14th July 2022

HPK/2022/0259 – Application for the construction of 10 new houses on vacant land to the north east of Highstones, Bute Street, Glossop

We contend that this application should be refused due to the following material considerations:

Overdevelopment

Whilst the site is within the built-up area on the Local Plan and is not a designated "green space," it is not specifically zoned for housing. The Local Plan allocated 31 houses on the nearby Hawkshead Mill site (hek/2019/0311), and building there is almost complete. There is currently an application by the same developers to build six houses on land between the Hawkshead Mill site and Blackshaw Clough (hek/2021/0416).

The Local Plan shows that G12, Bute Street, which is to the west of and adjacent to the application site, is zoned for 30 houses. There is currently an application to build 56 houses on that site (HPK/2019/0215).

There is also an application to build 52 houses on the virtually adjacent derelict site of the former Shire Hill Hospital site to the north east of the application site (HPK/2019/0316). High Peak Borough Council and the applicant are in agreement that the site should be developed for housing – and an appeal due to be heard on 19th July is to determine whether a non-designated heritage asset should be retained and the level of contributions to the local infrastructure. The site was not zoned in the Local Plan; therefore the 52 properties almost certainly to be built would be classed as "windfall."

Given that the hospital site will be developed and that G12 is zoned for development, the application site should be retained as "green space" as it would be the only open space in the area. Building any more houses with access from Bute Street, in addition to those certain to be built on the Shire Hill Hospital site, would be overdevelopment and would remove the last remaining open space.

We have been informed that High Peak Borough Council is shortly due to commence an update to the current Local Plan and that the timetable for the project is currently being developed. As part of the process there will be an opportunity to put forward land for green spaces and Old Glossop Residents Association would wish to put forward this application site with a view to it being used for the benefit of the local community. We would work with The Bureau in Glossop with a view to providing allotments and a community garden with a focus on helping residents with dementia and mental health problems.

The proposals involve the construction of 10 new houses: one 4 bedroom, detached house; one 3 bedroom, detached house; six 3 bedroom, semi-detached houses; and two 2 Bedroom, semi-detached houses. The application site is only 0.22 hectares. Given that the Local Plan refers to an average density of 30 dwellings per hectare, 10 houses would be significant overdevelopment.



We draw your attention to Strategic Objective 12 in the Local Plan: *To encourage the efficient use of previously developed land and buildings whilst minimising the use of greenfield land.* The 52 properties almost certainly to be built on the former Shire Hill Hospital site would give 22 properties over and above those zoned on the Local Plan for the immediate area. We submit that any development on greenfield land in Old Glossop would be overdevelopment.

Proposal to change the junction of Bute Street with Kilmory Fold



The junction of Bute Street with Kilmory Fold taken from the Shire Hill Hospital end of Bute Street. Priority is currently with traffic coming out of Kilmory Fold.

The applicant proposes to change the junction between Bute Street and Kilmory Fold. This is the only way they can accommodate 10 driveways directly from Bute Street. The proposal is that the junction would be reconfigured to remove the build out, making Kilmory Fold the minor arm at the junction and making Bute Street the major traffic flow.

The applicant contends this would provide an improved arrangement given the increase in traffic on Bute Street as part of the redevelopment of the Shire Hill Hospital (HPK/2019/0316) and the development of housing allocation G12. We dispute this.

The build out referred to is an area of footpath that juts out and is an important calming measure. When Shire Hill Hospital was operational (it closed in 2018), the build out prevented traffic speeding along Bute Street in order to enter or exit the hospital site. Removing it and reconfiguring the junction to give Bute Street traffic priority would result in traffic speeding along Bute Street, putting pedestrians at risk. The junction should remain as it is.

Traffic Issues



Map showing the road layout of Old Glossop and approximate location of application site in red

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). Bute Street is only 6.1 metres wide, accessed by the narrow one-way system at Thorpe Street or by Blackshaw Road, a steep, winding road. Both routes have weight restrictions and parking is an issue.

The road outside the application site is used by Glossop residents and visitors from further afield to park their cars when walking into the Peak District National Park from Bute Street along Blackshaw Clough. The proposal has 10 driveways from Bute Street. While the plans show two car parking spaces on each drive, there isn't enough space between the drives for any parking on the road. This would remove any parking along the stretch of road in front of the development site. Visitors to the houses and delivery vehicles would either park on the opposite side of the road, obstructing access for emergency vehicles, or would park on the opposite side of the road on the pavement, obstructing access for wheelchairs, mobility scooters, prams and buggies, and endangering pedestrian safety.



