaries of the si	te.
o you own the site?		
please select one answer)		
es (full ownership)		
es (part ownership)		
lo		
low can the site be accessed? Are cess e.g. third party ownership?	e there any restrictions that may prevent	•

Please specify known designations (ecological / environmental / historical) or or around the proposed site
Current land use
SignatureS Rouse
Date22/02/2023

Thank you for completing this response form.





HIGH PEAK LOCAL PLAN EARLY ENGAGEMENT RESPONSE FORM

Responses invited from 19th January 2023 to 5pm on 3rd March 2023

The Local Plan sets out detailed policies and specific proposals for the development and use of land in High Peak (outside of the Peak District National Park). Your feedback will help the Council to identify the issues and options for the Local Plan for consultation later in 2023.

Your Contact Details:

	Personal details	Agent's details (if applicable)
Title		
Name		
Job title (if applicable)		
Organisation (if applicable)	The Shuker Partnership	Emery Planning Partnership
Address	c/o agent	
Post code		
Telephone no.		
Email address		

PLEASE NOTE that responses must be attributable to named individuals or organisations. They will be held by the Council and will be available to view publicly and cannot be treated as confidential. Your contact details will not be published, but your name and organisation (if relevant) will. High Peak Borough Council maintains a database of consultees who wish to be kept informed about the Local Plan. Details of our data protection and Privacy Notice can be found on the council's website at: https://www.highpeak.gov.uk/YourData

Please complete and return this form by **5pm** on **3rd March 2023**

by email to: ldf@highpeak.gov.uk; or

by post to: Planning Policy, High Peak Borough Council, Town Hall, Buxton,

Derbyshire, SK17 6EL

Alternatively, you can respond online on the Local Plan consultation website https://highpeak-consult.objective.co.uk/kse.

Question 1 Do you agree with the Council's initial view of the emerging issues identified from the new evidence? (please select one answer)
Yes
No N
If not, why?
See attached statement.
Question 2 Should the next Local Plan have a new Spatial Vision? (please select one answer)
Yes Y
No
If so, what should it say?
See attached statement

Question 3 What should be the Strategic Objectives for the next Local Plan?

See attached statement.
Question 4
Are there any other policies in the Local Plan that you think should be
updated?
(please select one answer)
Yes A
No

See attached statement
Question 5
Are there any other new policies that you think the next Local Plan should include?
(please select one answer)
Yes y
No
Please specify what the new policy should seek to address and why.
See attached statement.

Please specify which policy and how it should be updated.

Question 6

What other evidence should the Council consider to inform the next Local Plan?

See attached statement.		
See attached statement.		
Question 7 & 8 Do you have any site suggestions for housing and / or employment?		
If you would like to suggest several sites, please submit a separate form for each one.		
What is your interest in the site? (please select all that apply)		
Owner of the site	Y	
Parish / Town Council		
Local resident		
Amenity / Community Group		
Planning Consultant		

Land Agent	
Developer	
Other	
Other (please specify)	
Are you the sole or part owner of the site? (please select one answer)	
Sole Owner	Υ
Part Owner	
Neither	
If you are not the landowner or the site is in multiple ow the name, address and contact details of the land owner provided	
If not the landowner, I confirm that the landowner/s have site submission (please select one answer)	e been informed of this
Yes	

No	
Does the owner(s) support the development of the site? (please select one answer)	
Yes	
No	
Site location (including grid reference and postcode if known)	
Land at Wheel Farm & Shallcross Farm, Whaley Bridge (grid reference: SK011988030)	7)
Site Area (hectares)	
21 hectares approx	
Current Land Use(s) e.g. agriculture, employment, unused/vacant et	c.
Grassland.	
Type of site of a greenfield proviously developed land/brownfield	
Type of site e.g. greenfield, previously developed land/brownfield	
Greenfield	

Please provide a site plan clearly identifying the exact boundaries of the site.

See attached statement.	
Proposed Future Uses & Potential Site Capacity (please (please select all that apply)	specify)
Housing	У
Employment	
Mixed-use (please specify uses)	
Self-build & custom-build housing	
Basic Capacity Information – area/number of dwellings/nunits/proposed floorspace	number of
Unknown at present.	
Market interest - please choose the most appropriate cat indicate what level of market interest there is/has recent (please select all that apply)	
Site is owned by a developer	
Site is under option to a developer	
Enquiries received/ strong interest	
Site is currently being marketed	

None	
Not Known	У
Comments on market interest	
Utilities - Please tell us which of the following u (please select all that apply)	utilities are available to the site
Mains water supply	Υ
Mains sewerage	Υ
Electric supply	Υ
Gas supply	Y
Public highway	Y
Landline telephone/broadband internet	Y
Public Transport	Y
Other (please specify)	

Utilities – comments	
Constraints - Please tell us which of the following constraint the site (please select all that apply)	ts are applicable to
Land in other ownership must be acquired to enable the site to b	e developed
Restrictive covenants exist	n
Current land use(s) need to be relocated	n
Physical constraints (topography, trees, other)	n
Flood Risk	n
Infrastructure required	n
Public rights of way cross or adjoin the site	У
Land contamination	n
Access constraints	n
Environmental constraints	n

Please provide any relevant information of likely measures to overcome the above constraints

See attached statement.	
Timescales - Please indicate the approxi become available for development (please select one answer)	mate timescale for when the site will
Immediately	
Up to 5 years	У
5 - 10 years	У
10 – 15 years	
Beyond 15 years	
Unknown	

Timescales comments – particularly if you have indicated that the site is not immediately available, please explain why

It is anticipated that part of the site could be delivered within 0-5 years.
Other Relevant Information – Please use the space below for additional
information
See attached statement.
Question 9
Do you have any site suggestions for Local Green Spaces?
If you would like to auggest soveral sites, please submit a congrete form for each
If you would like to suggest several sites, please submit a separate form for each one.
one.
Site location (including grid reference and postcode if known)
, , , , , , , , , , , , , , , , , , ,
n/a

Please provide a site plan clearly identifying the exact boundaries of the site.				
Location - Is the	site in reasonably	close proximit	ty to the commun	ity it serves?

Local Significance - Is the site demonstrably special to a local community and holds a particular local significance, e.g. due to its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife?

Size / Scale - Is the site local in character and not an extensive tract of la	and?
If possible, please provide photographs of the site that support your	
comments.	

Question 10

Do you have any site suggestions for ecological improvements?

If you would like to suggest several one.	sites, please submit a separate form for each
Site location (including grid refer	ence and postcode if known)
n/a	
Please provide a site plan clearly	identifying the exact boundaries of the site
Do you own the site? (please select one answer)	
Yes (full ownership)	
Yes (part ownership)	
No	
Please specify if you also own/co	ontrol adjacent land.

y prevent
ıntil when.
ng issues,

Question 11 Do you have any site suggestions for renewable energy?

If you would like to suggest several sites, please submit a separate form for each one.

one. Site location (including grid reference and postcode if known) n/a Please provide a site plan clearly identifying the exact boundaries of the site. Please specify the proposed type and scale of energy development (Capacity (MW), Height to tip (m), Height to hub (m)) Do you own the site? (please select one answer) Yes (full ownership) Yes (part ownership) No

How can the site be accessed? Are there any restrictions that may prevent access e.g. third party ownership?	t
Please specify known designations (ecological / environmental / historical or around the proposed site) on
Current land use (including agricultural land quality rating if relevant)	
Proposed grid connection point (if known)	

Question 12 Do you have any site suggestions for other uses that you think should be included in the Local Plan? What use is the site proposed for? Site location (including grid reference and postcode if known) Please provide a site plan clearly identifying the exact boundaries of the site. Do you own the site? (please select one answer) Yes (full ownership) Yes (part ownership) No

How can the site be accessed? Are there any restrictions that may prevent access e.g. third party ownership?
Please specify known designations (ecological / environmental / historical) on or around the proposed site
Current land use
SignatureEmery Planning
Date
Thank you for completing this response form.





Project: 23-058

Site Address: High Peak Local Plan Representations 2023

Client: The Shuker Partnership

Date: 02 March 2023
Author: Victoria Wood
Approved by: Caroline Payne

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Contents

1.	Introduction	1
2.	Response to policies	2

Appendices

- **EP1.** Land ownership plan
- **EP2.** Application HPK/2016/0516 Site Plan
- **EP3.** Wardell Armstrong landscape Impact Assessment (2014) Appendix F extract



1. Introduction

- 1.1 These representations have been prepared on behalf of our client, The Shuker Partnership in response to the High Peak Local Plan Early Engagement Consultation.
- 1.2 The consultation document sets out a number of questions regarding how the strategy for High Peak should planned over the plan period to 2041.
- 1.3 These representations respond to questions 1, 2, 3, 6 and 7 in relation to the future delivery of housing within the borough and specific representations are made in respect of a proposed allocation at land at Wheel Farm and Shallcross Farm, Whaley Bridge.
- 1.4 The proposed allocation represents a contribution that two longstanding local families (Shuker and Lomas) wish to make to their local community, hence initiating the "Shallcross Legacy Project". The Partnership wishes to engage with the Town Council, to deliver a less dense and more harmonious development concept that does not visually detract, but would enhance the character of the surrounding landscape.
- 1.5 The proposed allocation seeks to address specific local housing needs and also enhance the public foot and cycle path access to the surrounding countryside providing new and improved access for the residents of Whaley Bridge to Taxal, Fernilee and the Goyt Valley. This seeks to support the community consultation priorities. The proposed allocation would also provide additional open space parkland access within the development itself for the surrounding community.

2. Response to policies

Question 1: Do you agree with the Council's initial view of the emerging issues from the new evidence? If not, why?

- 2.1 This response focuses on the issue of housing provision. The Early Engagement document confirms that the Local Housing Need for High Peak, calculated using the Government's standard method, is currently 260dpa. This figure is significantly lower than the requirement set out in the current Local Plan of 350dpa.
- 2.2 Paragraph 61 of the National Planning Policy Framework (the Framework) states:

To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – <u>unless exceptional circumstances justify an alternative approach</u> which also reflects current and future demographic trends and market signals. (Our emphasis)

2.3 Paragraph 2a-010 of the PPG explains that the standard method is only the starting point and there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates. The PPG states:

The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);
- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or
- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;



There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities are encouraged to make as much use as possible of previously developed or brownfield land, and therefore cities and urban centres, not only those subject to the cities and urban centres uplift may strive to plan for more home. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.

2.4 The examples given in the PPG for when local housing need could be exceeded are not exhaustive. The PPG also recognises at paragraph 2a-010 that the standard method does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. If the amount of housing growth is not sufficient to align with jobs growth, this will serve to constrain economic growth and place significant strain on the housing market due to the additional demand. It would also worsen affordability further if the jobs growth is not matched with sufficient housing growth. This was recognised in the Doncaster Local Plan, where LHN equated to 553 dpa but the plan requirement is 920 dpa. The Inspector's report states at paragraph 56:

"The significant uplift is intended to allow additional people to live in the Borough to ensure a sufficient working population to take account of the number of additional jobs that the Plan aims to accommodate."

2.5 Similarly, a higher figure than LHN has recently been adopted in the St Helens Local Plan. The Inspector's report states at paragraph 54:

"The PPG also makes it clear that other circumstances might also justify a higher figure. In the case of St Helens, the 486 dpa is justified to correlate with the aspirations to achieve increased economic growth and jobs which are likely to lead to increased housing need and demand."

- 2.6 Furthermore, chapter 6 of the Framework relates to building a strong competitive economy. Paragraph 81 of the Framework states planning policies and decision should help to create conditions in which businesses can invest expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business and the wider opportunities for development. Paragraph 82(c) of the Framework continues to state planning policies should:
 - c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment;
- 2.7 Therefore, to understand whether an alternative approach to the standard method is justified, it is critical that an appropriate level of jobs growth is identified. Only then can it be considered how many homes are required to support that growth.



- 2.8 The consultation document refers to the High Peak Housing and Economic Land Needs Assessment (September 2022) (HELNA) which considers the overall housing need, the need for different types of housing and employment land requirements up to 2041.
- 2.9 The HELNA acknowledges that the figure of 260dpa is only the starting the point. Paragraph 9.14 of the HELNA reflects the guidance provided within the PPG and states it is the intention of the government that the local housing need figure is minimum figure which does not attempt to predict future growth, the impact of changing Government policies, changing economic circumstances or other demographic behaviours.
- 2.10 The HELNA states the LHN figure of 260dpa is an appropriate figure moving forward if considering the baseline economic growth forecasts. However, this is not the case if a policy on approach is taken, i.e., if the level of housing growth is to align with the planned level of economic growth. Paragraph 14.18 of the HELNA states:

If, however, HPBC decides to pursue a higher level of economic growth and allocates sufficient employment land to support this, in line with the Policy On Scenario for example, then it should also consider increasing the housing target accordingly. The standard methodology is appropriate for PDNPA in so far as it can be used, with other methodologies, to determine need arising within the National Park.

2.11 In this scenario a higher housing requirement of 336dpa is suggested as appropriate. To put this figure into perspective in the context of the national policy imperative to 'significantly boost' the supply of housing, 336dpa is still lower than the current housing requirement set out in the adopted Local Plan (350dpa).

Affordable housing

2.12 Paragraph 2a-024 of the PPG states:

"The total need for affordable housing will need to be converted into annual flows by calculating the total net need (subtract total available stock from total gross need) and converting total net need into an annual flow based on the plan period.

The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes." (our emphasis)

2.13 Paragraph 67-001 also states:



"Strategic policy-making authorities will need to consider the extent to which the identified needs of specific groups can be addressed in the area, taking into account:

- the overall level of need identified using the standard method (and whether the evidence suggests that a higher level of need ought to be considered);
- the extent to which the overall housing need can be translated into a housing requirement figure for the plan period; and
- the anticipated deliverability of different forms of provision, having regard to viability."
- 2.14 Therefore, the PPG is clear that an increase in the housing requirement can be considered if it is necessary to help address the identified level of affordable housing need. Such consideration ought to be given in High Peak given the scale of affordable housing need, which is very significant.
- 2.15 The HELNA confirms that the affordable housing need for the borough cannot be met by the standard method. Paragraph 14.26 states:

Total affordable needs are in the range between 228 and 270 affordable homes per annum 2021 to 2041. This is a significant proportion of the locally assessed need based on the standard method (260 dpa) of <u>between 88% and 104%</u>. (Our emphasis)

- 2.16 Turning to past delivery of affordable housing, there have been only 432 affordable homes completed during the period 2016/17 to 2021/22. This equates to 20% of the total housing completions over this period.
- 2.17 Therefore, there is no realistic prospect of meeting the identified need for affordable by simply adopting the minimum local housing need as the housing requirement. A substantial and serious shortfall will remain.
- 2.18 Providing a higher housing requirement, and a complementary supply of viable sites, would assist in the delivery of much needed affordable housing and addressing the identified need for affordable housing in the borough and this should be carefully considered by the council as they progress the Local Plan Review. Whilst there is little question that the shortfall cannot be met in full, there is clear justification for considering an increase to the overall housing requirement, in accordance with paragraph 2a-024 of the PPG.

Past delivery

2.19 The Early Consultation document at Table 1 provides a summary of housing completions in the borough from 2011-2022. The table demonstrates the variability in housing completions over this period. It can be noted that:



- Following the adoption of the Local Plan in 2016, there was a clear trend of increased completions which is indicative of increasing market demand and a market which could support a housing requirement above that suggested by the standard method.
- For the period 2016/17 to 2021/22 (i.e., the period following the adoption of the Local Plan), total completions amount to 2,149 (358dpa). This figure is in excess of local housing need as determined by the standard method (260dpa) and the adopted housing requirement (350dpa).
- There was a marked decrease in delivery in 2020/21, however this was during the peak of the Covid-19 pandemic which may account for this figure. If the year 2020/21 is removed from the completion data for the last 6 years to account for COVID-19, the average for the period 2016/17 to 2021/22 increases to 380dpa.
- 2.20 We consider that the biggest constraint to the achievement of the housing requirement since the start of the plan period for the current Local Plan (2011) has been a lack of genuinely available, viable and deliverable sites. The sites that primarily delivered from 2016 onwards were those which came forward ahead of the plan, including those sites which were consented on appeal in the absence of an up-to-date plan. However, a number of the allocations in the current adopted plan have proven to have had trajectories that were over-optimistic within the context of the constraints present. The extent of windfall development anticipated in the Local Plans has also proven to be over-optimistic, and Policy H1 of the Local Plan has delivered very little in terms of windfall sites beyond the existing settlement boundaries. Furthermore, several sites have been subject to extremely lengthy planning application processes, with planning applications often taking more than 12 months before determination (and sometimes considerably longer).
- 2.21 Therefore, past delivery should not be used as a reason to constrain the housing requirement moving forward. The focus should be on significantly boosting housing supply and delivery. In practice, this means pursuing a requirement which at least maintains levels of recent delivery (i.e., at least 350dpa) and aligns with the planned level of economic growth (i.e., at least 336dpa).

Housing land supply

- 2.22 In the consideration of the implications of the HELNA, the consultation document states the council may need to consider supply of housing land as part of the Local Plan process to ensure that there is sufficient suitable and available land to meet whatever the new housing requirement is in the new Local Plan over the plan period to 2041.
- 2.23 As with past delivery, the housing requirement should not be constrained by the existing housing land supply. If additional land is required, then the Local Plan should allocate sufficient sites to meet the identified needs. Tatton Family Holdings Limited are proposing the allocation of land at Shallcross Farm,



Whaley Bridge through this process, which could contribute to meeting the future housing requirement in a sustainable way.

Housing requirement: summary and conclusions

- 2.24 The circumstances in High Peak provide clear justification for the application of an alternative method to determine local housing need, in accordance with the Framework and paragraph 2a-010 the NPPG. These are as follows:
 - The housing requirement in the adopted Local Plan (350dpa) is significantly higher than the minimum housing need figure produced by the standard method (260dpa).
 - Significantly higher completion figures than the minimum housing need figure produced by the standard method have been achieved in the recent past, with completions since 2016 averaging 358dpa.
 - The housing need associated with planned employment growth is likely to significantly exceed that set out in the standard method. The HELNA states that to align the housing requirement with the planned level of employment growth, the housing requirement would need to be 336dpa.
- 2.25 In addition, paragraph 2a-024 of the PPG states that an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes. The affordable housing needs of High Peak cannot be met by the standard method, as acknowledged in the HELNA. Increasing the housing requirement would therefore help to deliver much needed affordable housing and would be entirely consistent with national guidance.
- 2.26 We therefore consider that the housing requirement should be a minimum of 350dpa. This figure would:
 - Align with housing requirement in the adopted Local Plan, and would be reflective of completion levels achieved since the current Local Plan was adopted in 2016. Anything less than 350dpa would not represent a 'significant boost' to housing supply.
 - Align the housing requirement with the planned level of economic growth.
 - Ensure that the delivery of affordable housing does not collapse, in the context of the supply
 of affordable housing at present failing to meet affordable housing needs by some margin.
 Any decrease in the supply of affordable housing would represent a significant adverse
 impact.
- 2.27 In relation to affordable housing need, we consider that the scale of need remains so significant, that an increase in the requirement in excess of 350dpa should be considered. The Council should test options for up to 500dpa to understand what extent of the need can be met, and the availability of suitable sites to meet that need. Our client is promoting one such suitable site through this consultation.



Question 2: Should the next Local Plan have a new Spatial Vision? If so, what should it say?

2.28 This should be determined once all background evidence is available.

Question 3: What should be the Strategic Objectives for the next Local Plan?

2.29 To be determined once all background evidence is available.

Question 6: What other evidence should the Council consider to inform the next Local Plan?

2.30 The evidence base and reports currently being prepared by the council should be made publicly available prior to the next stage of consultation.

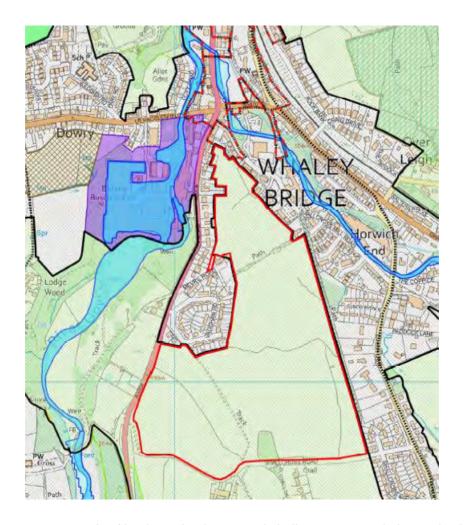
Question 7: Do you have any site suggestions for housing?

2.31 Yes

Land at Shallcross Farm

2.32 The land within the control of our client extends to around 21 hectares in size. A site location plan is provided at Appendix **EP1** showing the extent of the land within the control of Tatton Family Holdings and an extract is provided below. It is acknowledged that the entirety of the site would not be suitable for the delivery of housing.





- 2.33 The site comprises two parcels of land at Wheel Farm and Shallcross Farm, Whaley Bridge both of which are in the control of Tatton Family Holdings. The site is located within the open countryside, adjoining the existing settlement boundary of the market town of Whaley Bridge to the north, east and west. To the south, the site is bound by Shallcross Road. Whaley Bridge is identified as one of the boroughs Market Towns, which Local Plan Policy S2 identifies as being the main focus for housing, employment and service growth.
- 2.34 The site is well related to the settlement of Whaley Bridge, with local services and facilities being readily accessible on foot and by means of public transport. Bus stops are located on Buxton Road to the west of the site and Macclesfield Road to the north and east. Regular bus services are available to Buxton, Glossop, New Mills and Macclesfield. The site is intersected by a public right of way (Whaley Bridge footpath no.60.) with the Shallcross Incline running along the site's eastern boundary.
- 2.35 Being bound by existing development to the north, east and west, and physically adjoining the settlement of Whaley Bridge, the development of the site would represent a logical 'rounding-off' of the built up area of Whaley Bridge and the existing pattern of development.

- 2.36 The topography of the site slopes from east to west with existing mature tree planting present on the sites eastern and southern boundary, with additional tree planting interspersed through the site.
- 2.37 The site has been subject, in part to a previous application for residential development and dismissed appeal, the details of which are provided below:
 - Application reference HPK/2016/0516 Outline planning permission with all matters reserved (except access) for proposed residential dwellings and associated works – refused 24 April 2018
 - Planning Appeal reference APP/H1033/W/18/3214312 Appeal against refusal of application HPK/2016/0516 – Appeal dismissed 8 July 2019
- 2.38 Application reference HPK/2016/0516 and appeal reference APP/H1033/W/18/3214312 did not relate to the full extent of the proposed allocation. The plan provided at Appendix **EP2** illustrates the extent of the site to which the application related.

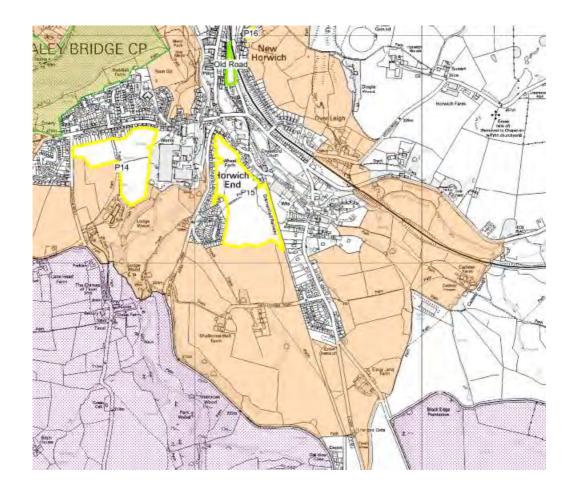
Site specific considerations

Landscape

2.39 As part of the evidence base for the 2016 Local Plan, Wardell Armstrong prepared a Landscape Impact Assessment (2014). This assessment identified the site as being land with the potential for development. The assessment identifies the site as falling within land parcel P15 and describes the site as follows:

Flat, semi-improved grassland enclosed by existing residential properties on the settlement edge. Low visual impact and effect on the setting of the National Park due to screening by vegetation particularly on southern boundary and topography to the south and east. Existing vegetation within the land and on the periphery, particularly the southern boundary, should be retained in order to maintain low visual prominence.

- 2.40 In respect of land parcel P15 the Landscape Visual Assessment states development should be initially constrained to the lower lying land, given the low visual prominence.
- 2.41 Appendix F of the Landscape Impact Assessment is provided at Appendix **EP3** and an extract showing the land included within parcel P15 is below:



2.42 Application HPK/2016/0516 was refused for a single reason principally relating to impact on landscape character:

The proposed development would be a prominent, visual intrusion into the landscape which fails to respect local landscape character and would fail to protect and enhance the setting of the valued and designated landscape of the Peak District National Park. The development would result in an undesirable encroachment into the open countryside, outside of the built up area boundary for Whaley Bridge. As such the development would erode the visual appearance and character of the open countryside contrary to Local Plan Policies H1, S6, EQ2, EQ3 and EQ6 and advice contained within the adopted Landscape Character Assessment Supplementary Planning Guidance March 2006. The identified environmental harm outweighs the social and economic benefits of the scheme; consequently the proposal does not represent sustainable development and therefore does not accord with Local Plan Policies S1 and S1a or the sustainability thread running through the NPPF. The proposal is also contrary to policies in the NPPF (especially paras 17, 109 and 58), which is a significant material consideration and consequently, development should be restricted.

- 2.43 In the consideration of appeal reference APP/H1033/W/18/3214312 the Inspector notes that it was agreed between parties that the site is accessible to a range of services and facilities and is sustainably located and would adjoin the settlement boundary and relate well to the existing pattern of development and surrounding land uses, with the proposals being of a scale appropriate for the settlement and in this regard the proposals were in accordance with Local Plan Policy H1.
- 2.44 Whilst the reason for refusal states that the proposals would "fail to protect and enhance the setting of the valued and designated landscape of the Peak District National Park" in consideration of appeal reference APP/H1033/W/18/3214312 the Inspector finds despite the physical proximity of the site to the Peak District National Park (PDNP) (which was 350m from the nearest proposed dwelling and 200m from the proposed access) the impact of the development of the proposed access and dwellings would be negligible in terms of the setting of the PDNP. The Inspector notes views into the site are limited, and where the site would be visible, it would be viewed in the context of the settlement of Whaley Bridge.
- 2.45 In response to the previous reasons for refusal in respect of application HPK/2016/0516 and the dismissed appeal reference APP/H1033/W/18/3214312, any scheme for the development of the site would be landscape led in approach acknowledging that the site in its entirety would not be suitable for the delivery of housing. Any potential future development of the site would require extensive areas of landscaping and open space to mitigate any potential visual impacts and ensure an appropriate transition between the existing urban edge and the adjacent countryside.
- 2.46 A key concern with the appeal Inspector was that the access would form an incongruous protrusion into the landscape being readily visible and incongruent with its surroundings. The site proposed for allocation includes a wider land holding presenting an opportunity for an alternative access to the site which would address the Inspector's concerns.
- 2.47 The incorporation of the land at Wheel Farm ensures that the proposal is better located to the built-up area of Whaley Bridge and that the proposal would represent a logical urban extension with the ability to provide a strong and defensible boundary to the wider countryside area. The two parcels of land together provide an additional opportunity for the creation of open space and new and improved footpath connections with Whaley Bridge and the wider countryside.

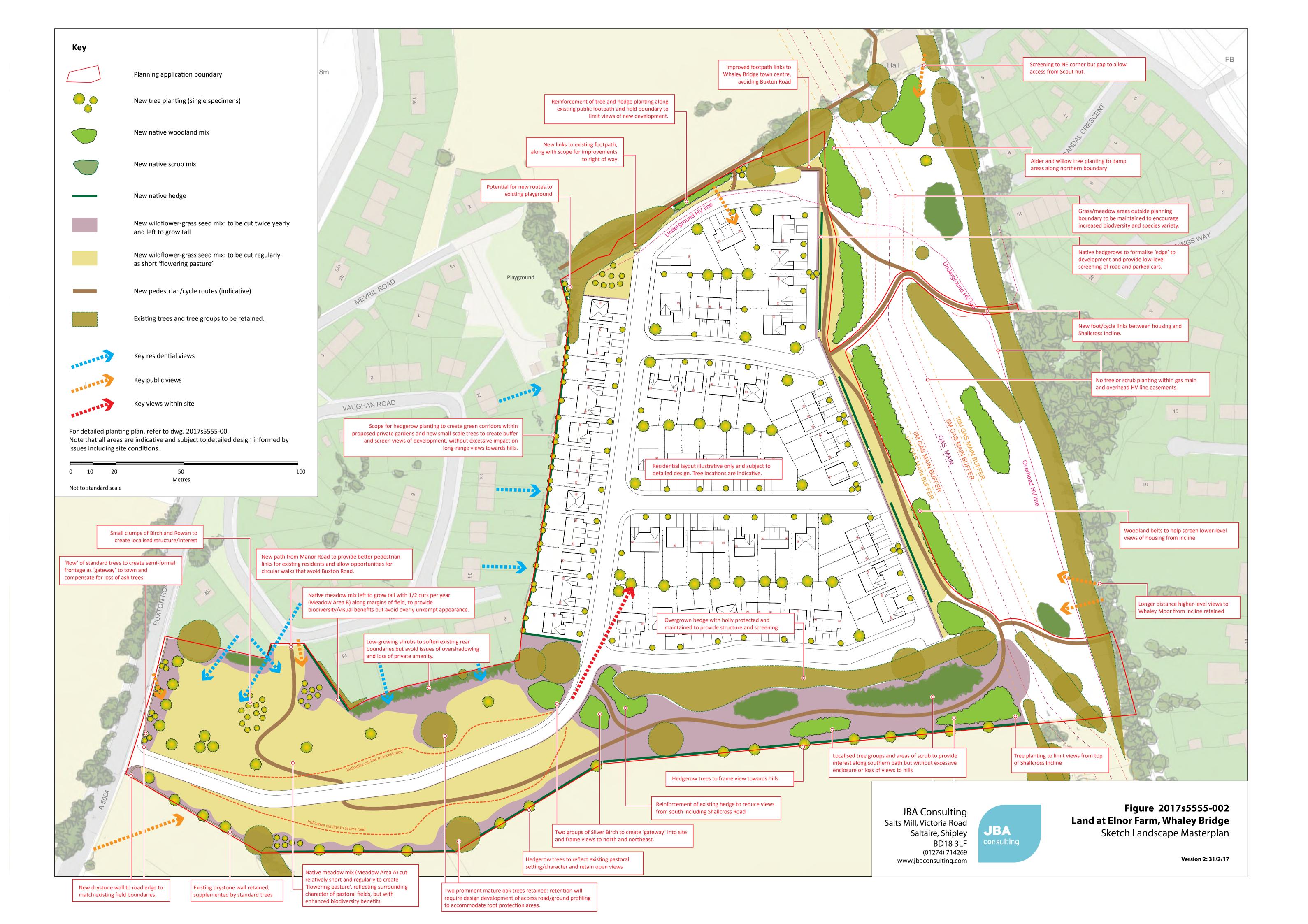
Other matters

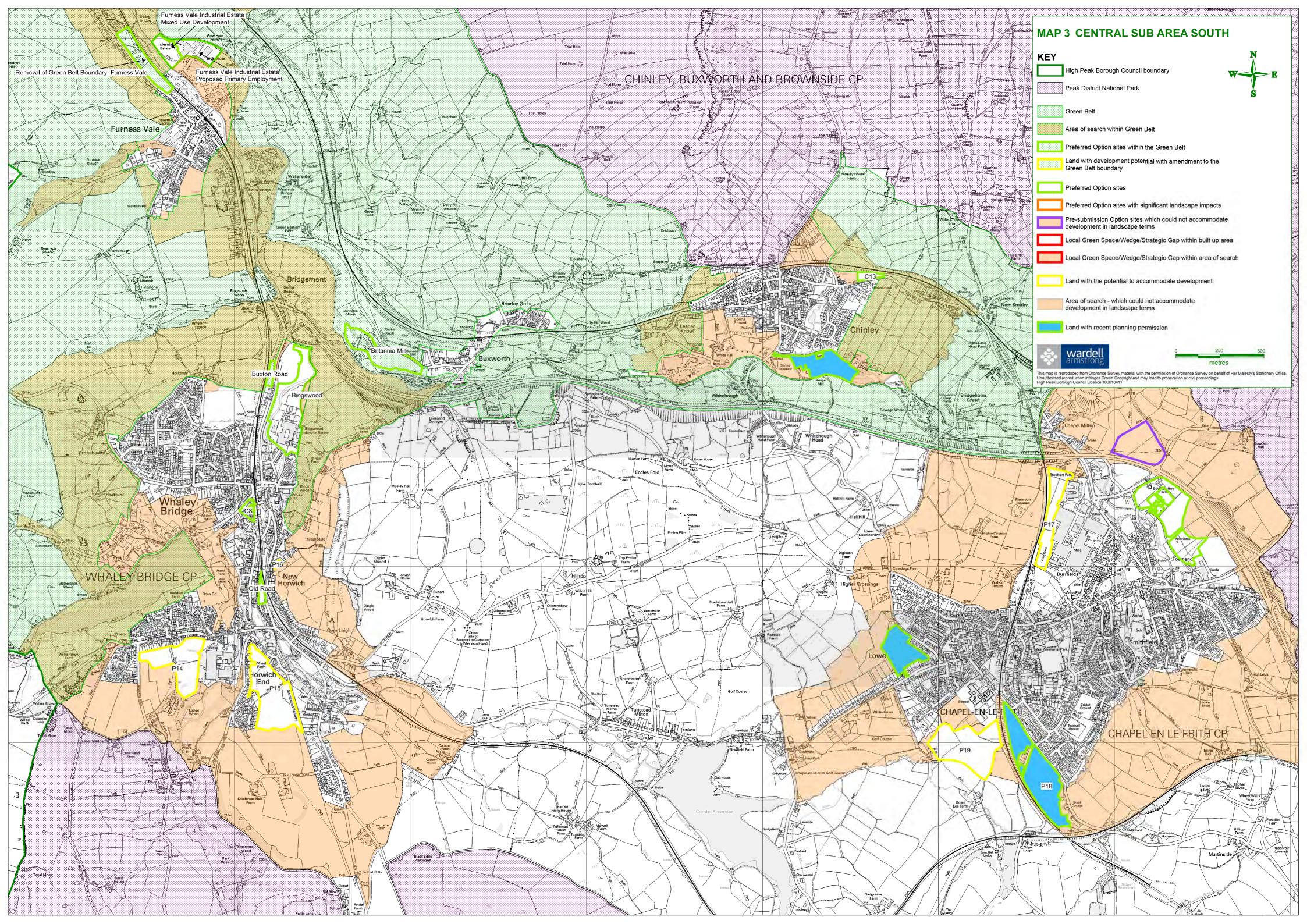
- 2.48 A gas pipeline runs along the eastern boundary of the site and any easements would need to be accommodated as part of any potential future development.
- 2.49 It is noted that the boundaries of the Whaley Bridge Conservation Area immediately adjoin the northern boundaries of the site and incorporate the properties along New Road and Buxton Road. It is not

- considered that the setting of the conservation area represents a constraint to residential development that cannot be addressed through a high quality design.
- 2.50 As outlined above, it is considered appropriate that any future scheme be landscape led any easements required could be accommodated within proposed areas of open space as part of the layout.

Conclusion

2.51 The site is sustainably located, being well related to the Market Town of Whaley Bridge, which is identified through the adopted Local Plan as a focus for future growth. The site has the potential to assist in the delivery of a mix of housing as part of the Local Plan review through the delivery of a landscape led residential development.











Comment

Consultee Peter Simon (1333821)

Email Address

Address

Event Name High Peak Local Plan - Early Engagement

Comment by Peter Simon (1333821)

Comment ID LPEA17

Response Date 14/02/23 11:20

Consultation Point Question 2 (View)

Status Submitted

Submission Type Web

Version 0.25

Question 1

Do you agree with the Council's initial view of the No emerging issues identified from the new evidence?

If not, why?

It seems a fair summary of the "emerging issues", but I would question the reliability or certainty the evidence supplied by Lichfields assessment in some respects.

1. In particular they suggest that "affordable housing" can only be delivered through market housing, and this is advice and an assumption I would like the Council to challenge and seek a second opinion for with an express intent to find other options.

It is very clear that the housing need has greatly diminished but there remains a distinct need for affordable housing. The Council should in my view not be passive here but seek a mechanism that is less inefficient than market housing delivery with an affordable component. Also I doubt the "non-viability" case made by Lichfield for affordable housing in its own right.

I therefore feel the Council should re-consult here to inform this key emerging issue for the local plan, how to deliver affordable housing without injurious land take.

2. Also I would question the authenticity and fairness of the housing Delivery record supplied, whether by Lichfields or the Council. It is my view that the Consultation leading to the Adopted Plan in 2016 did not make clear that any housing figure would need to be backdated to 2011. This should have been a clear declaration for public understanding as a case for a modified housing target on this basis would have then existed. The consultation was not to my mind fair or transparent.

Since 2016 the Council's housing delivery record has been excellent but the retrospective nature of the Plan makes it look as it has underperformed and continues to unnecessarily and wrongly force the release of sites, many of which then are land banked (for example 2 of the sites along Dinting Road, where permission was pressured against strong public objection, and in part forced by Appeal)

I think when the Council prepare the evidence towards the Plan period 2021 to 2040 the record should be set straight here. That there was a seemingly non declared housing target that applied from 2011 prior to Local Plan adoption in 2016 that has distorted the delivery record.

3. Also I am puzzled as the nature of this consultation. It is clearly in most part a "call for sites", equally for conservation and also development purposes, yet this is not apparent from the preamble. I would like to query why this consultation is framed as such, when it contains such a strong "call for sites" component. Should this not have been made in its own right and as a separate exercise?

Without wishing to be negative I would like to understand why the council has followed a rather ambiguous procedure here?

Question 2

Should the next Local Plan have a new Spatial Yes Vision?

If so, what should it say?

There might be a case for this. Especially in respect of transport as regards climate and health issues.

Question 3

What should be the Strategic Objectives for the next Local Plan?

Greater protection for the National Park and recognition of the great frailty of the environmental asset of which the Council is the "steward" and "custodian".

Question 4

Are there any other policies in the Local Plan that No you think should be updated?

Please specify which policy and how it should be updated.

There may be, but none came to mind.

Please specify what the new policy should seek to address and why.

A sustainable parking strategy possibly. Pavement parking is not acceptable and the council should no longer turn a blind eye to this, but develop a means for person centred streets.

There may be, but that will only be apparent when the Council states its position. At this stage it is simply gathering evidence and considering options.

Question 6

What other evidence should the Council consider to inform the next Local Plan?

Transport is a cross boundary issue. so I would suggest as evidence to be considered, matters relating to the urgent need sustainable travel policy in association with the National Park.

The Chair of National Park has recently said at the Buxton Transport Symposium: "we all accept that current levels of visitor car use is unsustainable and damaging, but there's no easy fix and it will require imaginative thinking and some bold actions". Such "imaginative thinking" requires strategic transport action from neighbouring planning authorities as Transport is a cross boundary issue.

Hence I would put this forward as an issue High Peak Council should gather evidence on to inform the next Local Plan.

Question 7 & 8

If you would like to suggest several sites, please submit a separate form for each one.

What is your interest in the site? (please tick all that apply)

If you are not the landowner or the site is in multiple ownership, please submit the name, address and contact details of the land owner(s) in the space provided

n/a

Site location (including grid reference and postcode if known)

n/a

Current Land Use(s) e.g. agriculture, employment, unused/vacant etc.

n/a

Type of site e.g. greenfield, previously developed land/brownfield

n/a

Proposed Future Uses & Potential Site Capacity (please specify)

Basic Capacity Information – area/number of dwellings/number of units/proposed floorspace

n/a

Market interest - please choose the most appropriate category below and indicate what level of market interest there is/has recently been in the site.

Comments on market interest

n/a

Utilities - Please tell us which of the following utilities are available to the site (please tick all that apply)

Utilities - comments
n/a
Constraints - Please tell us which of the following constraints are applicable to the site (please tick all that apply)
Please provide any relevant information of likely measures to overcome the above constraints n/a
Timescales comments – particularly if you have indicated that the site is not immediately available, please explain why
n/a
Other Relevant Information – Please use the space below for additional information
n/a
Question 9
If you would like to suggest several sites, please submit a separate form for each one.
Site location (including grid reference and postcode if known)
n/a
1,44
Location - Is the site in reasonably close proximity to the community it serves?
n/a
174
Local Significance - Is the site demonstrably special to a local community and holds a particular loca significance, e.g. due to its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife?
n/a
Size / Scale - Is the site local in character and not an extensive tract of land?
n/a
Question 10
If you would like to suggest several sites, please submit a separate form for each one.
Site location (including grid reference and postcode if known)
n/a
Please specify if you also own/control adjacent land

n/a

How can the site be accessed? Are their any restrictions that may prevent access e.g. third party ownership?
n/a
Please specify the current land use.
n/a
If the land is in any existing ecological schemes, please specify until when.
100
Please provide any details of factors affecting the site (e.g. flooding issues, topography, notable species possibly present on site etc.)
n/a
Question 11
If you would like to suggest several sites, please submit a separate form for each one.
Site location (including grid reference and postcode if known)
n/a
Please specify the proposed type and scale of energy development (Capacity (MW), Height to tip (m), Height to hub (m))
n/a
How can the site be accessed? Are their any restrictions that may prevent access e.g. third party ownership?
n/a
Please specify known designations (ecological / environmental / historical) on or around the proposed site
n/a
Current land use (including agricultural land quality rating if relevant) n/a
Proposed grid connection point (if known) n/a
Question 12
What use is the site proposed for?

n/a	l
low can wnersh	the site be accessed? Are their any restrictions that may prevent access e.g. third party ip?
n/a	
lease s ite	pecify known designations (ecological / environmental / historical) on or around the proposed
n/a	l de la companya de
urrent l	land use.
n/a	t

Site location (including grid reference and postcode if known)



Comment

Consultee

Email Address

Address

Event Name

Comment by

Comment ID

Response Date

Consultation Point

Status

Submission Type

Do you agree with the Council's initial view of the

emerging issues identified from the new evidence?

Version

Question 1

If not, why?

Peter Simon (1333821)



High Peak Local Plan - Early Engagement

Peter Simon (1333821)

LPEA15

14/02/23 11:25

Question 1 (View)

Submitted

Web

0.22

No

It seems a fair summary of the "emerging issues", but I would question the reliability or certainty the evidence supplied by Lichfields assessment in some respects.

1. In particular they suggest that "affordable housing" can only be delivered through market housing, and this is advice and an assumption I would like the Council to challenge and seek a second opinion with an express intent to find other options. It is very clear that the housing need has greatly diminished but there remains a remaining need for further affordable housing. The Council should in my view not be passive here but seek a mechanism that is less inefficient for this than market housing delivery with an "affordable" component. Also I doubt the "non-viability" case made by Lichfied for affordable housing in its own right.

I therefore feel the Council should re-consult here to inform this key emerging issue for the local plan, how to deliver affordable housing without injurious land take?

2. Also I would question the authenticity of the Delivery record supplied, whether by Lichfields or the Council.

It is my view that the Consultation leading to the Adopted Plan in 2016 did not make clear that any housing figure would need to be backdated to 2011. This should have been a clear declaration for public understanding as a case for a modified housing target on this basis would have then existed. The consultation was not to my mind fair or transparent.

Since 2016 the Council's housing delivery record has been excellent but the retrospective nature of the Plan makes it look as it has underperformed and continues to unnecessarily and wrongly force the release of sites, many of which then are land banked (for example 2 of the sites along Dinting Road, where permission was pressured against strong public objection, and in part forced by Appeal) I think when the Council prepare the evidence towards the Plan period 2021 to 2040 the record should be set straight here. That there was a seemingly non declared housing target that applied from 2011 prior to Local Plan adoption in 2016 that has distorted the delivery record.

3. Also I am puzzled as the nature of this consultation. It is clearly in most part a "call for sites", equally for conservation and also development purposes, yet this is not apparent from the preamble. I would like to query why this consultation is framed as such, when it contains such a strong "call for sites" component. Should this not have been made in its own right and as a separate exercise? Without wishing to be negative I would like to understand why the council has followed a rather ambiguous procedure here?

Question 2

Should the next Local Plan have a new Spatial Vision? No

If so, what should it say?

there is no case in the early engagement consultation to suggest a new for a new Spatial Vision

Question 7 & 8

If you would like to suggest several sites, please submit a separate form for each one.

What is your interest in the site? (please tick all that apply)

Proposed Future Uses & Potential Site Capacity (please specify)

Market interest - please choose the most appropriate category below and indicate what level of market interest there is/has recently been in the site.

Utilities - Please tell us which of the following utilities are available to the site (please tick all that apply)

Constraints - Please tell us which of the following constraints are applicable to the site (please tick all that apply)



Planning Policy Team,
High Peak Borough Council,
Buxton Town Hall,
Market Place,
Buxton,
SK17 6EL

Email: ldf@highpeak.gov.uk 02 March 2023

Letter by email only to ldf@highpeak.gov.uk

Dear Planning Policy Team,

Local Plan Review

Sport England notes that the Council has requested responses to be made through the online questionnaire. Given the nature of the comments that Sport England would like to make, we have adjusted the format slightly and we hope that this is acceptable to the Council.



Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of national, regional and local policy as well as supporting local authorities in developing the evidence base for sport.

Sport England's role is focused exclusively on sport, although it is recognised that sport can, and does, play an important part in achieving wider social, community and economic benefits (most notably in the context of health). Sport England recognises the vital role that the planning system can play in assisting with the delivery of our strategy. In addition, the development of sport within a local area can provide sufficient benefits to assist local authorities with the implementation of Local Plans and Frameworks. In this, well designed and implemented planning policies for open space, sport and recreation are fundamental to deliver broader Government objectives.

Sport England's response to the consultation is outlined in the attached table.

If you require any further information or clarification, please do not hesitate to contact the undersigned on the detail listed below.

Yours sincerely, Sharron Wilkinson

Planning Manager



Issue:	Comment			
Q4. Are there	Policy CF4 (Open Space, Sports and Recreation Facilities):			
any other				
policies in the	Paragraph 99 of the NPPF offers clear advice on how sports facilities including playing fields			
Local Plan that	should be protected from development. It states:			
you think				
should be	"Existing open space, sports and recreational buildings and land, including playing fields, should			
updated?	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.			
	Sport England is concerned that Policy CF4 is not fully compliant with the wording in paragraph			
	99 in that it only states the requirement for replacement facilities to be provided of an equivalent			
	or better quality. The requirement of paragraph 99 is that replacement facilities should be of an			
	"equivalent or better quality and quantity and in a suitable location."			



Q5. Are there any other new policies that you think the next Local Plan should include?

Active Design

Policies in the Emerging Local Plan should incorporate Active Design Principles. The Principles should be applied to all forms of development but primarily major developments.

Sport England believes that being active should be an intrinsic part of everyone's daily life – and the design of where we live and work plays a vital role in keeping us active.

Good design should contribute positively to making places better for people and create environments that make the active choice the easy choice for people and communities. Sport England in partnership with Public Health England, have produced the Active Design Guidance. This guidance builds on the original Active Design (2007) objectives of improving accessibility, enhancing amenity and increasing awareness, and sets out the Ten Principles of Active Design.

The guide features an innovative set of guidelines to get more people moving through suitable design and layout. It includes a series of case studies setting out practical real-life examples of the principles in action to encourage planners, urban designers, developers and health professionals to create the right environment to help people get more active, more often.

The Active Design Principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design.



The guidance can be viewed on this link:

https://www.sportengland.org/media/3964/spe003-active-design-published-october-2015-high-quality-for-web-2.pdf

Community Use of Education Facilities

Community use is the managed use of a school or educational facility by the local community who would pay a reasonable fee to use the facility. The ability to access good pitches and facilities within the local community is vital to any sports organisation, yet many clubs struggle to find places to play and train. A large number of sporting facilities are located on school sites and making these available to sports clubs can offer significant benefits to both the school and the local clubs. Community use of school sports facilities provides many benefits including:

- Increasing educational attainment we know that offering children a varied menu of
 activities outside the core teaching hours is an significant complement to classroom
 teaching. It would be difficult for a pupil to play truant during the school day, only to turn up
 for football practice at the school later in the day!
- Improving attitudes and attendance alongside increased educational attainment comes increased pupil motivation, self-esteem and behavioural improvement.
- Engaging pupils at risk extended opportunities in schools for sport improve learning environments. They are popular with children. They are fun. They help children express



themselves, developer wider interests and skills and find activities they both enjoy and are good at. Evidence shows that with the involvement of wider community and examples of peer and adult role models, sport can help schools to engage more effectively with pupils who have poor attendance records, with low achievers and with hard-to-reach groups.

- Directing people from anti social behaviour Crime, in particular youth crime, is also often
 perceived as the most important issue for many communities: helping to reduce youth
 crime through extended schools benefits the community. Head for head, much greater
 public resources are spent though both education and youth justice system funding on the
 relatively few individuals at risk than for the great majority of their peers. Relatively small
 resources devoted to structured, long term sport interventions in this area is money well
 spent.
- Healthier communities self-evidently, an increase in sport participation leads to healthier communities, both physically (with improvements to cardio-vascular disease, strokes, osteoporosis) through increased exercise and mentally (with improvements in mental health) though social bonds formed with other participants in sessions and classes and the increase in self esteem, confidence and self-efficacy that these activities give.
- Economic vitality and workforce development community sport use can help the
 economy vitality and workforce development of the neighbourhood. Sport activities provide
 many opportunities for volunteer organisers, volunteering generally, sports coaches,
 stewards etc. these provide opportunities for individuals to gain new skills and gain new
 qualifications: coaching, workshop-leading or tuition qualifications.



 Wellbeing - increased sports participation increases public health, the building of trust, community capacity and cohesion, and improvements in economic vitality - all lead to a better quality of life for the community and a sense of well being. This in turn benefits the school over time when higher community regard is reflected in the increasing numbers of prospective parents wishing to enrol their children at the school.

The community use of schools and other educational establishments can also contribute to safety by directing people from anti social behaviour. Crime, in particular youth crime, is also often perceived as the most important issue for many communities: helping to reduce youth crime through extended schools benefits the community. Head for head, much greater public resources are spent though both education and youth justice system funding on the relatively few individuals at risk than for the great majority of their peers. Relatively small resources devoted to structured, long term sport interventions in this area is money well spent.

Community use can also bring a presence to a school or other educational establishment when they are traditionally closed, such as evenings and school holidays.

A policy should therefore encourage any sport facilities, provided as part of new education establishments, are made available for community use.



Q6. What other evidence should the Council consider to inform the next Local Plan? Planning for Sport and Recreation

The NPPF deals with promoting healthy communities. Paragraph 98 states;

Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.

The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required.

In light of the above, it is Sport England's policy to challenge the soundness of Local Plan documents which are not justified by:

- an up to date playing pitch strategy (carried out in accordance with a methodology approved by Sport England)
- an up to date built sports facilities strategy (carried out in accordance with a methodology approved by Sport England).



For a playing pitch strategy to be considered "up to date", it should have been undertaken within the last three years. For a built facilities strategy to be considered "up to date" it should have been carried out within the last five years.

The High Peak Playing Pitch Strategy and Action Plan is dated January 2018 and so is considered "out of date."

There is a requirement for this document to be updated to provide the robust assessment required by paragraph 98 of the NPPF.

Sport England has guidance on the production of Playing Pitch Strategies and other indoor and outdoor sport facilities studies, and they can be viewed on this links:

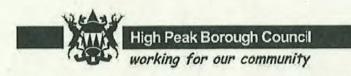
http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/playing-pitch-strategy-guidance/
http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/assessing-needs-and-opportunities-guidance/

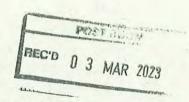
The occupiers of new residential development would generate demand for sporting provision.



The existing provision within an area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. In this regard, new development should contribute towards meeting the demand that it generates through the provision of on-site facilities and/or providing additional capacity off-site. Sport England can assist in providing data on the existing facilities in the area.

The level and nature of any provision should be informed by a robust evidence base such as an up to date Sports Facilities Strategy, Playing Pitch Strategy (PPS) or other relevant needs assessment. Section 8 of the NPPF also advises that any new sports facility needs arising as a result of new development should be met. As stated for question 6 above, an up to date evidence is required in South Derbyshire to identify shortfalls in existing sports provision and to identify how an increase in the demand in an area would generate additional/new demand for sports provision.





HIGH PEAK LOCAL PLAN EARLY ENGAGEMENT RESPONSE FORM

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The Local Plan sets out detailed policies and specific proposals for the development and use of land in High Peak (outside of the Peak District National Park). Your feedback will help the Council to identify the issues and options for the Local Plan for consultation later in 2023.

Your Contact Details:

	Personal details	Agent's details (if applicable)			
Title	MILS				
Name	E SPRING.				
Job title (if applicable)	· · · · · · · · · · · · · · · · · · ·	F 1			
Organisation (if applicable)					
Address					
Post code					
Telephone no.		DO NOT MAKE			
Email address		PUBLIC:			

PLEASE NOTE that responses must be attributable to named individuals or organisations. They will be held by the Council and will be available to view publicly and cannot be treated as confidential. Your contact details will not be published, but your name and organisation (if relevant) will. High Peak Borough Council maintains a database of consultees who wish to be kept informed about the Local Plan. Details of our data protection and Privacy Notice can be found on the council's website at: https://www.highpeak.gov.uk/YourData

Please complete and return this form by **5pm** on **3rd March 2023** by email to: ldf@highpeak.gov.uk; or

by post to: Planning Policy, High Peak Borough Council, Town Hall, Buxton, Derbyshire, SK17 6EL

Alternatively, you can respond online on the Local Plan consultation website https://highpeak-consult.objective.co.uk/kse.

Question 1 Do you agree with the Council's initial view of the emerging issues identified from the new evidence? (please select one answer)
Yes V
If not, why?
Question 2 Should the next Local Plan have a new Spatial Vision? (please select one answer)
Yes
No
If so, what should it say?
To Protect and change the spaceal vision of He High Penk am future development's should be of a sympethetic nature so as not to encroach an area's creating no separation of villages/ hamlets. Each loss/village/humlet has it's own chanceture. which should be maintained.

Question 3 What should be the Strategic Objectives for the next Local Plan?

Ensure that any face objectives should be
to the benifit of all laking into account the
growth that his taken part in the area not just
expansion to baild houses for the suke of
box ticking but the create the
right kind of developments are
put in place.

Dith the provide that local people get
opportunities to work on the developments

(Apprenticestips)!

Question 4

updated? (please select on	o angwork					
Yes Yes	Remove	- Parkins	restrice the cos	tions in	remanuble	
No	toon> a					

Please specify which policy and how it should be updated.

Question 5 Are there any other new policies that you think the next Local Plan should include? (please select one answer)	
Yes	
Please specify what the new policy should seek to address and why.	
Biochiversity - Don't just give it ly Service. Ensure that wild life habitats are protected not just moved around	

Fuergency Service Incresse
Youth facilities - (so cining, bowling ally??)
School link to Agricultural [Forcestry | local industry
for long term careers not just short term employment

What other evidence should the Council consider to inform the next Local

Question 6

Plan?

Age demographic for each area Purpose built community with the right support networks in place.
Purpose built networks in place.
support of
Make sure that any, all changes are well publicised prior to being, implimented. Do not assume everyone has access to a computer or is able assume everyone has access to a computer or is able
resume everyone has access to a computer or is able
1 - 100 holl(1) (N
to number of people of all ages from
Classop and New Mills who were under
of this New Man proposal which goes to show how little publicity it has been given!!!
가입니다

Question 7 & 8

Do you have any site suggestions for housing and / or employment?

If you would like to suggest several sites, please submit a separate form for each one.

(please select all that apply)	
Owner of the site	
Parish / Town Council	
Local resident	
Amenity / Community Group	
Planning Consultant	

Land Agent						
Developer						
Other						
Other (please s	specify)					
Are you the so (please select o	le or part own ne answer)	er of the s	ite?			
Sole Owner Part Owner						
Neither						
If you are not the the name, addr provided	ne landowner ess and conta	or the site	is in multi of the land	ple owne owner(s)	rship, ple in the sp	ase submit ace
If not the lando site submission (please select or	1	n that the	landowner	/s have b	een inforr	ned of this
Yes						

No	
Does the owner(s) supp (please select one answe	oort the development of the site? er)
Yes	
No (1944) He had a second	
Site location (including	grid reference and postcode if known)
Site Area (hectares)	
Current Land Use(s) e.g	. agriculture, employment, unused/vacant etc.
Type of site e.g. greenfi	eld, previously developed land/brownfield

Please provid	de a site plan clearly identifying the e	exact boundaries of the site.
	ture Uses & Potential Site Capacity (all that apply)	please specify)
Housing		
Employment		
		가 보통되고 그 사람은 함께 보는 것 - 사람들은 그를 사용하는 것이다.
Mixed-use (pl	ease specify uses)	
Self-build & cu	ustom-build housing	
· · · · · ·	ty Information – area/number of dwe ed floorspace	llings/number of
	st - please choose the most appropr level of market interest there is/has all that apply)	
Site is owned	by a developer	
Site is under o	option to a developer	
Enquiries rece	eived/ strong interest	
	ly being marketed	

None						
Not Known						
Comments on m	narket interest		•			
Utilities - Please (please select all Mains water supp Mains sewerage Electric supply	l that apply) ply					
Gas supply						
Public highway						
Landline telepho	one/broadband i	internet				
Public Transport	t					
Other (please sp	pecify)					

Utilities – comments	
Constraints - Please tell us which of the the site (please select all that apply)	e following constraints are applicable t
Land in other ownership must be acquired	d to enable the site to be developed
Restrictive covenants exist	
Current land use(s) need to be relocated	
Physical constraints (topography, trees, ot	ther)
Flood Risk	
Infrastructure required	
Public rights of way cross or adjoin the site	
Land contamination	
Access constraints	
Environmental construints	

Please provide any relevan above constraints	nt information o	f likely meas	sures to overcome the
	•		
		•	
(please select one answer) Immediately			
Up to 5 years			
5 - 10 years			
10 – 15 years			
Beyond 15 years			
Unknown			

. •				

				The Mark Transport of the Community of t
Other Releva nformation	nt Informat	ion – Please ι	ise the space	below for additional
uestion 9				
	any site suc	gestions for	Local Green S	Spaces?
you would lik ne.	ce to sugges	t several sites,		t a separate form for each
o you have a you would lik ne.	ce to sugges	t several sites,		t a separate form for each

lease provide	a site plan clearly i	dentifying the exa	ct boundaries of	f the site.
ocation - Is the	site in reasonably	close proximity to	o the community	it serves

Local Significance - Is the site demonstrably special to a local community and holds a particular local significance, e.g. due to its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife?

e / Scale - Is th	e site local in ch	aracter and no	t an extensiv	e tract of land
	e provide photo	graphs of the s	ite that supp	ort your
	e provide photog	ງraphs of the s	ite that supp	ort your
possible, pleas mments.	e provide photog	graphs of the s	ite that suppo	ort your
	e provide photog	graphs of the s	ite that suppo	ort your
	e provide photo	graphs of the s	ite that supp	ort your
	e provide photo	graphs of the s	ite that supp	ort your
	e provide photo	graphs of the s	ite that supp	ort your

Question 10 Do you have any site suggestions for ecological improvements? If you would like to suggest several sites, please submit a separate form for each one. Site location (including grid reference and postcode if known) Please provide a site plan clearly identifying the exact boundaries of the site. Do you own the site? (please select one answer) Yes (full ownership)

res (iuii ownership)				
Yes (part ownership)			İ	
No				
Please specify if you a	lso own/control	adjacent la	nd.	

	e be accessed? A d party ownership		trictions that may	prevent
Please specify t	the current land ι	Jse.		
If the land is in	any existing ecol	ogical schemes,	please specify ur	ıtil when.
Please provide topography, no	any details of fac table species pos	ctors affecting the	e site (e.g. floodin n site etc.)	ıg issues,

Question 11

Do you have any site suggestions for renewable energy?

If you would like to suggest several sites, please submit a separate form for each

one.	THE GODGING CONTINUE COOL
Site location (including grid reference and postco	de if known)
Please provide a site plan clearly identifying the	exact boundaries of the site.
Please specify the proposed type and scale of en (MW), Height to tip (m), Height to hub (m))	ergy development (Capacity
Do you own the site? (please select one answer)	
Yes (full ownership)	
Yes (part ownership)	
No	

Please spe or around t	cify known des he proposed s	signations (eco ite	ological / envi	ronmental / hi	storical) or
Current lan	d use (includin	ıg agricultural	land quality i	rating if releva	nt) 144 ₁ - 144 - 15
³roposed ç	grid connection	point (if knov	vn)		

Do you have any site suggestions for other uses that you think should be included in the Local Plan?	
What use is the site proposed for?	
Site location (including grid reference and postcode if known)	
Site location (including grid reference and postcode if known)	
Please provide a site plan clearly identifying the exact boundaries of the si	te.
Do you own the site?	
(please select one answer)	
Yes (full ownership)	
Yes (part ownership)	

How can the site be accessed? Are there any restrictions that may prevent access e.g. third party ownership?	
Please specify known designations (ecological / environmental / historical) or around the proposed site	on
보고 있다. 그런데 그런데 보고 있는데 보고 있다. 그런데	
current land use	
ignature .	• • • • • • • • • • • • • • • • • • • •
ate 3 3 2025	
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hank you for completing this response form.	



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The Local Plan sets out detailed policies and specific proposals for the development and use of land in High Peak (outside of the Peak District National Park). Your feedback will help the Council to identify the issues and options for the Local Plan for consultation later in 2023.

Your Contact Details:

	Personal details	Agent's details (if applicable)
Title	Mrs	11/2/14/20
Name	Cath Moss	
Job title (if applicable)	Chair	
Organisation (if applicable)	Sustainable Hayfield	
Address		
Post code		
Telephone no.		
Email address		

PLEASE NOTE that responses must be attributable to named individuals or organisations. They will be held by the Council and will be available to view publicly and cannot be treated as confidential. Your contact details will not be published, but your name and organisation (if relevant) will. High Peak Borough Council maintains a database of consultees who wish to be kept informed about the Local Plan. Details of our data protection and Privacy Notice can be found on the council's website at: https://www.highpeak.gov.uk/YourData

Please complete and return this form by 5pm on 3rd March 2023

by email to: ldf@highpeak.gov.uk; or

by post to: Planning Policy, High Peak Borough Council, Town Hall, Buxton,

Derbyshire, SK17 6EL

Alternatively, you can respond online on the Local Plan consultation website https://highpeak-consult.objective.co.uk/kse.

from	tion 1 ou agree with the Council's initial view of the emerging issues identified the new evidence? se select one answer)
Yes	
No	

If not, why?

Whilst the generality of the emerging issues profiled are reasonable, we find the commitment to meet known housing demand for affordable, social, and age-appropriate housing are inadequate. Notably:

- * the proposals advanced mean the borough will continue to fail to meet local demand for social housing. Figures recently released from the Department for Levelling Up suggest that netting sales of social housing from very modest builds of new social housing has meant a reduction of 156 social housing units in the last decade (to March 2022). This at a time when the unmet demand for social housing in High Peak is 1,250. This is a housing crisis of continuing significance and scale, causing untold stress. There needs to be a renewed focus on development of social housing as a key constituent of future housing provision in a new Local Plan;
- * the review itself acknowledges that historic provision of affordable housing is failing to meet demand. You recognise that your own assessed demand for affordable housing is equivalent to 88-104% of total assessed housing needs per annum, based on a revised future housing requirement of around 260 homes per annum. That is, all future housing needs up to 2041 could be met by affordable housing provision. This needs to be more 'centre stage' in Local Plan policies going forward;
- * the review identifies the collective ageing of High Peak's population and suggests a need for elderly housing provision of 45-60 units p.a. up to 2034, i.e. around 20% of total new housing starts. Our reading of the Plan review, however, does not suggest what consideration might be given to prioritising such developments;
- * in all, a reset of local housing policy and developments is clearly due, via Policy S3. Your own data suggests pathways forward. You state that most households needing affordable housing (being equivalent to your likely total of proposed housing starts) require 1 or 2-bedroomed properties, yet you propose to allocate over 50% of all new housing permissions to properties to 3 or more bedrooms. This appears self-defeating and does not make sense;
- * far better to focus on smaller properties to meet apparent demand, within which will be a significant proportion of social housing. Such properties would take less space and, all other things being equal, have a lower carbon footprint. For social housing starts, the council would likely be better-placed to lever high design standards into their build, so that they are much more energy-efficient. Smaller properties might also attract smaller, more local developers, and result in fewer larger estates developed by large national firms;
- * such a policy, coupled with continuing focus on new housing for single persons and pensioner households, could free up larger family homes for resale to larger households, to meet demand from those quarters, rather than relying on new housing starts;
- * you mention commitment to refit of existing properties. With some exceptions, refits represent a more environmentally sustainable use of housing stock than the alternative (building more homes to accommodate growing households). We would want a renewed Local Plan to recognise this, and for the Council to consider how its policies can be flexed to encourage more refits/small extensions and how, with partners, it might fund a Refit Advisory Service to support householders on their 'refit journey'.

We also note identification of the trend towards an ageing population, with specific reference to the declining number of young people. We look for the plan to identify the reason for this decline in a younger population and to incorporate measures to ensure the area is an attractive place for young people to live and work. Relevant issues may be jobs, housing type and affordability, public transport, leisure facilities, modern workspace facilities, combined housing and workspace facility.

There is no mention of the recent reduction in public transport provision in the area, particularly post covid, which will be supressing public transport demand and risks feeding a negative spiral or reduced provision / reduced usage / reduced provision. This plan needs to actively think out of the box to reverse this current spiral and to actively measure journeys by car, bus, bike etc such that a proactive plan to transition away from car use can be implemented and tracked.

There appears to be no reference to the emerging national crisis with the wastewater treatment system infrastructure, the inadequacy of which currently requires illegal levels of raw sewage discharge via overflows into our rivers. This will have an impact on future developments in High Peak if the situation is not to be made worse and so requires consideration. This issue is also of relevance to the Developer Contributions SPD document.

Many villages within High Peak and nationally that are within tourist areas have seen increases in the proportion of homes which are held as second homes or are sub-let as holiday properties. Hayfield is progressively experiencing this. Eventually this process results in an absence of an active and vibrant community within the village. Community volunteers are the custodians of the environment in which we live and the loss of people who live locally will directly impact the ability to maintain the local biodiversity. The Local Plan needs to consider a strategy to avoid this – e.g. future development could be focused on affordable accommodation and restricted to local people.

Very careful consideration needs to be given to the application within High Peak of any biodiversity credits national scheme. The experiences to date with carbon credits indicate that there is a likelihood of it being used by traders as a money-making opportunity rather than it genuinely benefiting the environment. Local involvement in this scheme will need safeguards to ensure High Peak extracts practical benefit.

Question 2	
hould the next Local Plan have a new Spatial Vision	?
please select one answer)	

Yes	/
No	

If so, what should it say?

- * it should identify future housing types/developments to be prioritised, drawn from observations made in response to Question 1;
- * it should include, and promote, development of more ground- and roof-mounted solar provision, to meet our collective need for more onshore renewable generating capacity;
- * it should presume in favour of wind turbines, from small installations on commercial sites and farm developments, through to larger-scale developments, subject to legal provisions, acknowledging there will be sites where such developments will be contra-indicated.
- * it should include a travel plan that addresses the inadequate / downward spiral in public transport provision to and between the main towns and supporting villages in the area to 1) encourage visitors to travel to the area, which includes access to the Peak Park via public transport, 2) to encourage residents to travel around the area via public transport for work and leisure purposes, 3) to make it easier for residents to commute into neighbouring cities via public transport and 4) to avoid residents without cars to be excluded from participation in activities outside of their immediate residence, particularly in the evenings and at weekends. This should include review of frequency of public transport services and the integration of rail and bus services, particularly on popular commuter / visitor travel routes.
- * it should include the promotion of active travel via a strategy that gives equal prominence / priority to non-car users i.e. walkers, cyclists, buses within each of the borough's towns but also on major commuter / visitor routes in and out of the region e.g. A6. Consideration should be given for Electric Bike shuttle hire services between the town's railway stations and local villages without a station on popular visitor / commuter routes. E.g. New Mills to Hayfield.
- * taking account of the previous 2 points, it should include a vision that all towns and major villages support full inclusion of non-car owning residents with a stated objective to achieve a significant proportionate increase in non-car journeys. Commitments to '15 minute communities' would be most welcome

The existing vision should be revised. Over the lifetime of the Local Plan the landscape will need to change significantly in order to mitigate climate change and stop biodiversity loss. The Local Plan needs to visualise how that landscape will look (see DWT Derwent Connections and Wild Peak projects) and consider how all the other elements within the plan will be accommodated to allow that landscape change to happen.

Question 3 What should be the Strategic Objectives for the next Local Plan?

S1, and supporting policies and plans, needs to be reconfigured to:

- * recognise that the council (unanimously, we understand) has, since the last Local Plan was agreed, made a declaration of a Climate Emergency, and agreed two Climate Action Plans. These bear on all aspects of Council operations and its links with the wider community, in pursuit of very ambitious greenhouse gas reduction targets.
- * elevate, as a result, climate change mitigation and adaptation policies at the head of this objective, since all other considerations should be made by reference to these commitments. Other objectives which do not support achievement of these commitments need to be examined critically;
- * the council's commitments in respect of achievement of net zero status have 2030 as the target date. It seems clear the council is going to miss this target, by a distance. You indicate the next Local Plan may contain provisions going forward to 2041 i.e. 18 years. The Council has data from the Tyndall Centre suggesting that it needs to cut local greenhouse gas emissions by around 15% p.a. to achieve wider objectives. If it did so by 2041, and there is little indication it will, it would still not have achieved net zero status, without substantial offsetting measures. That is why there needs to be a continuing, explicit and strong focus on this within this objective, or by establishing an objective which deals solely with those council commitments and lays the basis for subordinate and consequential policies.
- * aligned to this, the council needs to set out its approach to working, with chosen and relevant statutory partners, to developing a Local Area Energy Plan, bearing on generation, transmission and management of demand for energy, as is commended by the Catapult consultancy. It is only via such high level collaborative work that the council is going to get anywhere near government targets of 68% and 78% reductions in greenhouse gas emissions by 2030 and 2035 respectively.
- * also aligned to this, have a stated objective with regard to reducing the proportion of journeys to and within the region by car and commit to clearly stated "Clean Air Zone" objectives working in combination with the Peak Park where necessary.
- * Combined with the above, the halting of biodiversity loss should be explicitly stated as an objective, or encompassed with existing objective S05.

Question 4

Are there any other policies in the	Local Plan that you think should be
updated? Only via such high level	-
(please select one answer)	

Yes	/

No
Please specify which policy and how it should be updated.
* development management policies need to be re-examined so as to ensure there is regular and continuous monitoring of Local Plan provisions, for evidence of their impact, and for summaries of these to be made public;
* as an example. the Derbyshire Spatial Energy Strategy (2022), summarised in this Local Plan review document, is said to include regional projections for development of heat pumps, low carbon heating systems and energy generation capacity, alongside EV deployments, disaggregated by constituent authorities. But there is no evidence cited here of what they are, what account is being taken of them, or what the implications of them are.
* without assembly of meaningful and measurable achievement data, it is hard to see how delivery of commitments can be said to be being proactively managed.
Are there any other new policies that you think the next Local Plan should include? (please select one answer) Yes X No Please specify what the new policy should seek to address and why.
* that 100% new housing is built to EPC rating A or B, and with public transport service provision and or easy access to cycle / walking routes.
* Working in conjunction with the Peak Park where necessary, have clearly identified clean air zones by 2025.

Question 6 What other evidence should the Council consider to inform the next Local Plan?

* Its record of achievement to date in key policy areas. Where achievements are behind what was anticipated or sought, the reasons for this need to be carefully weighed so that lessons can be learned and key drivers put in place to avoid repetition in future.		
Question 7 & 8 Do you have any site suggestion	ons for housing and / o	or employment?
If you would like to suggest sever one.	ral sites, please submit a	a separate form for each
What is your interest in the site (please select all that apply)	9 ?	
Owner of the site		
Parish / Town Council		
Local resident		
Amenity / Community Group		
Planning Consultant		

Land Agent	
Developer	
Other	
Other (please specify)	
Are you the sole or part owner of the site? (please select one answer)	
Sole Owner	
Part Owner	
Neither	
If you are not the landowner or the site is in multiple own the name, address and contact details of the land owner(provided	
If not the landowner, I confirm that the landowner/s have	been informed of this

9

site submission

(please select one answer)

Yes	
No	
Does the owner(s) support the development of the site? (please select one answer)	
Yes	
No	
Site location (including grid reference and postcode if kno	own)
Site Area (hectares)	
Current Land Use(s) e.g. agriculture, employment, unused	/vacant etc.
Type of site e.g. greenfield, previously developed land/bro	wnfield

Please provide a site plan clearly identifying the exact boundaries of the site.	
Proposed Future Uses & Potential Site Capac (please select all that apply)	city (please specify)
Housing	
Employment	
Mixed-use (please specify uses)	
Self-build & custom-build housing	
Basic Capacity Information – area/number of units/proposed floorspace	dwellings/number of
Market interest - please choose the most app indicate what level of market interest there is (please select all that apply)	
Site is owned by a developer	
Site is under option to a developer	
Enquiries received/ strong interest	

Site is currently being marketed	
None	
Not Known	
Comments on market interest	
Utilities - Please tell us which of the following utilities are (please select all that apply)	available to the site
Mains water supply	
Mains sewerage	
Electric supply	
Gas supply	
Public highway	
Landline telephone/broadband internet	
Public Transport	

Utilities – comments		
Constraints - Please tell us which of the following constraints the site (please select all that apply)	are applicable to	
Land in other ownership must be acquired to enable the site to be	developed	
Restrictive covenants exist		
Current land use(s) need to be relocated		
Physical constraints (topography, trees, other)		
Flood Risk		
Infrastructure required		
Public rights of way cross or adjoin the site		
Land contamination		
Access constraints		
Environmental constraints		

Please provide any relevant information of likely measures to overcome the above constraints	
Timescales - Please indicate the approximate timescale become available for development (please select one answer)	for when the site will
Immediately	
Up to 5 years	
5 - 10 years	
10 – 15 years	
Beyond 15 years	
Unknown	

Timescales comments – particularly if you have indicated that the site is not immediately available, please explain why	
Other Relev information	ant Information – Please use the space below for additional
Question 9	
	e any site suggestions for Local Green Spaces?
Do you nav	o any one daggeonone for Local Groom opacio.
All areas belo	w are within Hayfield Parish Boundary and outside of Peak National Park.
1 Hayfield crid	cket field
2 Hayfield Par	rk Valley Road
3 Hayfield 'old	d school' field
4 Elle Bank	
5 Kinder Woo	od (south end)
6 Havfield Cei	

•	•	, ,		
Grid References give	n for each as follo	ws:		
1 SK0381086886				
2 SK0384986764				
3 SK0351787155				
4 SK0481586556				
5 SK0458486913				
6 SK0319186853				

Please provide a site plan clearly identifying the exact boundaries of the site.

Site location (including grid reference and postcode if known)

Location - Is the site in reasonably close proximity to the community it serves?

1 TO 6. Yes	

Local Significance - Is the site demonstrably special to a local community and holds a particular local significance, e.g. due to its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife?

1 to 3 Rec	reational value
5-6 Tranqı	uility & wildlife
7 Historic,	, tranquillity
Size / Sca	ale - Is the site local in character and not an extensive tract of land?
1 to 6. Yes	s, local in character
f possibl comment	le, please provide photographs of the site that support your ts.
Question	

Do you have any site suggestions for ecological improvements?

If you would like to suggest several sites, please submit a separate form for each one.

Site location (including grid reference and postcode if known)

All areas below are within Hayfield Parish Boundary and outside o	f Peak National Park.
1 Land north of Kinder Road Hayfield, bounded by Kinder Bank wo to the west and Peak Nat Park boundary to the north. Suitable for	
2 Land either side of the River Sett west of Hayfield and within the Suitable for wilding	e Hayfield parish boundary.
Please provide a site plan clearly identifying the exac	ct boundaries of the site
Grid References given for each as follows:	
1 SK0423786849. Approx 300m x 100m	
2 SK0278487168. Approx 700m x 200m	
Do you own the site? (please select one answer)	
Yes (full ownership)	
Yes (part ownership)	
No	Х
Please specify if you also own/control adjacent land.	
No	

How can the site be accessed? Are there any restrictions that may prevent access e.g. third party ownership?
Not known, private ownership
Please specify the current land use.
Agriculture – hill farming
If the land is in any existing ecological schemes, please specify until when. Please provide any details of factors affecting the site (e.g. flooding issues, topography, notable species possibly present on site etc.)
Not known. Sites are ecologically poor and could be wilded to improve biodiversity in accordance with government policy

Question 11

Do you have any site suggestions for renewable energy?

If you would like to suggest several sites, please submit a separate form for each one.

Site location (including grid reference	and postcode if known)
Please provide a site plan clearly iden	tifying the exact boundaries of the site.
Please specify the proposed type and (MW), Height to tip (m), Height to hub (scale of energy development (Capacity m))
Do you own the site? (please select one answer)	
Yes (full ownership)	
Yes (part ownership)	
No	
How can the site be accessed? Are the access e.g. third party ownership?	ere any restrictions that may prevent

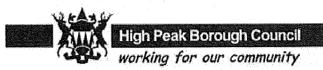
Please specify known designations (ecological / environmental / historical) on or around the proposed site
Current land use (including agricultural land quality rating if relevant)
Proposed grid connection point (if known)
Question 12
Do you have any site suggestions for other uses that you think should be included in the Local Plan?
What use is the site proposed for?

Site location (including grid reference	e and postcode if known)
Please provide a site plan clearly ide	entifying the exact boundaries of the site.
Do you own the site?	
(please select one answer)	
Yes (full ownership)	
Yes (part ownership)	
No	
How can the site be accessed? Are t access e.g. third party ownership?	here any restrictions that may prevent

Please specify known designations (ecological / environmental / historical) o or around the proposed site	n
Current land use	
Signature	
Date 03/03/2023	

Thank you for completing this response form.





HIGH PEAK LOCAL PLAN EARLY ENGAGEMENT RESPONSE FORM

Responses invited from 19th January 2023 to 5pm on 3rd March 2023

The Local Plan sets out detailed policies and specific proposals for the development and use of land in High Peak (outside of the Peak District National Park). Your feedback will help the Council to identify the issues and options for the Local Plan for consultation later in 2023.

Your Contact Details:

1 4 1 4 1 4 1 4 1 4 1 4 1 4 1 4 1 4 1 4	Personal details	Agent's details (if applicable)
Title	Mrs	
Name	E. Sweeney Smith	
Job title (if applicable)		
Organisation (if applicable)		
Address		
Post code		
Telephone no.		Do NOT make Public
Email address		DO NOT MAKE

PLEASE NOTE that responses must be attributable to named individuals or organisations. They will be held by the Council and will be available to view publicly and cannot be treated as confidential. Your contact details will not be published, but your name and organisation (if relevant) will. High Peak Borough Council maintains a database of consultees who wish to be kept informed about the Local Plan. Details of our data protection and Privacy Notice can be found on the council's website at: https://www.highpeak.gov.uk/YourData

Please complete and return this form by **5pm** on **3rd March 2023** by email to: ldf@highpeak.gov.uk; or

by post to: Planning Policy, High Peak Borough Council, Town Hall, Buxton, Derbyshire, SK17 6EL

Alternatively, you can respond online on the Local Plan consultation website https://highpeak-consult.objective.co.uk/kse.

Question 1 Do you agree wi from the new ev (please select on	idence?	initial view of th	ne emerging issu	es identified
Yes No If not, why?				
			h mean	2
			make t	his

Question 2						
Should the r	next Local P	lan hav	e a i	new	Spatial	Vision?
(please selec						

Yes	V
No [
	·

If so, what should it say?

To protect denhance fight kind of provision for	F
ements distinctive character of each town,	,
relace hander of Peak District so	
land dove opments the	
take up green space which are the best way to delineate differit communities.	
way to delineate different communities.	

Question 3 What should be the Strategic Objectives for the next Local Plan?

To provide appropriate all residents especially population of CEL Council admission that	F. Given the CELF has a below
eldery residents - this s Support for small busi	nestes.
Remove parking restrict It is forcing people local business	away from

Question 4

Are there any other policies in the Local Plan that you think should be updated? (please select one answer)

Ye	s	ì	
		_	ı
No			

Please specify which policy and how it should be updated.

be given	to suppo	to for	Youngs	les NHS Emer Lors (Police	service, gency e/fire)
Question 5 Are there any include? (please select	other new poli one answer)	cies that you	think the n	ext Local Pla	an should
Yes 🔽					

Please specify what the new policy should seek to address and why.

Obligation to ensure safety/protection of existing green spaces hadgerous, trees bio-diversity networks and to seek to create further corndons of natural habitats.

With current time restrictions on use of CELF Leisure centre (residents having to travel outside using fivel/carbontootpant) protection of Green spaces is a cost-free way for provision of healthy outdoor exercise.

Question 6

No

What other evidence should the Council consider to inform the next Local Plan?

Evidence to be taken into consideration is
Intol man the
decesions on developments which are
an acrespination and
denergia fra de barno of CELF Senior
conducive to well-being of CELF Senior
Conducive to well with 2 wings Citizens - purpose built with 2 wings So easy transition for elderley when
co early transition for ein
so oursing core needed. This would
more music) comployment for local for
so easy transition to ended. This would more nursing core needed. This would create more employment for local folk create more employment for local folk existing care-homes in CFLF are trying to Existing care-homes in CFLF are trying to
Freeting care-homes in Couraire and adapted
existing and service but in old with
Existing care-homes in certaine of adapted provide a good service but in old adapted frouses.
The state of the s

Question 7 & 8 Do you have any site suggestions for housing and / or employment? 00000

If you would like to suggest several sites, please submit a separate form for each one.

