

11th November 2015

Karen Taylor,
Case Planning Officer
High Peak Borough Council
Planning Department.

Peter Simon

48 Post Street
Padfield
SK13 1EF

Dear Karen

Addendum to my Objection of 9th November to HPK/2015/0412 Land at Dinting Road Glossop -

Since my Objection to this application dated 9th November appended below I have noted that the relevant Highways Authority for this application Derbyshire County Council have no issue with the application in highway terms, so I feel I should consider their stated position as well as that of the Applicant.

Firstly I note that while there are 2 names on their document (Mike Ashworth and Paul Froggatt) and for some reason it is in duplicate, there is no signatory on either part which might lead one to question who has authored it, and whether it is actually a legal document of authority? The County Council - in this co-authored/anonymous report - apart from making certain specific technical requirements regarding access arrangements and the site itself, may be read as simply saying that they agree with the **conclusion** of the Applicants Transport Statement for reasons that cannot be ascertained.

To paraphrase a rather long winded sentence they believe "*that the development would not have a significant adverse effect on capacity or safety of the local road network.*" This belief leads importantly to them saying this is not a case where "*development should be prevented or refused on transport grounds where residual cumulative impacts of development are severe.*" (NPPF, paragraph 32). This is favourable to the applicant, especially as the Local Council, not itself a transport authority, tends to rely heavily on Derbyshire's input for such aspects of planning decisions thereby expecting to escape accountability.

However it should be noted that Derbyshire rely on no transport database evidence whatsoever. They are at pains (Paragraph 2) to be completely neutral regarding the Applicant's database, they state that they know of no other database that contradicts it, and they do not feel a need to request a new database. So they must simply have made their mind up beforehand, but how they have done this is impossible to say? The position of this Statutory Consultee on this development as it relates to the matter of future public safety and road capacity seems to be that their Authority allows them to semi-anonymously issue a definitive opinion in the complete absence of any supporting reasoning or evidence.

Naturally I think it is obvious that this is completely unsatisfactory when they have been asked to comment as a statutory authority on a major residential development, and I think their opinion must either be completely discounted, or that they should be asked by the LPA to expand on the grounds on which they rely with regard to data, as well as making clear who is the author of the document?!

In the meantime ,unless and until Derbyshire Highways choose to expand on how they have reached their opinion, I continue to refer to the Transport Statement as the only meaningful transport evidence before those hearing and considering this Application. My case regarding this continues to be therefore as I have already submitted **below** : -*"Despite the Application being for a site with draft Local Plan status closer scrutiny at the Planning Stage reveals a flawed case for the transport aspects of the development and the Application should be refused with planning permission withheld"*-.

(continues to my first submission)

9TH November 2015

Karen Taylor,
Case Planning Officer
High Peak Borough Council
Planning Department. `

Peter Simon

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SK13 1EF

Dear Madam,

Objection to HPK/2015/0412 Land at Dinting Road Glossop -

Outline Planning Permission with all matters reserved (except access) for Residential Development of up to 65 Houses, together with Associated Access on Land to the South of Dinting Road

I appreciate that due to land supply and housing quota issues there is an in principle support for all development of sites allocated in the draft Local Plan such as this one. However the application stage should not be a rubber stamping process, but rather enable closer scrutiny of material planning issues, a point that is effectively acknowledged in the closing paragraph by Hilary Senior of Policy . I feel there is at outset an obvious concern about the existing and future capacity of the highway to deal with traffic generated by this proposed development so my objection seeks closer scrutiny of the position laid out in the Applicant's Transport Statement by Transport Planning (York) Ltd.

