I herewith lodge objection to the outline planning application as detailed below.

Application details

Reference number:

HPK/2016/0059.

Site location:

Lesser Lane, Fairfield, Buxton, Derbyshire, SK17 7JL

My details

Name:

Kathryn Freeman Townend Farm, 47

House name/number:

Waterswallows Road

Street name: Village/area:

Fairfield

Town:

Buxton

County:

Derbyshire

Postcode:

SK17 7JJ

E-mail:

Nature of submission

To inform the Authority that I **object** to the Planning Application.

Summary objection:

Summary of material planning considerations:

- The proposed development is within the H4 area designated as Dale Lane, however this allocated land is subject to access via the proposed new link road. There is no justification to approve any part of the H4b area if it is not accessed via the link road certainly not where alternative access is proposed via what the Local Highways Authority classifies as a 'substandard' junction;
- The interactive planning map shows the land for proposed development to be within the Local Saved Plan H4b area allocated for development.

 However the aerial view of the interactive map shows clearly that the access to the land proposed for development is not within Hb4. The application

refers to the 'area adjacent to the field gate giving access off Lesser Lane' being referred to as 'negligible'. Since the Saved Plan has not been superseded, this is, as the application itself states, a 'material consideration'

- Indeed, exclusion of this land within Hb4 may well have been a deliberate decision on the part of Council planners previously to prevent further development further to the west of H4b;
- The application argues in favour of approval on the basis of historical planning approvals for which it can find no record (Dakin Court/Waterswallows Mews), whereas the High Peak Borough Council website expressly states that "Each planning application is decided on its own merits, in the light of all material considerations"
- The area is an Environment Agency risk area of flooding from groundwater.

Detailed objections:

Section of the	Wording of the application	Objection
application		
1.11	In brief, the unadopted Lesser Lane section of stone track will be improved/surfaced to allow safer and more convenient access to the site and the neighbouring properties which use it for access.	The additional volume of traffic will make access less safe/convenient for the neighbouring properties. Surfacing the current track will not address the issue that a public footpath exits directly onto the current track (proposed surfaced track). It does not address the possibility that traffic will move faster on a surfaced road than on a stone track and thus be more of a hazard. Neither does the argument of safety and convenience to the neighbouring properties address the issue that there will inevitably be a, potentially considerable, increase in vehicular movements. As this is defined as a 'small enclave' (section 1.6 of the outline planning application), this could mark a significant percentage increase.
		No provision is made in the outline planning application for a pavement, thus there is no pedestrian refuge at the site access, which opens directly onto open countryside popular with walkers.
2.1	The High Peak Borough	The High Peak Local Plan Preferred Options Map 50 B8 shows land to the west of Tongue Lane, Fairfield,

	Council's interactive planning map shows the site to be within the Buxton built up areaNo other planning constraints are identified on the interactive map.	Buxton (Policy H3 and DS13) as for development. This preferred option does not include the access to the land to which application HPK/2016/0059 refers. The aerial view of the interactive map clearly shows this proposed development to be part of the Dale Lane proposed development, and shows that the boundary to the land subject to this planning application falls outside of this development. Section 7.22 of the HPBC Saved Local Plan Policies allocates a total of 4 hectares of land which it sees as "a logical extension to the Tongue Lane Industrial Estate. Further industrial development in the Fairfield area, including this allocation, is closely tied with the proposed Fairfield Link Road. This road may provide the opportunity to release further land for development." Without the link road, development of this site cannot be justified, irrespective of the other planning issues it raises.
2.2	the latest document being the Local Plan Submission 2014	The proposed development would currently be accessed via Waterswallows Road/Lesser Lane, although the site itself falls within the area west of Tongue Lane. Policy DS 16 of the Local Plan Submission 2014 states in relation to Land west of Tongue Lane, Fairfield, Buxton that development will be subject to: "Developer contribution towards the provision of infrastructure, in particular, the new Fairfield Link road, public transport provision, commuted sum to Education Authority, and other community services and needs as required." Further, section 6.110 states that: "The Highways Authority considers that development of the site would cause an adverse impact on the surrounding highway network. The existing residential estate streets and the A6 already suffer from frequent congestion, and the Highways Authority does not consider it to be feasible to provide meaningful mitigating improvements to offset additional impact. Consequently, it considers that the