What is your interest (please select all that a			
Owner of the site			
Parish / Town Council			
Local resident			
Amenity / Community	Group		
Planning Consultant			

Land Agent						
.Developer						
•						
Other						
Olliel						
04 ()						
Other (please s	pecity)					
				•		
Are you the sol	e or part owne	er of the s	ite?			
(please select or	ne answer)	J. J. G. G. G.				
Sole Owner						
Sole Owner						
Part Owner						
N1-14-						
Neither						
16		4.				
If you are not the name, addre	e landowner (or the site	is in mu	Iltiple ow	nership, (s) in th	please submi
provided		ot actans	Of the la	na owner	(5) 111 (11)	s Space
	· · · · · · · · · · · · · · · · · · ·					
			*			
		•				
· · · · · · · · · · · · · · · · · · ·						
If not the landov	vner I confirm	າ that the	landown	arle have	hoon in	formed of this
If not the landov site submission		1 that the	landown	er/s have	been in	formed of this
If not the landov site submission (please select on		1 that the	landown	er/s have	been in	formed of this
site submission		1 that the	landown	er/s have	been in	formed of this

No			·		
Does the owne (please select or	r(s) support the ne answer)	developmen	t of the site		
Yes					
No					
Site location (ir	ncluding grid re	ference and	postcode if I	(nown)	
Site Area (hect	ares)				
Current Land U	lse(s) e.g. agric	ulture, emplo	yment, unus	sed/vacant etc	
Type of site e.g	յ. greenfield, pre	eviously dev	eloped land/	brownfield	
×		: ' '	As the second of		

Please provi	de a site plan cle	arly identif	ying the ex	act bounda	ries of the s	site.
	iture Uses & Pote t all that apply)	ential Site (Capacity (p	lease specif	у)	
Housing Employment						
Mixed-use (pl	lease specify uses	s)				
					1	
Basic Capac	ustom-build housi ity Information – ed floorspace		er of dwell	ings/numbe	r of	
indicate wha	est - please choo t level of market t all that apply)					•
Site is owned	by a developer					
Site is under	option to a develo	per				
Enquiries rec	eived/ strong inter	est				
Site is current	tly being marketed	1			- '	

None	
Not Known Comments on market interest	
Utilities - Please tell us which of the followin (please select all that apply)	ng utilities are available to the site
Mains water supply	
Mains sewerage	
Electric supply	
Gas supply	
Public highway	
Landline telephone/broadband internet	
Public Transport	
Other (please specify)	

Utilities – comments	
Constraints - Please tell us which of the following constraints are applicable t the site (please select all that apply)	0
Land in other ownership must be acquired to enable the site to be developed	
Restrictive covenants exist	
Current land use(s) need to be relocated	
Physical constraints (topography, trees, other)	
Flood Risk	
Infrastructure required	
Public rights of way cross or adjoin the site	
Land contamination	
Access constraints	
Environmental constraints	

Please provide any relevant information above constraints	of likely measures to overcome the
Timescales - Please indicate the approxibecome available for development (please select one answer) Immediately	imate timescale for when the site will
Up to 5 years	
5 - 10 years	
10 – 15 years	
Beyond 15 years	
Unknown	

Timescales comments – particularly if you have indicated that the site is not immediately available, please explain why
Other Relevant Information – Please use the space below for additional information
Question 9
Do you have any site suggestions for Local Green Spaces?
If you would like to suggest several sites, please submit a separate form for each one.
Site location (including grid reference and postcode if known)

)						
is the site	in reasona	ably close	proximity	to the com	munity it se	,1 V C
is the stre		ably close	proximity	to the com		
is the ste	in reasona	ably close		to the com		
	in reason	ably close		to the com		
	in reason			to the com		

Local Significance - Is the site demonstrably special to a local community and holds a particular local significance, e.g. due to its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife?

	요 아이는 아이는 이 나는 그들은 얼마를 하는 것 같아.
3. 10 1 1 1 1 1	
Size / Scale - is the site loc	al in character and not an extensive tract of land?
	보다 그 그들은 그리고 이 하고 말라고 있는데 그리고 되었다. 그리고 있는데
	일하는 경기도 하는 그리고 돈을 받을 것 같습니다. 그는 그를 모양하다
	는 CT - 그는 CD - 10 - 일일 때문문 하고 있다면 모르는 모르겠다고 하다.
	그리는 그리다 하는 사람들은 바람들은 얼마를 가는 것을 다시다니?
	그는 하는 그리고 그리라는 사회를 받는 얼마를 모든 살라고 있다.
	The state of the s
f possible, please provide	photographs of the site that support your
- poodible, ploade provide	photographs of the site that support your
comments.	
	· 1866年18日本 1866年18日本 1868年18日本 1868年18年末 1868年18日本 1868年18年末 1868年18日本 1868年18年末 186

Question 10 Do you have any site suggestions for ecological improvements? If you would like to suggest several sites, please submit a separate form for each one. Site location (including grid reference and postcode if known) Please provide a site plan clearly identifying the exact boundaries of the site. Do you own the site? (please select one answer) Yes (full ownership) Yes (part ownership) No Please specify if you also own/control adjacent land.

	site be accessed? Are there any restrictions that may prevent third party ownership?
Please speci	ify the current land use.
If the land is	in any existing ecological schemes, please specify until when.
	de any details of factors affecting the site (e.g. flooding issues, notable species possibly present on site etc.)

Question 11 Do you have any site suggestions for renewable energy?

Please p	rovide a s	site plan cle	early identify	ing the exac	: boundaries c	of the site.
			type and sca nt to hub (m)		development	(Capacity
Do you o	own the s	ite? answer)				
Yes (full	ownership	ソ :				

				$L_{k_{1}} \leq L_{k_{1}} \leq 2 \sqrt{k_{1}}$		
•						
	1					
ease spec	ifv know	n designat	ions (ecolo	aical / enviro	nmental / histor	ical) o
around th	ne propos	sed site				ioui, o
				似的 拼音		
ırrent land	l use (inc	luding agr	icultural lan	d quality rat	ing if relevant)	
rrent land	d use (inc	luding agr	icultural lan	d quality rat	ing if relevant)	
rrent lanc	d use (inc	luding agr	icultural lan	d quality rati	ing if relevant)	
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				d quality rati	ing if relevant)	
				d quality rati	ing if relevant)	
				d quality rati	ing if relevant)	

included in the Lo	
What use is the s	ite proposed for?
Site location (inc	luding grid reference and postcode if known)
Please provide a	site plan clearly identifying the exact boundaries of the site
Do you own the	site?
(please select one	e answer)
Yes (full ownershi	ip)
Yes (part owners)	hip)
No	

How can the site be accessed? Are there access e.g. third party ownership?	any restrictions that may prevent
Please specify known designations (eco	logical / environmental / historical) on
or around the proposed site	
Current land use	
Signature	
Date 1\3\23	

20

Thank you for completing this response form.



Comment

Consultee Mr Paul TATTAM (1334911)

Email Address

Address

Event Name High Peak Local Plan - Early Engagement

Comment by Mr Paul TATTAM (1334911)

Comment ID LPEA63

Response Date 01/03/23 14:07

Consultation Point Question 1 (View)

Status Submitted

Submission Type Web

Version 0.11

Question 1

Do you agree with the Council's initial view of the emerging issues identified from the new evidence?

Question 2

Should the next Local Plan have a new Spatial Vision? No

Question 3

What should be the Strategic Objectives for the next Local Plan?

The local plan must take account of the problems outlined in (inter alia) The Health Survey for England (2021)

See: https://digital.nhs.uk/data-and-information/publications/statistical/health-survey-for-england/2021# and thus it is imperative that "Promoting Healthy and Sustainable Communities" should be a major priority/strategic aim. In order to make progress on these aims/objectives, action should dovetail with should dovetail with the "Vision Derbyshire Climate Change Guidance (2022)"

Background

- * the degree to which ill health across the UK is caused by inactivity and living in unhealthy conditions is at crisis point, and has been for some years
- * Continuing to live in this way is currently creating and *will in future create* unsustainable pressures on the NHS

- * local councils can help alleviate this crisis in many sectors of their policies/initiatives
- * councils can help ease pollution and congestion in their areas by enabling people to travel to work, leisure and community facilities without using a motor vehicle and thus sustainable walking and cycling routes must be properly funded. Support for bus travel and support for the encouragement must be a part of this policy.

Example (SO10): To protect existing, and support the delivery of new services, facilities and infrastructure that improve accessibility and connectivity.

Chinley as regards SO10 provides the ideal example of how safe walking for families with young chidren can be enhanced by developing - in cooperation with DCC and local land owners - a properly surfaced walking route from the new housing at Forge Manor to a point close to Chinley Primary School. The current absence of a proper path encourages huge congestion on Buxton Road, dangerous walking environments on Green Lane Chinley and ever increasing motorised traffic.

This issue can also be seen as part of SO11: "To promote opportunities for healthy lifestyles and support developments that minimise risks to health"

As regards the Vision Derbyshire Climate Change Guidance....

- . Mitigate pollution of the air, land and water, including noise and light pollution. In **Chinley** consideration could be give to making the whole village a 20mph zone. This would extend from the bridge at the beginning of the Hayfiled Road, up to and including Whitehough and to the end of the village where Lower Lane meets the boundary with Buxworth
- . Contribute to the health and wellbeing of communities and natural systems. See above re **footpath from Forge Manor to Buxton Road**
- . Facilitate transport choices, prioritising demand reduction, active travel and modal shift to other clean alternatives such as public transport,. There should be more work done **in association** with DCC and the DfT to help fund the improvements needed at Chinley Station now that a Network Rail GRIP study has identified the feasibility of the buildbuilding lifts in order to facilitate step-free access. This work would massively help the achievement of modal shifts from/to Chinley station for ALL rail uses

Question 4

Are there any other policies in the Local Plan that you No think should be updated?

Question 5

Are there any other new policies that you think the No next Local Plan should include?

Question 6

What other evidence should the Council consider to inform the next Local Plan?

The Council should consider all relevant evidence as regards the healthiness or otherwise of the High Peak population, the ease of access or otherwise of the population to places of work, leisure, community/medical facility

Question 7 & 8

If you would like to suggest several sites, please submit a separate form for each one.

What is your interest in the site? (please tick all that apply)

Proposed Future Uses & Potential Site Capacity (please specify)

Market interest - please choose the most appropriate category below and indicate what level of market interest there is/has recently been in the site.

Utilities - Please tell us which of the following utilities are available to the site (please tick all that apply)

Constraints - Please tell us which of the following constraints are applicable to the site (please tick all that apply)



Comment

Consultee Tom Clarke MRTPI (1333848)

Email Address

Company / Organisation Theatres Trust

Address

Event Name High Peak Local Plan - Early Engagement

Comment by Theatres Trust (Tom Clarke MRTPI -

1333848)

Comment ID LPEA16

Response Date 13/02/23 17:32

Consultation Point Question 5 (View)

Status Submitted

Submission Type Web

Version 0.3

Question 4

Are there any other policies in the Local Plan that you think No should be updated?

Please specify which policy and how it should be updated.

Policy CF5 of the existing Local Plan resists the loss of existing facilities including performing arts venues, of which there are a few across High Peak. We recommend this policy is retained within the new or revised Local Plan.

Question 7 & 8

If you would like to suggest several sites, please submit a separate form for each one.

What is your interest in the site? (please tick all that apply)

Proposed Future Uses & Potential Site Capacity (please specify)

Market interest - please choose the most appropriate category below and indicate what level of market interest there is/has recently been in the site.

Utilities - Please tell us which of the following utilities are available to the site (please tick all that apply)

Constraints - Please tell us which of the following constraints are applicable to the site (please tick all that apply)



HIGH PEAK LOCAL PLAN EARLY ENGAGEMENT RESPONSE FORM

Responses invited from 19th January 2023 to 5pm on 3rd March 2023

The Local Plan sets out detailed policies and specific proposals for the development and use of land in High Peak (outside of the Peak District National Park). Your feedback will help the Council to identify the issues and options for the Local Plan for consultation later in 2023.

Your Contact Details:

	Personal details	Agent's details (if applicable)
Title		
Name	Karen Thorne	
Job title (if applicable)		
Organisation (if applicable)		
Address		
Post code		
Telephone no.		
Email address		

PLEASE NOTE that responses must be attributable to named individuals or organisations. They will be held by the Council and will be available to view publicly and cannot be treated as confidential. Your contact details will not be published, but your name and organisation (if relevant) will. High Peak Borough Council maintains a database of consultees who wish to be kept informed about the Local Plan. Details of our data protection and Privacy Notice can be found on the council's website at: https://www.highpeak.gov.uk/YourData

Please complete and return this form by **5pm** on **3rd March 2023**

by email to: ldf@highpeak.gov.uk; or

by post to: Planning Policy, High Peak Borough Council, Town Hall, Buxton,

Derbyshire, SK17 6EL

Alternatively, you can respond online on the Local Plan consultation website https://highpeak-consult.objective.co.uk/kse.

Question 1 Do you agree with the Council's initial view of the emerging issues identified from the new evidence? (please select one answer)
Yes
If not, why?
Question 2 Should the next Local Plan have a new Spatial Vision? (please select one answer)
Yes No
NO LIII If so, what should it say?

The council plans need to account for infrastructure provision before granting any further planning for housing. In Glossopdale and Hadfield we have an intolerable situation of no Dentists and GPs with high patient ratios. The road infrastructure is inadequate to the point of it being dangerous as we have no hospital and an average drive time of 30 minutes to the nearest A&E. Traffic buildup is constant with jams from 7 a.m. to 19.30 daily. We have insufficient school places having been 200 place deficient just as our new school was built and having a further building works done we now havec400+ houses being built meaning we will again have a shortage of places.

Question 3 What should be the Strategic Objectives for the next Local Plan?

The strategic plan for Glossopdale and Hadfield should state that until we have sufficient school places, GPs, Dentists and medical facilities we will not allow further housing planning permissions passed.	pla
High Peak will ensure strategic planning will place infrastructure development ahead of further housing plans. The Council will ensure infrastructure will be in place and have the overhead prior to each planning approval.	hou
The strategic objective should be to build a new village to lessen the impact on current villages and towns providing their own infrastructure and services. This would be bid on by construction companies and should be 50% affordable housing.	and
Question 4	Que
Are there any other policies in the Local Plan that you think should be updated? (please select one answer)	upd
Yes	Yes
Vo	No

Please specify which policy and how it should be updated.
Overtion 5
Question 5 Are there any other new policies that you think the next Local Plan should
include? (please select one answer)
Yes
YES
No
Please specify what the new policy should seek to address and why.
High Peak should prioritize the infrastructure as a primary concern.
High Peak should employ a bid firm to ensure success in bidding for levelling up funds for the Talbot Rd site, using the 100k given for bid creation.
High Peak should not be building on greenfield sites.

Question 6

What other evidence should the Council consider to inform the next Local Plan?

The council should only be approving plans where there is sufschool places, GPs, Dentists and increased traffic numbers. Meevidence that your current residents have the facilities require houses and each time plans are approved place a community etc can be provided for the new community and if not used for decide what the use is.	ake decisions based on the ed before planning anymore facility in them so GPs, Dentists
Question 7 & 8 Do you have any site suggestions for housing and	d / or employment?
If you would like to suggest several sites, please subrone.	mit a separate form for each
What is your interest in the site? (please select all that apply)	
Owner of the site	
Parish / Town Council	
Yes Local resident	
Amenity / Community Group Yes	
Planning Consultant	

Land Agent	
Developer	
Yes Other	
Other (please specify)	
Talbot Rd site developed into a community hub.	
Are you the sole or part owner of the site? (please select one answer)	
Sole Owner	
Part Owner neither	
Neither	
If you are not the landowner or the site is in muthe name, address and contact details of the la provided	
Yourselves	
If not the landowner, I confirm that the landowr	ner/s have been informed of this
site submission (please select one answer)	
Yes	

No	
Does the owner(s) support the development of the site? (please select one answer)	
Yes	
No	
Site location (including grid reference and postcode if known)	
Talbot Rd site the subject of another failed bid. Employ a firm using your 100k the site and engage companies to quote.	and draw plans for
Site Area (hectares)	
Current Land Use(s) e.g. agriculture, employment, unused/vac	ant etc.
Unused ex school site	
Type of site e.g. greenfield, previously developed land/brownfi	eld
. Jpo of old olg. grounding, proviously developed idilu/browning	

Please provide a site plan clearly identifying the exact bo	undaries of the site.
Proposed Future Uses & Potential Site Capacity (please s (please select all that apply)	specify)
Housing	
Employment	
Mixed-use (please specify uses)	
Self-build & custom-build housing	
Basic Capacity Information – area/number of dwellings/n units/proposed floorspace	umber of
Market interest - please choose the most appropriate cate indicate what level of market interest there is/has recently (please select all that apply)	
Site is owned by a developer	
Site is under option to a developer	
Enquiries received/ strong interest	
,	

None	х
Not Known	
Comments on market interest	
Utilities - Please tell us which of the following utilities are a (please select all that apply)	available to the site
Mains water supply	
Mains sewerage	
Electric supply	
Gas supply	
Public highway	
Landline telephone/broadband internet	
Public Transport	
Other (please specify)	

Utilities – comments	
Constraints - Please tell us which of the following constraints are the site	applicable to
(please select all that apply)	
Land in other ownership must be acquired to enable the site to be deve	eloped
Restrictive covenants exist	
Current land use(s) need to be relocated	
Physical constraints (topography, trees, other)	
Flood Risk	
Infrastructure required	
Public rights of way cross or adjoin the site	
Land contamination	
Access constraints	

Environmental constraints

Please provide any relevant information of likely measures to overcome the above constraints		
Timescales - Please indicate the approximate timescale for become available for development (please select one answer)	when the site will	
Immediately		
Up to 5 years		
5 - 10 years		
10 – 15 years		
Beyond 15 years		
Unknown		

Timescales comments – particularly if you have indicated that the site is not immediately available, please explain why
Other Relevant Information – Please use the space below for additional information
Question 9
Do you have any site suggestions for Local Green Spaces?
If you would like to suggest several sites, please submit a separate form for each one.
Site location (including grid reference and postcode if known)
Rough Fields Padfield currently used by many residents.

Please provide a	site plan clearly ide	ntifying the e	xact bounda	iries of the s	ite.
ocation - Is the s	site in reasonably c	lose proximit	y to the com	munity it ser	ves
Used by local reside	nts and walkers.				

Local Significance - Is the site demonstrably special to a local community and holds a particular local significance, e.g. due to its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife?

This is a green space between communities private and social that allows for community inclusion and mixing of youngsters.
Size / Scale - Is the site local in character and not an extensive tract of land?
This is a large piece of green space used every day by the community
If possible, please provide photographs of the site that support your comments.

Question 10

Do you have any site suggestions for ecological improvements?

If you would like to suggest several sites, please submit a separate form for each one.

ostcode if known)
the exact boundaries of the site
x
ent land.

How can the site be accessed? Are there any restrictions that may preven access e.g. third party ownership?	t
Please specify the current land use.	
Communities green space	
If the land is in any existing ecological schemes, please specify until wher	ղ.
Please provide any details of factors affecting the site (e.g. flooding issues topography, notable species possibly present on site etc.)	s,

Question 11

Do you have any site suggestions for renewable energy?

If you would like to suggest several sites, please submit a separate form for each one.

Site location (including grid reference and postcode if known)

Utilize the waterways to create green energy using	turbines to provide for local housing.
Create a strategic plan for the future nuclear power the Pennine way.	r plant to be planned for upland build along
Please provide a site plan clearly identifyi	ing the exact boundaries of the site.
Please specify the proposed type and sca (MW), Height to tip (m), Height to hub (m))	
Do you own the site? (please select one answer)	
Yes (full ownership)	
Yes (part ownership)	
Vo	

How can the site be accessed? Are there any restrictions that access e.g. third party ownership?	may prevent
Please specify known designations (ecological / environmenta or around the proposed site	ıl / historical) oı
Current land use (including agricultural land quality rating if re	elevant)
Moorlands, farming	
Proposed grid connection point (if known)	

Do you have any site suggestions for other uses that you think should be included in the Local Plan? What use is the site proposed for? Site location (including grid reference and postcode if known) Pennine way Please provide a site plan clearly identifying the exact boundaries of the site. Do you own the site? (please select one answer) Yes (full ownership) Yes (part ownership) No

Question 12

How can the site be accessed? Are there any restrictions that may prevent access e.g. third party ownership?	
Please specify known designations (ecological / environmental / historical) on or around the proposed site	
Current land use	
Signature K. Thorne	
Date 21/02/2023	

Thank you for completing this response form.

Hi,

As q12 asked about 'other uses' I was of the opinion that firstly the Pennine way and it's farmers are being encouraged by central government to diversify and subsidies cut and I think that local government should support these farmers to reach their goals by way of planning approval for their new enterprise which in turn would bring economic growth to the area.

I think we should encourage further green energy creation in the Pennines by using the reservoirs to generate solar power but not having experience in who owns the land I don't know how this could be delivered.

We should make more of our market towns as Bakewell have and hold monthly outdoor events. As we have little infrastructure/facilities in the towns and villages we live in and struggle to change them we should think differently and look to create new communities which would be planned and approved prior to placing to tender this would allow LGAs to dictate facilities and infrastructure giving new communities everything they need and lessen the impacts on current places. Finally to encourage Derbyshire and Yorkshire to utilize the Pennine Way and create a strategic plan for small nuclear plants (SFRs or VHTRs) placed along the backbone of the country in places that are sparse in population but that provide high paid jobs. I'm really asking that although I know LGAs have little funds spare that we think differently, bigger, collaborate and always put infrastructure first as with infrastructure comes everything else, jobs, people, communities and economic growth.

On 21 Apr 2023 at 14:44, LDF < ldf@highpeak.gov.uk > wrote:

Dear Mrs Thorne

You may recall recently commenting on the High Peak Local Plan Early Engagement Document by completing the attached comments form.

We are currently reviewing the responses received and have a query about your answer to Question 12.

We note that you have responded 'Pennine Way' in response to site suggestions for other uses you think should be included in the Local Plan.

Are you able to elaborate on this response please? The intention of the question is to invite respondents to let the Council know of any sites which they think should be designated in the Local Plan and for what use.

If you have anything further to add, please could you respond by Friday 28th April.

Many thanks

Planning Policy Team



HIGH PEAK LOCAL PLAN EARLY ENGAGEMENT RESPONSE FORM

Responses invited from 19th January 2023 to 5pm on 3rd March 2023

The Local Plan sets out detailed policies and specific proposals for the development and use of land in High Peak (outside of the Peak District National Park). Your feedback will help the Council to identify the issues and options for the Local Plan for consultation later in 2023.

Your Contact Details:

	Personal details	Agent's details (if applicable)
Title	Miss	124 4 75
Name	Charlotte Strickland	
Job title (if applicable)	Clerk to the Council	
Organisation (if applicable)	Tintwistle Parish Council	12
Address		
Post code		
Telephone no.		
Email address		

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Please complete and return this form by 5pm on 3rd March 2023

by email to: Idf@highpeak.gov.uk; or

by post to: Planning Policy, High Peak Borough Council, Town Hall, Buxton,

Derbyshire, SK17 6EL

Alternatively, you can respond online on the Local Plan consultation website https://highpeak-consult.objective.co.uk/kse.

Question 1

Do you agree with the Council's initial view of the emerging issues identified

from	the new evidence? se select one answer)
Yes	
No	x

If not, why?

This response is on behalf of Tintwistle (and Crowden) Parish Council.

We believe there is insufficient reference to village settlements. Although Tintwistle is described as a 'large village' it is not; it is grouped in with Glossopdale and Hadfield, both of which have considerably larger populations with very different needs. Above all, Tintwistle and Crowden want to preserve their distinctiveness and their rural character. Further housing development will mitigate against this vision and, therefore, some of the emerging issues identified in the new evidence raise concerns.

Question 2 Should the next Local Plan have a new Spatial Vision? (please select one answer)

Yes	Х	
No		-

If so, what should it say?

The revised 'Spatial Vision' (the Councillors expressed that this is not helpful terminology for non-planners) should provide more information on how the vision will be achieved.

Whilst we endorse objectives such as "protection and enhancement of areas of green space around settlements, improvements to transport facilities, ensuring that all new development contributes to local distinction and sense of place", this has not been the Tintwistle and Crowden experience of developments, or lack of, since 2016.

Tintwistle Parish Council is the first Parish Council in Derbyshire to join The Wild Peak Network. As such, it is seeking to increase biodiversity, be a part of nature recovery networks and connected spaces according to Lawton principles. The Council is funding an opportunity mapping exercise which will preclude further housing development but will make a strong contribution to combatting the impact of climate change, as desired by HPBC.

Question 3 What should be the Strategic Objectives for the next Local Plan?

plan as to how this can be achieved.
It should include: how the transport infrastructure will be improved, how small scale commercia enterprises will be supported, how any housing development will not encroach on our local distinction, how cultural building will be maintained and enhanced and how any tourism related initiatives will be supported. There should also be a consideration for maintaining existing and creating further Green Spaces.
Question 4
Quosion 4
Are there any other policies in the Local Plan that you think should be updated? (please select one answer)
updated?
updated? (please select one answer)

Question 5 Are there any other new policies that you think the next Local Plan should include? (please select one answer)

Yes	Х	
No		

Please specify what the new policy should seek to address and why.

If HPBC wants to encourage and support tourism initiatives this should be a stand alone policy with well thought through and consulted on objectives; it is also important that these objectives are appropriate to small settlements as well as the traditional tourism hubs, such as Buxton.

Question 6

What other evidence should the Council consider to inform the next Local Plan?

HPBC could formally consult with its Parish Councils to get a clear understanding of what small settlements need and aspire to for future generations.

The questions in the Response form do not lend themselves to villages such as Tintwistle and Crowden, therefore, an opportunity has not been provided to allow them to voice views pertinent to their residents and areas.

Question 7 & 8 Do you have any site suggestions for housing and / or employment?

If you would like to suggest several sites, please submit a separate form for each one.

What is your interest in the site? (please select all that apply)	
Owner of the site	
Parish / Town Council	
Local resident	
Amenity / Community Group	
Planning Consultant	
Land Agent	
Developer	
Other	
Other (please specify)	

Are you the sole or part owner of the site?

(please select one answer)

Sole Owner	
Part Owner	
Neither	
If you are not the landowner or the site is in multiple own the name, address and contact details of the land owner provided	
If not the landowner, I confirm that the landowner/s have site submission (please select one answer)	been informed of this
Yes	
No	
Does the owner(s) support the development of the site? (please select one answer)	
Yes	
No	

Site location (including grid reference and postcode if known)
Site Area (hectares)
Current Land Use(s) e.g. agriculture, employment, unused/vacant etc.
Type of site e.g. greenfield, previously developed land/brownfield
Please provide a site plan clearly identifying the exact boundaries of the site.

Proposed Future Uses & Potential Site Capacity (please specify) (please select all that apply)

Housing			
Employment			
Mixed-use (please specify uses)			
Self-build & custom-build housing			
Basic Capacity Information – area/number of dwellings/number of units/proposed floorspace			
Market interest - please choose the most appropriate category below and indicate what level of market interest there is/has recently been in the site. (please select all that apply)			
indicate what level of market interest there is/has recently			
indicate what level of market interest there is/has recently			
indicate what level of market interest there is/has recently (please select all that apply)			
indicate what level of market interest there is/has recently (please select all that apply) Site is owned by a developer			
indicate what level of market interest there is/has recently (please select all that apply) Site is owned by a developer Site is under option to a developer			
indicate what level of market interest there is/has recently (please select all that apply) Site is owned by a developer Site is under option to a developer Enquiries received/ strong interest			

Comments on market interest

Utilities - Please tell us which of the following uti (please select all that apply)	ilities are available to the site
Mains water supply	
Mains sewerage	
Electric supply	
Gas supply	
Public highway	
Landline telephone/broadband internet	
Public Transport	
Other (please specify)	
Utilities – comments	

Constraints - Please tell us which of the following constraints are applicable to the site (please select all that apply) Land in other ownership must be acquired to enable the site to be developed Restrictive covenants exist Current land use(s) need to be relocated Physical constraints (topography, trees, other) Flood Risk Infrastructure required Public rights of way cross or adjoin the site Land contamination Access constraints Environmental constraints Please provide any relevant information of likely measures to overcome the above constraints

Timescales - Please indicate the approximate timescale for become available for development (please select one answer)	or when the site will	
Immediately		
Up to 5 years		
5 - 10 years		
10 – 15 years		
Beyond 15 years		
Unknown		
Timescales comments – particularly if you have indicated that the site is not immediately available, please explain why		

Other Relevant Information – Please use the space below for additional information			
Question 9			
Do you have any site suggestions for Local Green Spaces?			
If you would like to suggest several sites, please submit a separate form for each one.			
Site location (including grid reference and postcode if known)			
Please provide a site plan clearly identifying the exact boundaries of the site.			

Local Significance - Is the site demonstrably special to a local community an nolds a particular local significance, e.g. due to its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife?			ose proximity to the	e community it serves
holds a particular local significance, e.g. due to its beauty, historic significance, recreational value (including as a playing field), tranquillity or				
holds a particular local significance, e.g. due to its beauty, historic significance, recreational value (including as a playing field), tranquillity or				
holds a particular local significance, e.g. due to its beauty, historic significance, recreational value (including as a playing field), tranquillity or				
holds a particular local significance, e.g. due to its beauty, historic significance, recreational value (including as a playing field), tranquillity or				
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holds a particular local significance, e.g. due to its beauty, historic significance, recreational value (including as a playing field), tranquillity or				
holds a particular local significance, e.g. due to its beauty, historic significance, recreational value (including as a playing field), tranquillity or				
	holds a particular le significance, recrea	ocal significance, ational value (incl	e.g. due to its beau	ty, historic

OIEG / Ocaic	s the site local in character and not an extensive tract of land
f possible, pl	ease provide photographs of the site that support your
Question 10	
Do you have a	any site suggestions for ecological improvements?
lf you would lik one.	e to suggest several sites, please submit a separate form for each
Site location (including grid reference and postcode if known)

Todoo provide a cito pian	n clearly identifying the exact boundaries of the s	
Do you own the site? (please select one answer)		
Yes (full ownership)		
Yes (part ownership)		
No		
Please specify if you also	o own/control adjacent land.	
How can the site be acces access e.g. third party ow	ssed? Are there any restrictions that may prever vnership?	ıt
Please specify the curren	nt land use.	

If the land is in any existing ecological schemes, please specify until when.		
ase provide any details of factors affecting the site (e.g. flooding issues, ography, notable species possibly present on site etc.)		
estion 11 you have any site suggestions for renewable energy?		
ou would like to suggest several sites, please submit a separate form for each		
e location (including grid reference and postcode if known)		

Please provide a site plan clearly identifying	the exact boundaries of the site.	
Please specify the proposed type and scale of (MW), Height to tip (m), Height to hub (m))	of energy development (Capacity	
Do you own the site? (please select one answer)		
Yes (full ownership)		
Yes (part ownership)		
No		
How can the site be accessed? Are there any restrictions that may prevent access e.g. third party ownership?		

Please specify known designations (ecological / environmental / historical) on or around the proposed site
Current land use (including agricultural land quality rating if relevant)
Proposed grid connection point (if known)
Question 12 Do you have any site suggestions for other uses that you think should be included in the Local Plan?
What use is the site proposed for?

Site location (including grid reference and postcode if known)

Please provide a site plan clearly ide	entifying the exact boundaries of the site
o you own the site?	
olease select one answer)	
es (full ownership)	
es (part ownership)	
lo	
low can the site be accessed? Are to cess e.g. third party ownership?	there any restrictions that may prevent

Please specify known designations (ecological / environmental / historical) on or around the proposed site		
Current land use		
Signature		
Date <u>03rd March 2023</u>		

Thank you for completing this response form.



Comment

Address

Consultee Ms Jane Reynolds (1334773)

Email Address

Company / Organisation Transition Buxton

Event Name High Peak Local Plan - Early Engagement

Comment by Transition Buxton (Ms Jane Reynolds - 1334773)

Comment ID LPEA56

Response Date 28/02/23 16:31

Consultation Point Question 1 (View)

Status Submitted

Submission Type Web

Version 0.41

If not, why?

We see that housing, employment and population are identified as major emerging issues, but it would be useful to see an explicit link to the causes of these issues. For example, the age-imbalance of the population is at least in part caused by the lack of affordable housing and poor public transport provision, especially before 7.30am and after 5pm.

The climate change and biodiversity loss are recognised as emerging issues and we can see that for biodiversity the metric of 10% net gain is used. What metrics are to be used to measure success on tackling the climate crisis? Clear, measurable targets are needed in all areas that affect emissions.

Question 2

Should the next Local Plan have a new Spatial Yes Vision?

If so, what should it say?

We would welcome a spatial vision for Buxton that takes into account the aspirations of people who have taken part in the Big Buxton Conversations as well as looking into the changes needed to address the age-imbalance in the town and taking into account changes brought about by the pandemic:

- Attract and retain young people and entrepreneurs which will help provide a self-sustaining economy and protect the future vibrancy of the town.
- Provision of workspace hubs where people who are self-employed or working remotely can access shared resources and avoid isolation.

- . 15 minute neighbourhoods where most daily necessities and services, such as work, shopping, education, healthcare, and leisure activities are easily reached within a 15-minute walk or cycle ride reducing car dependency and promoting low car and car share.
- . Improved public transport within the town, to other towns and villages in the borough as well as to the cities of Manchester and Sheffield.
- . Implementation of plans to support safe and pleasant walking and cycling in Buxton.
- . Mapping, protection and regeneration of nature corridors through the town, providing climate resilience, enhancing biodiversity, and promoting wellbeing.

Question 3

What should be the Strategic Objectives for the next Local Plan?

- . Make climate and nature resilience a key test for all proposed developments.
- Have ambitious targets for upgrading energy efficiency in existing housing stock, including buildings in conservation areas.
- . Raise requirements for energy efficiency and other sustainability metrics in all new builds.
- . Include targets for inclusion of renewable energy generation in new housing developments
- . Include a comprehensive transport plan that
- allows for safe and pleasant walking and cycling within the borough
- is inclusive, supporting the needs of people who cannot use private cars, such as teenagers and people whose disability excludes them from driving
- enables visitors to move around without bringing extra traffic.

Please specify which policy and how it should be updated.

- . All the policies in the Local Plan need to be reviewed to include measurable progress indicators for combatting climate change and regenerating the natural environment.
- . Planning policy must be updated to enable requirement of minimum energy efficiency standards that exceed government standards. Many Local Authorities already do this and statements by ministers have confirmed the right of Local Authorities to enforce such requirements.
- Planning policy should also mandate other features that will increase resilience, including grey water recycling and community water source heat pumps.
- . New developments to be adequately served by public transport and safe walking and cycling routes, so that car use can be minimised allowing less space to be allocated to parking places and more to green areas.
- . Biodiversity must be protected in all developments. The provision for offsetting the biodiversity net gain requirement must not result in developments are reduced to biodiversity deserts. Wildlife corridors must be maintained throughout the town and the residents must have the opportunity to enjoy nature in their own neighbourhoods.
- . In general we support the prioritisation of development on brownfield rather than greenfield sites. However, research has shown that many brownfield sites that have been abandoned for some time are more biodiverse that land that has been farmed. Biodiversity impact studies should be done on such sites before allocating them for development. For this reason, the Hogshaw site should be withdrawn if at all possible.

Please specify what the new policy should seek to address and why.

An integrated transport policy that enables people to efficiently and safely use public transport in conjunction with walking and cycling.

Question 6

What other evidence should the Council consider to inform the next Local Plan?

- Land availability
- . Landscape/ heritage impact
- . Development viability
- . Strategic flood risk

- . Sustainability Assessment
- . Habitat's Regulations
- . Biodiversity impact studies including for brownfield sites
- . Transport connectivity

Question 7 & 8

If you would like to suggest several sites, please submit a separate form for each one.

What is your interest in the site? (please tick all that apply)

Proposed Future Uses & Potential Site Capacity (please specify)

Market interest - please choose the most appropriate category below and indicate what level of market interest there is/has recently been in the site.

Utilities - Please tell us which of the following utilities are available to the site (please tick all that apply)

Constraints - Please tell us which of the following constraints are applicable to the site (please tick all that apply)



HIGH PEAK LOCAL PLAN EARLY ENGAGEMENT RESPONSE FORM

Responses invited from 19th January 2023 to 5pm on 3rd March 2023

The Local Plan sets out detailed policies and specific proposals for the development and use of land in High Peak (outside of the Peak District National Park). Your feedback will help the Council to identify the issues and options for the Local Plan for consultation later in 2023.

Your Contact Details:

	Personal details	Agent's details (if applicable)
Title		
Name		
Job title (if applicable)	Treville Properties Ltd	
Organisation (if applicable)		Emery Planning Partnership
Address		
Post code		
Telephone no.		
Email address		

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Derbyshire, SK17 6EL

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Question 1 Do you agree with the Council's initial view of the emerging issues identified from the new evidence? (please select one answer)
Yes
No N
If not, why?
See attached statement
Question 2 Should the next Local Plan have a new Spatial Vision? (please select one answer)
Yes Y No
If so, what should it say?
To be determined once all background evidence to hand.

Question 3 What should be the Strategic Objectives for the next Local Plan?

Not applicable to these representations
Question 4
Are there any other policies in the Local Plan that you think should be updated?
(please select one answer)
Yes A
No

Please specify which policy and how it should be updated.

Question 5 Are there any other new policies that you think the next Local Plan include? (please select one answer)	should
Yes	
No	
Please specify what the new policy should seek to address and wh	y.
Not applicable to these representations	

Question 6

What other evidence should the Council consider to inform the next Local Plan?

Section 3 of the early engagement document, pages 21 to 30 list vor will be undertaken in order to inform the next Local Plan. The prior to the next stage of engagement and made publicly available.	ese reports should be finalised			
Question 7 & 8 Do you have any site suggestions for housing and / or employment?				
If you would like to suggest several sites, please submit a one.	a separate form for each			
What is your interest in the site? (please select all that apply)				
Owner of the site	Υ			
Parish / Town Council				
Local resident				
Amenity / Community Group				
Planning Consultant				

Land Agent	
Developer	
Other	
Other (please specify)	
Are you the sole or part owner of the site? (please select one answer)	
Sole Owner	
Part Owner	Υ
Neither	
If you are not the landowner or the site is in multip the name, address and contact details of the land provided	
D Spicer c/o agent	
If not the landowner, I confirm that the landowner/site submission (please select one answer)	s have been informed of this
Yes	Υ

No	
Does the owner(s) support the development of the site? (please select one answer)	
Yes	
No	
Site location (including grid reference and postcode if known)	
Land to the West of Linglongs Road, Taxal, Whaley Bridge (Grid reference - SK0038	(02)
Site Area (hectares)	
5.5	
Current Land Use(s) e.g. agriculture, employment, unused/vacant	etc.
Agriculture	
Type of site e.g. greenfield, previously developed land/brownfield	
Greenfield	

Please provide a sit	e plan clearly	identifying the	exact boundaries	of the site.

See attached	
Proposed Future Uses & Potential Site Capacity (please (please select all that apply)	specify)
Housing	Υ
Employment	
Mixed-use (please specify uses)	
Self-build & custom-build housing	
Basic Capacity Information – area/number of dwellings/units/proposed floorspace	number of
At least 110 dwellings	
Market interest - please choose the most appropriate ca indicate what level of market interest there is/has recent (please select all that apply)	
Site is owned by a developer	Y
Site is under option to a developer	
Enquiries received/ strong interest	
Site is currently being marketed	

None	
Not Known	
Comments on market interest	
Utilities - Please tell us which of the following utilities are a (please select all that apply)	available to the site
Mains water supply	Υ
Mains sewerage	Υ
Electric supply	Υ
Gas supply	Υ
Public highway	Υ
Landline telephone/broadband internet	Υ
Public Transport	Υ
Other (please specify)	

Utilities – comments

The land is adjacent to the existing housing and the settlement edge of Nonportunity to connect to existing utilities in the vicinity.	Whaley Bridge, with the
Constraints - Please tell us which of the following constra	ints are applicable to
(please select all that apply)	
Land in other ownership must be acquired to enable the site to	be developed
Restrictive covenants exist	
Current land use(s) need to be relocated	
Physical constraints (topography, trees, other)	
Flood Risk	
Infrastructure required	
Public rights of way cross or adjoin the site	
Land contamination	
Access constraints	
Environmental constraints	

Please provide any relevant information of likely above constraints	y measures to overcome the
Timescales - Please indicate the approximate timescales available for development (please select one answer)	mescale for when the site will
Immediately	
Up to 5 years	Υ
5 - 10 years	
10 – 15 years	
Beyond 15 years	
Unknown	

Timescales comments – particularly if you have indicated that the site is not immediately available, please explain why
Other Relevant Information – Please use the space below for additional nformation
See attached statement
Question 9
Do you have any site suggestions for Local Green Spaces?
f you would like to suggest several sites, please submit a separate form for each one.
Site location (including grid reference and postcode if known)
Not applicable to these representations

Please provide a site plan clearly identifying the exact boundaries of the site.		
Location - Is the site in reasonably close proximity to the community it se	erves?	

Local Significance - Is the site demonstrably special to a local community and holds a particular local significance, e.g. due to its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife?

Size / Scale - Is	the site local in	character and	l not an extens	ive tract of land?
If possible, plea comments.	ase provide pho	tographs of th	e site that sup	port your

Question 10

Do you have any site suggestions for ecological improvements?

If you would like to suggest several sites, please submit a separate form for each one

Site location (i	including	grid reference an	d postcode	if known
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Not applicable to these representations	
Please provide a site plan clearly i	dentifying the exact boundaries of the site
(please select one answer)	
Do you own the site? (please select one answer) Yes (full ownership) Yes (part ownership)	
(please select one answer) Yes (full ownership) Yes (part ownership)	
(please select one answer) Yes (full ownership) Yes (part ownership) No	ntrol adiacent land.
(please select one answer) Yes (full ownership) Yes (part ownership)	ntrol adjacent land.
(please select one answer) Yes (full ownership) Yes (part ownership) No	ntrol adjacent land.

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ing issues,

Question 11

Do you have any site suggestions for renewable energy?

If you would like to suggest several sites, please submit a separate form for each one.

Site location (including grid reference and postcode if known)

Not applicable to these representations				
Please provide a site plan clearly identifying the exact boundaries of the site.				
Please specify the proposed type and scale of energy development (Capacity (MW), Height to tip (m), Height to hub (m))				
Do you own the site? (please select one answer)				
Yes (full ownership)				
Yes (part ownership)				

How can the site be accessed? Are there any restrictions that may prevent access e.g. third party ownership?		
Please specify known designations (ecological / environmental / historical) o or around the proposed site		
Current land use (including agricultural land quality rating if relevant)		
Proposed grid connection point (if known)		

Question 12

Do you have any site suggestions for other uses that you think should be included in the Local Plan?

included in the Local Plans				
What use is the site proposed for?				
Not applicable to these representations				
Site location (including grid reference and postcode	if known)			
Please provide a site plan clearly identifying the exact boundaries of the site.				
Do you own the site?				
(please select one answer)				
Yes (full ownership)				
Yes (part ownership)				
No				

How can the site be accessed? Are there any restrictions that may prevent access e.g. third party ownership?		
Please specify known designations (ecological / environmental / historical) on or around the proposed site		
Current land use		
Signature		
Date 3 March 2023		
Thank you for completing this response form.		





Project: 23-058

Site Address: High Peak Local Plan Representations 2023

Client: Treville Properties Ltd

Date: 28 February 2023

Author: Rawdon Gascoigne

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1. Introduction

- 1.1 These representations are submitted on behalf of Treville Properties to the High Peak Local Plan Early Engagement. Treville Properties have a number of land interests in the borough. These representations focus on the delivery of housing within the borough. Specific representations are made in relation to the following sites:
 - Land at Bridgemont
 - Land at Linglongs Road, Taxal

2. Response to questions

Question 1: Do you agree with the Council's initial view of the emerging issues from the new evidence? If not, why?

Housing

- 2.1 The Early Engagement document confirms that the Local Housing Need for High Peak, calculated using the Government's standard method, is currently 260dpa. This figure is significantly lower than the requirement set out in the current Local Plan of 350dpa.
- 2.2 Paragraph 61 of the National Planning Policy Framework (the Framework) states:

To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance — unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. (Our emphasis)

2.3 Paragraph 2a-010 of the PPG explains that the standard method is only the starting point and there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates. The PPG states:

The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

- 2.4 This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:
 - growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);
 - strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or



- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;
- 2.5 There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities are encouraged to make as much use as possible of previously developed or brownfield land, and therefore cities and urban centres, not only those subject to the cities and urban centres uplift, may strive to plan for more homes. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.
- 2.6 The examples given in the PPG for when local housing need could be exceeded are not exhaustive. The PPG also recognises at paragraph 2a-010 that the standard method does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. If the amount of housing growth is not sufficient to align with jobs growth, this will serve to constrain economic growth and place significant strain on the housing market due to the additional demand. It would also worsen affordability further if the jobs growth is not matched with sufficient housing growth. This was recognised in the Doncaster Local Plan, where LHN equated to 553 dpa but the plan requirement is 920 dpa. The Inspector's report states at paragraph 56:

"The significant uplift is intended to allow additional people to live in the Borough to ensure a sufficient working population to take account of the number of additional jobs that the Plan aims to accommodate."

2.7 Similarly, a higher figure than LHN has recently been adopted in the St Helens Local Plan. The Inspector's report states at paragraph 54:

"The PPG also makes it clear that other circumstances might also justify a higher figure. In the case of St Helens, the 486 dpa is justified to correlate with the aspirations to achieve increased economic growth and jobs which are likely to lead to increased housing need and demand."

- 2.8 Furthermore, chapter 6 of the Framework relates to building a strong competitive economy. Paragraph 81 of the Framework states planning policies and decision should help to create conditions in which businesses can invest expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business and the wider opportunities for development. Paragraph 82(c) of the Framework continues to state planning policies should:
 - c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment;



- 2.9 Therefore, to understand whether an alternative approach to the standard method is justified, it is critical that an appropriate level of jobs growth is identified. Only then can it be considered how many homes are required to support that growth.
- 2.10 The consultation document refers to the High Peak Housing and Economic Land Needs Assessment (September 2022) (HELNA) which considers the overall housing need, the need for different types of housing and employment land requirements up to 2041.
- 2.11 The HELNA acknowledges that the figure of 260dpa is only the starting the point. Paragraph 9.14 of the HELNA reflects the guidance provided within the PPG and states it is the intention of the government that the local housing need figure is minimum figure which does not attempt to predict future growth, the impact of changing Government policies, changing economic circumstances or other demographic behaviours.
- 2.12 The HELNA states the LHN figure of 260dpa is an appropriate figure moving forward if considering the baseline economic growth forecasts. However, this is not the case if a policy on approach is taken, i.e., if the level of housing growth is to align with the planned level of economic growth. Paragraph 14.18 of the HELNA states:
 - If, however, HPBC decides to pursue a higher level of economic growth and allocates sufficient employment land to support this, in line with the Policy On Scenario for example, then it should also consider increasing the housing target accordingly. The standard methodology is appropriate for PDNPA in so far as it can be used, with other methodologies, to determine need arising within the National Park.
- 2.13 In this scenario a higher housing requirement of 336dpa is suggested as appropriate. To put this figure into perspective in the context of the national policy imperative to 'significantly boost' the supply of housing, 336dpa is still lower than the current housing requirement set out in the adopted Local Plan (350dpa).

Affordable housing

2.14 Paragraph 2a-024 of the PPG states:

"The total need for affordable housing will need to be converted into annual flows by calculating the total net need (subtract total available stock from total gross need) and converting total net need into an annual flow based on the plan period.

The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. An increase in the total housing figures included in



the plan may need to be considered where it could help deliver the required number of affordable homes." (our emphasis)

2.15 Paragraph 67-001 also states:

"Strategic policy-making authorities will need to consider the extent to which the identified needs of specific groups can be addressed in the area, taking into account:

the overall level of need identified using the standard method (and whether the evidence suggests that a higher level of need ought to be considered);

the extent to which the overall housing need can be translated into a housing requirement figure for the plan period; and

the anticipated deliverability of different forms of provision, having regard to viability."

- 2.16 Therefore, the PPG is clear that an increase in the housing requirement can be considered if it is necessary to help address the identified level of affordable housing need. Such consideration ought to be given in High Peak given the scale of affordable housing need, which is very significant.
- 2.17 The HELNA confirms that the affordable housing need for the borough cannot be met by the standard method. Paragraph 14.26 states:

Total affordable needs are in the range between 228 and 270 affordable homes per annum 2021 to 2041. This is a significant proportion of the locally assessed need based on the standard method (260 dpa) of between 88% and 104%. (Our emphasis)

- 2.18 Turning to past delivery of affordable housing, there have been only 432 affordable homes completed during the period 2016/17 to 2021/22. This equates to 20% of the total housing completions over this period.
- 2.19 Therefore, there is no realistic prospect of meeting the identified need for affordable by simply adopting the minimum local housing need as the housing requirement. A substantial and serious shortfall will remain.
- 2.20 Providing a higher housing requirement, and a complementary supply of viable sites, would assist in the delivery of much needed affordable housing and addressing the identified need for affordable housing in the borough and this should be carefully considered by the council as they progress the Local Plan Review. Whilst there is little question that the shortfall cannot be met in full, there is clear justification for considering an increase to the overall housing requirement, in accordance with paragraph 2a-024 of the PPG.

Past delivery

- 2.21 The Early Consultation document at Table 1 provides a summary of housing completions in the borough from 2011-2022. The table demonstrates the variability in housing completions over this period. It can be noted that:
 - Following the adoption of the Local Plan in 2016, there was a clear trend of increased completions which is indicative of increasing market demand and a market which could support a housing requirement above that suggested by the standard method.
 - For the period 2016/17 to 2021/22 (i.e., the period following the adoption of the Local Plan), total completions amount to 2,149 (358dpa). This figure is in excess of local housing need as determined by the standard method (260dpa) and the adopted housing requirement (350dpa).
 - There was a marked decrease in delivery in 2020/21, however this was during the peak of the Covid-19 pandemic which may account for this figure. If the year 2020/21 is removed from the completion data for the last 6 years to account for COVID-19, the average for the period 2016/17 to 2021/22 increases to 380dpa.
- 2.22 We consider that the biggest constraint to the achievement of the housing requirement since the start of the plan period for the current Local Plan (2011) has been a lack of genuinely available, viable and deliverable sites. The sites that primarily delivered from 2016 onwards were those which came forward ahead of the plan, including those sites which were consented on appeal in the absence of an up-to-date plan. However, a number of the allocations in the current adopted plan have proven to have had trajectories that were over-optimistic within the context of the constraints present. The extent of windfall development anticipated in the Local Plans has also proven to be over-optimistic, and Policy H1 of the Local Plan has delivered very little in terms of windfall sites beyond the existing settlement boundaries. Furthermore, several sites have been subject to extremely lengthy planning application processes, with planning applications often taking more than 12 months before determination (and sometimes considerably longer).
- 2.23 Therefore, past delivery should not be used as a reason to constrain the housing requirement moving forward. The focus should be on significantly boosting housing supply and delivery. In practice, this means pursuing a requirement which at least maintains levels of recent delivery (i.e., at least 350dpa) and aligns with the planned level of economic growth (i.e., at least 336dpa).

Housing land supply

2.24 In the consideration of the implications of the HELNA, the consultation document states the council may need to consider supply of housing land as part of the Local Plan process to ensure that there is sufficient

- suitable and available land to meet whatever the new housing requirement is in the new Local Plan over the plan period to 2041.
- 2.25 As with past delivery, the housing requirement should not be constrained by the existing housing land supply. If additional land is required, then the Local Plan should allocate sufficient sites to meet the identified needs. We set out below additional sites that we consider are suitable for allocation through this process, which could contribute to meeting the future housing requirement in a sustainable way.

Housing requirement: summary and conclusions

- 2.26 The circumstances in High Peak provide clear justification for the application of an alternative method to determine local housing need, in accordance with the Framework and paragraph 2a-010 the NPPG. These are as follows:
 - The housing requirement in the adopted Local Plan (350dpa) is significantly higher than the minimum housing need figure produced by the standard method (260dpa).
 - Significantly higher completion figures than the minimum housing need figure produced by the standard method have been achieved in the recent past, with completions since 2016 averaging 358dpa.
 - The housing need associated with planned employment growth is likely to significantly exceed that set out in the standard method. The HELNA states that to align the housing requirement with the planned level of employment growth, the housing requirement would need to be 336dpa.
 - In addition, paragraph 2a-024 of the PPG states that an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes. The affordable housing needs of High Peak cannot be met by the standard method, as acknowledged in the HELNA. Increasing the housing requirement would therefore help to deliver much needed affordable housing and would be entirely consistent with national guidance.
- 2.27 We therefore consider that the housing requirement should be a minimum of 350dpa. This figure would:
 - Align with the housing requirement in the adopted Local Plan, and would be reflective of completion levels achieved since the current Local Plan was adopted in 2016. Anything less than 350dpa would not represent a 'significant boost' to housing supply.
 - Align the housing requirement with the planned level of economic growth.
- 2.28 Ensure that the delivery of affordable housing does not collapse, in the context of the supply of affordable housing at present failing to meet affordable housing needs by some margin. Any decrease in the supply of affordable housing would represent a significant adverse impact.



2.29 In relation to affordable housing need, we consider that the scale of need remains so significant, that an increase in the requirement in excess of 350dpa should be considered. The Council should test options for up to 500dpa to understand what extent of the need can be met, and the availability of suitable sites to meet that need.

Question 7: Do you have any site suggestions for housing?

Proposed allocation – Land to the West of Bridgemont, Whaley Bridge, High Peak

Site description

- 2.30 The site is 1 ha in area. It is located within the village of Bridgemont, which is approximately 1.25 km South of Furness Vale and 700 m north of Whaley Bridge. It is roughly triangular in shape and is bounded by the railway to the West, a playground to the North and by existing development and Buxton Road to the Northeast. A band of trees separates the site from Buxton Road to the Southeast.
- 2.31 Part of the site was previously used as a car park for the former Dog and Partridge Public House. The pub has since closed and has been redeveloped for housing. Part of the site has also been used for housing poultry and related equipment and for keeping horses domestically and the parking of vehicles related to these uses. The remainder of the site is open countryside. The site has been used intermittently as a compound when local infrastructure works have been undertaken. It is currently designated as Green Belt.
- 2.32 The site location and red edge plans are provided at Appendix EP1.
- 2.33 There are no known constraints that may prevent the site from coming forward for housing within the next 5 years.

Planning history

- 2.34 Several applications have been made on the site as summarised below:
 - HPK/000/6625 Erection of 3 dwellings refused;
 - HPK/0002/7703 Residential development refused 18/04/1989;
 - HPK/2015/0324 Erection of 2 dwellings refused 22/04/2015 appeal dismissed
 22/07/2016;
 - HPK/2015/0324 Change of use to car sales refused 11/08/2015 appeal dismissed
 - 22/07/2016; and



- HPK/2015/0486 Detached dwelling (land adjacent to 52 Bridgemont) refused 22/10/2015 appeal dismissed 19/05/16.
- HPK/2020/0180 Outline planning application for erection of 46 no. affordable dwellings with access considered and all other matters reserved refused 14/02/2022
- 2.35 While the most recent applications relate to affordable housing, if the site were released from the Green Belt, it could also accommodate an element of open market housing. The case for releasing the site from the Green Belt is set out later in this statement. The planning history for the site shows that there is a strong desire to bring the land forward for development without delay. It is owned by a local housebuilder, and if the land were allocated for development, the intention would be to obtain planning permission and develop the site immediately.

Proposed allocation

- 2.36 Our client's site is capable of delivering approximately 42 dwellings. An indicative site layout has been produced and is attached at Appendix EP2, which shows a mix of predominantly 2 and 3 bedroomed houses, arranged in short rows of terraced housing fronting an internal access road, with the site being served by a central access point to the highway, adjacent to 32 Buxton Road. Tapering land at the North and South ends of the site provides opportunities for ecological enhancement.
- 2.37 Treville properties Ltd have undertaken assessments relating to transport, landscape, ecology, ground conditions, and drainage, which confirm that there are no overriding technical or other constraints that would prevent development of the site and/or give rise to harm.

Landscape

2.38 The site is located within the "Settled Valley Pastures" as shown on the map on page 12 of the Council's Landscape Character SPD. A landscape impact assessment baseline study has been undertaken for the site by Barnes Walker and is attached at Appendix EP3. The indicative layout at Appendix EP2 shows that the site could accommodate a linear form of development which would reflect the local landscape character – including the stone terraces on lower slopes referred to in the SPD and the existing residential buildings within Bridgemont. The landscape character of the area would be maintained and there would be no significant effects on the National Park.

2.39 In summary:

- Development of the site for housing would be consistent with the existing settlement pattern;
- Natural features such as the trees and woodland located beyond the site boundary to the south can be maintained;



- It would not have a significant effect on the Settled Valley Pastures character type;
- While visible due to the elevated location, the visual effects of the development would be localised and would not be significant;
- The development of the site is acceptable in landscape terms.

Highways and accessibility

- 2.40 Access drawings and a highway assessment have been produced in connection with a recently submitted planning application for the site and are attached at Appendices EP4 and EP5.
- 2.41 TADW drawing no. 311106 04 P6 (Appendix EP4) shows how the existing access to the former Dog and Partridge pub car park would be used to serve the proposed residential development and that suitable visibility splays and access dimensions can be achieved, together with off street parking in accordance with the Council's standards. The Transport Assessment shows that allocation of the site for housing is acceptable in highways terms.
- 2.42 Having regard to sustainability of the site location:
 - The site is well located in relation to a range of modes of transport. It is approximately 1km walking distance from Whaley Bridge railway station and 1.2km walking distance to Furness Vale railway station. Both stations provide hourly services to Manchester Piccadilly, Stockport and Buxton. Two trains an hour are provided at peak hours.
 - The nearest bus stops to the site are located just 100 m to the south. These stops are served by regular buses to destinations including Disley, New Mills, Macclesfield, Glossop, Buxton, Chapel-en-le-Frith, Marple, Stockport and Manchester Airport.
 - In terms of cycling, the A5004 is recognised as being an on-road cycle route. The site is also located close to the Peak Forest Canal, which is a recognised off-road cycle route which connects the site to Whaley Bridge, New Mills and Chinley.
 - Finally, the site is within 1Km walking distance of Whaley Bridge centre and the services and facilities this provides. The Tesco supermarket and B&M store are considerably closer. The site is evidently sustainable given the nearby approval of affordable housing at Bridgemont under application reference HPK/2017/0536 which is detailed further below
 - A number of primary and secondary schools are located in the local area. Whaley Bridge, Buxworth and Furness Vale Primary School's all being within 1.2km of the site; and Peak School.
- 2.43 The site is considered to be in sustainable location and would make a logical extension to the existing settlement.



Ecology

- 2.44 A preliminary ecological appraisal been prepared by NLG Ecology in connection with the recent planning application for the site and is attached at Appendix EP6. Key points are summarised below:
 - The site falls within the Impact Risk Zone (IRZ) for several designated sites. However, housing does not fall under any of the categories listed on the IRZ detail. Therefore, it is not required for the LPA to consult Natural England on that basis.
 - The site includes habitats for nesting birds, amphibians, badger, rabbit, fox and other small mammals. Suitable working methods would avoid harm to these species.
 - The site has negligible potential for bats.
 - Offsite ponds have previously been surveyed and no newts have been found. However, if
 newts were found in future, this could be managed by obtaining the necessary low-impact
 licences and following precautionary working methods.
 - There are no overriding ecological constraints to developing the site.

Trees

2.45 Development at the site can be accommodated without harm to trees. The woodland to the Southeast of the site would be retained.

Flood Risk and Drainage

- 2.46 The site sits within Flood Zone 1 and is considered to have a low risk of flooding and would be suitable for residential development in that respect.
- 2.47 An indicative drainage strategy has been prepared, which shows that there would be no significant off-site impacts as a result of this development and that the proposal would satisfy paragraph 103 of the Framework. A copy of the drainage strategy is attached at Appendix EP7.

Noise

2.48 There are no overriding constraints at the site with regard to noise impacts from the proximity of the site to the railway line. Residential development has recently been approved and completed (by Peaks and Plains), a short distance to the North of the site, which is closer to the railway line than the application site and where the Noise Impact Assessment submitted with the application concluded that noise affecting that site was mainly from traffic on the A6. Given the geographical proximity and similarities between the two sites in terms of their context, it is considered that development can be accommodated with suitable levels of residential amenity.

Green Belt

- 2.49 With the exception of the Tesco supermarket and adjoining land, the whole of Bridgemont is washed over by the Green Belt. However, our client's site at Bridgemont is enclosed on all sides by rail, road and existing residential properties and does not fulfil Green Belt purposes.
- 2.50 We consider that there is a case based on exceptional circumstances for the whole of Bridgemont to be released from the Green Belt. However, even if the whole of Bridgemont is not removed from the Green Belt, our client's site could be released to accommodate new residential development to help meet the housing needs in High Peak. This was the approach adopted in allocating a similar size Green Belt site at Furness Vale at the time of the last plan review to meet needs in this area. It is noted that some smaller ribbon settlements such as Tunstead Milton are identified as inset villages which do not form part of the Green Belt, whereas others including the ribbon of development along the A6 to the south of Furness Vale (i.e. Bridgemont) are washed over. This has been highlighted by inspectors for previous versions of the Local Plan as being inconsistent, with specific reference being made to the Bridgemont area. The Inspector's report into objections for an emerging local plan in June 2004 stated the following:
 - 4.2.19 In principle I agree with the Council's approach, for in a Plan which denotes all but the very smallest settlements by a built-up area boundary, there is little basis for permitting infilling in settlements not so identified. Small rural hamlets are clearly part of the countryside, and in most cases further development would be both unsustainable and detrimental to their character. The difficulty arises, in my view, with the ribbons of houses that are prevalent along the main routes through the Central Area, in particular. A number include small employment sites and local facilities, and in certain cases public transport accessibility is likely to be better than at the more remote identified settlements. Moreover, some areas appear noticeably larger than the smallest identified settlements. For example, the ribbons of development along the A6 to the north and south of Furness Vale, or between Chapel and Chinley, or at Lower Hague/Hague Bar, seem to be more extensive than Tunstead Milton, which also has a ribbon form.
 - 4.2.20 Consequently, whilst I support the deletion of the clause relating to limited infilling or redevelopment, I think it important that the process of delineating settlements with a boundary is consistent. The fact that a particular ribbon settlement may be tightly built, with little opportunity for development, does not itself justify its exclusion as an urban area, especially if other ribbon settlements are included. If it is appropriate to perpetuate these ribbons of development, which the identification of Tunstead Milton would suggest it is, then other similar areas should also be identified. I recommend that the Council re-examine the identification of settlements to ensure that its approach is consistent.

- 2.51 We consider that this issue should be revisited as part of the Local Plan review and that the village of Bridgemont should be released from the Green Belt/inset. However, even if the whole of Bridgemont is not removed from the Green Belt, the subject site could accommodate new development as indicated by the Furness Vale example at the time of the last Local Plan Examination. The indicative layout appended shows that the site could accommodate 42 dwellings, including affordable housing. There would be a contribution towards upgrading the nearby play facility.
- 2.52 The land at Bridgemont is bounded by the railway to one side, existing residential development to another and woodland to another. The site is clearly bounded on all sides by clear defensible boundaries and its allocation would not conflict with the purposes of Green Belt designation.
- 2.53 In particular, our client's land does not:
 - check the unrestricted sprawl of large built-up areas;
 - prevent neighbouring towns merging into one another;
 - assist in safeguarding the countryside from encroachment; or
 - preserve the setting and special character of historic towns.
- 2.54 Paragraph 143 of the Framework state that when defining Green Belt boundaries, plans should, amongst other things,
 - (a) ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development;
 - (b) not include land which it is unnecessary to keep permanently open;
 - (e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and
 - (f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.
- 2.55 The release of our client's land from the Green Belt would not conflict with any of the above. There is no reason to keep this land open and the permanent boundaries would ensure there is no further extension into the Green Belt.

Conclusion

2.56 The site is in a sustainable location and would help to deliver a mix of housing as part of the Local Plan Review. There are no constraints which would prevent the site from being developed and a number of benefits could be delivered as part of future proposals. The site does not contribute to the purposes of the Green Belt and we consider there is a wider case, on the basis of exceptional circumstances, to justify removal of the whole of the village of Bridgemont from the Green Belt. We therefore consider that the site should be released from the Green Belt and form a housing allocation in the next Local Plan.

Proposed allocation – Land at Linglongs Road, Taxal, Whaley Bridge

Site description

- 2.57 The site comprises approximately 5.5ha of agricultural land. It is located immediately to the South of Whaley Bridge and adjoins the settlement boundary. The land is bounded by existing housing to the North, by fields to the South (which separate the site from the Peak District National Park), and by Linglongs Road to the West. There is a public footpath the West of the site, beyond which land rises to a tree covered ridge. The former children's home and associated development at Taxal Edge is located to the Northwest of the site. This is now in residential use, with various planning permissions having been granted for conversion and/or redevelopment of the site for housing. Land to the Northeast on the opposite side of Linglongs Road is currently being developed for housing by Barratt Homes.
- 2.58 The site is currently subdivided into smaller fields by post and wire fencing, with a small Equestrian type building in the Northwest corner. Boundaries are marked by a mix of post and wire/post and rail fencing, domestic fencing, low stone walls and trees.
- 2.59 The site location and red edge plans are provided at Appendix EP8.
- 2.60 While less detailed information is presented to support the allocation of this land than for our client's land interests at Bridgemont, this is purely due to the fact that proposals for development have already been advanced for residential development at the site in Bridgemont and assessments undertaken in connection with that application. Notwithstanding this, the nature of the land at Linglongs Road and the lack of any apparent constraints means that the site could be brought forward for housing within the next 5 years. It is largely owned by our client (a housebuilding company) and although a small part of the site is in third party ownership, they have no objections to the land being brought forward for development by Treville Properties.

Planning history

2.61 The site has a limited planning history. Planning permission was refused for residential development in 1989 (application reference HPK/0002/7558).

Proposed allocation

- 2.62 Assuming a development of circa 20 dwellings per hectare our client's site is capable of delivering approximately 110 new homes. This density is reflective of the densities achieved on nearby sites, allows a proportion of the land to be used for landscape planting and ecological enhancement and takes account of our client's aspirations for a development based around individually designed properties with a proportion of self-build homes and typologies reflective of the small scale and grand villas within the council's residential design SPD. In recognition of that, a more spacious less dense approach to larger individual dwellings as the primary focus would also be an option for this site.
- 2.63 At this stage, detailed technical assessments have not been undertaken. However, there are no known constraints to development. The land is in agricultural use and is of no apparent significant ecological value, being similar in nature to other agricultural land in the immediate vicinity that has been allocated and developed for housing. Visibility along Linglongs Road is good, providing various opportunities for safe access to be obtained to the land. The site is in flood zone 1 and is not identified on the Environment Agency maps as being at risk of flooding from surface water, meaning it falls within the lowest category of risk for flooding.

Landscape

- 2.64 There are limited natural features on the site. However there is the opportunity to retain trees and vegetation along and beyond the site boundaries and ample room within the site to provide additional landscape planting as part of a comprehensive landscape framework, including the potential for tree/woodland planting along the Southern boundary of the site to link in with existing woodland to the East and West, which would strengthen existing ecological/green corridors and provide a landscape buffer to the National Park. Combined with further landscaping within the body of the site, this would enhance the appearance of the settlement edge, which is currently delineated by various types of domestic fencing to the gardens of properties on Linglongs Avenue and Beech Rise.
- 2.65 The body of the site contains no significant landscape features and there are no known constraints to development. This gives flexibility to develop a strong landscape framework within which new housing can be designed in a manner that complements the existing settlement pattern; is consistent with the requirements of local landscape guidance/character assessments; and which ensures there is no harm to the setting of the National Park, or views within and from it.

2.66 In terms of the overall effect of development in this location, it is considered that the ridgeline to the West of the site is a strong natural physical barrier, which is already perceived as the extent of the urban edge of Whaley Bridge to the Northwest of the site. Development at the site would be contained by this ridge, which would form a strong, recognisable and defensible boundary to the settlement edge, beyond which, local landscape character changes, with a much more rural feel (to the West of the ridge, the densely wooded western slopes of the ridgeline culminate at Macclesfield Road and more open areas comprising small enclosed pastoral fields extend down to the southern banks of Toddbrook Reservoir).

Design

2.67 The nature of the site provides various options with regard to design. However, as noted above, our client's intention is that the site would be brought forward for a high quality development of individually designed family homes, including self-build properties and a number of dwellings based around the small scale and grand villa typologies in local residential design guidance and reflecting the historic residential form and role of Whaley Bridge. These would be set within a strong landscape framework to reflect the edge of settlement location.

Highways and accessibility

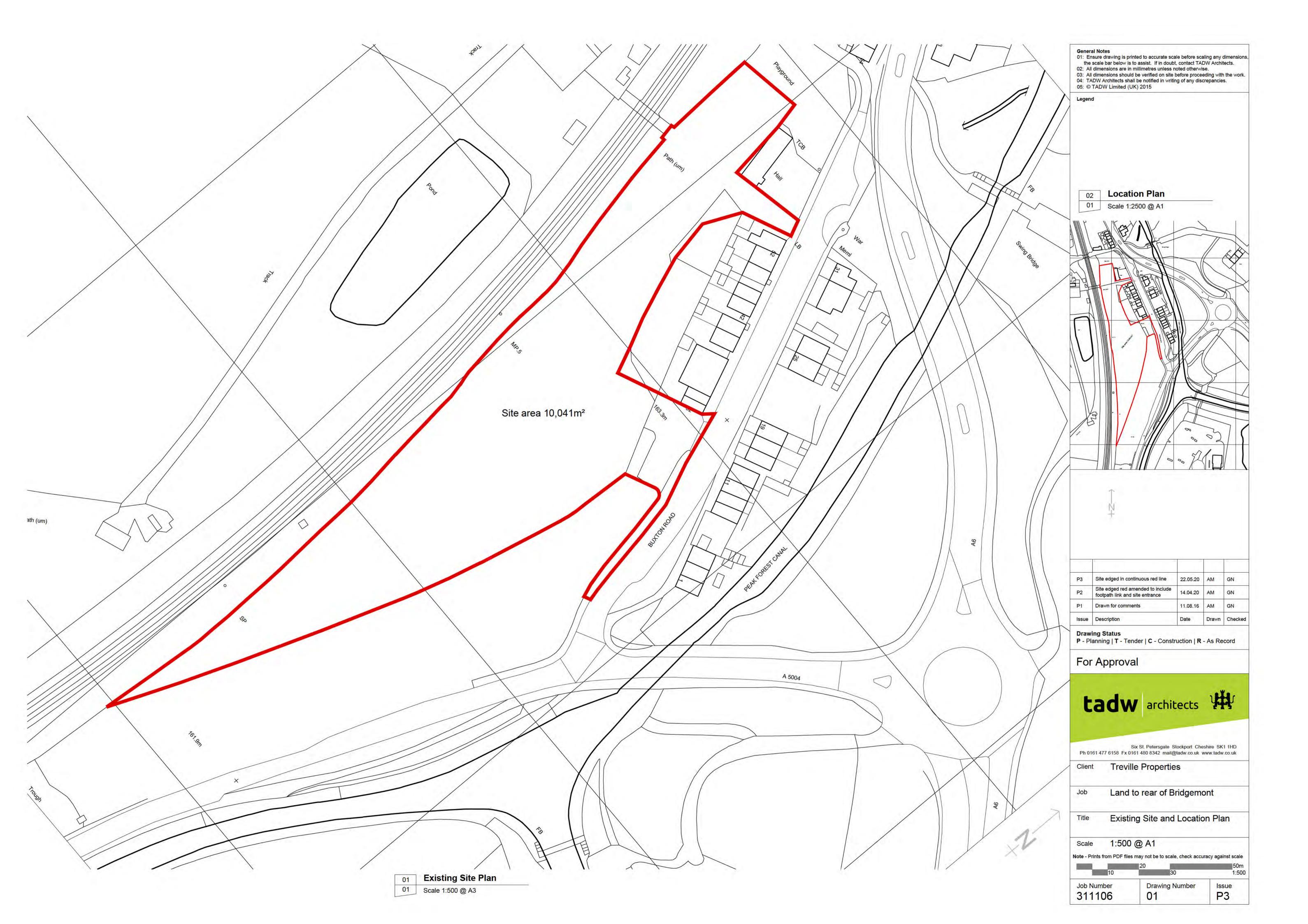
- 2.68 As noted above, the alignment of Linglongs Road and the length of the Eastern site boundary provides various safe and convenient access options.
- 2.69 Having regard to sustainability of the site location:
 - The site is well located in relation to a range of modes of transport. It is approximately 1.3km from Whaley Bridge railway station (circa 1 mile walking distance) which provides regular services to Manchester Piccadilly, Stockport and Buxton.
 - The nearest bus stops to the site are within approximately 250m, providing regular links to New Mills, Chapel-en-le-Frith and Macclesfield.
 - There are numerous cycling and walking routes in the local area.
 - The site would offer convenient access to the range of services, facilities and schools within Whaley Bridge.
 - Given that the LPA have accepted the Barratt Homes site on the opposite side of the road is a
 suitable location for housing (both in granting planning permission and in allocating the land),
 there can be no question that our client's site is also sustainable.
- 2.70 The site is considered to be in a sustainable location and would make a logical extension to the existing settlement.

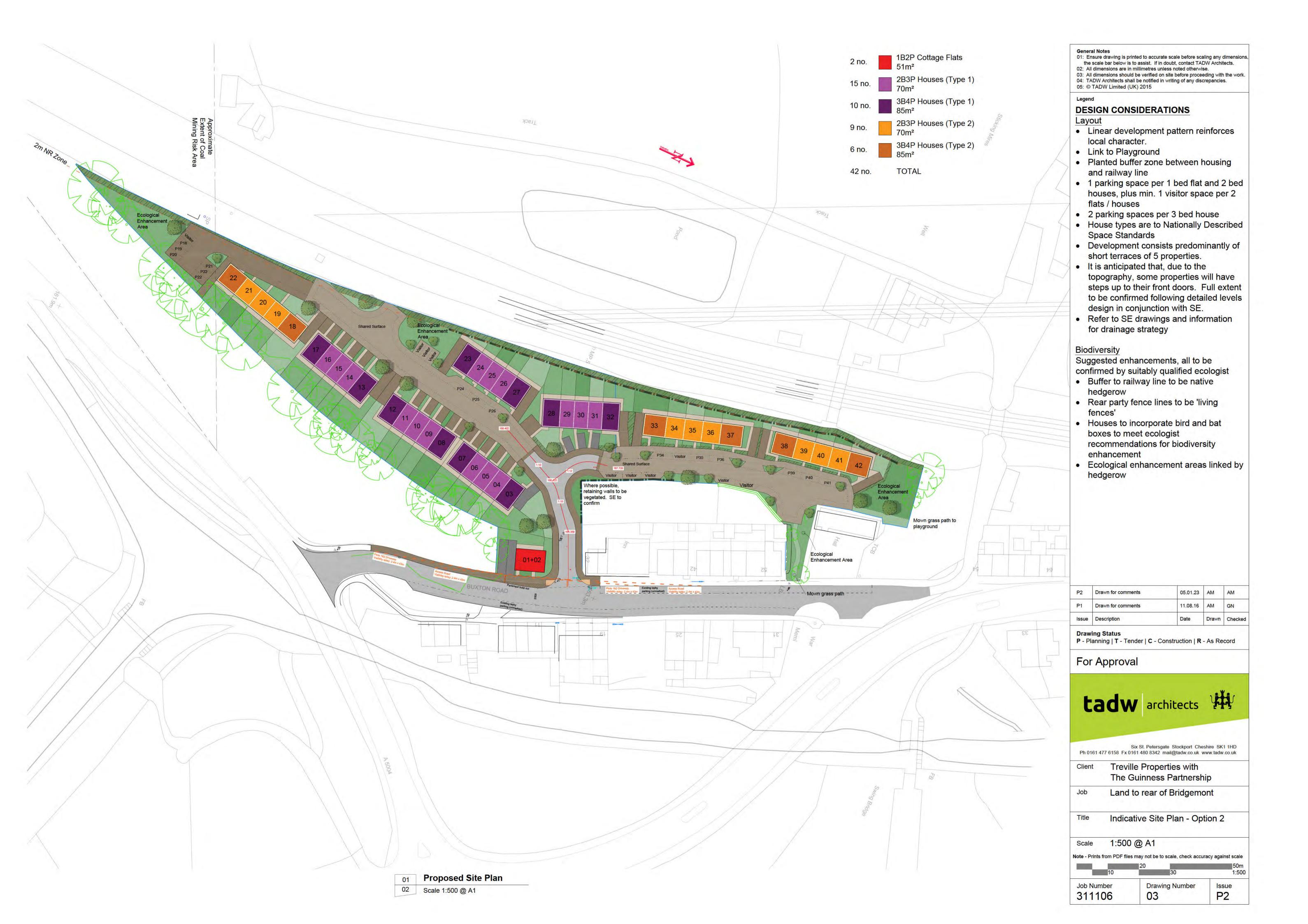
Ecology

2.71 The site is predominantly improved agricultural land which is not of high ecological value. There are no hedgerows or significant ecological features within the body of the site and no known ecological constraints to development. Allocation of the site for housing provides the opportunity to enhance the ecological value of the land, provide linkages to woodland to the East and West (improving ecological and habitat connectivity) and to easily accommodate biodiversity net gain in accordance (or exceedance) of government requirements.

Conclusion

2.72 The site is in a sustainable location and would help to deliver a mix of housing as part of the Local Plan Review. There are no constraints which would prevent the site from being developed and a number of benefits could be delivered as part of future proposals. Beyond the significant benefits associated with the delivery of local housing, these include significant opportunities for ecological enhancement and improvements to the character of the settlement edge of Whaley Bridge. The land is largely owned by our client who is a local house builder with a track record of delivering high quality housing schemes. In light of this, it is anticipated that the site could be brought forward for housing within the first 5 years of the plan period. In light of the above, we consider that the land to the West of Linglongs Road should form a housing allocation in the next Local Plan.





Landscape and Visual Impact Assessment: Establishing the Baseline

Land to the west of Bridgemont, High Peak

For: Treville Properties

Ref: M3645-PA-DOC-01-V01





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Figures

Figure 1 - Site Location and Study Area

Figure 2 - Site Context

Figure 3 - Landscape Character Area Plan

Figure 4 - Visual Receptors and Viewpoint Location Plan

Introduction

- 1.1 Barnes Walker Ltd has prepared this Landscape and Visual Impact Assessment (LVIA) on behalf of Treville Properties, to accompany an outline planning application for the construction of affordable dwellings at land to the west of Bridgemont, High Peak.
- 1.2 The application site lies at the settlement edge of Bridgemont, within the Green Belt. It comprises a linear tract of land between properties on the western side of Bridgemont and the railway to the west and incorporates a small car parking area that served the former Dog and Partridge public house. The site is currently used for storage of building materials and equipment and for keeping animals, primarily chickens.
- 1.3 The site is the subject of a number of previous planning applications as follows:
 - HPK/000/6625 Erection of 3 dwellings
 refused;
 - HPK/0002/7703 Residential development - refused 18/04/1989;
 - HPK/2015/0324 Erection of 2 dwellings
 refused 22/04/2015 appeal dismissed
 22/07/2016;
 - HPK/2015/0324 Change of use to car sales - refused 11/08/2015 - appeal dismissed 22/07/2016;
 - HPK/2015/0486 Detached dwelling

- (land adjacent to 52 Bridgemont) refused 22/10/2015 appeal dismissed 19/05/16; and
- HPK/2020/0180 Outline planning permission for 46 affordable dwellings refused 14/02/22
- 1.4 This LVIA supports a planning application for residential development that follows the most recently refused application HPK/2020/0180, which seeks to address the concerns of High Peak Borough Council and the comments received from consultees in regards to the previously refused planning application.
- 1.5 This LVIA has been undertaken by a Chartered Member of the Landscape Institute and its key objective is to ascertain potential landscape and visual effects associated with the proposed development, whilst concurrently informing the design process for the site.
- 1.6 An LVIA was prepared for the previously refused planning application, the findings of which were to some extent challenged by the Landscape Officer as part of the Committee response dated 14/02/2022.

1.7

In order to prepare this document, desk-top studies were undertaken prior to a site based survey and assessment exercise. This work informed the preparation of the baseline report which confirmed the nature of the site and the surrounding landscape, any relevant landscape character assessments, associated

- planning policy and heritage assets before ascertaining the key landscape and visual receptors for the assessment. The report then goes on to describe the development proposals before ascertaining any potential landscape and visual effects which may result from the implementation of the proposals.
- 1.8 Anticipated landscape effects may be generated by the proposed development on the landscape resource, which include its physical features, character, fabric and the quality of the landscape. These could include direct, physical effects upon landscape elements, such as the loss of a tree or tangible effects to an existing landscape character.
- 1.9 Visual effects are the predicted changes to a view and the associated effect of those changes upon the relevant visual receptors. Typically, the various visual receptor groups may comprise the residents of properties, the users of Public Rights of Way, the users of recreational facilities, pedestrians, and users of a variety of forms of transport such as road users or rail passengers.
- 1.10 This assessment has been undertaken with reference to, and using aspects of, the Guidelines for Landscape and Visual Impact Assessment (Third Edition 2013), by the Landscape Institute and the Institute of Environmental Management and Assessment.



The location and context of the site and the study area associated with this LVIA is described by Figure 1. Factors determining the extent of the study area are set out within the methodology in Appendix 1.





Application Site Boundary

Planning Policy

National Planning Policy Framework

- 2.1 The National Planning Policy Framework (NPPF) document has replaced the Planning Policy Guidance (PPG's) and Planning Policy Statements (PPS's). The NPPF distils the content of these documents into a single comprehensive and concise document and now represents relevant planning policy at a national level.
- 2.2 Sections 2 and 3 of the NPPF (2021) sets out the underlying principles of sustainable development that should underpin both plan-making and decision-taking. It sets out 3no. over-arching economic, social and environmental objectives to achieve sustainable development. The environmental objective is considered to be relevant to the potential landscape and visual effects associated with the development proposals.
- 2.3 The following sections are considered to be of relevance and contain further detail to inform how those principles are to be delivered:
 - Section 12: Achieving Well-Designed Places:
 - Section 13: Protecting Green Belt Land; and
 - Section 15: Conserving and Enhancing the Natural Environment

Local Planning Policy

High Peak Borough Council

2.4 The High Peak Local Plan (adopted April 2016) forms the development plan for High Peak Borough up to 2031. The adopted Proposals Map does not show any landscape quality designations within the site or wider study area. The entire application site area sits within land designated as Green Belt.