The Statement does not account for "committed developments" in the area and an oversight in this respect must lead to miscalculations regarding the impacts as regards congestion, air quality, safety, and sustainable transport. The report by the consultants states at 6.6 :

"As far as can be ascertained, other than the application site, there are no major "committed" developments in the area that would materially increase traffic flows on

***Dinting Road.** Therefore the 2020 growthed morning and evening peak hour traffic flows are also the corresponding 2020 “Base” (ie without development) traffic flows. “*

However there **are** in fact “committed developments” in the area with time restrictions to ensure they will have commenced by 2020 and should effectively be complete by around by that time. These developments are:

- Loxley’s Consent obtained at Appeal 2014 for circa 100 homes at Dinting Road Shawfields facing Dinting Road about ½ mile to the West and
- The Consent obtained by Gladman at Appeal 2014 to be fulfilled by Taylor Wimpey for circa 150 homes at North Road,

and in view of the location it would be implausible to argue that considerable traffic deriving from both of these schemes by 2020 would not naturally be making significant use of Dinting Road and the related highway network.

Therefore the consultant’s submitted projections regarding an acceptable traffic flow situation on Dinting Road in 2020 look to have omitted important evidence required to properly assess the application in this respect. This concern also applies to another key planning consideration, the consultant’s assertion of an acceptable access onto Dinting Road which may be unfounded for the same reason.

Furthermore I understand there is an outstanding application to obtain housing development on the current Dinting station ad hoc “free” car park/impromptu “park and ride” and were this application to carry either now and or in the relatively near future this would inevitably cause the station users to default back to on-street parking. This would cause serious obstruction further down Dinting Road which should also be borne in mind. However I do accept that in respect of land adjacent to Dinting Station while such a development would clearly have implications it is simply at application stage; is **not committed**, and also has a history of refusals!

Returning to the whole transport assessment case I suspect omissions of importance evidence for traffic projections are always possible where Transport Consultants are based in another part of the country and have not become or made themselves aware of local Appeal history. They have perhaps relied on the Local Plan site allocation to identify “committed developments”, which of course does not tell the full story allowing a serious underestimate of future traffic flows here.

Beyond the question of dubious future projections I do not feel the Consultants from outset take into account the existing constraints offered for traffic increase on the immediate relevant highway or the related network. Dinting Road could be described as having a country lane character, being narrow and poorly lit, with limited scope for improvement to a proper highway standard for busy traffic. Significantly speed calming measures are already in place at the western end close to the proposed site access, a recognition of the hazards the road offers here, once more a matter which I doubt the consultants have properly accounted for. Therefore the impact of new traffic and access are especially important considerations here, and there should not be uncertainty about the relevant part of the Consultant’s report and projections.

Moving to another aspect of the transport report (Sections 2, 4 and 10 and 4 particularly apply) it is claimed that the development applied for would be in compliance with NPPF and other guidance in promoting alternative modes of travel than the private car. In respect of Dinting Station, and critically in view of the congested trunk roads outside Glossop - travel to and from Manchester - I am not sure this is true.

General

4.1

As set out in Section 2 of this Transport Statement, national transport policies through the NPPF place significant emphasis for new development proposals to promote alternative modes of travel other than the private car (e.g. walking, cycling and public transport).

Walking is an important means of travel to Dinting Station, as a full assessment study would reveal. Foot travellers to and from the station will be observed at all travel times, especially at peak hours. As things stand they already have to make a crossing about ¼ mile from the station, where the pavement switches from one side to the other. The pavement crossing coincides with a bend in the road reducing visibility for motorist and pedestrian, so this is an area of concern already, especially in that at this point vehicles will be up to optimum speed with no calming humps present here. Clearly even were the Consultants traffic projections safe, which is under question, I suggest they have failed to see the negative impact on “alternative modes of transport”, as an increase of traffic will act as an obvious deterrant to the pedestrian route to the station should it become more dangerous. Simply on the back of this development alone therefore there is a situation here of non-compliance with national planning policy transport planning guidance as cited and the unaccounted traffic from committed developments worsens the position still further. This should count seriously against this application.

In summary therefore the transport statement's inaccuracy as to evidence and other shortcomings raises serious doubts as to the capacity of the local highway and transport systems to safely and sustainably absorb the traffic the development will generate. Despite the Application being for a site with draft Local Plan status closer scrutiny at the Planning Stage reveals a flawed case for the transport aspects of the development and the Application should be refused with planning permission withheld.

Yours sincerely

Peter Simon