		provision of the Fairfield link road is essential."
		On this basis there are no grounds for the proposal to be approved unless the link road is approved first.
3.4(i)	the application site lies	The objection is to the 'area adjacent to the field gate giving access off Lesser Lane' being referred to as
	within the settlement	'negligible'. Since the Saved Plan has not been superseded, this is, as the application states, a 'material
	boundary for Buxton, as	consideration'
	identified by the Proposals	
	Map and Saved Policy GD2	While area Hb4 of the interactive map shows the application site to be within the settlement boundary,
	of the Adopted Local Plan	the <i>proposed access</i> to the proposed development is <i>not</i> within said settlement boundary. This may have
	2008 (with the possible	been a deliberate policy on the part of the Council to prevent development beyond the area H4.
	exception of a negligible	
	area adjacent to the field	
	gate giving access off	
	Lesser Lane – difficult to	
	determine on the	
	Proposals Map	
3.4(ii)	Policy H4 states that	Policy H4 does, indeed state that 'planning permission will be granted for residential development' but
	'planning permission will	this sentence is not completed in the outline planning application .
	be granted for residential	
	developmentIt is evident	Had the application completed this sentence it would read:
	from this that the council	Planning Permission will be granted for residential development at the following sites identified
	has a long held and	on the proposals map, subject to meeting the following requirements:
	continuing aspiration for	(a) Land at Brown Edge Road (1 ha)
	development on this land	The design and landscaping of the development shall have regard to the existing streetscene
		and adjacent countryside
		An element of affordable housing will be negotiated
		(b) Land off Dale Lane (1 ha).
		Access to the site will be via a new distributor road, which will be constructed from the A6 (T)
		at Fairfield Common to Dewpond land beyond the southern boundary of the site.
		Development will have regard to the character of the Conservation Area, the protection of
		preserved trees and the impact on the open countryside.
		Therefore the objection is that without the new distributor road, and since current access is outside of

	grasp the opportunity afforded by the current proposal.	to be met, planning is not about 'grasping the opportunity' - it is about delivering developments that comply with policies and plans designed to protect the character of the existing area and the sustainability and safety of the community, which this application fails to do on a number of points (see other objections below).
3.15	The LHA point to the junction of Lesser Lane and Waterswallows Road as being 'substandard', as if to enhance the case that the link road is the only solution that can be tolerated.	This reference to the substandard junction supports the argument that it cannot be tolerated as a solution. Section 7.22 of the High Peak Saved Local Plan Policies states in reference to the Dale Lane development, earmarked as land under which the current proposal falls: "Further industrial development in the Fairfield area, including this allocation, is closely tied with the proposed Fairfield Link Road. The new road is likely to be built in 2 sections initially. The north section will be constructed in association with new housing development in the Dale Lane and Ashwood Road area, and will serve the existing Industrial Estate."
3.15	In the first instance, it is difficult to imagine that the proposed small scale development of between 5 and 8 dwellings would generate the volumes and type of traffic that would encounter, or create, serious highway safety concerns at that junction. The additional traffic would be largely unnoticeable in the context of the enclave of some 20 dwellings	This is a subjective observation, without any evidence or statistical data showing current or anticipated vehicular movements and their impact. With no analysis of vehicle movements into and out of Lesser Lane, no meaningful comparison can be made and thus this 'argument' cannot be used to substantiate a planning application. Further, Appendix 1 - Draft Parking Standards of the High Peak Saved Local Plan Policies of the High Peak Local Plan - Additional Consultation document advises 1.5 parking spaces per one-bedroom dwelling (C3). If 8 one-bed dwellings are built, and the same vehicle use is assumed for the current enclave of 20 dwellings (20x 1.5) , this would mean a 40% increase in vehicles using the substandard Waterswallows Road/Lesser Lane junction. This is a conservative calculation as the houses are likely to be more than one bedroom. There could therefore be potential for a greater number of vehicles than there are parking spaces on the site, with the risk of additional on street parking. This could cause further hazards and impact regarding the ability of vehicles to pass each other, access for emergency vehicles and pedestrian safety.