High Peak Borough Local Plan Policies

- 2.5 The following key policies of the St Helens Borough Local Plan are considered to be of relevance to this LVIA and the landscape context of the application site:
- 2.6 Policy EQ2 Landscape Character

'The Council will seek to protect, enhance and restore the landscape character of the Plan Area... This will be achieved by:

 Requiring that development proposals are informed by, and are sympathetic to the distinctive landscape character areas as identified in the Landscape Character Supplementary Planning Document and also take into account other evidence of historic landscape characterisation, landscape sensitivity, landscape impact and the setting of the Peak District National Park and where appropriate incorporate landscape mitigation

measures

- Requiring that development proposals protect and/or enhance the character, appearance and local distinctiveness of the landscape and landscape setting of the Peak District National Park
- Resisting development which would harm or be detrimental to the character of the local and wider landscape or the setting of a settlement as identified in the Landscape Impact Assessment.'
- 2.7 Policy EQ3 Rural Development

'Outside the settlement boundaries and sites allocated for development as defined on the Policies Map, including the Green Belt, the Council will seek to ensure that new development is strictly controlled in order to protect the landscape's intrinsic character and distinctiveness, including the character, appearance and integrity of the historic and cultural environment and the setting of the Peak District National Park... This will be achieved by:

 Ensuring that all development is of a high quality design and protects or enhances landscape character and the setting of the Peak District National Park

Planning Policy

Allowing the following forms of new residential development:

- Affordable housing in accordance with Local Plan Policy H5
- Development in accordance with Policy H1'
- 2.8 Policy EQ4 Green Belt Development

'The Council will seek to protect the Green Belt and maintain its openness and permanence... Within the Green Belt, planning permission will not be granted for development unless it is in accordance with national planning policy.'

2.9 Policy H1 – Location of Housing Development

'The Council will give consideration to approving sustainable sites outside the defined built up area boundaries, taking into account other policies in this Local Plan, provided that...

- The development would adjoin the built up area boundary and be well related with the existing pattern of development and surrounding land uses and of an appropriate scale for the settlement; and
- the development would not lead to prominent intrusion into the countryside or have a significant adverse impact on

the character of the countryside; and

- it would have reasonable access by foot, cycle or public transport to schools medical services, shops and other community facilities; and
- the local and strategic infrastructure can meet the additional requirements arising from the development
- 2.10 Policy H4 Affordable Housing

'The Council will seek to maximise the delivery of affordable housing across the plan area by working in partnership with the Homes and Community Agency, Registered Providers, Developers and Local Communities.'

2.11 Policy H5 – Rural Exception Sites

'In exceptional circumstances, proposals for affordable housing on rural sites that would not normally be released for housing development will be supported provided that:

- The development is of a size and type which can be justified by evidence of need from a local housing needs survey
- The affordable housing would meet a genuine local need as defined in the Affordable Housing Supplementary Planning Document
- Appropriate safeguards are put in place that ensure that the housing will remain

- affordable for successive occupiers in perpetuity
- The site is located within or adjoining the settlement boundary of a village and is adequately served by existing services and facilities
- The development takes full account of environmental considerations, including European sites
- The development provides all affordable housing unless it can be demonstrated that an element of market housing is required to deliver a significant amount of affordable housing'

Whaley Bridge Neighbourhood Plan

- 2.12 Whaley Bridge Town Council submitted their Neighbourhood Plan to High Peak Borough Council for approval in November 2022. It forms the development plan for the Neighbourhood Area surrounding the town of Whaley Bridge, which includes Bridgemont and the site, for the plan period up to 2032. Whilst the Neighbourhood Plan has not yet been adopted, the following policies are considered to be of relevance to this LVIA and the landscape context of the application site:
- 2.13 Policy WB-G3 Residential Development'Residential development outside of the Peak District National Park will be supported for

Planning Policy

the following locations, subject to meeting the requirements of other policies in this Neighbourhood Plan:

a. within the defined Whaley Bridge settlement boundary;

b. within the defined Town Centre, providing street-frontage ground floor units are in uses open to the public;

c. brownfield sites;

d. infill sites in the form of gaps in existing substantially built-up frontages.'

Policy WB-H2 – Peak Forest Canal

'Development must not harm amenity, setting, safety or accessibility of the canal or towpath. Opportunities should be taken to enhance the amenity, setting, safety and accessibility of the canal and towpath.'

- 2.14 WB-E4 Rural and Landscape Character
 - Development on the edge of settlements must include landscaping and natural boundary treatments to create a soft transition between the built and rural areas.
 - Development must take account of the area's topography and avoid harmful

- visual impacts on the wider rural area, including long-distance views.
- Development should take opportunities to enhance and have no adverse impact on views along the Goyt Valley.

Supplementary Planing Documents (SPDs)

2.15

2.17

SPDs provide more detailed advice and guidance on policies in the Local Plan. They are used to help the Planning Authority to make decisions on planning applications.

High Peak Borough Council Design Guide SPD

2.16 The High Peak Borough Council Design
Guide SPD was adopted in February 2018
and outlines overarching principles in
securing good design. The design guide is a
material consideration in all relevant planning
applications.

<u>High Peak Borough Council Residential Design SPD</u>

High Peak Borough Council Residential Design Guide SPD was adopted in December 2005. It highlights design issues for new housing development in the High Peak expanding upon Local Development Plan policy to provide more detailed and practical design advice to those involved in new residential development.

3.1	The Application Site The application site covers an area of circa 1.00 hectare and is located to the west of the Bridgemont settlement area in the High Peak.	3.6	The site's western boundary follows the Buxton Railway Line which lies immediately west of the site, beyond a timber post and wire fence.	3.10	The woodland to the south of the site is classified as Category B and consists of predominantly semi-mature trees of mixed species including goat willow, hawthorn, scots pine, beech, sycamore, sessile oak, alder, elm and ash.
3.2	Figure 2 shows the site and its immediate	3.7	The northern boundary of the site extends		
3.2	context.		to the rear of Bridgemont Village Hall and is defined by a timber post and rail fence that wraps around a play area to the north.	3.11	There are four other surveyed trees located outside of the site boundary including two
3.3	Site Photographs A to E illustrate the features within and views from the site. The locations from which the site photographs were taken are also described by Figure 2.	3.8	The south-eastern and southern boundaries are defined by an area of woodland block that lies between the site and the A5004 Buxton		semi-mature willows classified as Category C, and two semi-mature Prunus classified as Category B and Category C.
3.4	The site comprises mostly grassland with an area covered by ground protections mats to protect the ground from heavy machinery stored on site. There is an area of hardstanding at the top of the temporary access road, which takes is access via Bridgemont south of the Village Hall - see Site Photograph B. To the east of the site, behind the existing housing along Bridgemont, temporary steel fencing encloses an area for keeping animals, predominantly chickens. Tree cover on site is minimal.	3.9	An Arboricultural Impact Assessment (AIA) has been undertaken by Thompson Tree Services and this LVIA should be read alongside its findings. The Tree Survey categorises the trees in line with the British Standard: Trees in relation to design, demolition and construction – Recommendations (BS 5837, 2012). The AIA identifies three individual trees on site including a young oak classified as Category B	3.12	Whilst the detailed layout of the proposed development is not yet finalised, there is scope for appropriate retention and protection of the highest quality trees both on site and outside of the site boundary.
3.5	The site's eastern boundary is mostly defined by rear garden boundaries of existing housing along Bridgemont. The boundary extends eastwards to include the car park of the former Dog and Partridge public house, which is the location of the proposed site access.		(Trees of moderate quality with an estimated remaining life expectancy of at least 20 years) and a semi-mature hawthorn and semi-mature willow both classified as Category C (Trees of low quality with an estimated remaining life expectancy of at least 10 years, or young trees with a stem diameter below 150 mm).		





Application Site Boundary



Site Photograph Locations



Site Photo A

View from Bridgemont looking west, across the car park of former Dog & Partridge public house, towards the proposed site access



Site Photo B

View from Bridgemont looking west towards current site access



Site Photo

View from within the site looking north



Site Photo D

View from within the site looking north



Site Photo D View from within the site looking south-east

The Surrounding Landscape

- 3.13 Figure 1 describes the wider study area which lies between existing settlement areas of Furness Vale to the north, Whaley Bridge to the south and Buxworth and Chinley to the east. The site is located within the settlement area of Bridgemont, which forms a ribbon development along the A6 and a section of the road that has been diverted. Two railway lines, the A6 dual carriageway and the Peak Forest Canal follow the valley landform in close proximity to the site.
- 3.14 Settlement areas are generally concentrated on lower ground of the valley surrounded by hills of the wider landscape, some of which are located within the Peak District National Park. The study area encompasses areas of higher ground surrounding the site including Eccles Pike to the south-east and a small area circa 2km to the north-east that lies within the Peak District National Park.
- 3.15 The surrounding landscape is predominantly agricultural land used for pasture associated with a number of farms scattered across the wider study area. The surrounding hills are dissected by streams and rivers resulting in a ridge-and-valley landscape broken up by drystone gritstone walls along agricultural field boundaries and steep wooded cloughs.
- 3.16 Despite the open nature of the landscape of the higher ground surrounding the site,

- the site is relatively visually discrete from the north and south due to variations in topography, existing built form and the presence of intervening tree cover, which includes a woodland block that lies immediately south of the site and wraps around the site's south-eastern boundary.
- 3.17 There are a number of PRoW throughout the study area, both within the lower parts of the valleys and upon the higher ground surrounding the site and Whaley Bridge in general. The higher locations allow people to experience expansive and longer distance views, which include the application site, the study area and the wider landscape beyond.
- 3.18 Housing in Bridgemont is predominantly terraced housing with some semi-detached properties in a linear pattern, with a continuous facade that faces the road. The Village Hall is set back from the road and lies to the north-east of the site. Housing in Bridgemont extends north along the A6. The local architectural style is predominantly local stone with slate tiled roofs.
- 3.19 To the north of the site there is a recent development comprising affordable homes that was approved in 2018. This site is of a similar nature to the application site including its location between the railway and the A6, boundaries and its elevated nature in relation to existing housing of Bridgemont.



Existing housing of Bridgemont to the east of the site.



Recently constructed affordable housing to the north of the site.

Landscape Character Assessments

- 3.20 The diverse characteristics of the broader landscape have, in most cases, been ascertained through the process of landscape character assessment (LCA). LCA is a technique used to develop a consistent and comprehensive understanding of what gives England's landscape its character.
- 2.18 It is noted that the site falls within National Character Area (NCA) 53 South West Peak and is in close proximity to NCA 51 Dark Peak. The NCAs cover large tracts of land and NCA 53 identifies a dispersed settlement pattern of small settlements and traditional farmsteads. Any effects upon NCA 53 and 51 that may result from the proposed development are of such an insignificant scale and are not considered to be uncharacteristic and have therefore been scoped out of this assessment.
- 3.21 Assessments for the landscape in the vicinity of the application site have been carried out at regional scales as follows:
 - The Landscape Character of Derbyshire (4th edition) - see Appendix 2 for extract
 - High Peak Borough Council Landscape Character Supplementary Planning Document (SPD) (March 2006) - see Appendix 3 for extract

- Peak District National Park Authority Landscape Strategy (July 2009) - see Appendix 4 for extract.
- 3.22 Figure 3 shows the Landscape Character Areas within the study area.
- 3.23 The site falls within an area assessed to be Landscape Character Type (LCT) Settled Valley Pastures in The Landscape Character of Derbyshire and High Peak Borough Council Landscape Character SPD. This overlaps with LCT Valley Pastures with Industry in the Peak District National Park Authority Landscape Strategy.
 - Settled Valley Pastures & Valley Pastures with Industry
- 3.24 The Landscape Character of Derbyshire describes LCT Settled Valley Pastures as follows:
 - 'A settled, pastoral farming landscape on gently sloping lower valley sides, dissected by stream valleys. Dense watercourse trees, scattered boundary trees and tree groups around settlement contribute to a strongly wooded character.'
- 3.25 The High Peak Borough Council Landscape Character SPD describes the Settled Valley Pastures as follows:

'There are scattered farmsteads outside the compact settlements... The landscape has a strong network of winding lanes and roads and railways along the lower slopes above the floodplain. This is a well wooded landscape with wooded cloughs around tributary valleys and hedgerows with some hedgerow trees which define irregular fields. Amenity tree groups are associated with settlements and there is woodland along roads and railway lines.'

3.26 The Peak District National Park Authority Landscape Strategy describes the Valley Pastures with Industry as follows:

'A small scale, settled pastoral landscape on undulating lower valley slopes. There are filtered views through scattered hedgerows and dense streamside trees. Stone built terraced housing on lower slopes is associated with historic mills. There are dispersed gritstone farmsteads as well as small clusters of farms with associated dwellings. Pastoral farmland is bounded by hedgerows and drystone walls.'

The site lies within close proximity to an area assessed as LCT Riverside Meadows in all three landscape character assessments.

3.27

Riverside Meadows

3.28 The Landscape Character of Derbyshire describes LCT Riverside Meadows as follows:

'Gentle valley floors contain upland rivers, lined with dense trees. Hedgerows enclose small, sub-regular fields in a pastoral landscape, interrupted by the occasional historic mill.'

3.29 The High Peak Borough Council Landscape Character SPD describes the Riverside Meadows as follows:

'Meandering rivers dissect... to create gentle valley floors with narrow flood plains... The traditional land use has been meadowland cattle grazing in medium sized fields that are enclosed with either thorn hedges with occasional hedgerow trees... or dry-stone walls; these are often straight. The river corridors are enclosed due to the steep valley sides and extensive woodland... largely unsettled with farmsteads located on the valley sides... There are few lanes across the corridors but along the edges there are some major roads and railway lines which are often constructed on embankments'

3.30 The Peak District National Park Authority Landscape Strategy describes the River Meadows as follows: 'A small scale pastoral landscape characterised by a meandering river channel... Views are often tightly framed by lines of riverside trees.'

3.31 On higher ground to the south-east of the study area is an area assessed as LCT Enclosed Moorland in both The Landscape Character of Derbyshire and High Peak Borough Council Landscape Character SPD. This same area of land is assessed as Enclosed Gritstone Upland in the Peak District National Park Authority Landscape Strategy.

3.32 To the north-east of the study area is an area of land that lies within the Peak District National Park. This area is also assessed as Enclosed Gritstone Upland in the Peak District National Park Authority Landscape Strategy.

Enclosed Moorland & Enclosed Gritstone
Upland

3.33 The Landscape Character of Derbyshire describes LCT Enclosed Moorland as follows:

'An open, upland-farming landscape on broad rolling hill summits with patches of remnant moorland. Dry-stone walls enclose regular fields and straight roads join occasional isolated farmsteads'

The High Peak Borough Council Landscape Character SPD describes the Enclosed

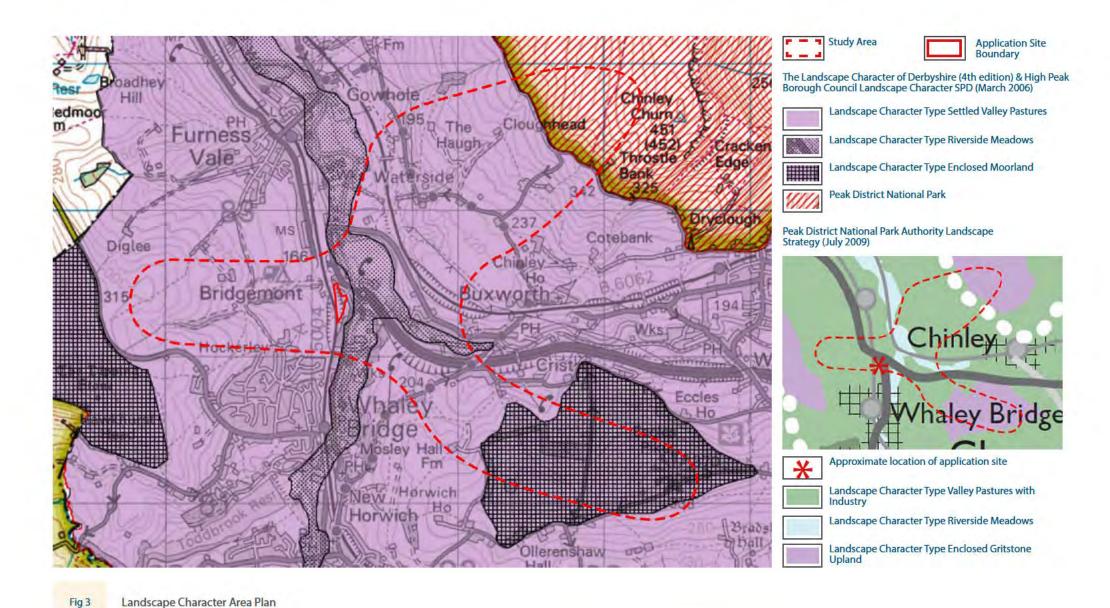
Moorland as follows:

3.34

'This is an open and elevated landscape, largely bare of trees, with expansive views over the settled valleys. Broad rolling hilltops... The field pattern is regular and enclosed with dry gritstone walls. Settlement is confined to isolated farmsteads, sheltered by small groups of trees.'

The Peak District National Park Authority Landscape Strategy describes the Enclosed Gritstone Uplands as follows:

'An enclosed upland landscape associated with high, gently undulating upland tops. This is a landscape of isolated stone farmsteads, straight roads and regular fields enclosed by drystone walls.'



Heritage Assets

3.35 There are no listed buildings or heritage assets within the site. There are several listed buildings and structures within the wider study area generally associated with surrounding farmsteads or the Peak Forest Canal, the closest of which to the site is Grade II Listed aqueduct/horse tunnel located approximately 100m to the south-east.

Derbyshire County Council's Areas of Multiple Environmental Sensitivity (AMES)

- 3.36 In order to respond to a range of requests from various bodies and organisations,
 Derbyshire County Council's Conservation and Design Section developed a methodology for reviewing known environmental data within a landscape spatial framework. A copy of the document and associated map is contained within Appendix 5 and an inset plan which locates the application site is contained within Appendix 6.
- 3.37 The methodology adopted an holistic approach to identify areas of landscape of 'multiple environmental sensitivity' relating to ecology, the historic landscape environment and visual unity.

3.38 The methodology states:

'In general terms those landscapes of highest sensitivity to change will be areas where the landscape remains intact both visually and structurally, have strong historic and cultural identity, and contain many widespread seminatural habitats with associated linkages appropriate to the character of the area.'

3.39 The study defined parts of the county that were outside the main urban areas as being within one of three possible categories as follows:

- Primary Significance where an LDU (Land Description Unit) was recorded as significant for all three of the individual datasets;
- Secondary Significance where an LDU was recorded as significant in two of the individual datasets;
- Not Strategically Sensitive.

The site, along with the entire housing area of Bridgemont and surrounding housing areas of Whaley Bridge, Chinley and Furness Vale appear to be located within an area of Secondary Significance.

3.40

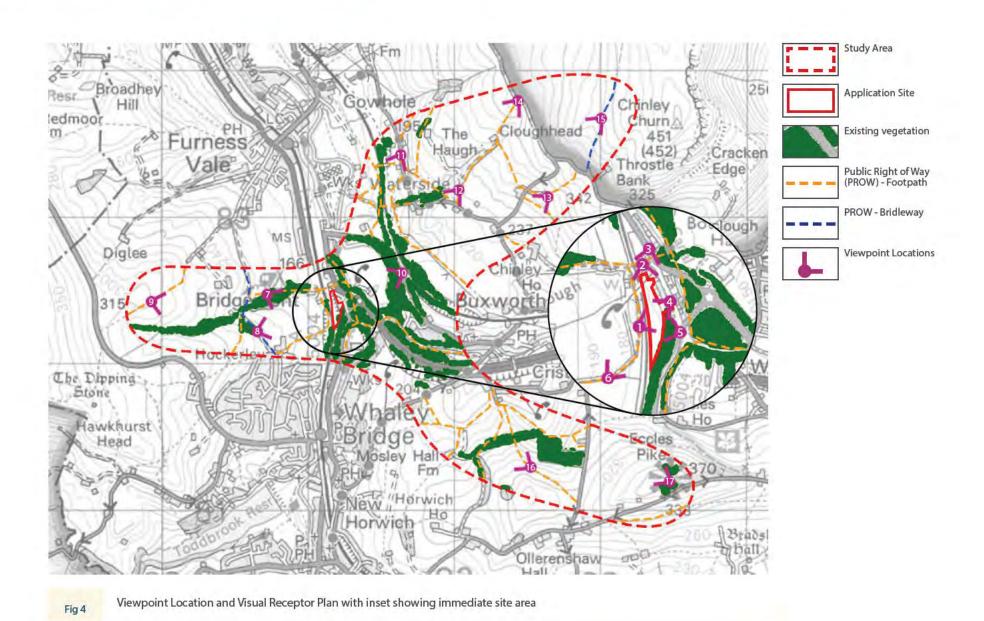
3.41 To the north-east of the study area a small portion of land that lies to the west of the Peak District National Park boundary, is located within an area of Primary Significance.

	Landscape Receptors	3.46	The landscape value of Landscape Character Type Riverside Meadows is considered to be		
3.42	The Landscape Receptors for this assessment comprise the following:		Medium.		
•	The site and its immediate context	3.47	The landscape value of Landscape Character Type Enclosed Moorland & Enclosed Gritstone		
•	Landscape Character Type Settled Valley Pastures & Valley Pastures with Industry Landscape Character Type Riverside Meadows		Upland is considered to be Medium-High.		
•		3.48	The landscape value of the landscape features within the site is considered to be Low.		
•	Landscape Character Type Enclosed Moorland & Enclosed Gritstone Upland		Landscape Sensitivity		
•	The landscape features within the site	3.49	As described within the Methodology (Appendix 1), the sensitivity of the landscape		
	Landscape Value The Methodology sets out how various factors are considered to help determine and inform		is a combined judgement of value (as ascertained within the tables above) and susceptibility to change.		
3.43					
	judgements associated with landscape value. These factors are consistent with GLVIA3 Box 5.1 and Landscape Institute Technical Guidance Note TGN-02-21 Assessing landscape value outside national designations. The landscape value of each of the landscape receptors is judged as being Exceptional, High, Medium, Low or Very Low.	3.50	GLVIA3 defines susceptibility to change as 'the ability of the landscape to accommodate the proposed development without undue consequences for the maintenance of the baseline and/or landscape planning policy or strategy'. Susceptibility to change is graded on a scale of high, medium or low and will vary according to the nature of the		
3.44	The landscape value of the site and it's immediate context is considered to be Medium.		development proposed, which in this instance, is approximately 42 affordable dwellings on land within the Green Belt.		
3.45	The landscape value of Landscape Character Type Settled Valley Pastures & Valley Pastures with Industry is considered to be Medium.				

Visual Receptors

- 3.51 The identification of all potential visual receptors, which in the case of this assessment were predominantly people using PRoWs and road users, was undertaken by way of a desktop survey, followed by site-based survey work. Their identification was primarily determined by the topography of the surrounding area and the presence of screening trees and built form.
- 3.52 The survey work associated with this assessment was undertaken during February 2023 when leaf cover of trees was minimal. Some identified views of the site are filtered by vegetation and there would be seasonal changes to the visibility of the application site, and the features contained therein.
- 3.53 Photographs of the application site, the surrounding landscape and specific viewpoints were taken on the day when the survey was undertaken. Some of the views included wide panoramas and it was therefore considered beneficial to join some of the individual photographs together to produce panoramic views. All photographs were taken using a Canon EOS 6D Mk2 digital SLR camera and specific viewpoints were photographed using a 50mm lens.

- 3.54 The following groups or individual visual receptors have been identified as they experience a view of the application site. The receptors identified and their associated viewpoint photographs do not form an exhaustive list of all possible viewpoints, however they are considered to be representative of the current visual prominence of the application site.
 - People using the following PRoWs;
 HP23/15/1, HP23/14/2, HP23/14/1,
 HP23/10/2, HP23/9/1, HP8/12/2, HP8/12/1
 and HP8/89/1
 - People using PRoW HP8/25/1 within the Peak District National Park
 - People experiencing the Eccles Pike viewpoint and walking the surrounding CROW Access Land;
 - People using the following roads;
 B6062, Dolly Lane, A6 Buxton Road,
 Bridgemont (road through settlement area of Bridgemont) and A5004 Buxton Road
- 3.55 These visual receptors and associated viewpoint photograph locations are described by Figure 4.



Baseline Setting

- People using PRoW HP23/15/1 Viewpoint 1
- 3.56 PRoW HP23/15/1 runs along the western side of the Buxton Railway Line, adjacent to the western boundary of the site. The PRoW is flanked by rough grassland, scrub and occasional tees that filter views somewhat to the east and west of the route.
- 3.57 There are clear views across the railway to the site through gaps in vegetation. Beyond the site existing housing of Bridgemont is visible on lower ground level.
- 3.58 In the distance the hills of the Peak District National Park form the backdrop to the view above the Hope Valley railway line viaduct and areas of woodland.



View from PRoW HP23/15/1 looking east

Baseline Setting

- People using PRoW HP23/14/2 Viewpoint 2
- 3.59 PRoW HP23/14/2 is a short section of footpath that tracks in an east to west direction circa 20m to the north of the site. It passes under the Buxton railway line before meeting PRoWs HP23/14/1 and HP23/15.
- 3.60 Viewpoint 2 represents the view looking south towards the site from the PRoW. The site is visible on elevated ground beyond an outdoor play area that lies to the north of the Village Hall. Housing at Bridgemont is visible to the east and the residential property at Sticky Mires Farm is visible to the west.
- 3.61 The view of the site is partially filtered by a tree on an embankment that forms the northern boundary of the site. The screening effect would be increased in summer months.



View from PRoW HP23/14/2 looking south

Baseline Setting

- People using A6 Buxton Road Viewpoint 3
- 3.62 Viewpoint 3 is taken from the A6 Buxton Road at a distance of circa 40m from the site.
- 3.63 The A6 Buxton Road runs through the northern portion of Bridgemont before reaching the roundabout to the south-east of the site providing access to Whaley Bridge and surrounding areas to the east including Chinley and Chapel-en-le-Frith.
- 3.64 A portion of the site is visible on elevated ground to the west and south of the Village Hall. Views of the site are likely to be significantly restricted when the intervening vegetation is in leaf.



View from A6 Buxton Road looking south

Baseline Setting

People using Bridgemont (access road through Bridgemont settlement area) – Viewpoint 4

- 3.65 Viewpoint 4 is taken from the original section of the main road that has been diverted. This section of road is now a no-through road that provides access to the southern part of the settlement area of Bridgemont. It represents the view looking west, through the former pub's car park, towards the site along the proposed site access.
- 3.66 The site is clearly visible on elevated ground above and beyond the car park in the foreground of the view. The southern most portion of the site is screened by the woodland block that wraps around the

south-eastern boundary of the site. The northern most portion of the site is screened by housing that lines the road through Bridgemont.



View from Bridgemont looking west towards proposed site access

Baseline Setting

People using A5004 - Viewpoint 5

- 3.67 Viewpoint 5 is taken at a distance of circa 60m to the south-east of site on the A5004 that runs north-south through Whaley Bridge. It represents the view when looking west on the approach to Whaley Bridge from the roundabout to the west of the site that joins the A6.
- 3.68 The view of the site is filtered through a block of woodland that sits on an embankment forming the site's south-eastern boundary. The screening effect of this woodland block would be significantly increased when trees are in leaf.

3.69 Housing at Bridgemont is visible to the north of the woodland.



View from A5004 Buxton Road looking west

Baseline Setting

People using PRoW HP23/15/1 - Viewpoint 6

- 3.70 Viewpoint 6 is taken from PRoW HP23/15/1 at an elevation of 185m AOD and a distance of circa 150m from the site. It represents the view on the approach to the site from the west.
- 3.71 Intervening field boundary vegetation filters the view towards the site with partial views of the site visible through gaps in the vegetation. Beyond the site the rooftops of housing at Bridgemont is visible on lower ground. The hills of the Peak District National Park form the backdrop to the view, with scattered farmsteads and wooded cloughs visible across the hillside.
- 3.72 Given that there are houses located behind the viewer on the northern edge of Whaley Bridge, the open ground (which is Green Belt), forms a clear gap between the built form at Whaley bridge to the south and Bridgemont to the north.



View from PRoW HP23/15/1 looking north-east

People using PRoW HP23/14/1 - Viewpoint 7

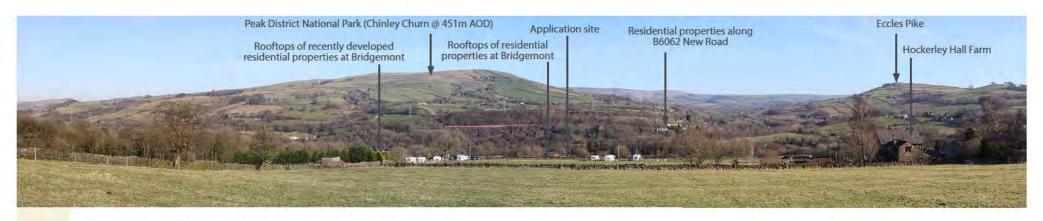
- 3.73 Viewpoint 7 is taken from PRoW HP23/14/1 at an elevation of 200m AOD and a distance of circa 330m from the site. The PRoW crosses a field before joining a wooded valley and entering Bridgemont via Ringstone Works to the north-west of the site.
- 3.74 Views towards the site are heavily filtered by intervening vegetation of the wooded valley, known as Ringstone Clough. The site is just discernible through gaps in



View from PRoW HP23/14/1 looking east

Baseline Setting

- People using PRoW HP23/10/2 Viewpoint 8
- 3.79 Viewpoint 8 is taken from PRoW HP23/10/2 at an elevation of 225m AOD and a distance of circa 580m from the site. The hills of the Peak District National Park and Eccles Pike are visible in the distance to the east.
- 3.80 The site is visible beyond the caravan park, with rooftops of housing at Bridgemont visible to the west on lower ground. Views of the site are partly filtered by intervening vegetation along field boundaries, the screening effects of which would vary on a seasonal basis due to the presence and absence of leaf cover.
- 3.81 Beyond the site the heavily wooded river valley winds through the surrounding hills with small areas of settlement and the Hope Valley Railway viaduct visible between trees.
- 3.82 Scattered farmsteads, pylons and wooded cloughs cloughs interrupt the lower slopes of the valley side beyond the site, whereas the upper slopes are simply subdivided by walled field boundaries.



View from PRoW HP23/10/2 looking east

Baseline Setting

- People using PRoW HP23/9/1 Viewpoint 9
- 3.83 Viewpoint 9 is taken from PRoW HP23/9/1 at an elevation of 300m AOD and a distance of circa 1.4km from the site.
- 3.84 The hills of the Peak District National Park and Eccles Pike form the background of this expansive view. Larger areas of woodland are visible lower down along the river valley interspersed with scattered farmsteads and small settlement areas. The site is screened by intervening vegetation of the wooded valley that lies to the west of the site. The rooftop of the residential property at Sticky Mires Farm, which is adjacent to the site's western boundary, is just discernible above this area of woodland.



View from PRoW HP23/9/1 looking east

People using B6062 - Viewpoint 10

- 3.85 Viewpoint 10 is taken from the B6062 adjacent to the Hope Valley Railway viaduct at an elevation of 180m AOD and a distance of circa 500m from the site.
- 3.86 The wooded river valley forms the middle ground of the view, amongst which the site is discernible through intervening vegetation.
- 3.87 The residential property at Sticky Mires Farm to the west of the site is visible and rooftops of the recently constructed housing north of the site are visible although filtered by intervening vegetation.

3.88 The limited, partial views of the site will only be experienced on a seasonal basis due to the presence and absence of leaf cover.



VP10

View from B6062 looking west

Baseline Setting

- People using Dolly Lane Viewpoint 11
- 3.89 Viewpoint 11 is taken from Dolly Lane looking south-west towards the site, at an elevation of 190m AOD and a distance of circa 1km from the site. Settlement areas of Whaley Bridge and Furness Vale are visible above the woodland and tree cover that occupies the lower parts of the valley.
- 3.90 Housing at Bridgemont is mostly screened by intervening vegetation although some rooftops are discernible set amongst the tree cover. Views of the site are heavily filtered by intervening vegetation within the river valley. The limited, partial views of the site will only be experienced on a seasonal basis due to the presence and absence of leaf cover.



View from Dolly Lane looking south-west

Baseline Setting

- People using PRoW HP8/12/2 Viewpoint 12
- 3.91 Viewpoint 12 is taken from PRoW HP8/12/2 looking south-west towards the site, at an elevation of 240m AOD and a distance of circa 1km from the site. The foreground of the view is cluttered with fencing, signage, telegraph poles and overhead power lines.
- 3.92 Scrub and tree planting filter views to southwest. A portion of the site is visible through a gap in vegetation. The settlement area of Whaley Bridge is visible on the hillside beyond the site to the south.



View from PRoW HP8/12/2 looking south-west

Baseline Setting

People using PRoW HP8/14/1 - Viewpoint 13

- 3.93 Viewpoint 13 is take from HP8/14/1 at an elevation of 300m AOD and a distance of circa 1.7km from the site. Scattered farmsteads across the gently sloping agricultural landscape make up the foreground of this expansive view. In the distance the settlement areas of Whaley Bridge and Furness Vale are visible to the south and north of the site respectively.
- 3.94 From this elevated viewpoint the site is just discernible set amongst the woodland cover of the river valley. Rooftops of housing at Bridgemont to the east of the site are barely discernible above the top of intervening vegetation.

3.95 The uniform rooftops of recently constructed housing at Bridgemont are visible on slightly elevated ground to the north of the site, partially filtered through intervening vegetation. The residential property at Sticky Mires Farm is more clearly visible on elevated ground to the west of the site.



View from PRoW HP8/14/1 looking south-west

Baseline Setting

People using PRoW HP8/12/1 - Viewpoint 14

- 3.96 Viewpoint 14 is taken from PRoW hp8/12/1 at an elevation of 310m AOD and a distance of circa 1.9km from the site. The PRoW runs north-east to south-west and maintains a direct view towards the site.
- 3.97 The site is discernible amongst surrounding woodland of the river valley. The rooftops of housing at Bridgemont are barely discernible amongst the intervening vegetation. On higher ground, the residential property at Sticky Mires Farm and recently constructed housing to the north of the site, are discernible above intervening vegetation.

3.98 The settlement area of Whaley Bridge is visible in the distance amongst the expansive backdrop of the Peak District National Park.



View from PRoW HP8/12/1 looking south-west

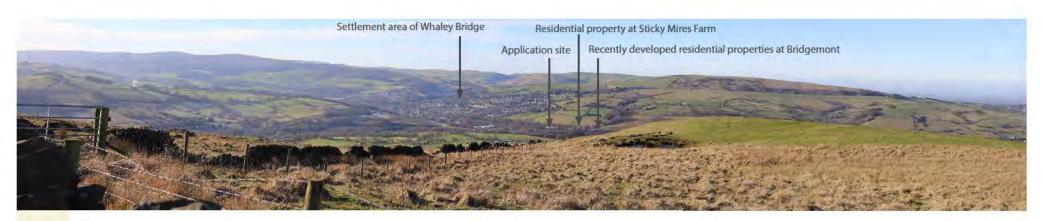
Baseline Setting

People using PRoW HP8/25/1 within the Peak District National Park - Viewpoint 15

- 3.99 Viewpoint 15 is taken from HP8/25/1 at an elevation of 390m AOD and a distance of circa 2.2km from the site.
- 3.100 Rough grassland and a small pond with drystone wall lining the field boundary form the foreground of the view. The site is just discernible in the middle ground amongst the woodland cover of the river valley. The rooftops of housing on lower ground at Bridgemont is also just about discernible amongst the tree cover. The residential property at Sticky Mires Farm to the west of

the site and recently constructed housing to the north of the site is more clearly visible on elevated ground.

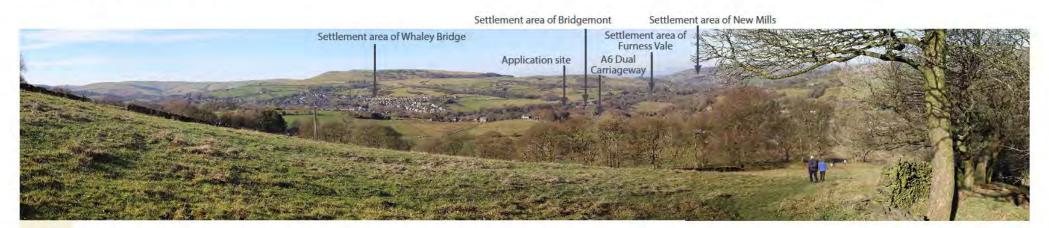
3.101 Beyond the site, the settlement area of Whaley Bridge can be seen set within the valley, extending up the hillside to its west, yet contained by the higher ground of the surrounding Peak District including Black Hill, Sponds Hill, Shining Tor and Ladder Hill amongst others.



View from PRoW HP8/25/1 looking south-west

Baseline Setting

- People using PRoW HP8/89/1 Viewpoint 16
- 3.102 Viewpoint 16 is taken from PRoW HP8/89/1 looking north-west, at an elevation of 280m AOD and a distance of circa 1.7km from the site.
- 3.103 The Settlement areas of Whaley Bridge and New Mills are visible on the hillside in the background of the view. Whaley Bridge is set below the backdrop of higher ground associated with Whaley Moor and the peak of Black Hill. Rooftops of housing at Bridgemont is discernible above intervening woodland. Recently constructed housing at Bridgemont, north of the site, is more clearly visible on slightly elevated ground.
- 3.104 The site is barely discernible to the west of Bridgemont, heavily filtered through vegetation. The rooftop of the nearby residential property known as Sticky Mires Farm can be seen above and amongst the intervening vegetation.
- 3.105 There is a glimpsed view of the dual carriageway of the A6 to the east of the site.

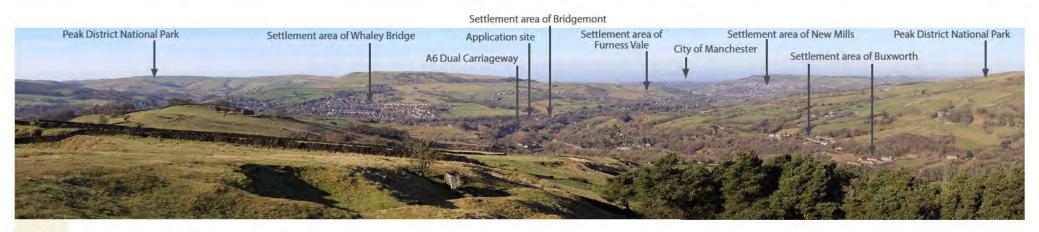


View from PRoW HP8/89/1 looking north-west

Baseline Setting

- People using Eccles Pike Viewpoint 17
- 3.106 Viewpoint 17 is taken from Eccles Pike at an elevation of 360m AOD and a distance of circa 2.5km from the site.
- 3.107 From this distant, elevated viewpoint there are long distant, panoramic views across the High Peak and the Peak District National Park. On the sky line the city of Manchester can be discerned circa 26km to the north-east.
- 3.108 In the middle ground of the view settlement areas of Whaley Bridge, Furness Vale, New Mills and Buxworth are visible on the hillsides of the surrounding landscape.

- 3.109 On lower ground the A6 dual carriageway,
 Hope Valley Railway and scattered farmsteads
 and small areas of settlement are visible
 amongst the woodland cover of the valley
 floor. Rooftops of housing at Bridgemont is
 discernible above intervening vegetation.
- 3.110 Views of the site are heavily filtered by intervening vegetation although it is partially visible to the west of the existing housing at Bridgemont.



View from Eccles Pike looking north-west

Baseline Setting

Sensitivity - Public Views

- 3.111 As set out within the Methodology (Appendix 1) and in GLVIA3, the sensitivity of visual receptors is derived from judgements made regarding the value attached to the view as indicated by planning designations, relationships to heritage assets, associations with art, recognition in guide books/tourist maps or the provision of facilities for their enjoyment (such as parking, sign boards, interpretive material etc.), and the susceptibility of the visual receptor to change, which is indicated by their occupation or activity and the extent to which their attention is focussed on the view.
- 3.112 The value of the views experienced by visual receptors using the PRoW network surrounding the site is considered to be Medium-High. These are attractive views that commonly feature the hills of the Peak District National Park.
- 3.113 The value of the views experienced by visual receptors using the PRoW network within the Peak District National Park and Eccles Pike are considered to be High. These are long distance, panoramic views experienced from unique, elevated viewpoints in the landscape.
- 3.114 The value of the views experienced by visual receptors using the road network is considered to be Low-Medium. The roads are predominantly rural however they are not recognised through planning designation or in relation to heritage assets and are not scenic trails.

Table 3 - Summary of Visual Receptor Sensitivity					
Visual Receptor	Value of the View	Susceptibility to Change	Resulting Sensitivity		
People using PRoW HP23/15/1, HP23/14/2, HP23/14/1, HP23/10/2, HP23/9/1, HP8/12/2, HP8/12/1 and HP8/89/1	Medium- High	High – People using the routes for walking are engaged in outdoor recreation with a focus upon the enjoyment of the landscape.	Medium- High		
People using PRoW HP8/25/1 (within the Peak District National Park) and Eccles Pike	High	High – People using the routes for walking are engaged in outdoor recreation with a focus upon the enjoyment of the landscape.	High		
Road Users – People using B6062, Dolly Lane, A6 Buxton Road, Bridgemont (road through settlement area of Bridgemont) and A5004 Buxton Road	Low- Medium	Low –The road corridors are dominated by vehicles with people using the routes for access, rather than for their enjoyment of the views/landscape.	Low- Medium		

Introduction

The assessment of landscape and visual effects will be undertaken with reference to and using aspects of the guidance found within `Guidelines for Landscape and Visual Impact Assessment` 3rd Edition, published by the Landscape Institute (LI) and the Institute of Environmental Management & Assessment (IEMA) 2013 (termed GLVIA3 hereafter).

As stated within GLVIA3 paragraph 1.20, the guidelines are not prescriptive and the approach and methodology has been tailored to the specific requirements of the proposals.

GLVIA3 recommends the following five key stages in the assessment of landscape and visual effects:-

- Scope;
- · Establishing the landscape and visual baseline;
- Describing the landscape and visual effects;
- Assessing the significance of the landscape and visual effects:
- Ascertaining the overall significance of landscape and visual effects

These five stages are applied separately to the landscape assessment and the subsequent visual assessment. GLVIA3 recognises that landscape and visual assessments are separate, although linked procedures.

Landscape effects are the predicted effects on the landscape as a resource in its own right. Landscape effects can be generated by a developments effect upon the physical landscape and or upon its character, fabric and quality. These could include direct physical impacts upon landscape elements, but also includes aesthetic, perceptual and experiential aspects of a landscape which may contribute to an existing landscape character.

Visual effects are the predicted changes to a view and the related impact on the general visual amenity experienced by people (visual receptors). The various visual receptor groups comprise individuals or groups of people that experience a view of the application site from a publicly accessible location. They will typically include the users of Public Rights of Way, users of recreational facilities, pedestrians and users of a variety of forms of transport such as the drivers and passengers of vehicles, cyclists or rail passengers.

With regards to the visual amenity of the residents of private properties, GLVIA3 recommends that private views can be dealt with by a separate residential amenity assessment as in planning terms, residents are not entitled to a view. The presence of residents experiencing a view of the application site and the nature of the views experienced will be acknowledged and considered within the baseline. The LVIA will only fully assess the visual effects upon the receptors that experience publicly accessible views.

Study Area

The overall study area for the landscape and visual assessment will be established by undertaking a desk-based survey and refined by subsequent site-based survey work.

The site-based work will be undertaken by a chartered member of the Landscape Institute with experience of landscape and visual assessment.

Site-based work will initially involve travelling throughout the area around the site, in order to inform and confirm the extent of the study area.

The study area will therefore include the site and the wider landscape which could be influenced by the development proposals and the extent of the area from which the development is potentially visible.

This desk and subsequent site-based work will also establish the representative viewpoints for the visual appraisal.

Landscape Effects

GLVIA3 paragraph 5.1 states 'An assessment of landscape effects deals with the effects of change and development on landscape as a resource.'

The Landscape Baseline - Desk Based Assessment

The assessment will include a review of the relevant planning policy and other guidance and relevant information including:

- National Planning Policy Framework (NPPF 2012) and subsequent revision (July 2021);
- High Peak Borough Council Local Plan (April 2016);
- Whaley Bridge Neighbourhood Plan;
- The Landscape Character of Derbyshire (4th edition);
- Peak District National Park Authority Landscape Strategy (July 2009)
- Supplementary Planning Documents;
- · Ordnance Survey mapping;
- Historic Mapping;
- · Defra (MAGIC) website;
- · Online aerial mapping;
- Sustrans website; and
- Published walking or cycling routes.

The Landscape Baseline - Site Based Assessment

Site assessment work will initially entail travelling around the confirmed study area by car/cycle and by foot to understand the landscape features within the site and the surrounding area and to confirm the accuracy of the relevant published character assessments.

The landscape baseline will incorporate descriptions of the application site and the surrounding landscape, before referencing all published landscape character assessments and ascertaining the presence of any

designated heritage assets such as Conservation Areas, Listed Buildings and Scheduled Ancient Monuments.

GLVIA3 paragraph 5.33 states that the landscape baseline should map describe and illustrate the character of the landscape and its individual elements and aesthetic and perceptual aspects, emphasising any key characteristics that contribute to the distinctive character of the landscape. It also states that the condition of the landscape should be indicated with reference to elements therein, such as buildings, hedgerows or woodland.

Landscape Value

In accordance with paragraph 5.44 of GLVIA3, the Landscape Baseline will also consider the value of the landscape resource within the study area.

GLVIA3 paragraph 5.45 states 'the value of the landscape receptors will to some degree reflect landscape designations and the level of importance which they signify, although there should not be over reliance on designations as the sole indicator of value.'

The fact a landscape is not subject to a designation, does not mean that it does not have any value. Where there is no evidence to indicate landscape value, the assessment will utilise an approach akin to the Box 5.1 assessment as set out within GLVIA3 paragraph 5.28 and Landscape Institute Technical Guidance Note TGN-02-21, Assessing landscape value outside national designations, which draw on the factors that

are generally agreed to influence value, which can be Exceptional, High, Medium, Low or Very Low. In addition to acknowledging the presence of any landscape designations, these factors comprise the following:

- Landscape Condition (Table 1 below to be utilised to assist judgements on condition): A measure of the physical state of the landscape. It may include the extent to which typical character is represented in individual areas, the intactness of the landscape and the condition of individual elements.
- Distinctiveness: Consideration as to whether the landscape has a strong sense of identity through reference to relevant Landscape Character Assessments.
- Natural Heritage: Landscape with clear evidence of ecological, geological, geomorphological or physiographic interest which contribute positively to the landscape.
- Cultural Heritage: Landscape with clear evidence of archaeological, historical or cultural interest which contribute positively to the landscape.
- Recreational Value: Landscape offering recreational opportunities where experience of landscape is important.
- Perceptual (scenic): Landscape that appeals to the senses, primarily the visual sense.
- Perceptual (wildness and tranquillity): Landscape with a strong perceptual value notably wildness, tranquillity and/or dark skies.
- Associations: Landscape which is connected with notable people, events or the arts.

 Functional: Landscape which performs a clearly identifiable and valuable function, particularly in the healthy functioning of the landscape.

Assessment of Landscape Effects

Having established the landscape baseline, the relevant landscape components or 'receptors' are identified and will normally comprise physical landscape features, such as trees, hedgerows, dry-stone walls etc. and identified landscape character areas within the study area.

Having ascertained the landscape receptors, the assessment will then identify interactions between those receptors and the development proposals at Year 1.

In order to determine the significance of the potential landscape effects which may result from the development, the sensitivity and the magnitude of effect of each of the landscape receptors must be established. The sensitivity and magnitude of effect can then be combined to ascertain the significance of effect for the landscape receptors – see Table 4.

Landscape Sensitivity

Sensitivity determines the degree to which individual landscape receptors may be affected by a development proposal. In order to establish the sensitivity of the relevant landscape receptors, their susceptibility to specific change must be considered alongside a judgement on their respective value (the value, susceptibility and associated sensitivity of the landscape resource is established within the Landscape Baseline).

Susceptibility to change means the ability of the landscape receptor to accommodate the type of the proposed development (whether it be housing, warehouses, a wind farm etc.), without undue consequences for the maintenance of the baseline and/or the achievement of landscape planning policies and strategies and with reference to Table 2 below, is graded on a scale of High, Medium or Low.

Combining the value and susceptibility judgements attributed to each landscape receptor then informs a judgement regarding their sensitivity, which is graded on a scale of High, Medium or Low.

Magnitude of Effect

GLVIA3 recommends that the magnitude of effect upon landscape receptors is assessed using three considerations as follows:

- The size or scale of the change to the landscape resulting from the implementation of the development proposals - Determining the size or scale of landscape effect takes account of landscape elements which are lost and those which are improved, the degree to which aesthetic or perceptual aspects of the landscape are altered and whether the effects change the key characteristics of the landscape;
- The geographical extent of the area influenced by the development proposals - this could comprise the site only, its immediate setting or possibly the wider landscape at the scale of the landscape type or character area within which the development is

- located, or also at a larger scale where more than one landscape type or character area within the wider study area is influenced;
- The duration of the effect is judged on a scale of short term (0-6 years), medium term (7-15 years) and long term (15 years and beyond). Reversibility is a judgement about the prospects and the practicality of a particular effect being reversed and is judged on a scale of reversible, partially reversible and permanent. For example, housing can be considered permanent, whereas a wind turbine can be considered as reversible as they have a limited life and could be removed and the land reinstated.

The overall magnitude of effect is judged as High, Medium, Low or Negligible and this judgement can be adverse or beneficial. Table 3 below describes the magnitude of effect criteria for the landscape assessment.

Landscape Effects

In order to draw conclusions about the nature of landscape effects, the separate judgements about the sensitivity of the landscape receptors and the magnitude of the landscape effects need to be combined to allow a final judgement to be made (see Table 4 below). The resulting effect may be Major, Moderate, Minor or Negligible and can be either beneficial or adverse. It must be noted that the table is a guide to aid the assessor in the decision-making process, therefore in some instances, the ascertained level of effect may not be consistent with the sensitivity/magnitude combinations given in Table 4.

Condition	Criteria
Exceptional	 Strong landscape structure, characteristics, patterns, balanced combination of landform and landcover; Appropriate management for land use and landcover; Distinct features worthy of conservation; Strong sense of place; and No detracting features.
High	 Robust landscape structure, characteristics, patterns and balanced combination of landform and landcover; Appropriate management for land use and landcover with potential scope to improve; Distinct features worthy of conservation; Sense of place; and Occasional detracting features;
Good	 Recognisable landscape structure, characteristic patterns and combinations of landform and landcover are still evident; Scope to improve management for land use and land cover; Some features worthy of conservation; and Some detracting features.
Ordinary	 Distinguishable landscape structure, characteristic patterns of landform and landcover; Scope to improve management of vegetation; Some features worthy of conservation; and Some detracting features.
Low	 Weak landscape structures, characteristic patterns of landform and landcover are often masked by land use; Mixed land use evident; Lack of management and intervention has resulted in degradation: and Frequent detracting features.
Very Low	 Degraded landscape structure, characteristic patterns and combinations of landform and landcover are masked by land use; Mixed land use dominates; Lack of management/intervention has resulted in degradation; and Extensive detracting features.
Damaged	 Damaged landscape structure; Single land use dominates; Disturbed or derelict land requires treatment; and Detracting features dominate.

Table 1 – Landscape Condition

Level of Susceptibility	Definition
Higher Susceptibility	 The landscape is of an open nature/ is large scale/has natural topographical variations and/or there is a negligible/low level of containment so is susceptible to the introduction of uncharacteristic elements/features; The landscape is of a small, intimate scale that is susceptible to the introduction of uncharacteristic elements/features; There are historic assets/features present, such as remnant parkland and semi-natural woodland; There is an overriding rural character; Many of the valued existing landscape characteristics and features would be difficult to replace or mitigate, although it may be possible to enhance/mitigate to some extent; There are higher levels of wildness and tranquillity.
Lower Susceptibility	 There are limited variations in the topography; There is a limited presence of natural landform; The landscape is of a more enclosed nature that results from a strong woodland structure; Predominantly agricultural land which is intensively farmed, leaving limited semi-natural habitat; The is a perceived prominence and presence of human activity.

Table 2 – Indicators of Landscape Susceptibility Change

Landscape Assessment Timeframes

The landscape effects are considered at one point in time as follows:

Year 1 – Operational

Where appropriate, medium/longer term effects are considered via an appropriate narrative.

Visual Effects

GLVIA3 paragraph 6.1 states 'An assessment of visual effects deals with the effects of change and development on the views available to people and their visual amenity.'

The Visual Baseline - Desk and Site Based Assessment

The desktop studies undertaken, combined with sitebased analysis will inform the visual baseline for the appraisal. The site-based work will be undertaken by a chartered member of the Landscape Institute with experience of landscape and visual assessment.

Site-based work will initially involve travelling throughout the area surrounding the site in order to ascertain levels of visibility on the ground (taking account of screening trees, hedgerows and built form), in order to inform and confirm the extent of the study area, the key relevant visual receptors (individuals or groups of people who experience a view of the application site) and the associated representative viewpoints. This information will be set out within the assessment with descriptions of the views experienced.

Viewpoint photography will be undertaken in accordance with Landscape Institute Technical Guidance Note 06/19 – Visual Representation of Development Proposals, using a digital single lens reflex camera (Canon EOS 6D MkII) with a 50mm F/1.4 USM lens (guidance recommends the use of a 50mm lens at it provides imagery akin to that of the human eye).

It is important to note that the visual receptors and in particular, the representative viewpoints are representative of the visual prominence of the application site and will not necessarily form an exhaustive list of all receptors and associated viewpoints.

Assessment of Visual Effects

In order to determine the significance of the potential visual effects which may result from the development, the sensitivity and the magnitude of effect associated with each of the visual receptors must be established. The sensitivity and magnitude can then be combined to ascertain the nature of the anticipated visual effect for each individual visual receptor.

Receptor Sensitivity

Sensitivity determines the degree to which visual receptors will be affected by a development proposal. In order to establish the sensitivity of the visual receptors, their susceptibility to specific change in the views experienced, must be considered alongside a judgement on the respective value of those views. The resulting sensitivity is graded on a scale of High, Medium and Low.

Magnitude of Effect	Typical Criteria
Higher (adverse or beneficial)	Major alteration to key features or characteristics in the existing landscape and or the introduction of elements considered totally uncharacteristic/ characteristic. Typically, this would be where there would be a great scale of change to the character of the landscape for the long or medium-term.
Medium (adverse or beneficial)	Partial alteration to key features or characteristics of the existing landscape and or the introduction of prominent elements. Typically, this would be where there would be a notable scale of change to the character of the landscape for the medium and long- term; or where there would be a great scale of change on the landscape for the short-term.
Low (adverse or beneficial)	Minor alteration to key features and characteristics of the existing landscape and or the introduction of features which may already be present in the landscape. Typically, this would be where there is a notable or low scale of change to the character of the landscape for the short-term; or where there would be a low scale of change on the landscape in the medium or long-term.
Negligible (adverse or beneficial)	A very minor alteration to key features or characteristics of the existing landscape. Typically, this would be where in the short, medium or long term the scale of change on landscape character would be barely perceptible.

Table 3 – Criteria for the Assessment of the Magnitude of Effect of Landscape Character

Susceptibility – The susceptibility of different visual receptors to potential changes in views and visual amenity is subject to the occupation or activity of people experiencing a view and the extent to which their attention is focussed on the views (see Table 5).

GLVIA3 paragraphs 6.32 to 6.35 provides general guidance upon the levels of susceptibility associated with different, yet common types of visual receptor. A level of Susceptibility to Change of High, Medium or Low will be attributed to each of the visual receptors.

Judgements associated with assigning a level of susceptibility to the visual receptors will not necessarily always accord with Table 5. As indicated with Road Users, the susceptibility may vary up or down from the values set out within Table 5 and instances where such variations occur, the basis for the judgement will be set out within the assessment.

Value of the View – The value of the views experienced is determined as High, Medium or Low, with reference to GLVIA3 paragraph 6.37, which states that the following should be taken account of:

- recognition of the value attached to particular views, for example in relation to heritage assets, or through planning designations; and
- Indicators of the value attached to views by visitors, for example through reference to a view in a guidebook or on a tourist map, provision of facilities for their enjoyment (such as parking places, sign boards and interpretative material) and references to them in literature and art that indicates a highly

valued view, which often can be experienced by many people.

Receptor Sensitivity – The sensitivity of the visual receptors is ascertained by combining the judgements associated with their susceptibility and the value of the views they experience, to inform a judgement regarding their sensitivity, which is graded on a scale of High, Medium or Low.

Magnitude of Effect

Each of the visual effects identified will be evaluated in terms of its size or scale, its geographical extent of the area influenced and its duration and reversibility. The resulting magnitude of effect is graded on a scale of High, Medium, Low or Negligible.

When considering the size or scale of the change in the view the following criteria are considered:

- loss or addition of features within the view including the proportion of the view occupied by the proposed development e.g. introducing housing into a view where housing is already present will represent a lower level of change than the introduction of housing into a view where there is no housing present;
- the degree of contrast or integration of any new features or changes in the landscape with the existing or remaining landscape elements and characteristics in terms of scale, mass, form, height and colour; and

		Magnitude						
		High	Medium	Low	Negligible			
ivitv	Low	Moderate	Minor/ Moderate	Minor	Negligible			
Sensitivity	Medium	Major/ Moderate	Moderate	Minor/ Moderate	Negligible			
	High	Major	Major/ Moderate	Moderate	Negligible			

Table 4 – Landscape Effects - Method for Assisting Decision Making When Determining Landscape Effects

Visual Receptor	Susceptibility to Change
Users of Public Rights of Way and other recreational routes	High
Public Open Space and visitor attractions where views contribute to the experience	High
Road Users (drivers and passengers of vehicles, cyclists and pedestrians) – Susceptibility could be lower from main roads or higher from rural lanes/tourist routes	Varies
Rail Passengers	Medium/ Low
Golfers	Medium/ Low
Users of sports pitches	Low
Employees/workers in their workplace	Low

Table 5 – Susceptibility to Change

 The nature of the view of the development proposal in terms of the length of time over which it will be experienced and whether the views will be full, partial or glimpses.

The geographical extent of a visual effect will vary with different viewpoints and is likely to be reflected by the following:

- The angle of view in relation to the main activity of the receptor – changes to direct views will generally be considered to be of greater importance than changes to oblique views;
- The distance of the viewpoint from the proposed development; and
- The extent of the area over which the changes would be visible.

The duration of visual effects is judged on a scale of short term (0-6 years), medium term (7 to 14 years), to long term (15 years and beyond), taking account of the establishment of proposed planting. Reversibility is a judgement about the prospects and the practicality of a particular effect being reversed and is judged on a scale of reversible, partially reversible and permanent. For example, housing can be considered permanent, whereas a wind turbine can be considered as reversible, as they have a limited life and could be removed and the land reinstated.

The overall magnitude of effect is judged as High, Medium, Low or Negligible and this judgement can be adverse or beneficial. Table 6 below describes the magnitude of effect criteria for the visual appraisal.

Visual Effects

In order to draw conclusions about the anticipated levels of visual effect, separate judgements about the sensitivity of the visual receptors and the magnitude of the visual effects need to be combined to allow a final judgement to be made (see Table 7). The resulting significance of effect may be Major, Moderate, Minor or Negligible and can be either beneficial or adverse. It must be noted that the table is a guide to aid the assessor in the decision-making process, therefore in some instances, the ascertained level of visual effect may not be consistent with the sensitivity/magnitude combinations given in Table 7.

GLVIA3 paragraph 6.44 states 'In making a judgement about the significance of the visual effects, the following points should be noted:

- Effects on people who are particularly sensitive to changes in views and visual amenity are more likely to be significant;
- Effects on people at recognised and important viewpoints or from recognised scenic routes are more likely to be significant;
- Large-scale changes which introduce new, noncharacteristic or discordant or intrusive elements into the view are more likely to be significant

than small changes or changes involving features already present within the view.'

Visual Appraisal Timeframes

The visual effects are considered at one point in time as follows:

Year 1 - Operational

Where appropriate, additional narrative regarding longer term visual effects will be provided within the visual tables.

This assessment does not specifically assess landscape and visual effects for Year 15, however where relevant the longer term effects of the development proposals are considered within the narrative associated with the magnitude of effect.

Magnitude of Effect	Typical Criteria
High (adverse or beneficial)	Major alteration to the existing view and/or the introduction of elements considered totally uncharacteristic/characteristic. Typically, the development will be in close proximity to the receptor, with a large proportion of the view affected with little or no filtering. The scale of change would be great and would exist from the medium-term and beyond.
Medium (adverse or beneficial)	Partial alteration to the existing view and or the introduction of prominent elements in the view. Typically, the development would affect a moderate proportion of the view up to and beyond the medium term or the development would be seen in close proximity, with a large proportion of the view affected in the short term.
Low (adverse or beneficial)	Minor changes to the existing view and or the introduction of features that are already present within the view. Typically, this would result from a low scale of change to the existing view; where a moderate to low proportion of the view would be affected in the short term; where the development would be visible in distant views beyond the medium term; where only a small proportion of the view is affected beyond the medium term; or, where high degrees of screening/filtering reduce the effect beyond the medium term.
Negligible (adverse or beneficial)	A very minor alteration to the existing view. Typically, this would result where a development is barely perceptible at any point in time; where the change would be barely perceptible within a longer distance view; where a small proportion of the view is affected; or, where the scale of change from the existing view would be barely perceptible.

Table 6 – Criteria for the Assessment of the Magnitude of Effect on Views

		Magnitude						
		High	Medium	Low	Negligible			
ivity	Low	Moderate	Minor/ Moderate	Minor	Negligible			
Sensitivity	Medium	Major/ Moderate	Moderate	Minor/ Moderate	Negligible			
	High	Major	Major/ Moderate	Moderate	Negligible			

Table 7 – Visual Effects - Method for Assisting Decision Making When Determining Visual Effects

LANDSCAPE TYPE: ENCLOSED MOORLAND

An open, upland-farming landscape on broad rolling hill summits with patches of remnant moorland.

Dry-stone walls enclose regular fields and straight roads join occasional isolated farmsteads.





Key Characteristics

- Moderate to steeply sloping gritstone hills
- Gritstone outcrops on hill summits and steeper slopes
- · Peaty, acidic soils
- Rough grazing and areas of damp pasture with patches of rushes
- Patches of heather, gorse and bilberry, especially where fields are reverting back to moorland
- · Medium to large regular fields bounded by dry-stone walls
- Unwooded landscape other than occasional amenity trees around farmsteads.
- Sparsely scattered gritstone farmsteads some with stone slate roofs
- · Open landscape with expansive views

Geology and Landform

The underlying Millstone Grit strongly influences this upland landscape creating a series of gritstone hills. The gritstone is hard and difficult to erode, which creates these gently rolling hill summits or small upland plateaux. Exposed rock outcrops are frequent on the outcrops are frequent on the steepest slopes forming, in places, small gritstone edges. Some lower lying summits are overlain with drift from Palaeozoic sandstones and shales adding further to the subdued nature of the rolling plateaux.

Soils and Land-Use

The variable nature of the geology and landform gives rise to a diverse range of soil types, all characterised by their acidic, podsolic nature. At higher elevations, the soils are shallow and have a peaty surface layer. On steeper slopes, the soils are well-drained and loamy, whilst over drift and on gentler summits, they are slowly permeable, seasonally waterlogged and fine. All soils remain acidic where they are not limed.

wet moorland. Where pasture has been improved or on free-draining soils then some dairying occurs, although in many areas during the winter there is a high risk of poaching.

The resultant land-use is low

quality pasture for stock rearing on

Ecology

A landscape with widespread patches of semi-natural vegetation, either as heather moorland, with areas of Calluna, cross-leaved heath and bilberry, or acid grassland where Nardus and Mollinia grasses are dominant. Where pasture has been improved through liming and fertiliser applications, then habitat value is low or confined to field margins and road verges. There are also patches of gorse and bracken on steeper, free-draining slopes.

Where drainage is impeded and soils are slowly permeable, then patches of rush pasture with Juncus are locally frequent. At higher elevations and associated with steeper slopes, bare rock is common, providing another valuable habitat. This is an important landscape for ground nesting birds.

Tree Cover

The wet soils, exposure and sheep grazing associated with these upland hills and plateaux, seriously restrict tree growth so this is essentially a treeless landscape. However, there is the occasional small plantation block or tree group in association with occasional isolated farmsteads.

Enclosure

Dry-stone walls constructed from the local gritstone enclose large regular fields. Many of these walls are straight and, together with the regular shaped fields, reflect the relatively late enclosure of this landscape from moorland. Place names like Matley Moor and Matlock Moor reflect the former land cover of these areas.

Transport

The roads are straight and direct, having uniform width verges, again reflecting the late enclosure of this landscape. They connect the sparsely scattered farmsteads established at the time of enclosure.



Straight road

Built Environment

The settlement pattern is dispersed with farmsteads sparsely scattered through the landscape. These are traditionally constructed from the local gritstone with stone slate and Staffordshire blue clay tile roofs.

Summary

An open, upland farming landscape of broad rolling hill summits, formed by upstanding sandstone of the Millstone Grit Series. All the soils are free-draining, coarse loams but, where they are thinnest or under remnant semi-natural vegetation, they become impoverished, acidic and humic.

The present land-use is pastoral although, until the award of parliamentary enclosure, these areas would have been essentially semi-natural. Heather and bilberry would have been prevalent, although the moorland character is evidenced today with sporadic occurrences of gorse and bracken. Where marginal fields have been abandoned, these have quickly reverted back to moor and heath with birch scrub.

Individual sandstone farmsteads are scattered and would have followed the parliamentary enclosure of these areas. This late enclosure is characterised by regular and geometric shaped fields bounded by dry-stone walls. The moorland summits are inherently unwooded and trees are scarce other than those planted around farms for shelter and the occasional patch of colonising birch scrub. This creates an open landscape with expansive views.

The majority of roads are straight with fairly wide uniform width verges and would have been established at the time of parliamentary enclosures. The road verges now function as remnant habitats for many of the seminatural heathland species.

LANDSCAPE TYPE: ENCLOSED MOORLAND

Planting and Management Guidelines

An open, unwooded landscape on broad, rolling hill summits punctuated by occasional small tree groups around farmsteads.

Excluding the Peak District National Park

Primary woodland character: Open/unwooded

Primary tree character: Localised amenity tree groups

Woodland vision: Open/unwooded

Tree vision: Localised amenity tree groups

- Conserve and enhance the tree groups that occur within and around rural settlements and isolated farmsteads.
- · Maintain open character.

Note

At Matlock Moor, there has been large scale afforestation of the landscape by the Forestry Commission to create extensive commercial woodland. Today, local people value this landscape as a recreational resource for walking, cycling and nature conservation. A defining characteristic of Enclosed Moorland is its open and unwooded character. It would be unrealistic and undesirable to remove these large plantation woodlands. However, their visual and biodiversity value could be enhanced by allowing oak, birch and moorland species to develop around the edges as a link and in keeping with their moorland context.

Woodland Species Mix

‡ Amenity trees - appropriate tree species for planting as amenity trees associated with settlement should include locally occurring large woodland species, e.g. Sessile Oak (Quercus petraea), Pedunculate Oak (Quercus robur), and Ash (Fraxinus excelsior).

Dark Peak Character Area 51 Part 1 - 1.12

Dark Peak

LANDSCAPE TYPE: SETTLED VALLEY PASTURES

A settled, pastoral farming landscape on gently sloping lower valley sides, dissected by stream valleys. Dense watercourse trees, scattered boundary trees and tree groups around settlement contribute to a strongly wooded character.





Key Characteristics

- Moderate to steep lower valley slopes dissected by stream valleys
- Poorly draining soils over Carboniferous shale and sandstone
- Pastoral farming with extensive improved pasture
- Bracken in some road verges and rushes associated with damp hollows
- Wooded character associated with tree belts along streams and cloughs, scattered hedgerow trees and tree groups around settlement and farmsteads
- Small irregular fields enclosed by mixed species hedgerows and occasional dry-stone walls
- Network of winding lanes with irregular verges, sometimes sunken on steeper slopes
- Settled landscape of small nucleated settlements and scattered stone farmsteads with stone slate roofs
- Stone terraced housing on lower slopes associated with historic mills
- Enclosed landscape with views filtered by trees

Geology and Landform

A landscape strongly influenced by the underlying geology and defined by the steep to gently sloping lower valley sides of broad upland valleys. Where rivers have eroded through the Millistone Grit they have exposed the underlying shale to create these undulating lower valley slopes. Further variation is created

by small stream valleys, which dissect the main valley as they drain the surrounding high moors.

Soils and Land<u>-Use</u>

The nature of the underlying geology ensures there is variation in the soils. On the lower, less steep slopes, over shale, the soils are slowly permeable, seasonally

waterlogged and loamy, over clay. On the steeper slopes over gritstone, there are coarser loams over rock, or finer loams over slowly permeable subsoil.

The traditional land-use on these soils is stock rearing and dairying with much of the land down to permanent pasture. Grass yield potential is good although there is the risk of poaching on the heavier lower lying soils during wet periods. Some of the steeper, upper slopes over gristone are less intensively grazed and a coarser, more acidic grassland predominates.

Ecology

Much of this landscape is intensively farmed as permanent pasture and improved grassland, and leys have little floristic interest. However, there are some very occasional species-rich hay meadows. Where drainage is impeded or the soils are slowly permeable, patches of wet grassland with Juncus are frequent. On the upper slopes over gritstone, there may be localised patches of acid grassland dominated by Nardus and wavy hair grass.

Dark Peak Character Area 51 Part 1 - 1.13 Where the soils are thinner and freedraining, particularly associated with steep slopes and road verges, heathy plants like bracken, heather and bilberry are locally common.

A network of stream valleys dissecting the main valley sides assist in connecting these patches of habitat in the farmed landscape, which is reinforced by the hedgerow boundaries. These river corridors have dense tree belts and the occasional patch of alder carr. Many of the stream courses have associated ponds and mill ponds that function as important habitats for amphibians. Those that have silted up have now reverted to alder

Several springs and soughs provide wet marshy conditions and lateral water flows, which support isolated patches of species-rich marsh.

Tree Cover

Trees are well represented throughout to give the overall effect of a strongly wooded landscape. Dense tree belts, sometimes wide enough to form woodland bands, occur along narrow, tributary stream valleys dissecting the main valley sides. These combine visually with the scattered trees in the hedgerows to filter the views. Small groups of amenity trees are also found associated with settlement



Bluebell woods

and particularly with dispersed farmsteads. Small remnants of ancient woodland persist and these A well settled landscape containing contribute further to the wooded

At higher elevations, trees are less apparent due in part to the exposure and poorer soils, giving way to a more open moorland landscape. Tree species tend to be broadleaved and pre-dominantly oak and ash. Sycamore is often associated with transport routes, and alder along the watercourses.

Enclosure

A landscape of small, irregular fields enclosed predominantly by hedgerows, although there are occasional and locally frequent walls especially on higher ground. Hedgerows tend to be a mix of species, including holly, hawthorn, hazel and blackthorn. Their species composition suggests that the fields may have been cleared directly from woodland, and that the woodland trees and shrubs were retained to form the hedgerows.

Transport

There is a dense network of winding lanes, with irregular width verges. Sunken lanes are a feature on sloping ground, though they avoid the very steepest slopes. There are also green lanes, some that run just to isolated farmsteads, together with footpaths linking settlements

Much of this landscape has been utilised as transport corridors with maior roads and railways taking advantage of the gentler lower valley slopes. This is particularly notable where the A6 trunk road and railway runs between Whaley Bridge and Disley.

Built Environment

towns, villages, small groups of cottages, and scattered farmsteads. Most traditional buildings are constructed of the local gritstone with Welsh slate and some surviving stone slate roofs.

Much of the build environment has a distinctive architecture relating to the building tradition of the Manchester area and to its industrial heritage, particularly the textile industry.



Many settlements like Chapel-enle-Frith, Whaley Bridge and New Mills, have spread out along lower valley slopes and owe their origin to the harnessing of water power and their expansion to the industrial age. Terraces of weavers' cottages, some with sloping roof lines, and later Victorian terraces are a characteristic feature of the valley



Stone terrace houses

Summary

This is an upland landscape associated with the lower slopes of broad upland valleys formed by rivers eroding through the Millstone Grit to expose the shale beneath. Tributary valleys that dissect the main valley sides to create an undulating landform provide further interest.

This is a well settled landscape taking advantage of the natural shelter offered by the lower valley sides, the better agricultural soils and the good communications. There are discrete settlements like Whaley Bridge and Chapel-en-le-Firth, small groups of cottages and industrial terraces, and scattered farmsteads. There is a dense network of lands connecting the villages with the dispersed farmsteads, with main roads and railway lines hugging the lower slopes immediately off the flood plain.

Trees are well represented throughout giving the overall impression of a well-wooded landscape. Many of the tributary valleys feeding the main valleys form wooded cloughs, some of ancient origin, and these woodland belts are supplemented by scattered hedgerow trees, amenity tree groups associated with settlement and secondary woodland along roads and railway lines. Many of the woodlands have an irregular outline reflecting the irregular field patterns and winding lanes.

This is a pastoral landscape and many of the fields are down to permanent improved pasture. However, with altitude, the grazing becomes less intensive and the pasture tends to be unimproved and, therefore, of greater importance ecologically.

Dark Peak Character Area 51 Part 1 - 1.14

Dark Peak Character Area 51

LANDSCAPE TYPE: SETTLED VALLEY PASTURES

Planting and Management Guidelines

A well-wooded pastoral landscape of small organic woodlands, occasionally of ancient origin, with densely scattered hedgerow and watercourse trees.

Excluding the Peak District National Park

Primary woodland character: Densely scattered small woodlands

Primary tree character: Densely scattered hedgerow and dense watercourse trees

Woodland vision: Widespread small-medium woodlands

Densely scattered hedgerow and dense watercourse trees Tree vision:

Typical woodland size range: 0.5 - 15ha small-medium

Woodland pattern: Organic

- · Small-medium scale woodland planting.
- · Where opportunities arise, the removal of coniferous plantation woodland should be encouraged.
- . Conserve and restore all ancient woodland sites and restock with locally occurring native species.
- · Promote linked extensions to ancient woodland by natural regeneration and planting.
- Ensure the use of indigenous tree and shrub species, including a proportion of large, long-lived species.
- Ensure the management and enhancement of hedgerow trees, through selection and natural
- . Encourage the management of scrub and secondary woodland to link with existing habitats and woodland.
- · Enhance the visual and ecological continuity of river corridors by management, natural regeneration and planting of riparian trees.
- · Ensure the conservation and management of mature/veteran trees within hedgerows.

Dark Peak

LANDSCAPE TYPE: SETTLED VALLEY PASTURES

		Woodland S	pecies Mix		
Neutral/ Base-Rich So	pils	More Acidic Soils		Waterlogged Condition	ns
Primary Tree Species	E00/.	Primary Tree Species 50%		on all soil types Primary Tree Species 50%	
Betula pendula	Silver Birch	Betula pendula		· Alnus alutinosa	Alder
Betula pubescens	Downy Birch	Betula pubescens	Downy Birch	Betula pubescens	Downy Birch
Quercus petraea	Sessile Oak	Quercus petraea	Sessile Oak	Salix caprea	Goat Willow
Quercus robur	Pedunculate Oak	Quercus robur	Pedunculate Oak	Salix fragilis	Crack Willow
Secondary Tree Spec	ies 20%	Secondary Tree Speci	ies 20%	Secondary Tree Speci	es 20%
Major		Major		Major	
raxinus excelsior	Ash	llex aquifolium	Holly	Betula pendula	Silver Birch
lex aquifolium	Holly	Sorbus aucuparia Populus tremula	Rowan Aspen	Ilex aquifolium	Holly
Minor		r opaido tromaia	, topon	Minor	
Malus sylvestris	Crab Apple			Quercus petraea	Sessile Oak
Prunus padus	Bird Cherry			Quercus robur	Pedunculate Oa
Sorbus aucuparia	Rowan			Tilia cordata	Small Leaved
				Lime	
Shrubs 10-30%		Shrubs 10-30%		Shrubs 10-30%	
Major		Major		Major	
Corylus avellana	Hazel	Corylus avellana	Hazel	Crataegus monogyna	
Crataegus monogyna	Hawthorn	Crataegus monogyna	Hawthorn	Salix aurita Salix cinerea	Eared Willow Grey Willow
Minor				Otalix Cirici Ca	City Willow
.onicera				Minor	
Periclymenum	Honeysuckle			Prunus spinosa	Blackthorn
				Rosa canina	Dog Rose
				Viburnum opulus	Guelder Rose
Open space 0-20%		Open space 0-20%		Open space 0-20%	
Watercourse Trees	tree species most a	appropriate for planting a	as watercourse trees.		
		Hedgerow S	pecies Mix		
Suitable hedgerow pla	ants			Suitable hedgerow tre	ees
Primary 70-75%				Primary 70-75%	
Crataegus monogyna	Hawthorn			Fraxinus excelsior	Ash
				Quercus petraea	Sessile Oak
Secondary 25-30%				Quercus robur	Pedunculate
Corylus avellana	Hazel				Oak
lex aquifolium	Holly			Casandam, OF 2007	
Prunus spinosa	Blackthorn			Secondary 25-30%	Field March
				Acer campestre Tilia cordata	Field Maple Small Leaved
				· cordata	Lime
				Tilia platyphyllos	Large Leaved
					Lime
				Occasional 0-5%*	
				Malus sylvestris	Crab Apple
				Prunus padus	Bird Cherry
				Sorbus aucuparia Ulmus glabra	Rowan Wych Elm
				* only to be used if occ	
				within the landscape of	

Dark Peak Character Area 51 Part 1 - 1.17

LANDSCAPE TYPE: RIVERSIDE MEADOWS

Gentle valley floors contain upland rivers, fined with dense trees. Hedgerows enclose small, sub-regular fields in a pastoral landscape, interrupted by the occasional historic mill.





Key Characteristics

- Gentle valley floors, with narrow flood plains containing meandering rivers
- Seasonally waterlogged soils over alluvium
- Low intensity permanent pasture
- . Localised patches of rushes in damp hollows
- Dense trees along watercourse, comprising of alder and willow
 Scattered boundary trees
- Scale, sub-regular fields enclosed by hedgerows and dry-stone
- Lanes along edges or crossing flood plains with gritstone bridges over the rivers
- Industrial heritage associated with gritstone mills powered by water
- · Strong sense of enclosure from adjacent slopes

Geology and Landform

The flat base of the valley is upon alluvium, formed when the river floods, slows down and deposits the sediments it carries. At the edge of the valley base, there are gentle slopes. They are undertain by Carboniferous shales and unconsolidated material deposited by weathering and downslope movement of material from the valley sides.

The underlying sediment on the flood plain consists of alluvial mud

lying over gravels. The gravel acts as an aquifer, carrying water from the adjoining land into the river and so is permanently waterlogged. The flood plain is generally flat in profile, with a gentle gradient downstream. There are hollows in the flood plain reflecting the past course of the river. Along the river margins, there are often noticeable banks celled levees. These form due to the deposition of sediment as flood waters wane and return to the river channel.

Soils and Land-Use

The soils are dayey loams, which are seasonally waterlogged.

Some areas are permanently waterlogged and some wet hollows retain flood water long after the majority of the floods have subsided. The traditional land-use is permanent grassland due to the heavy waterlogged nature of the soils and harsh climate.

Ecology

The wet meadows, found in hollows in the flood plain, remain partly flooded for much of the year. They support a marshy vegetation with rushes and are important remnants of a diminishing habitat type. Riparian trees add to the ecological value, particularly where there are patches of willow carr.

Further habitat diversity is provided by bands of scrub and secondary woodland that are colonising abandoned pasture.

Tree Cover

There are lines of scattered alder and willow along the banks of the

river including the occasional patch of willow carr.



Trees lining Filver Denwent
There are also occasional mature
trees along field boundaries. These
are principally oak and ash.

The tree cover is greatly intensified by the secondary woodland and scrub associated with abandoned and neglected pasture. Tree cover, together with the valley landform, creates a small scale enclosed landscape.

Enclosur

The valleys are fringed on either side of the main rivers by a band of one or two fields, with fairly straight boundaries. The fields are enclosed by thorn hedgerows and dry-stone walls.

Transport

The gentle valley bottoms contrast with the steep slopes of adjacent landscape types and form the obvious route for transport corridors. Lanes are not numerous but, where they occur, they tend to run along the edge of the flood plain, raised up on embankments to reduce the risk of flooding. Occasionally, roads cross the rivers over gristone bridges.

Built Environment

Historically, there would have been little built development on the flood plain. Farmsteads would have occupied the higher ground to the edge of the valley, where the risk of flooding was less. However, scattered throughout this landscape are water-powered gritstone mils and a few later steam-powered mils, often constructed of red brick with prominent chimneys.



Corn Mill at Rowsley

Summary

Fast flowing meandering rivers dissect Carboniferous sandstones and shales to form gentle valley floors with narrow flood plains. The soils are heavy clay loams prone to prolonged seasonal waterlogging.

These soils have traditionally supported meadowlands grazed by cattle. Fields tend to be medium sized enclosed by a mix of dry-stone walls and thorn hedgerows. Boundaries tend to be straight, although the edge of the flood plain is often sinuous.

Within the flood plain there are occasional mature hedgerow trees, predominantly oak and ash, with scattered trees, usually alder, along the river banks. The river corridor has a strong sense of enclosure created by the steep valley sides and extensive secondary woodland.

Due to the risk of flooding, this landscape would have been unsettled, with farmsteads being located on the valley sides. The valleys were transformed during the industrial revolution when industrialists built large mills to harness the power of the water. Some mills with associated weirs and pools remain today, converted to new uses.

Lanes are scarce and tend to cut across the flood plain but there are major roads and railway lines located at the edges, often on embankments.

LANDSCAPE TYPE: RIVERSIDE MEADOWS

Planting and Management Guidelines

An open flood plain with dense watercourse trees.