Parking is already a concern in the immediate area. Two vehicles are parked on the pavement outside a house with two vehicles on the driveway. The vehicles parked on the pavement are obstructing access for wheelchairs, mobility scooters, prams and buggies, endangering pedestrian safety.

Because there is hardly any public car parking available in Old Glossop, the reality that visitors wishing to access the National Park would either park on the opposite side of the road, obstructing access for emergency vehicles, or would park on the opposite side of the road on the pavement, obstructing access for wheelchairs, mobility scooters, prams and buggies, and endangering pedestrian safety.

Fire engines require access from Bute Street onto Blackshaw Clough when tackling fires in the Peak District National Park or training and need a minimum clear width of road of 3.7 metres. The area near Swineshaw Reservoir is a beauty spot which attracts many local people in good weather and the risk of fires starting from barbecues or discarded cigarettes is an issue. During the current heatwave, a fire engine has been using that access daily. The loss of on-street parking from having 10 driveways from Bute Street to the proposed development would cause parking issues and obstruct access for fire engines to the National Park.

The amount of traffic coming through Old Glossop is already a concern. Church Street is being used as a cut through/rat run by motorists avoiding Glossop town centre traffic lights. Planning permission was granted to build 31 properties at the Hawkshead Mill site. Building is almost complete and the extra traffic generated has exacerbated the current traffic problems. Granting permission for another 10 houses would generate at least 20 more vehicles, compounding traffic issues. Given the narrow streets, the number of parked cars on the roads and the lack of pavements, pedestrian safety would be severely compromised.

The traffic entering and leaving Glossop is an issue. The Local Plan, adopted in April 2016, states: "The A57 and A628 in Glossopdale are heavily used trans-Pennine routes. These routes and surrounding networks suffer from traffic congestion and associated environmental, economic and social problems. Evidence from the A6 Corridor Study and Local Plan Transport Study indicates that development within High Peak will further increase traffic on these routes." At 2.22 it states: "Traffic congestion is a significant issue within the market towns" (this includes Glossop).

Since the Local Plan was adopted, traffic in Glossop and Old Glossop has increased due to the number of new houses built, 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. There should be no further housing developments in Old Glossop except on brownfield sites until the highway infrastructure in and around Glossop is improved.

Local Infrastructure

We draw your attention to the following provisions in the Local Plan:

Local Infrastructure Provision 5.186 The approach towards infrastructure including health and social care, transport, utilities, waste management and communications is to make the most of the capacity of existing infrastructure, encouraging behavioural change where this will enable more efficient use of the existing infrastructure, remedying any major deficiencies in existing infrastructure and providing new

infrastructure that is needed to serve the new development proposed in the Local Plan

Policy CF 3 Local Infrastructure Provision The release of land for development will be informed by capacity in the existing local infrastructure to meet the additional requirements arising from new development. Suitable arrangements will be put in place to improve infrastructure, services and community facilities, where necessary. This will be achieved by:

- Providing for health and social care facilities, in particular supporting the proposals that help to deliver the Derbyshire Health and Wellbeing Strategy and other improvements to support local Clinical Commissioning Groups.
- Requiring that new development is suitably located and supported by appropriate complementary measures to ensure accessibility to services and jobs and the health and well-being of local communities
- Facilitating enhancements to the capacity of education, training and learning establishments throughout the Plan Area
- Securing new transport infrastructure, including for walking and cycling that help to address traffic congestion issues and support growth identified in the Local Plan. Improvements should encourage modal shift from the private car where possible
- Providing for strategic enhancement of the energy and utilities networks
- Supporting improvements to telecommunications and high speed broadband infrastructure that does not have an inappropriate impact on the landscape or townscape;
- Ensuring the availability of water and wastewater infrastructure by working with utility providers to promote a coordinated approach to the delivery of development and future infrastructure works
- Supporting the provision of sports related infrastructure in accordance with Policy CF4
- Supporting improvements to or the provision of new waste management infrastructure required to support development
- New development will only be permitted where the infrastructure necessary to serve it is either available, or where suitable arrangements are in place to provide it.
- Arrangements for the provision, or improvement of infrastructure directly related to a planning application will be secured by planning obligation or, where appropriate, via conditions attached to a planning permission. This will ensure that the necessary improvements can be completed prior to occupation of development, or the relevant phase of a development.