		H4, OPP should not be granted.
3.9	Derbyshire County Council as Local Highway Authority (LHA) was consulted at the pre application stage. It suggested that LHA support was unlikely as only 5/6 dwellings would significantly intensify vehicular activity at the substandard junction of Lesser Lane with Waterswallows Road with difficulty in improving it.	LHA support is unlikely for only 5 or 6 dwellings yet the application is for 5 to 8 dwellings. The application thus seeks to <i>more than</i> significantly intensify vehicular activity at a <i>substandard</i> junction.
3.9	Reference was made to the desirability to serve this entire site from the proposed link road	The reference to the proposed link road is significant (see 2.2. and 3.4 (ii) above). Section 6.47 of the High Peak Saved Local Plan Policies states that "The proposed developments at Dale Lane and Hogshaw <i>rely</i> on access taken from Fairfield Common." The land subject to the application is part of the Dale Lane allocation for housing. However application HPK/2012/0097 for the link road, which was submitted on 23 February 2012, remains pending.
3.14	Whilst the LHA may prefer the link road to come forward to serve the H4b land, the reality is that this has not happened despite the Council's best effortsThe time has come to	The outline planning application therefore directly contradicts the LHA recommendation (see also section 3.9 of the application in which it is stated that the LHA considers the Waterswallows Road/Lesser Lane junction to be 'substandard' with 'difficulty in improving it.' Indeed, reference to this junction contradicts the claim in section 3.14 of the application that land is with "entirely independent vehicular access." The entire H4b development is dependent on the link road, yet the application consents that "nothing has emerged to suggest it will happen." Whilst it is appreciated that there are housing targets that need

		It should further be noted that application makes no reference to 'Person Trips' as defined by the Department for Transport Guidance on Transport Assessment, which considers all modes of transport. The application does not take into account traffic other than that of the "current enclave" which uses the substandard Waterswallows Road/Lesser Lane junction. This includes: heavy farm traffic to and from Home Farm and Townend Farm (which is classified as smallholding: PI 116223287); refuse vehicles; holiday traffic to Home Farm holiday lets; delivery vehicles; Post Office vehicles) and the need for emergency services vehicles to access the enclave. Furthermore, increasing the traffic at Lesser Lane and thus Waterswallows Road (the only exit entrance without the link road) would cause an adverse impact on the surrounding highway network. The existing residential estate streets and the A6 already suffer from frequent congestion. Waterswallows Road is also busier since the opening of the Buxton Water plant and the recycling facility.
3.16	the junction is positioned well within the 30mph zone	It is indeed. However, other objections/comments regarding this application have raised the fact that reality of the speeds on this road bears scant relation to the speed limit sign. Such is the problem that even prior to this outline planning application, community speed watch has been investigated as a possible deterrent to speeding motorists.
3.16	two vehicles can pass in the junction and along the metalled road	While there is 'technically' space for two vehicles at the junction, a car travelling from the east cannot enter Lesser Lane at the same time as another vehicle is waiting to exit. It is also a difficult manoeuvre if a vehicle is parked close to the top of Lesser Lane – which does happen frequently and will only increase if the number of vehicles increases by 40%.
3.16	exit visibility at the junction is very good in both directions, with wide unobstructed verges in both directions	Visibility is good in both directions on exiting Lesser Lane when the grass verge is not overgrown. This is only possible because historically the verge has been maintained on a voluntary basis by residents to improve safety. However on entering Lesser Lane (the application makes no reference to this) from the west, visibility is severely limited with respect to traffic travelling from east to west. A further safety concern is that to ensure good visibility, traffic travelling west-east needs to be very close to the white line, but traffic travelling east- often straddles this line at this bend in the road.
3.17	the merits of this junction HPK/2003/1042would	This is an irrelevant argument as it relates to an existing building and not to a new housing development. This application was considered on its own merit, as this application will be. Home Farm sets no