Excluding the Peak District National Park

Primary woodland character: Unwooded

Primary tree character: Dense watercourse trees

Woodland vision: Occasional small wet woodlands

Tree vision: Dense watercourse trees

Typical woodland size range: 0.5 - 5ha small

Organic/linear Woodland pattern:

- Ensure the use of indigenous tree and shrub species, including a proportion of large, long-lived species.
- · Ensure a balance is maintained between new woodland planting and areas of nature conservation value.
- . Enhance the visual and ecological continuity of river corridors by management, natural regeneration and planting of riparian trees.

Dark Peak

LANDSCAPE TYPE: RIVERSIDE MEADOWS

Woodland Species Mix

Waterlogged Conditions

Primary Tree Species 50%

† Alnus glutinosa Betula pubescens Alder Downy Birch

† Salix caprea † Salix fragilis Goat Willow

Secondary Tree Species 20%

Betula pendula

Silver Birch

Minor Quercus petraea

Sessile Oak Quercus robur Pedunculate Oak Tilia cordata Small Leaved Lime

Shrubs 10-30%

Major

Crataegus monogyna Hawthorn Salix aurita Eared Willow

Salix cinerea

Minor

Prunus spinosa Viburnum opulus

Blackthorn Rosa canina

Dog Rose

Open space 0-20%

† Watercourse Trees - tree species most appropriate for planting as watercourse trees.

Hedgerow Species Mix

Suitable hedgerow plants

Primary 70-75% Crataegus monogyna

Primary 70-75%

Quercus robur

Fraxinus excelsior Quercus petraea

Sessile Oak Pedunculate

Secondary 25-30% Secondary 25-30% Corylus avellana Hazel

Field Maple

Dark Peak Character Area 51 Part 1 - 1.20

Dark Peak Character Area 51 Part 1 - 1.21



Enclosed Moorland

Landscape Character

This is an open and elevated landscape, largely bare of trees, with expansive views over the settled valleys. Broad rolling hilltops, with thin, free draining soils overlying the gritatone form. This is marginal farmland and some fields are reverting to moorland with heather, gorse and bracken. The field pattern is regular and enclosed with dry gritatone walls. Settlement is confined to isolated farmsteads, sheltered by small groups of trees.

Key Landscape Characteristics to Consider

- · Moderate to steeply sloping gritatone hills
- . Thin peaty soils over gritatone
- · Rock outcrops on hill aummits and steeper slopes
- . Unwooded except for amenity trees around farmsteads
- Rough grazing and areas of damp pasture with patches of
- Areas of heather, gorse and bilberry where fields are reverting to moorland
- Medium to large regular fields bounded by dry-stone walls
- · Sparsely scattered gritatione farmateads
- Open landscape with expansive views

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Enclosed Moorland

Dark Peak

Development Principles

This is an open landscape with expansive views and very limited development. In such an unsettled landscape, any new development is likely to have a significant effect on the open character. For this reason new development is likely to be limited by policy OCT.

High Peak Borough Council Planning Policy OC4 requires new development to contribute to and not erode the landscape character and sense of place. The most appropriate way to achieve this is to ensure that buildings respond to the landscape character by following the design principles below. In areas within this landscape type where the landscape character has been eroded by previous activity any design approach should aim to improve and/or restore the landscape character.

These design principles are intended to help applicants and their advisers to think about how new development can be made to fit in with its auroundings. This does not mean trying to replicate the traditional style but to promote buildings that fit in with it in order to maintain the strong local character and identity of this part of the High Peak. This does not rule out appropriate contemporary design that demonstrates a response to the landscape.

Development and the Landscape



Properties should be nestled into the moorland side, below the summit



Trees groups should be plented around development for shelf

The impact of hardstanding and other surfaces should be considered, including the colour, brightness and reflectivity of the surface and how it would appear from a distance

Development should be contained in low, gritstone, drystone walls

Planting and Biodiversity Guidance

Where possible new development should include appropriate tree planting and creation of wildlife habitats. Derbyshire County Council has the influentiate printing pr

An open, unwooded landscape on broad, rolling hill summits punctuated by occasional small tree groups around farmsteads

 Conserve and enhance the tree groups that occur within and around rural settlements and isolated farmsteads

Habitat Creation and Enhancement

The following habitat types would be appropriate for creation and enhancement:

Primary Habitat Type:

- Rush pasture
- Lowland dry acid grassland
- Upland heaths

Secondary Habitat Type:

Rivers and streams (river corridors)

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Landscape Character Supplementary Planning Document

Enclosed Moorland

Small-scale Development

Building Form

Conversion of farm buildings should maintain a simple, functional form and not involve additional development

Plain elevations with doors and windows recessed into Properties should have a broad front elevation with narrow sides and a steep roof of 26 - 32° A simple and robust building form with minimal detailing

Building Detail



Give particular consideration to the design and proportions of windows, lintels and sills



Roofs should be flush to the walls of the house with plain roof verges and no fascia or barge boarding



Downpipes and guttering should be discreet, black and located close to the seves of the house



Windows should be set below the roofline and not break the continuity of the eaves. Dormer windows are not appropriate



Materials, colours and textures should reflect local traditional buildings



Chimneys should be low, substantial and located on

Enclosed Moorland

Dark Peak

Large-scale Development Building Form



Prefabricated metal bulldings do not weather well and remain obtrusive within the landscape. For this reason, materials that do weather well and are sympathetic to the landscape are preferred. Examples include vertical slatted boarding, concrete to blend with swisting bulldings or reclaimed stone. New buildings should be kept as small as is practically possible and reflect the scale, proportions and form of existing traditional farm-outbuilding

Buildings should be durable; easy and economic to repair

Building Detail



Darker roofing than walling gives weight and reduces visual impact and reflection on larger buildings

New buildings should be

no lighter or brighter than existing buildings



Some stone detailing, will help to assimilate new development into the existing landscape setting



Downpipes and guttering should be black, discreet and located close to the eeves of the building



Colours should reflect those of existing, traditional gritatone buildings, warm brown tones or deep green to reflect colours in the wider landscape

Please Note: Use the landscape rather than this document as a colour guide as digital colours may vary.

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Landscape Character Supplementary Plenning Document



Sattled Valley Pastures

Landscape Character

The underlying geology is gritstone and shale. There are scattered farmsteads outside the compact settlements. This is a pastoral landscape with permanent improved pasture which gives way higher up the slopes to poorer grazing where the ecological value is greater. The landscape has a strong network of winding lanes and roads and railways along the lower slopes above the floodplain. This is a well wooded landscape with wooded cloughs around tributary valleys and hedgerows with some hedgerow trees which define irregular fields. Amenity tree groups are associated with settlements and there is woodland along the roads and railway lines. As with the field boundaries, the woodland often has irregular outlines.

Key Landscape Characteristics to Consider

- Moderate to steep lower valley slopes dissected by stream valleys
- · Poorty draining soils over carboniferous shale and sandstone
- Wooded character associated with tree belts along streams and cloughs, scattered hedgerow trees and tree groups around settlement and farmsteads
- Localised bracken in some road verges and rushes associated with damp hollows
- Small, irregular fields enclosed by mixed species hedgerows and occasional dry stone walls
- Settled landscape of small nucleated settlements and scattered stone farmeteads with stone slate roofs
- . Stone terraces on lower slopes associated with historic miles

- Network of winding lanes with irregular verges, sometimes sunken on steeper slopes
- Pastoral farming with extensive improved pasture
 Fordread landscape with views filtered by tress
- Roofs are generally dark slate or stone tiles
- Hools are generally dark state or stone tree

Settled Valley Pastures

Dark Peak

Development Principles

High Peak Borough Council Planning Policy OC4 requires that new development must contribute to and not erode the landscape character and sense of place. The most appropriate way to achieve this is to ensure that buildings respond to the landscape character by following the design principles below, in areas within this landscape type where the landscape character has been eroded by previous activity any design approach should aim to improve and/or restore the landscape character.

These design principles are intended to help applicants and their advisers to think about how new development can be made to fit in with its surroundings. This does not mean trying to replicate the traditional style but to promote buildings that fit in with it in order to maintain the strong local character and identity of this part of the High Peak. This does not rule out appropriate contemporary design that demonstrates a response to the landscape.

Development and the Landscape



Properties are either isolated farmsteads or cottages clustered along the road

Small groups of amenity trees around settlements and particularly farmateeds

The impact of hardstanding and other surfaces should be considered, including the colour, brightness and reflectivity of the surface and how it would appear from a distance

Development should be contained in low, gritstone, drystone walls

The rural landscape character must be considered when developing at the urban rural edge

Planting and Biodiversity Guidance

Where possible new development should include appropriate tree planting and creation of wildlife habitats. Derbyshire County Council has identified priorities for this Landscape Character Type, which are summarised below. For full details, including tree species mixes, please refer to "The Landscape Character of Derbyshire County County Council, 2004.

A well wooded pastoral landscape of small organic woodlands, occasionally of ancient origin, with densely scattered hedgerow and watercourse trees.

. Small-medium scale woodland planting

High Peak Borough Council

- Where opportunities arise the removal of coniferous plantation woodland should be encouraged.
- Conserve and restore all ancient woodland sites and restock with locally occurring native species.
- Promote linked extensions to ancient woodland by natural regeneration and planting.
 Ensure the use of indigenous tree and shrub species, including
- a proportion of large, long lived species.
 Ensure the management and enhancement of hedgerow trees.
- through selection and natural regeneration, or by planting.
 Encourage the management of scrub and secondary woodland.
- to link with existing habitats and woodland.

 Enhance the visual and ecological continuity of river corridors by management, natural regeneration and planting of riperian trees.
- Ensure the conservation and management of mature/veteran trees within hedgerows.

Habitat Creation and Enhancement

The following habitat types would be appropriate for creation and enhancement:

Landscape Character Supplementary Planning Document

Primary Habitat Type:

- Ancient and semi natural broad leaved woodland
- Wet woodland
- Veteran trees
 Ancient and species rich hedgerows
- Rush pasture
- Reedbeds
- Neutral grassland
- Standing open waters and canals
- Rivers and streams (river conidors)

Secondary Habitat Type: • Lowland fen meadows

. Lowland dry acid grassland

Lowland dry acid grassiand

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Settled Valley Pastures

Small-scale Development

Building Form



Plain elevations with doors and windows recessed into

Conversion of farm buildings should maintain a simple, functional form and not involve additional

Properties should have a broad front elevation with narrow sides and a steep roof of 26-32°, following the distinctive traditional form

A simple and robust building form with minimal detailing

Building Detail



consideration to the design and proportions of windows, intels and sills



Roofs should be flush to the walls with plain verges and no fascia or barge boarding



Downpipes and guttering and located close to the seves of the house



Windows should be set below the rooffine and not break the continuity of the eaves. Dormer windows are not appropriate



Materials, colours and textures should reflect local traditional buildings



Chimneys should be low

Settled Valley Pastures

Dark Peak

Large-scale Development **Building Form**



Prefabricated metal buildings do not weather well and remain obtrusive within the landscape. For this reason, materials that do weather well and are sympathetic to the landscape will be preferred. Examples include vertical slatted boarding and painted concrete to blend with existing buildings, reclaimed stone

New buildings should be kept as small as is practically possible and reflect the scale, proportions and form of existing. traditional farm-outb uilding

Buildings should be durable; easy and economic to repair

Building Detail



Darker roofing than walling gives weight and reduces visual impact and reflection

New buildings should be no lighter or brighter than existing buildings



Some stone detailing helps to assimilate new development into the



Downpipes and guttering should be discreet, black and located close to the seves of the building



Colours should reflect those of existing, traditional gritatone buildings; warm brown tones, or deep green colours to reflect colours in the wider landscape

Please Note: Use the landscape rather than this document as a colour guide as digital colours may vary.

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Landscape Character Supplementary Planning Document

Appendix 3 - Extract from High Peak Borough Council Landscape Character SPD (March 2006)



Landscape Character

Meandering rivers dissect carboniferous sandstones and shales to create gentle valley floors with narrow flood plains with heavy clay soils that are prone to seasonal waterlogging. The traditional land use has been meadowland cattle grazing in medium sized fields that are enclosed with either thom hedges with occasional hedgerow trees, mainly ash and oak, or dry-stone walls; these are often straight. The river corridors are enclosed due to the steep valley sides and extensive woodland. As this landscape is at risk from flooding it is largely unsettled with farmsteads located on the valley sides, there are some old mills located adjacent to the river in order to harness the water power. There are few lanes across the corridors but along the edges there are some major roads and railway lines which are often constructed on embantements.

Key Landscape Characteristics to Consider

- Gentle valley floors with narrow flood plains containing meandering rivers
- Seasonally waterlogged soils
- Dense trees along watercourses, comprising of alder and willow
- Scattered boundary trees
- Small, sub-regular fields enclosed by hedgerows and dry-stone walls
- Low intensity permanent pasture with localised patches of rushes in damp hollows
- Industrial heritage associated with gritstone mills powered by water
- An uninhabited landscape with isolated, usually large properties
- Characteristic buildings are constructed from gritstone, with lintels and sills around windows and often associated with outbuildings and barns
- . Floofs of dark state or stone tile
- A simple built form with square of rectangular shaped properties with little or, more usually, no ornamentation

- Lanes along edges or crossing flood plains with gritstone bridges over the rivers
- Strong sense of enclosure from adjacent slopes

Recent Landscape Impacts

Some industrial/ commercial developmente exist but these are not characteristic of the landscape and tend to degrade the landscape character, being very obtrusive. One element which tends to be most obtrusive is outdoor storage or parking areas which innoset considerable in such an open landscape.

Riverside Meadows

Dark Peak

Development Principles

Within this landscape, development will generally be inappropriate as the visual impact will be substantial and will have a significant effect on the character of the landscape. The potential flood risk in this landscape is the key limiting factor

High Peak Borough Council Planning Policy OC4 states that new development must contribute to and not erode the landscape character and sense of place. The most appropriate way to achieve this is to ensure that buildings respond to the landscape character by following the design principles below. In areas within this landscape type where the landscape character has been eroded by previous activity any design approach should aim to improve and/or restors the landscape character.

These design principles are intended to help applicants and their advisers to think about how new development can be made to fit in with its aumoundings. This does not mean trying to replicate the traditional style but to promote buildings that fit in with it in order to maintain the strong local character and identity of this part of the High Peak. This does not rule out appropriate contemporary design that demonstrates a response to the landscape.

Development and the Landscape



Stands of deciduous trees would be expected close to properties. Any planting must consider the impact on water flow.

Buildings should be set above the level of the floodplain

Development should be contained by thom hedgerows with scattered hedgerow trees or grit stone dry stone walls

lealated farm buildings would not occur within this landscape type, instead farm properties exist as complexes

The impact of hardstanding and other surfaces should be considered, including the colour, brightness, reflectivity of the surface and how it would appear in the landscape from a distance.

Planting and Biodiversity Guidance

Where possible new development should include appropriate tree planting and creation of wildlife habitate. Derbyshire County Council has identified priorities for this Landscape Character Type, which are summarised below. For full details, including tree species mixes, please refer to The Landscape Character of Derbyshire (Durly Council, 2003).

An open floodplain with dense watercourse trees

- Ensure the use of indigenous tree and shrub species, including a proportion of large, long-lived species.
- Ensure a balance is maintained between new woodland planting and areas of nature conservation value.
- Enhance the visual and ecological continuity of river corridors by management, natural regeneration and planting of riparian trees.

Habitat Creation and Enhancement

The following habitat types would be appropriate for creation and enhancement:

Primary Habitat Type:

- Wet woodland
- Floodplain grazing mareh
- Rush pasture
- · Reed beds
- Lowland fen meadows
- · Neutral grassland
- Standing open waters and canals
- Rivers and streams (river confidors)

Landscape Character Supplementary Planning Document

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Riverside Meadows

Small-scale Development

Building Form

Properties should have either a broad front elevation with narrow sides or a square plan form and should have a steeply pitched roof 26-32° Conversions of farm buildings to non-agricultural use should not involve additional development, the aim being to maintein the simple, functional form

Plain elevations with no porches, doors and windows recessed into walls A simple and robust building form with minimal detailing

Building Detail



Drains and guttering should be black, discreet and located close to the eaves of the house



Plain verges to the roof with no fascia or barge boarding and flush to the walls of the bouse



Chimneys should be substantial and tall on gable ends



Particular care must be taken over the design and proportions of windows,



Materials, colours and textures to reflect local, traditional buildings and the colours of the wider landscape Windows should be set below the roofline and not break the continuity of the eaves, domer windows are not appropriate in most cases

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Building Form

Prefabricated metal buildings do not weather well and remain obtusive within the landscape. For this reason, materials that do weather well and are sympathetic to the landscape will be required. Examples include vertical statted boarding and concrete to blend with eviding buildings.

Riverside Meadows

Large-scale Development

New buildings should be kept as small as is practically possible and reflect the scale, proportions and form of existing traditional ferm-outbuildings

Buildings should be durable as well as easy and economic to repair

Reclaimed stone is a good material for the construction of outbuildings

Building Detail



Guttering should be discreed and close to the eaves of the building so as to reflect the traditional form



Roofing should be darker than welling to give weight, reduce visual impact and reflection



New buildings should be no lighter then existing buildings. New buildings should be no lighter or brighter than existing buildings



Dark Peak

Colours should reflect those of existing, traditional grittone buildings; warm brown tones, or deep green colours to reflect colours in the wider landscape

Some stone detailing, such as wells or quoins will help to assimilate new development into the existing landscape setting

Please Note: Use the landscape rather than this document as a colour guide as digital colours may vary.

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Landscape Character Supplementary Planning Document

4: Dark Peak Western Fringe

Peak District National Park Authority

Peak District National Park Authority

#: Dark Feak Western Fringe

Enclosed Gritstone Uplands

An enclosed upland landscape associated with high, gently undulating upland tops. This is a landscape of isolated stone farmsteads, straight roads and regular fields enclosed by drystone walls. Patches of remnant moorland vegetation are a feature in places within this landscape character type.



Knares Nook or Hollingworth Head @ Peak District National Park Authority

Key characteristics

- High rolling upland with some steeper slopes
- . Thin soils over gritstone bedrock with localised pockets of peat
- Remnant patches of rough land with bracken and gorse, some heather and bilberry
- Permanent pasture and rough grazing endosed by gritstone walls
- Regular pattern of medium to large fields
- Straight roads with wide verges of grass and, in some places, heather
- Scattered gritstone farmsteads with stone slate roofs and some relict quarry and coal mining sites
- Trees grouped around farmsteads for shelter



This landscape occurs on the edge of the moorland core, on the western margin of the Peak District, on the uplands centred on New Mills and to the west of Hayfield.

Geology and landform

This landscape is associated with a high, gently undulating gritatione upland top. The underlying bedrocks Milistone Crit, which is often exposed as rock outcrops particularly on the steeper slopes where it sometimes forms small gritatione edges.

Soils and vegetation

The variable nature of the geology and landform gives rise to a variety of soil types ranging from free draining podacis on steeper slopes to wetter, more peaty soils or gentler summits. All the soils are characterised by their improverished, addic origin and although most of the land is now improved for pasture, many patches of semi-natural vegetation still exist along verges, on steeper slopes and even as isolated patches within some fields. There is moorhand vegetation in some locations, in places on Martley Moor. Health-associated species, such as healther, bilberry and gorse, are a common feature in places. Where the soils are wetter, species such as purple moor grass tend to be more common. There are some patches of soft rush on the wetter soils, which often support small populations of breeding birds such as single.

Tree cover

The sheep grazing, poor soils and exposure restrict tree growth so this is essentially a treeless landscape. However, there are occasional tree groups of mainly broadleaved species such as cask, ash and sycamore. Tree groups are planted adjacent to some farmsteads to create shelter around properties. There are some shelterbelts and occasional blocks of 19th or 20th century coniferous plantation woodland within this type.

Land use

This is a landscape of mostly improved permanent pasture with sheep and cattle grazing and some rough grazing. There are some reseeded grass leys and very occasional stable fields. However, the soils are mostly nutrient poor. Acid grassland exists where the soils have not been improved and some fields are dominated by rushes or are reverting to moordand habitate providing exclosing interest.

Historically, there was quarrying and mining associated with this landscape. At Chinley Churn there are particularly extensive relict quarries where surface quarrying and underground stone extraction was carried out. Historically, the landscape would also have supported coal mining as around Whaley Moor, Aspenshaw and Ludworth Intakes. There are extensive mining remains at Ollersets Moor dating from the early 16th to late 19th century.

Enclosure

The late of the enclosed from upland waste and commons: The date of the enclosure in this landscape varies with some sucient, irregular enclosure that predates mid 17th century historical mapping, as for example to the north-west of Hayfield. Later enclosure is more common. Some was probably enclosed prior to the late 18th century as part of private agreements, other areas could well have been enclosed as 1st has the 19th century.

Drystone gristone walls are the prominent enclosing element, particularly on higher ground, although in some places enclosure is created by hedgerows and fencing this tends to brout towards the fringes of the landscape and not on the higher ground.

Settlement and buildings

Settlement tends to consist of isolated gritstone farmsteads with stone slate roofs often dating from the time that much of this landscape was enclosed from the libth century onwards. Settlement often use the natural land form for weather protection. Figher up, towards where the enclosure gives way to the open moorland, the landscape is largely uncettled.

Transport and access

This is a landscape with limited vehicular access with a few roads and tracks associated with farmsteads. Within this landscape type there are older roads and names such as Monks Road suggest historical context associated with landscapers such as those at medieval abbeys. There is a network of footpaths throughout this landscape including the Pennine Brideway and some small areas of access land.

4: Dark Peak Western Fringe

Peak District National Park Authority

Peak District National Park Authority

4: Darfi Peak Wastern Fringe

Valley Pastures With Industry

A small scale, settled pastoral landscape on undulating lower valley slopes. There are filtered views through scattered hedgerows and dense streamside trees. Stone built terraced housing on lower slopes is associated with historic mills. There are dispersed gritten armsteads as well as small dusters of farms with associated dwellings. Pastoral farmland is bounded by hedgerows and drystone walls.



Pastoral valleys with industry © Ivan Gajos, Countryscape

Key characteristics

- A low lying undulating valley topography, rising towards adjacent higher ground
- Network of streams and localised damp hollows with millponds and leats
- Pastoral farmland enclosed by hedgerows and drystone walls
- Small to medium sized fields
- Trees are dense along watercourses and scattered along hedgerows and around settlement
- Dispersed settlement with isolated farmsteads and small clusters of dwellings
- Stone built terraced housing associated with historic mills
- Narrow winding lanes, sunken on slopes



This landscape character type exists as a large area running from the north to the south of the Dark Peak Western Fringe running from Bleak Hey to Stalybridge and from Arnfield to Chapel-en-le-Frith.

Geology and landform

An undulating lower valley floor landscape with rounded hills and shallow to steep valley sides, incised by steeper cloughs in places. The underlying geology is of interbedded Millatone Grit combined with shales and silutiones. To the south of the area, below Glossop and west work, the coal measures influence the underlying geology. The coal measures consist of interbedded gray shales, silutiones and sandationes with occasional beds of coal and ironatione (the latter dispersed through particular heds of other rocks). The valley is mostly covered with glocal still deposits. Where the river level has aftered, a series of fearnoss have been out into allowid deposits.

Soils and vegetation

Soils are characterised by base poor, gleyed soils which are waterloged, lacking coygen and nutrients. Where the soils are permanently wet the honzons then do be nich in organic matter and often intergrading into peat deposits. Along river channels soils tend to be allowinum, orested and carried by pelicit rivers. This is an agricultural landscape with limited biodiversity value as much of the land is improved, although there are occasional, looked patches of unimproved grassland which enhances biodiversity. Mixed species bedgerows provide an important habitat linking woodland and other habitats. In wester fields there are runby pastures which provide diversity as do the heath species such as heather and biberry that are often located along verges.

Tree cover

Woodland exists as shelterbelts and often densely along streams and tributaries giving the impression of a well woodled landscape even though much farmland exists. There are reattered ancient woodlands throughout the character type such as around the wester side of Shire Hill; these further contribute to the woodled nature of the landscape. Most woodlands are broadlewed and contain species such as oak, ash and sycamore. There is some coniferous plantation woodland such as around Dovestones.

Land use

This is a partonal landscape of cattle and sheep grazing. In some areas, agnoulture is more intensive with dairying and stock rearing. There are reservoirs in this landscape, such as the Coombee Reservoir, the Bottoms Reservoir and the Dovestone Reservoir. There are also some industrial mills surviving in the valley bottoms, as for example around Birsh Vale, Chinley and Uppermill.

Areas such as Whaley Bridge and New Mills were also historically important for coal mining and the coal extracted was very important in the 19th and early 20th centuries to provide full for local manufacturing and industry. While not much remains at surface of these once important mines, there are rare examples of Cornish steam engine houses and other colling structures attill standing.

Enclosure

This is a landscape of small to medium fields, many of which are known to pre-date the first historical mapping of the mid 17th century. Other enclosures are also irregular but undated, while there are examples of regular enclosure such as to early 19th century Parlamentary Enclosure fields to the south-east of Glosop. Within this landscape character type there are several small areas of narrow fields that reflect piecemed enclosure of strips on medieval poper fields associated with the settlements, so the east of Hadfield, around Padfield, and to the south of Glosop at Charlesworth, Writfield and Chunal.

Settlement and buildings

This is a settled landscape with distinctive gristione mill settlements and dispersed outlying settlement. Beyond the urban centres; such as Glossoy, New Mills and Whaley Bridge, there are those distinctive forms of settlement in the landscape: dispersed farmsteads, farmsteads clustered with other dwellings in hamlets, and terraces: associated with historic mills.

Transport and access

This landscape has a relatively strong network with some busy roads and many smaller winding lanes that connect areas of settlement. There are two train lines running through this landscape. There were once further railway branches in this landscape character type that have now closed, some now forming recreational routes such as the Sett Valley Trail. 4: Dark Peak Western Fringe

Peak District National Park Authority

Riverside Meadows

A small scale pastoral landscape characterised by a meandering river channel in a flat alluvial floodplain. Views are often tightly framed by lines of riverside trees. Patches of wetland vegetation are a distinctive feature associated with the river channel.



River Goyt Furness Valle @ Peak District National Park Authority

Key characteristics

- A flat alluvial river corridor
- Meandering river channel with shingle beds and marginal vegetation
- Seasonally waterlogged alluvial soils
- Grazing meadows, often with patches of wet grassland
- Dense waterside and scattered hedgerow trees



This landscape character type exists in two locations within this firinge landscape along the River Etherow and further south along the River Goyt.

Peak District National Park Authority

4: Dark Peak Western Fringe

Geology and landform

This is a river valley bottom landscape and has a narrow almost flat floodplain. There are deposits of alluvial sits sands and gravels. Hollows within the floodplain reflect the past courses of the river.

Soils and vegetation

The floodplain is characterised by gleyed soils that are either continuously or seasonally waterlogged. The river enhances the fertility of the soil when flood water deposits nutrients that replenish the west soils. The meadows are either seasonally or permanently wet, creating wet pastures which support soft rush and some sedges.

Tree cover

The river banks are densely lined with alder and some willow. This creates an intimate landscape where views are filtered by watercourse trees and framed by the adjacent wooded slopes. In places there are small copies of willow carr and poplars.

Land use

This is a partoral landscape with permanent pasture dominating due to heavy soils and assessional wateringging. There is some semi-improved grassland. In the past, land uses have been more industrial, the fast flowing rivers were used to power industry. Away from the urban areas on the narrow floodplain some milks still survive and are often converted to other uses, while other milks have been demicilated and only remnant mil pends and races give evidence of this past industry in the tranqual landscape.

Enclosure

Endourse in this landscape is often irregular, particularly along the River Coyt where it a origin is unknown. Generally, small fields are bound by most species thorn dominated hedgerows creating a sense of endourse adjacent to the river; the presence of riverside trees enhances this sense of endourse.

Settlement and buildings

This is a largely unsettled landscape where the wet ground and risk of flooding make development difficult. There are occasional gristione farmsteads on the higher ground above the valley bottoms and several sites of former milk.

Transport and access
There are few roads within the character type

There are few roads within the character type due to the wet nature of the soils creating limited opportunity for road building, in places roads and the railway line out through the landscape to cross over the river. Crossing points vary with some gristone bridges and, later, metal bridges. The Peak Forest Canal Follows the Roadplain in places. The Bugswoth Canal Basin was an important transport hub created in the late 18th century that today forms an important leaver resource.



Areas of Multiple Environmental Sensitivity 2013



A Methodology to Identify Areas of Multiple Environmental Sensitivity (AMES); (landscape, ecology and the historic environment)

1.0 Background and Introduction

In order to respond to a range of requests from various bodies and organisations, Derbyshire County Council's Conservation and Design Section has developed a methodology for reviewing known environmental data within a landscape spatial framework. This work has helped to inform the targeting of Environmental Stewardship Higher Level Scheme (HLS) funding, the identification of key strategic Green Infrastructure assets, and the potential for housing growth across the county but particularly within the Derby and Nottingham Housing Market Areas (HMA).

This approach was developed because of a need to improve the ability to manage and deliver the most appropriate environmental objectives in those geographic areas where environmental outcomes across all disciplines (landscape, ecology and the historic environment) are likely to be greatest as part of a sustainable approach. It is also important in helping to underpin specific policies in the National Planning Policy Framework such as paragraphs:

110. In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework.

113. Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged.

The overall aims of this project were:

- To adopt an holistic approach to identify those areas of landscape of 'multiple environmental sensitivity' relating to ecology, the historic environment, and visual unity.
- To develop a methodology that uses landscape characterisation as a spatial framework for the analysis of other environmental data allowing the outputs to nest within National and Regional Landscape Character initiatives.
- To establish an assessment framework that allows for the assessment of data across the whole of Derbyshire, excluding the Peak District National Park, in accordance with the principles of the European Landscape Convention.
- To utilise a Geographic Information System (GIS) as a tool for analysing and collating known environmental datasets and mapping the outputs.

The assessment undertaken by the Conservation and Design (C&D) Section as a response to these aims included:

- Utilising data collected as part of the Derbyshire Landscape Character Assessment.
- The analysis of data produced as part of the Derbyshire Historic Landscape Character Assessment and held in the Historic Environment Record (HER).
- The analysis and collation of various data sets relating to known habitat and species information.

Note: The assessment relates to all known relevant data held by the Conservation and Design Section as of August 2010.

¹ National Landscape Character Areas as defined by Natural England (formerly Countryside Commission/Countryside Agency) and the East Midlands Regional Landscape Framework (2010), Natural England (East Midlands Region)

2.0 Methodology

In order to define sensitive areas of landscape it was necessary to identify a spatial framework within which to assess and analyse the environmental data held and managed by the C&D Section. It was also important that the spatial unit was robust, meaningful and operated at an appropriate scale to deliver strategic guidance and yet respond to the underlying character of each Landscape Character Type and National Character Area (NCA).

It was decided that the most appropriate spatial unit for undertaking this exercise was the Landscape Description Unit (LDU); the fundamental building block of the Derbyshire Landscape Character Assessment. A detailed methodology for the definition of a LDU can be obtained from "The Living Landscapes Project Landscape Characterisation Handbook: Level 2 (Version 4.1)", Warnock S, 2002.

However, in general terms, LDUs are distinct and relatively homogenous units of land defined by a number of attributes relating to:

- · Physiography the relationship between geology and landform
- Ground Type the relationship between geology and soils
- Landcover a reflection of surface vegetation; both land use and tree cover
- Cultural pattern an assessment of settlement pattern and farm type

Not only do LDUs provide a meaningful and structured spatial framework for the analysis of other environmental data, they also allow for full county coverage outside of the Peak District National Park. Furthermore, all LDUs are digitally mapped and form part of a GIS allowing for various datasets to be compared through a process of overlay and guery mapping.

In general terms, those landscapes of highest sensitivity to change will be areas where the landscape remains intact both visually and structurally, have strong historic and cultural identity, and contain many widespread semi-natural habitats with associated linkages appropriate to the character of the area.

Sections 2.1, 2.2 and 2.3 that follow, describe how each of these indicators was assessed. Sections 2.4 and 2.5 conclude the methodology, describing how the historic, ecological and visual indicators were brought together to produce a map of areas of multiple environmental sensitivity.

2.1 Ecological data

The County Ecologist is in receipt of various datasets relating to the biodiversity of the county, many of which are now held electronically in a GIS. The main objective of this work was to identify those areas of greatest ecological sensitivity, by identifying and taking account of a range of habitats that contribute to biodiversity.

As a result, for Derbyshire, the following spatial datasets were amalgamated to create one overlay of ecological data. This involved bringing together data relating to:

- Ancient woodlands (including woods under 2ha) and wet woodlands
- · Historic wood pasture and parkland
- Standing open water
- Upland and lowland heath
- Swamp, Fen, Mire and Reedbed (some point data excluded)
- Blanket bog
- · Semi-natural grassland (including calcareous and dry acid grassland)
- Traditional orchards
- Designated sites eg. SSSIs
- Locally designated wildlife sites

The amalgamation of the above datasets created a single 'ecological resource' layer, identifying all areas which support habitats of notable ecological value, whether formally designated or not.

Note: Where datasets, such as ponds and reedbeds, overlapped with each other, or where habitat types were identified within designated sites, then the combined dataset was designed so that the same area was only counted once.

This combined data was then analysed within the spatial framework of the LDU. This was achieved by calculating the total area coverage of ecological interest within each LDU and expressing this as a percentage.

Note: 5.72% was the median 'average' for the dataset - see below

2.2 Historic Environment Data

The primary source of historic data used in this work is the Historic Landscape Character Assessment (HLCA) managed by the County Archaeologist. HLCA basically divides the landscape into a series of pre-defined categories based on historic map evidence. For the purpose of this exercise it was decided that those landscapes associated with ancient enclosure, characterised by fossilised strip fields or irregular field patterns were the most important with respect to the historic landscape and the most sensitive to change. These landscapes have longer time depths, are often irreplaceable and present many features associated with ancient enclosure such as ancient woodlands, mixed species hedgerows and ridge and furrow.

In addition to areas of ancient landscape, the view was taken that historic parkland is another heritage asset worthy of inclusion in this assessment. Parkland is particularly valued by people and again presents many features of the historic environment such as ancient trees and boundary features, which are difficult to replace and need to be considered in strategic planning matters.

Finally, data relating to Scheduled Monuments was extracted from the HER to take account of specific designated heritage assets; important features in the landscape and appropriate for protection.

As with the ecological data, this information was combined to create a single overlay of historic environment data, again ensuring that duplicate areas were counted only once. This information was analysed within the spatial framework of the LDUs with total coverage expressed as a percentage.

Note: 34.73% was the median 'average' for the dataset - see below

2.3 Landscape Character data

Data relating to the current character of the landscape has the advantage of having been captured by LDU as part of a full and comprehensive field survey. Although this produced many datasets relating to the condition of the current landscape, it was decided that visual unity was most appropriate for measuring the overall visual 'intactness' of the landscape, particularly allied to the ecological and cultural datasets.

Using GIS, the visual unity data was thematically mapped by the following categories:

- Unified
- Coherent
- Interrupted
- Incoherent

Note: LDUs classified as 'urban' have no data relating to visual unity

65

2.4 Derivation of Areas of Multiple Environmental Sensitivity

Areas of Multiple Environmental Sensitivity were selected as the areas where two or more of the input indicators (historic, ecological or visual unity) were determined as significant. The indicator was classed as significant in the following ways:

Ecological and Historic Environment

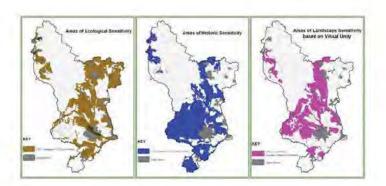
It was decided that for each dataset, significant % coverage is that which is above the 'average' % coverage, i.e. areas which were above 'average' were considered to hold significant ecological interest. It was noted that the ecological data was particularly 'skewed' with a significant number of LDU being found to hold no or very little identified ecological interest, with a smaller number of LDUs having a high percentage cover. Consequently, the 'mean' average was found to be particularly low, and it was therefore considered inappropriate to use the mean average in this assessment, as a large number of LDUs with a small percentage of coverage of ecological interest would have been identified as being significant. The median average was therefore used in the consideration of ecological data, such that the LDUs which were identified as significant were those which were in the top half of the ranked LDUs. The median was applied to the historic indicator for consistency, though the spread of percentages was more evenly distributed across its range, so the mean and median produced a similar result.

The cut-off points were therefore:

- Ecological % coverage >= 5.72%
- Historic Environment % coverage >= 34.73%

Visual Unity

Of the four Visual Unity categories, the two most important categories (again, the top half) were taken as significant. These are those LDUs classified as "Unified" or "Coherent".



2,5 Defining Areas of Multiple Environmental Sensitivity

Having selected the individual sensitivities, as outlined above, these were then brought together into 'Areas of Multiple Environmental Sensitivity', further subdivided into 'primary' and 'secondary' significance based on the following criteria:

- Primary Sensitivity where an LDU was recorded as significant for all three of the individual datasets
- Secondary Sensitivity where an LDU was recorded as significant in two of the individual datasets

Both of these scenarios are considered to be important with respect to their relative sensitivities and their consideration in strategic planning, and in upholding the principles of the European Landscape Convention. Those areas of 'Primary Sensitivity' are considered to be the most sensitive areas of landscape, which are most likely to be negatively affected by change or development and will attract a strong focus on the Protection (Conservation) of their environmental assets. Those areas of 'Secondary Sensitivity' are still considered to have environmental sensitivities but are potentially weaker in one area. These areas will attract a strong focus on the Management (Conservation and Enhancement) of these areas; that is maintaining those features of existing value but also addressing those in decline, i.e. focus on landscape restoration, habitat creation, etc. Areas of landscape that are not identified as being strategically sensitive through this assessment process will be the areas that might be less sensitive to change, or conversely those which would benefit from a strong forward looking Planning (Restoration/creation) strategy.

3.0 Findings

The resultant areas identified by the methodology concur with the professional opinion of the various specialists in the C&D Section. Excluding the Peak District National Park, 47% of the county was classified as being of 'Primary' or 'Secondary' sensitivity with respect to the environmental data analysed in the assessment. Areas of 'Primary Sensitivity' alone constitute 16% of the same area.

The most sensitive areas, those classified as primary significance, are mainly associated with the Peak Fringe and Lower Derwent NCA. These occur as an almost continuous band from the Moss Valley in the north, through the Ashover Valley to Crich and Alderwasley in the south. There are additional areas within this NCA immediately east of Carsington Water around Kirk Ireton.

Other areas of environmental sensitivity also occur within the Needwood and South Derbyshire Claylands NCA. These areas are associated with the parklands of Kedleston Hall, Meynell Langley, Ednaston and Osmaston. Further areas of interest in this NCA are located on rising ground to the east of the Dove Valley around Marston Montgomery.

Although the remainder of the county has few areas of primary significance, there is a small area around Repton and Bretby Park in the Melbourne Parklands NCA and around Calke Abbey and Ticknall. Other sensitive areas can be seen in the Dark Peak (includes the South West Peak) NCA to the south and west of Chapel-en-le-Frith around the minor settlement of Tunstead Milton, and to the east and west of Whaley Bridge.

4.0 Summary and Conclusions

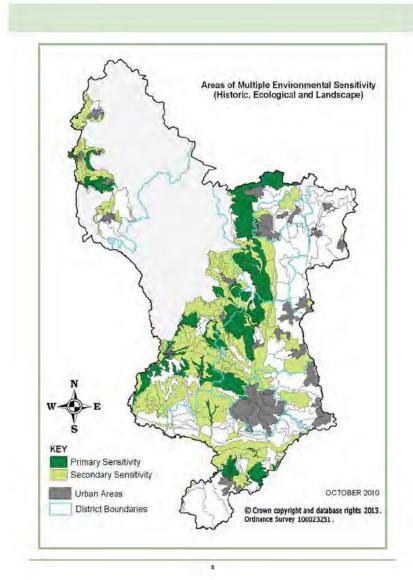
Overall, the methodology outlined above has allowed for different datasets to be analysed within a spatial framework to identify those areas of landscape that are considered to be most sensitive with respect to landscape character, biodiversity and the historic environment. At the same time this spatial framework nests within the Landscape Character Types identified in the Derbyshire Landscape Character Assessment and, in turn, these sit within the Regional Landscape Character Types and the NCAs.

Those areas of multiple environmental sensitivity, expressed as primary and secondary sensitivity in the report, can then be used for a number of strategic purposes including the targeting of environmental grants and the allocation of large scale development. The strength of this approach is that the NCA can remain as the overarching delivery unit but there are clear links to the more detailed Derbyshire Landscape Character Assessment.

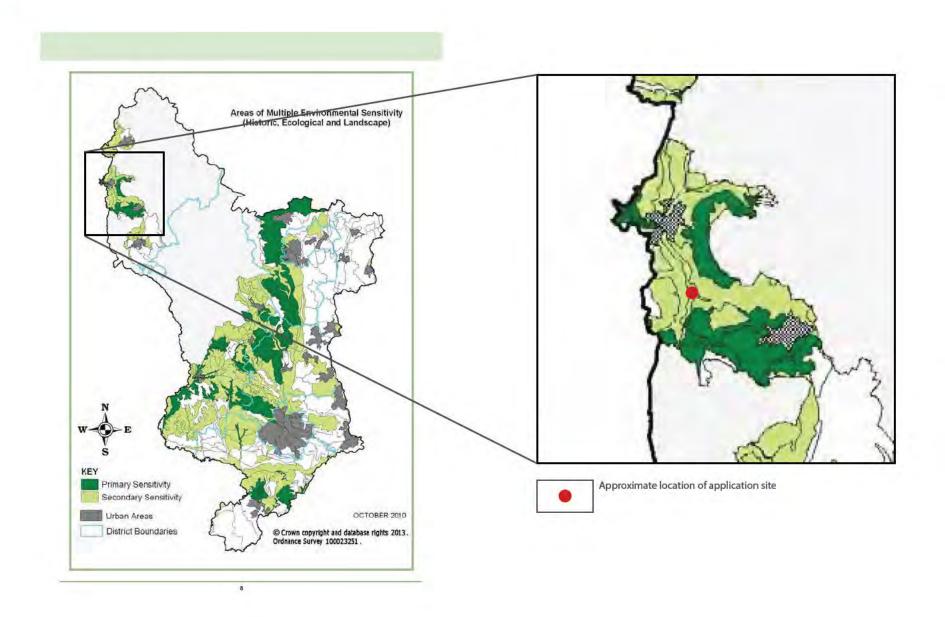
It is also important to acknowledge that the methodology has some limitations:

a) the outputs may be slightly skewed by a lack of data; this is particularly true of the Needwood and South Derbyshire Claylands. Although this NCA has been identified as having some areas of multiple environmental sensitivities, the true value of this NCA may be underestimated as a consequence of the limited ecological data available for this area. This is primarily due to the general lack of development pressures in this landscape, leading to site assessments, and the more limited public access allowing for survey work.

b) the outputs may be slightly skewed by the size of some LDUs, particularly true of the Southern Magnesian Limestone NCA where LDUs can be very large. In this situation, the LDUs are too large to pick up the remaining very small areas of significant environmental value, where the conservation of these areas continues to be a key objective.



1







Transport Assessment

Proposed Residential Development

Bridgemont, High Peak

Prepared for: Treville Properties

January 2023

Doc Ref: LB/200341/TA/3



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Document Revision Control

Revision	Date	Status	Prepared By	Approved By
0	13.07.20	Draft	LB	PT
1	22.07.20	Final	LB	PT
2	26.01.23	Update	LB	PT
3	10.02.23	Update	LB	PT

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1.0 INTRODUCTION

Overview

1.1 SCP have been appointed by Treville Properties to provide specialist transport planning and engineering advice in support of an outline application for the proposals for 42 no. affordable homes on land to the west of Bridgemont, Whaley Bridge. Further details on the proposed development are provided later in Chapter 3 of this report.

Planning Background

- 1.2 A planning application for 46 residential dwellings was submitted to High Peak Borough Council (HPBC) in May 2020. The application was supported by a Transport Assessment (TA) dated July 2020 which was prepared by SCP Transport and was reviewed by Derbyshire County Council (DCC) as the acting Highway Authority. DCC Highways provided comments in a response dated August 2020 and a copy of the response is provided in **Appendix A**. In their comments, DCC acknowledged that the proposals were unlikely to have an adverse effect on the local highway network however they requested more details for clarification and revision.
- 1.3 The application was subsequently refused in February 2022 and a copy of the decision is also provided in **Appendix A**. Reason for refusal no. 4 states the following:-
 - "Insufficient information has been submitted with the application relating to matters of access in order to assess adequately the impacts of the proposed development having regard to matters of highway safety and design for the development proposal. In the absence of this information, it has not been possible to demonstrate that the proposal would comply with Policies S1, CF6 and Appendix 1 of the Adopted High Peak Local Plan 2016 and / or any other material considerations."
- 1.4 Further discussions have taken place with DCC Highways in order to agree the proposed access and a copy of the correspondence is provided in **Appendix A**.

Purpose and Structure of Report

1.5 This TA has been prepared to address the concerns raised by DCC Highways in the previously refused application and demonstrate that the proposed development of this site can be accommodated without detriment to the operational capacity or safety of the local highway network. This TA is broadly consistent with the TA dated July 2020 and has been updated based on discussions with DCC Highways since the original submission.



- 1.6 This report has been developed in accordance with the now superseded Department for Transports (DfT's) March 2007 "Guidance on Transport Assessment" document and gives due regard to the National Planning Practice Guidance (NPPG) and the National Planning Policy Framework (NPPF).
- 1.7 The structure of the TA is set out as follows:-
 - Chapter 2 describes in detail the site location and composition, surrounding area, local highway network, existing traffic conditions and road safety record;
 - Chapter 3 defines the development proposals including the proposed access, servicing and car parking arrangements;
 - Chapter 4 summarises the national, regional and local transport policies and describes how the proposed development accords with these;
 - Chapter 5 considers the location of the site with regard to the existing local sustainable transport infrastructure;
 - Chapter 6 estimates the number of multimodal trips generated by the development and distributes and assigns the vehicular trips on the local highway network;
 - Chapter 9 provides summary and conclusions to this TA derived from the analysis presented in the above Chapters.



2.0 EXISTING CONDITIONS

General

2.1 This Chapter provides a detailed description of the location of the site and composition, local highway network, existing traffic conditions and road safety record.

Site Location and Composition

- 2.2 The application site is located within the village of Bridgemont, approximately 1.3 km to the south of Furness Vale and 700m to the north of Whaley Bridge.
- 2.3 The site the site is located within Green Belt and comprises a mixture of undeveloped and previously developed land. Part of the site was previously used as a car park for the former Dog and Partridge Public House. The Dog and Partridge has since closed and has been redeveloped for housing. Part of the site has also been used for housing poultry, for keeping horses domestically and the parking of vehicles related to these uses. The site also includes a section of the verge along the western side of Bridgemont.
- 2.4 The site is bounded by Bridgemont Nursery to the north-east, terraced residential properties and Bridgemont to the east, woodland to the south-east and the Stockport, Disley & Whaley Bridge Railway Line to the west.
- 2.5 The location of the site in relation to the wider highway network is shown on **Figure 2.1** below.



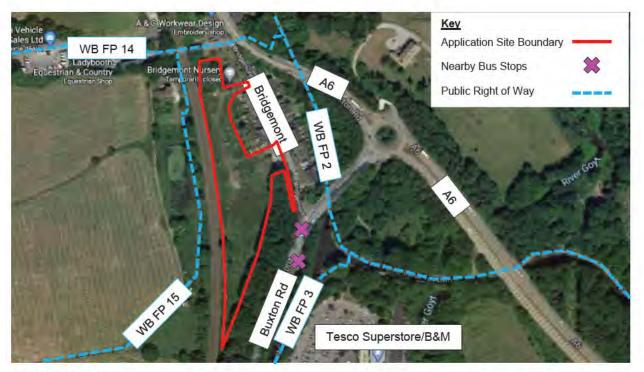
Figure 2.1 - Site Location - Wider Highway Network



2.6 The location of the site in relation to the local highway network is shown on Figure 2.2 below.



Figure 2.2 - Site Location - Local Highway Network



Source: Google Maps

- 2.7 Vehicular access to the site is currently provided via the access to the former Dog and Partridge public house car park.
- 2.8 There are a number of Public Rights of Way (PROW) in the vicinity of the site. Whaley Bridge FP 14 (WBF FP 14) is located directly to the north of the site and provides a link between the A6 and Ringstones Caravan Park.
- 2.9 WB FP 15 is located immediately to the east of the site and provides a link between WB FP14 and Hockerley Lane in the south-west.
- 2.10 WB FP 2 is located to the east of the site along the Peak Forest Canal Towpath and provides links between Newtown in the north-west and Buxworth in the south-east.
- 2.11 WB FP 3 is located to the south-east of the site and provides a link between WB FP 2 and Market Street in Whaley Bridge town centre.
- 2.12 The nearest bus stops are located approximately less than 200m to the south-east of the site along Buxton Road. These stops are served by regular buses to destinations including Disley, New Mills, Macclesfield, Glossop, Buxton, Chapel-en-le-Frith, Marple, Stockport and Manchester Airport. Further details on public transport are provided in Chapter 5.



2.13 Whaley Bridge Railway Station is located approximately 1.0km walking distance to the south of the site and Furness Vale Railway Station is located approximately 1.2km to the north-east walking distance of the site.

Local Highway Network

Bridgemont

- 2.14 Bridgemont is located along the eastern boundary of the site and is a cul-de-sac that provides access to the A5004 Buxton Road to the south-east. Bridgemont serves a number of uses including residential but also serves Bridgemont Nursery, a motor vehicle dealer, equestrian shop and fitness centre, amongst other uses.
- 2.15 Within the immediate vicinity of the site Bridgemont has a carriageway width of approximately 9.3m and has a continuous footway along the eastern section of the carriageway. A footway is provided along the western section of the carriageway between the former Dog and Partridge public house and for approximately 100m north. There is currently no footway along the western section of the carriageway between the former Dog and Partridge public house and the A5004 Buxton Road / A6 junction.
- 2.16 Within the vicinity of the site Bridgemont benefits from street lighting and is subject to a mandatory speed limit of 30mph.

A5004 Buxton Road

- 2.17 The A5004 Buxton Road is located to the south-west of the site and provides a link between the A6 and the A53 in Buxton Town Centre.
- 2.18 Within the vicinity of the site, the A5004 Buxton Road has a carriageway width of between approximately 6.8m-7.2m. To the south of the A5004 Buxton Road/Bridgemont junction, a continuous footway is provided on the eastern section of the carriageway towards Whaley Bridge Town Centre. Within the vicinity of the site, the A5004 Buxton Road benefits from street lighting and is subject to a mandatory speed limit of 40mph.
- 2.19 There are currently no cycle facilities located along the A5004 Buxton Road, however a number of cyclists use this route.

<u>A6</u>

2.20 The A6 is located to the north-east of the site and is a major distributor route which provides a link between the A57 in Manchester City Centre and the A38 near Derby.



- 2.21 Immediately to the north-west of the A6/A5004 Buxton Road roundabout the A6 has a carriageway width of approximately 10m and immediately to the south-east of the A6/A5004 Buxton Road roundabout the A6 is a dual carriageway with a width of approximately 16m.
- 2.22 Within the vicinity of the site, the A5004 Buxton Road benefits from street lighting and is subject to a mandatory speed limit of 30mph.

A5004 Buxton Road/Bridgemont Priority Controlled T-Junction

- 2.23 The A5004 Buxton Road/Bridgemont junction is located to the south-east of the site and is a priority controlled T-Junction with the A5004 Buxton Road forming the major arms and Bridgemont the minor arm, as shown on Figure 2.3 below.
- 2.24 Dropped kerbs and tactile paving are provided along the minor arm of the junction in order to further assist pedestrians.



Figure 2.3 - A5004 Buxton Road/Bridgemont Priority Controlled T-Junction

A6/A5004 Buxton Road Priority Controlled Roundabout

2.25 The A6/A5004 Buxton Road/Bridgemont roundabout is located to the east of the site and is a 4-arm priority controlled roundabout. The layout of the roundabout is shown on Figure 2.4 below.





Figure 2.4 – A6/A5004 Buxton Road Priority Controlled Roundabout

Road Safety

- 2.26 The Planning Practice Guidance (PPG) 'Transport evidence bases in plan making and decision taking' document states that, "Critical locations on the road network with poor accident records should be identified. This is to determine if the proposed development will exacerbate existing problems or, if proposed, whether highway mitigation works or traffic management measures will help to alleviate the problems".
- 2.27 In order to identify critical locations on the network with a poor accident record, the personal injury accident data has been obtained from Crash Map for the most recently available 5-year period ending 31st December 2021. The location and severity of the accidents are shown on Figure 2.5 below:-



Figure 2.5 - Road Safety Plan



- 2.28 The key points derived from the 5-year accident analysis are summarised below:-
 - No accidents occurred along Bridgemont including along the site boundary and site access;
 - No accidents occurred at the A5004 Buxton Road/Bridgemont junction; and
 - Two accidents occurred at the A6/A5004 Buxton Road roundabout which were both of slight severity.
- 2.29 Whilst any traffic accident is regrettable, due to the very low number of accidents recorded and the severity of the accident, the road safety record does not represent a material concern in the context of the proposed development.



3.0 PROPOSED DEVELOPMENT

Overview

- 3.1 The planning application is in outline and comprises a residential development for up to 42no. affordable dwellings comprising the following indicative mix:
 - 2 no. 1-bed cottage flats;
 - 24 no. 2-bed houses; and
 - 16 no. 3-bed houses.
- 3.2 The development proposals are shown on the indicative site layout plan presented in **Appendix B**.

Proposed Access Arrangements

- 3.3 Vehicular access to the site will be provided via the existing access to the former Dog and Partridge public house car park, as shown on drawing SCP/200341/F03 presented in Appendix
 C. In addition, two dwellings will take direct access along Bridgemont.
- 3.4 The existing vehicular access will be upgraded to typical residential standards and provide a 5.5m wide carriageway.
- 3.5 The site access will provide visibility splays that have an 'x' (minor arm setback distance) of 2.4m and a 'y' (major road visibility) distance of 43m in either direction which exceeds the guidance presented in the Manual for Streets (MfS) for a 30mph road, as shown on the drawing presented in **Appendix C**.
- 3.6 The proposed access has been designed in accordance with the comments provide by DCC Highways dated February 2022 and a copy of the comments is provided in **Appendix A.**
- 3.7 Pedestrian access to the site will be provided from the same location as the vehicular access. In addition, separate pedestrian links will be provided at the northern and southern sections of the site onto Bridgemont and Buxton Road.
- 3.8 A footway will be provided along the sites frontage which will link the existing footway along the western section of Bridgemont and the Bridgemont/A5004 Buxton Road junction.



Internal Road Layout and Servicing

3.9 The internal layout will be developed with the principles set out in the MfS. Details such as crossing points, dropped kerbs and tactile paving will be provided in the detailed application.

Parking

Car Parking

- 3.10 Car parking standards for residential development are presented in High Peak Borough Council's2016 Local Plan and are summarised below:
 - 1/2 bedrooms 1.5 spaces per unit;
 - 3 bedroom 2 spaces per unit; and
 - 4+ bedrooms 3 spaces per unit.

Cycle parking:

- 1/2/3 bedrooms 1 cycle parking space per unit if no garage or shed provided;
- 4+ bedroom 1 cycle space per unit if no garage or shed provided; and
- Motorcycle parking no standard.
- 3.11 The proposed development provides parking in accordance with HPBC's standards.



4.0 PLANNING POLICY CONTEXT

Introduction

4.1 This Chapter provides a summary of relevant national, regional and local transport policies and provides a brief analysis of how the proposed development will contribute towards their aims and objectives.

Introduction

4.2 This chapter provides a summary of relevant national, regional and local transport policies and provides a brief analysis of how the proposed development will contribute towards their aims and objectives.

National Planning Policy Framework (NPPF)

- 4.3 Travel plans are secured through a policy framework that extends from national through to local level when dealing with new development proposals.
- 4.4 Travel plans are currently secured within the planning system within the context of the government's **National Planning Policy Framework** (NPPF), which was produced in 2012 and recently updated in July 2021.
- 4.5 The NPPF aims to provide a framework within which locally-prepared plans for housing and other development can be produced. The framework aims to streamline the planning process, making it more accessible at neighbourhood and community level and simplifying the decision-making process.
- 4.6 The NPPF aims to promote sustainable transport, and ensure that transport issues are considered from the earliest stages of plan making and development proposals so that:
 - The potential impacts of development on transport networks can be addressed.
 - Opportunities from existing or proposed transport infrastructure and changing transport technology and usage are realised.
 - Opportunities to promote walking, cycling and public transport use are identified and pursued.
 - The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account.
 - Patterns of movements, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.



- 4.7 Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health.
- 4.8 The document states that all developments which generate significant amounts of movement should be required to provide a travel plan, and that the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.
- 4.9 The NPPF is supported by a number of **Planning Practice Guidance notes (2014).** One such note provides guidance on 'Travel Plans, Transport Assessment and Statements in Decision-Taking'. The guidance specifies that travel plans should be:
 - Proportionate to the size and scale of the development;
 - Established at the earliest practicable possible stage of a development proposal;
 - · Be tailored to local circumstances; and
 - Be brought forward through collaborative working with the Local Planning Authority, transport operators, along with communities and local businesses where relevant etc.
- 4.10 The guidance note goes on to provide suggestions for the content of a travel plan in terms of baseline data, the nature of the development, proposals to reduce the need to travel by all modes of transport, and monitoring.

Derbyshire County Council Local Transport Plan

- 4.11 Derbyshire Local Transport Plan was published in 2011 and sets out the transport vision, goals, challenges to be tacked and a strategy covering the period to 2026. The vision aims to achieve a transport system that is both fair and efficient, promotes healthier lifestyles, safer communities, safeguards and enhances the natural environment and provides better access to jobs and services. Whilst also improving choice and accessibility of transport and integrating economic, social and environmental needs.
- 4.12 The five transport goals are:
 - Supporting a resilient local economy
 - Tackling climate change.
 - Contributing to better safety, security and health;
 - Promoting equality of opportunity;
 - Improving quality of life and promoting a healthy natural environment



4.13 The plan puts emphasis on supporting a resilient local economy, contributing to better safety, security and health, and improving quality of life and promoting a healthy natural environment.

High Peak Local Plan

4.14 Policy CF 6 of the High Peak Local Plan states the following:

"Accessibility and Transport

The Council will seek to ensure that development can be safely accessed in a sustainable manner. Proposals should minimise the need to travel, particularly by unsustainable modes of transport and help deliver the priorities of the Derbyshire Local Transport Plan.

This will be achieved by:

Delivering sustainable patterns of development

- Ensuring that additional growth within the Market Towns and Larger Villages is managed and where possible, accompanied by accessibility improvements
- Promoting a balanced distribution of housing and employment
- Ensuring the development of social, cultural and community facilities in locations that allow for ease of access by multiple methods of transportation
- Requiring that all new development is located where the highway network can satisfactorily accommodate traffic generated by the development or can be improved as part of the development
- Requiring that new development can be integrated within existing or proposed transport infrastructure to further ensure choice of transportation method and enhance potential accessibility benefits
- Supporting proposals for new community assets and facilities where these are required to meet the needs of the Plan Area or lead to the provision of additional assets that improve community well-being
- Requiring that facilities are well related to public transport infrastructure and provide high standards of accessibility to all sectors of the community
- Supporting innovative schemes to secure the local delivery of public services in rural communities and other areas with poor public transport, in particular the delivery of some



services through the use of mobile services and technology will be encouraged where this results in better local provision

- Ensuring development does not lead to an increase in on street parking to the detriment of the free and safe flow of traffic
- Supporting transport infrastructure and services
- Supporting the implementation of the A6 Corridor Transport Strategy in Buxton and the Central Area. Specific measures are identified in the relevant Local Plan policies and Infrastructure Delivery Plan
- Supporting highways and junction improvements required to address the cumulative impact of development across High Peak as identified in the High Peak Local Plan

Transport Study and Infrastructure Delivery Plan

- Promoting the maintenance and introduction of appropriate facilities to support cyclists, pedestrians and horse riders, ensuring that development supports the use of local cycleway and pathway networks to improve choice of travel and ensuring safe access to developments on foot and by bicycle
- Encouraging and promoting improvements to public transport networks in association with the Local Highway Authority, Network Rail and other providers Supporting the use of rail for the transportation of freight wherever feasible to do so
- Approving developments provided that the capacity and design of the transport network serving the site will reasonably accommodate the anticipated increase in travel without materially harming highway safety or local amenity. In addition, the traffic generated by the development will not unduly interrupt the safe and free flow of traffic on trunk or primary roads or materially affect existing conditions to an unacceptable extent Requiring applicants to submit and implement Travel Plans (or Travel Plan Statements) and Transport Assessments to support relevant proposals, as advised by the Highways Authority. Consultation with Network Rail when development may impact on the rail network, including impacts on level crossings will also be required. Where appropriate, Transport Assessments will consider the impact on the rail network and identify appropriate mitigation measures Developments that will result in a material increase or significant change in the character of traffic using a rail crossing will be refused, unless it



can be demonstrated that safety will not be compromised in consultation with Network Rail

Requiring applicants to submit details of parking which includes the proposed parking
provision based on an assessment of the parking needs of the development and the
impact on the surrounding road network. Developments which will lead to an increase in
traffic or include parking provision will need to submit details. The details should be
proportionate to the impact of the development. Guidance on parking is given in Appendix
1.

Developer contributions or funding pooled through a Community Infrastructure Levy will be used to deliver transport and accessibility improvements required to accord with this policy. Further details are provided in Policy CF7 and Infrastructure Delivery Plan. In the event that a Community Infrastructure Levy is adopted, the Regulation 123 "Infrastructure List" will also specify appropriate measures to be funded."

Summary

- 4.15 In general, the national, regional and policies set out above promote common aims in respect of reducing car borne trips and encouraging travel by sustainable modes such as public transport, walking and cycling. In particular, policy advocates locating developments that generate significant movement where there is high quality infrastructure and sustainable transport modes can be maximised.
- 4.16 The following chapter demonstrates that the proposed development is well located in relation to sustainable transport facilities making the development accessible to non-car modes of transport. The development proposals are therefore considered to be in accordance with the thrust of national, regional and local policy aims.



5.0 SUSTAINABLE TRANSPORT APPRAISAL

General

5.1 This Chapter presents a review of the accessibility of the site by walking, cycling and public transport modes. Policies to encourage travel by sustainable modes are developed further within the Interim Travel Plan for the development that accompanies this application.

Pedestrians

- 5.2 The MfS states that walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes' (up to about 800m) walking distance of areas which residents may access comfortably on foot. However, it goes on to state that this is not an upper limit and that walking offers the greatest potential to replace short car trips, particularly those under 2km.
- 5.3 The pedestrian accessibility of the development has been modelled using Geographical Information System (GIS) software to produce isochrones mapping. The purpose of the isochrones is to demonstrate the areas within an acceptable walk distance of the site, as shown on the plan presented in **Appendix D**.



5.4 These plans demonstrates that the site is within acceptable walking distance of Whaley Bridge, Buxworth and Furness Vale centres which contain a wide range of facilities, including the following:

Bus Stops
Rail Stations
Co-op Food
Tesco Superstore (incl Tesco Clothing)
B&M Store
Takeaways
Cafes
Restaurants
Public Houses
Bridgemont Nursery
Whaley Bridge Primary School
Buxworth Primary School
Furness Vale Primary School
Bingswood Indsutrial Estate
Bridgemont Village Hall
Parks/Playgrounds
Whaley Bridge Skatepark
Warriors Fitness Centre
Synergy Performance Fitness
Whaley Bridge Cricket Club
Whaley Bridge Athletic Football Club
Whaley Bridge Bowling Club
Toddbrook Sailing Club

- 5.5 Pedestrian access to the site will be provided from the same location as the vehicular access. In addition, separate pedestrian links will be provided at the northern and southern sections of the site onto Bridgemont and Buxton Road.
- 5.6 There are a number of PROW in the vicinity of the site including WB FP 2 which is located to the east of the site along the Peak Forest Canal Towpath and provides traffic free links between Newtown in the north-west, Buxworth in the south-east.

Cyclists

5.7 Transport policy identifies that cycling represents a realistic and healthy option to use of the private car for making journeys up to 5km as a whole journey or as part of a longer journey by public transport.



- 5.8 **Appendix F** illustrates the 5km cycle catchment area around the site, which is roughly equivalent to a 25 minute cycle time. The plan demonstrates that New Mills and Chinley are located within 5km of the development, as well as the surrounding villages.
- 5.9 National Cycle Route (NCR) 68 is located approximately 1.2km cycle distance to the east of the site and provides access to the nearby areas of New Mills and Buxton.
- 5.10 The local cycle routes taken from DCC's online cycle map are shown **Appendix E**.
- 5.11 The Peak Forest Canal Towpath is located to the east of the site and also provides cycle access to Whaley Bridge, New Mills and Chinley.
- 5.12 There are currently no cycle facilities located along the A5004 Buxton Road, however a number of cyclists use this as a cycle route. As mentioned previously, a footway/cycle will be provided along the western section of Buxton Road which will provide a continuous pedestrian/cycle link between the application site and Tesco superstore, as shown on the indicative plan provided on **Appendix F.**



Public Transport

- 5.13 In terms of bus services, the Chartered Institute of Highways & Transportation's (CIHT's) "Guidelines for Planning for Public Transport in Developments" document identifies, at section 6.20, that "Bus stops are located to minimise passengers' walking distance to their final destination. The maximum walking distance to a bus stop should not exceed 400m and preferably be no more than 300m."
- 5.14 The nearest bus stops are located along the A5004 Buxton Road. The bus stops for northbound services is approximately 160m and for southbound is approximately 190m based on walking distance from the centre of the site. Both bus stops are therefore well within the recommended walking distance. Further bus stops are located approximately 700m to the north of the site along the A6 Buxton Road. Services from these stops are summarised in Table 5.1 below.

Table 5.1 - Bus Service Summary

Service		Mon-Fri		Sat		Sun	
Number	Route	Av. Frequency	Approx. First/Last	Av. Frequency	Approx. First/Last	Av. Frequency	Approx. First/Last
040	Bridgemont - Buxworth - Chinley - Chapel High School	1 sch	ool service	No S	ervice	No S	ervice
60 / 60A	Hayfield – New Mills – Whaley Bridge	1- 2 hours	07:36 – 16:22	1- 2 hours	07:36 – 16:20	No service	No service
61	Glossop - New Mills - Buxton	1.5 hours	07:00 – 18:36	1.5 hours	07:59 – 18:36	3 services per day either way	11:04 – 17:34
190	Buxton - Upper End - Chapel - Whaley Bridge	1- 2 hours	09:29 – 18:33	1- 2 hours	09:48 – 18:49	No service	No service
199 Skyline	Buxton - Chapel - Disley - Stockport - Airport	20-30 mins	05:59 – 00:03	20-30 mins	05:59 – 00:03	1 hour	06:54 - 18:53 (night services at 21:53 and 03:55)

- 5.15 The nearby bus stops provide regular services throughout the day to locations including Whaley Bridge Town Centre, Buxton and Stockport.
- 5.16 Whaley Bridge Railway Station is located approximately 1.0km walking distance to the south of the site is therefore within an acceptable walking distance, however cycle parking with CCTV is also at the station.
- 5.17 Whaley Bridge Railway Station is served by the Buxton to Manchester Piccadilly line via Chapelen-le-Frith Levenshulme and Stockport with frequent train services provided throughout the week.



- 5.18 Furness Vale Railway Station is located approximately 1.2km walking distance to the north-west of the site is therefore within an acceptable walking distance, however cycle parking with CCTV is also provided at the station. Furness Vale Railway Station is also served by the Buxton to Manchester Piccadilly line and therefore provides similar services.
- 5.19 The plan in **Appendix G** indicates a 60 minute public transport journey from the site. The time includes the walk to the nearby bus stops and railway stations, demonstrating that it is possible to reach areas such as Buxton, Macclesfield, Stockport and Manchester City Centre within an acceptable commute time.

Summary

- 5.20 This section demonstrates that the site is located within an area considered accessible by noncar modes of travel. The site is located within an acceptable walk distance of Whaley Bridge centre, Buxworth and Furness Vale centres which contain a wide range of facilities.
- 5.21 A footway will be provided along the sites frontage which will link the existing footway along the western section of Bridgemont and the Bridgemont/A5004 Buxton Road junction. In addition, a footway/cycle will be provided along the western section of Buxton Road which will provide a continuous link between Bridgemont and the Tesco superstore access. This will be a benefit for both existing and prospective residents and for those accessing the Tesco superstore.
- 5.22 The nearby bus stops provide regular services throughout the day to locations including Whaley Bridge Town Centre, Buxton and Stockport. There are also two railway stations within an acceptable walking distance of the site which provide regular services to locations including Stockport and Manchester City Centre.



6.0 TRIP GENERATION, DISTRIBUTION, ASSIGNMENT AND HIGHWAY IMPACT

Overview

- 6.1 This chapter provides an estimate the number of multi-modal trips generated by the proposed uses of the site, along with the distribution and assignment of vehicular traffic on the local highway network.
- As mentioned previously, the planning application comprises a residential development for up to 42no. affordable dwellings comprising 40no. houses and 2no. cottage flats.

Trip Generation

Affordable Houses

- 6.3 To estimate the trip generating potential of the proposed affordable houses, the TRICS Database has been interrogated for surveys of developments similar to that proposed.
- 6.4 The selection criteria for the affordable houses TRICS-based trip rates is as follows:-
 - Land use Residential / Affordable/Local Authority Houses;
 - London and NI / Ireland sites excluded;
 - Multimodal surveys; and
 - Based on number of dwellings.
- 6.5 The TRICS outputs are presented in **Appendix H** with the trip rate summarised in **Table 6.1** below:-

Table 6.1 – Proposed Affordable Houses Trip Rates (Trip Rate per Dwelling)

Mode	Weekday AM Peak Hour (08:00 to 09:00)		Weekday PM Peak Hour (17:00 to 18:00)	
	Arrivals	Departures	Arrivals	Departures
Vehicles	0.142	0.25	0.276	0.181
Cyclists	0.004	0.022	0.039	0.026
Pedestrians	0.099	0.513	0.267	0.220
Public Transport	0.000	0.091	0.030	0.004

6.6 The above trip rates have been applied to the proposed 42 dwellings to determine the multi-modal trip generation for the development, as summarised in **Table 6.2** below.



Table 6.2 - Proposed Residential Use Trip Generation

Mode	Weekday AM Peak Hour (08:00 to 09:00)		Weekday PM Peak Hour (17:00 to 18:00)	
	Arrivals	Departures	Arrivals	Departures
Vehicles	6	11	12	8
Cyclists	0	1	2	1
Pedestrians	4	22	11	9
Public Transport	0	4	1	0

- 6.7 The proposed development will result in a maximum increase of only 17 two-way vehicles during the AM peak hour and 20 two-way vehicles during the PM peak hour. Volumetrically, this equates to approximately one additional vehicle movement every 3-4 minutes during the peak hours.
- 6.8 The trip generation associated with the previous use of the site (public house car park, housing poultry, for keeping horses domestically) has not been taken into account as part of the net trip generation. In addition, the trip rates for houses have been applied to the cottage flats when in reality these two dwellings are unlikely to generate any traffic during the peak hours.
- 6.9 The trip generation detailed in Table 6.2 is therefore considered highly robust. Furthermore, the redevelopment will tend to generate only car-based traffic compared to the more onerous HGV / farm vehicle traffic associated with the that previous uses.

Trip Distribution and Assignment

6.10 An assumed 50/50 northbound/southbound split has been applied to the A5004 Buxton Road/Bridgemont junction. The traffic assignment is summarised in **Table 6.6** below:

Table 6.6 – Peak Hour Trip Generation at Nearby Junctions

	Two-Way Peak Hour Trip Generation		
	AM	PM	
Site Access along Bridgemont	17	20	
A5004 Buxton Road/Bridgemont Junction	17	20	
Two-WayA6/A5004 Buxton Road Roundabout	8	10	

6.11 As shown on Table 6.6, the traffic impact of the development will be imperceptible on the wider highway network and detailed capacity assessments of the nearby junctions are not therefore required as part of this TA.



7.0 SUMMARY AND CONCLUSIONS

- 7.1 SCP have been appointed by Treville Properties to provide specialist transport planning and engineering advice in support of an outline application for the proposals for 42 no. affordable homes on land to the west of Bridgemont, Whaley Bridge.
- 7.2 A planning application for 46 residential dwellings was submitted to High Peak Borough Council (HPBC) in May 2020 which was subsequently refused in February 2022. Reason no. 4 of the refusal states "Insufficient information has been submitted with the application relating to matters of access in order to assess adequately the impacts of the proposed development having regard to matters of highway safety and design for the development proposal..." This Transport Assessment (TA) has been prepared to address the concerns raised by DCC Highways in the previously refused application and demonstrate that the proposed development of this site can be accommodated without detriment to the operational capacity or safety of the local highway network. This TA is broadly consistent with the TA dated July 2020 and has been updated based on discussions with DCC Highways since the original submission.
- 7.3 Vehicular access to the site will be provided via the existing access to the former Dog and Partridge public house car park. The access will provide a 5.5m wide carriageway.
- 7.4 Pedestrian access to the site will be provided from the same location as the vehicular access. In addition, separate pedestrian links will be provided at the northern and southern sections of the site onto Bridgemont and Buxton Road.
- 7.5 The site is located within an acceptable walk distance of Whaley Bridge centre, Buxworth and Furness Vale centres which contain a wide range of facilities. A footway will be provided along the sites frontage which will link the existing footway along the western section of Bridgemont and the Bridgemont/A5004 Buxton Road junction. In addition, a footway/cycle will be provided along the western section of Buxton Road which will provide a continuous link between Bridgemont and the Tesco superstore access. This will be a benefit for both existing and prospective residents and for those accessing the Tesco superstore.
- 7.6 There are nearby bus stops which provide regular services throughout the day to locations including Whaley Bridge Town Centre, Buxton and Stockport. There are also two railway stations within an acceptable walking distance which provide further access to major key destinations including Stockport and Manchester City Centre.



- 7.7 The personal injury accident data for the most recently available five year period for the most recently available five year period has been reviewed and does not represent a material concern in the context of the proposed development.
- The proposed development will result in a maximum increase of only 17 two-way vehicles during the AM peak hour and 20 two-way vehicles during the PM peak hour. Volumetrically, this equates to approximately one additional vehicle movement every 3-4 minutes during the peak hours. The trip generation associated with the previous use of the site (public house car park, housing poultry, for keeping horses domestically) has not been taken into account as part of the net trip generation. In addition, the trip rates for houses have been applied to the cottage flats when in reality these two dwellings are unlikely to generate any traffic during the peak hours. The trip generation analysis presented in this report is therefore considered highly robust. Furthermore, the redevelopment will tend to generate only car-based traffic compared to the more onerous HGV / farm vehicle traffic associated with the that previous uses. Based on the proposed trip generation, detailed capacity assessments of the nearby junctions have not been undertaken.
- 7.9 Having regard to the above, it is concluded that there is no highway-related reason to withhold planning permission for the scheme and the proposed development is therefore commended for approval.

S|C|P APPENDIX A

Mr Rawdon Gascoigne Emery Planning Partnership Ltd Hobson Street Macclesfield Cheshire SK11 8BS Treville Properties and Great Places c/o Agent

Application no: HPK/2020/0180

Determined on: 14/02/2022

Town and Country Planning Act 1990
Town and Country Planning (Development Management Procedure) (England) Order 2015

REFUSAL OF OUTLINE PLANNING PERMISSION

Location of Development:

Land At Bridgemont Bridgemont Whaley Bridge Derbyshire

Description of Development:

Application for Outline Planning Permission with details of access (all other matters reserved) for erection of 38 affordable dwellings

In pursuance of their powers under the above mentioned Act High Peak Borough Council, **HEREBY REFUSE PERMISSION** for the development described in the above application, in accordance with plans ref: Existing Site and Location Plan drawing ref. 311106 01 P13; Indicative Site Plan drawing ref. 311106 02 P18; Proposed Site Access: ref. 311106 04 P8 for the reason(s) specified below:-

- 1. The development does not constitute limited affordable housing for local community needs under policies set out in the development plan. The development therefore does not fall within the exception to inappropriate development at paragraph 149(f) of the Framework. There would also be substantial harm spatially and harm visually to the openness of the Green Belt as well as landscape harm. In addition, the proposal would result in harm to the Green Belt's purpose to assist in safeguarding the countryside from encroachment. Paragraph 148 of the NPPF explains that any harm to the Green Belt attracts substantial weight. As such the development is inappropriate development in the Green Belt. Therefore, the very special circumstances necessary to justify development in the Green Belt do not exist. Accordingly, the proposal is contrary to Policies S1, S2, EQ2, EQ3, EQ4, EQ6, H4 and H5 of the Adopted High Peak Local Plan 2016; Council Supplementary Planning Documents including: Housing Needs in the High Peak (2007) and Landscape Character (2005) and NPPF.
- 2. Network Rail have confirmed that the Council should be satisfied that there would no adverse impacts to the operation of the railway line, which adjoins the western



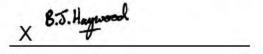


boundary of the site in relation to drainage and noise matters. Without this further information it is not possible to judge whether the proposal is in accordance with Adopted High Peak Local Plan 2016 Policies SS1, EQ6, EQ10 EQ11 in particular and the NPPF.

- 3. Insufficient information has been submitted with the application relating to levels in order to assess adequately the impacts of the proposed development having regard to matters of character and appearance and amenity of both neighbouring properties and future residents of the development proposal. In the absence of this information, it has not been possible to demonstrate that the proposal would comply with Policies S1 and EQ6 of the Adopted High Peak Local Plan 2016 as well as the Council's High Peak Design Guide 2018 and Residential Design Guide 2005, and / or any other material considerations.
- 4. Insufficient information has been submitted with the application relating to matters of access in order to assess adequately the impacts of the proposed development having regard to matters of highway safety and design for the development proposal. In the absence of this information, it has not been possible to demonstrate that the proposal would comply with Policies S1, CF6 and Appendix 1 of the Adopted High Peak Local Plan 2016 and / or any other material considerations.
- 5. Insufficient information has been submitted with the application relating to drainage in order to assess adequately the impacts of the proposed development having regard to matters of local flood risk of the development proposal. In the absence of this information, it has not been possible to demonstrate that the proposal would comply with Policies S1 and EQ11 of the Adopted High Peak Local Plan 2016 and / or any other material considerations

Informatives

1. The Local Planning Authority (LPA), in reaching this decision, has followed the guidance in paragraph 38 of the National Planning Policy Framework. The Framework advises that the LPA should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area. It was not possible to suggest amendments which could overcome the harm in principle identified above.



Signed by: Ben Haywood

On behalf of High Peak Borough Council

NOTES

- 1. If you are aggrieved by the decision of your local planning authority to refuse permission for the proposed development or to grant it subject to conditions, then you can appeal to the Secretary of State under section 78 of the Town and Country Planning Act 1990.
- 2. If the decision to refuse planning permission is for a householder application, and you want to appeal against your local planning authority's decision then you must do so within 12 weeks of the date of this notice. All other types of development have a 6 month deadline for submission of appeals. Appeals must be made using a form which you can get from the Planning Inspectorate at Temple Quay House, 2 The Square, Temple Quay, Bristol BS1 6PN or online at https://www.gov.uk/appeal-planninginspectorate#other-ways-to-apply. The Secretary of State can allow a longer period for giving notice of an appeal, but he will not normally be prepared to use this power unless there are special circumstances which excuse the delay in giving notice of appeal. The Secretary of State need not consider an appeal if it seems to him that the local planning authority could not have granted planning permission for the proposed development or could not have granted it without the conditions they imposed, having regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order. In practice, the Secretary of State does not refuse to consider appeals solely because the local planning authority based their decision on a direction given by him.
- 3. If either the local planning authority or the Secretary of State refuses permission to develop land or grants it subject to conditions, the owner may claim that he can neither put the land to a reasonably beneficial use in its existing state nor render the land capable of a reasonably beneficial use by the carrying out of any development which has been or would be permitted. In these circumstances, the owner may serve a purchase notice on the Council (District Council, London Borough Council or Common Council of the City of London) in whose area the land is situated. This notice will require the Council to purchase his interest in the land in accordance with the provisions of Part VI of the Town and Country Planning Act 1990.



 From:
 Glen Donaldson (Place)

 To:
 Simpkin, Rachael.

 Cc:
 Planning (HPBC)

Subject: HPK/2020/0180 Land at Bridgemont, Whaley Bridge

Date: 06 February 2022 21:36:46

Attachments: <u>image001.png</u>

311106 02 P18 Proposed Site Plan.pdf 311106 04 P8 Proposed Site Access.pdf

Hello Rachael.

As request, the County Council has looked at the amended drawings (see attached) for the above site and offer the following comments:

P8 Proposed Site Assess:

The Highway Authority has no objections to the proposals and should The Planning Authority be minded to permit the application, its recommended the following conditions and informative notes are included in any consent:-

- 1. Space shall be provided within the site for storage of plant and materials, site accommodation, loading, unloading and manoeuvring of goods vehicles, parking and manoeuvring of employees and visitors vehicles, laid out and constructed in accordance with detailed designs first submitted to and approved in writing by the Local Planning Authority. The facilities shall be retained free from any impediment to their designated use throughout the construction period.
- 2. Unless otherwise approved in writing by the Local Planning Authority, the development shall not be commenced until a detailed scheme of highway improvement works for the provision of a footway link between the site and that existing to the south of the proposed site access, together with a programme for the implementation and completion of the works has been submitted to and approved in writing by the Local Planning Authority. No part of the development shall be brought into use until the required highway improvement works have been constructed in accordance with the approved details. For the avoidance of doubt the developer will be required to enter into a 1980 Highways Act S278 Agreement with the Highway Authority in order to comply with the requirements of this Condition.
- 3. Before any other operations are commenced a new junction shall be formed to Bridgemont and provided with visibility sightlines in accordance with a scheme first submitted to and approved in writing by the Local Planning Authority. The area in advance of the visibility sightlines shall be retained throughout the life of the development free of any object above ground level relative to adjoining nearside carriageway channel level.
- 4. Prior to the commencement of the development, details shall be submitted to and approved in writing by the Local Planning Authority showing the means to prevent the discharge of water from the development onto the highway. The approved scheme shall be undertaken and completed prior to the first use of the access and retained as such thereafter.
- In addition, the following Advisory Notes may be included for the information of the applicant:-
- a. Pursuant to Section 163 of the Highways Act 1980, where the site curtilage slopes down towards the public highway measures shall be taken to ensure that surface water run-off from within the site is not permitted to discharge across the footway margin. This usually takes the form of a dish channel or gulley laid across the access immediately behind the back edge of the highway, discharging to a drain or soakaway within the site.
- b. Pursuant to Section 278 of the Highways Act 1980 and the provisions of the Traffic Management Act 2004, no works may commence within the limits of the public highway without the formal written Agreement of the County Council as Highway Authority. Advice regarding the technical, legal, administrative and financial processes involved in Section 278 Agreements may be obtained from the Executive Director of Economy Transport and Environment at County Hall,

Matlock (tel: 01629 538658). The applicant is advised to allow approximately 12 weeks in any programme of works to obtain a Section 278 Agreement.

c. Pursuant to Sections 149 and 151 of the Highways Act 1980, the applicant must take all necessary steps to ensure that mud or other extraneous material is not carried out of the site and deposited on the public highway. Should such deposits occur, it is the applicant's responsibility to ensure that all reasonable steps (e.g. street sweeping) are taken to maintain the roads in the vicinity of *the site to a satisfactory level of cleanliness*.

