

From: planningcomments@highpeak.gov.uk  
Sent: 10 July 2015 10:10  
To: Planning Comments  
Subject: Comment Received from Public Access

Application Reference No. : HPK/2015/0058  
Site Address: Land Off Long Lane Chapel-en-le-Frith Derbyshire  
Comments by: David Brindley  
From:

Phone:  
Email:  
Submission: Objection

Comments: I note that the planning application has now been revised based on two access options to the proposed development. I believe that both of these are unsuitable and therefore object to the application.

#### Option 1 (access to development at current school entrance)

The 6C's design guide states that for a road serving a school, the carriageway should be 6.75m wide in all cases.

The current access to the high school is via Long Lane between the Manchester Road Junction and the railway bridge that crosses the road. The width of the carriageway is less than 6m and falls significantly short of the 6C's design requirement. The current access route to the school is therefore substandard.

Option 1 will significantly alter the access arrangements to the school and increase traffic. The developer has failed to address the substandard access from the school onto Long lane and his application should therefore be refused, as it does not comply with the 6C's design guide.

#### High School Growth and Traffic Impact

In response to the application, Derbyshire District Council (in a letter dated the 17th March 2015) stated that 'Future projections therefore show that Chapel-en-le-frith High School would not have sufficient capacity within the next five years to accommodate the additional pupils arising from this development'.

It can therefore only be concluded that the high school will require expansion and in accordance with the 6C's design guide 'Where a proposed development requires the expansion of an existing school, that is the construction of one or more new classrooms, the traffic impacts of the expansion must be considered early on and as part of any transport assessment required for the development. Measures will normally be required to provide 'safe routes to school' and minimise the risk of causing or making worse on-street parking problems.'

The traffic impacts on the school have not been considered in the applicant's traffic assessment and are certainly not being considered 'early on', as the applicant is attempting to make the access to the development a reserved matter. I request that the application be rejected until the applicant provides the necessary data to comply with the 6C's design guide with respect to a traffic assessment that covers the impacts on the school.

## Changes to School Traffic Management

The applicant's access proposals will have a significant impact on the access / egress arrangements of the high school and most notably the applicant is proposing that the one way traffic route around the school be reversed. The applicant has provided an indicative layout for the school access arrangements in drawing 'SCP/14281/F06'. It is clear (to me at least) that the applicant has attempted to show how he can increase the school parking, but sadly this appears to be at the expense of pupil safety. The proposals result in pupils alighting buses into the roadway, it requires buses to blindly reverse towards the school building entrance / exit and requires pupils to cross multiple roads to exit the school site. I believe that any risk assessment would condemn the proposed scheme as unsafe compared to current existing arrangements. If planning was granted, then I believe that to make the scheme safe would require a loss in parking (resulting in additional on street parking contrary to the 6C's) or a loss of part of the school playing fields. The access to the site should not be considered as a reserved matter and the application should be rejected until the applicant provides details of the development access route and the proposed changes to the school access / egress so that a detailed analysis can be undertaken on the safety of his proposals.

It should be noted by the planning authority that the Health and Safety Executive (HSE) states that 'Schools need to assess the risk from vehicle movements on their premises and manage those risks in line with current workplace transport guidance e.g. segregation, marking and lighting. Schools should consider in their risk assessment vehicle movements occurring immediately outside the school premises which may be associated with school activities, such as staff arriving and leaving work, school buses delivering pupils, delivery vehicles.'. With regard to reversing vehicles the HSE guidance states 'Remove the need for reversing altogether, by setting up one-way systems, for example drive-through loading and unloading positions. Where reversing is unavoidable, routes should be organised to minimise the need for reversing.'.

Please can the planning authority ensure that the high school / Local Education Authority (Derbyshire District Council) have been consulted over the proposed changes in school access / egress and that the appropriate risk assessments have been conducted that demonstrate the acceptability of the developers changes to the school access (for all stages of the development). Without this data / assurance, I find it difficult to believe that access option 1 can currently be given any serious credibility and therefore request that planning be refused.