	have been in the knowledge that visitors to the holiday let would usually be wholly	precedent for any other (outline) planning application. Indeed, the High Peak Borough Council states website that: "Each planning application is decided on its own merits, in the light of all material considerations".
	unfamiliar with the locality,	However it should be considered that:
	but reasonably able to deal with the unction layout. The LHA and/or Council	Visitors to the area who are unfamiliar with the road layout are more likely to drive slowly and with caution in approaching the unfamiliar (substandard) junction.
	was evidently prepared to accept the situation.	The Home Farm holiday let sleeps a maximum of six people on a <i>temporary</i> basis. This cannot be compared with the number of people who would <i>permanently</i> occupy up to <i>eight</i> dwellings on the proposed site.
		The very wording that the "LHA and/or Council was evidently prepared to accept the situation" is in itself a recognition that there is a situation.
		Neither can it be conceivable that the LHA/Council makes its decisions on the basis of a maximum of six additional visitors to the Peak District.
		A junction considered by the LHA to be 'substandard' cannot be argued to have 'merits' in granting planning approval.
3.18	The former depot site has also been redeveloped to form the 5 dwellings	Reference to these 5 dwellings is in fact in line with the Council's stated preference to support development on previously developed land rather than on greenfield sites.
	known as Waterswallows	Section 6.7 of the High Peak Saved Local Plan Policies refers to Policy 40
	Mews. This development could not be identified in the Council's online	H1 – Principles Of Housing Provision and states that: "Planning Permission will be given for new housing, giving priority to the redevelopment of previously developed land."
	recordslocal knowledge suggests this was approved around 20 years agoit is	Since the development cannot be identified in the Council's online records, the only 'reasonable' point to 'assume' is that the planning decision, as judged on its own merits, was taken with regard the volume and speed of traffic at that time and cannot be used in favour of the current application.
	reasonable to assume that the planning balance acknowledged the	

	benefits	
3.19	The 7 dwellings at Dakin Court were also developed following approval sufficient to outweigh shortcomings in the junction layout.	As above
3.20	The use of the application site for horse grazing, with unrestricted rights to drive large horse boxes to and from the site, should also	Since the road to the application site continues to Home Farm working farm, the activity that is cited would not necessarily cease, unless the working farm is to be stopped from transporting animals. Section 3.28 of the application states that "use of the track by farm vehicles would need to be taken into
	be taken into account. This activity would of course cease should planning permission be granted for residential development on the land, removing some larger slow moving vehicles from using the junction.	account" which is in direct contradiction. It is true that the land is currently used for horse grazing. However currently the site accommodates only two horses, which the owners attend to daily but which they do not transport in horse boxes. Therefore, there is no evidence that there would be any change in larger and slow vehicles using the junction.
3.21	This stretch of Waterswallows Road, very close to Lesser Lane and within the 30mph zone, has numerous domestic drives opening directly	The stretch of road heading east from the Waterswallows Road/Lesser Lane junction that is within the 30mph zone has just 7 domestic drives (The Paddock, Stone Court, numbers 49, 51, 53, 55 and 57 Waterswallows Road. None of these is at an angle as is Lesser Lane, so they do not suffer the visibility issues of the substandard Waterswallows Road/Lesser Lane junction. Neither can a domestic drive serving a single property be compared with the traffic using the substandard
	onto it; the heavily used road to the golf club house nearby sits at an angle to the main road, with a public house and parked cars	junction. The road to the golf club house is cited as being at an angle to the main road. The parked cars 'right in the junction' cannot be seen as mitigation for this application, since they cause exactly the same hazard as do any cars parked in an equivalent position on Lesser Lane. Further, other than the angle to Waterswallows Road, this junction has no other commonality. It is far wider at the junction to Waterswallows Road than

	right in the junction, and another junction adjacent	is Lesser Lane and does not share the same visibility issue as it is situated on a completely straight stretch of Waterswallows Road. This road is also cited as being 'heavily used' but since it serves only a few dwellings and the golf club house, with no through road, it is far from heavily used, especially in the winter when the golf course is closed. The 'road adjacent' is at a straight angle to Waterswallows Road and is a one-way road allowing entrance from Waterswallows Road but no exit; it is also subject to a 20mph speed limit and thus addresses some of the safety concerns associated with the Waterswallows Road/Lesser Lane junction. Therefore any comparison or reference to this junction in mitigation of the planning application is irrelevant.
3.21	semi-rural location, all within the 30mph zone where vehicle speeds can be expected to be lower than open countryside.	As per 3.16 above, the mere presence of a 30mph zone sign does not reflect the reality of driver conduct on this road. This road has a vehicle weight restriction of 7.5 tonnes and so does not carry larger traffic that would naturally 'calm' the traffic. Neither does the road feature any traffic calming measures such as speed humps or different surface materials to indicate the reduction in speed from 60mph to 30mph. The application defines the location as semi-rural. The proposed increase in properties from the development and the fact they are new build on a greenfield site would significantly change the character in the 'enclave' (definition: a place or group that is different in character from those surrounding it).
3.22	In this context the Lesser Lane junction can be said to be technically probably one of the best on the road on any analysis of available road space, visibility, white lining, and lighting.	The only other junctions along the stretch of Road from the public house and golf club as referenced under 3.21 are the road to the golf club house and the 'adjacent road' is Ashwood Road which currently links directly to Dale Lane. In comparison, the Waterswallows Road/Lesser Lane junction shares only that it has white lining and lighting. In terms of camber, width of exit/entrance, visibility and traffic control (Ashwood Road being one-way), it is inferior.
3.24	It can be concluded from the local context that the Waterswallows Road	The application states in section 3.26 that "There is no other prospect of other land coming forward for development that would be served from Lesser Lane."