P18 Proposed Site Plan:

Although there are no major objections to the proposals, the submitted drawing does not show enough information to fully assess the access road, so the following comments apply:

- 1. Notwithstanding the submitted information a subsequent reserved matters or full application shall include design of the internal layout of the site in accordance with the guidance contained in the Delivering Streets and Places Design Guide.
- 2. The previous information showed a gradient from 1:20 to 1:12 and the layout beyond the access did not form a part of the current application and it's recognised that gradients beyond the initial 10m of new access road are likely to be revised as the detailed scheme evolves. It's was requested that the access layout, for the purposes of this application, is terminated 10m into the site and recognised that allaying the major level differences beyond this may prejudice any potential future adoption of the road to be maintained in future at public expense, so can you confirm that this is still the case and the gradients will remain as previously proposed?
- 3. The proposed access drives to the proposed development road shall be no steeper than 1 in 12 for the first 6m from the rear of footway and 1 in 6 thereafter.
- 4. It's noted that the Transport Assessment states that a review of levels, retaining solutions and highway boundary issues will be required, so suitable details will need to be submitted to demonstrate that acceptable access arrangements can be delivered.
- 5. The proposed main site access does not comply with current design criteria. The gradient of the initial 10m of the access road should be no greater than 1 in 30 and 1 in 20 thereafter. Consideration may be given for steeper gradients beyond the initial 10m, however, these should be of short length and demonstrated as being necessary due to existing constraints e.g. topography.
- 6. Suitability of the layout for use by a Large Refuse Vehicle of 11.6m length should be demonstrated by means of appropriate swept paths.
- 7. Without benefit of details printed to scale, it isn't possible to ascertain the width of the proposed road widths, so carriageways and footways should be shown and annotated to be a minimum of 5.5m and 2.0m width respectively.
- 8. Off-street parking should be provided at a level to satisfy your own Authority's standards, each space being of 2.4m x 5.5m minimum dimension with an additional 0.5m of width to any side adjacent to a physical barrier e.g. wall, hedge, fence, etc.
- 9. Measures to prevent surface water run-off from entering the public highway from any areas at a higher level will need to be shown.
- 10. Areas of appropriate dimension should be provided for standing of waste bins on collection days adjacent to, but clear of, the highway. It's recommended that the views of the local collection service are sought with respect to entering the site if the internal layout is to remain private. In the event that collections aren't to be made from within the site, or any part of it, all premises should be located within the recommended maximum carry distance of 25m of a turning facility demonstrated as being suitable for use by a typical supermarket delivery type vehicle.

- 11. The Highway Authority no longer accept shared surfaces within the highway because of the impact that this has on the blind and partially sighted.
- 12. On street residential parking within the highway is no longer allowed by the Highway Authority. Wherever possible, the parking spaces should be provided within the curtilage of the property.
- 13. Adoption of the estate streets is a purely voluntary act between the developer and the Highway Authority and acceptance of the proposals for planning purposes does not in any way compel the Highway Authority to enter into an adoption Agreement at a future date. In the absence of any further amendments to the gradients and for the avoidance of doubt, it is unlikely the streets would be eligible for adoption and they would need to remain privately maintained by the road owner or street frontagers where applicable.
- 14. Any redundant vehicular and pedestrian accesses shall be permanently closed with a physical barrier and the existing crossovers reinstated as footway.
- 15. No Tactile paving shown within the site.
- 16. The access junction to the parking spaces to the rear of proposed dwelling No's 03 to 14 is a concern, generally junction spacing should be 70m, so this will need reassessing.
- 17. Until bedroom numbers per dwelling has been provided, parking provision cannot be assessed.

Therefore, whilst the above comments may not be exhaustive, it's recommended that the applicant is given opportunity to submit revised/ further details to satisfactorily address all of the issues highlighted.

Regards

| Project Engineer | Highways Development Control | Place | Derbyshire County Council



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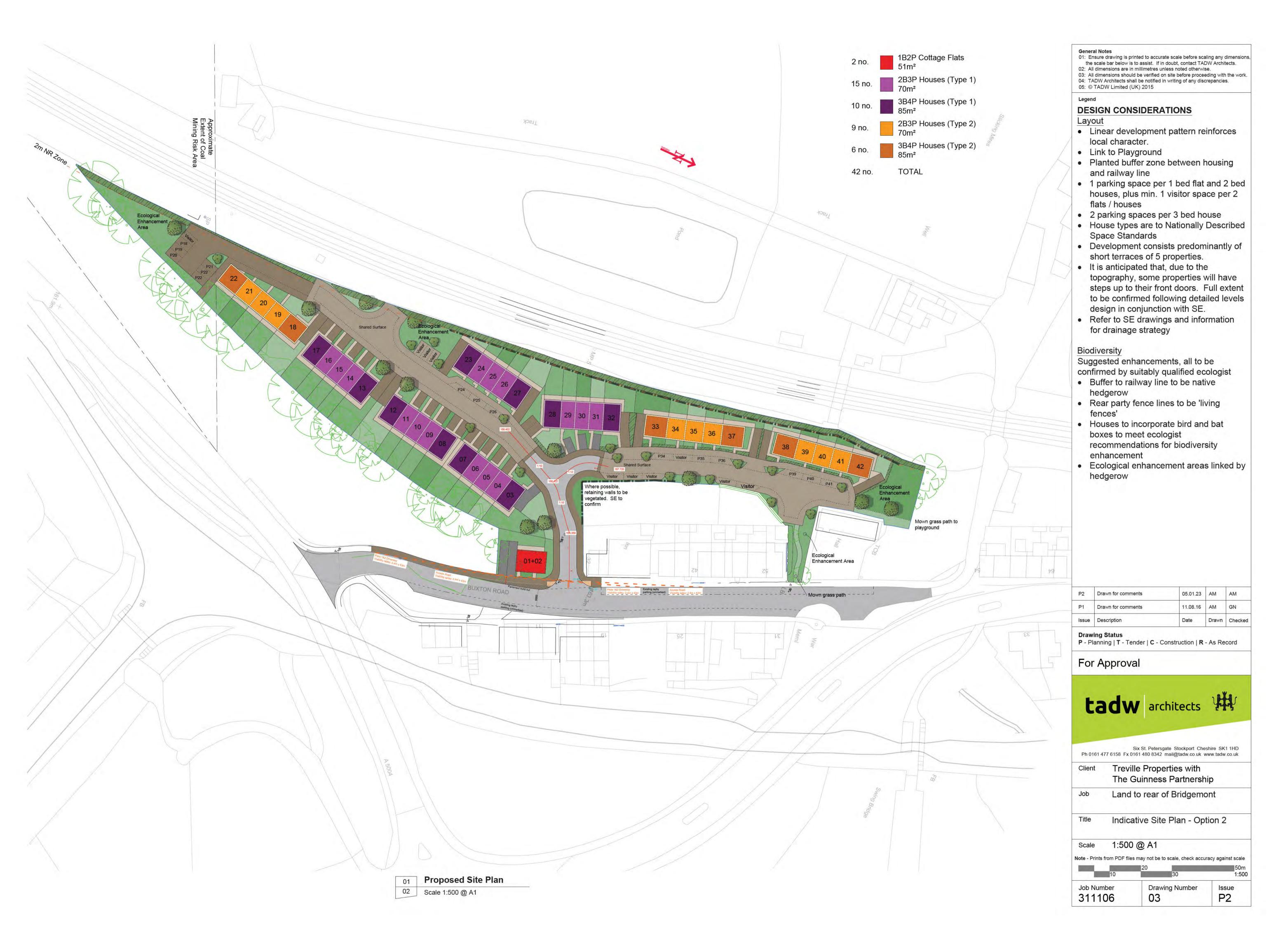
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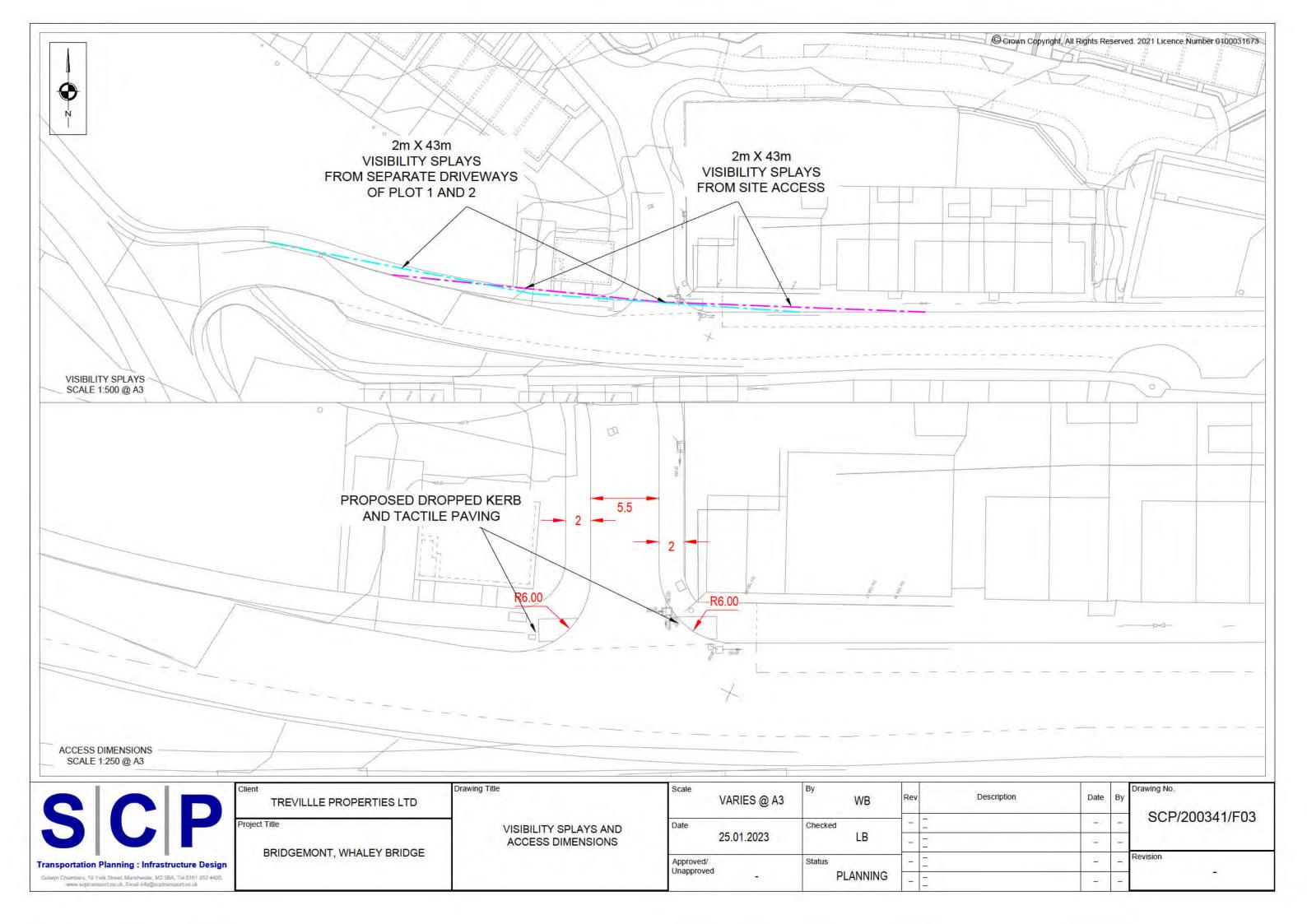
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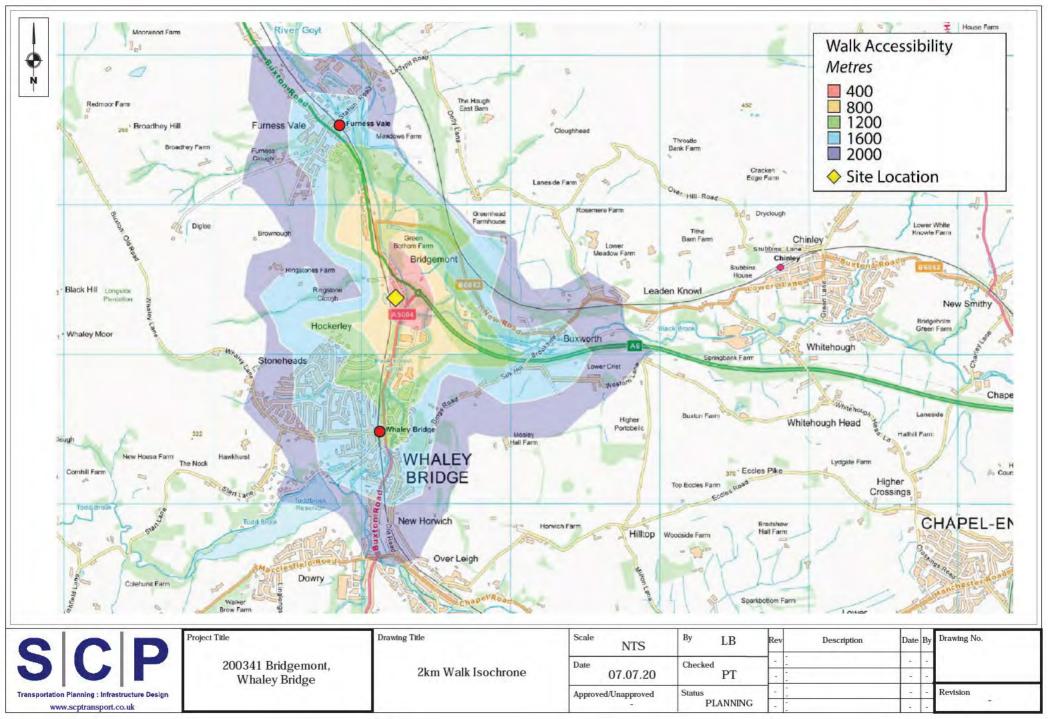
S|C|P APPENDIX B



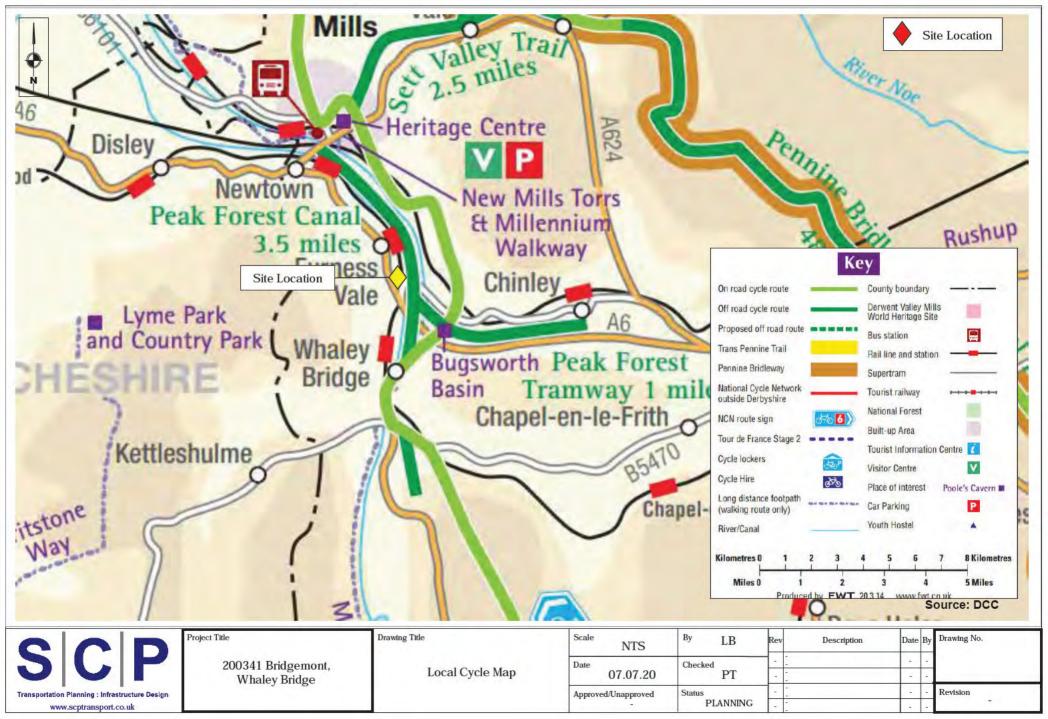
S|C|P APPENDIX C



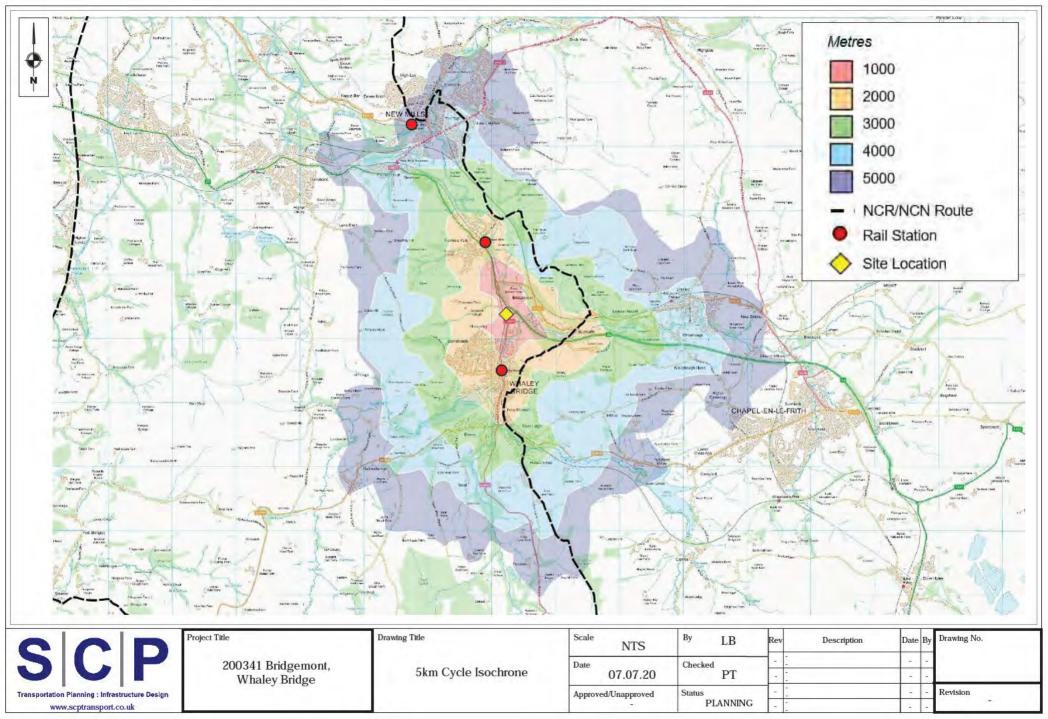
S|C|P APPENDIX D



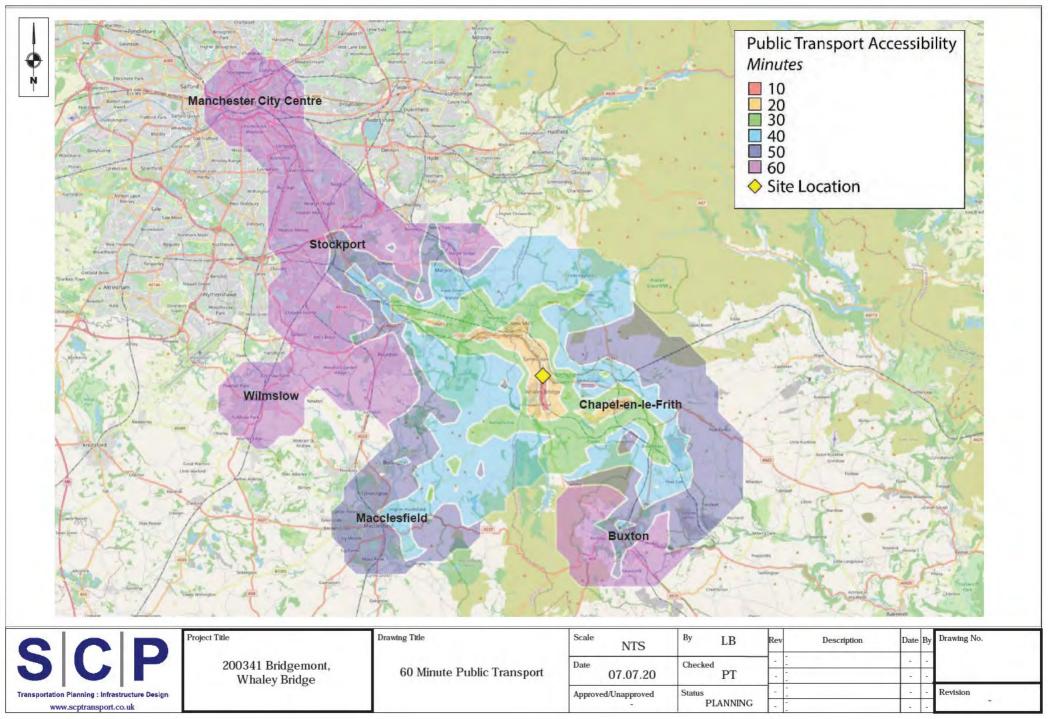
S|C|P APPENDIX E



S|C|P APPENDIX F



S|C|P APPENDIX G



S|C|P APPENDIX H

Licence No: 726001

Calculation Reference: AUDIT-726001-230125-0142

Page 1

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL

Manchester

Category : B - AFFORDABLE/LOCAL AUTHORITY HOUSES

MULTI-MODAL TOTAL VEHICLES

Selected regions and areas:

SCP

York Street

02 **SOUTH EAST** ES EAST SUSSEX 1 days **SOUTH WEST** 03 DV DEVON 1 days 04 **EAST ANGLIA SUFFOLK** 1 days 05 **EAST MIDLANDS LEICESTER** 1 days 07 YORKSHIRE & NORTH LINCOLNSHIRE WY WEST YORKSHIRE 2 days 08 **NORTH WEST**

This section displays the number of survey days per TRICS® sub-region in the selected set

Primary Filtering selection:

MS

MERSEYSIDE

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

1 days

Parameter: No of Dwellings Actual Range: 14 to 54 (units:) Range Selected by User: 14 to 90 (units:)

Parking Spaces Range: All Surveys Included

Parking Spaces per Dwelling Range: All Surveys Included
Bedrooms per Dwelling Range: All Surveys Included

Percentage of dwellings privately owned: All Surveys Included

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/03 to 22/10/21

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Tuesday 3 days Wednesday 1 days Thursday 2 days Friday 1 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count 7 days
Directional ATC Count 0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaking using machines.

Selected Locations:

Suburban Area (PPS6 Out of Centre) 4
Edge of Town 3

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Residential Zone 5
Built-Up Zone 1
No Sub Category 1

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Inclusion of Servicing Vehicles Counts:

Servicing vehicles Included X days - Selected Servicing vehicles Excluded 8 days - Selected

Secondary Filtering selection:

Use Class:

3 7 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order (England) 2020 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 500m Range:

All Surveys Included

Population within 1 mile:

1,001 to 5,000	2 days
10,001 to 15,000	2 days
15,001 to 20,000	1 days
25,001 to 50,000	1 days
50,001 to 100,000	1 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

5,001 to 25,000	1 days
50,001 to 75,000	1 days
75,001 to 100,000	3 days
250,001 to 500,000	2 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

0.6 to 1.0	6 days
1.1 to 1.5	1 davs

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

No 7 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present 7 days

This data displays the number of selected surveys with PTAL Ratings.

Wednesday 25/01/23

SCP York Street Manchester Licence No: 726001

LIST OF SITES relevant to selection parameters

DEVON 1 DV-03-B-01 **TERRACED**

HAM DRIVE **PLYMOUTH**

Suburban Area (PPS6 Out of Centre)

Residential Zone

Total No of Dwellings: 35

06/07/05 Survey date: WEDNESDAY Survey Type: MANUAL

ES-03-B-01 **BUNGALOWS EAST SUSSEX**

BOWLEY ROAD HAILSHAM

Edge of Town Residential Zone

Total No of Dwellings:

Survey date: THURSDAY 03/07/03 Survey Type: MANUAL

LR-03-B-01 **SEMI-DETACHED & TERRACED LEICESTER**

COLEMAN ROAD LEICESTER

Suburban Area (PPS6 Out of Centre)

Residential Zone

Total No of Dwellings: 38

> Survey date: FRIDAY 22/10/21 Survey Type: MANUAL

MS-03-B-01 **TERRACED MERSEYSIDE**

TARBOCK ROAD LIVERPOOL SPEKE Edge of Town

Residential Zone

Total No of Dwellings: 16

Survey date: TUESDAY 18/06/13 Survey Type: MANUAL

5 SF-03-B-01 **SEMI D./TERRACED SUFFOLK**

A1144 ST PETERS STREET

LOWESTOFT

Suburban Area (PPS6 Out of Centre)

No Sub Category

Total No of Dwellings: 46

Survey date: TUESDAY 20/09/05 Survey Type: MANUAL

WY-03-B-02 **MIXED HOUSES WEST YORKSHIRE**

WHITEACRE STREET **HUDDERSFIELD DEIGHTON** Edge of Town Residential Zone

Total No of Dwellings: 54

Survey date: TUESDAY 17/09/13 Survey Type: MANUAL **WEST YORKSHIRE**

WY-03-B-03 **TERRACED HOUSES**

LINCOLN GREEN ROAD

LEEDS

Suburban Area (PPS6 Out of Centre)

Built-Up Zone

Total No of Dwellings: 29

> Survey date: THURSDAY 19/09/13 Survey Type: MANUAL

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

TRIP RATE for Land Use 03 - RESIDENTIAL/B - AFFORDABLE/LOCAL AUTHORITY HOUSES

MULTI-MODAL TOTAL VEHICLES Calculation factor: 1 DWELLS BOLD print indicates peak (busiest) period

Total People to Total Vehicles ratio (all time periods and directions): 2.58

		ARRIVALS		1	DEPARTURES			TOTALS	
	No.	Ave.	Trip	No.	Ave.	Trip	No.	Ave.	Trip
Time Range	Days	DWELLS	Rate	Days	DWELLS	Rate	Days	DWELLS	Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	7	33	0.060	7	33	0.138	7	33	0.198
08:00 - 09:00	7	33	0.142	7	33	0.250	7	33	0.392
09:00 - 10:00	7	33	0.216	7	33	0.259	7	33	0.475
10:00 - 11:00	7	33	0.151	7	33	0.185	7	33	0.336
11:00 - 12:00	7	33	0.155	7	33	0.125	7	33	0.280
12:00 - 13:00	7	33	0.190	7	33	0.164	7	33	0.354
13:00 - 14:00	7	33	0.151	7	33	0.147	7	33	0.298
14:00 - 15:00	7	33	0.203	7	33	0.172	7	33	0.375
15:00 - 16:00	7	33	0.211	7	33	0.203	7	33	0.414
16:00 - 17:00	7	33	0.164	7	33	0.164	7	33	0.328
17:00 - 18:00	7	33	0.276	7	33	0.181	7	33	0.457
18:00 - 19:00	7	33	0.147	7	33	0.125	7	33	0.272
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			2.066			2.113			4.179

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

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Parameter summary

Trip rate parameter range selected: 14 - 54 (units:)
Survey date date range: 01/01/03 - 22/10/21

Number of weekdays (Monday-Friday): 7
Number of Saturdays: 0
Number of Sundays: 0
Surveys automatically removed from selection: 1
Surveys manually removed from selection: 0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/B - AFFORDABLE/LOCAL AUTHORITY HOUSES

MULTI-MODAL CYCLISTS
Calculation factor: 1 DWELLS
BOLD print indicates peak (busiest) period

		ARRIVALS		l	DEPARTURES			TOTALS	
	No.	Ave.	Trip	No.	Ave.	Trip	No.	Ave.	Trip
Time Range	Days	DWELLS	Rate	Days	DWELLS	Rate	Days	DWELLS	Rate
00:00 - 01:00	·								
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	7	33	0.017	7	33	0.017	7	33	0.034
08:00 - 09:00	7	33	0.004	7	33	0.022	7	33	0.026
09:00 - 10:00	7	33	0.013	7	33	0.026	7	33	0.039
10:00 - 11:00	7	33	0.013	7	33	0.000	7	33	0.013
11:00 - 12:00	7	33	0.009	7	33	0.013	7	33	0.022
12:00 - 13:00	7	33	0.009	7	33	0.004	7	33	0.013
13:00 - 14:00	7	33	0.004	7	33	0.004	7	33	0.008
14:00 - 15:00	7	33	0.009	7	33	0.004	7	33	0.013
15:00 - 16:00	7	33	0.039	7	33	0.009	7	33	0.048
16:00 - 17:00	7	33	0.026	7	33	0.034	7	33	0.060
17:00 - 18:00	7	33	0.039	7	33	0.026	7	33	0.065
18:00 - 19:00	7	33	0.013	7	33	0.017	7	33	0.030
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00					•				
Total Rates:			0.195			0.176			0.371

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/B - AFFORDABLE/LOCAL AUTHORITY HOUSES

MULTI-MODAL PEDESTRIANS Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

		ARRIVALS		l	DEPARTURES	3		TOTALS	
	No.	Ave.	Trip	No.	Ave.	Trip	No.	Ave.	Trip
Time Range	Days	DWELLS	Rate	Days	DWELLS	Rate	Days	DWELLS	Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	7	33	0.030	7	33	0.073	7	33	0.103
08:00 - 09:00	7	33	0.099	7	33	0.513	7	33	0.612
09:00 - 10:00	7	33	0.177	7	33	0.155	7	33	0.332
10:00 - 11:00	7	33	0.129	7	33	0.190	7	33	0.319
11:00 - 12:00	7	33	0.108	7	33	0.142	7	33	0.250
12:00 - 13:00	7	33	0.181	7	33	0.151	7	33	0.332
13:00 - 14:00	7	33	0.116	7	33	0.095	7	33	0.211
14:00 - 15:00	7	33	0.177	7	33	0.172	7	33	0.349
15:00 - 16:00	7	33	0.427	7	33	0.254	7	33	0.681
16:00 - 17:00	7	33	0.194	7	33	0.116	7	33	0.310
17:00 - 18:00	7	33	0.267	7	33	0.220	7	33	0.487
18:00 - 19:00	7	33	0.164	7	33	0.147	7	33	0.311
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			2.069			2.228			4.297

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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TRIP RATE for Land Use 03 - RESIDENTIAL/B - AFFORDABLE/LOCAL AUTHORITY HOUSES

MULTI-MODAL PUBLIC TRANSPORT USERS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

		ARRIVALS			DEPARTURES	3		TOTALS	
	No.	Ave.	Trip	No.	Ave.	Trip	No.	Ave.	Trip
Time Range	Days	DWELLS	Rate	Days	DWELLS	Rate	Days	DWELLS	Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	7	33	0.000	7	33	0.017	7	33	0.017
08:00 - 09:00	7	33	0.000	7	33	0.091	7	33	0.091
09:00 - 10:00	7	33	0.009	7	33	0.034	7	33	0.043
10:00 - 11:00	7	33	0.004	7	33	0.000	7	33	0.004
11:00 - 12:00	7	33	0.013	7	33	0.013	7	33	0.026
12:00 - 13:00	7	33	0.022	7	33	0.013	7	33	0.035
13:00 - 14:00	7	33	0.030	7	33	0.013	7	33	0.043
14:00 - 15:00	7	33	0.030	7	33	0.017	7	33	0.047
15:00 - 16:00	7	33	0.069	7	33	0.013	7	33	0.082
16:00 - 17:00	7	33	0.013	7	33	0.013	7	33	0.026
17:00 - 18:00	7	33	0.030	7	33	0.004	7	33	0.034
18:00 - 19:00	7	33	0.013	7	33	0.000	7	33	0.013
19:00 - 20:00									
20:00 - 21:00					·		·		
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00					·		·		
Total Rates:			0.233			0.228			0.461

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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Bridgemont, Whaley Bridge

Preliminary Ecological Appraisal Report

V2





Title: Bridgemont, Whaley Bridge

Preliminary Ecological Appraisal Report V2

Client: Treville Properties

Date: February 2023

Status	Date	Prepared by	Reviewed by	Approved by
V1	30/01/23	Rowena Tylden-Pattenson Ecologist	Laura Kershaw Ecologist	
V2	09/02/23	Rowena Tylden-Pattenson Ecologist		

NLG Ecology Ltd has prepared this report for the sole use of the client, showing reasonable skill and care, for the intended purposes as stated in the agreement under which this work was completed. The report may not be relied upon by any other party without the agreement of the client and NLG Ecology Ltd. No other warranty, expressed or implied, is made as to the professional advice included in this report.

Data supplied by the client or from other sources have been used - it has been assumed that the information is correct. No responsibility can be accepted by NLG for inaccuracies in the data supplied by any other party. The conclusions and recommendations in this report are based on the assumption that all relevant information has been supplied by those bodies from whom it was requested.

Where field investigations have been carried out, these have been restricted to a level of detail required to achieve the stated objectives of the work. This work has been undertaken in accordance with the quality management system of NLG Ecology Ltd. No part of this report may be copied or duplicated without the express permission of NLG Ecology Ltd and the party for whom it was prepared.

SUMMARY

NLG Ecology Ltd (NLG) was commissioned by Treville Properties to undertake a Preliminary Ecological Appraisal of a site subject to housing development proposals and located at Bridgemont, Whaley Bridge. The survey area is centred at OS Grid Reference SK 01203 82398, with its nearest postcode being SK23 7GW; the site location, along with any recorded habitats and features of ecological interest are shown on Figure 1, Appendix 1 and in Photographs 1 to 12 in Appendix 3.

The appraisal was required to inform proposals to develop the parcel of land for a new housing development.

The Preliminary Ecological Appraisal has mainly comprised of an open-source desk study to 2km radius, a UK Habitat Survey and an evaluation of the key ecological constraints to the project.

The appraisal, including the Extended Phase 1 Habitat Survey completed on 25th January 2023, has been undertaken by Rowena Tylden-Pattenson (Ecologist, QCIEEM, Natural England Class Level 1 survey licence holder for bats 2021-54039-CLS-CLS, Natural England Barn Owl Survey Licence CL29/00585) and Melissa Emblin-Simpson (Assistant Ecologist, QCIEEM).

Key constraints in respect to protected species are as follows:

- Roosting bats All trees were assessed to have negligible bat roosting potential, and can be
 de-vegetated adhering to nesting bird advice.
- Mammals (badger, fox and rabbit) Avoidance of any mammal holes is recommended.
- Nesting birds All de-vegetation works between March to August inclusive will need to be checked by an ecologist no more than 48 hours prior to removal/management.
- Reptiles A precautionary working methods statement should be followed for any works.
- Amphibians (including great crested newt) It is recommended that the three ponds within 250m of the site are assessed via Habitat Suitability Index Assessment and eDNA assessment.
 A precautionary working methods statement should be followed for any works.
- Small mammals- Scrub habitats should be carefully cut back in stages to allow hedgehogs and other small mammals to vacate the area safely.

All recommendations are located in Section 4.2.

The data contained within this report are considered to be valid for a period of 18 months from the date of the last survey on site (i.e. until 25/07/2024).

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1 INTRODUCTION

1.1 Background

- 1.1.1 NLG Ecology Ltd (NLG) was commissioned by Treville Properties to undertake a Preliminary Ecological Appraisal of a site subject to housing development proposals and located at Bridgemont, Whaley Bridge. The survey area is centred at OS Grid Reference SK 01203 82398, with its nearest postcode being SK23 7GW; the site location, along with any recorded habitats and features of ecological interest are shown on Figure 1, Appendix 1 and in Photographs 1 to 12 in Appendix 3.
- 1.1.2 The appraisal was required to inform proposals to develop the parcel of land for a new housing development. In general, and facilitated by the Preliminary Ecological Appraisal report, for all projects that may affect any plants and/or animals, biodiversity risks and opportunities must be identified and managed in accordance with the 'Biodiversity Mitigation Hierarchy'. This comprises sequential steps to avoid, minimise, rehabilitate/restore and offset any negative impacts on biodiversity, aiming ultimately to achieve a net gain in biodiversity.
- 1.1.3 The Preliminary Ecological Appraisal has mainly comprised of an open-source desk study to 2km radius, an Extended Phase 1 Habitat Survey and an evaluation of the key ecological constraints to the project. In order to identify ecological opportunities and constraints in respect of the proposals, this report collates the data gathered and seeks to fulfil the following objectives:
 - To establish an ecological baseline for the site;
 - To assess the potential for, or to confirm actual presence of, protected and notable species; and
 - To make recommendations for further appraisal and ecological survey where required.
- 1.1.4 The appraisal, including the Extended Phase 1 Habitat Survey completed on 25th January 2023, has been undertaken by Rowena Tylden-Pattenson (Ecologist, QCIEEM, Natural England Class Level 1 survey licence holder for bats 2021-54039-CLS-CLS, Natural England Barn Owl Survey Licence CL29/00585) and Melissa Emblin-Simpson (Assistant Ecologist, QCIEEM).

1.2 Relevant Legislation

- 1.2.1 Legislation that is applicable to the site is listed below, which covers the UK and Wales only. For a more definitive statement of law it is recommended that the full legislative acts are sighted.
 - The Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations'): These Regulations consolidate and update the Conservation (Natural Habitats, &c.) Regulations 2010 and 1994 ("the 2010 Regulations" and "the 1994 Regulations"). The Habitats Regulations, which are made under section 2(2) of the European Communities Act 1972, are the principal means by which Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the "Habitats Directive") is transposed for England and Wales and territorial seas.

- The Wildlife and Countryside Act 1981 (as amended) gives general protection measures for wildlife and special measures for species included on Schedules of the Act. Schedule 1 lists birds that are afforded special protection, Schedules 4-6 protects various wild animal species from injury, killing or disturbance, and Schedule 8 confers protection to certain plant species. The statutory designation of Sites of Special Scientific Interest (SSSI) is the main site protection measure in the UK established under the WCA
- The Countryside and Rights of Way Act (CROW Act) 2000 amended the Wildlife and Countryside Act 1981 to also make it an offence to intentionally or recklessly damage, destroy or obstruct a place that a species, listed on Schedules of the Wildlife and Countryside Act, uses for shelter or protection. The repealed Section 74 of the CROW Act listed habitats and species important to biological diversity in England, in accordance with the 1992 UN Convention on Biodiversity (Habitats and Species Action Plans under The UK Biodiversity Action Plan is the means by which the government complied with it's duty under Section 74).
- Section 41 of the Natural Environment and Rural Communities Act (2006) replaces Section 74 of the Countryside and Rights of Way Act, 2000 and refers to the list of organisms and habitats of principal importance published under the repealed Section 74 of the CROW Act 2000. The Secretary of State must take such steps to further the conservation of the living organisms and types of habitat included in the list and promote the taking by others of such steps.
- Hedgerow Regulations (1997) restrict the removal or part removal of hedgerows which
 are over 20m in length. Removal includes digging, replanting elsewhere or destroying a
 hedgerow.
- The Environment Act 2021: Is the most recent legislation for provision about targets, plans and policies for improving the natural environment; for statements and reports about environmental protection; for the Office for Environmental Protection; about nature and biodiversity; for conservation covenants. Part 6 of the Act makes provision about biodiversity net gain in relation to development to be either a planning condition for smaller projects or development consent for nationally significant infrastructure projects.
- The National Planning Policy Framework (NPPF) (Department of Housing Communities and Local Government, 2019): sets out the UK Government's planning policies for England and provides guidance on how these policies are expected to be applied. The NPPF includes a chapter on biodiversity, Chapter 15 Conserving and Enhancing the Natural Environment. In addition to being concerned with the protection of statutorily designated sites, the Chapter outlines ways in which the planning system is required to contribute to and enhance the natural and local environment and sets out guidance for local authorities in respect of the consideration of biodiversity and green infrastructure. The NPPF is a material planning consideration.
- The 'UK Post-2010 Biodiversity Framework': succeeded the UK Biodiversity Action Plan (UKBAP) in July 2012. The post-2010 framework is underpinned by the biodiversity and environment strategies of the four countries of the UK and sets out their common purpose and shared priorities. The UKBAP list of priority species remains as a reference source and has been used to help draw up statutory lists of priorities.
- Biodiversity 2020: is a strategy for England's wildlife and ecosystem services'. Published
 in 2011, it is the most recent biodiversity strategy for England, and has as its mission to
 halt overall biodiversity loss, support healthy well-functioning ecosystems, and establish
 coherent ecological networks, with more and better places for nature for the benefit of
 wildlife and people.

- **Bats**. Receive full protection under the Wildlife and Countryside Act 1981 (as amended). They are also protected under the Conservation of Habitats and Species Regulations 2017. The legislation makes it an offence to intentionally kill, injure or take a wild bat uses for shelter or protection whether present or not, and to intentionally disturb any wild bat while it is occupying a structure or place that it uses for shelter or protection.
- The Protection of Badgers Act (1992) relates to protecting badgers from activities that result in disturbing or interfering with a badger's sett.
- **Nesting Birds.** Under the Wildlife and Countryside Act 1982 (as amended) all wild birds, their nests and eggs are protected by law and it is an offence to intentionally kill, injure and wild bird, to intentionally take, damage or destroy the nest of any wild bird while it is in use or being built, and to intentionally take or destroy the egg of any wild bird.
- Great Crested Newt is a European Protected Species (EPS), receiving full protection
 under the 1981 Wildlife and Countryside Act (as amended), the 2017 Conservation and
 Species Regulations and the Countryside and Rights of Way Act (CROW) 2000.
- Reptiles. All UK reptile species are protected under the Wildlife and Countryside Act 1981 (as amended), making it illegal to intentionally kill or injure a common reptile. Rare reptiles (smooth snake and sand lizard) are also protected under the Conservation of Habitats and Species Regulations 2017. This makes it an offence to deliberately injure, kill, capture or disturb a rare reptile, or to damage or obstruct any place used by the species for shelter or protection.
- Hedgehogs are protected in England under Schedule 6 of the Wildlife and Countryside
 Act (1981) and are also listed under Section 41 of the Natural Environment and Rural
 Communities (NERC) Act (2006). This lists English species that were formerly identified
 as requiring action under the UK Biodiversity Action Plans and which continue to be
 regarded as conservation priorities under many Local Biodiversity Action Plans (LBAP)
 and the current UK Post-2010 Biodiversity Framework.
- Rabbit (and fox). The Wild Mammals Protection Act (1996) makes it an offence to crush or asphyxiate any wild mammal. This may apply during site clearance works, particularly where burrowing mammals such as rabbit and fox are present, as such animals could be crushed or asphyxiated in their burrows by heavy machinery.

2 METHODOLOGY

2.1 Project and Survey Scope

- 2.1.1 The scope of the proposed works involves the development of 42 properties with associated infrastructure and gardens on the Bridgemont site.
- 2.1.2 The aim of the Preliminary Ecological Appraisal, including the desk study, is to inform the scheme in recording the ecological baseline for the site and/or identifying key features. Where possible, the ecological value of the features present on site is assessed in accordance with guidelines issued by the Chartered Institute of Ecology and Environmental Management (CIEEM 2018), although the values are usually provisional upon data obtained from further survey effort where required.

2.2 Desk Study

- 2.2.1 A desk study provides background information on the ecological context of a site and complements data collected in the field. The search area extended up to 2km and incorporated the following resources:
 - Defra's Multi-Agency Geographic Information for the Countryside (MAGIC) www.magic.gov.uk was searched for European and National Statutory designated sites, including Special Protected Areas (SPAs), Special Areas of Conservation (SACs), Sites of Special Scientific Interest (SSSI) and Local Nature Reserves (LNRs). The site was also searched for records of nearby granted European Protected Species (EPS) mitigation licences;
 - MAGIC also provided a basis for highlighting the location of nearby UK BAP (Biodiversity Action Plan – now covered by the UK Post-2010 Biodiversity Framework) priority habitats;
 - The National Biodiversity Network (NBN) Atlas (https://records.nbnatlas.org) was consulted with reference to relevant and notable species records on, or within 1km of, the site; and
 - Aerial imagery from Google Maps (www.google.co.uk/maps), and Ordnance Survey mapping from Bing (https://www.bing.com/maps/), was reviewed to help determine terrestrial and hydrological connectivity with the wider landscape. This particularly related to the presence of ponds within 250m of the proposal site. Where potential water bodies are identified, further ground investigation of their presence and suitability for great crested newt (*Triturus cristatus*) is recommended.

2.3 UK Habitat Survey

- 2.3.1 The UK Habitat Survey broadly followed the standard methodology as detailed in Butcher et al. (2020) *The UK Habitat Classification User Manual Version 1.1.* This involved mapping and describing the broad habitats and compiling a general plant species list to reflect the floristic assemblage of each habitat type. All botanical names follow the nomenclature of Stace (2010).
- 2.3.2 In accordance with the CIEEM (2017) guidelines for Preliminary Ecological Appraisal, faunal potential through, and adjacent to, the survey area was also surveyed. The level of scoping does not necessarily constitute full survey effort, although reasonable effort is made to provide informed conclusions for the potential requirement of further survey.

2.3.3 Target notes (TN) were used to illustrate key features of interest (i.e. over mature trees / dead standing wood) or to draw attention to areas considered too small to map or for the purpose of highlighting the location of an invasive plant species, Appendix 2.

2.4 Tree Inspection for Bat Roosting Potential

- 2.4.1 The tree inspection adhered to guidance within Bat Surveys for Professional Ecologists: Good Practice Guidelines (Collins 2016) and the Bat Mitigation Guidelines (Mitchell-Jones 2004). The survey involved a detailed inspection of the tree. Equipment used to support the assessment included a high powered torch, with binoculars and ladders on hand if required.
- 2.4.2 Throughout the inspection, evidence of use by bats was searched for in addition to suitable potential access and roosting points. Such features can include: woodpecker holes, rot holes, splits, cavities, bat boxes and densely-plated ivy growth.
- 2.4.3 Tree inspections aim to assign a bat roosting value to a tree, as described in Table 2.2 and adapted from Collins (2016).
- 2.4.4 The classification of the tree corresponds to the level of further survey effort required i.e. the number of recommended emergence/re-entry surveys for bats, in accordance with best practice guidance (Collins, 2016). The levels are as follows:
 - Negligible: no survey requirement;
 - Low: soft-felling under ecological supervision;
 - Moderate: two surveys required comprising one at dawn and one at dusk; if bats are seen to emerge or re-enter, then one further confirmation visit is required; and
 - High or confirmed day roost: three surveys, including at least one at dawn and one at dusk required.

Table 2.2: Visual Assessment Criteria for Trees

Suitability	Description of Roosting Habitats	Commuting and Foraging Habitats
Negligible	Negligible habitat features on site likely to be used by roosting bats.	Negligible habitat features on site likely to be used by commuting or foraging bats.
Low	A tree of sufficient size and age to contain potential roosting features (PRF's) but with none seen from the ground of features seen with only very limited roosting potential.	Habitat that could be used by small numbers of commuting bats such as a gappy hedgerow or unvegetated stream, but isolated, i.e. not very well connected to the surrounding landscape by other habitat.
		Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.
Moderate	A tree with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status.	Continuous habitat connected to the wider landscape that could be used by bats for commuting such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees. Scrub, grassland or water.
High	A tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.	Continuous high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by commuting bats such as river valleys, streams, hedgerows, lines of trees and woodland edge.
		High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, treelined watercourses and grazed parkland.
		Site is close to known roosts.

2.5 Constraints

- 2.5.1 The ecology survey was undertaken outside of the main plant flowering season; therefore, the plant species recorded are not considered to represent a comprehensive list of the botanical species present on site.
- 2.5.2 Whilst desk study records can help to inform and complement survey effort, they should not be treated as a comprehensive list of species present within the search area. Many species are under-recorded and a lack of records can reflect a lack of survey effort in certain areas rather than confirming absence of a species.

3 FINDINGS

3.1 Desk Study

Designations and Notable Habitats

- 3.1.1 The site is located in Bridgemont, to the north of Whaley Bridge town, Derbyshire, nearest postcode SK23 7PB. Within the immediate vicinity is the railway line to the west and residential housing to the east; further afield, deciduous woodland and semi-improved extends to the east, with the River Goyt flowing from north to south approximately 330 m away.
- 3.1.2 The site falls within the Impact Risk Zone (IRZ) for several designated sites, most notably:
 - Toddbrook Reservoir Site of Special Scientific Interest (SSSI), located approximately 1.3 km south west;
 - Peak District National Park, Goyt Valley SSSI, South Pennine Moors Special Area of Conservation (SAC) and Peak District Moors (South Pennine Moors Phase 1) Special Protection Area (SPA), approximately 4.6 km south;
 - Combs Reservoir SSSI, approximately 3.3 km south east;
 - Dark Peak SSSI, Kinder Scout National Nature Reserve (NNR) approximately 5.6 km north east.
- 3.1.3 The planning proposal for Bridgemont does not fall under any of the categories listed on the IRZ detail. Therefore, it is not required for the LPA to consult Natural England on the proposal to build 42 residential properties on the site.
- 3.1.4 Brookfield Pond Local Nature Reserve (LNR) is also situated approximately 1.2 km south. Should the proposed works fall within any of the identified risks to these designated sites, the Local Planning Authority should consult Natural England with regards to the Impact Risk Zones.
- 3.1.5 Priority habitats (in accordance with the UK Post-2010 Biodiversity Framework, formerly UK BAP) recorded by MAGIC as being within 1 km of the site include areas of deciduous woodland in all directions, the closest being directly adjacent to the site on its eastern border. Ancient woodland is present to the south, approximately 280 m and 800 m away. Should the deciduous woodland be anticipated to be affected by the proposed works, control measures should be put in place to limit any negative impacts to these habitats.

Faunal Records

- 3.1.6 A search using MAGIC returned no records of granted European Protected Species (EPS) mitigation licences for great crested newts (Triturus cristatus) (GCN) within 1 km of the site. With regards to nearby potential amphibian breeding habitat, a review of OS mapping and aerial photography indicates the presence of one pond within 250 m of the site, approximately 70 m west.
- 3.1.7 Within 2 km of the site, four records for granted EPS mitigation licences or bats were returned. These are listed as follows:

- A licence (ref no. EPSM2009-1144) issued from 07/09/2009 to 01/09/2010 allowing for the destruction of a resting place for common pipistrelles (*Pipistrellus pipistrellus*) at a site approximately 1.1 km north;
- A licence (ref no. EPSM2012-4506) issued from 02/07/2012 to 30/10/2013 allowing for the destruction of a resting place for common pipistrelle and soprano pipistrelle (*Pipistrellus pygmaeus*) bats approximately 1.1 km east;
- A licence (ref no. 2017-32521-EPS-MIT) issued from 01/12/2017 to 31/01/2019 allowing for the destruction of a resting place for common pipistrelle, soprano pipistrelle, and brown long-eared (*Plecotus auritus*) bats approximately 1.8 km south east;
- A licence (ref no. EPSM2012-5153) issued from 15/11/2012 to 30/09/2013 allowing for the destruction of a resting place for common pipistrelle and soprano pipistrelle bats approximately 1.7 km south.
- 3.1.8 The National Biodiversity Network (NBN) Atlas (https://nbnatlas.rg/ accessed 23/01/2023) was used to search for protected, notable or invasive species records within 1 km of the survey area within the last 10 years. These records are summarised as follows:
 - Birds (Schedule 1 species as listed within the Wildlife & Countryside Act 1981 and birds of conservation concern red list): two kingfisher (Alcedo atthis), six swift (Apus apus), one house martin (Delichon urbicum), one herring gull (Larus argentatus), one starling (Sturnus vulgaris), one redwing (Turdus iliacus), and one barn owl (Tyto alba);
 - Mammals (European Protected Species and Schedule 5 species as listed within the Wildlife & Countryside Act 1981): eight European hedgehog (Erinaceus europaeus), one Eurasian otter (Lutra lutra), and two Daubenton's bat (Myotis daubentonii);
 - Invasive Species (Schedule 9 species as listed within the Wildlife & Countryside Act 1981): four giant hogweed (*Heracleum mantegazzianum*), and one Himalayan balsam (*Impatiens glandulifera*); and,
 - **Protected Plants:** two English bluebell (*Hyacinthoides non-scripta*).
- 3.1.9 No records of notable amphibians or reptiles were returned during the search.
- 3.1.10 It should be noted that desk study data do not represent a comprehensive list of the species present or absent within a search area and, if that habitat is suitable, a species should not be assumed to be absent based on a lack of records.

3.2 UK Habitat Survey

3.2.1 The habitat survey findings are illustrated on Figures 1-2 (Appendix 1) and are described further below, with target notes (TN) tabulated in Appendix 2 and cross referenced within the text below. Photographic plates are presented in Appendix 3.

Habitats

Grassland

g3c - Other neutral grassland

- 3.2.2 The majority of the site is dominated by short sward perennial rye-grass (*Lolium perenne*), with occasional dandelion (*Taraxacum* sp.). Much of this area has been poached down to mud (secondary code 75- bare ground, photograph 5) by domestic poultry kept on the eastern edge of the site, with associated pens (TN3) and sheds also within this area (u1b5 building).
- 3.2.3 A small area of ballast debris is present underneath a shed at the edge of the site, with a pile of felt adjacent that may be suitable for reptiles.
- 3.2.4 Part of this habitat is currently being utilized as a Murphys compound (photograph 4).
- 3.2.5 Multiple wet areas are present within this habitat, including a small pool of water (TN4, photograph 12) approximately 1m in width, with high silt volumes at the time of survey.
- 3.2.6 Additional features within this habitat included an abandoned car, piles of timber, a large patch of bare ground that may have been previously burnt (photograph 11), now with a large pile of rubble and debris present in the centre (photograph 7), and pallets and fiberglass stacked against a fence (photograph 6).
 - g3c8 Holcus-Juncus neutral grassland
- 3.2.7 Damp neutral grassland dominated by soft rush (*Juncus effusus*) is present in the south of the site, with hogweed (*Heracleum sphondylium*), dock (*Rumex* sp.), bramble (*Rubus fruitcosus*) and cocksfoot (*Dactylis glomerata*) grass also present as tall ruderal vegetation (secondary code 16).

Scrub

h3- Dense scrub

3.2.8 Dense bramble scrub is present at the north (photograph 3) and south (photograph 8) of the site, with additional rosebay willowherb (*Chamerion angustifolium*), bracken (*Pteridium aquilinum*), hard fern (*Blechnum spicant*) and immature willow (*Salix* sp.) trees also present in the northern section of scrub. The southern section is primarily bramble with tall rosebay willowherb (photograph 9).

Urban & linear features

u1 Built-up areas and gardens

- 3.2.9 Planted ornamental species (TN2, photograph 1) are present either side of the current paved access track (u1e Built linear feature) to the land parcel, with species including ivy (*Hedera helix*), dock, apple (*Prunus* sp.), bramble and rosebay willowherb.
 - u1b Developed land, sealed surface
- 3.2.10 A disused car park is present as part of the site at SK 01268 82394. Bramble overhangs the stone wall at the back.

h2b Other hedgerow

3.2.11 A Leyland cypress (*Cupressus* × *leylandii*) hedgerow is present at SK 01214 82447, along the boundary of the site.

Faunal Species

Roosting bats

- 3.2.12 A Preliminary Ground Level Roost Assessment (PGLRA) was carried out for the trees within the survey area, in accordance with best practice guidance (Collins, 2016). All trees were assessed to offer negligible potential for roosting bats based on their age and/or a lack of suitable roosting features.
- 3.2.13 The buildings on site (primarily wooden sheds and animal hutches) were all assessed to offer **negligible** potential for roosting bats.

Badger, rabbit and fox

3.2.14 A fox skull (TN1, photograph 2) was found hanging on a branch at approximately SK 01198 82475. A fox trap (TN4) is also present on the site at SK 01214 82305. The site provides suitable habitats for these species. Therefore as a precaution, recommendations for badger, rabbit and fox are included within the Conclusion and Recommendations section, below.

Breeding birds

3.2.15 During the survey, the following birds were recorded within the site: goldfinch (*Carduelis carduelis*), robin (*Erithacus rubecula*), blackbird (*Turdus merula*) and dunnock (*Prunella modularis*). Opportunities for nesting birds are prevalent throughout the vegetation within the survey area, including where trees, scrub, buildings, and tall ruderal vegetation exist.

Other

- 3.2.16 The scrub habitats on site offer refuge opportunities to small mammals, such as hedgehogs (*Erinaceus europaeus*).
- 3.2.17 Three ponds were recorded within 250m of the site (Figure 2, Appendix 1). These have not been surveyed in relation to the proposed development. Refuge opportunities for amphibians, including great crested newts, exist within the tall ruderal on site, as well as ballast piles, timber and debris (TN5, photograph 10). These habitats may also be of value to common reptile species.
- 3.2.18 Common amphibian species are likely to be present on site, such as toad (*Bufo bufo*) and smooth newt (*Lissotriton vulgaris*).

4 CONCLUSIONS AND RECOMMENDATIONS

4.1 Evaluation of Ecological Features and Identification of Potential Impacts

- 4.1.1 Deciduous woodland priority habitat is present adjacent to the site.
- 4.1.2 The planning proposal for Bridgemont does not fall under any of the categories listed on the IRZ detail. Therefore, it is not required for the LPA to consult Natural England on the proposal to build 42 residential properties on the site.
- 4.1.3 The habitats recorded on site within the footprint of the development proposal will provide valuable places of refuge, and shelter and foraging opportunities to small mammals, reptiles, amphibians and birds. Any trees should be retained and incorporated into the landscaping design if possible; any necessary de-vegetation should be undertaken in accordance with the advice given for nesting birds and small mammals. It is generally recommended that the amount of de-vegetation is restricted to the minimum required to facilitate the proposals and that any bounding vegetation or habitats remain protected and unaffected by the

4.2 Recommendations for Further Surveys, General Mitigation and Possible Enhancements

4.2.1 The survey has confirmed the potential for and/or actual presence of roosting bats, badger, rabbit and fox, breeding birds, reptiles, amphibians and small mammals. The following is therefore recommended in respect of these species:

Roosting Bats

4.2.2 Trees holding **negligible** bat roosting potential within the site can be de-vegetated adhering to the nesting bird advice.

Badger, fox and rabbit

- 4.2.3 As a precaution, if any holes suspected to be badger sett entrances are unexpectedly discovered during any future works, work in that area must cease and an ecologist must be contacted for advice on how to proceed; a site visit may be required to assess the hole(s). Badger sett entrances are typically in the shape of a capital 'D' with the flat side down, measuring on average 25-35cm in width and maintaining a wide tunnel within. Fresh spoil is often present outside regularly used entrances.
- 4.2.4 With regards to rabbit and fox, these species are protected under the Wild Mammals Protection Act (1996), including from asphyxiation and crushing. It is recommended that if any mammal holes are identified then these holes should be avoided this includes trampling, obstruction, machinery and temporary storage of materials. If avoidance is not possible, an ecologist should be contacted so that the species to which the hole belongs to can be identified. This information will then be used to provide further advice (a site visit may be required to assess the hole(s)). See Natural England Technical Information Note 003 (Appendix 5) for guidance regarding rabbit holes if they absolutely cannot be avoided during works.

Breeding birds

4.2.5 Nesting opportunities for a range of common bird species exist across the site, including within the proposed development area in scrub, tall ruderal, in buildings and within trees.

4.2.6 It is recommended that all de-vegetation works are undertaken outside the main nesting bird season (March to August inclusive), and maintained occasionally to deter any uptake prior to the commencement of works. If this timing is not possible and dense scrub or mature trees need to be removed during the main nesting bird season, or bridges with nesting bird potential are being affected by works, checks of the affected areas will need to be undertaken by an ecologist no more than 48 hours prior to removal/management. If any active nests are identified, a buffer of at least 5m in all directions would be required, to protect the nest from disturbance until any chicks have fledged.

Reptile & Amphibian species

- 4.2.7 The site is considered suitable for commonly occurring reptile species and is relatively well-connected to further habitat corridors. The following precautionary working method statement should be followed when undertaking works:
 - Site clearance, in particular dense vegetation, scrub and rubble/debris piles must commence under the supervision of an ecologist;
 - Any areas of vegetation for which removal is required will first be strimmed (carefully, in
 phases and in accordance with the nesting bird recommendations below) to a height of
 no less than 150mm and left for 48 hours so that any animals within can disperse;
 - Careful removal of any potential refugia piles (e.g. brash piles, log piles and debris) will be undertaken by hand (still under the supervision of an ecologist) and in accordance with the nesting bird recommendations;
 - If any injured amphibians or reptiles are found during works on site, these will be carefully placed by the supervising ecologist into a clean bucket containing some vegetation and covered over in a quiet place away from the works until an ecologist has been able to contact a local vet or wildlife hospital; and
 - A copy of these measures must be kept on site and all contractors working on the site made aware of the possible presence of common reptile and amphibian species.
- 4.2.1 Three ponds are present within 250m of the survey site. These ponds have not been surveyed in regard to the proposed works. It is recommended that the three ponds are assessed via Habitat Suitability Index Assessment and eDNA assessment. If identified to be positive for great crested newt, a Great Crested Newt low-impact licence would be required for any works which require significant breaking of ground on site.
- 4.2.2 A precautionary working method statement has been provided below in regards to GCN:
 - Works should be carried out during the active period for amphibians (considered to be March to October) to minimise the potential for disturbing hibernating individuals and allow for natural dispersal.
 - All ground level vegetation clearance should be undertaken using hand tools only.
 Where possible, a staged cut will be undertaken, with an initial clearance of vegetation
 to 100 150mm to allow any amphibians to naturally disperse without risk of injury /
 death. Once the area has been checked, vegetation can be cleared to ground level. Any
 rock, log or suitable refuge piles shall be retained where possible if any clearance of
 suitable refugia is required, this will be done by hand by an ecologist.
 - In the unlikely event that a newt is found during the works, all works in the immediate
 area must cease and the newt be left in situ. A photograph can be taken, ideally with a
 car key or biro next to the animal for a sense of scale. The Project Ecologist should then
 be contacted and the photograph forwarded; if the newt is suspected to be GCN than

the ecologist may need to attend site and establish the best way forward. GCN ID is provided in Appendix 4.

Other

- 4.2.3 The scrub habitats present on site offer refuge opportunities to small mammals, such as hedgehog.
- 4.2.4 Any dense scrub on site, if removal is required, should be carefully cut back in stages by hand in accordance with previous recommendations, taking care to look for hedgehogs in particular. If any hedgehogs are found, these should be safely relocated to a nearby, suitably dense/well-vegetated area or brash pile that will remain undisturbed by the works.
- 4.2.5 There is potential for common amphibian species within the works area such as the common toad. If a common amphibian is found it should be moved to a place of safety (dense vegetation away from works traffic).

5 REFERENCES

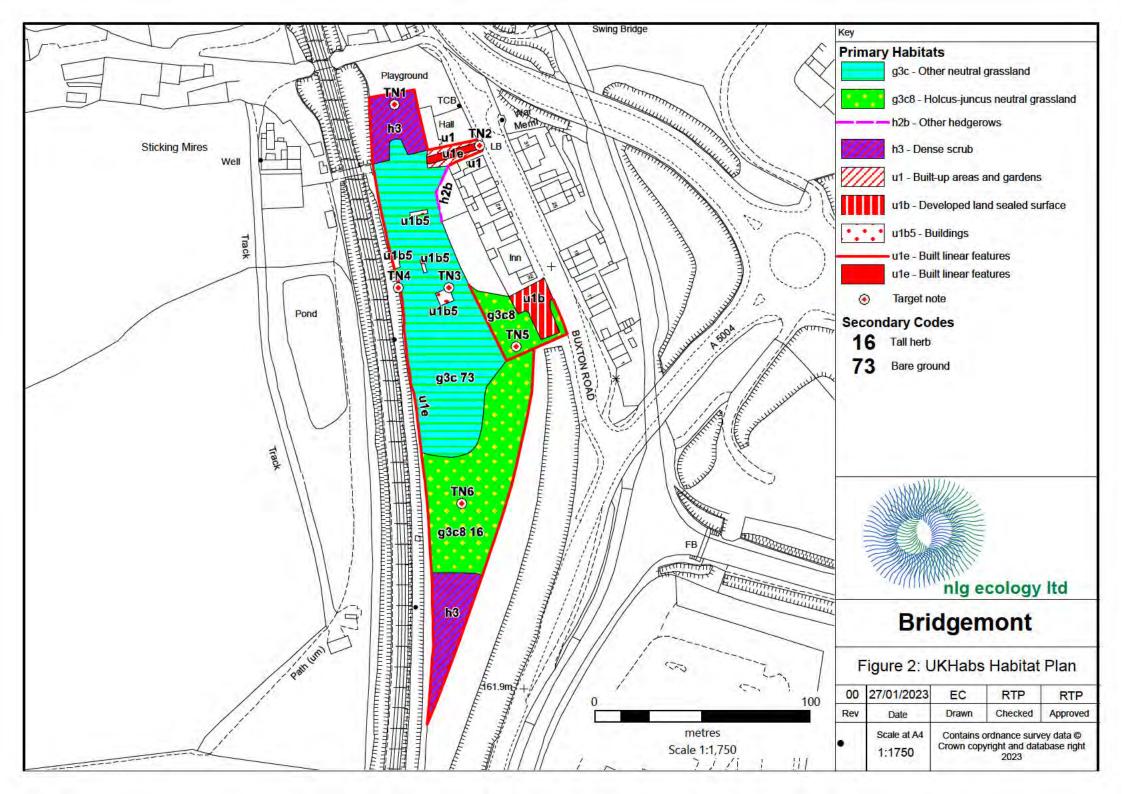
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APPENDIX 1: FIGURES

Figure 1: Location of Bridgemont (red polygon) and nearby priority habitats (green polygons) and ponds within 250m of the site.



Figure 2: UKHabs map of Bridgemont.



APPENDIX 2: TARGET NOTES

Target note (TN)	Description	
1	Fox skull on a branch at approximately SK 01198 82475.	
2	Planted borders along access route.	
3	Poultry pens and associated cages and hutches.	
4	Small body of silted water.	
5	Large pile of rubble present, suitable for amphibians and reptiles.	
6	Fox trap.	

APPENDIX 3: PHOTOGRAPHIC PLATES

Photograph 1. Current access track to site, with planted borders present to either side (TN2).

Photograph 2. Fox skull hanging on branch (TN1).





Photograph 3. Scrub present to north of site, with willow trees.

Photograph 4. Current Murphys compound present on site.



Photograph 5. Area of bare ground with poultry sheds and associated infrastructure (TN3).



Photograph 6. Piled wood and debris piles along fenceline.





Photograph 7. Rubble piles to east of site.



Photograph 9. Tall ruderal (rosebay willowherb) looking north from southern area of scrub.





Photograph 10. Tall ruderal scrub and ballast rubble, suitable for reptiles and amphibians (TN5).



Photograph 11. Area of burnt ground and rubble, may be suitable for amphibians or reptiles.



Photograph 12. Small silted waterbody on site.





APPENDIX 4: GREAT CRESTED NEWT IDENTIFICATION GUIDE

Physical description of great crested newt

Should a newt be found, a description and photographs of great crested newt are given below to aid identification. In the UK, great crested newts may grow up to 17cm long (body and tail). They are the largest species of newt found in Britain. Great crested newts have dark grey-brown backs and flanks, and are covered with darker coloured spots so that they appear almost black in colour. They also have fine white spots on their lower flanks, which are more obvious in breeding males. Their undersides are either yellow or orange-coloured and are covered in large black blotches. Males can be distinguished from females by the presence of a jagged crest that runs along their backs, dipping at the rear of the abdomen to a smoother-edged crest above and below the tail. They also have a silver-grey stripe that runs along the tail. The male's crest is more pronounced during the breeding season, and lies flat to the body when the newt is out of water. Females lack a crest, but have a yellow-orange stripe along the lower edge of their tails.



Male and female adult great crested newts



Underside of female great crested newt



Great crested newt (lower part of picture) with smooth newt (upper part of picture)



HBL ASSOCIATES FRA & DRAINAGE STRATEGY REVIEW

For

RESIDENTIAL DEVELOPMENT

LAND TO WEST OF BRIDGEMONT,

WHALEY BRIDGE, SK23 7PB

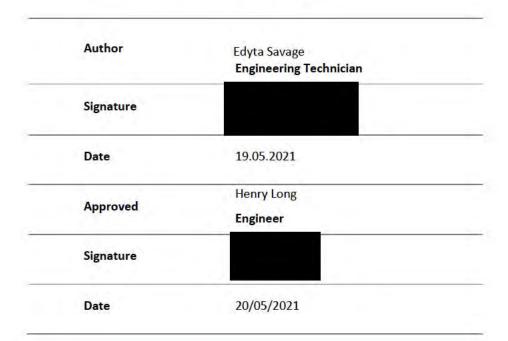
UNITED KINGDOM

On Behalf Of TREVILLE PROPERTIES LTD

HBL Ref: 9097-HBL-XX-XX-RP-D-0001

Document Control

Document reference: 9097-HBL-XX-XX-RP-D-0001



Rev	Date	Details	Prepared By	Reviewed By
01	19.05.2021	Information	ES	HL
02	07.12.2021	Information	ES	HL
03	27.01.2023	Appendix 9 added	ES	LM

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The information presented in this document and all conclusions drawn are based on statistical data and are for guidance purposes only. The report does not guarantee against flooding of the study site or elsewhere, nor of the absolute accuracy of the water levels, flow rates and associated probabilities.

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FRA & DRAINAGE STRATEGY

1 INTRODUCTION

Application Site Details

1.1. HBL Associates Ltd have been instructed to review/update previously submitted flood risk assessment and drainage statement prepared by Cole Easdon consultancy (CEC) in support of an outline planning application for housing development at Land to west of Bridgemont, Whaley Bridge, SK23 7PB.

1.2. Existing Site Details are summarised within Table 1 below.

Table 1 Site Information

SITE NAME	Land west to Bridgemont, Whaley Bridge
PROJECT DESCRIPTION	Housing Development - small scale major development 38 no residential units.
LOCATION	Land west to Bridgemont, Whaley Bridge, SK23 7PB
NGR (APPROXIMATE)	401209, 382381
APPLICATION SITE (HA) - RED BOUNDARY LINE	10,0041 sq m (1ha)
DEVELOPMENT TYPE	Greenfield
LOCAL PLANNING AUTHORITY	High Peak Borough Council
LOCAL LEAD FLOOD AUTHORITY	Derbyshire County Council Flood Risk Management Team, Scott Stone - Flood Risk Technician 01629538524, scott.stone@derbyshire.gov.uk flood.team@derbyshire.gov.uk
SEWERAGE UNDERTAKER IN THE AREA	United Utilities Group Plc.

- 1.3. Sources of flooding will be reviewed as part of this report for the proposed development in its current context.
- 1.4. This document is to be read in conjunction with all associated drawings, supported reports and documentation.
- 1.5. The report follows advice contained in the Department for Communities and Local Government's National Planning Policy Framework (NPPF) and Planning Practice Guidance, which provides advice to planning authorities, developers, the public and Environment Agency (EA) on development and flood risk.
- 1.6. In the preparation of this report, HBL Limited has followed accepted procedure, however, given the residual risk associated with any predictions and variability of date which can be experienced in flood conditions, we take no liability for and give no warranty against actual flooding of any property (client's or third party) or the consequence of the flooding in relation to the performance of this service. This report has been prepared as part of an outline planning application only and should not be relied upon or used for any other purpose



2 SITE LOCATION AND TOPOGRAPHY

- 2.1. The site is located west of Bridgemont, Whaley Bridge, High Peak, Derbyshire, SK23 7PB. The National Grid Reference for the site is 401209, 382381
- 2.2. The location of the site is indicated in Figure 2.1 below.

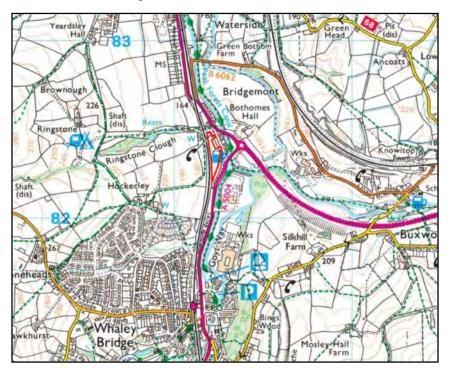


Figure 2.1 Site Location Plan

2.3. The site is currently an agricultural field with thick vegetation, see google map satellite imagery in Figure 2.2



Figure 2.2 Google maps satellite imagery.



- 2.4. The application site (approximately 1ha) is located ~0.9km to the north of the centre of Whaley Bridge.
- 2.5. The main access is via a driveway located in the north of the site between No52. Bridgemont and the Bridgemont Nursery school. Access to part of the site is also from Bridgemont to the south of No.32.
- 2.6. The site is an elongated, irregularly shaped undeveloped grassland located between railway lines to the west, a children's play area and a minor road Bridgemont to the north, residential dwelling, and nursery school to the east and area of woodland to the south.
- 2.7. Ground levels are generally rising from Bridgemont, the eastern areas of the site at a level of ~165m above Ordnance Datum (AOD) to the west of the site and the rail lines at a level of up to ~173m AOD. Ground levels also fall away less steeply to both the north and south.
- 2.8. The site is predominantly grassland with some small to medium trees along the western boundary. Hardstanding areas are only present in form of gravel surfaced driveway that slopes up from Bridgemont (immediately to the north of No.52) and asphalt surfaced car park south of No.36 Bridgemont.

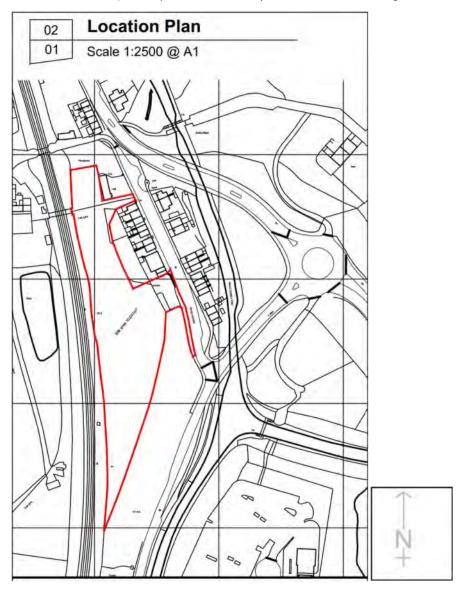


Figure 2.3 Location Plan (Source TADW Architects).



3 EXISTING GROUND CONDITIONS

Geology - source: Peak Environmental Solutions Phase 1 Site Investigation 42056R1 April 2020.

- 3.1. The available geological does not indicate presence of the artificial deposits in the site area.
- 3.2. The superficial deposits beneath the site are indicated as Quaternary Devensian Till.
- 3.3. The underlaying bedrock geology is indicated as Carboniferous Pennine Lower Coal Measures formed of mudstones, siltstones, and sandstones with subordinate coal seams.
- 3.4. For further details please refer to:
 - Peak Environmental Solutions Site Investigation Report 42056R1,
 - Peak Environmental Solutions Mining Risk Assessment Report 42056R2
 - BGS GeoReport_317107/21928.

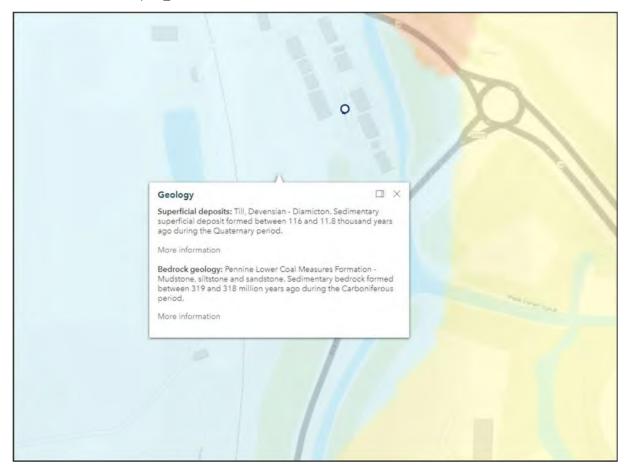
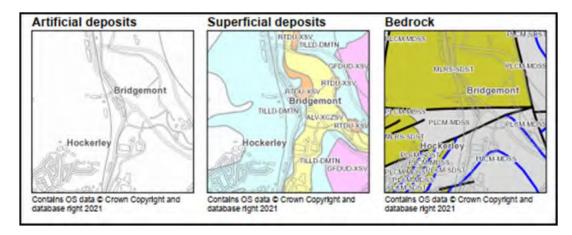
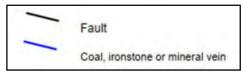


Figure 3.1 BGS Geology of Britain map.







Map colour	Computer Code	Rock name	Rock type
	ALV-XCZSV	ALLUVIUM	CLAY, SILT, SAND AND GRAVEL
	GFDUD-XSV	GLACIOFLUVIAL DEPOSITS, DEVENSIAN	SAND AND GRAVEL
	TILLD-DMTN	TILL, DEVENSIAN	DIAMICTON
	RTDU-XSV	RIVER TERRACE DEPOSITS (UNDIFFERENTIATED)	SAND AND GRAVEL

Map colour	Computer Code	Rock name	Rock type
	MLRS-SDST	MILNROW SANDSTONE	SANDSTONE
	PLCM-SDST	PENNINE LOWER COAL MEASURES FORMATION	SANDSTONE
	PLCM-MDSS	PENNINE LOWER COAL MEASURES FORMATION	MUDSTONE, SILTSTONE AND SANDSTONE

Figure 3.2 Source: BGS GeoReport_317107/21928.GS. (BGS)

- 3.5. The BGS hold borehole log records for the area provide additional ground condition information. The nearest log relates to a borehole within Bridgemont ~25m to the east of site. The drilling identified ~1.2m of made ground over ~2.5m of sandy clay over bands of mudstone, siltstone and sandstone extending to the full depth of the borehole at 20m below ground level (bgl).
- 3.6. A second borehole located to the north of the site, within the adjacent children's play area and also records ~3.2m of made ground underlain by gravel and cobbles extending to 6.8m bgl. Silty clay was identified beneath the gravel extending to the base of the borehole at 8m bgl.



Hydrology and Hydrogeology – source: Peak Environmental Solutions Phase 1 Site Investigation 42056R1 April 2020.

- 3.7. The nearest surface water course is a small stream within a culvert located ~15m to the north of the northern tip of the site beneath Bridgemont. The stream comes down the Ringstone Clough from the west and then disappears before emerging ~45m to the east of the site.
- 3.8. The nearest main river is the River Goyt located ~185m to the east at its closest point. The Goyt flows generally to the north, but meanders around the valley base.
- 3.9. There is also a pond located ~25m to the west of the site and on the far side of the railway lines.
- 3.10. The Toddbrook Reservoir is located some 800m south of the site at its closest point, south of the town of Whaley Bridge. The Toddbrook Reservoir is owned by the Canal & River Trust.

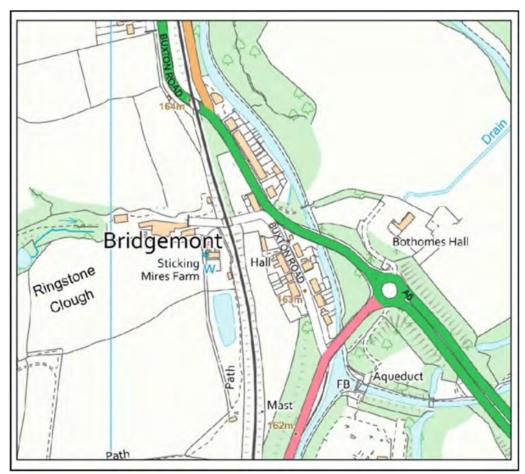


Figure 3.3. Existing Waterbodies in proximity of site. Source: High Peak Borough Council Interactive Planning Maps

- 3.11. BGS aquifer maps published by the EA record the superficial till deposits as a Secondary (Undifferentiated) Aquifer indicating that they are unlikely to support large scale groundwater abstraction. The Carboniferous Coal Measures are classified as a Secondary A aquifer: 'permeable layers capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important source of base flow to rivers. These are generally aquifers formerly classified as minor aquifer'.
- 3.12. The EA groundwater vulnerability map records the site as being in an area of medium to low vulnerability where the near surface deposits offer reasonable protection to underlying groundwater resources.



3.13. The site is not located within an EA defined Source Protection Zone for the protection of important groundwater resources.

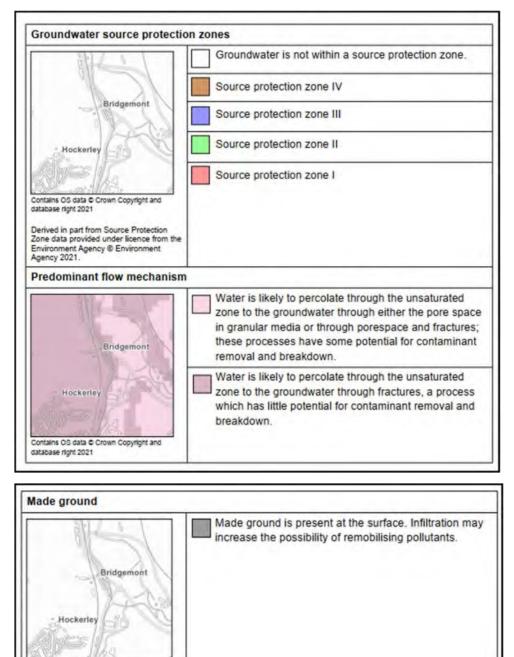


Figure 3.4 Source: BGS GeoReport_317107/21928.GS. (BGS)

- 3.14. Water is likely to percolate through the unsaturated zone to the ground water through fractures, which has little potential for any contaminants to be removed and breakdown, therefore if infiltration is to be proposed on site, pollution removal measures should be considered.
- 3.15. No abstractions from groundwater are currently recorded on the EA database within 1 km of the site.



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Client: Treville Properties Ltd

Site address: Land west of Bridgemont, SK23 7PB

FRA & DRAINAGE STRATEGY

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Controlled Waters Risk Assessment – source: Peak Environmental Solutions Phase 1 Site Investigation 42056R1 April 2020.

3.16. Phase 1 Site Investigation 42056R1 April 2020 identifies Very Low to Low risks for the redeveloped use, however, recommendation for the Phase 2 investigation has been made to allow to reach a conclusion about the actual presence or severity of ground contamination at the site. (See recommendations within section 5.0 Phase 1 Report 42056R1).



4 EXISTING DRAINAGE DETAILS

Public Sewers

- 4.1. Sewers within the area are managed by United Utilities, public sewers records and UU consultations are included within APPENDIX 5.
- 4.2. There is an existing 225mm dia combined sewer within Buxton Road. Based on the United Utilities sewer records, details of the combined manhole within proximity of the site are as follows:
 - 2300 CL = 163.66 AOD IL = 160.54 AOD Depth to invert = 3.12m
- 4.3. There sewer maps do not indicate presence of any public sewer crossing the site.

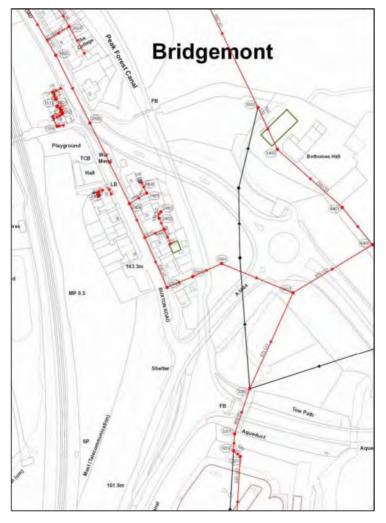


Figure 4.1 Extract from United Utilities Sewer Records

- 4.4. It is not expected that any sewer diversion will be required.
- 4.5. United Utilities has commented on the proposed development and their comments are included within **APPENDIX 5** for reference.
- 4.6. All works near to public sewers will need to be agreed and approved by United Utilities prior to development.



Client: Treville Properties Ltd Site address: Land west of Bridgemont, SK23 7PB FRA & DRAINAGE STRATEGY

5 PROPOSED DEVELOPMENT DETAILS

- 5.1. This document has been prepared in support of an Outline Planning Application for housing development at Land to west of Bridgemont, Whaley Bridge, SK23 7PB.
- 5.2. The proposal residential development consists of construction of 38 no residential units (mixture of dwellings and flats) with associated car parking, access road and landscaping as outlined in proposed site plans in APPENDIX 2.
- 5.3. Proposed contributing areas positively drained have been calculated, within the application site and are summarised in Table 2, and are to be read in conjunction with 'Proposed Site Contributing Areas Plan' included in APPENDIX 4.

Area m² ha

Application Site Area Total 10,041 1

Proposed impermeable areas positively drained. 3844 0.38

(10% urban creep allowance included)

Percentage of Impermeable (PIMP) within application site 38%

Table 2 Proposed site areas.

6 METHODOLOGY

- 6.1. Developer and Local Authorities should seek opportunities to reduce the overall level of flood risk through the layout design and form of development and the appropriate application of sustainable techniques.
- 6.2. The key objective is to manage the flow rate and volume of surface runoff to reduce the risk of flooding and water pollutions as well as to improve biodiversity and local amenity.
- 6.3. This assessment will identify and assess the risks of all forms of flooding to the proposed development as well as demonstrate how these flood risks should be mitigated, taking the potential effects of climate change into account.

Planning Policy and Legislation

- 6.4. This assessment has been carried out in line with:
 - The National Planning Policy Framework,
 - Planning Practice Guidance Technical Guidance (Flood Risk and Coastal Change),
 - Non-statutory technical standards for sustainable drainage systems,
 - Derbyshire's Local Flood Risk Management Strategy & related guidance.



Sources of Information and Consultations

6.5. Reference has been made to:

- Gov.uk long term flood risk information.
- British Geological Survey site online data (BGS).
- Level 1 SFRA Flood Risk Mapping figures.
- Peak Environmental Solutions Site Investigation Report 42056R1,
- Peak Environmental Solutions Mining Risk Assessment Report 42056R2,
- BGS GeoReport_317107/21928.
- Topographical Survey and TADW architects proposed site plan 3111106/02/P14.
- FRA QMF 09.20 issue 3 by Cole Easdon Consultants (CEC),
- Peak Environmental Solutions Report in respect of Preliminary Trial Pitting for Infiltration Testing Purposes dated 29.11.2021 ref: 42056R4/Rev.A.
- UU consultation/response for planning ref: HPK/2020/0180



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7 GENERAL DEFINITION OF POTENTIAL FLOOD HAZARDS

- 7.1. The potential sources of flooding which could affect the site have been identified in this section. Their influence on the proposed development and any mitigation measures will be discussed within this report.
- 7.2. Fluvial Flood Risk This type of flooding can occur through the inundation of the flood plain, overtopping and breaching of defences and blockages of culverts of flood channels.
- 7.3. Tidal/Coastal Flood Risk This flooding is due to the accumulation of water along the coast caused by rising sea water above normal levels. Coastal flooding can result from a combination of high tides, stormy weather conditions and tidal surges in times of low atmospheric pressure.
- 7.4. Canal Flood Risk Flooding can occur from man-made channels such as canals. This is usually due to the failure of canal embankment.
- 7.5. Flooding from Artificial Waterbodies Identifies areas that are most likely to flood following the sudden catastrophic failure of a reservoir. The EA states that the possibility of reservoir flooding is extremely unlikely and there has been no loss of life in the UK from reservoir flooding since 1925. Since then, reservoir safety legislation has been introduced to make sure reservoirs are well maintained
- 7.6. Flooding from Local Sewers Extreme rainfall events may overwhelm sewer systems and cause local flooding. This is not something that can be predicted/modelled.
- 7.7. Ground Water Flooding Occurs when the water table rises above normally expected and anticipated levels and intersects with the surface, this is usually after long periods of sustained rainfall. This is most likely to occur in low lying areas that are underlain by permeable rock such as chalk or sandstone and are classified as regional aquifers. Groundwater flooding may also rise from localised sands and gravels in valley bottoms underlain by less permeable rocks. Generally, the water table rises in wet winter months and falls in summer months as the water migrates to the surface water courses. Datasets show the susceptibility indication, which identifies areas where geological conditions may result in flooding and where groundwater may come close to the surface. It is not an indication of flood risk, i.e., an indication of likelihood of such flooding occurring (it doesn't provide information on the depth of the flood or the likelihood of occurrence of an event of a particular magnitude). It does show if the area is susceptible to groundwater flooding occurring based on the geological conditions. Properties with basements are more likely to be affected by groundwater flooding.
- 7.8. Surface Water Flooding Also known as pluvial flooding results from overland flow before the runoff enters a watercourse or sewer. Surface water flooding occurs when drainage systems have insufficient capacity to deal with the volume of rainfall. The critical factors in surface water flooding are the volume and intensity of rainfall and the topography and permeability of the surface that the rainfall falls onto (PPS25 Practice Guidance). It is usually the result of high intensity rainfall but can occur with lower intensity rainfall when the land has a low permeability and/or is already saturated, frozen, or developed. As a result, surface water flooding can occur quickly and is often difficult to predict. In urban areas, rainwater is often drained into combined sewers. Combined sewers accept foul water and surface water. It should be noted that if the capacity of drainage systems is exceeded. Flood water will be contaminated with raw sewage. In addition, sudden and intense rainfall cannot drain away freely due to the impermeable surfaces of roads, footpaths, and car parking. Therefore, surface water can also arise from sheet run-off from adjacent land.



FRA & DRAINAGE STRATEGY

8 PROBABILITY OF FLOODING

Fluvial Flood Risks - flooding from Main Rivers and Sea.

8.1. The site is classified within Environmental Agency Flood Zone 1 an area with low probability of flooding representative of land having less than 1 in 1000 (0.1% AEP) of river or sea flooding in any year.

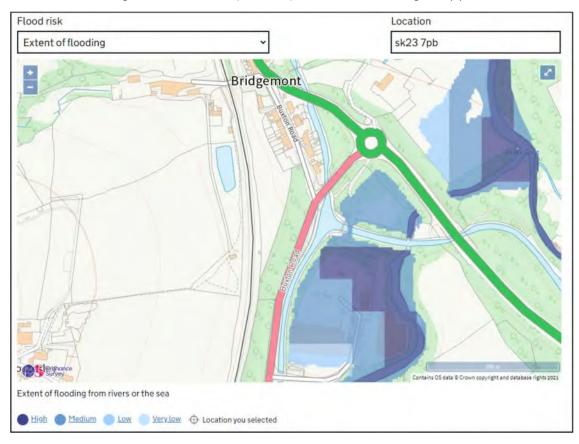


Figure 8.1 Environmental Agency - Flood Map for Planning (Gov.uk)

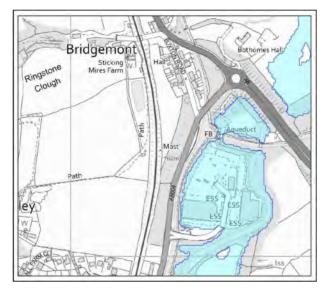


Figure 8.2 Extend of Flood Zone 2. Source: High Peak Borough Council Interactive Planning Maps.



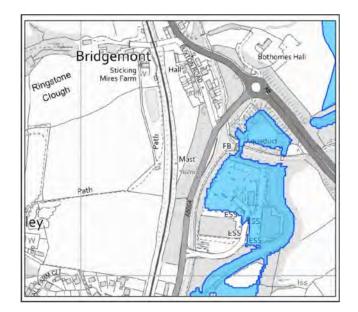


Figure 8.3. Extend of Flood Zone 3. Source: High Peak Borough Council Interactive Planning Maps.

8.3. The River Goyt is located 185m east of the site at its closest point, and at a lower topographical level than the site. Fluvial flood risk to the site is therefore considered to be Low

Fluvial Flood Risk - flooding from Ordinary Watercourses.



- 8.4. Flood and Water Management Act 2010 defines "Ordinary Watercourse" as a "watercourse" that does not form part of a "main river" and can include rivers, streams, ditches, drains, cuts, culverts, dikes, sluices, sewers (other than public sewers within the meaning of the Water Industry Act 1991), ponds and passages through which water flows.
- 8.5. The maintenance of Ordinary watercourses is the responsibility of the landowner.
- 8.6. Local Lead Authority has a power to regulate i.e., powers associated with the prevention, mitigation and remedying of flood damage.
- 8.7. The map in below indicate that the nearest identified open watercourse is the Ringtone Clough stream to the northwest of the application site.
- 8.8. The Ringstone Clough appears to be culverted under the Bridgemont to the North of the site, crossing under the existing railway embankment, the playground of the existing Nursery, (~15m north of the site boundary), and under Bridgemont, before emerging ~45m to the east of the site.

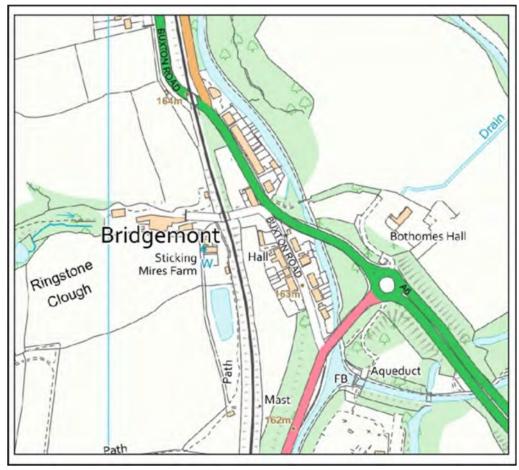


Figure 8.4. Existing Waterbodies in proximity of site. Source: High Peak Borough Council Interactive Planning Maps

- 8.9. There are no confirmed ordinary watercourses crossing the application site.
- 8.10. Based on the flood mapping available to date and the topography of the site, it can be concluded that the site is at Low risk from fluvial flooding generated by ordinary watercourses.



Canal Flood Risk

8.11. Local Waterway map provided by Canal and River Trust indicates that the nearest waterway is the Peak Forest Canal located 63m to the northeast of the application site.



Figure 8.5 Local Waterway map - Canal and River Trust

- 8.12. Canal failure mapping includes two types of failure:
 - Breach of raised canal embankments failure of the embankment due to weaknesses; these are typically caused by erosion or animal burrowing but can also arise from poor maintenance.
 - Aqueduct failure an aqueduct is where the canal passes over infrastructure such as roads, railways and subways, or over other canals and rivers. Failures of these are typically caused by the collapse of the underlying culvert.
- 8.13. Canal systems are maintained, improved, and regularly inspected by British Waterways, therefore flood risk from this source is generally considered to be low.
- 8.14. The Peak Forest Canal is located approximately 50m East of the site to the east of the site boundary, at lower topographical level than the site.
- 8.15. Information regarding the Canal Failure Impact Modelling is not available at the time of writing this report but considering the location and topography of the area the risk from flood due to Canal Failure are considered Low.



Artificial Waterbodies – Reservoirs

- 8.17. Reservoir flood plans are prepared by their owners, however as these documents are considered sensitive due to national security, only indicative plans are made available by the Environmental Agency.
- 8.18. The EA map below shows that the application site lies just outside of the area at risk of flooding from nearby reservoirs.



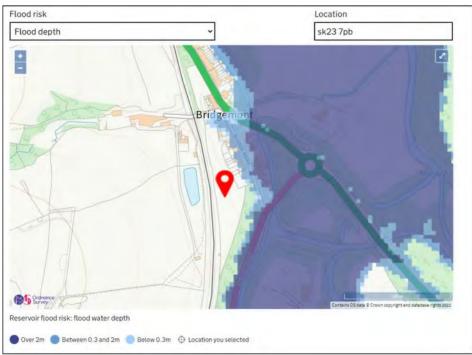


Figure 8.6 Flood risk from reservoirs (Gov.uk).



- 8.19. The 'EA Risk of Flooding from Reservoirs' Map indicates that the northern end of the site is at risk of inundation in the event of a breach of the Toddbrook Reservoir, to a maximum depth of 0.3m, whilst the road immediately east of the site is at risk of inundation to a maximum depth of 2m.
- 8.20. Flood risk to the site in the event of a breach of the Toddbrook Reservoir is therefore considered to be moderate for access road the site and dwellings 1 &2.
- 8.21. If possible, finished floor levels within the northern end of the site should be set at 167.65mAOD, some 300mm above the estimated flood level. Similarly, the finished floor levels for proposed Dwellings 1 & 2 should be raised above the estimated flood level where feasible and flood resilient construction measures should be implemented. For flood resilient Construction details refer to CEC Flood Risk Assessment Report QMF09.20.
- 8.22. Flooding from reservoirs is considered extremely unlikely. There has been no loss of life in the UK from reservoir flooding since 1925. On this basis, the site is at Moderate to Low risk of flooding from this source.



Flooding from Local Sewers

- 8.23. Sewers in the area are owned and maintained by United Utilities and Highways.
- 8.24. UU assets record indicate presence of a 225mm diameter combined sewer within Bridgemont public highway. See sewer maps included within APPENDIX 5 for reference.
- 8.25. The site and surrounding area topography fall from south-west to north-east, therefore, this sewer is at a lower topographical level than the site. If the sewer beneath Ridgemont were to surcharge and flood, the floodwater would follow the area contours and flow away from the site following the falls within the highway.
- 8.26. Properties 1 &2 could be at risk of flooding from surcharged sewers within Bridgemont highway therefore mitigation measures such as raised thresholds as well as flood resilient construction measures should be implemented. For flood resilient Construction details refer to CEC Flood Risk Assessment Report QMF09.20. Construction details refer to CEC Flood Risk Assessment Report QMF09.20.
- 8.27. Flood risk from existing sewers is therefore considered to be Moderate to Low.

Highway Drainage System

- 8.28. The site is currently bounded by Bridgemont to the east.
- 8.29. Based on local information, photo and video evidence provided by Treville Properties, there is localised highway flooding occurring within Bridgemont. The evidence suggest that the flooding issues are associated with high siltation occluding in the area and possible low frequency of the maintenance of the road gullies. Majority of the road gullies were blocked/ full of silt/leaves, not performing to their design capacity.
- 8.30. Units 1 & 2 (cottage flats) with proposed access directly from Bridgemont should have raised thresholds as well as flood resilient construction. For flood resilient Construction details refer to CEC Flood Risk Assessment Report QMF09.20. Construction details refer to CEC Flood Risk Assessment Report QMF09.20.
- 8.31. As Bridgemont is situated substantially lower than most of the proposed application site, the likelihood of flooding from this source is deemed low for majority of the site, moderate for units 1 & 2, where mitigation measures should be considered.



Ground Water Flooding Risk

8.32. The BGS Report 317107/21928 indicates that Groundwater is likely to be less than 3m below the ground surface for at least part of the year especially within the northern part of the site.

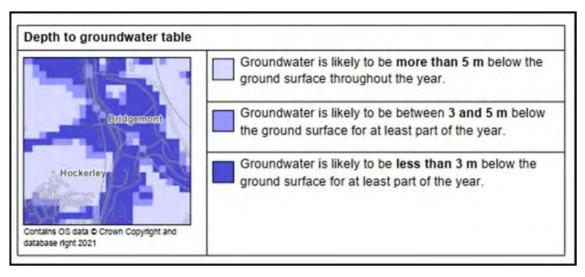


Figure 8.7 BGS Depth to Groundwater Table.

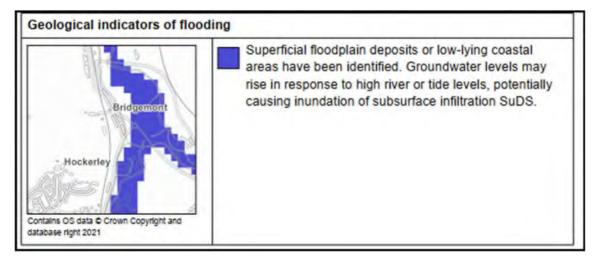


Figure 8.8 BGS Depth to Groundwater Table.

- 8.33. Based on the information presented in the BGS report, it is considered that the application has Low risk of ground water flooding to occur on surface, but groundwater levels should be considered if any subsurface infiltration SuDS features are to be considered for this application site.
- 8.34. Preliminary trial pit testing undertaken for infiltration testing purposes on 4th of November 2021 identified cohesive clayey ground at very shallow depths, with resting water levels (in early winter) at around 1.5mbgl.





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- 8.35. Flooding from overland flows can occur if a significant volume of intercepted rainfall or surface runoff does not reach any drainage channel or permeable ground and is able to form significant surface accumulations.
- 8.36. It is usually associated with high intensity rainfall events but can also occur during low-intensity events when the ground is saturated / frozen or has low permeability.
- 8.37. Flooding from surface water is difficult to predict as rainfall location and volume are difficult to forecast. In addition, local features can greatly affect the chance and severity of flooding.
- 8.38. Flood risk from surface water map provided by Gov.UK in Figure 8.9 shows critical flow paths and areas situated in topographical depressions, which could flood following an extreme rainfall event.



Figure 8.9 Flood Risk from Surface Water - Extend of Flooding (Gov.uk).

- 8.39. The EA Map 'Risk of Flooding from Surface Water' indicates that the proposed application site is at very low risk of surface water flooding.
- 8.40. Surface water flood flow path are indicated to the north and east of the site, which broadly follows the Bridgemont highway and the route of the culverted Ringstone Clough to the north.
- 8.41. The proposed application site is sited higher than the area shown on map as the extend of surface water flooding. Therefore, the risk of surface water flood flows entering the site are considered Low for majority for the the application site, Moderate in relation to Unit 1 &2 with proposed access form Bridgemont.
- 8.42. Units 1 & 2 (cottage flats) with proposed access directly from Bridgemont should have raised thresholds as well as flood resilient construction. For flood resilient Construction details refer to CEC Flood Risk Assessment Report QMF09.20. Construction details refer to CEC Flood Risk Assessment Report QMF09.20.



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8.43. The Strategic Flood Risk Assessment (SFRA) (September 2008) for HPBC and the Local Flood Risk Management Strategy (LFRMS) (July 2015) for Derbyshire record that surface water flood risk is an issue within the HPBC district. However, no surface water flooding incidents have been recorded in the vicinity of the site. Source: CEC FRA 2020.

- 8.44. New developments can increase the volume and rate of surface water run-off discharged, which could cause an increase in surface water flood risk both on site and elsewhere in the catchment. Therefore, the surface water runoff generated as a result of the development should be managed using Sustainable Urban Drainage Systems (SUDS) to minimise the rate of discharge, volume, and environmental impact of surface water runoff.
- 8.45. The design of surface water drainage should ensure that there are no uncontrolled off-site overland flood flows created by the proposed development. Where possible, site surfaces should be modelled so that flood flows generated on site from events beyond the stipulated drainage design criteria will flow to, and be contained on site within, landscaped or paved areas such that there is no increased risk of flooding to buildings and other vulnerable areas. Flood flows up to the critical 1% AEP event will not be allowed to flow from the site onto adjoining property or highways.



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Flood Risk Overview

8.46. The potential sources of flooding identified above have been summarised in Table 3 Potential Sources of Flooding - Overview . Those posing the greatest flood risk to the site will be investigated further in Section 9 to determine possible mitigation measures.

Table 3 Potential Sources of Flooding - Overview

	POTENTIAL SOURCES OF FLOODING					
SOURCES OF FLOODING	HIGH	меріпм	row	NO INFORM ATION	COMMENTS	
FLUVIAL			1		Flood Zone 1	
CANAL			1			
ARTIFICIAL WATERBODIES			1		The site is at risk of being affected in the event of reservoir failure, although the risk is considered by The Environment Agency to be very low.	
SEWERS			1			
HIGHWAY DRAINAGE		1	1			
GROUND WATER		1	1			
PLUVIAL RUNOFF		1	1			



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9 APPROPRIATE LAND USE

Flood Zone Requirements

- 9.1. This report has been prepared for residential development at Land off Bridgemont, SK23 7PB as outlined in proposed site plan in APPENDIX 2.
- 9.2. The National Planning Policy Framework (NPPF) encourages a sequential risk-based approach to determine the suitability of land for development in flood risk areas. It advises local planning authorities to demonstrate that there are no reasonably available sites in areas with a lower probability of flooding that would be appropriate to the type of development or land use proposed.
- 9.3. In areas at risk of river flooding, the NPPF advises that preference be given to new development in Flood Zone 1. If there are no reasonably available sites in Flood Zone 1 the flood vulnerability of the development can be considered in locating development in Flood Zone 2 and then Flood Zone 3. Within each flood zone new development should be directed to sites at the lowest probability of flooding from all sources.
- 9.4. The Environment Agency (EA) 'Flood Map for Planning Rivers and Sea', included in APPENDIX 3, shows that the site is wholly located within Flood Zone 1 an area outside of the extreme flood extent and considered to have a less than 1 in 1000 (0.1% AEP) annual probability of flooding from rivers or the sea in any year.
- 9.5. Flood Risk Vulnerability Classification in Table 4 indicates that all land uses are appropriate in Flood Zone 1 and Sequential Test is not required.
- 9.6. There are no Finished Floor Requirements in the Flood Zone 1 for the proposed Development, however, raised door threshold approx. 150mm above external ground level is recommended to minimise the risk to people and property in exceedance events.

Table 4 Flood Risk Vulnerability Classification

Classification		Essential Infrastructure	Water Compatible	Highly Vulnerable	More Vulnerable	Less Vulnerable
	Zone 1	11	11	11	11	11
Flood Zone _ Classification	Zone 2	11	11	Exception test required	11	11
	Zone 3a	Exception test required	*	××	Exception test required	11
	Zone 3b	Exception test required	//	××	××	**



Identified Flood Risk – Drainage Strategy Mangement/Mitigation Measures.

- 9.7. Initial Flood Risk Overview identified Low to Moderate Flooding Risk to the application site.
- 9.8. With identified ground water levels resting (in early winter) at around 1.5mbgl (during preliminary trial pit testing undertaken for infiltration testing purposes on 4th of November 2021) consideration should be given during detailed design stage to mitigate the risks as far as reasonably possible by:
 - basements should be avoided,
 - waterproofing where construction below ground levels.
 - · consideration should be given during design and construction of retaining walls with regards to drainage and water pressure.
- 9.9. The existing risks of pluvial flooding within the vicinity of the site, within Bridgemont will remain after development and consideration should be given to mitigation of these risks as far as reasonably possible.
- 9.10. Any flood flows onto the site from adjoining property will either be retained on site safely or be encouraged to pass across the site such that there is no increased risk of flooding to buildings and other vulnerable areas.
- 9.11. Setting finished floor level of buildings at least 150mm above surrounding external ground, shedding surface water away from the buildings, will avoid the risk of damage to buildings and contents as a result of overland flood flows around the site.
- 9.12. The proposed on-site surface water drainage design will ensure that there are no uncontrolled off-site overland flood flows created by the proposed development. Where possible, site surfaces will be modelled so that flood flows generated on site from events beyond the stipulated drainage design criteria will flow to, and be contained on site within, landscaped or paved areas such that there is no increased risk of flooding to buildings and other vulnerable areas. Flood flows up to the critical 1% AEP event will not be allowed to flow from the site onto adjoining property or highways.
- 9.13. Proposed on-site drainage will be designed and constructed in accordance with current best practice and The Building Regulations as appropriate.
- 9.14. Development owners or Private Management Company will be responsible for the maintenance of the private drainage system on site to ensure satisfactory performance.
- 9.15. United Utilities will be responsible for maintenance of public sewers.
- 9.16. The highway authority will be responsible for the maintenance of any highway drainage.
- 9.17. In the event of extreme emergency, the local authority and other emergency services have contingency plans for dealing with the consequences of flooding.
- 9.18. The following sections of this report will consider a strategy for the management of surface water runoff to ensure that via resilient design, construction and maintenance of the sustainable drainage systems and water retention measures, there will be no significant off-site impacts as a result of this development, therefore the proposal will satisfy paragraph 103 of the Framework.



10 SUSTAINABLE URBAN DRAINAGE STANDARDS

- 10.1. The National Standards for Sustainable Drainage systems (NSSDS 2011) and Non-Statutory Technical Standards for Sustainable Drainage (NSTSSD 2015) require that 'the development must not increase the risk of flooding elsewhere'.
- 10.2. 'For greenfield developments, the peak runoff rate from the development to any highway drain, sewer or surface water body for the 1 in 1-year rainfall event and the 1 in 100-year rainfall event should never exceed the peak greenfield runoff rate for the same event'. (S2 NSTSSD 2015)
- 10.3. 'Where reasonably practicable, for greenfield development, the runoff volume from the development to any highway drain, sewer or surface water body in the 1 in 100-year, 6-hour rainfall event should never exceed the greenfield runoff volume for the same event'. (S4 NSTSSD 2015)
- 10.4. Where it is not reasonably practicable to constrain the volume of runoff to any drain, sewer, or surface water body in accordance with S4 above, the runoff volume must be discharged at a rate that does not adversely affect flood risk. (S6 NSTSSD 2015)
- 10.5. In practical terms, the above guidelines mean, that the proposed development runoff rate must provide betterment or be equal to the calculated existing greenfield runoff rate where reasonably possible.



11 EXISTING RUNOFF RATE

Wallingford Procedure Variables

11.1. The Wallingford Procedure Variables Values for the site are included in Table 5.

Table 5 Wallingford Procedure Values for the site.

Variable	Map Values	
Average Annual Rainfall (SAAR)	1092	
M5-60-minute rainfall depth	18.000mm	
Ratio of M5-60 to M5-2-day rainfall	0.3	
Average Intensity (mm/hr) 100yr 6hr	10.177	
Rainfall 100 years 6 hrs.	61.5 mm	
Soil Type (SOIL)	2	3
SPR Standard Percentage Runoff	0.3	0.37
Soil Characteristics	Moderate (The superficial deposits >3m Superficial deposits likely to permit moderate infiltration permeability .	cohesive clayey ground - low infiltration, ground/perched water at 1.5Mbg identified during preliminary trial pitting
<u>Time of Concentration</u>	15	

Greenfield Runoff Rate

11.2. An assessment of the greenfield runoff rates has been undertaken using the ICP SUDS calculation module within Micro Drainage and IH124 Methodology and the results are summarised below. Calculations are included within APPENDIX 7.

Table 6 Greenfield runoff rate for range of return periods.

Return Period (Yr.)	Runoff Rate (I/s) Application Site (1 ha)	Runoff Rate (I/s) Application Site (1 ha)	Runoff Rate (I/s) Application Site (1 ha)	
	ICP SuDS MicroDrainage	UK SuDS Soil 2	UK SuDS Soil 3	
QBAR (rural)	2.7	3.07	4.83	
Q1 Y (100%)	2.4	2.67	4.21	
Q30 Y (3.33%)	4.7	5.21	8.22	
Q100 Y (1%)	5.7	7.27	10.05	



Greenfield Runoff Volume

11.3. An assessment of the greenfield runoff volume has been undertaken using Micro Drainage and the results are summarised below. Calculations are included within APPENDIX 7.

Table 7 Greenfield Volume for 100yr return period 6 hour storm duration.

	Application Site (1 ha) Soil 2(SPR = 0.3)	Application Site (1 ha) Soil 3 (SPR = 0.37)
Percentage Runoff (%)	33%	40%
Greenfield Runoff Volume (m³)	205.746	249.053

12 PROPOSED RUNOFF RATE AND VOLUMES

Proposed Runoff Rate

12.1. 'For greenfield developments, the peak runoff rate from the development to any highway drain, sewer or surface water body for the 1 in 1-year rainfall event and the 1 in 100-year rainfall event should never exceed the peak greenfield runoff rate for the same event'. (S2 - NSTSSD 2015)

Proposed Runoff Volume

- 12.2. 'Where reasonably practicable, for greenfield development, the runoff volume from the development to any highway drain, sewer or surface water body in the 1 in 100-year, 6-hour rainfall event should never exceed the greenfield runoff volume for the same event'. (S4 NSTSSD 2015).
- 12.3. The proposed development will introduce approximately 3900 m2 (0.39 ha) of impermeable areas.
- 12.4. The proposed runoff volume in the 1 in 100-year, 6-hour rainfall event can be a calculated as follows:

 $V = R \times C \times A = 0.061 \text{m} \times 0.95 \times 3800 \text{m}^2 + 0.061 \text{m} \times 0.40 \times 6200 = 220.21 + 151.28 = 371.49 \text{m}^3$ Where:

V - volume in m3

C — Coefficient of run off (0.95 has been allowed for impermeable areas and 0.4 for permeable areas (soil 3 as per trial pitting report in Appendix 3.)

R - rainfall 100 years 6 hour in m

A - Contributing area in m2

 $R = I_{(100/6hr)} \times 6 = 10.177$ mm/hr. $\times 6$ hr = 61.06mm = 0.061m

Table 8 Post-Development runoff volume for 100yr return period 360min storm duration

	Volume
Post Development Runoff Volume (m³)	249.053
Post Development Runoff Volume (m³)	371.49m³
Increase in runoff volume post development (m³)	122.437

- 12.5. Where it is not reasonably practicable to constrain the volume of runoff to any drain, sewer, or surface water body in accordance with S4, the runoff volume must be discharged at a rate that does not adversely affect flood risk. (S6 NSTSSD 2015).
- 12.6. In practical terms, the above guidelines mean, that the proposed development runoff rate must provide betterment or be equal to the calculated existing greenfield runoff rate.



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- 12.7. Where flow rates are less than 5.0 l/s consent for discharge is usually set at 5.0 l/s if blockage from vegetation and other materials is possible. Lower consent flow rates may be set where the blockage risk is addressed by using appropriate drainage elements.
- 12.8. The comparison of greenfield and proposed runoff rates has been included within the Table 9.

Table 9 Greenfield and Proposed runoff rate comparison.

Return Period (Yr.)	Runoff Rate (I/s) Application Site (1	Runoff Rate (I/s) Application Site (1	Runoff Rate (I/s) Application Site (1 ha)	Proposed Discharge Rate
	ICP SuDS MicroDrainage	UK SuDS Soil 2	UK SuDS Soil 3	
	l/s.	I/s.	I/s	l/s
QBAR (rural)	2.7	3.07	4.83	
Q1 Y (100%)	2.4	2.67	4.21	5
Q30 Y (3.33%)	4.7	5.21	8.22	5
Q100 Y (1%)	5.7	7.27	10.05	5

12.9. Proposed discharge rates below are considered meeting the volume control standard (S6 NSTSSD 2015).

13 PROPOSED RUNOFF DESTINATION

- 13.1. According to National Standards for sustainable drainage systems Part II Section A Runoff destination from the following destinations must be considered for surface runoff in order of preference:
 - Discharge into the ground
 - Discharge to surface water body
 - Discharge to a surface water sewer
 - Discharge to a combined sewer
- 13.2. Subject to complying with these National standards, different destinations may apply for different parts of the site

Discharge into the ground - inifiltration expectations

- 13.3. Five classes of soil are recognised in England as shown in the Soil Classification table below.
- 13.4. The soil Index SOIL is based on the Winter Rain Acceptance Parameter (WRAP) included in the Flood Study Report and broadly descries the infiltration potential of the soil derived by consideration of soil permeability, topographic slope, and the likelihood of impermeable layers.
- 13.5. The soil classification (BGS) for the site is indicated to be of Type 2 indicating high potential for infiltration.
- 13.6. BGS_317107 reports included in Appendix 3provide an initial desk study-based assessment of the infiltration opportunities for the site.
- 13.7. Preliminary trial pitting has been undertaken on site to establish whether shallow/near surface (<2m) soil/groundwater conditions could be considered suitable for further BRE365 compliant infiltration testing for soakaway/SuDS design purposed.</p>



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13.8. Cohesive clayey ground has been identified at very shallow depth, with resting water levels (in early winter 5-8th November 2021) at around 1.5 mbgl.

- 13.9. Based on the preliminary trial testing undertaken on site as described in Peak Solution Environmental Report ref: 42056R4 Rev.A included in Appendix 3, it is considered that soils characteristics on site are more representative of those for the Soil Type 3 or 4 in the table below, therefore opportunities for discharge via infiltration maybe limited.
- 13.10. Proximity of railway and Network Rail requirements should also be considered during detailed design stage in respect of infiltration features.

Table 10 Soil Classification

SOIL	WRAP	RUNOFF	SOIL VALUE	SPR	SOIL CHARACTERISTICS
1	Very High	Very low	0.15	0.10	Well drained permeable sandy or loamy soils and shallower analogues over highly permeable limestone, chalk, sandstone, or related drifts. Earthy peat soil drained by dikes and pumps. Less permeable soils in valleys.
2	High	Low	0.3	0.30	Very permeable soils with shallow groundwater. Permeable soils over rock, commonly on slopes in western Britain associated with smaller areas of less permeable wet soils. Moderately permeable soils, some with slowly permeable subsoils.
3	Moderate	Moderate	0.4	0.37	Relatively impermeable soils in boulder and sedimentary clays and in alluvium, especially in eastern England. Permeable soils with shallow groundwater in low lying areas. Mixed areas of permeable and impermeable soils in approximately equal proportions.
4	Low	High	0.45	0.47	Clayey, or loamy over clayey soils with an impermeable layer at shallow depth.
5	Very Low	Very High	0.5	0.53	Soils of the wet upland with peaty or humose surface horizons and impermeable layers at shallow depth. Deep raw peat associated with gentle upland slopes or basin sites. Bare rock cliffs and screes. Shallow, permeable rocky soil on steep slopes



Discharge to surface water body

13.11. The Map in Figure 8.4 below indicates that the nearest identified waterbody in proximity of the site is a culverted section of the Ringstone Clough watercourse to the north of the application site (~15m north of the site boundary) flowing in direction of the River Goyt to the east.

13.12. The culverted watercourse is located within third party land (Nursery playground) with two access chambers present within this area and it appears to be a culverted section of the Ringtone Clough crossing under the existing railway embankment to the north of the site in direction of the River Goyt.

13.13. Discharge at controlled discharge rate to the existing culverted watercourse should be considered, subject to approvals by LLFA and permission from third party landowner.

Discharge to surface water sewer

13.14. There are no surface water sewers in proximity of the site.

Discharge to combined water sewer – Proposed Outfall

13.15. Connection to existing 225mm diameter VC combined water sewer within Bridgemont is proposed for foul water from the proposed development and surface water from low laying area of the site (units 1 &2) and section of access road. All subject to agreement with United Utilities and confirmation of the proposed outfall invert levels.

13.16. Proposed outfall - combined manhole 2300 within Bridgemont Road (225mm dia combined sewer).

2300

CL =163.66 OAD - TBC

IL = 160.54 AOD - TBC

Depth to invert = 3.12m - TBC



14 Suds Components

- 14.1. Satisfactory collection, control, and discharge of storm water is now a principal planning and design consideration. This is reflected in recently implemented guidance, the National SuDS Standards, Ciria C753 The SuDS Manual (2015), as well as Part H of the Building Regulations 2015.
- 14.2. It is policy for all proposed surface water systems to identify the most appropriate method of controlling and discharging surface water. The design should seek to improve the local run-off profile by using systems that can either attenuate run-off and reduce peak flow rates or positively impact on the existing flood profile.
- 14.3. The most appropriate attenuation systems should ideally satisfy four main characteristics:
 - Provide the required volume of storage while minimising the loss of developable land.
 - Improve Water Quality
 - · Where possible provide opportunities to create additional amenity space.
 - · Where possible provide opportunities to promote biodiversity through the creation of new habitats.
- 14.4. Systems which best meet the above criteria are often referred to as Sustainable Drainage Systems (SuDS). SuDS aim to mimic the natural run off profile of the original catchment.
- 14.5. Initial assessment of the SuDS techniques is summarised in the Table below.

Table 11 Types of SuDS Components - Ciria SuDS Manual 2015.

Component Type		Description and Proposed Development Suitability		
Rainwater harvesting systems	Description	Rainwater is collected from the roof of a building or from other paved surfaces in an over ground or underground tank for use on site. Depending on its intended use, the system may include treatment elements. The system should include specific storage provision if it is to be used to manage runoff to a design standard.		
harv	Suitability	Provision of Water butts should be considered at details design stage.		
Green Roofs/ Blue Roofs	Description	A planted soil layer constructed on the roof of a building to create a living surface. Water is stored in the soil layer and absorbed by the vegetation. Blue roofs store water at roof level, without the use of vegetation.		
Gree	Suitability	Not viable for the proposed development – Pitched Roofs.		
Infiltration systems	Description	These systems collect and store runoff allowing it to infiltrate into the ground. Overlaying vegetation and underlaying unsaturated solid can offer protection to ground water from pollution risks.		
Infilt	Suitability	Opportunities for discharge via infiltration, based on the soil properties, site levels and proximity of the railway are limited for this site.		
Filter Strips	Description	Runoff from impermeable area is allowed to flow across a grassed or otherwise planted area to promote sedimentation and filtration.		
A S	Suitability	Will be further considered during detailed design stage.		
Filter drains	Description	Runoff is temporarily stored below the surface in a shallow trench filled with stone/gravel, providing attenuation, conveyance, and treatment (via filtration).		
Filte	Suitability	Will be further considered during detailed design stage.		



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Swales	Description	A vegetation channel is used to convey and treat runoff Shallow naturally landscaped channels that convey and/or infiltrate the runoff (via infiltration). These can be 'wet', where water is designed to remain permanently at the base of the swale, or 'dry' where water is only present in the channel after rainfall events. It can be lines, or unlined to allow infiltration.					
	Suitability	Not likely to be suitable due to the development layout.					
n systems	Description	A shallow landscaped depression allows runoff to pond temporarily on the surface, before filtering though vegetation and underlying soils prior to collection or infiltration. In its simplest form it is often referred to as a rain garden. Engineered soils (gravel and sand layers) and enhanced vegetation can be used to improve treatment performance.					
Bioretention systems	Suitability	Rain gardens will be incorporated within landscaped areas/ecological enhancement areas and during detailed design.					
Trees	Description	Trees can be planted within a range of infiltration SuDS components to improve their performance, as root growth and decomposition increase soil infiltration capacity. Alternatively, they can be used as standalone features within soil-filled tree pits, tree planters or structural soils, collection and storing runoff and providing treatment (via infiltration and phytoremediation).					
	Suitability	Existing trees will be retained where possible. Landscaping proposal should consider specification broad leaf trees with high water interception and tree cells.					
Pervious Pavements	Description	Runoff is allowed to soak through structural paving. This can be paving blocks with gaps betwee solid blocks, or porous paving where water filters though the block itself. Water can be stored i the subbase and potentially allowed to infiltrate into the ground.					
Pervious I	Suitability	Permeable surfaces with storage layer will be considered for all light trafficked areas to aid treatment and interception at source, before controlled discharge to the next element of drainage system.					
storage	Description	Large below ground voided spaces can be used to temporarily store runoff before infiltration, controlled release, or use. The storage structure is often constructed using geocellular or other modular storage systems, concrete tanks, or oversized pipes.					
Attenuation storage	Suitability	Attenuation for rainfall events up to and including 30yr events will be provided in large diameter pipes under the access road. Private attenuation storage tank/s will be utilized as part of the drainage proposal for rainfall events in excess of 30yr. Type and size of the required storage will be confirmed during detailed					
Detention Basin	Description	During a rainfall evet, runoff drains to a landscaped depression with an outlet that restricts flows, so that the basin fills and provide attenuation. Generally, basins are dry, except during and immediately following the rainfall events. If vegetated, runoff will be treated as it is conveyed and filtered across the base of the basin. Naturally, vegetated depressions designed to store runoff temporarily.					
۵	Suitability	Not suitable for the Proposed Development Layout.					
Ponds and wetlands	Description	Features with a permanent pool of water can be used to provide attenuation and treatment of runoff, where outflows are controlled, and water levels are allowed to increase following rainfall. They can support emergent and submerged vegetation along their shoreline and in shallow. Marshy zones, which enhance treatment processes and biodiversity.					
4	Suitability	Not suitable for the Proposed Development Layout.					

14.6. It is proposed to adopt appropriate SuDS throughout the new development wherever possible, with specific target areas being:



■ 1 in 1-year storage should be provided by Source Control SuDS techniques, such as :

- o rain gardens with broadleaves high water interception species,
- o trees cells,
- o permeable surfaces with overflow to next stage of drainage system.
- Site control attenuation and reduction in peak flows (controlled discharge) to proposed outfalls, thereby not increasing flood risk downstream of connection.
- Improvement of water quality arriving at outfall (passive removal of pollutants through permeable surfaces and filter chambers), thereby reducing potential for pollution downstream of the connection point.



Client: Treville Properties Ltd
Site address: Land west of Bridgemont, SK23 7PB
FRA & DRAINAGE STRATEGY

15 CLIMATE CHANGE ALLOWANCE

- 15.1. It is anticipated that climate change will bring an increase in rainfall intensity in the future and therefore an allowance for climate change should be included to help minimise vulnerability and provide resilience to flooding and coastal change in the future. Both the 'central' and 'upper end' allowance should be assessed to understand the range of impact.
- 15.2. The 'Central' allowance should be applied to the surface water drainage network/design to assess its performance and ability to contain critical events. The 'Upper End' allowance should be applied to assess the potential flood risk implications to the site and to ensure that flooding is wholly contained onsite.
- 15.3. The Environment Agency Guidance in Table 12 shows anticipated changes in extreme rainfall intensity across the country. Over the next 100years, the increase in extreme rainfall intensity is expected to be between 20-40%.

Table 12 Peak rainfall intensity allowance in small and urban catchments.

Applies across all of England	Total potential change anticipated for the 2020s (2015 to 2037)	Total potential change anticipated for the 2050s (2040-2069)	Potential Change anticipated for the 2080s (2070 – 2215)	
Upper End	+10%	+20%	+40%	
Central	+5%	+10%	+20%	

https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances#table-2

- 15.4. With an estimated design life of 100 years for residential development, any necessary onsite designs for drainage, soakaways or other suitable disposal methods limiting surface water disposal flows will incorporate rainfall intensities that have been increased by 25-40% to take account of the effects of climate change up until the year 2115.
- 15.5. It is recommended that for the proposed development the drainage is designed to contain (without surface flooding) to a 1 to 100 year 6-hour rainfall event with an 'Upper End' allowance included i.e., + 40% CC (Climate Change).

16 DESIGN FOR EXCEEDANCE

- 16.1. The drainage system will be designed so the flooding does not occur on any part of the site for 1:100yr rainfall event plus 40% climate change +10% urban creep allowance.
- 16.2. The design will consider flows resulting from rainfall in excess of the 1:100yr rainfall event. The exceedance routes will be directing the water towards landscaped and porous paving areas or designated hard standing areas away from buildings to minimize the risk to people and property via range of measures:
 - Slope of footpaths/driveways to direct surface water away from buildings,
 - Raised and dropped kerb to direct flow away from vulnerable areas,
 - Proposed site layout allowing exceedance flows to pass safely through the site without increasing risk elsewhere as reasonably possible.



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FRA & DRAINAGE STRATEGY

17 PRELIMIARY DRAINAGE STRATEGY

- 17.1. As part of any development, it is necessary to provide a suitably designed storm water drainage system to collect, convey and attenuate any additional runoff that may be generated by the development itself. The net result is that there should be no increase in flood risk either downstream or to any neighbouring properties because of the scheme.
- 17.2. The current proposed layout for the site is included within APPENDIX 2 and shows that there will be an increase in impermeable area as part of this development.
- 17.3. The total site is approximately 1ha in area with the proposed impermeable areas identified accordingly:

Building roofs including 10% urban creep allowance = 1969m²

Proposed impermeable hardstandings = 1875m²

Proposed permeable driveways with overflow = 635m²

- 17.4. For the purpose of this report remaining areas will be either classed as permeable and will be in form of landscaped gardens or rain gardens/ecologically enhances spaces with improved water retention soils and specification of sympathetic broad-leafed plants with high rainfall interception and water demand.
- 17.5. Increase in impermeable areas as a result of the proposed development is likely to generate large amounts of storm water runoff, which without satisfactory collection, attenuation, and controlled discharge, could pose risk to both the development site and the areas downstream.
- 17.6. A preliminary drainage strategy has been undertaken to establish principles of the design for foul and surface water drainage for the proposed development.
- 17.7. All recommendations are subject to detailed design and calculation following further site investigation and consultations with the Lead Local Flood Risk Authority and United Utilities.

Preliminary surface water strategy

- 17.8. All drained areas will be designed to meet the Statutory Requirements as follows:
 - The 1 in 1-year storage will be provided via Source Control SuDS techniques such as rain gardens, tree cells, permeable surfaces to driveways and pathways with overflow to next drainage element.
 - Drainage system will be designed for the critical 100-year (1%) rainfall event with climate change and urban creep allowance, therefore there will be no risk of uncontrolled flooding on site for all rainfall events up 100-year return +40%+10% urban creep.
 - All exceedance flows beyond those for which the drainage system is designed will either infiltrate to ground (rain gardens with improved water retention properties) or will be directed thought the site, as such that there will be no risk of flooding of vulnerable or critical areas and there will be no risk of flows from the site causing flooding to other nearby areas.
- 17.9. Permeable surfaces will be encouraged throughout the development to provide interception and pollution removal, storage within the sub-base layer with an overflow to next element of drainage system i.e., attenuation structures. Due to proposed site levels baffles might be required within permeable subbase storage
- 17.10.All recommendations will be investigated/developed further during the detailed design stage following consultation with Lead Local Flood Risk Authority, United Utilities. Network Rail and further site investigation and surveys.



Client: Treville Properties Ltd Site address: Land west of Bridgemont, SK23 7PB FRA & DRAINAGE STRATEGY

Attenuation storage volume estimation

- 17.11. Based on preliminary site testing undertaken on site and as described with Peak Environmental Solutions report included within APPENDIX 3 opportunities for discharge via infiltration for this site are considered to be limited.
- 17.12. Total contributing areas positively drained including 10% urban creep allowance are approx. 4497m² (0.45ha) as shown on Proposed Surface Water Contributing Area plan in APPENDIX 4.
- 17.13. Permeable surfaces to driveways, parking bays and paths will provide interception and pollution removal at source as well as attenuation within subbase storage layer (30% void) with an overflow to the next element of drainage network. Partial infiltration can be expected in some areas of the site; therefore, an unlined permeable surface system will be proposed. All subject to detailed design and further site investigation.
- 17.14. Runoff from Impermeable areas (roofs including 10% urban creep allowance, access roads and footpaths) will be collected via underground pipe network and directed to attenuation structures (large diameter storage pipes and tanks) for controlled discharged at maximum pass forward rate of 5l/s via vortex flow control (hydrobrake or similar approved).
- 17.15. Due to the site layout and topography, it is proposed to split the drainage strategy into two distinct areas/catchments:
 - upper catchment (majority of the site, impermeable areas 0.4ha) controlled discharge to existing culverted watercourse to the north of the site.
 - lower catchment (units 1 & 2 and small section of low-lying access road and footway at junction with Bridgemont – impermeable area 0.05ha) – controlled discharge to combined public sewer within Bridgemont Road.
- 17.16. All subject to statutory and United Utilities approvals, detailed design, and calculations.
- 17.17. The attenuation volumes in Table 13 (upper catchment) and Table 14 (lower catchment) were calculated using WinDes MicroDrainage software. The storage volumes estimated are indicative only and will be confirmed during detailed design stage. See APPENDIX 7 – MicroDrainage Calculations.

Table 13. Estimated Attenuation Storage Volumes Requirements

Upper Catchment - discharge to watercourse (impermeable area 0.4ha)

	Proposed Discharge Rate Q (litres/sec)	Storage Required Based on contributing areas (0.4ha)	
		V (m3)	V (m3)
YR 1 (100% AEP)	5	22 < V < 42	32
YR 30 (3.3% AEP)	5	81< V < 130	105.50
YR 100 CC (1% AEP + 40%CC +10%UC)	5	150< V < 282	236

- 17.18. The estimated storage volumes will be provided within attenuation structures as follows:
 - 1 in 30-year return period storage (approximately 105.5 m³) to be provided within large diameter pipes under new access road (constructed to adoptable standards). All subject to detailed design following consultation with Lead Local Flood Risk Authority, United Utilities. Network Rail and further site investigation and surveys.



Client: Treville Properties Ltd Site address: Land west of Bridgemont, SK23 7PB

FRA & DRAINAGE STRATEGY

 1 in 100-year return period plus 40% climate change allowance storage, approximate 130.5m³ to be provided within private attenuation storage system (attenuation tank 95% void ratio).

Table 14. Estimated Attenuation Storage Volumes Requirements

Lower Catchment - discharge to combined sewer (impermeable area 0.05ha)

	Proposed Discharge Rate	Based on con	Required stributing areas D5ha)
	Q (litres/sec)	V (m3)	V (m3)
YR 1 (100% AEP)	5	0 < V < 1.4	0.7
YR 30 (3.3% AEP)	5	2.1< V < 6.6.	4.35
YR 100 CC (1% AEP + 40%CC +10%UC)	5	8.1< V < 17	12.55

17.19. The estimated storage volumes will be provided within attenuation structures as follows:

- 1 in 30-year return period storage (approximately 4.35 m³) to be provided within large diameter pipe under new access road (constructed to adoptable standards). All subject to detailed design following consultation with Lead Local Flood Risk Authority, United Utilities. Network Rail and further site investigation and surveys.
- 1 in 100-year return period plus 40% climate change allowance storage, approximate 8m³ to be provided within private attenuation storage system (attenuation tank 95% void ratio).

17.20. Preliminary Drainage Strategy Plan is included within APPENDIX 6.



Water quality

17.21. With reference to water quality, the simple index approach can be used to assess the pre-and post-treatment pollution index (Table 26.2 and 26.3 from CIRIA SuDS Manual)

Area	Pollution hazard level	Pre-Treatment Pollution Index	Attenuation Feature	Mitigation Indices	Sufficient Treatment Provided
Residential Roofs	Very low	Total Suspended Solids = 0.2 Metals = 0.2 Hydrocarbons = 0.05	Proprietary treatment system upstream of site outfall.	Proprietary treatment system will be included as a treatment stage to provide specific measures to remove oils and other pollutants such as heavy metals.	yes
Driveways and shared access road	Low	Total Suspended Solids = 0.5 Metals = 0.4 Hydrocarbons = 0.4	Permeable surfaces	Total Suspended Solids = 0.7 Metals = 0.6 Hydrocarbons = 0.7	yes
Access Road and Footpaths build to adoptable standard	Low	Total Suspended Solids = 0.5 Metals = 0.4 Hydrocarbons = 0.4	Proprietary treatment system of site outfall.	Proprietary treatment system will be included as a treatment stage to provide specific measures to remove oils and other pollutants such as heavy metals.	yes

Proprietary treatment systems (including catch pits and interceptors where applicable) will be specified at the detailed design stage to address each of the contaminant types to acceptable levels for frequent events up to approximately the 1 in 1 year return period event, for inflow concentration relevant to the contributing drainage area.



18 FOUL WATER DRAINAGE STRATEGY

Proposed outfall

18.1. Proposed outfall details: 225mm dia combined public sewer within Bridgemont.

2300 CL =163.66 OAD - TBC IL = 160.54 AOD - TBC Depth to invert = 3.12m - TBC

Proposed foul water rates

18.2. Design and Construction Guidance for foul and surface water sewers offered for adoption under the Code for adoption agreements for water and sewerage companies operating wholly or mainly in England ("the Code") recommends that drainage designs for residential developments should be based on 4000 litres per dwelling per day.

Q Foul Water (litres) = 4000 litres per dwelling per day Proposed Dwellings = 38 Q Foul Water (I per day) = $38 \times 4000 = 152,000$ litres Q Foul Water (I/s) = $152,000 \div (24 \times 60 \times 60) = 1.8$ l/s

- 18.3. The proposed flow rate and outfall is subject to agreement with United Utilities.
- 18.4. Any proposed drainage will be designed in accordance with Building Regulations Document H1 and British Standards and where intended for adoption in accordance with "the Code".v.2.1 May 2021.



EXECUTIVE SUMMARY

- 18.5. The proposed residential development lies within Flood Zone 1, there is no requirement to satisfy either the Sequential Test or the Exception Test.
- 18.6. Sources of flooding have been assessed as part of the Drainage Strategy for the proposed development in its current context. Flood Risk Overview established that northern part of the site is at risk of being affected in the event of reservoir failure, although the risk is considered by The Environment Agency to be very low.
- 18.7. Low to moderate risk of groundwater flooding was identified and possible mitigation measure discussed in paragraph 9.8.
- 18.8. The existing low to moderate risks of pluvial flooding within the vicinity of the site, within Bridgemont will remain after development, however, as the new residential development will have a properly designed drainage system, it is not envisaged that there will be an increased risk of flooding as a result of the development.
- 18.9. Thresholds drain to doors or minimum 150 mm raised door threshold should be utilised throughout the application site as well as flood resilient construction measures should be implemented in low lying areas (unit 1 &2).
- 18.10. An indicative surface water drainage strategy has been prepared in July 2020 as part of the Cole Easdon Consultants FRA report QMF09.20 proposing attenuation within a tanked permeable paving SuDS system, cascaded to suit the topography of the site with overflow to combined public sewer in Bridgemont.
- 18.11. Following Network Rail comments (included in Appendix 8) and initial LLFA comments, HBL Associates Ltd was instructed to provide an updated FRA and alternative drainage strategy considering opportunities for disposal via infiltration and/ or discharge to nearby watercourse.
- 18.12. BGS infiltration SuDS GeoReprt BGS 317107/21928 (included in Appendix 3) indicated opportunities for bespoke infiltration SuDS, however, preliminary trial pitting carried out in November 2021 identified cohesive clayey ground at very shallow depth, with resting water levels (in early winter 5-8th November 2021) at around 1.5 mbgl.
- 13.9. Based on the preliminary trial testing undertaken on site and as described in Peak Solution Environmental Report ref: 42056R4 Rev.A included in Appendix 3, it is considered that soils characteristics on site do not present opportunities for discharge via total infiltration.
- 18.13. Lined and unlined permeable surfaces (where appropriate) will be encouraged throughout the development within private access road and drives, providing interception and pollution removal, attenuation storage within the sub-base storage layer with an overflow to downstream drainage structure.
- 18.14. A preliminary drainage strategy was produced, and attenuation volumes calculated using the source control module of MicroDrainage.
- 18.15. Due to the site layout and topography, it is currently proposed to split the drainage strategy into two distinct areas:
 - upper catchment (majority of the site, impermeable areas 0.4ha) controlled discharge to existing culverted watercourse to the north of the site at maximum pass forward rate of 5l/s for all return periods including critical 1 in 100-year event + 40% climate change.
 - o 1 in 30-year return period storage (approximately 105.5 m³) to be provided within large diameter pipes under new access road (constructed to adoptable standards).



Client: Treville Properties Ltd

Site address: Land west of Bridgemont, SK23 7PB

FRA & DRAINAGE STRATEGY

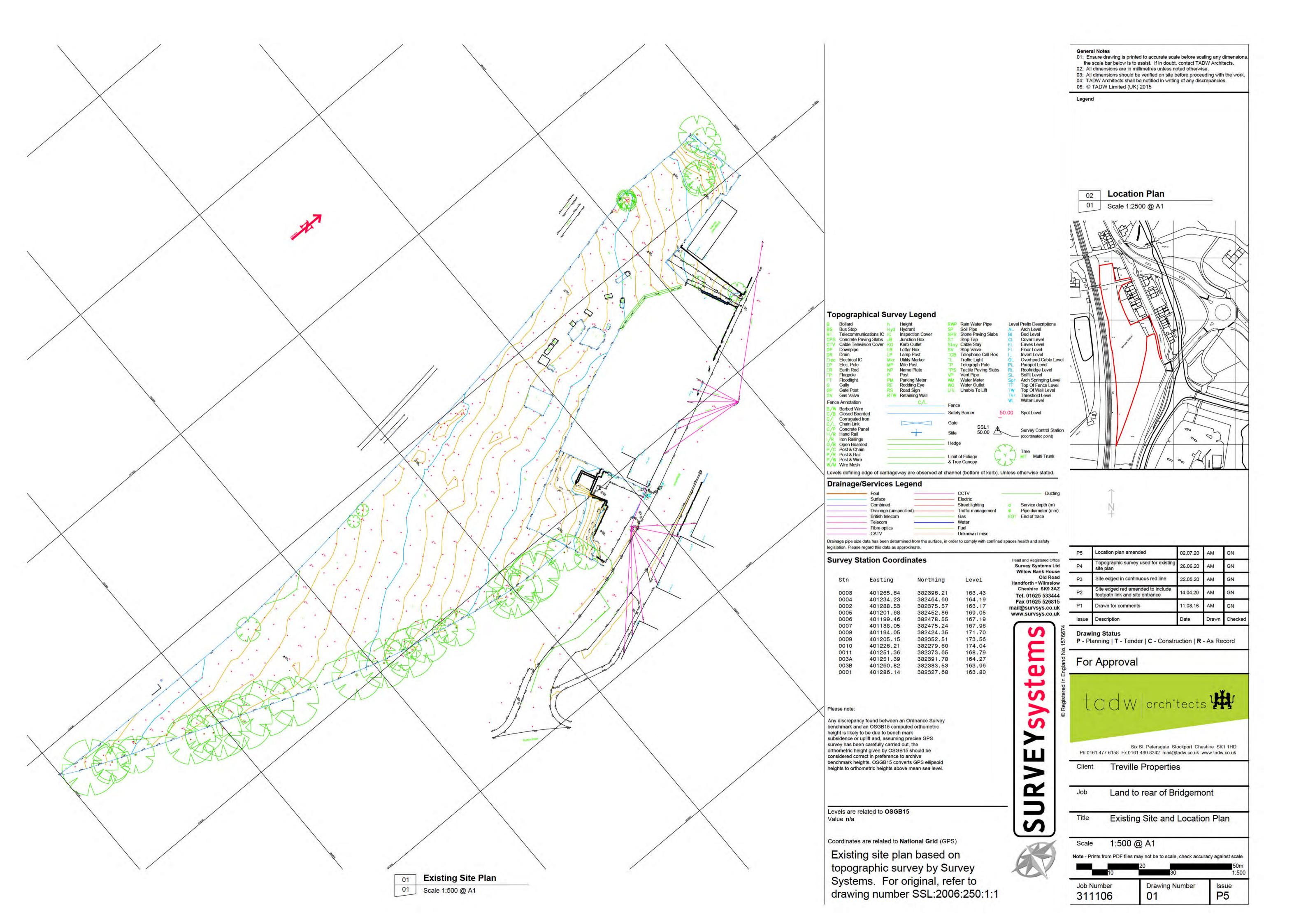
- 1 in 100-year return period plus 40% climate change allowance storage, approximate 130.5m³
 to be provided within private attenuation storage system (attenuation tank 95% void ratio).
- lower catchment (units 1 & 2 and small section of low-lying access road and footway at junction with Bridgemont – impermeable area 0.05ha) - controlled discharge to 225mm dia combined public sewer within Bridgemont at maximum pass forward rate of 5l/s for all return periods including critical 1 in 100-year event +40% climate change.
 - o 1 in 30-year return period storage (approximately 4.35 m³) to be provided within large diameter pipe under new access road (constructed to adoptable standards).
 - 1 in 100-year return period plus 40% climate change allowance storage, approximate 8m³ to be provided within private attenuation storage system (attenuation tank 95% void ratio).
- 18.16. Preliminary Drainage Strategy Plan is included within APPENDIX 6.
- 18.17. Silt chambers should be installed upstream of all attenuation to prevent siltation of attenuation structures and downstream network. All channel drains should be installed with build in sump units.
- 18.18. Drainage design considers flows resulting from rainfall in excess of the 1 in 100-year rainfall event plus 40% climate change. Site surfaces will be modelled so that flood flows generated on site from events beyond the stipulated drainage design criteria will flow away from buildings and other sensitive areas and will be contained on site as reasonably practicable.
- 18.19. Detailed drainage design and calculations will be prepared at detailed design stage, following LLFA, United Utilities and Network Rail consultations and further site investigation and testing.
- 18.20. Foul drainage is proposed to be discharged to the combined surface water sewer in Bridgemont at estimated rate of 1.8 l/s estimated based on 4000 litres per dwelling per day as per "the CODE" v.2.1 guidance.
- 18.21. Any proposed on-site drainage should be designed and constructed in accordance with current Building Regulation and best practice.
- 18.22. Drainage network within any road should be constructed to adoptable standards.
- 18.23. All SuDS on site should be designed and installed with full consideration to long term maintenance. Typical maintenance schedule has been prepared to accompany this report, however, as part of the detailed design process consideration should also be given to the maintenance requirements of the drainage system and information relating to this included with any supporting information provided at handover.
- 18.24. Private management company will be set up to provide ongoing maintenance for the site drainage for longevity of the development.
- 18.25. This Flood Risk Assessment has demonstrated that either by assessment or by design as part of the development, all residual flood risks to the development on site are considered to be low and there will be no significant off-site impacts as a result of this development, therefore the proposal satisfies paragraph 103 of the Framework.



FRA & DRAINAGE STRATEGY

APPENDIX 1 - TOPOGRAPHICAL SURVEY

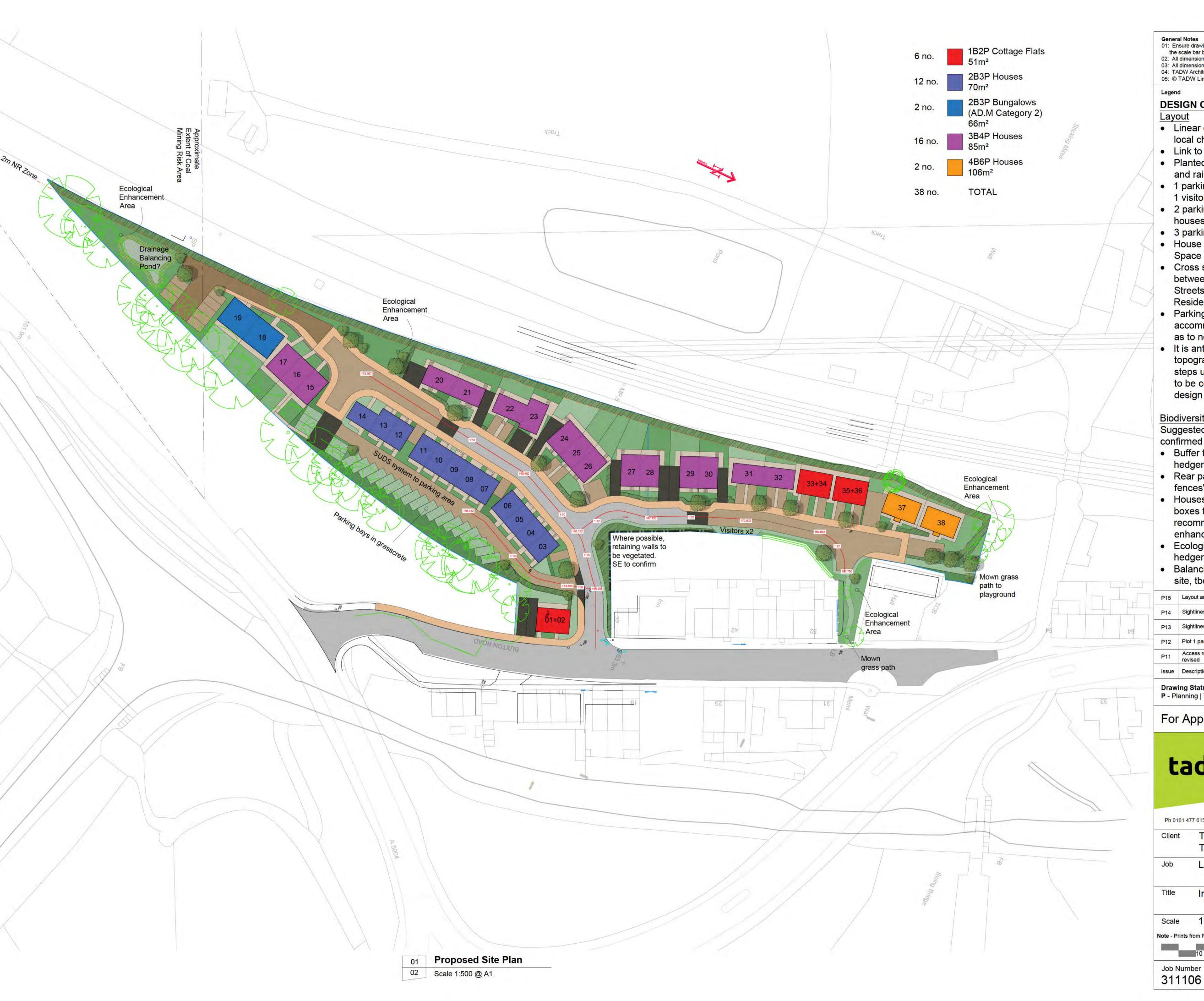




FRA & DRAINAGE STRATEGY

APPENDIX 2 - PROPOSED SITE PLAN - Option 1





01: Ensure drawing is printed to accurate scale before scaling any dimensions, the scale bar below is to assist. If in doubt, contact TADW Architects.

03: All dimensions should be verified on site before proceeding with the work.
04: TADW Architects shall be notified in writing of any discrepancies.
05: TADW Limited (UK) 2015

DESIGN CONSIDERATIONS

Layout

- Linear development pattern reinforces local character.
- Link to Playground
- Planted buffer zone between housing and railway line
- 1 parking space per 1 bed flat, plus min. 1 visitor space per 2 flats
- 2 parking spaces per 2 and 3 bed houses
- 3 parking spaces per 4 bed house
- House types are to Nationally Described Space Standards
- Cross street interface distances vary between 12-18m as per Manual for Streets recommendations for Residential Streets.
- Parking is predominantly accommodated in discrete locations so as to not dominate the layout
- It is anticipated that, due to the topography, some properties will have steps up to their front doors. Full extent to be confirmed following detailed levels design in conjunction with SE.

Biodiversity

Suggested enhancements, all to be confirmed by suitably qualified ecologist

- Buffer to railway line to be native hedgerow
- Rear party fence lines to be 'living
- Houses to incorporate bird and bat boxes to meet ecologist recommendations for biodiversity enhancement
- Ecological enhancement areas linked by
- Balancing pond at southern corner of site, tbc by SE

P15	Layout and housing mix revised	28.09.21	AM	AM
P14	Sightlines amended	15.01.21	AM	GN
P13	Sightlines shown	11.12.20	AM	GN
P12	Plot 1 parking amended	10.12.20	AM	GN
P11	Access road and plots 1 and 2 revised	09.09.20	AM	GN
Issue	Description	Date	Drawn	Checked

Drawing Status
P - Planning | T - Tender | C - Construction | R - As Record

For Approval



Six St. Petersgate Stockport Cheshire SK1 1HD Ph 0161 477 6158 Fx 0161 480 8342 mail@tadw.co.uk www.tadw.co.uk

Treville Properties with The Guinness Partnership

Land to rear of Bridgemont

Indicative Site Plan

1:500 @ A1

Note - Prints from PDF files may not be to scale, check accuracy against scale

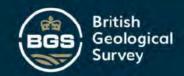
Drawing Number Job Number Issue P15 02

FRA & DRAINAGE STRATEGY

APPENDIX 3 - BGS infiltration SuDS GeoReport BGS 317107/21928



GeoReports



PART 1: SUMMARY DATA

This section provides a summary of the data.

In terms of the drainage potential, is the ground suitable for infiltration SuDS? Highly compatible for infiltration SuDS. The subsurface is likely to be suitable for free-draining infiltration SuDS. Probably compatible for infiltration SuDS. The Bridgemont subsurface is probably suitable although the design may be influenced by the ground conditions. Opportunities for bespoke infiltration SuDS. The Hockerley subsurface is potentially suitable although the design will be influenced by the ground conditions. Very significant constraints are indicated. There is a Contains OS data @ Crown Copyright and very significant potential for one or more hazards database right 2021 associated with infiltration. Is ground instability likely to be a problem? Increased infiltration is very unlikely to result in ground instability. Ground instability problems may be present or Bridgemon anticipated, but increased infiltration is unlikely to result in ground instability. Ground instability problems are probably present. Hockerley Increased infiltration may result in ground instability. There is a very significant potential for one or more geohazards associated with infiltration. Contains OS data © Crown Copyright and Is the groundwater susceptible to deterioration in quality? The groundwater is not expected to be especially vulnerable to contamination. The groundwater may be vulnerable to contamination. Bridgemont The groundwater is likely to be vulnerable to contaminants. Hockerley Made ground is present at the surface. Infiltration may increase the possibility of remobilising pollutants. Contains OS data @ Crown Copyright and database right 2021





29th November 2021 Our Ref: 42056R4/Issued/Rev-A

PDF BY EMAIL ONLY

Treville Properties Limited



Dear Treville Properties Limited,

COMPILED INFORMATION: PRELIMINARY TRIAL PITTING FOR INFILTRATION TESTING PURPOSES LAND AT BRIDGEMONT, WHALEY BRIDGE, DERBYSHIRE, SK23 7PB

This letter compiles information provided to Peak Environmental Solutions Limited (PESL) by Treville Properties Limited for some trial pitting undertaken by Treville Properties at a ~1 hectare proposed residential development plot located to the rear of Bridgemont, Whaley Bridge, Derbyshire, SK23 7PB ('the site').

The trial pitting was undertaken to assist the drainage design team in establishing whether the shallow/near-surface (<2m) soil/groundwater conditions could be considered suitable/amenable enough for further BRE365 compliant infiltration testing for soakaway/SUDS design purposes.

On the 4th November 2021, Treville Properties excavated three initial trial pits with an excavator to depths of 1.0m to 1.5m at the eastern end of the site, close to Bridgemont; this represents a lower (elevation) part of the site where soakaways might be considered to be used, if ground conditions were suitable. These trial pits were observed by Treville Properties to be into cohesive (clayey) ground at very shallow depth and the pits were observed to fill with shallow groundwater. Photos of these initial trial pits, taken by Treville Properties, are attached.

On the 6th November 2021, Treville Properties deepened the trial pits to c. 2m and installed a perforated pipe to allow for groundwater monitoring; the trial pits were backfilled with arisings around the pipework. Photos of these installations are attached.

On the 8th November 2021, Treville Properties measured water levels in the perforated pipework to be at a depth of around 1.5m. Photos are attached.

In summary, cohesive clayey ground has been identified at very shallow depth, with resting water levels (in early winter) at around 1.5 mbgl. This site information should be of use to the drainage design team.

We trust that you will find this letter report acceptable for your needs.

Yours sincerely,

For and on behalf of Peak Environmental Solutions Limited



Technical Director





























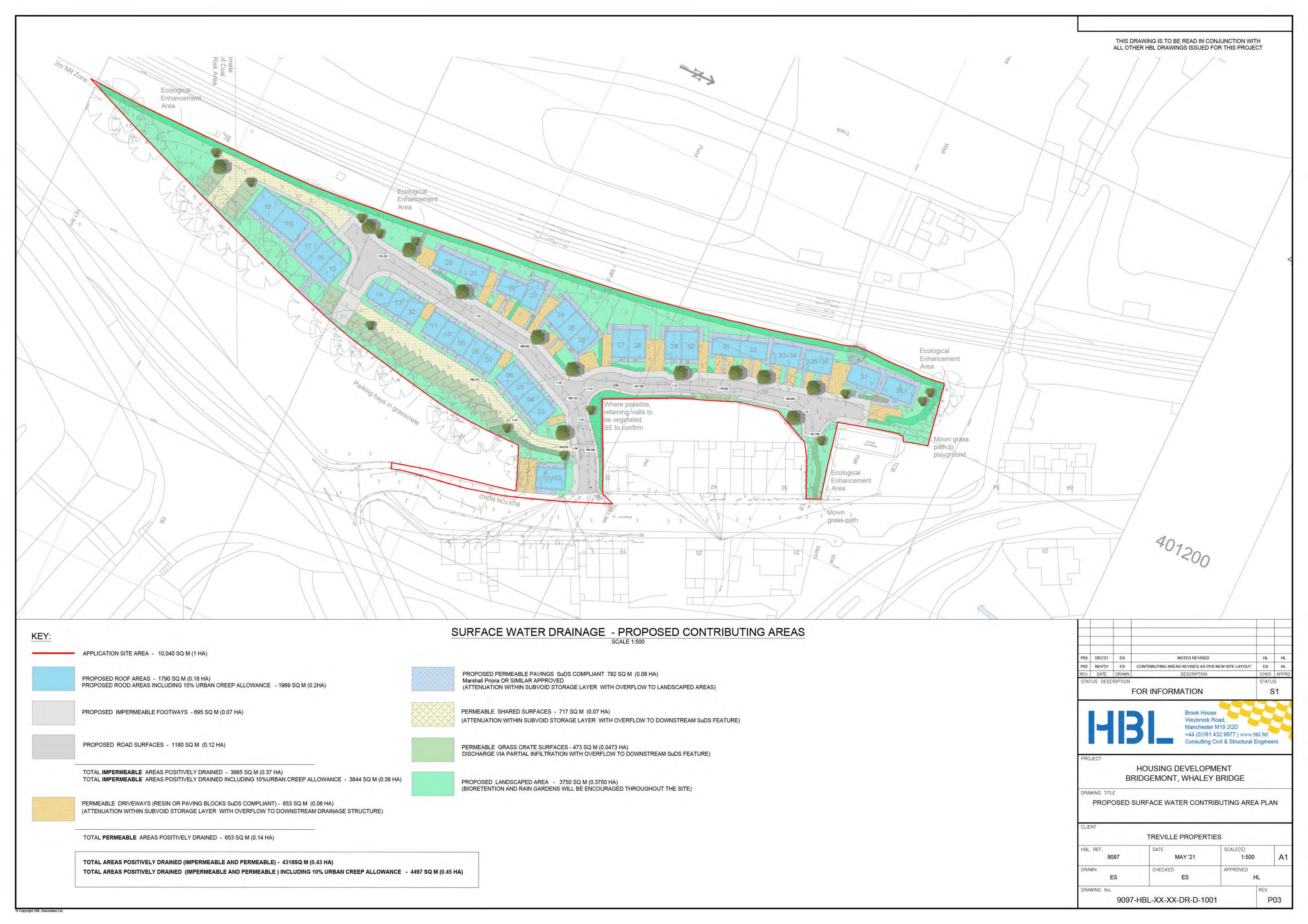






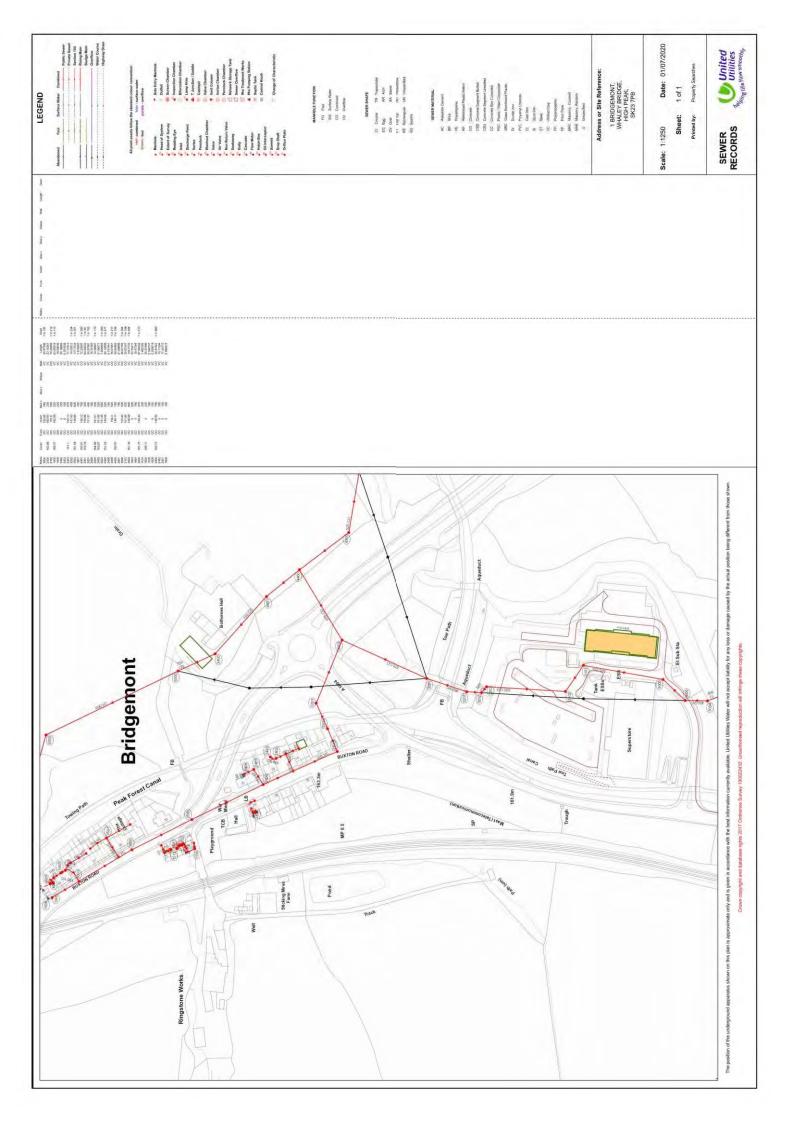
APPENDIX 4 - PROPOSED CONTRIBUTING AREAS PLAN





APPENDIX 5 - SEWER RECORDS / UU CONSULTATIONS







United Utilities Water Limited Planning, Landscape and Ecology 2nd Floor, Grasmere House Lingley Mere Business Park Lingley Green Avenue Warrington WA5 3LP

Planning.liaison@uuplc.co.uk

High Peak Borough Council Municipal Buildings Glossop Derbyshire SK13 8AF Your ref: HPK/2020/0180 Our ref: DC/20/2847 Date: 25-AUG-20

Dear Sir/Madam,

Location: Land At Bridgemont, Bridgemont, Whaley Bridge, Derbyshire,

Proposal: Application for Outline Planning Permission with details of access (all other matters

reserved) for for 46No affordable dwellings

With regards to the above development proposal, United Utilities Water Limited ('United Utilities') wishes to provide the following comments.

Drainage

In accordance with the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG), the site should be drained on a separate system with foul water draining to the public sewer and surface water draining in the most sustainable way.

We request the following drainage conditions are attached to any subsequent approval to reflect the above approach:

Condition 1 – Surface water

No development shall commence until a surface water drainage scheme has been submitted to and approved in writing by the Local Planning Authority. The drainage scheme must include:

- (i) An investigation of the hierarchy of drainage options in the National Planning Practice Guidance (or any subsequent amendment thereof). This investigation shall include evidence of an assessment of ground conditions and the potential for infiltration of surface water;
- (ii) A restricted rate of discharge of surface water agreed with the local planning authority (if it is agreed that infiltration is discounted by the investigations); and
- (iii) A timetable for its implementation.

The approved scheme shall also be in accordance with the Non-Statutory Technical Standards for Sustainable Drainage Systems (March 2015) or any subsequent replacement national standards.

The development hereby permitted shall be carried out only in accordance with the approved drainage scheme.

Reason: To promote sustainable development, secure proper drainage and to manage the risk of flooding and pollution.

Condition 2 – Foul water

Foul and surface water shall be drained on separate systems.

Reason: To secure proper drainage and to manage the risk of flooding and pollution.

The applicant can discuss any of the above with Developer Engineer, **Daniel McDermott**, by email at wastewaterdeveloperservices@uuplc.co.uk.

Please note, United Utilities are not responsible for advising on rates of discharge to the local watercourse system. This is a matter for discussion with the Lead Local Flood Authority and / or the Environment Agency (if the watercourse is classified as main river).