	/Lesser Lane junction has some merit in its layout and compares well to others nearby. The history of approvals for residential development along Lesser Lane indicate clearly that any shortcomings in the layout of the junction must have been judged to be quite limited.	This justification is irrelevant since the H4b area is <i>subject to access</i> from the proposed link road. Even if other land were to come forward, it would be subject to the same access objection. Re the reference to history, see the council website's statement that "Each planning application is decided on its own merits, in the light of all material considerations."
3.24	The history of approvals for residential development along Lesser Lane indicate clearly that any shortcomings in the layout of the junction must have been judged to be quite limited. The Council could have taken the view that any shortcomings were serious to warrant outright refusal, but it did not.	See point 3.17 above. The High Peak Borough Council states website that: "Each planning application is decided on its own merits, in the light of all material considerations." Any prior planning decisions were taken with regard the volume and speed of traffic 20+ years ago and cannot be used in favour of the current application.
3.25	Even if the LHA does not change its view, the Council will have the final say.	As above, history is not the basis for future planning decisions. Since the LHA has considered the junction to have "no prospect for improvement" it is difficult to imagine on what basis it might change its view.
3.28	The use of the track by	Section 3.20 of the application argues that the elimination of horse grazing will prevent "some larger and

	farm vehicles would need to be taken into account	slower vehicles from using the junction", yet here concedes that farm vehicles will continue to use the track.
3.31	The site frontage to Lesser Lane is sufficiently wide to accommodate vehicles passing side by side	The application does not specify how many vehicles can pass – for example, where will the new site place its refuse bins and how will refuse trucks access the site, especially if the site will operate on a single point of entry/exit to the developable land or a small 'green' island, which could be blocked by 24 different bins on green/brown collection days. There is also the potential of additional vehicles parking on the highway if there is insufficient parking on the development for the number of vehicles in use. This could restrict the ability of vehicles to pass and access for emergency vehicles.
3.2.4/3.2.5	It is worth noting that whilst T12, T13 and T15 are dropping their branches in almost a woodland setting, T1 and T5 are adjacent to the road which is becoming more used as more dwellings are built along it	The Arboricultural Officer Comments state that "(T1 to T5) will need to be removed to accommodate the access. These trees are prominent and at least 2 have potential for bat roosts" The Arboricultural Officer also states that: In any event I consider the majority of trees in the site to be sufficient merit to be included in the TPO and should be retained.
3.32	The trees stand close to Lesser Lane and removal of that risk is desirable.	Risk reduction does not necessarily mitigate removal of the trees. Trees can be managed in such a way as to redistribute their weight and can be pruned to control how the wind hits them (for example thinning out branches so that the tree does not act a 'sail').
3.36	The proposed tree removals will give sufficient space for either a single point of entry/exit to the developable land or a small 'green' island.	If there is only one-way entry to the developable site, depending on the number of cars this will mean traffic waiting in Lesser Lane to enter the site while other vehicles exit. This could be a serious nuisance to the properties at 1-3 Lesser Lane and in Waterswallows Mews. Additionally, if the residents of the new development become frustrated at the single point of entry/exit system, they could park on Lesser Lane to ensure their exit is not delayed. This will hinder traffic entering the substandard Waterswallows Road/Lesser Lane junction, particularly if emergency vehicles need to enter the enclave.
3.48 and 3.49	The site is within Flood Zone 1and thus flooding of the site from rivers can be regarded as 'very unlikely'.	The site itself is in Flood Zone 1 of the Environment Agency's 'Flood Map for Planning' with respect to risk of flooding from <i>rivers</i> . However this link from the same interactive map when set to the <i>groundwater flooding risk</i> view shows the site and Lesser Lane/Waterswallows Road to be in a <i>risk area</i> : http://watermaps.environment-

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		This has been confirmed in a telephone conversation with the Environment Agency (30 March 2016). Given historical flooding in Lesser Lane/Waterswallows Road, the application fails to take sufficient account of the wider impact of the proposed surface water draining solutions.
		This is also a concern given that the Aboricultural Officer Comments raise the issue of changes to drainage of the site if any of the trees are felled.
3.48	the fact that the site has been allocated for housing development under saved	Objection: Access to the site is outside of Local Plan Policy H4b.
	Local Plan Policy H4b indicates that the Council is satisfied regarding the flood vulnerability of the site.	While is the area is not at risk of flooding from rivers, it is at risk from flooding as the result of surface water. See above. There would be additional access/traffic issues in the event of flooding at Lesser Lane/Waterswallows Road, which already serves as a relief road if the A6 is blocked.

Further objections – relevant High Peak Saved Local Plan plans and policies:

Policy reference	Objection
Policy 3	The new development will be visible from Waterswallows Road, as is the current stabling. The current stabling is in line with what
GD4 – CHARACTER,	the application itself refers to as the area's semi-rural (3.21) nature, supported by the presence of a working farm and small
FORM AND DESIGN	holding.
Policy 4	-Loss of daylight for 1-3 Lesser Lane from passing traffic due to the positioning of their windows in relation to the street level.
GD5 - AMENITY	- Risk from hazardous substances (known Radon gas area)
	- Traffic safety and generation. Likely (minimum) 40% increase in traffic using what the LHA considers to be a substandard junction

Policy 9	This policy is not supported by the potential for a 40% increase in traffic at a substandard junction.				
OC1 - COUNTRYSIDE					
DEVELOPMENT	In addition, approval of this application is not in line with paragraph 3.4 in that it is not directly accessible to local bus routes (no safe waiting for bus 189/190 on the grass verge adjacent to the golf course. Fairfield Road (bus 199 via extremely narrow pavement at Dakin Cottage – therefore very limited disabled access).				
	Further, policy 44 H9 states that a criterion for affordable housing is "the proximity of local services and facilities and access to public transport".				
	The application is also not in line with; "Reusing buildings or land which has become derelict, disused or despoiled will also be preferable to erecting new buildings or using land which can continue to serve the needs of agriculture."				
Policy 12 OC4 - LANDSCAPE	-See the Environment Agency flood risk plan in surface water risk mode with respect to concerns regarding natural drainage (3.48 and 3.49 of the application)				
CHARACTER AND DESIGN	- the type and distribution of wildlife habitats is not fully addressed by the application. The Ecology Appraisal conducted by Ecus in December 2015 is season-specific and at odds with local sightings (in different seasons). As a minimum, a second ecological report in the spring/summer should be considered.				
Policy 23 BC8 - SETTINGS OF LISTED BUILDINGS	Dakin Court, the history of which is detailed in other objections, would be overshadowed by the development and affected by (street) lighting, noise and the landscape character of the proposed development.				
Policy 81 TR4 – TRAFFIC MANAGEMENT	Objection on the basis of 'material harming highway safety and local amenity'. There will be as a minimum a 40% increase in traffic using a substandard junction but the application therefore a traffic assessment study should be required.				
Policy 82 TR5 – ACCESS, PARKING AND DESIGN	Access and egress by pedestrians, cyclists, public transport users and the private car is not safe and cannot be justified to be at a substandard junction.				
	Planning permission being subject to "a high standard of design and layout having regard to the parking, access, manoeuvring, servicing and highway guidelines" is incompatible with the proposed access via Waterswallows Road/Lesser Lane				
Policy 85 TR11 - FOOTPATHS,	This policy specifies that planning permission will be granted if public safety and security will not be prejudiced. Under this application, there is a public footpath with egress opposite the proposed development, with no (proposed) pavements and in an				
BRIDLEWAYS AND	area popular with walkers and adjacent to open farmland.				

BYWAYS	
	Therefore public safety and security will be prejudiced.

ENDS

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