If the applicant intends to offer wastewater assets forward for adoption by United Utilities, the proposed detailed design will be subject to a technical appraisal by an Adoptions Engineer as we need to be sure that the proposal meets the requirements of Sewers for Adoption and United Utilities' Asset Standards. The detailed layout should be prepared with consideration of what is necessary to secure a development to an adoptable standard. This is important as drainage design can be a key determining factor of site levels and layout. The proposed design should give consideration to long term operability and give United Utilities a cost effective proposal for the life of the assets. Therefore, should this application be approved and the applicant wishes to progress a Section 104 agreement, we strongly recommend that no construction commences until the detailed drainage design, submitted as part of the Section 104 agreement, has been assessed and accepted in writing by United Utilities. Any works carried out prior to the technical assessment being approved is done entirely at the developers own risk and could be subject to change.

Management and Maintenance of Sustainable Drainage Systems

Without effective management and maintenance, sustainable drainage systems can fail or become ineffective. As a provider of wastewater services, we believe we have a duty to advise the Local Planning Authority of this potential risk to ensure the longevity of the surface water drainage system and the service it provides to people. We also wish to minimise the risk of a sustainable drainage system having a detrimental impact on the public sewer network should the two systems interact. We therefore recommend the Local Planning Authority include a condition in their Decision Notice regarding a management and maintenance regime for any sustainable drainage system that is included as part of the proposed development.

For schemes of 10 or more units and other major development, we recommend the Local Planning Authority consults with the Lead Local Flood Authority regarding the exact wording of any condition. You may find the below a useful example:

Prior to occupation of the development a sustainable drainage management and maintenance plan for the lifetime of the development shall be submitted to the local planning authority and agreed in writing. The sustainable drainage management and maintenance plan shall include as a minimum:

- a. Arrangements for adoption by an appropriate public body or statutory undertaker, or, management and maintenance by a resident's management company; and
- b. Arrangements for inspection and ongoing maintenance of all elements of the sustainable drainage system to secure the operation of the surface water drainage scheme throughout its lifetime.

The development shall subsequently be completed, maintained and managed in accordance with the approved plan.

Reason: To ensure that management arrangements are in place for the sustainable drainage system in order to manage the risk of flooding and pollution during the lifetime of the development.

Please note United Utilities cannot provide comment on the management and maintenance of an asset that is owned by a third party management and maintenance company. We would not be involved in the discharge of the management and maintenance condition in these circumstances.

Water Supply

We can readily supply water for domestic purposes, but for larger quantities for example, commercial/industrial we will need further information.

Modelling may be required to determine if network reinforcement is needed.

The applicant should be instructed to lay their own private pipe, to United Utilities standards, back to the existing main. If this should involve passing through third party land United Utilities must receive a solicitor's letter confirming an easement, prior to connection.

The applicant must undertake a complete soil survey, as and when land proposals have progressed to a scheme design i.e. development, and results submitted along with an application for water. This will aid in our design of future pipework and materials to eliminate the risk of contamination to the local water supply.

If the applicant intends to obtain a water supply from United Utilities for the proposed development, we strongly recommend they engage with us at the earliest opportunity. If reinforcement of the water network is required to meet the demand, this could be a significant project and the design and construction period should be accounted for.

To discuss a potential water supply or any of the water comments detailed above, the applicant can contact the team at **DeveloperServicesWater@uuplc.co.uk**.

Please note, all internal pipework must comply with current Water Supply (water fittings) Regulations 1999.

United Utilities' Property, Assets and Infrastructure

Where United Utilities' assets exist, the level of cover to the water mains and public sewers must not be compromised either during or after construction.

For advice regarding protection of United Utilities assets, the applicant should contact the teams as follows:

Water assets – <u>DeveloperServicesWater@uuplc.co.uk</u>
Wastewater assets – WastewaterDeveloperServices@uuplc.co.uk

It is the applicant's responsibility to investigate the possibility of any United Utilities' assets potentially impacted by their proposals and to demonstrate the exact relationship between any United Utilities' assets and the proposed development.

A number of providers offer a paid for mapping service including United Utilities. To find out how to purchase a sewer and water plan from United Utilities, please visit the Property Searches website; https://www.unitedutilities.com/property-searches/

You can also view the plans for free. To make an appointment to view our sewer records at your local authority please contact them direct, alternatively if you wish to view the water and the sewer records at our Lingley Mere offices based in Warrington please ring <u>0370 751 0101</u> to book an appointment.

Due to the public sewer transfer in 2011, not all sewers are currently shown on the statutory sewer records and we do not always show private pipes on our plans. If a sewer is discovered during construction; please contact a Building Control Body to discuss the matter further.

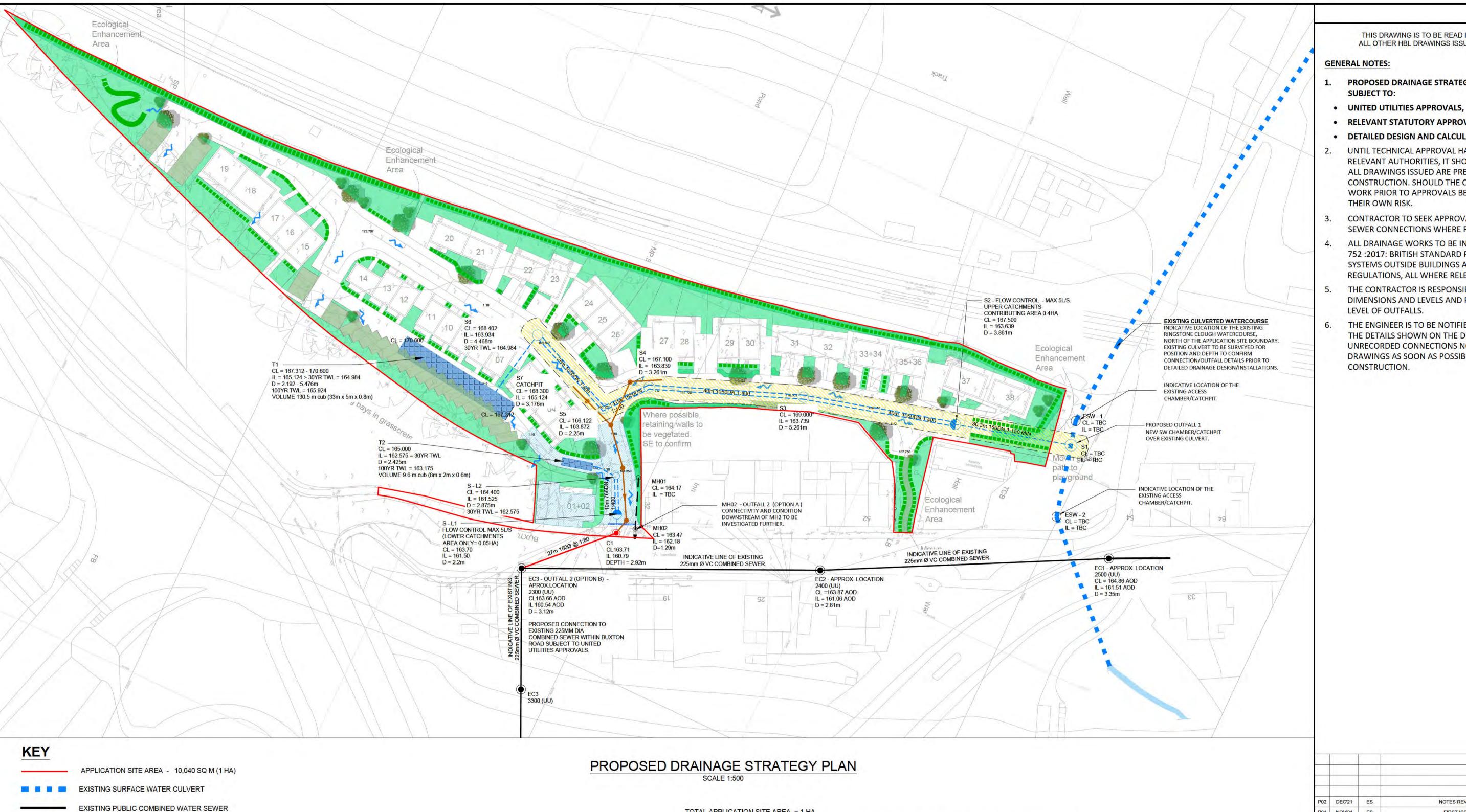
Should this planning application be approved the applicant should contact United Utilities regarding a potential water supply or connection to public sewers. Additional information is available on our website http://www.unitedutilities.com/builders-developers.aspx

Yours faithfully

Jill Walker United Utilities Planning, Landscape and Ecology

APPENDIX 6 - PROPOSED DRAINAGE STRATEGY PLAN.





THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL OTHER HBL DRAWINGS ISSUED FOR THIS PROJECT

GENERAL NOTES:

- PROPOSED DRAINAGE STRATEGY PLAN IS INDICATIVE ONLY, SUBJECT TO:
- RELEVANT STATUTORY APPROVALS,
- DETAILED DESIGN AND CALCULATIONS,
- 2. UNTIL TECHNICAL APPROVAL HAS BEEN OBTAINED FROM THE RELEVANT AUTHORITIES, IT SHOULD BE UNDERSTOOD THAT ALL DRAWINGS ISSUED ARE PRELIMINARY AND NOT FOR CONSTRUCTION. SHOULD THE CONTRACTOR COMMENCE SITE WORK PRIOR TO APPROVALS BEING GIVEN, IT IS ENTIRELY AT THEIR OWN RISK.
- CONTRACTOR TO SEEK APPROVAL / APPLY FOR ALL NEW SEWER CONNECTIONS WHERE REQUIRED.
- ALL DRAINAGE WORKS TO BE IN ACCORDANCE WITH BS EN 752:2017: BRITISH STANDARD FOR DRAIN AND SEWER SYSTEMS OUTSIDE BUILDINGS AND THE BUILDING REGULATIONS, ALL WHERE RELEVANT.
- THE CONTRACTOR IS RESPONSIBLE FOR CHECKING DIMENSIONS AND LEVELS AND FOR CONFIRMING THE GIVEN LEVEL OF OUTFALLS.
- THE ENGINEER IS TO BE NOTIFIED OF ANY DISCREPANCIES TO THE DETAILS SHOWN ON THE DRAINAGE PLAN AND ANY UNRECORDED CONNECTIONS NOT SHOWN ON THE DRAWINGS AS SOON AS POSSIBLE AND PRIOR TO CONSTRUCTION.

TOTAL APPLICATION SITE AREA = 1 HA

TOTAL PROPOSED CONTRIBUTING AREAS POSITIVELY DRAINED (INCLUDING 10% URBAN CREEP ALLOWANCE) = 0.45HA

• UPPER CATCHMENTS AREAS WITH CONTROLLED DISCHARGE AT 5L/S TO SW CULVERT (WATERCOURSE) = 0.40 HA • LOWER CATCHMENTS AREA WITH PROPOSED CONTROLLED DISCHARGE AT 5L/S. TO COMBINED PUBLIC SEWER IN BUXTON ROAD = 0.05HA

DRAINAGE STRATEGY PARAMETERS:

- RUNOFF FROM UPPER CATCHMENTS AREA (0.4HA) WILL BE ATTENUATED AND DISCHARGED TO EXISTING CULVERTED WATERCOURSE (OUTFALL 1 THE NORTH OF THE APPLICATION SITE) AT CONTROLLED DISCHARGE RATE OF 5 L/S VIA VORTEX FLOW CONTROL (HYDROBRAKE OR SIMILAR APPROVED).
 - •• 1 IN 30 YEAR RETURN PERIOD STORAGE (APPROXIMATE 105.5 m³) TO BE PROVIDED WITHIN LARGE DIAMETER PIPES UNDER NEW ACCESS ROAD (CONSTRUCTED TO ADOPTABLE STANARD, SUBJECT TO DETAILED DESIGN AND APPROVALS).
- •• 1 IN 100YR RETURN PERIOD STORAGE PLUS 40% CLIMATE CHANGE ALLOWANCE (APPROXIMATE 130.5m³) TO BE PROVIDED WITHIN PRIVATE ATTENUATION STORAGE SYSTEM (ATTENUATION TANK -T1, 95% VOID RATIO) MAINTAINED BY PRIVATE BUILDING MAINTENANCE COMPANY.
- RUNOFF FROM LOWER CATCHMENTS AREA (0.05HA) WILL BE ATTENUATED AND DISCHARGED TO EXISTING 225mm COMBINED WATER PUBLIC SEWER WITHIN BUXTON ROAD (OUTFALL 2 TO EXISTING MH02 OR NEW CONNECTION AS SHOWN VIA PROPOSED DEMARCATION MH C1). SW TO MAX PASS FORWARD RATE TO BE 5 L/S VIA VORTEX FLOW CONTROL (HYDROBRAKE OR SIMILAR APPROVED).
- •• 1 IN 30 YEAR RETURN PERIOD STORAGE (APPROXIMATE 4.5 m³) TO BE PROVIDED WITHIN LARGE DIAMETER PIPE UNDER NEW ACCESS ROAD (CONSTRUCTED TO ADOPTABLE STANDARD, SUBJECT TO DETAILED DESIGN AND APPROVALS).
- •• 1 IN 100YR RETURN PERIOD STORAGE PLUS 40% CLIMATE CHANGE ALLOWANCE (APPROXIMATE 8 m³) TO BE PROVIDED WITHIN PRIVATE ATTENUATION STORAGE SYSTEM (ATTENUATION TANK - T2, 95% VOID RATIO) MAINTAINED BY PRIVATE BUILDING MAINTENANCE COMPANY.
- FURTHER ATTENUATION STORAGE WILL BE PROVIDED WITHIN VOIDS OF SUB-BASE LAYER OF PROPOSED PERMEABLE SURFACES.
- PRELIMINARY TRIAL PITTING IDENTIFIED COHESIVE CLAYEY GROUND AT VERY SHALLOW DEPTH, WITH RESTING WATER LEVELS (IN EARLY WINTER) AT AROUND 1.5 MBGL. DISPOSAL VIA TOTAL INFILTRATION IS NOT SUITABLE FOR THIS SITE. UNLINED PERMEABLE SURFACES ARE PROPOSED TO AID IN INTERCEPTION AND ATTENUATION AT
- ATTENUATION STORAGE VOLUMES AND DRAINAGE NETWORK SHOWN ON THIS PLAN ARE INDICATIVE ONLY, SUBJECT TO STATUTORY AND UNITED UTILITIES APPROVALS, CONFIRMATION/SURVEY OF PROPOSED OUTFALLS, DETAILED DESIGN AND CALCULATIONS.

NOTES REVISED HL HL P01 NOV'21 ES FIRST ISSUE ES HL REV. DATE DRAWN DESCRIPTION CHKD APPRI STATUS DESCRIPTION STATUS S1 FOR INFORMATION

Brook House Weybrook Road, Manchester M19 2QD +44 (0)161 432 9977 | www.hbl.ltd Consulting Civil & Structural Engineers

HOUSING DEVELOPMENT

BRIDGEMONT, WHALEY BRIDGE

DRAWING TITLE

PROJECT

PROPOSED DRAINAGE STRATEGY PLAN

### TREVILLE PROPERTIES HBL REF. DATE SCALE(S) 9097 NOV '21 1:500	
	A1
DRAWN CHECKED APPROVED HL	

EXISTING COMBINED ACCESS CHAMBER

PROPOSED SURFACE WATER DRAIN

PROPOSED CHANNEL DRAIN

PROPOSED FOUL WATER DRAIN

EXCEEDENCE FLOW DIRECTION

EXISTING SURFACE WATER ACCESS CHAMBER

EXISTING DRAIN DESIGNATION AND CONNECTIVITY TBC

PROPOSED SURFACE WATER INSPECTION CHAMBER

PROPOSED FOUL WATER INSPECTION CHAMBER

PROPOSED COMBINED WATER INSPECTION CHAMBER

PROPOSED COMBINED WATER INSPECTION CHAMBER

PROPOSED SURFACE WATER ATTENUATION STORAGE

LOWER CATCHMENTS AREA (INDICATIVE) = 500 SQ M = 0.05 HA

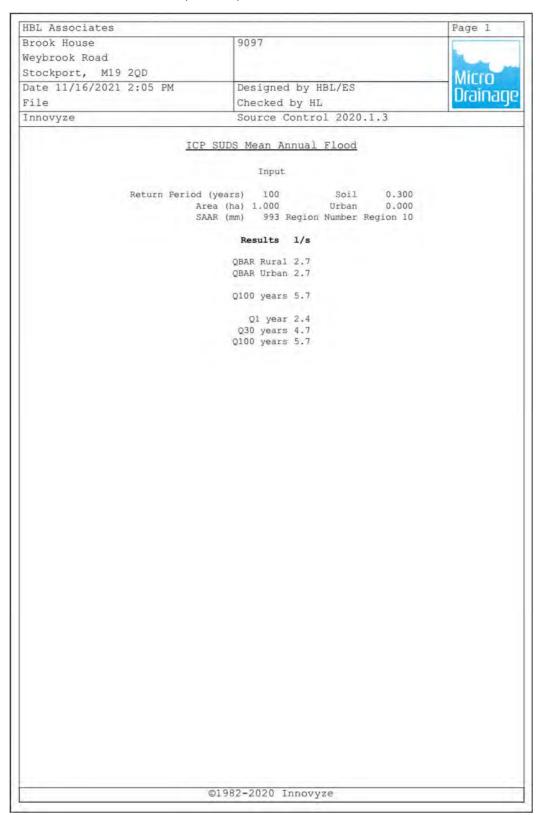
6m PROTECTIVE STRIP SHOWN INDICATIVELY (3M EACH SIDE OF PIPE CENTERLINE)

FINAL WIDTH/EXTENT TO BE CONFIRMED DURING DETAILED DESIGN STAGE

PROPOSE RAIN GARDENS /BIORETENTION PLANTING

APPENDIX 7 - HYDRAULIC CALCULATIONS

Greenfield runoff rate - soil 2 (SPR 0.3)





Site address: Land west of Bridgemont, SK23 7PB

FRA & DRAINAGE STRATEGY

Greenfield runoff rate – soil 2 (SPR 0.3) & soil 3 (SPR 0.37)

							e	stimation for site
						wwv	v.uksuds.com	Greenfield runoff to
Calculated by:	HBL L	TD					Site Details	
Site name:	9097						Latitude:	53.33819° N
Site location:	SK23 7	7PB					Longitude:	1.9831° W
line with Environmen (2013) , the SuDS M	t Agency gu anual C753	uidance " (Ciria, 2	'Rainfall rur 015) and th	noff mana ne non-si	agement for dev tatutory standar	mal best practice criteria in relopments", SC030219 ds for SuDS (Defra, 2015). ents for the drainage of	Reference:	279392302 Dec 06 2021 16:11
surface water runoff			,			one no orange or		
Runoff estimat	ion appr	oach	IH124					
Site characteri	stics					Notes		
Total site area (ha	a): 1					(1) Is Q _{BAR} < 2.0 I/s/ha?		
Methodology								
Q _{BAR} estimation				and SAAR	When Q _{BAR} is < 2.0 l/s/ha then limiting discharge rates a at 2.0 l/s/ha.		ng discharge rates are set	
SPR estimation r		Default Edited			at 2.0 //5/11a.			
Soil characteri	stics	Defau	iit	Edite	d			
SOIL type:	2	2		3		(2) Are flow rates < 5.0 l/s?		
HOST class:	1	N/A				Where flow rates are less than 5.0 l/s consent for discharge is usually set at 5.0 l/s if blockage from vegetation and other		
SPR/SPRHOST:	(0.3						
Hydrological c	haracter	istics	Defa	ault	Edited			flow rates may be set I by using appropriate
SAAR (mm):			1092		1092	drainage element	and the second second	by using appropriate
Hydrological region:		10		10	(0) 1- 000 (000)	007 - 000		
Growth curve factor 1 year:		0.87		0.87	(3) Is SPR/SPRH	OS1 ≤ 0.3?		
Growth curve factor 30 years: Growth curve factor 100 years: Growth curve factor 200 years:		1.7		1.7	Where groundwa	groundwater levels are low enough the use of ways to avoid discharge offsite would normally be ad for disposal of surface water runoff.		
				2.08				
		ears:	2.37		2.37	prototred for disp	preferred for disposal of surface water furion.	
Greenfield run	off rates	D	efault	E	Edited			
Q _{BAR} (I/s):		3.07	7	4.8	3			
1 in 1 year (l/s):		2.67	7	4.2	1			
1 in 30 years (l/s)	:	5.2	1	8.2	2			
1 in 100 year (l/s):	6.38		10.05				
1 in 200 years (V								
Loo Jouro (7.27		11.46				

this tool. No liability will be accepted by HR Wallingford, the Environment Agency, CEH, Hydrosolutions or any other organisation for the use

of this data in the design or operational characteristics of any drainage scheme.



Greenfiel runoff volume – soil 2 (SPR 0.3)

HBL Associates			Page 1
Brook House	9097		
Weybrook Road	BRIDGEMONT		
Stockport, M19 2QD			Micco
Date 19-May-21 1:26 PM	Designed by	HBL/ES	Micro
File	Checked by		Drainage
Innovyze		rol 2020.1.3	
Retur	Greenfield Runoff FSR Data on Period (years) Duration (mins)	100 360 land and Wales 18.000	
Green	Fercentage Runoff nfield Runoff Volume		



Greenfiel runoff volume – soil 3 (SPR 0.37)

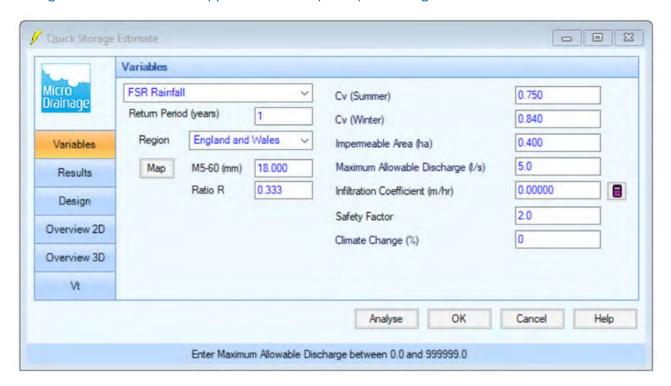
HBL Associates Brook House	9097		Page 1
	9097		
Weybrook Road			
Stockport, M19 2QD		P1	Micro
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nnovyze	Source Conti	rol 2020.1.3	
		200	
<u>G</u>	reenfield Runoff	Volume	
	FSR Data		
	Period (years)	100	
Storm !	Duration (mins)	360	
		and and Wales	
	M5-60 (mm)		
3 mg - 1 70	Ratio R eduction Factor	0.330	
Areal Ro	Area (ha)	1.00	
	SAAR (mm)	993	
	CWI	123.349	
	Urban	0.000	
	SPR	37.000	
	Results		
	0202777	1917 - 197 oz.	
	Percentage Runoff	(%) 40.45	
Greeni	ield Runoff Volume	(m³) 249.053	
	©1982-2020 Innov		

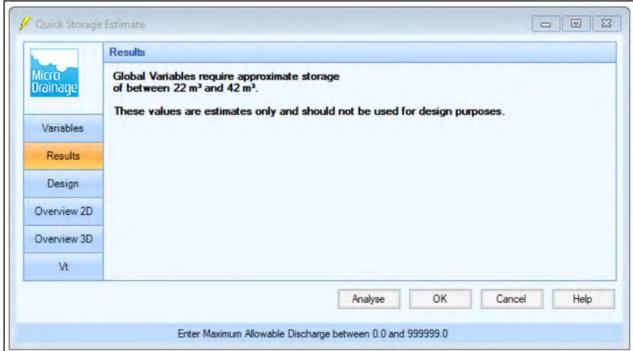


Site address: Land west of Bridgemont, SK23 7PB

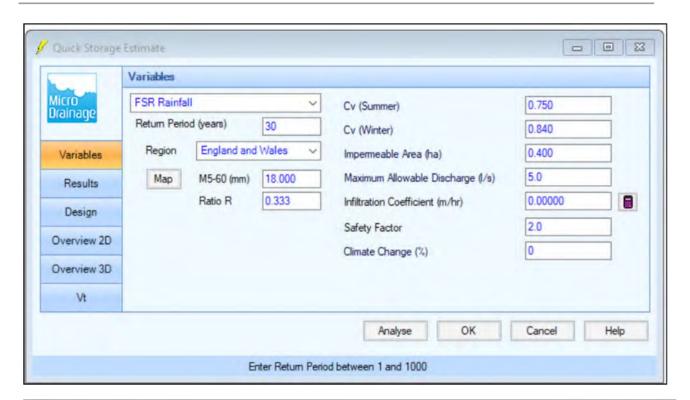
FRA & DRAINAGE STRATEGY

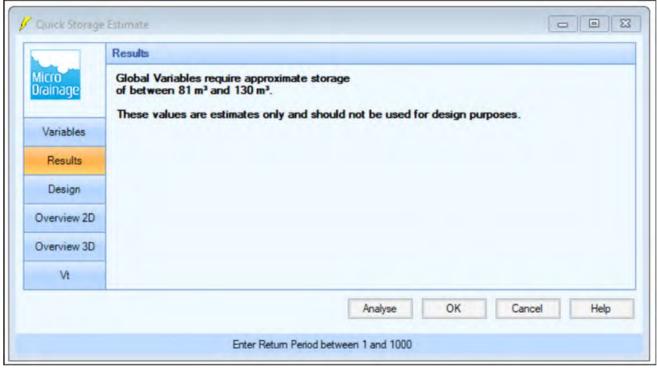
Storage Volume Estimate - Upper Catchment (0.4ha) - discharge to culverted watercourse.



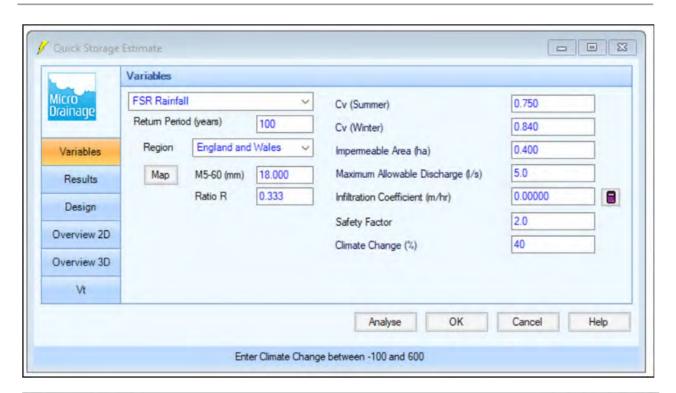


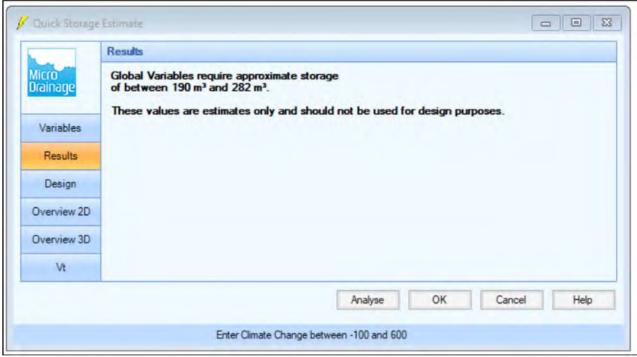








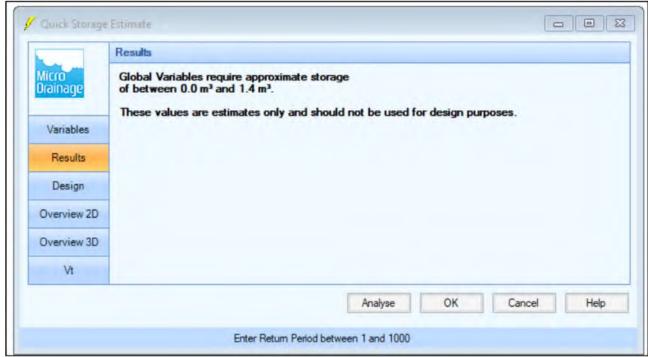




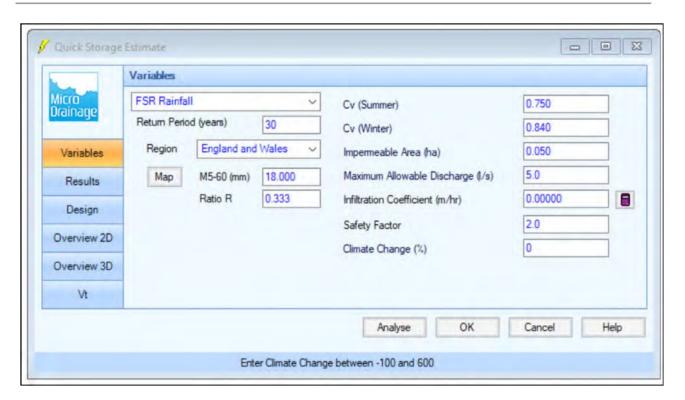


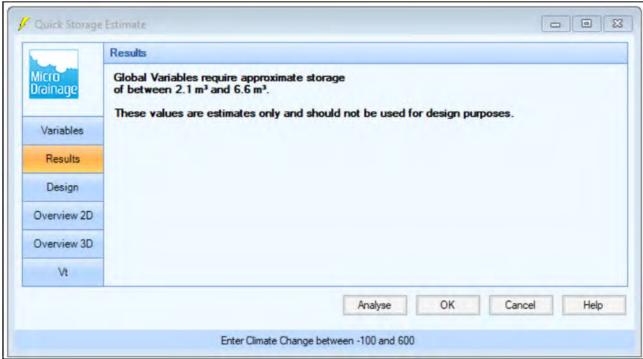
Storage Volume Estimate - Lower Catchment (0.05ha) - discharge to combiend public sewer.



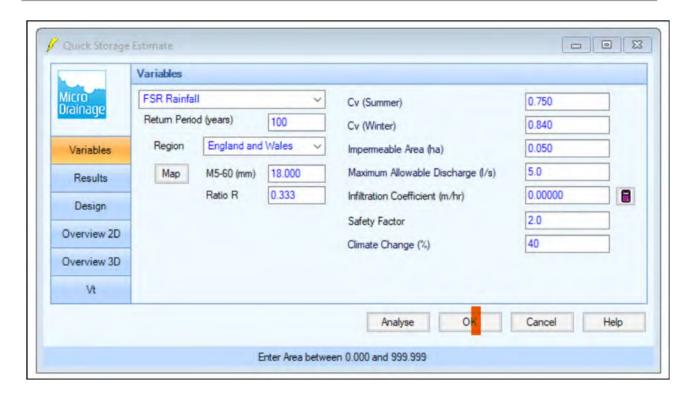


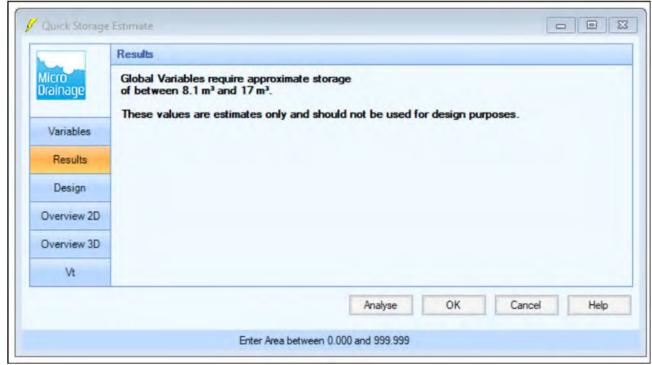














APPENDIX 8 - NETWORK RAIL COMMENTS



Hi Planning Support, Network Rail comme

ents for the Ridrive and website please

Kind regards, Rachael Simpkin

nning Officer (Majors & Comm

Peak Borough C ouncil and Staffordshire Moorlands District Co.

Sent: 28 April 2021 11:47 To: Simplin, Rachael

Subject: High Peak ref HPK-2020-0180 Bridgemont Whaley Bridge 46 dwellings outline 28042021

IMPA/JULIU/180
Treville Properties Ltd And Great Places
Land At Bridgemont Pridgemont
Whaley Bridge
Application for Outline Planning Permission with details of access (all other matters reserved) for erection of 46 affordable dwellings
401230 / 302345

With reference to the protection of the railway, Network Rail has no objection in principle to the proposal, but below are <u>penimenents</u> which must be met as the proposal includes works within 10m of the railway boundary and an interface with the railway; boundary—therefore undertaking the with the agreement and supervision of Network Rail is required. This is to ensure that the works on site, and as a permonent arrangement, do not impact upon the safe operation and integrity of the existing operational railway and for the avoidance of dood of both the council and the developer who may not be aware of the potential for outside party proposals to impact upon the railway.

Rease forward the affacted documents, forms and asset protection contact details to the applicant for actioning the protection of the railway.

Network Rail recognises that conditions are imposed for a planning purpose and that they are fairly and reasonably related to the development and not be manifestly unreasonable. We believe that the comments included in this semail are indeed fair and reasonable and relate to Network Rail's need to ameliorate the impacts that might otherwise flow from the development.

Measurements in railway tracks and railway boundary.

Measurements in railway tracks and railway tracks themselves. From the existing railway tracks to the Network Rail

to ranning traces and ranning commany:

proposals, the developer and connectl are advised, that any measurements must be taken from the operational railway / Network Rail boundary and not from the railway tracks themselves. From the existing railway tracks to the Network Rail and will include critical infrastructure (e.g. cables, signals, overhead lines, communication equipment etc) and boundary treatments (including support nones) that higher be adversely impacted by outside party proposals unless the necessary measurem are understant. No proposal aboult increase Network Rail shability. To ensure the faste operation and integrity of the Manys, Network Rail issues advice on planning applications and requesters of the faste operation and integrity of the rays, Network Rail issues advice on planning applications and requesters of the faste operation and integrity of the rays, Network Rail issues advice on planning applications and requesters forther trailway and not integrity of the rays, Network Rail issues advice on planning applications and requesters of the railway and not integrity of the railway and railway tracks the railway and the railway an

RAMS RAMS The developer is to submit directly to Network Rail, a Risk Assessment and Method Statement (RAMS) for all works to be undertaken within 10m of the operational railway under Construction (Design and Management) Regulations, and this is in addition to any planning consent. Network Rail would need to be re-assured the works on site follow safe methods of working and have also taken into consideration any potential impact on Network Rail land and the existing operational railway infrastructure. Builder to ensure that no dust or debut is allowed to contaminate Network Rail and as the outside party would be liable for any clean-up costs. Review and agreement of the RAMS will be undertaken between Network Rail and the applicant/developer. The applicant/Meveloper should submit the RAMS directly to:

Asserbance-including Network Rail would request that a condition is included in the planning consent as follows:

"A method statement and risk assessment must be submitted to the council and Network Rail for review and agreement prior to works commencing on site."

REASON: To ensure that the construction and subappoint huminament of the grapping can be carried out without adversally affecting the safety, operational needs or integrity of the railway.

A metion sameware that the construction and subsequent maintenance of the proposal can be carried our beaution to sease and supervised and provide at their own expense (if not already in place):

A satisble trespass proof steel politicade fence of a minimum height of 1 lbm adjacent to the boundary with the railway/railway land.

The fence must be wholly constructed and maintained within the applicant's land ownership footprint.

All foundations must be wholly constructed and maintained within the applicant's land ownership footprint without over-sailing or encroaching onto Network Rail's boundary.

The fence must be set back at least Int from the malway boundary to ensure that Network Rail and intensive the sease and intensive production of the sail and the season of the sail and the season of the sail and the season of the sail and the s Any finne maintenance surse to observe a manufacture of the special policy of the operational railway. Network Rail land and its infrastructure or undermine or u

- Any name manmenance must be consumered solely written the applicant's annownersum. Any turner manmenance must be decided to must be decided by the applicant would need to approach the Network Rail Asset Protection Team at least 20 weeks before any works are due to commence on site. The applicant would be liable for all costs incurred in facilitating the proposal and an asset protection agreement may be necessary to undertake works. Network Rail reserves the right to refuse any works by an outside party that may adversely impact its land and infrastructure.

 Any unauthorized access to Network Rail air-space or land will be deemed an act of trespass.

Should the applicant require access to Nework Rail land to facilitate their proposal they would need to approach the Nework Rail Asset Protection Team at least 20 weeks before any works by an outside party that may adversely impact its land and infrastructure.

Any unauthorised access to Nework Rail air-space or land will be deemed an act of trespass.

Scaffolding which is to be constructed within 10 metres of the Network Rail / railway boundary must be estetled in such a manner that at no time will any poles over-ail the railway and protective netting around such scaffolding must be installed. The applicant's contactor must consider if they can undertake the works and associated scaffolding (access for working at height within the foogrant of their hard womership boundary. The applicant is reminded that when pole(s) are exceed for contactor must consider if they can undertake the works and associated scaffolding (access for working at height within the foogrant of their hard womership boundary. The applicant is reminded that when pole(s) are exceed for contactor must consider it is a maintenance work, they must have a minimum and intalized cone between the maximum height of the pole(s) and the railway boundary. The applicant is reminded that when pole(s) are exceed for contactor must consider the access and the scaffolding does not.

Fall onto and damage critical and safety related lineating them down, resulting in serious safety issue; (this is applicable if the proposal is above the railway and where the line is electrified).

Network Rail would request a condition is applied as follows within the planning consent.

Reason.—In the innexes of protecting the railway and its boundary from over-saling scaffolding.

When on the planning of the proposal and infrastructure.

Passon.—In the innexes of protecting the railway and its boundary form over-saling scaffolding.

When on the planning of the proposal and when the planning consent and the work is applied to the pole of the proposal in the proposal is therefor • Any Scaffold Scaffold appli

ever a some. Planning policies and decisions should ensure that: A site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability."

The NPPF states:

178. Planning policies and decisions: should ensure that:

2. A title is similable for its proposed use asking account of ground conditions and any risks arising from land instability.

And

176. Then elearnating planning aplanning aplanning applications, local planning authorities; should ensure flood risk is not increased alsowshere.

In order to comply with the NPPF, the applicant must ensure that the proposal drainage does not increase elearned to comply with the NPPF, the applicant must ensure that the proposal drainage does not increase Network Rail's liability, or cause flooding pollution or soil slippage, vegetation or boundary issues on railway land. Therefore, the proposed drainage on site will include the following.

4. Also drainage proposals for the applicant must be placed at least 30m from the railway boundary.

5. Soiksways, for the proposal must be placed at least 30m from the railway boundary.

4. And rainage proposals for the sets that 30m from the railway boundary.

5. Soiksways for the proposal must be placed at least 30m from the railway boundary.

6. Soiksways for the proposal must be placed at least 30m from the railway boundary.

7. And rainage proposals for the sets that 30m from the railway boundary.

8. Soiksways for the proposal must be placed at least 30m from the railway boundary.

8. Proposal must be placed at least 30m from the railway boundary.

9. Proper provision must be made to accegt and continue drainage discharging from Network Rail and the railway of the provision must be made to accegt and continue drainage discharging from Network Rail and the railway of the provision must be made to accegate and continue drainage discharging from Network Rail at the railway of the provision must be made to access and continue drainage discharging from Network Rail at the railway of the provision must be railways to an access and the railway of the provision must be railways to access that there is no surface or sub-unface flow of sub-unface flow of sub-unface flow of

Excavation and Earthworks and Network Rail land: The NPPF states:
"178. Planning policies and decisions should ensure that.

a. A site is suitable for its proposed use taking present

a. A site it suitable for its proposed use taking account of ground conditions and any ricks arising from land instability."

In order to comply with the NPPF, the applicant will agree all excavation and earthworks within 10m of the railway boundary with Network Rail. Network Rail will need to review and agree the works to determine if they impact upon the support zone of our land and infrastructure as well as determining relative levels in relation to the railway. Network Rail would need to agree the following:

Alterations to ground levels

Works to retaining walls

- Construction and temporary works Maintenance of retaining walls
- Ground investigation works must not be undertaken unless agreed with Network Rail

Ground investigation works must not be undertaken unless agreed with Network Rail.
 Confirmation of retaining wall works (either Network Rail and/or the applicant).
 Alterations in loading within 15m of the railway boundary must be agreed with Network Rail.
 For works next to a cutting or at the toe of an embankment the developer? applicant would be required to undertake a slope stability review.
 Network Rail would need to review and agree the methods of construction works on sits to ensure that there is no impact upon critical railway infrastructure. No excavation works are to commence without agreement from Network Rail. The council are advised that the impact of outside party excavation and earthworks can be different depending on the geography and soil in the area. The council and developer are also advised that support zones for railway infrastructure may extend beyond the railway boundary and into the proposal area. Therefore, consultation with Network Rail is requested. Any right of support must be maintained by the developer.
 Network Rail requests a condition is included in the planning consent as follows:

Condition:

"Pirot to the commencement of the development full details of ground levels, earthworks and excavations to be carried out near to the railway boundary shall be submitted to the Local Planning Authority and Network Rail."

Reason: To protect the adjacent railway and its boundary.

3m Gap

Network Rail requires that the developer includes a minimum 3 metres gap between the buildings and structures on site and the railway boundary. Less than 3m from the railway boundary to the edge of structures could result in construction and future maintenance works being undertaken on Network Rail and, and close to the railway boundary potentially impacting support zones or lineside cabling. All the works undertaken to facilitate the design and layout of the proposal should be undertaken wholly within the applicant's land ownership footprint including all foundation works. Network Rail requires a minimum 3m easement between structures on site and the railway boundary to ensure that we can maintain and renew our boundary treatments.

Notes Network Rail requires that the developer includes a minimum 3 metres gap between the buildings and structures on site and the railway boundary. Less than 3m from the railway boundary to the edge of structures could result in construction and future maintenance works being undertaken on Network Rail and, and close to the railway boundary potentially impacing support zones of lineside cabling. All the works undertaken wholly within the applicant's land ownership footprint including all foundation works. Network Rail requires a minimum 3m essement between structures on site and the railway boundary to ensure that we can maintain and renew our boundary treatments.

The control and the developer (along with their chosen acoustic contractor) are recommended to engage in discussions to determine the most appropriate measures to mitigate noise and vibration from the existing operational railway to ensure that there will be no future issues for residents once they take up occupation of the dwellings.

The NPF states, "162.Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use), in its vicinity, the applicant (or "agent of change") should be required to provide statished intligation before the development and between the development has been completed.

Network Rail is sware that residents of developments adjacent to or in close proximity to, or near to the estising operational railway have in the past discovered issues upon occupation of dwellings with noise and vibration. It is therefore a matter for the development adjacent to construction to ensure that any existing noise and vibration are mitigated appropriately prior to construction.

- developer and me councu via imaganous measures and consuments of countries. On othe are:

 The current level of railway usage may be subject to change at any time without prior notification including increased frequency of trains, night time train running, heavy freight trains, trains run at weekends /bank holidays.

 Maintenance works to trains could be undertaken at night and may mean leaving the trains' motors running which can lead to increased levels of noise and vibration.

 Network Rail carry out works at night on the operational railway when normal rail traffic is suspended and these works can be noisy and cause vibration.

 Network Rail may need to conduct emergency works on the existing operational railway line which may not be notified to residents in advance due to their safety critical nature, and may occur at any time of the day or night, during bank holidays and at weekends

- Network Rail may need to conduct emergency works on the existing operational railway into embarries to rescuests in avalence or the existing operational railway may include the presence of plant and machinery as well as vehicles and personnel for works.

 Works to the existing operational railway may include the presence of plant and machinery as well as vehicles and personnel for works.

 The proposal should not prevent Network Rail from its statutory undertaking. Network Rail is a track authority. It may authorise the use of the track by train operating companies or independent railway operators and may be compelled to give such authorisation. Its ability to respond to any enquiries regarding intended future use is therefore limited.

 The scope and duration of any Noise and Vibration Assessments any only reflect the levels of railway usage at the time of the survey.

 Any assessments required as part of CDM (Construction Design Management) or local planning authority planning authority planning applications validations process are between the developer and their appointed contractor.

 Network Rail cannot advise third parties on specific noise and vibration mitigation measures. Such measures will need to be agreed between the developer, their approved acoustic contractor and the local planning authority.

 Design and layout of proposals should take into consideration and mitigate against existing usage of the operational railway and any future increase in usage of the said existing operational railway.

 Noise and Vibration Assessments should take into account any railway depots, freight depots, light maintenance depots in the area. If a Noise and Vibration Assessment does not take into account any depots in the area then the applicant will be requested to reconsider the findings of the report.

 Railway land which is owned by Network Rail but which may be deemed to be 'disused' or 'mothballed', may be brought back into use. Any proposals for residential development should include mitigation measures agreed between

Trees
Proposals for the site should take into account the recommendations of, 'BS 5837-2012 Trees in Relation to Design, Demolition and Construction', which needs to be applied to prevent long term damage to the health of trees on Network Rail land so that they do not become a risk to members of the public in the future.

No trees shall be planted next to the boundary with the rillway land and the operational railway, except for evergreen shrubs which shall be planted a minimum distance from the Network Rail boundary that is equal to their expected mature growth height.

The vegetation planting must be in line with the attached matrix which has been agreed with the Tree Council. This is to prevent long term issues with leaf fall impacting the operational railway.

As the proposal calls for the following adjacent to the boundary with the operational railway, running parallel to the operational railway or where the existing operational railway is below the height of the proposal site:

• turning circles
• roads, public highways to facilitate access and egress from developments
Network Rail requests the installation of suitable high kerbs or crash barriers (e.g. Armco Safety Barriers)

**Repair of the safe operation of the railways in the safe operation of the safe

Network Rail requests the installation of suitable high kerbs or crash barriers (e.g., Armico Salety Barriers).

This is to prevent which incursion from the proposal area impacting upon the safe operation of the railway.

Network Rail requests that a condition is included within the planning consent as follows:

"Details of appropriate which eaglery protection measures along the boundary with the railway shall be submitted to the Local Planning Authority (in const Reason: to prevent the design and layout of the road and parking spaces from impacting the adjacent operational railway with accidental vehicle incursion.

BAPA (Basic Asset Protection Agreement)

BAPA (Basic Asset Protection Agreement)

As the proposal includes works which could impact the existing operational railway and in order to facilitate the above, a BAPA (Basic Asset Protection Agreement) will need to be agreed between the developer and Network Rail. The developer will be liable for all costs incurred by Network Rail in facilitating this proposal, including any railway site safety costs, possession costs, asset protection costs / presence, site visits, review and agreement of proposal documents and any buried services searches. The BAPA will be in addition to any planning consent.

The applicant / developer should liaise directly with Asset Protection to set up the BAPA (form attached).

Asset Protection Agreement) will need to be agreed between the developer and Network Rail. The developer will be liable for all costs in control of the services of t

AsselProtection NWNorth@networkrail co.uk

No works are to commence until agree with Network Rail. Early engagement with Network Rail is strongly recommended.

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No works are to commence until agree with Network Rail. Early engagement with Network Rail is strongly recommended.

Nould the above proposal be approved by the council and should there be conditions, where the proposal interfaces with the railway (as outlined in this response) the outside party is advised that a BAPA (Basic Asset Protection Agreement) must be in place, in order for Network Rail or view and agree the documentation and works outlined in conditions (and those areas covered by the discharge of conditions).

The applicant is advised that before the proposal progresses (should be approved by well be required to submit the development form to Network Rail's Asset Protection team and agree the BAPA before any works commence on site.

Network Rail is a Government funded Organisation and we are expected to recover our involvement costs from this type of interface, to proceed in more detail with discussions a signed Basic Asset Protection Agreement (BAPA) would be required to he in place.

ee in puts.

Fermanent impacts of development are usually material considerations (such as the position of permanent structures, or drainage design etc) and where these are likely to occur, requests for planning conditions or scheme amendments are requested to protect the existing railway infrastructure from the impacts of the works on site and as a permanent arrangement. Controls on the temporary impact of construction to outside party land should also be picked up via building control, or in some cases a

party wall surveyor.

Once the attached Asset Protection Questionnaire has been completed and forwarded to the team the enquiry will then be processed and an email sent to the applicant giving a project reference number and name of person with the asset protection team that will deal with the enquiry.

For further information on interfacing with Network Rail please see Working by the railway - Network Rail

During the current situation all planning applications and planning policy consultation must be issued to:
TownPlanningLNW@networkrail.co.uk only. Please do not send hard copies to the Manchester office as the Town Planning team are working from h

Diane Clarke

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APPENDIX 9 - Drainage Strategy Addendum - Proposed Site Layout - Option 2

This addendum is provided to confirm that the general principles of the drainage strategy presented in Chapter 17 and 18 will remain largely unchanged in respect of the Proposed Site Layout Option 2 (311106.03 Rev.P02) below.



Proposed Site Layout - Option 2

Foul Water - Site Layout - Option 2

Foul water to discharged at unrestricted rate to Combine Water Sewer within the Buxton Road.

Outfall Manhole (2300UU)

CL =163.66 OAD - TBC, IL = 160.54 AOD - TBC, Depth to invert = 3.12m - TBC

Design and Construction Guidance for foul and surface water sewers offered for adoption under the Code for adoption agreements for water and sewerage companies operating wholly or mainly in England ("the Code") recommends that drainage designs for residential developments should be based on 4000 litres per dwelling per day.

Q Foul Water (litres)= 4000 litres per dwelling per day Proposed Dwellings = 42 Q Foul Water (I per day) = $42 \times 4000 = 168,000$ litres Q Foul Water (I/s) = $168,000 \div (24 \times 60 \times 60) = 1.94$ I/s

The proposed flow rate and outfall is subject to agreement with United Utilities.

Any proposed foul drainage will be designed in accordance with Building Regulations Document H1 and British Standards and where intended for adoption in accordance with "the Code".v.2.1 May 2021.



Surface Water - Site Layout - Option 2

Based on the revised Proposed Site Layout Option 2 (311106.03 Rev.P02) the proposed contributing areas identified within the site total to 6140 m^2 .

Attenuation Storage Volume Estimation - Option 2

Based on the proposed revised site layout Option 2 (311106.03 Rev.P02) the proposed contributing areas identified within the site total to 6140 m^2 .

Due to the site layout and topography, it is proposed to split the drainage strategy into two distinct areas/catchments:

- upper catchment (majority of the site, impermeable areas 0.56ha) controlled discharge to existing culverted watercourse to the north of the site.
- lower catchment (units 1 & 2 and small section of low-lying access road and footway at junction with Bridgemont – impermeable area 0.05ha) - controlled discharge to combined public sewer within Bridgemont Road.

The attenuation volumes in Tables below were calculated using WinDes MicroDrainage software. The storage volumes estimated are indicative only and will be confirmed during detailed design stage.

Estimated Attenuation Storage Volumes Requirements - Option 2 Upper Catchment - discharge to watercourse (impermeable area 0.56ha)

	Proposed Discharge Rate	orge Storage Required Based on contributing areas (0.56	
	Q (litres/sec)	V (m3)	V (m3)
YR 1 (100% AEP)	5	37 < V < 69	53
YR 30 (3.3% AEP)	5	131 < V < 204	167.5
YR 100 CC (1% AEP + 40%CC +10%UC)	5	299< V < 439	369

The estimated storage volumes will be provided within attenuation structures as follows:

- 1 in 30-year return period storage (approximately 167.5 m³) to be provided within large diameter pipes under new access road (constructed to adoptable standards). All subject to detailed design following consultation with Lead Local Flood Risk Authority, United Utilities. Network Rail and further site investigation and surveys.
- 1 in 100-year return period plus 40% climate change allowance storage, approximate 201.5m³ to be
 provided within private attenuation storage system (attenuation tank 95% void ratio) located under
 shared access road in southern section of the site.

Estimated Attenuation Storage Volumes Requirements - Option 1 & 2. Lower Catchment - discharge to combined sewer (impermeable area 0.05ha)

	Proposed Discharge Rate	Storage Required Based on contributing areas (0.05	
	Q (litres/sec)	V (m3)	V (m3)
YR 1 (100% AEP)	5	0 < V < 1.4	0.7
YR 30 (3.3% AEP)	5	2.1< V < 6.6.	4.35
YR 100 CC (1% AEP + 40%CC +10%UC)	5	8.1< V < 17	12.55



The estimated storage volumes will be provided within attenuation structures as follows:

- 1 in 30-year return period storage (approximately 4.35 m³) to be provided within large diameter pipe under new access road (constructed to adoptable standards). All subject to detailed design following consultation with Lead Local Flood Risk Authority, United Utilities. Network Rail and further site investigation and surveys.
- 1 in 100-year return period plus 40% climate change allowance storage, approximate 8m³ to be provided within private attenuation storage system (attenuation tank 95% void ratio).

The preliminary drainage strategy undertaken to establish principles of the design for foul and surface water drainage for the proposed development Option 2 will largely remain as per the main report and will be designed to meet the Statutory Requirements as follows:

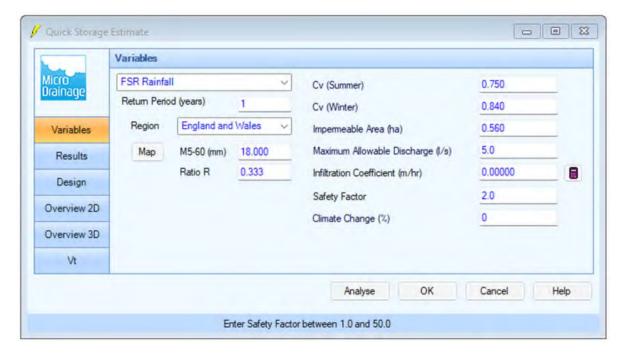
- The 1 in 1-year storage will be provided via Source Control SuDS techniques such as rain gardens, tree cells, permeable surfaces to driveways and pathways with overflow to next drainage element.
- Drainage system will be designed for the critical 100-year (1%) rainfall event with climate change and urban creep allowance, therefore there will be no risk of uncontrolled flooding on site for all rainfall events up 100-year return +40%+10% urban creep.
- All exceedance flows beyond those for which the drainage system is designed will either infiltrate to ground (rain gardens with improved water retention properties) or will be directed thought the site, as such that there will be no risk of flooding of vulnerable or critical areas and there will be no risk of flows from the site causing flooding to other nearby areas.

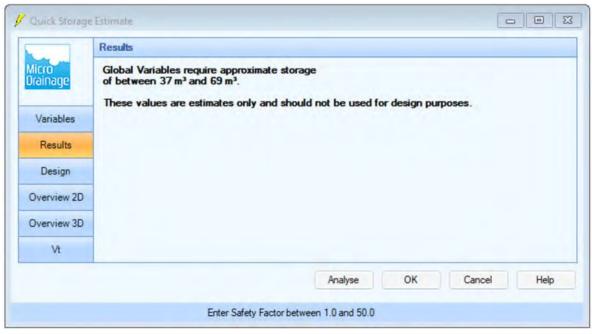
Permeable surfaces will be encouraged throughout the development to provide interception and pollution removal, storage within the sub-base layer with an overflow to next element of drainage system i.e., attenuation structures. Due to proposed site levels baffles might be required within permeable subbase storage layer.

All recommendations will be investigated/developed further during the detailed design stage following consultation with Lead Local Flood Risk Authority, United Utilities. Network Rail and further site investigation and surveys.

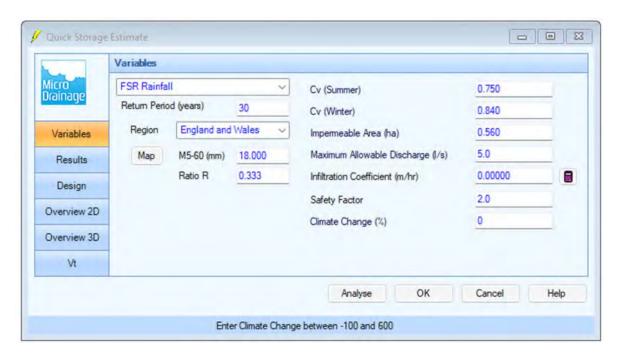


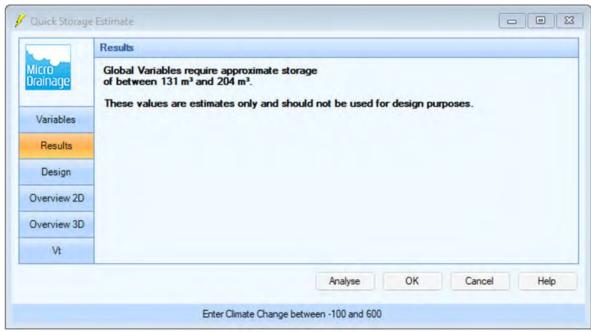
Quick Storage Estimate – Proposed Site Layout Option 2 – Upper catchment



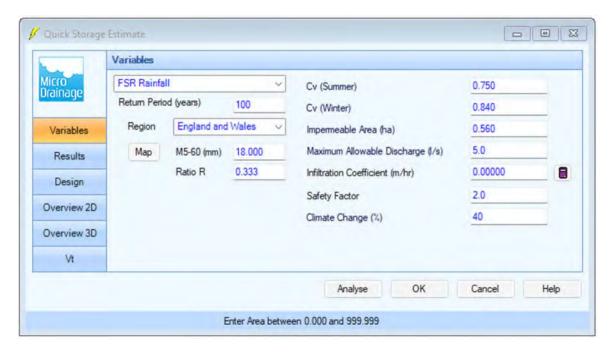


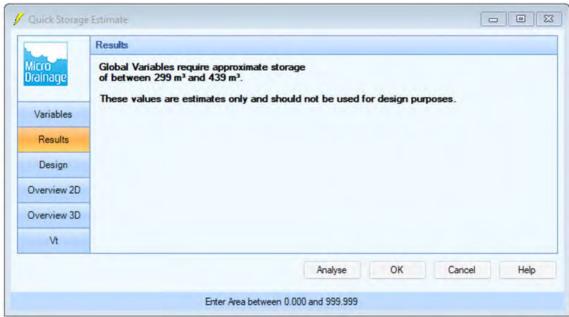












Quick Storage Estimate - Proposed Site Layout Option 2 - Lower catchment - As per Option 1

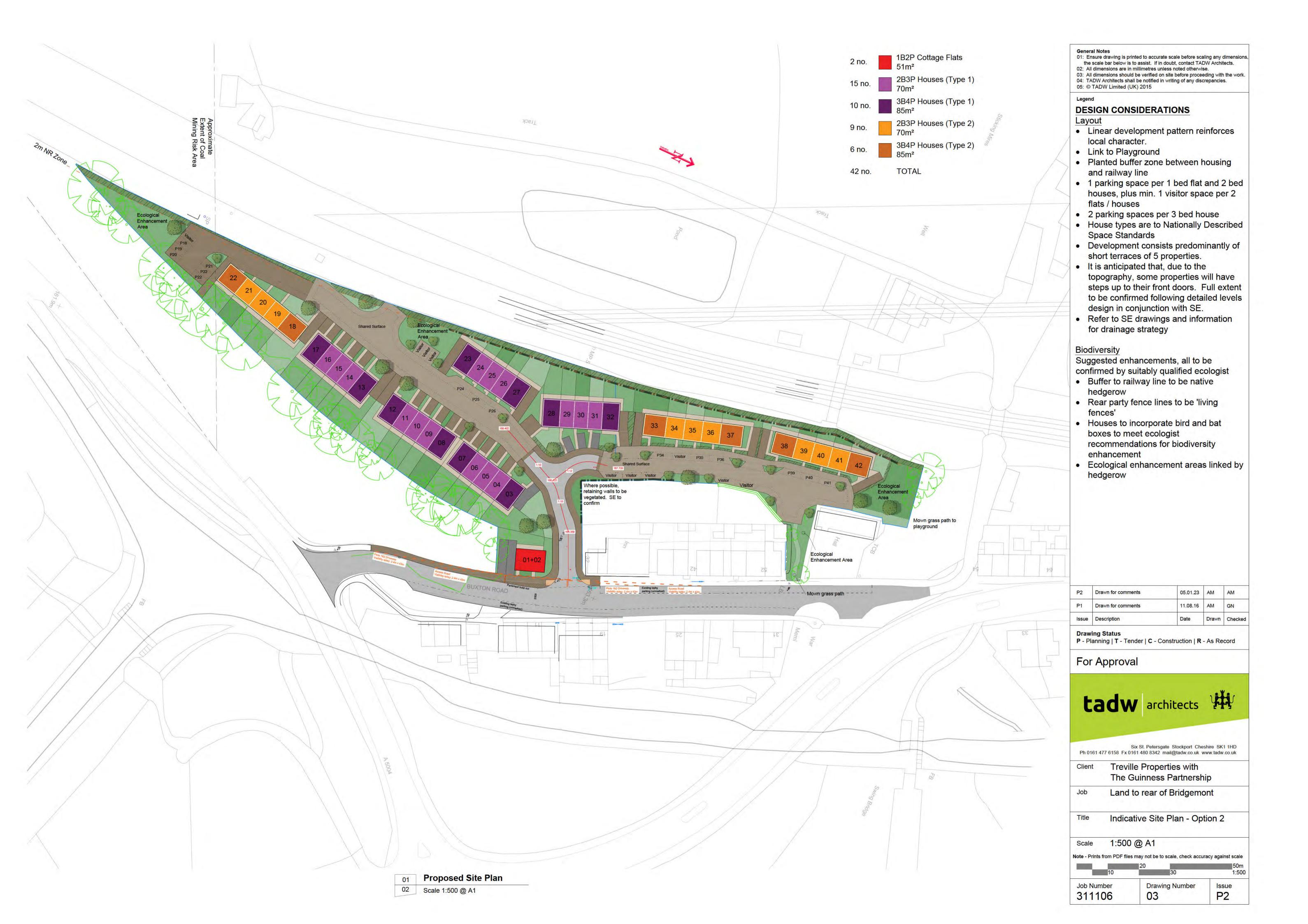


Proposed Site Layout Option 2 - (311106.03 Rev.P02)

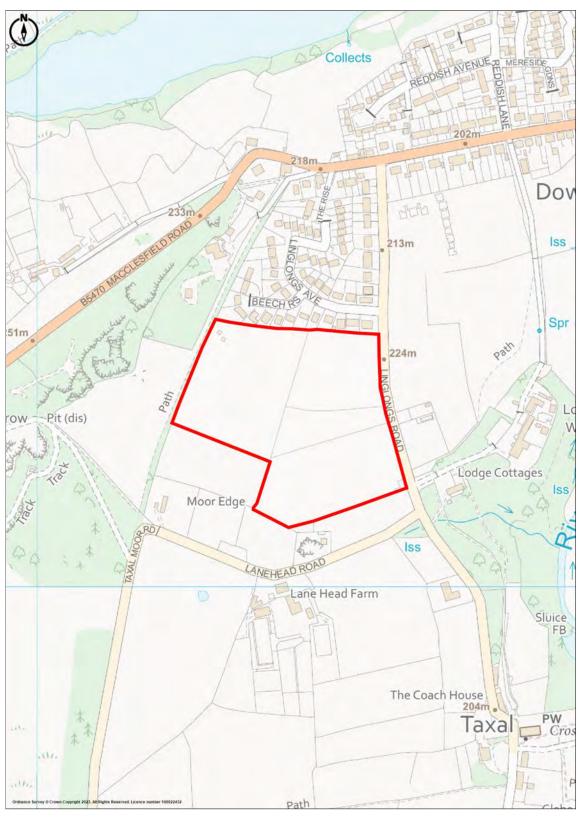








Land at Linglongs Avenue, WhaleyBridge









HIGH PEAK LOCAL PLAN EARLY ENGAGEMENT RESPONSE FORM

Responses invited from 19th January 2023 to 5pm on 3rd March 2023

The Local Plan sets out detailed policies and specific proposals for the development and use of land in High Peak (outside of the Peak District National Park). Your feedback will help the Council to identify the issues and options for the Local Plan for consultation later in 2023.

Your Contact Details:

	Personal details	Agent's details (if applicable)
Title		
Name		
Job title (if applicable)	Treville Properties Ltd	
Organisation (if applicable)		Emery Planning Partnership
Address		
Post code		
Telephone no.		
Email address		

PLEASE NOTE that responses must be attributable to named individuals or organisations. They will be held by the Council and will be available to view publicly and cannot be treated as confidential. Your contact details will not be published, but your name and organisation (if relevant) will. High Peak Borough Council maintains a database of consultees who wish to be kept informed about the Local Plan. Details of our data protection and Privacy Notice can be found on the council's website at: https://www.highpeak.gov.uk/YourData

Please complete and return this form by 5pm on 3rd March 2023

by email to: Idf@highpeak.gov.uk; or

by post to: Planning Policy, High Peak Borough Council, Town Hall, Buxton,

Derbyshire, SK17 6EL

Alternatively, you can respond online on the Local Plan consultation website https://highpeak-consult.objective.co.uk/kse.

Question 1 Do you agree with the Council's initial view of the emerging issues identified from the new evidence? (please select one answer)
Yes No N
If not, why?
See attached statement
Question 2 Should the next Local Plan have a new Spatial Vision? (please select one answer)
Yes Y No
If so, what should it say?
To determined once all background evidence to hand.

Question 3 What should be the Strategic Objectives for the next Local Plan?

Not applicable to these representations
Question 4
Are there any other policies in the Local Plan that you think should be updated?
(please select one answer)
Yes A
No

Please specify which policy and how it should be updated.

need	ies relating to housing and employment land supply and distribution (e.g. S3 and S4) will to be updated to reflect current evidence and local circumstances, including pletions/commitments.
Are the	tion 5 here any other new policies that you think the next Local Plan should de? se select one answer)
Yes	
No	
Pleas	e specify what the new policy should seek to address and why.
Not a	applicable to these representations

Question 6

What other evidence should the Council consider to inform the next Local Plan?

Section 3 of the early engagement document, pages 21 to 30 list valor will be undertaken in order to inform the next Local Plan. The prior to the next stage of engagement and made publicly available	se reports should be finalised		
Question 7 & 8 Do you have any site suggestions for housing and / o	r employment?		
If you would like to suggest several sites, please submit a separate form for each one.			
What is your interest in the site? (please select all that apply)			
Owner of the site	Υ		
Parish / Town Council			
Local resident			
Amenity / Community Group			
Planning Consultant			

Land Agent	
Developer	
Other	
Other (please specify)	
Are you the sole or part owner of the site?	
(please select one answer)	
Sole Owner	Υ
Part Owner	
Neither	
If you are not the landowner or the site is in m the name, address and contact details of the la provided	
If not the landowner, I confirm that the landow site submission (please select one answer)	ner/s have been informed of this
Yes	

No			
Does the owner(s) support the development of the site? (please select one answer)			
Yes			
No [
Site location (including grid reference and postcode if known)			
Land to the west of Bridgemont, Whaley Bridge, High Peak, Derbyshire, SK23 7PB (grid reference - SK012823)			
Site Area (hectares)			
1			
Current Land Use(s) e.g. agriculture, employment, unused/vacant etc.			
Agriculture/former compound/vacant			
Type of site e.g. greenfield, previously developed land/brownfield			
Greenfield			

Please provide a site ¡	plan clearly	identifying the	exact boundaries	of the site
-------------------------	--------------	-----------------	------------------	-------------

See attached	
Proposed Future Uses & Potential Site Capac (please select all that apply)	city (please specify)
Housing	Υ
Employment	
Mixed-use (please specify uses)	
Self-build & custom-build housing	
Basic Capacity Information – area/number of units/proposed floorspace	dwellings/number of
Circa 42 dwellings	
Market interest - please choose the most app indicate what level of market interest there is (please select all that apply)	
Site is owned by a developer	Y
Site is under option to a developer	
Enquiries received/ strong interest	
Site is currently being marketed	

None			
Not Known			
Comments on market interest			
The site owner is a house builder and intends to develop the site.			
Utilities - Please tell us which of the following utilities are available to the site (please select all that apply)			
Mains water supply	Υ		
Mains sewerage	Y		
Electric supply	Υ		
Gas supply	Υ		
Public highway	Y		
Landline telephone/broadband internet	Y		
Public Transport	Υ		
Other (please specify)			

Utilities – comments	
Constraints - Please tell us which of the following constraints are the site (please select all that apply)	re applicable to
Land in other ownership must be acquired to enable the site to be de	eveloped
Restrictive covenants exist	
Current land use(s) need to be relocated	
Physical constraints (topography, trees, other)	
Flood Risk	
Infrastructure required	
Public rights of way cross or adjoin the site	
Land contamination	
Access constraints	
Environmental constraints	

Please provide any relevant information of likely measures to overcome the above constraints

	assessments are submitted as appendices to the attached Local Plan Reto demonstrate that there are no overriding constraints to development	
t	Fimescales - Please indicate the approximate timescale for decome available for development (please select one answer)	r when the site will
	mmediately	
ι	Jp to 5 years	Υ
5	5 - 10 years	
1	10 – 15 years	
Ε	Beyond 15 years	
ι	Jnknown	

Timescales comments – particularly if you have indicated that the site is not immediately available, please explain why

Our client is the site owner and their intention is to develop the land as soon as planning permission is granted.
Other Balance (Information Blacks and the access halos for additional
Other Relevant Information – Please use the space below for additional information
See attached statement
Question 9
Do you have any site suggestions for Local Green Spaces?
If you would like to suggest several sites, please submit a separate form for each one.
Site location (including grid reference and postcode if known)
Not applicable to these representations

Please provide a site plan clearly identifying the exact boundaries of the	site.
Location - Is the site in reasonably close proximity to the community it se	erves?

Local Significance - Is the site demonstrably special to a local community and holds a particular local significance, e.g. due to its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife?

Size / Scale - Is	the site local in	character and	l not an extens	ive tract of land?
If possible, plea comments.	ase provide pho	tographs of th	e site that sup	port your

Question 10

Do you have any site suggestions for ecological improvements?

If you would like to suggest several sites, please submit a separate form for each one

Site location (i	including	grid reference an	d postcode	if known
------------------	-----------	-------------------	------------	----------

Not applicable to these representations	
Please provide a site plan clearly i	dentifying the exact boundaries of the site
(please select one answer)	
Do you own the site? (please select one answer) Yes (full ownership) Yes (part ownership)	
(please select one answer) Yes (full ownership) Yes (part ownership)	
(please select one answer) Yes (full ownership) Yes (part ownership) No	ntrol adiacent land.
(please select one answer) Yes (full ownership) Yes (part ownership)	ntrol adjacent land.
(please select one answer) Yes (full ownership) Yes (part ownership) No	ntrol adjacent land.

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until when.
ing issues,

Question 11

Do you have any site suggestions for renewable energy?

If you would like to suggest several sites, please submit a separate form for each one.

Site location (including grid reference and postcode if known)

Not applicable to these representations	
Please provide a site plan clearly identifying the exact boundaries of the site) .
Please specify the proposed type and scale of energy development (Capacity (MW), Height to tip (m), Height to hub (m))	y
Do you own the site? (please select one answer)	
Yes (full ownership)	
Yes (part ownership)	

How can the site be accessed? Are there any restrictions that may prevent access e.g. third party ownership?
Please specify known designations (ecological / environmental / historical) o or around the proposed site
Current land use (including agricultural land quality rating if relevant)
Proposed grid connection point (if known)

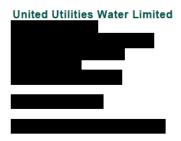
Question 12

Do you have any site suggestions for other uses that you think should be included in the Local Plan?

included in the Local Plan?	
What use is the site proposed for?	
Not applicable to these representations	
Site location (including grid reference and	nostcodo if known)
Site location (including grid reference and	postcode ii kilowii)
Please provide a site plan clearly identifying	ng the exact boundaries of the site.
Do you own the site?	
(please select one answer)	
Yes (full ownership)	
Yes (part ownership)	
No	

How can the site be accessed? Are there any restrictions that may prevent access e.g. third party ownership?
Please specify known designations (ecological / environmental / historical) on or around the proposed site
Current land use
Signature
Date 3 March 2023
Thank you for completing this response form.





By email only: ldf@highpeak.gov.uk

Planning Policy High Peak Borough Council Town Hall Market Place Buxton Derbyshire SK17 6EL Your ref: Our ref:

Date: 03-MARCH-23

Dear Sir / Madam

HIGH PEAK BOROUGH COUNCIL LOCAL PLAN REVIEW CONSULTATION

Thank you for your consultation seeking the views of United Utilities Water Limited (UUW) as part of the Local Plan process. UUW wishes to build a strong partnership with all local planning authorities (LPAs) to aid sustainable development and growth within its area of operation. We aim to proactively identify future development needs and share our information. This helps:

- ensure a strong connection between development and infrastructure planning;
- deliver sound planning strategies; and
- inform our future infrastructure investment submissions for determination by our regulator.

UUW wishes to highlight the benefit of early, constructive communication with the council and site promoters to ensure a co-ordinated approach to the delivery of any future allocations. We will seek to work closely with the council during the local plan process to develop a coordinated approach for delivering sustainable growth in sustainable locations.

When preparing the Development Plan and future policies, new development should be focused in sustainable locations which are accessible to local services and infrastructure. We can most appropriately manage the impact of development on our infrastructure if development is identified in locations where infrastructure is available with existing capacity.

Our Assets

It is important to outline the need for our assets to be fully considered in any proposals you bring forward.

UUW will not allow building over or in close proximity to a water main.

UUW will not allow a new building to be erected over or in close proximity to a public sewer or any other wastewater pipeline. This will only be reviewed in exceptional circumstances.

Site promoters should not assume that our assets can be diverted.

On occasion, an asset protection within a site can preclude delivery.

As you would expect, there will be a range water and wastewater assets within, and in the vicinity of, many of your future draft allocations. It is critical that site promoters engage with UUW on the detail of their design and the proposed construction works.

All UUW assets will need to be afforded due regard in the masterplanning process for a site. This should include careful consideration of landscaping and biodiversity proposals in the vicinity of our assets and any changes in levels and proposed crossing points (access points and services).

We strongly recommend that the LPAs advise future applicants of the importance of fully understanding site constraints as soon as possible, ideally before any land transaction is negotiated, so that the implications of our assets on development can be fully understood and agreed. We ask site promoters to contact UUW to understand any implications by contacting:

Developer Services – Wastewater

Tel: 03456 723 723

Email: WastewaterDeveloperServices@uuplc.co.uk

Developer Services – Water

Tel: 0345 072 6067

Email: <u>DeveloperServicesWater@uuplc.co.uk</u>

Our Response

As an early engagement consultation without proposed policies or site allocations, it is difficult for UUW to provide detailed comments. This response therefore identifies key issues for consideration and includes proposed policy wording that UUW would wish to see included in future versions of the local plan.

Co-ordinated Infrastructure Provision

We wish to note that any growth needs to be carefully planned to ensure new infrastructure provision does not cause any unexpected delays to development delivery. The full detail of the development proposals are not yet known. For example, the detail of the drainage proposals, the points of connection or the water supply requirements. As a result, it is important that we highlight that in the absence of such detail, we cannot fully conclude the impact on our infrastructure over a number of 5-year investment periods and therefore as more detail becomes available, it may be necessary to co-ordinate the timing for the delivery of development with the timing for delivery of infrastructure.

Once more information is available with respect to specific development sites, which is often only at the planning application stage, we will be able to better understand the potential impacts of development on infrastructure and, as a result, it may be necessary to coordinate the delivery of development with the timing for the delivery of infrastructure improvements. We recommend that you include a development management policy in your draft plan to this effect. Our recommended policy is below.

'Once more details are known on development sites, it may be necessary to coordinate the delivery of development with timing for the delivery of infrastructure improvements.'

We wish to highlight that the rural parts of High Peak are often supported by infrastructure which is proportionate to its rural location. UUW wishes to emphasise that disproportionate growth in any

settlement, especially small settlements, has the potential to place a strain on existing water and wastewater infrastructure. Therefore, when considering growth proposals, it is good practice to ensure that growth is proportionate to the size of the settlement. Noting the nature of this consultation, we do not have the information that we require on potential allocations in order to be able to begin to initially assess the potential cumulative impact on our water and wastewater infrastructure in any settlement.

Sites in Multiple Ownerships

UUW has concerns regarding any site allocations which are in multiple land ownerships. The experience of UUW is that where sites are in multiple ownership, the achievement of sustainable development can be compromised by developers/applicants working independently. We therefore encourage you to make early contact with all landowners/site promoters and challenge those landowners on how they intend to work together, preferably as part of a legally binding delivery framework and / or masterplan. We believe that raising this point at this early stage is in the best interest of achieving challenging delivery targets from allocated sites in the most sustainable and co-ordinated manner.

We recommend that future policy requires applicants to provide drainage strategies for foul and surface water. For larger sites, we would recommend that policy requires applicants to prepare an infrastructure phasing and delivery strategy. For strategic sites, we recommend that early consideration is given to the infrastructure strategy as part of the preparation of the local plan and to ensure a co-ordinated approach to the delivery of new development and infrastructure. We would recommend the following policy is considered for inclusion in any future local plan:

'Where applications are submitted on land which is part of a wider allocation, applicants will be expected to submit allocation-wide infrastructure strategies to demonstrate how the site will be brought forward in a co-ordinated manner. The strategies shall be prepared in liaison with infrastructure providers and demonstrate how each phase interacts with other phases and ensure coordination between phases of the development over lengthy time periods and by numerous developers. Where necessary, the strategy must be updated to reflect any changing circumstances between phase(s) during the delivery of the development.'

Climate Change Policy

UUW wishes to highlight its support for climate change being embedded in the Vision and Strategic objectives. In doing so, we request that you expand your Vision and Strategic Objectives to include clear references to sustainable surface water management and the efficient use of water. We encourage future policy on climate change to be intrinsically linked to wider policies in the local plan including those relating to the detailed design of new developments and the provision of green and blue infrastructure, as well as the High Peak Climate Change Action Plan and Vision Derbyshire Climate Change Guidance (2022) as identified in the Early Engagement Document.

We would be keen to ensure any climate change policy gives appropriate emphasis to green and blue infrastructure, natural flood management techniques, multi-functional sustainable drainage, designing new development so that it is resilient to the challenges of future climate change and the incorporation of water supply efficiency measures.

As the LPA will be aware, green infrastructure can help to mitigate the impacts of high temperatures, combat emissions, maintain or enhance biodiversity and reduce flood risk. Green / blue infrastructure and landscape provision play an important role in managing water close to its source. If the necessary link between green/blue infrastructure, surface water management and landscape design is outlined as

a strategic requirement, it will help ensure that sustainable surface water management is at the forefront of the design process.

Water Efficiency and Climate Change

In accordance with our above comments relating to the vision and strategic objectives for the emerging local plan, we recommend that the local plan includes a policy requirement for new development to be built to the optional water efficiency standard prescribed in Building Regulations. A tighter water efficiency standard in new development has multiple benefits including a reduction in water and energy use, as well as helping to reduce customer bills. Water efficiency is therefore a key component of your journey to net zero.

At the current time, Building Regulations includes a requirement for all new dwellings to achieve a water efficiency standard of 125 litres of water per person per day (I/p/d). In 2015 an 'optional' requirement was introduced which is currently set at 110 l/p/day for new residential development. This can be implemented through local planning policy where there is a clear need based on evidence. We have enclosed evidence to justify this approach. As you will see from the evidence, we believe that the optional standard can be achieved at minimal cost. We therefore recommend the local plan includes the following water efficiency policy:

'Water Efficiency

All new residential developments must achieve, as a minimum, the optional requirement set through Building Regulations Requirement G2: Water Efficiency or any future updates. All major non-residential development shall incorporate water efficiency measures so that predicted per capita consumption does not exceed the levels set out in the applicable BREEAM 'Excellent' standard. Where the 'Excellent' Standard cannot be achieved, evidence must be submitted with an application to the satisfaction of the local planning authority. The BREEAM 'Very Good' standard must be met as a minimum.'

As mentioned below, surface water should be managed as close to its source as possible. There are opportunities such as rainwater recycling, green roofs and water butts and we would encourage the LPA to embrace all water efficiency measures. Modern design techniques can promote measures for water recycling to reduce the impact on infrastructure requirements.

Landscaping

We wish to emphasise that the evaluation of surface water management opportunities should be undertaken early in the design process. It is imperative that the approach to design including site analysis is intrinsically linked to making space for water. Sustainable surface water management will be particularly important to consider in the context of the requirement for new streets to be tree lined. It is a national policy requirement that new streets are tree lined as stated in paragraph 131 within the NPPF. Therefore, UUW wishes to recommend the following wording for inclusion within the Local Plan:

'Landscaping proposals, including proposals for tree-lined streets, must be integrated with the strategy for sustainable surface water management. Landscaping proposals must evaluate and identify opportunities for sustainable surface water management.'

We also support encouragement for water re-use opportunities in redevelopment proposals such as grey water recycling.

Any approach to planting new trees must also give due consideration to the impact on utility services noting the implications that can arise as a result of planting too close to utility services. This can result in root ingress, which in turn increases the risk of drainage system failure and increases flood risk. It will be important that applicants refer to our 'Standard Conditions for Works Adjacent to Pipelines' (a copy of which can be found on our website) and consult with us when implementing the delivery of landscaping proposals. The approach to any planting must have regard to the proximity to existing or proposed utility assets to ensure there is no impact on these assets such as root ingress. Trees should not be planted directly over water and wastewater assets or where excavation onto the asset would require removal of the tree.

Sustainable Drainage - Foul Water and Surface Water

New development should manage foul and surface water in a sustainable way in accordance with national planning policy. We wish to emphasise the importance of any future policy setting out the need to follow the hierarchy of drainage options for surface water in national planning practice guidance which clearly identifies the public combined sewer as the least preferable option for the discharge of surface water.

UUW recommends that the issues of flood risk and surface water management are dealt with as **two separate policies**. It is our view that a separate planning policy for each matter sets a clear process in relation to surface water management for **all** new development.

Paragraph 167 of the National Planning Policy Framework (NPPF) outlines that 'When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment'.

Noting that not all applications are required to submit a flood risk assessment, UUW wishes to outline that emerging policy should set an expectation that all applications will be required to submit clear evidence that the hierarchy for surface water management has been fully investigated to ensure that flood risk is not increased elsewhere. We wish to recommend that policy requires applicants to submit a foul and surface water drainage strategy that fully investigates the surface water hierarchy to minimise the risk of flooding and ensures that future development sites are drained in the most sustainable way whilst being resilient to the challenges of climate change. We wish to recommend the following wording for inclusion as policy in any future local plan.

'Sustainable Drainage – Foul and Surface Water

All applications must be supported by a strategy for foul and surface water management. Surface water should be discharged in the following order of priority:

- i. An adequate soakaway or some other form of infiltration system.
- ii. An attenuated discharge to a surface water body.
- iii. An attenuated discharge to public surface water sewer, highway drain or another drainage system.
- iv. An attenuated discharge to public combined sewer.

Proposals should be designed to maximise the retention of surface water on-site and minimise the volume, and rate of, surface water discharge off-site. On greenfield sites, any rate of discharge shall be restricted to a greenfield run-off rate. On previously developed land, applicants must also follow the hierarchy for surface water management and target a reduction to a greenfield rate of run-off. Proposals on previously developed land must achieve a minimum reduction in the rate of surface water

discharge of 30% rising to a minimum of 50% in any critical drainage area identified by the SFRA. To demonstrate any reduction, applicants must submit clear evidence of existing operational connections from the site with associated calculations on rates of discharge. Where clear evidence of existing connections is not provided, applicants will be required to discharge at a greenfield rate of run-off.

The design of proposals must assess and respond to the existing hydrological characteristics of a site to ensure a flood resilient design is achieved and water / flooding is not deflected or constricted.

Applications for major development will be required to incorporate sustainable drainage which is multifunctional, in accordance with the four pillars of sustainable drainage, in preference to underground piped and tanked storage systems, unless, there is clear evidence why such techniques are not possible. The sustainable drainage should be integrated with the landscaped environment and the strategy for biodiversity net gain.

For any development proposal which is part of a wider development / allocation, foul and surface water strategies must be part of a holistic site-wide strategy. Pumped drainage systems must be minimised and a proliferation of pumping stations on a phased development will not be acceptable.

Applications must be accompanied by drainage management and maintenance plans including a plan for any watercourse within the application site or an adjacent watercourse where the application site is afforded riparian rights.

Explanatory Text

Application of the hierarchy for managing surface water will be a key requirement for all development sites to reduce flood risk and the impact on the environment. Clear evidence must be submitted to demonstrate why alternative preferable options in the surface water hierarchy are not available.

Foul and surface water drainage must be considered early in the design process. Sustainable drainage should be integrated with the landscaped environment and designed in accordance with the four pillars of sustainable drainage (water quantity, water quality, amenity and biodiversity). It should identify SuDS opportunities, including retrofit SuDS opportunities, such as green roofs; permeable surfacing; soakaways; filter drainage; swales; bioretention tree pits; rain gardens; basins; ponds; reedbeds and wetlands. Any drainage should be designed in accordance with 'Ciria C753 The SuDS Manual', sewerage sector guidance, or any subsequent replacement guidance.

The hydrological assessment of the site must consider site topography, naturally occurring flow paths, ephemeral watercourses and any low lying areas where water naturally accumulates. Resultant layouts must take account of such circumstances. Applications will be required to consider exceedance / overland flow paths from existing and proposed drainage features and confirm ground levels, finished floor levels and drainage details. Drainage details, ground levels and finished floor levels are critical to ensure the proposal is resilient to flood risk and climate change. It is good practice to ensure the external levels fall away from the ground floor level of the proposed buildings (following any regrade), to allow for safe overland flow routes within the development and minimise any associated flood risk from overland flows. In addition, where the ground level of the site is below the ground level at the point where the drainage connects to the public sewer, care must be taken to ensure that the proposed development is not at an increased risk of sewer surcharge. It is good practice for the finished floor levels and manhole cover levels (including those that serve private drainage runs) to be higher than the manhole cover level at the point of connection to the receiving sewer.

Holistic site-wide drainage strategies will be required to ensure a coordinated approach to drainage between phases, between developers, and over a number of years of construction. Applicants must demonstrate how the approach to drainage on any phase of development has regard to interconnecting phases within a larger site with infrastructure sized to accommodate interconnecting phases. When necessary, the holistic drainage strategy must be updated to reflect any changing circumstances between each phase(s). The strategy shall demonstrate communication with infrastructure providers and outline how each phase interacts with other phases.

Flood Risk

When considering flood risk policy and the location of development, we believe it is important to highlight that the preparation of the local plan should give sufficient emphasis to all forms of flood risk. UUW therefore recommends the following policy wording to be included in the Local Plan:

'The risk of flooding from any source must be considered. Applicants will be required to consult with the water and sewerage undertaker to confirm the nature and extent of any flood risk from sewers and reservoirs.

For sewers, the consultation should confirm:

- a) if there are any sewer surcharge levels at the point of connection that could influence site design;
- b) whether there is an incident of sewer flooding at, or in the vicinity of, the proposed development site; and
- c) if sewer modelling data indicates that existing sewers that pass through or near to the site present a modelled risk of sewer flooding.

This information will inform whether to apply the sequential approach. Development should not be located in an area at risk of flooding. Applicants must demonstrate that proposals do not increase flood risk and are safe. Applicants should not assume that changes in levels or that changes to the public sewer (including diversion), will be acceptable as such proposals could increase / displace flood risk.'

On-site Flood Risk

When considering potential new development sites, it is important to identify where there are existing public sewers within or near to the site, which are predicted to be at risk from flooding and/or sites where there is a record of previous flooding from the public sewer. Proposals could also be affected by overland flows from nearby off-site public sewers. Policy should be clear that existing flood risk must not be displaced and that any flood risk needs to be considered early in the design process. This can be better understood once more details become available on specific sites, for example, topographic information, which will inform where exceedance paths flow.

We would welcome site of your potential allocations so that we can advise on any potential sewer flood risk. The strong preference of UUW is for development to take place outside of any identified flood risk in accordance with the sequential approach.

In instances where sites are affected by sewer flood risk and it is your decision to continue to allocate the site, we suggest the following additional policy wording for each site which we have identified. Where there is a modelled flood risk, we would recommend the following wording:

'Modelled Sewer Flood Risk

Existing public sewers pass through and near to this site which modelling data (and / or flooding incident data) identifies as being at risk of sewer flooding. This will need careful assessment and consideration in the detailed design, masterplanning and drainage details for the site. The risk of sewer flooding could affect the developable area of the site and the detail of the design.'

Where there is a record of flooding on-site, or in the vicinity of the site, we would recommend the following wording:

'Sewer Flooding Incidents

'There are flood incidents from the public sewer on-site / in the wider area. Applicants must engage with United Utilities to consider the detailed design of the site and drainage details. The risk of sewer flooding could affect the developable area of the site and the detail of the design.'

We also recommend the following explanatory text in respect of sewer flood risk matters:

'Explanatory Text

A range of sites have been identified as at risk of sewer flooding or in the wider vicinity of sewer flooding. In respect of these sites, the applicant must engage with United Utilities prior to any masterplanning to assess the flood risk and ensure development is not located in an area at risk of flooding from the public sewer. Applicants should consider site topography and any exceedance flow paths. Resultant layouts and levels should take account of such existing circumstances. Applicants must demonstrate that the proposed development would be safe and not lead to increased flood risk. Applicants should not assume that changes in levels or changes to the public sewer, including diversion, will be acceptable as such proposals could increase / displace flood risk. It may be necessary to apply the sequential approach and incorporate mitigating measures subject to the detail of the development proposal. Careful consideration will need to be given to the approach to drainage including the management of surface water; the point of connection; whether the proposal will be gravity or pumped; the proposed finished floor and ground levels; the management of exceedance paths from existing and proposed drainage systems and any appropriate mitigating measures to manage any risk of sewer surcharge.'

Groundwater Source Protection Zones

The Environment Agency has defined Groundwater Source Protection Zones (SPZs) for groundwater sources, which are often used for public drinking water supply purposes. The prevention of pollution to drinking water supplies is critical. The SPZs signify where there may be a particular risk from activities on or below the land surface. Such activities include construction. The details of SPZs can be viewed on the website of the Environment Agency. We would also be happy to provide details if that would be helpful.

With respect to the site selection process, we wish to highlight that new development sites are more appropriately located away from locations which are identified as sensitive groundwater protection areas. The strong preference of UUW is for development to take place outside of any Environment Agency designated SPZ1, as this is the most sensitive location from a groundwater protection viewpoint.

It is critical that there is clear policy wording outlining the requirements for development that mitigate the effects of development on the groundwater environment and public water supply. In addition to any

site-specific wording, you should also include standalone policy in the local plan relating to groundwater source protection zones. Our recommended policy and associated explanatory text is set out below.

'Groundwater Source Protection Zones

Development proposals must accord with the latest national guidance on Groundwater Protection. Where necessary, applicants will be required to undertake a risk assessment (quantitative and qualitative) of the impact on the groundwater environment and public water supply. Development will only be acceptable where it is demonstrated to the Local Planning Authority that there will be no unacceptable impact on the groundwater environment and public water supply.

Explanatory Text

Where required in consultation with the Environment Agency and/or the water and sewage company, new development proposals will be expected to be supported by a risk assessment, careful masterplanning, and the incorporation of mitigation including measures to manage the impact of the construction process. Guidance on development in groundwater source protection zones is provided on gov.uk and within the 'Environment Agency's Approach to Groundwater Protection'.

A quantitative and qualitative risk assessment and mitigation strategy with respect to groundwater protection will be required to manage the risk of pollution to public water supply and the water environment. The risk assessment should be based on the source-pathway-receptor methodology. It shall identify all possible contaminant sources and pathways for the life of the development and provide details of measures required to mitigate any risks to groundwater and public water supply during all phases of the development. Subject to the outcome of the risk assessment, the mitigation measures may include the highest specification design for the new foul and surface water sewerage systems (pipework, trenches, manholes, pumping stations and attenuation features).

As noted above, it is important that any allocation which is within a groundwater source protection zone is first assessed to determine if the principle is acceptable and thereafter any proposal should be covered by site-specific detail which clearly identifies this constraint and the need for proposals to be undertaken in accordance with the above recommended policy.

Water Catchment Land

UUW wishes to note that large parts of High Peak are public water supply catchment land. Development proposals on water catchment land can have an impact on water supply resources and therefore we recommend that you include a policy which identifies the need to engage with the statutory undertaker for water to determine whether any proposal is on land used for public water supply catchment purposes. Please get in touch for information on the location of catchment land in the borough.

In cases of wind energy proposals on water catchment land the applicant should seek to locate development so that the impact on public water supply is minimised through the location of the development and through the undertaking of appropriate risk assessments and inclusion of mitigation measures in the design and construction process. It is particularly important to avoid the location of new wind turbines on deep peat land.

We recommend you include the following policy relating to water catchment land.

'Water Catchment Land

Development proposals on land used for public water supply catchment purposes will be required to consult with the relevant water undertaker. The first preference will be for proposals to be located

away from land used for public water supply purposes. Where proposals are proposed on catchment land used for public water supply, careful consideration must be given to the location of the proposed development and a risk assessment of the impact on public water supply may be required with the identification and implementation of any required mitigation measures.'

For any site specific allocations that you may identify which fall in such locations, it will be important that adequate information is presented to justify the principle of the development in advance of allocation and that the proposal is covered by site-specific detail which clearly identifies this constraint and the need for proposals to be undertaken in accordance with the above recommended policy.

Development near to Wastewater Treatment Works and Pumping Stations

During the site-selection process, we would urge you to carefully consider our existing wastewater treatment works and pumping stations. It is important to explain that:

- Wastewater treatment works are key infrastructure for the borough which may need to expand in the future to meet growth needs or respond to new environmental drivers. Maintaining a space around a treatment works is therefore desirable to respond to any future investment requirements.
- As a waste management facility, a wastewater treatment works is an industrial operation which can result in emissions. These emissions include odour and noise. A wastewater treatment works can also attract flies. A wastewater treatment works is also subject to vehicle movements from large tankers which need to access the site.

The position of UUW is that when considering a range of sites to meet development needs, it is more appropriate to identify new development sites, especially sensitive uses, which are not close to a wastewater treatment works. This position is in line with the 'agent of change' principle set out at paragraph 187 of the NPPF. Paragraph 187 states:

'Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.'

Paragraph: 009 Reference ID: 30-009-20190722 of the National Planning Practice Guidance expands on this by stating:

Development proposed in the vicinity of existing businesses, community facilities or other activities may need to put suitable mitigation measures in place to avoid those activities having a significant adverse effect on residents or users of the proposed scheme.

In these circumstances the applicant (or 'agent of change') will need to clearly identify the effects of existing businesses that may cause a nuisance (including noise, but also dust, odours, vibration and other sources of pollution) and the likelihood that they could have a significant adverse effect on new residents/users. In doing so, the agent of change will need to take into account not only the current activities that may cause a nuisance, but also those activities that businesses or other facilities are permitted to carry out, even if they are not occurring at the time of the application being made.

The agent of change will also need to define clearly the mitigation being proposed to address any potential significant adverse effects that are identified. Adopting this approach may not prevent all complaints from the new residents/users about noise or other effects, but can help to achieve a satisfactory living or working environment, and help to mitigate the risk of a statutory nuisance being found if the new development is used as designed (for example, keeping windows closed and using alternative ventilation systems when the noise or other effects are occurring).

It can be helpful for developers to provide information to prospective purchasers or occupants about mitigation measures that have been put in place, to raise awareness and reduce the risk of post-purchase/occupancy complaints.

Similarly Paragraph: 005 Reference ID: 34-005-20140306 of the NPPG states:

Plan-making may need to consider:

 whether new development is appropriate near to sites used (or proposed) for water and wastewater infrastructure (for example, odour may be a concern).

On the basis of the above, we wish to recommend the following policy for inclusion in any new local plan.

'New development should ensure that the occupiers of new developments will enjoy an appropriate standard of amenity and will not be adversely affected by neighbouring uses and vice versa. When applicable, applicants will be required to submit the relevant impact assessments, outlining any adverse effects from the neighbouring site, and any required mitigation.'

Our wastewater treatment works in High Peak include:

- Tintwistle;
- Glossop;
- Rowarth;
- Hayfield;
- Whaley Bridge;
- Chapel-en-le-Frith; and
- Crowden Camp Site.

Plans of a selection of these sites will follow by separate cover.

We request the opportunity to liaise closely with the Council on potential site allocations so we can advise you of any concerns associated with proximity to our wastewater assets (treatment and network (such as pumping stations and combined sewer overflows)).

Investment in Future Infrastructure

UUW requests the support of the Council for future investment in infrastructure in order to be able to expediently respond to the infrastructure needs. UUW wishes to highlight that it owns assets which are currently situated in protected areas such as open countryside or Green Belt. Upgrades to these assets may be required in the near future, and it is important to ensure that any required upgrades and expansions to these sites can be made in order for us to meet the infrastructure requirements of proposed future development in the region and future environmental drivers.

It is worth noting that the Environment Act 2021 places an obligation on sewerage undertakers in England to secure a progressive reduction in the adverse impacts of discharges from storm overflows to reduce the impacts on the environment and public health. This obligation has triggered the need for significant future investment in our wastewater assets (treatment and network). This investment will often be constrained by engineering circumstances to determine the most appropriate location for additional storage to reduce spills. This may necessitate investment away from existing treatment facilities such as in the green belt, the open countryside and green areas in or adjacent to existing settlements.

Consistent with meeting its obligations, UUW requests that local development plan policy is worded to recognise that utility sites, located within protected land, are appropriate for development for operational purposes. Our preference would be for this principle to be reflected in policy and through designation of existing sites on the Proposals Map. We also request wider support for water and wastewater infrastructure investment that is ultimately beneficial to the environment, biodiversity, watercourses and growth so that our investment can be delivered in the most timely and effective manner. The following policy wording is recommended:

'The Council will support water and wastewater infrastructure investment which facilitates the delivery of wider sustainable development and the meeting of environmental objectives of water and sewerage undertakers including development proposals for water and wastewater infrastructure in protected areas such as the Green Belt, open countryside or in existing green spaces, where the investment is needed to respond to future growth and environmental needs.'

This policy would enable us to ensure we can continue to meet the growth and development aspirations of the region, by ensuring that fundamental infrastructure requirements are met and that we are able to respond to the need for investment in our assets to protect the environment and reduce flood risk.

UUW Property Interests

We would wish to assess any possible future development sites to determine whether we have any loand interests such as easements and rights of access which are in addition to our statutory rights for inspection, maintenance and repair. These land interest may have restrictions that must be adhered to. It is the responsibility of the developer to obtain a copy of the associated legal document, available from United Utilities' Legal Services or Land Registry and to comply with the provisions stated within the document.

We recommend that landowners/developers contacts our Property Services team at PropertyGeneralEnquiries@uuplc.co.uk to discuss how any proposals may interact with our land interests. Our easements, pipe structures and access rights should not be affected by the design and construction of new development.

Reservoir Flooding

There are a number of reservoirs within High Peak, each with its own reservoir flooding zone, showing how far flood water would spread from the reservoir in the unlikely event that a reservoir failed. These maps are available on the Environment Agency website at https://flood-warning-information.service.gov.uk/long-term-flood-risk/map.

When looking at possible future development allocations within a reservoir flood zone, we draw your attention to the advice within the National Planning Practice Guidance on Flood Risk and Coast Change.

This states that the local planning authority will need to evaluate the potential damage to buildings or loss of life in the event of dam failure, compared to other risks, when considering development downstream of a reservoir.

Local planning authorities will also need to evaluate in Strategic Flood Risk Assessments (and when applying the Sequential Test) how an impounding reservoir will modify existing flood risk in the event of a flood in the catchment it is located within, and/or whether emergency draw-down of the reservoir will add to the extent of flooding.

If considering allocating land for development within a reservoir flood zone, local planning authorities should also discuss their proposed site allocations with reservoir undertakers (such as UUW) at the earliest opportunity, in order to:

- avoid intensification of development within areas at risk from reservoir failure; and
- ensure that reservoir undertakers can assess the cost implications of any reservoir safety improvements required due to changes in land use downstream of their assets.

Developers should be expected to cover any additional costs incurred, as required by the National Planning Policy Framework's 'agent of change' policy (paragraph 187). This could be through Community Infrastructure Levy or section 106 obligations for example.

Once your potential draft allocations are available for review, we will be able to provide you with further comment in relation to the risk of flooding from reservoirs.

Biodiversity Net Gain (BNG)

As part of our response to the Environment Act and in preparation for the future delivery of BNG, we are currently reaching out to local authorities to ensure we develop a BNG strategy that, wherever possible, supports local biodiversity and nature recovery needs. We are currently evaluating all land owned by UUW within local authorities that could be used for habitat creation or enhancement works and developing a list of candidate sites. In identifying land, we clearly recognise the strategic importance of aligning our site selection process with local, regional and national policies and objectives on biodiversity and nature recovery. As part of the preparation of your new local plan, we would welcome the opportunity to further discuss your approach to the delivery of BNG and the identification of strategic opportunities to support local nature recovery.

If you are considering a policy relating to BNG, we request that your policy includes sufficient flexibility to allow for off-site provision. This is particularly in respect of existing and new infrastructure sites. Onsite provision may not be the most appropriate long term solution for the delivery of BNG when investing in key infrastructure such as water and wastewater assets. It is critical that land at and around our key infrastructure sites is not sterilised to ensure that we are able to flexibly and most appropriately respond to future growth and environmental drivers. This approach is supported by the planning practice guidance which states that the approach to BNG should be resilient to future pressures from further development. It states:

'When assessing opportunities and proposals to secure biodiversity net gain, the local planning authority will need to have regard to all relevant policies, especially those on open space, health, green infrastructure, Green Belt and landscape. It will also be important to consider whether provisions for biodiversity net gain will be resilient to future pressures from further development or climate change, and supported by appropriate maintenance arrangements.

Paragraph: 023 Reference ID: 8-023-20190721

Revision date: 21 07 2019'

We also wish to note that biodiversity mitigation / enhancement should not be located directly over water and wastewater assets or where excavation onto the asset would require removal of the biodiversity.

New Renewal Energy Opportunities

We are currently evaluating all land owned by UUW within local authorities that could be used for renewable energy and developing a list of candidate sites. In identifying land, we clearly recognise the strategic importance of aligning our site selection process with local, regional and national policies and objectives on renewable energy and net zero. As part of the preparation of your new local plan, we would welcome the opportunity to further discuss your approach to the delivery of renewable energy sites and the identification of new opportunities.

Summary

Moving forward, we respectfully request that the council continues to consult with UUW for all future planning documents. We are keen to continue working in partnership with High Peak Borough Council to ensure that all new growth can be delivered sustainably. In the meantime, if you have any queries or would like to discuss this representation, please do not hesitate to contact me.

Yours faithfully

Andrew Leyssens Planning, Landscape and Ecology **United Utilities Water Limited**

Encl. Water Resources West Evidence



WATER EFFICIENCY IN NEW HOMES

Evidence to support adoption of the Building Regulations Optional Requirement for local authorities in North West England and the Midlands

Background

Water is essential for life - yet here in the UK (as in many regions across the world) the future availability of water is a concern. The area covered by Water Resources West is an area the Environment Agency has described as having 'moderate water stress'; water scarcity/stress occurs when demand is high compared to the water that is available¹.

Population growth, climate change and environmental protection measures all put pressure on water resources and contribute to water stress in our region. On top of this, housing shortages mean that lots more housing is needed today and in the future. Hence, planning policy is a vital tool to help ensure long term sustainable management of water supplies, as well as helping protect our local rivers and wildlife. Achieving a balance between these conflicting demands is a challenge for us all.

Water Efficiency Standards for New Homes

The Code for Sustainable Homes was launched in 2006 to help reduce UK carbon emissions and create more sustainable homes; it was the national standard for use in the design and construction of new homes in the UK and is still referred to in older Local Plans. In 2015 it was withdrawn and some of its standards were consolidated into Building Regulations including the requirement for all new dwellings to achieve a water efficiency standard of 125 litres of water per person per day (l/p/d). In the same year, the Government updated Building Regulations Part G, introducing an 'optional' requirement of 110 l/p/day for new residential development, which should be implemented through local policy where there is a clear need based on evidence. (See Appendix 1).

In 2018, Welsh Government amended building regulations so that new builds are built to a standard of 110 $l/p/d^2$. In England however the standard of 110 l/p/d needs to be adopted as a local policy by each planning authority in its local plan before it can take effect.

In 2020, the government published a White Paper on future planning³ in England. The focus is on clear requirements and standard approaches. It clear that water will remain an important consideration and that "sustainable development" will be a key test.

The Need for Water Efficiency in New Homes

The Water Framework Directive (WFD) was adopted into UK Law in 2003. It was designed to change water management for the better by putting aquatic ecology at the heart of all management decisions. One of the most important features of the WFD is that it encourages public consultation, meaning everyone can have a say in what is needed to protect our water resources. It also takes into account the environmental, economic and social implications of any such investment/decisions.

Delivery of the WFD objectives in our region is set out in River Basin Management Plans for the Solway Tweed, North West, Dee, Severn and Humber River Basins. These documents highlight a number of issues that are affecting the achievement of the WFD objectives, one of these is the pressures from water supply. Thus, there are a variety of reasons why water efficiency is important for Local Authorities.

¹Water stressed areas – final classification, Environment Agency and Natural Resources Wales, July 2013

² The Building (Amendment) (Wales) Regulations 2018

³ Planning for the future, Ministry of Housing, Communities and Local Government, August 2020

Local Authorities have a duty of care for communities and the environment and the reduction in water use can help to minimise the quantity of water taken from the environment as well as helping to control customer bills. There are some important factors to consider in this regard:

- The general Duty to Co-operate⁴ can also apply to water efficiency and, across the region, there are several examples of exemplar project partnerships between Local Authorities and water companies.
- The National Planning Policy Framework⁵ Section 2 requires strategic policies to make sufficient provision for water supplies. Section 14 of the NPPF concerns "Meeting the challenge of climate change, flooding and coastal change" and paragraph 149 make specific reference to water supply within this context. Paragraph 170 goes on the set out that planning policies and decisions should contribute to and enhance the natural and local environment including water. For reference we have included specific government guidance in relation to the optional standard in Appendix 2.
- Local Authorities must "have regard to the River Basin Management Plans and any supplementary plans in exercising their functions" and this includes taking action on water efficiency.
- The production of mains water requires significant energy and chemical inputs and hence reducing demand for water can contribute significantly to reducing carbon emissions, especially where those savings are of hot water.

Why do we need to save water?

The areas covered by Water Resources West are classed as an area under 'water stress' by the Environment Agency (Table 1). While local planning authorities are encouraged to draw on this existing evidence to establish the need for possible action government makes clear that this should not be the only consideration⁶ – not least because current maps were not developed to establish areas where additional controls were required on new homes. A requirement for a higher water efficiency standard within a local plan should also follow on from consultation with the local water supplier and the Environment Agency. Additional reasons for the local need for action highlighted by the Environment Agency and the local water suppliers are set out below.

Table 1. Water Stress Classification for current and future scenarios¹ (L=low stress; M=moderate stress; S=serious stress). The four scenarios represent the range of pressures on water resources from climate change and future demands.

Water company area	Current Stress	Future Scenario 1	Future Scenario 2	Future Scenario 3	Future Scenario 4
Dwr Cymru Welsh Water	М	M	M	M	M
Severn Trent	M	M	M	M	М
South Staffs Water	M	M	M	M	М
United Utilities	M	M	M	M	M

⁴ Section 110 of the Localism Act sets out the 'Duty to Co-operate'. It requires cooperation between local planning authorities and other public bodies to maximise the effectiveness of policies for strategic matters in Local Plans. Even if the formal duty is removed in future legislation, the August 2020 White Paper³ makes it clear that strategic, cross-boundary issues should still be considered in the context of sustainable development.

⁵ National Planning Policy Framework, Ministry of Housing, Communities & Local Government, February 2019

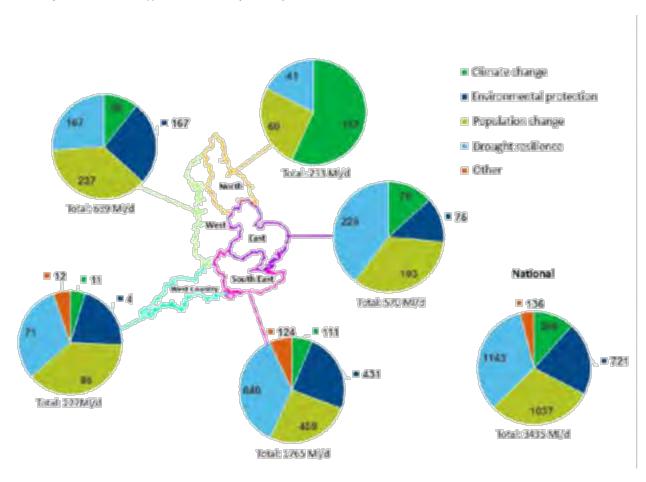
⁶ Housing Standards Review Consultation, Department for Communities and Local Government, August 2013

In March 2020, the Environment Agency published the National Framework for Water Resources⁷. This identifies strategic water needs for England and its regions across all sectors up to and beyond 2050. The National Framework identifies that our region faces the second highest pressures on Water Resources. Significantly, the National Framework identifies that increased consumption, driven by population increases, is the largest driver of additional water need in the region. Increased public water supply drought resilience, increased protection for the environment and the impact of climate change reducing water availability of existing supplies also have impacts on water availability (Figure 1).

Based on the best available evidence the National Framework adopted a planning assumption of reducing *average* per capita consumption (PCC) to 110 l/p/d by 2050 nationally. Water Resources West's projections are broadly consistent with that, with average per capita consumption reducing to 111 l/p/d by 2050⁸. These projections are based on forecasts made for the water companies' 2019 WRMPs.

Even with these reductions in consumption, parts of our region will need new water resources to be developed⁸. If the planned reductions are not achieved then more significant and more costly water resources will need to be developed. It is therefore important the measures are taken across the region to support the achievement of the lower per capita consumption.

Figure 1. Extract from the National Framework⁷ showing how population growth results in Water Resources West having the second highest pressure on water resources in England. Numbers in the pie charts show the additional water needed by 2050 due to different drivers (in MI/d).



⁷ Meeting our future water needs: a national framework for water resources, Environment Agency, March 2020

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⁸ Initial Resource Position, Water Resources West, March 2020

Public concern also highlights the need to support water saving. Surveys⁹ of water users in North West England and the Midlands have shown that, while there is little general awareness of the issues, once informed 70% are concerned about water scarcity. In addition to running out of water, customers are worried about the potential impact on water bills, restrictions and wastage

Water Framework Directive requirements are set out in River Basin Management Plans. Water efficiency measures have a direct effect in reducing the abstraction from water bodies assessed in those plans. Abstraction in turn affects the hydrological regime of those water bodies. River Basin Management Plans for the Solway Tweed, North West, Dee, Severn and Humber River Basins identify that there are waterbodies within all those areas for which the hydrological regime does not support good status. In turn the hydrological regime can affect water quality, species and habitats.

Changes to the natural flow and level of water is identified as a significant water management issue. Reduced flow and water levels in rivers and groundwater caused by human activity (such as abstraction) can mean that there is not enough water for people to use and wildlife might not be able to survive. Reduced flow affects the health of fish and exaggerates the impacts of barriers such as weirs.

River Basin District	Percentage of surface water bodies <u>not</u> achieving good ecological status or potential	Percentage of groundwater bodies <u>not</u> achieved good quantitative status
Solway Tweed¹º	54% (305 out of 560)	28% (18 out of 64)
North West ¹¹	78% (480 out of 613)	11% (2 out of 18)
Humber ¹²	86% (839 out of 987)	25% (13 out of 51)
Severn ¹³	80% (604 out of 755)	21% (9 out of 42)
Dee ¹⁴	73% (68 out of 93)	0% (0 out of 5)

Table 2. WFD classification of waterbodies in 2015 River Basin Management Plans

Summary of evidence on the need for the optional water efficiency standard

As we have seen above, there is a range of evidence on the water stress across the North West and the Midlands. This means there is a clear need for the 110 l/p/d water efficiency standard.

For inclusion in a local plan a local planning authority must be able to demonstrate at examination of the plan that the standard is required to address a clear need and as part of an approach to water efficiency that is consistent with a wider approach to water efficiency as set out in the local water undertaker's water resources management plan. We recommend that the following evidence is cited:

- The classification of moderate water stress for the water supplier in your area (Table 1).
- The National Framework for water resources noting that Water Resources West faces the second highest pressures on water resources in England due largely to population growth⁷.
- The National Framework for water resources planning assumption of 110 l/p/d7.
- The consistency between these planned reductions in consumption between the National Framework, Water Resources West's plans and your water supplier's WRMP8.

⁹ Customer Survey for Severn Trent, Thames Water and United Utilities, Verve, July 2018

¹⁰ River basin management plan for the Solway Tweed river basin district: 2015 update, Environment Agency and Natural Scotland, 21 December 2015

¹¹ River basin management plan, Part 1: North West river basin district, Environment Agency, December 2015

¹² River basin management plan, Part 1: Humber river basin district, Environment Agency, December 2015

¹³ River basin management plan, Part 1: Severn river basin district, Environment Agency, December

¹⁴ <u>Dee River Basin Management Plan 2015 – 2021, Proposed Summary</u>, Natural Resources Wales and Environment Agency, October 2015

- High levels of public concern (70%) in the region, when informed about issues of water scarcity9.
- Reference to the WFD ecological status of water bodies in your River Basin District, with changes to flow and level recognised as a significant water management issue in the River Basin Management Plan (Table 2).

Water Companies

A consequence of the population and housing growth in our region has meant that water companies have been asked to accommodate the new growth, yet at the same time their abstraction licenses are being reduced. Therefore it is vital that water companies support and are supported in initiatives to help get 110 l/p/d in planning policies across local authorities in the region, to help meet their requirement to supply their customers. The water companies in Water Resources West are Dwr Cymru Welsh Water, Severn Trent, South Staffs and United Utilities.

In preparing your local plan you should consult with your local water supply company on specific local issues.

New Homes

The scale of new development that is needed across our region is immense - the Government aiming for delivery of 300,000 new homes a year across England¹⁵. Within Water Resources West's region we estimate that there will be 1.6 million new properties by 2050. Yet at the same time there is need to share the already scarce water resources - therefore the need for implementing at least 110 l/p/d into local plans and policies is apparent.

Impact on viability

The cost of installing water-efficient fittings to target a per capita consumption of 110l/d has been estimated as a one-off cost of £9 for a four bedroom house 16 . Research undertaken for the Welsh Government indicated potential annual savings on water and energy bills for householders of £24 per year as a result of such water efficiency measures 17 .

The Consumer Council for Water notes that the discretionary, tighter (building) standard of 110 l/p/d is something that should be pursued, also bearing in mind that saving water is not the only a driver of water efficiency¹⁸. This is because water efficiency could also have a positive effect on reducing energy bills, water bills of metered customers and carbon emissions.

The Greater London Authority carried out a survey of developers to test the viability of the 110 l/p/d standard. The results of this survey¹⁹ made it clear that those associated with the development industry did not consider that the proposed changes would have any impact on building.

Viability is also evidenced by the examples from other local authorities who have adopted the standard. South Worcestershire adopted the 110 l/p/d standard in its February 2016 local plan. The standard remains the preferred option for next local plan. See the case study below. Bromsgrove and Redditch councils cooperated to require the 110 l/p/d standard for certain developments in their plans which were adopted in January 2017. Another example is Nottingham City Council who adopted the 110 l/p/d standard for all new dwellings in January 2020.

¹⁵ Planning for the Future, Ministry of Housing, Communities and Local Government, March 2020

¹⁶ Housing Standards Review Cost Impacts, Department for Communities and Local Government, September 2014

¹⁷ Advice on water efficient new homes for England, Waterwise, September 2018

¹⁸ Response to Defra consultation on measures to reduce personal water use, Consumer Council for Water, October 2019

¹⁹ <u>Greater London Authority Housing Standards Review: Evidence Of Need</u>, David Lock Associates, May 2015

Water efficiency is therefore not only viable but of positive economic benefit to both private homeowners and tenants.

Water Calculator

The Water Calculator was developed to help provide a working example of the calculator used for part G of the building regulations. It uses the method set out in the 'Water Efficiency Calculator for New Dwellings'²⁰. The Water Calculator contains information on water consumption for hundreds of products, enabling quick and easy specification, without the hassle of gathering data from several product manufacturers. To access the water calculator visit: www.thewatercalculator.org.uk

Case study

South Worcestershire's current local plan was adopted, following examination, in February 2016²¹. It is a major sub-regional land use plan, prepared jointly by the three South Worcestershire Councils; Malvern Hills, Worcester City and Wychavon working together. Within the local plan, policy SWDP3oc states that "for housing proposals, it must be demonstrated that the daily non-recycled water use per person will not exceed 110 l/p/d". The reasoned justification for this policy highlights the following factors:

- This policy is central to the council's response to the Framework, which advocates that local plans
 incorporate strategies to mitigate and adapt to climate change, in line with the objectives and
 provisions of the Climate Change Act 2008 over the longer term. This includes factors such as flood
 risk, water supply and changes to biodiversity.
- Without effective local planning and risk management, the consequences of climate change may also have a significant detrimental impact on budgets and service delivery. It may also compromise the Government's ability to meet the statutory requirements under the Climate Change Act 2008.
- Local planning authorities have a general responsibility not to compromise the achievement of United Kingdom compliance with the Water Framework Directive (WFD(68)) (Directive 2000/60/EC). More specifically, the local plan has to take into account the River Severn Basin Management Plan, which in itself is a requirement of the WFD. All surface water bodies need to achieve "good ecological status" by 2015.
- The Localism Act 2011 enables the UK government to require local authorities to pay if their inaction results in a failure to meet WFD requirements.
- The Localism Act 2011 also requires local planning authorities to co-operate on strategic cross-boundary matters, for example the provision of water supply infrastructure, water quality, water supply and enhancement of the natural environment. Consequently, there is a need for developers to engage positively with the local water supplier to ensure that all the necessary infrastructure is secured, so as to ensure that there is no deterioration in the quality or quantity of water of the receiving water body(ies) and to avoid delays in the delivery of development.
- The 2006 Natural Environment and Rural Communities (NERC) Act imposes a duty on local planning authorities to have regard to conserving biodiversity in carrying out all of their functions.
- The South Worcestershire Water Cycle Study looks at the level of planned growth and the ability of the infrastructure (i.e. water supply and waste water treatment) to accommodate it without adversely affecting the natural water cycle. It identifies an overall shortage in future water supplies that necessitates the delivery of minimum water efficiency targets.
- The effective management of water is considered critical in the pursuit of sustainable development and communities. It reduces the impact flooding can have on the community, maintains water quality and quantity and helps to enhance local amenity / property value and biodiversity through the provision of Green Infrastructure. Effective water management also reduces the movement of water and sewage, thereby reducing energy requirements. Development proposals incorporating grey

²⁰ Appendix A of <u>Approved Document G, The Building Regulations 2010</u>, HM Government 2015 edition with 2016 amendments

²¹ South Worcestershire Development Plan, Adopted, February 2016.

water recycling will therefore be supported and opportunities for the retrofitting of water efficiency measures will be encouraged.

The South Worcestershire Councils are currently preparing the next local plan. Following consultation its Preferred Options report²² was published in November 2019. In relation to water efficiency the preferred option is to require new dwellings to meet the tighter Building Regulations optional requirement of 110 l/p/d as per the adopted policy.

Recommendations

There is firm evidence in across the North West and the Midlands that clearly justifies the need for more stringent water efficiency targets for new residential development. Local Authorities should consider all the factors in their local plans and we strongly recommend they adopt 110 l/p/d for water efficiency using the suggested wording below:

All new residential development must achieve as a minimum the optional requirement set through Building Regulations for water efficiency that requires an estimated water use of no more than 110 litres per person per day.

Past experience has shown that successful adoption of 110l/p/d in local plans requires the following:

- Significant engagement and consultation is required in developing local plans, including engagement with key stakeholders and public sector partners, responsible for delivering a range of services and infrastructure.
- 2. Recommend local plans are subject to public consultations (many people are concerned about water) and that where appropriate, comments from the public help shape the contents of this plan and helps with public buy-in.
- 3. Local plans should actively encourage the design of new buildings that minimise the need for energy and water consumption, use renewable energy sources, provide for sustainable drainage, support water re-use and incorporate facilities to recycling of waste and resources.
- 4. Local plans should have a positive approach to the adaptation of climate change
 - o by avoiding development in areas at greatest risk of flooding, and
 - o promoting sustainable drainage, and
 - o challenging water efficiency standards.

²²South Worcestershire Development Plan Review, Preferred Options Consultation, November 2019.

Appendix 1. Extract from Part G of the Building Regulations

Extract from Part G of Building Regulations Optional requirement The optional requirement only applies where a condition that the dwelling should meet the optional requirement is imposed as part of the process of granting planning permission. Where it applies, the estimated consumption of wholesome water calculated in accordance with the methodology in the water efficiency calculator, should not exceed 110 litres/person/day. The person carrying out the work must inform the BCB where the optional requirement applies. 2.10 As an alternative to calculating the water consumption (as paragraph 2.8), a fittings approach that is based on the water efficiency calculator methodology may be used. 2.11 Where the fittings approach is used, the water consumption of the fiftings provided must not exceed the values in Table 2.2. If they do, the water efficiency calculator must be completed to demonstrate compliance. Similarly, where a M M Gowney shower is not to be provided or where a waste disposal unit, a water softener or water re-use is to be provided the water efficiency calculator must be completed. The District Pay Labour 2010 2.12 Where the fittings approach is used, the Sanitations hot water safety notice given under regulation 37 should state "Less than 110 litres/person/day using fittings and water efficiency approach". Table 2.2 Maximum fittings APPROVED DOCUMENT consumption optional requirement level Water fitting Maximum consumption WC 4/2.6 ittres dual flush Shower 8 Pmin Bath 170 litres 5 Vmin Basin taps Sink taps 6 I/min Dishwasher 1.25 Uplace setting Washing machine 8.17 Vkilogram For use in English C

Appendix 2 NPPF Planning Practice Guidance Housing: optional technical standards, Water efficiency standards²³

Can local planning authorities require a tighter water efficiency standard in new dwellings?

In setting out how the planning system should contribute to the achievement of sustainable development, the National Planning Policy Framework and guidance makes clear this includes planning to provide the high quality housing required to meet the needs of present and future generations, and helping to use natural resources prudently. The Framework's policies expect local planning authorities to adopt proactive strategies to adapt to climate change that take full account of water supply and demand considerations. Early engagement between local planning authorities and water companies can help ensure the necessary water infrastructure is put in place to support new development. See water supply guidance. The local planning authority may also consider whether a tighter water efficiency requirement for new homes is justified to help manage demand.

Paragraph: 013 Reference ID: 56-013-20150327

Revision date: 27 03 2015

What standard should be applied to new homes?

All new homes already have to meet the mandatory national standard set out in the Building Regulations (of 125 litres/person/day). Where there is a clear local need, local planning authorities can set out <u>Local Plan</u> policies requiring new dwellings to meet the tighter Building Regulations optional requirement of 110 litres/person/day.

Paragraph: 014 Reference ID: 56-014-20150327

Revision date: 27 03 2015

How should local planning authorities establish a clear need?

It will be for a local planning authority to establish a clear need based on:

- existing sources of evidence.
- consultations with the local water and sewerage company, the Environment Agency and catchment partnerships. See paragraph 003 of the water supply guidance
- consideration of the impact on viability and housing supply of such a requirement.

Paragraph: 015 Reference ID: 56-015-20150327

Revision date: 27 03 2015

What are the existing sources of evidence?

Primary sources of evidence which might support a tighter water efficiency standard for new dwellings are:

- The Environment Agency <u>Water Stressed Areas Classification (2013)</u> which identifies areas of serious water stress where household demand for water is (or is likely to be) a high proportion of the current effective rainfall available to meet that demand.
- Water resource management plans produced by water companies.
- <u>River Basin Management Plans</u> which describe the river basin district and the pressure that the water environment faces. These include information on where water resources are contributing to a water body

²³ https://www.gov.uk/guidance/housing-optional-technical-standards#water-efficiency-standards

being classified as 'at risk' or 'probably at risk' of failing to achieve good ecological status, due to low flows or reduced water availability.

In addition to these primary data sources, locally specific evidence may also be available, for example collaborative 'water cycle studies' may have been carried out in areas of high growth.

Paragraph: 016 Reference ID: 56-016-20150327

Revision date: 27 03 2015

Where can I find out more about the water efficiency standard?

See further information on the water efficiency standard.

Paragraph: 017 Reference ID: 56-017-20150327

Revision date: 27 03 2015



HIGH PEAK LOCAL PLAN EARLY ENGAGEMENT RESPONSE FORM

Responses invited from 19th January 2023 to 5pm on 3rd March 2023

The Local Plan sets out detailed policies and specific proposals for the development and use of land in High Peak (outside of the Peak District National Park). Your feedback will help the Council to identify the issues and options for the Local Plan for consultation later in 2023.

Your Contact Details:

	Personal details	Agent's details (if applicable)
Title	Ms	Mr
Name	Claire Campbell	Niall Mellan
Job title (if applicable)	Senior Land Manager	Associate
Organisation (if applicable)	Wain Homes North West	Hourigan Planning
Address		
Post code		
Telephone		
no.		
Email address		

PLEASE NOTE that responses must be attributable to named individuals or organisations. They will be held by the Council and will be available to view publicly and cannot be treated as confidential. Your contact details will not be published, but your name and organisation (if relevant) will. High Peak Borough Council maintains a database of consultees who wish to be kept informed about the Local Plan. Details of our data protection and Privacy Notice can be found on the council's website at: https://www.highpeak.gov.uk/YourData

Please complete and return this form by 5pm on 3rd March 2023

by email to: ldf@highpeak.gov.uk; or

by post to: Planning Policy, High Peak Borough Council, Town Hall, Buxton,

Derbyshire, SK17 6EL

Alternatively, you can respond online on the Local Plan consultation website https://highpeak-consult.objective.co.uk/kse.

Question 1

Do you agree with the Council's initial view of the emerging issues identified from the new evidence? (please select one answer)
Yes No X
The emerging issues do not adequately acknowledge the deficiencies in market housing and affordable housing provision since the start of the Plan Period in 2011. With reference to the pink text box on Page 2, it is misleading to say that the Local Plan has helped to develop 2,149 homes since 2016, including 432 affordable homes for the following reasons.
In relation to market housing, the true picture ought to be measured against the existing Local Plan requirement of 350 dwellings per annum which the Council has consistently failed to meet. Table 9.11 of the HELNA 2022 demonstrates a significant shortfall in completions compared to the housing requirement for the past 10 years. The Council's total housing requirement between 2011/12 to 2021/22 was 3,500 however only 2,412 were delivered which is a shortfall of 1,088 dwellings i.e. 31%. The average annual housing requirement of 350 has only been achieved twice since 2011.
In relation to affordable housing, if 432 homes have been completed from 2016/17 to 2021/22 then that amounts to 72 dwellings per annum (432 / 6). Looking back at previous evidence the affordable housing need for High Peak has been significantly more than this i.e. between 443-591 dwellings per annum (Joint Housing Needs Survey 2006) and 526 dwellings per annum (High Peak SHMA and Housing Needs Study April 2014). This demonstrates that the amount of affordable homes that have been delivered (432) is nowhere near what the Council's previous evidence base said was the need.
The current evidence in the HELNA 2022 is that affordable housing need is between 228-270 per annum between 2021 and 2041 (4,560 $-$ 5,400 over the Plan period) which again is significantly more than recent affordable housing completions in the Borough i.e. 72 dwellings per annum on average. Put simply if the affordable homes completions trend continues the annual affordable shortfall against identified need would be between 144 $-$ 198 affordable homes per annum. Over a 20 year period that would quate to an affordable housing shortfall of between 2,880 and 3,960 dwellings.
[Continues overleaf]

It is unrealistic for the Council to expect anywhere near the identified affordable housing need of 228-270 dwellings to be met were it to proceed on the basis of an overall housing requirement in a Local Plan Up-Date which only equates to the locally assessed housing need figure under the standard method of 260 dwellings per annum as affordable housing needs are between 88% and 104% of the overall housing need. Moreover Page 15 acknowledges viability issues in the area noting that: "Due to development viability issues, it is highly unlikely that this level of affordable housing delivery can be achieved in full".

Even if 30% (the proposed affordable housing policy threshold) of all dwellings for the 20 year Plan period came forward as affordable (which of course is unrealistic given that small sites will contribute very little or no affordable homes) then the best that could be achieved would be 1,560 affordable homes ($5,200 \times 20\% = 1,560$) for the Plan period i.e. 3,000 affordable units short of the minimum affordable housing need. This clearly demonstrates that there is an acute affordable housing problem in High Peak and one that might be addressed in some respect by increasing the overall level of housing to be planned for.

Question 2 Should the next Local Plan have a new Spatial Vision? (please select one answer)

Yes	Х
No	

If so, what should it say?

As a general point, a settlement hierarchy should be defined in the Spatial Vision e.g. Market Towns, Larger Villages, Smaller Villages and Other Rural Areas.

There should be a clear emphasis that the affordable housing issue in High Peak needs to be addressed.

In the 2nd paragraph of the current Spatial Vision it is not necessary to name specific villages under Larger Village i.e. Chinley and Hayfield and we suggest that these are removed in favour of using categories from a defined spatial hierarchy.

In the 3rd paragraph, the vision for villages should allow for some market housing as well as affordable housing otherwise the villages will fall into decline especially having regard to poor past performance in terms of affordable housing delivery

Question 3 What should be the Strategic Objectives for the next Local Plan?

A priority strategic objective for the Local Plan should be to deal with the deficiencies in market housing and affordable housing provision in High Peak. This can be achieved by releasing more suitable land for housing. There is clear evidence that the Council should adopt an alternative higher housing requirement than the standard method to help address issues such as affordable housing and an aging population. The alternative housing requirement of 364 dwellings per annum suggested in Page 15 of the consultation document should be the minimum the Council should plan for.

The National Planning Policy Framework 2021 (Framework) states as follows at Paragraph 61 *inter alia* (emphasis added):

"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – <u>unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals."</u>

Whilst we acknowledge that the consultation draft of the amended Framework 2023 carries no weight at present it states as follows at paragraph 61 *inter alia* (emphasis added):

"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area (see paragraph 67 below). There may be exceptional circumstances relating to the particular characteristics of an authority which justify an alternative approach to assessing housing need; in which case the alternative used should also reflects current and future demographic trends and market signals.

Clearly existing national policy and emerging national policy (if adopted in its current form) allows for Councils to set higher housing requirements than need established from the standard method.

Question 4

upda	there any other policies in the Local Plan that you think should be ated? ase select one answer)
Yes	
No	x
Plea	se specify which policy and how it should be updated.
Are t	stion 5 there any other new policies that you think the next Local Plan should ude? use select one answer)
No	X
Plea	se specify what the new policy should seek to address and why.

Question 6 What other evidence should the Council consider to inform the next Local Plan?			

Question 7 & 8 Do you have any site suggestions for housing and / or employment?

If you would like to suggest several sites, please submit a separate form for each one.

What is your interest in the site? (please select all that apply)		
Owner of the site		
Parish / Town Council		
Local resident		
Amenity / Community Group		
Planning Consultant	Х	
Land Agent		
Developer	X	
Other		
Other (please specify)		
Are you the sole or part owner of the site? (please select one answer)		
Sole Owner		

Part Owner	
Neither	Х
If you are not the landowner or the site is in multiple owner the name, address and contact details of the land owner (sprovided	
If not the landowner, I confirm that the landowner/s have site submission (please select one answer)	been informed of this
Yes	X
No	
Does the owner(s) support the development of the site? (please select one answer)	
Yes	X
No	
Site location (including grid reference and postcode if known	own)
Land South Of Dinting Vale, Glossop, SK13 6NY Grid Reference X (Easting) 401952, Y (Northing) 394171)	
The site forms part of a housing allocation in the adopted Local Plan i.e. (Adderley Place, Glosson), Please refer to the Location Plan submitted a	

Site Area (hectares)	
4.7	
Current Land Use(s) e.g. agriculture, employr	nent, unused/vacant etc.
The site is currently used for horse grazing.	
Type of site e.g. greenfield, previously develo	pped land/brownfield
Greenfield	
Please provide a site plan clearly identifying t	the exact boundaries of the site.
See attached.	
Proposed Future Uses & Potential Site Capac (please select all that apply)	ity (please specify)
Housing	X
Employment	
Mixed-use (please specify uses)	
Self-build & custom-build housing	

Basic Capacity Information – area/number of dwellings/number of units/proposed floorspace

92 dwellings based on current planning application HPK/2022/0456.	
Market interest - please choose the most appropriate ca indicate what level of market interest there is/has recent (please select all that apply)	
Site is owned by a developer	
Site is under option to a developer	Х
Enquiries received/ strong interest	
Site is currently being marketed	
None	
Not Known	
Comments on market interest	
Wain Homes North West is the applicant for the current planning app which demonstrates that the site would be delivered quicklyif planning	
Utilities - Please tell us which of the following utilities are (please select all that apply)	re available to the site
Mains water supply	х

Mains sewerage	X
Electric supply	х
Gas supply	х
Public highway	X
Landline telephone/broadband internet	х
Public Transport	Х
Other (please specify)	
Utilities – comments	
No issues with utilities have been identified.	
Constraints - Please tell us which of the following constraithe site (please select all that apply)	nts are applicable to
Land in other ownership must be acquired to enable the site to	be developed
Restrictive covenants exist	
Current land use(s) need to be relocated	

Physical constraints (topography, trees, other)	Х			
Flood Risk				
Infrastructure required				
Public rights of way cross or adjoin the site	X			
Land contamination				
Access constraints				
Environmental constraints				
Please provide any relevant information of likely measures above constraints	to overcome the			
The public right of way will be retained within the layout.				
Some trees have to be removed to accommodate the delivery of the allocathere will be significant replanting to mitigate against any loss.	cated site however			
The applicant will consider any required planning obligations providing th and it is viable to do so.	ney are CIL compliant			
Timescales - Please indicate the approximate timescale for when the site will become available for development (please select one answer)				
Immediately	X			
Up to 5 years				
5 - 10 years				

10 – 15 years					
Beyond 15 years					
Unknown					
Timescales comments – particularly if you have indicated the immediately available, please explain why	nat the site is not				
The applicant can make an immediate start on site following the grant of pand discharge of pre-commencement conditions and it is estimated that the completed within 4 years.					
Other Relevant Information – Please use the space below for additional information					
N/a					

Question 9

Do you have any site suggestions for Local Green Spaces?

If you would like to suggest several sites, please submit a separate form for each one.

N/a					
Please provi	de a site plan cl	early identi	fying the exa	act boundarie	es of the site.
N/a					
, .					
Location - Is	the site in reas	onably clos	e proximity	to the comm	unity it serves?
N/a					

Site location (including grid reference and postcode if known)

Local Significance - Is the site demonstrably special to a local community and holds a particular local significance, e.g. due to its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife?

N/a			
size / Scale - Is	the site local in char	acter and not an	extensive tract of land?
N/a			
	ase provide photogra	pns of the site th	at support your
omments.			
N/a			
Ν,α			

Question 10

Do you have any site suggestions for ecological improvements?

one.	a separate form for each
Site location (including grid reference and postcode	if known)
N/a	
Please provide a site plan clearly identifying the exa	ct boundaries of the site.
N/a	
Do you own the site? (please select one answer)	
Yes (full ownership)	
Yes (part ownership)	
No	
Please specify if you also own/control adjacent land	
N/a	

How can the site be accessed? Are there any restrictions that may preven access e.g. third party ownership?	it
N/a	
Please specify the current land use.	
N/a	
If the land is in any existing ecological schemes, please specify until when	n.
N/a	
Please provide any details of factors affecting the site (e.g. flooding issue topography, notable species possibly present on site etc.)	s,
N/a	

Question 11

Do you have any site suggestions for renewable energy?

If you would like to suggest several sites, please submit a separate form for each one.

N/a	
Please provide a site plan clearly identifying the exact	boundaries of the site.
N/a	
Please specify the proposed type and scale of energy (MW), Height to tip (m), Height to hub (m))	development (Capacity
N/a	
Do you own the site? (please select one answer)	
Yes (full ownership)	
Yes (part ownership)	

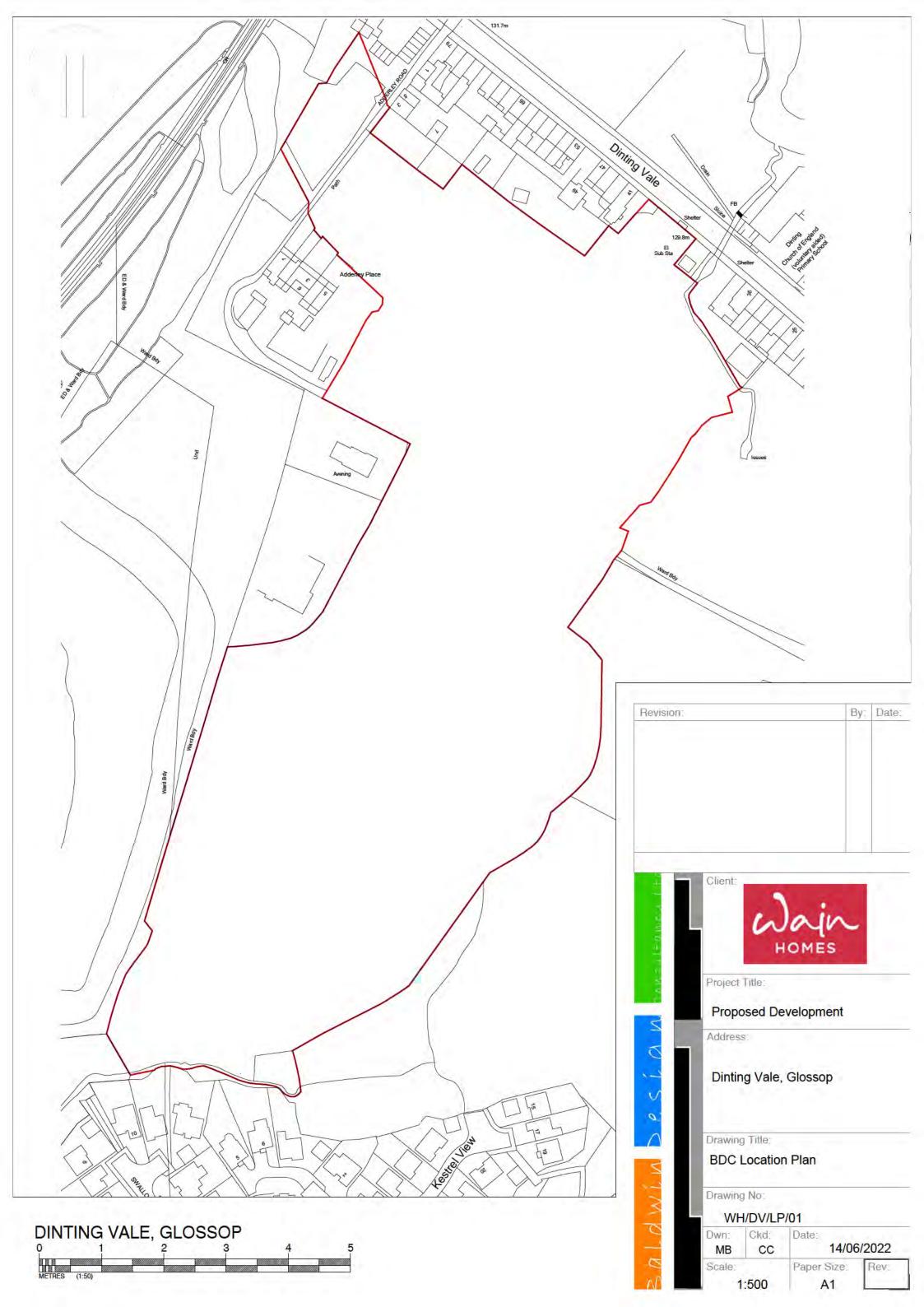
How can the site be accessed? Are there any restrictions that may prevent access e.g. third party ownership?
N/a
Please specify known designations (ecological / environmental / historical) on or around the proposed site
N/a
Current land use (including agricultural land quality rating if relevant)
N/a
Proposed grid connection point (if known)
N/a

Question 12

Do you have any site suggestions for other uses that you think should be included in the Local Plan?

What use is the site proposed for?	
N/a	
Site location (including grid reference and p	oostcode if known)
N/a	
Please provide a site plan clearly identifying	n the exact houndaries of the site
N/a	g the exact boundaries of the site.
Do you own the site?	
(please select one answer)	
Yes (full ownership)	
Yes (part ownership)	
No	

How can the site be accessed? Are there any restrictions that may prevent access e.g. third party ownership?
N/a
Please specify known designations (ecological / environmental / historical) on or around the proposed site
N/a
Current land use
Current land use
N/a
Signature
Niall Mellan
Date
02.03.2022
Thank you for completing this response form.





Comment

Consultee Mrs Lindsey Wakefield (1335075)

Email Address

Address

Event Name High Peak Local Plan - Early Engagen

Comment by Mrs Lindsey Wakefield (1335075)

Comment ID LPEA91

Response Date 03/03/23 16:29

Consultation Point Question 4 (View)

Status Submitted

Submission Type Web

Version 0.11

Question 1

Do you agree with the Council's initial view of the emerging issues identified Yes from the new evidence?

Question 2

Should the next Local Plan have a new Spatial Vision? Yes

Question 4

Are there any other policies in the Local Plan that you think should be yes updated?

Please specify which policy and how it should be updated.

See answer to Q5

Question 5

Are there any other new policies that you think the next Local Plan should Yes include?

Please specify what the new policy should seek to address and why.

Local Plan Consultation - Opportunities to protect and increase species of conservation concern, in partic Hedgehog (*Erinaceus europaeus*)

Whilst new Biodiversity Net Gain legislation will offer improved guarantees of habitat protection and creation, in orde of conservation concern it is necessary to include detailed policies in a local plan. The habits of swifts and hedgehogs r and provide opportunities for simple provisions that offer excellent rates of success in terms of conserving these sp

I am submitting details of two species of conservation concern that I monitor and help to protect in Buxton in my roll Biodiversity. Buxton's local Swift Group is part of the wider Derbyshire Swift Conservation Project, conducting survey and mapping nests. I collect and map hedgehog sightings, and assist and advise on hedgehog rescue and release

I recommend that the updated local plan includes new policies to protect and encourage swifts and hedge developments requiring both integrated nest bricks and hedgehog highways.

National Policy supports such conditions through various documents and statements.

Government Guidance - Natural Environment, updated in July 2019, states that:

'Relatively small features can often achieve important benefits for wildlife, such as incorporating 'Swift bricks' and safe routes for hedgehogs between different areas of habitat.'

National Planning Policy Framework 2019

- 170. Planning policies and decisions should contribute to and enhance the natural and local environment by:
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological netw future pressures;
- 174. To protect and enhance biodiversity and geodiversity, plans should:
- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including ti locally designated

sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by management, enhancement, restoration or creation, and

b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the **protecti** identify and pursue opportunities for securing measurable net gains for biodiversity.

The Natural Environment and Rural Communities Act2006 contains a statutory duty:

'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise conserving biodiversity'

Government press release – Brokenshire orders house builders to protect wildlife (July 2019)

- . Hedgehog highways recommended for new housing estates for the first time
- . Swifts and other wildlife to coexist with new homes
- . Rules recommend ways developers can identify new habitat for wildlife

Common Swift (Apus apus)

A long-distance migrant which returns to the UK in early May to breed and departs from mid July. UK population size

Current status

- . Protected by Wildlife and Countryside Act 1981
- . Added to UK BoCC Red List 2021 and classified as 'endangered' due to population decline of 60% between '

Ongoing volunteer survey work in Buxton recorded aerial groups of swifts in several locations, and in 2022 these a individual nests located across the town, estimated to represent 50-75% of the total number of nests in Buxton.

The located swift nests can be viewed on a map:

https://www.google.com/maps/d/u/0/viewer?mid=1Nz2nDsOuz4sxb9biTpYYxfEV0__2OEcj&hl=en_GB&ll=53.25457431

Swifts nest exclusively in buildings, and loss of nest sites is a major reason for population decline. Tradition eaves, which swifts can use to access small nesting spaces. Modern roofing methods, upgrades to buildings to impossifts since there are no gaps to allow access to nesting spaces. In Buxton, All existing nest sites are extremely vulne and roofing work including insulation and soffits. Whilst it is illegal under the Wildlife and Countryside Act to disturb ignored or not spotted, and no protection is given to nest sites outside of breeding season. Loss of nest sites and instance of the state of the st

A swift's typical lifespan is 9 years, breeding from 4 years old. Breeding swifts return to their previous nesting locati the site is inaccessible, sometimes even injuring themselves or dying in the pursuit of accessing the known nest sit to seek out nest sites in their pre-breeding seasons, and it is these birds which are most likely to use 'new' nest site be added to buildings to compensate for loss of traditional nest sites, but short term uptake can be poor.

Integrated 'universal nest bricks' are preferential to external boxes for several reasons:

- . long lasting, low maintenance and low cost (around £30 per unit)
- better temperature regulation, so can be sited on any aspect of a building
- . nests isolated from interior of building
- discrete since they are integrated into building
- . higher and quicker uptake by swifts
- used by other Red Listed bird species (house sparrow, starling and house martin)

Much detailed work has been done by UK group Swift Conservation to identify best practice, for example modifying r to existing nest sites.

https://www.swift-conservation.org

Several councils have already committed to swift conservation through the planning process. For example, Local Biodiversity Action Plan (LBAP) 2012 identified 20 species/species groups (from the UK BAP priority species cannot be addressed through habitat action plans alone, including swifts. To protect swift nest sites from building m their needs and ecology for householders and developers. In March 2020, BHCC passed planning rules that require of 3 swift bricks per dwelling, and new commercial developments must have one Swift brick per 50sq m of floor spa above 5m high, and is attached to all planning permissions.

Survey work in Buxton has identified the swift as a local species that requires improved conservation efforts. Other important populations. The updatedLocal Plan can provide protection and enhanced nesting opportunities for survey work in Buxton has identified the swift as a local species that requires improved conservation efforts. Other important populations. The updatedLocal Plan can provide protection and enhanced nesting opportunities for survey work in Buxton has identified the swift as a local species that requires improved conservation efforts.

places a condition on all new developments that they must include universal nest bricks, and by promoting best practice.

The recent developments in Harpur Hill unfortunately represent a huge missed opportunity in terms of swift conser swifts nests at Rock Bank above Grinlow Road, within sight of several hundred new houses. Inclusion of universal significantly increased the nesting opportunities for swifts and other Red Listed bird species.

Hedgehog (Erinaceus europaeus)

Current status

- Species of Principle Importance in England, Natural Environment and Rural Communities Act 2006, section 4
- . Protected under Schedule 6, Wildlife and Countryside Act 1981
- . Added to IUCN Red List as vulnerable to extinction in Great Britain, 2020

Decline

- . Population estimated at 30 million in 1950, now estimated at 879,000 by People's Trust for Endangered Speci
- . State of Britain's Hedgehogs 2022 reports 30-75% decline since 2000 in areas of countryside
- . Wildlife charities report recent stabilisation of urban populations

Volunteer survey work in Buxton and Whaley Bridge has recorded hedgehogs widely distributed across both areas Lightwood Road in Buxton, and Buxton Road in Whaley Bridge). There are regular reports of hedgehogs requiring assumed that Hedgehogs are present in all settlements across the High Peak. The records that have been gathered s decisions, for example for Buxton, records have been mapped:

https://www.google.com/maps/d/u/0/viewer?mid=1fltPHmJRrUJhgp48t-51AW5IBTKwx3IM&ll=53.25586422008995

It is important to protect this vulnerable species through detailed conditions for new developments, in particular highways) between the gardens of new builds through the inclusion of 13 x 13cm holes or gaps in fence panels and to find sufficient food and a mate, hedgehogs can roam up to 3km in a single night, and territories are typically 10-20 h to support this species.

Ecologist Hugh Warwick's petition 'Help save Britain's hedgehogs with hedgehog highways' has gained 1.1 million supported the measure through statements, there is no formal commitment to update planning policy. Some developate committed to include hedgehog highways in all new builds, but many developers do not make this commitmer surveys for hedgehogs are not required. LPAs can require surveys when hedgehogs are considered a local conservecommends that hedgehog highways are included in new developments, but this is not currently a condition of plane enacted.

Biodiversity Net Gain metric will encourage the planting of native hedgerows across new developments, and therefore Provision of log piles creates safe resting and breeding areas. It is important that ongoing maintenance of hedgerow by carefully monitoring the use of machinery such as strimmers, and avoiding disturbance and chemical inputs.

An updated Local Plan provides an opportunity to protect and encourage Hedgehogs across the High Peak highways must be included in all new developments, ensuring that new builds and the land around them provide to highlight the importance of this species locally. Hedgehog surveys and the application of ongoing survey work by requirement for all developments to ensure that existing habitat is protected, and integrated through green spaces,

I would welcome the opportunity to discuss this further, and can be contacted on 07807 220995 or by email thehay

Question 7 & 8

If you would like to suggest several sites, please submit a separate form for each one.

What is your interest in the site? (please tick all that apply)

Proposed Future Uses & Potential Site Capacity (please specify)

Market interest - please choose the most appropriate category below and indicate what level of market interest there is/has recently been in the site.

Utilities - Please tell us which of the following utilities are available to the site (please tick all that apply)

Constraints - Please tell us which of the following constraints are applicable to the site (please tick all that apply)



HIGH PEAK LOCAL PLAN EARLY ENGAGEMENT RESPONSE FORM

Responses invited from 19th January 2023 to 5pm on 3rd March 2023

The Local Plan sets out detailed policies and specific proposals for the development and use of land in High Peak (outside of the Peak District National Park). Your feedback will help the Council to identify the issues and options for the Local Plan for consultation later in 2023.

Your Contact Details:

	Personal details	Agent's details (if applicable)
Title	Mr	Mr
Name	Jim Wardle	Ralph Taylor
Job title (if applicable)	N/A	Associate Director
Organisation (if applicable)	N/A	Paul Butler Associates
Address		
Post code		
Telephone no.	C/o agent	
Email address	C/o agent	

PLEASE NOTE that responses must be attributable to named individuals or organisations. They will be held by the Council and will be available to view publicly and cannot be treated as confidential. Your contact details will not be published, but your name and organisation (if relevant) will. High Peak Borough Council maintains a database of consultees who wish to be kept informed about the Local Plan. Details of our data protection and Privacy Notice can be found on the council's website at: https://www.highpeak.gov.uk/YourData

Please complete and return this form by **5pm** on **3rd March 2023**

by email to: ldf@highpeak.gov.uk; or

by post to: Planning Policy, High Peak Borough Council, Town Hall, Buxton,

Derbyshire, SK17 6EL

Alternatively, you can respond online on the Local Plan consultation website https://highpeak-consult.objective.co.uk/kse.

Question 1 Do you agree with the Council's initial view of the emerging issues identified from the new evidence? (please select one answer) Yes No If not, why? **Question 2** Should the next Local Plan have a new Spatial Vision? (please select one answer) Yes No If so, what should it say? N/A

Question 3 What should be the Strategic Objectives for the next Local Plan?

The Local Plan should ensure sufficient land is identified for care home provision. The subject site is submitted to help meet this need.
Question 4
Are there any other policies in the Local Plan that you think should be updated? (please select one answer)
Yes
No

Please specify which policy and how it should be updated.

home deve	g Allocations – This policy should be updated to allocate the subject site for care elopment (see site specific nomination below). Alternatively a new policy relating to provision could be added.
nclude?	any other new policies that you think the next Local Plan should
piease se	lect one answer)
Yes	
Vo	
Please sp	ecify what the new policy should seek to address and why.

Question 6

What other evidence should the Council consider to inform the next Local Plan?

N/A		
Question 7 & 8		
Do you have any site suggest	tions for housing and / or	employment?
If you would like to suggest sevone.	eral sites, please submit a	separate form for each
What is your interest in the si (please select all that apply)	ite?	
Owner of the site		
Parish / Town Council		
Local resident		
Amenity / Community Group		
Planning Consultant		

Land Agent	
Developer	
Other	
Other (please specify)	
Are you the sole or part owner of the (please select one answer)	e site?
,	
Sole Owner	
Part Owner	
Neither	
If you are not the landowner or the s the name, address and contact detai provided	ite is in multiple ownership, please submi Is of the land owner(s) in the space
If not the landowner, I confirm that the site submission (please select one answer)	ne landowner/s have been informed of this
Yes	

No	
Does the owner(s) support the development of the site? (please select one answer)	
Yes	
No	
Site location (including grid reference and postcode if known)	
Land to the north of Millbrook House, Tintwistle, Derbyshire, SK14 8LA	
401058 396904	
Site Area (hectares)	
1.8	
Current Land Use(s) e.g. agriculture, employment, unused/vacant etc.	
Unused, vacant land	
Type of site e.g. greenfield, previously developed land/brownfield	
Unknown	

Please provide a site	plan clearl	y identifying t	the exact	boundaries	of the site
-----------------------	-------------	-----------------	-----------	------------	-------------

Submitted	
Proposed Future Uses & Potential Site Capacity (please (please select all that apply)	e specify)
Housing – Care home	
Employment	
Mixed-use (please specify uses)	
Self-build & custom-build housing	
Basic Capacity Information – area/number of dwellings/units/proposed floorspace	number of
The site is nominated for a care home use.	
Market interest - please choose the most appropriate called indicate what level of market interest there is/has recent (please select all that apply)	O J
Site is owned by a developer	
Site is under option to a developer	
Enquiries received/ strong interest	
Site is currently being marketed	

None	
Not Known	
Comments on market interest	
Utilities - Please tell us which of the following utilities (please select all that apply)	are available to the site
Mains water supply	
Mains sewerage	
Electric supply	
Gas supply	
Public highway	
Landline telephone/broadband internet	
Public Transport	
Other (please specify)	

Utilities – comments

Environmental constraints

The Coach House, Millbrook House is owned by Mr Wardle. It is already connected utilities with existing access provided from Manchester Road.	I to the above
There is an area of floodrisk identified immediately adjacent to Hollingworth Brook the west boundary of the nominated land, however the suggested development waway from this area to avoid flood risk.	
Constraints - Please tell us which of the following constraints are the site (please select all that apply)	applicable to
Land in other ownership must be acquired to enable the site to be deve	eloped
Restrictive covenants exist	
Current land use(s) need to be relocated	
Physical constraints (topography, trees, other)	
Flood Risk	
Infrastructure required	
Public rights of way cross or adjoin the site	
Land contamination	
Access constraints	

Please provide any relevant information of likely measures to overcome the above constraints

Part of the site is occupied by tree cover. sufficient for the expansion of the existing	The area that is not occupied by trees would be g carehome at Millbrook House.
Timescales - Please indicate the ap become available for development (please select one answer)	oproximate timescale for when the site will
Immediately	
Up to 5 years	
5 - 10 years	
10 – 15 years	
Beyond 15 years	
Unknown	

Timescales comments – particularly if you have indicated that the site is not immediately available, please explain why

The land is nominated for development as a carehome. The land is owned by Mr Wardle, who owns an existing carehome at The Coach House, Millbrook House. Mr Wardle has previous development experience and the site is available for an expanded carehome development immediately.

The existing carehome at the site is managed by Enabling Futures and provides residential care to young people with learning and physical learning disabilities. The carehome is recognised as outstanding following every OFSTED review to date. The land would allow for the expansion of the carehome facility to help meet demand in High Peak and the local area. The nomination land is considered suitable for the proposed use for the following reasons:

- A carehome use in this location is already established at The Coach House. As well as
 increasing the number of residents that will benefit from the care provided at the facility,
 expanding carehome provision in this location would also offer operational benefits
 through all residents and staff being based at a single site.
- Additional employment would be created at the expanded carehome facility with a range of roles at different skill levels provided for local people.
- The land is close to existing settlements including Hadfield, Glossop, Hollingworth and Hattersley which are within a 5km radius of the site. Its location is therefore accessible and sustainable, both for visiting family members and staff. The proximity to existing settlements means journeys can take place on foot and by bike, bus and train, reducing the need for visitors to travel by car. There is a bus stop on Manchester Road immediately adjacent to the site which is serviced by the No. 237 which runs regularly between Glossop and Ashton-under-Lyne. The nearest train station, approximately 25 minutes walk away, is Hadfield which is on the Manchester-Glossop line.
- Despite its sustainable and accessible location, the site also enjoys a degree of exclusion
 which makes it an ideal location for a carehome. The unique countryside environment
 means future residents can undertake outdoor experiences which enhance their
 wellbeing and quality of life, as is currently the case at the existing care facility based at
 The Coach House.
- As noted previously there are self-seeded trees occupying part of the land, although
 there is a significant area not occupied by trees which could accommodate a new
 carehome building as part of the expansion of the Enabling Futures operation. Additional
 trees could be planted as part of a new carehome development to enable it to
 successfully integrate with the surrounding landscape.
- Utilities to a new carehome on the nominated land could be achieved by taking existing services which currently supply The Coach House at Millbrook House.
- Whilst some of the nominated land is identified as being at flood risk (less than 5%), the majority of the land is within flood risk zone 1, which is the lowest level of flood risk.

Other Relevant Information – Please use the space below for additional information
Question 9
Do you have any site suggestions for Local Green Spaces?
If you would like to suggest several sites, please submit a separate form for each one.
Site location (including grid reference and postcode if known)
N/A
Please provide a site plan clearly identifying the exact boundaries of the site.
N/A

N/A					
₋ocal Signii	icance - Is the	site demonst	rably special	to a local con	nmunity and
nolds a part significance	icance - Is the icular local sig , recreational its wildlife?	gnificance, e.ç	g. due to its be	eauty, historic	
nolds a part significance	icular local siç , recreational	gnificance, e.ç	g. due to its be	eauty, historic	
nolds a part significance ichness of	icular local siç , recreational	gnificance, e.ç	g. due to its be	eauty, historic	
nolds a part significance ichness of	icular local siç , recreational	gnificance, e.ç	g. due to its be	eauty, historic	

Location - Is the site in reasonably close proximity to the community it serves?

If possible, please provide photographs of the site that support your comments.
comments.
Γ
N/A
Question 10
Do you have any site suggestions for ecological improvements?
If you would like to suggest several sites, please submit a separate form for ea
one.
Site location (including grid reference and postcode if known)
N/A

N/A					
Oo you own the please select or					_
es (full owners)	hip)				
es (part owner	ship)				7
No					_
Please specify	if you also o	own/contro	l adjacent lar	ıd.	_
N/A					
low can the sit			ere any restr	ictions that n	nay prevent
			ere any restr	ictions that n	nay prevent
eccess e.g. thir			ere any restr	ictions that n	nay prevent
iccess e.g. thir			ere any restr	ictions that n	nay prevent
ccess e.g. thir			ere any restr	ictions that n	nay prevent
iccess e.g. thir	d party own	ership?	ere any restr	ictions that n	nay prevent

f the land is in any existing ecological schemes, please specify until when.
N/A
Please provide any details of factors affecting the site (e.g. flooding issues, copography, notable species possibly present on site etc.)
N/A
Question 11 Do you have any site suggestions for renewable energy?
f you would like to suggest several sites, please submit a separate form for each one.
Site location (including grid reference and postcode if known)
N/A

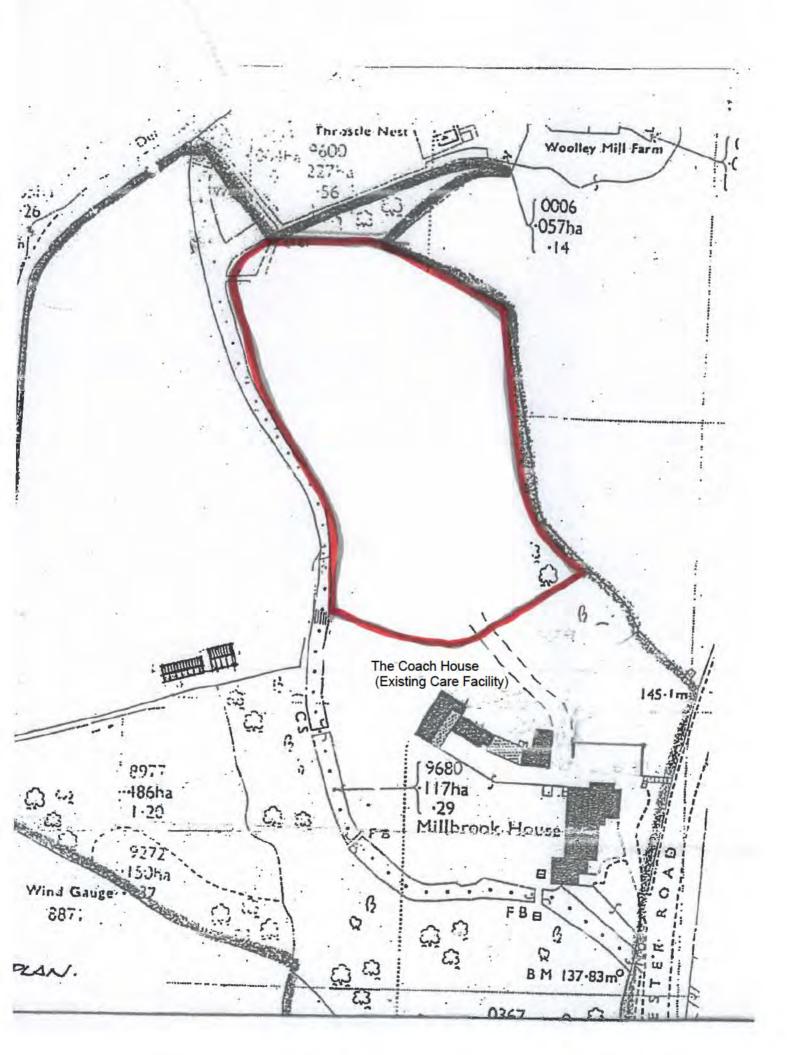
Please provide a site plan clearly identifying	the exact boundaries of the site.
N/A	
Please specify the proposed type and scale (MW), Height to tip (m), Height to hub (m))	of energy development (Capacity
N/A	
Do you own the site? (please select one answer)	
Yes (full ownership)	
Yes (part ownership)	
No	
How can the site be accessed? Are there an access e.g. third party ownership?	y restrictions that may prevent
N/A	

Please specify known designations (ecological / environmental / historical) on or around the proposed site
N/A
Current land use (including agricultural land quality rating if relevant)
N/A
Proposed grid connection point (if known)
N/A
Question 12
Do you have any site suggestions for other uses that you think should be included in the Local Plan?
What use is the site proposed for?
N/A

Site location (including grid reference and postcode if known)

N/A	
Please provide a site plan clearly ident	ifying the exact boundaries of the site.
N/A	
Do you own the site?	
(please select one answer)	
Yes (full ownership)	
Yes (part ownership)	
No	
How can the site be accessed? Are the access e.g. third party ownership?	ere any restrictions that may prevent
N/A	

Please specify known designations (ecological / environmental / historical) on or around the proposed site	
N/A	
Current land use	
N/A	
Signature	
Date 03.03.2023	
Thank you for completing this response form.	



Please find attached the submission from Warm Homes Glossop.

Warm Homes Glossop (formerly Warm Homes Whitfield) has been established with the aim of lobbying Government to invest in a major programme of insulation and retrofitting, which would bring down energy bills, keep homes warmer and reduce our carbon emissions.

The group also seeks to provide practical support for people in cold homes including "outreach" to occupiers of privately owned and rented housing, as well as public housing. We want to help people stay warm and healthy in their homes. This includes providing basic advice on appropriate home insulation, signposting to funding sources and other agencies and, where possible, direct assistance.

The group is supported by High Peak New Green Deal (which is a Friends of the Earth group) and we hope to support High Peak Borough Council in this work.

Question 1

Do you agree with the Council's initial view of the emerging issues identified from the new evidence? If not, why?

YES.

Question 2

Should the next Local Plan have a new Spatial Vision? If so, what should it say?

NO

Ouestion 3

What should be the Strategic Objectives for the next Local Plan?

ADD COMMENT

Ouestion 4

Are there any other policies in the Local Plan that you think should be updated? Please specify which policy and how it should be updated.

ADD COMMENT

Ouestion 5

Are there any other new policies that you think the next Local Plan should include? Please specify what the policy should seek to address and why.

Current policy: Local authorities should seek to exceed minimum standards and deal with health standards in **public** housing stock, and deliver transformative change via wide ranging internal retrofit programme(s).

Proposal: Local authorities should provide tangible support for initiatives to retrofit **private** housing stock in order to reduce carbon emissions and contribute to lower energy costs and improved health and comfort for residents.

Proposal: Local authorities should investigate opportunities to provide a 'One Stop Shop' that would provide advice and information to home-owners about all issues relating to retrofit. Retrofitting is a complex technical issue and problems can be caused if it is carried out incorrectly.

Question 6

What other evidence should the Council consider to inform the next Local Plan?

ADD COMMENT