The current local infrastructure is insufficient to support any further housing development in Old Glossop. As pointed out in our submissions regarding traffic issues: "Since the Local Plan was adopted, traffic in Glossop and Old Glossop has increased due to the number of new houses built, 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." The highway infrastructure in Glossop, and particularly Old Glossop, has not improved in

the past six years. The development of 30 houses at Hawkshead Grange, which almost complete, has led to increased traffic congestion in Old Glossop and an increase in parking issues on Hope Street. There should be no further housing developments in Old Glossop except on brownfield sites until the highway infrastructure in and around Glossop is significantly improved.

Health and social care provision has not increased in Glossop since the 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 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.

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.

With regard to primary school provision in Old Glossop, we draw your attention to the Glossopdale Sub-area Strategy in the Local Plan:

Supporting enhancements to key community services and infrastructure and connectivity to meet the needs of the local population and support growth by:

Working with partner organisations to enable improvements to school capacity in the area. In particular the following sites will be safeguarded for educational purposes as identified on the Policies Map:...Replacement Primary School and Nursery for Glossop All Saints – Church Street, Old Glossop

To date there has been no replacement primary school and nursery for Glossop All Saints to meet the needs of the local population and support growth.

Flood Risk Management

Although the proposed build is less than one hectare and sits in flood zone one and technically does not require a Flood Risk Assessment (FRA) it should not be seen in isolation from the increased urbanisation of the immediate area. With a site area of 0.544 acres it presently has an annual rainfall equal to 2,226 cubic metres which presently falls on a very efficient natural soak-away. The adjacent estate (Kilmory Fold), within 50 metres of the application site, required the installation of storage tanks to deal with the runoff and drainage issues.

However, the rear gardens of 2, 4 and 6 Kilmory Fold are not connected to surface water sewer. Water that accumulates in those gardens seeps through the ground, passing under Bute Street and the north end of the development site before eventually draining into Blackshaw Clough.



After periods of sustained heavy rainfall, water runs off the application site onto the unadopted road (which is also a public footpath) running from Blackshaw Clough to the former water filter plant which is being converted into a house.



The cumulative effect of the surface water and ground water issues mean on-site disposal of excess surface water would not be sufficient.

We submit that a detailed FRA should be carried out and the applicant should provide a Sustainable Drainage System (SuDS) scheme that is both practical and sympathetic to a semi-rural environment and offers sustainable solutions to a changing environment and the foreseeable problems these changes will create. Additionally, this needs to offer concrete solutions that will deal with the introduction of a significant increase in hard standing in place of natural soak-away. The increase of approximately 1,650 square metres that these proposals will generate cannot be viewed in isolation but must be viewed in a context of both the huge increase in the urbanisation of the area and the effects of global warming which is impacting on peak rainfall intensity. Overall, the need to both limit overdevelopment and address the indisputable impact this will have on flood zones 2 and 3 downstream from the proposed site should be considered.

The Local Plan refers to flood risk management policy at 5.101 The policy is designed to limit the impact of surface water flooding from new development...On green field sites the aim should be to ensure that there is no increase in the rate and volume of surface water runoff... Surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water

management. Development proposals should include an indicative drainage strategy to demonstrate how sustainable drainage will be incorporated into the development.

The application site is a green field site. The amount of hard standing created by building 10 houses with driveways would significantly increase the rate and volume of surface water runoff. Therefore a SuDS scheme is required.

Peak District National Park and Tourism

We draw your attention to the following extracts from the Local Plan:

Development proposals within the High Peak Local Plan area must also have regarding to the National Park. High Peak Borough Council has a duty to have regard to the purposes of the National Park as specified in the Environment Act 1995, namely;

- (i) to conserve and enhance the natural beauty, wildlife and cultural heritage of the national parks; and
- (ii) to promote opportunities for the understanding and enjoyment of the special qualities [of the parks] by the public.
- 2.2 Glossop is the largest town in the High Peak and is a former mill town... It is a gateway to the National Park and due to the proximity of several national trails attracts many visitors...Congestion on the infrastructure in and around Glossopdale is a major limiting factor in enabling growth and attracting investment to the area.
- 2.6 The Peak District National Park Authority has a statutory duty to protect the natural beauty, wildlife and cultural heritage of the National Park, as well as promoting the recreation and enjoyment of the countryside within it. These duties are supported by High Peak Borough Council because of the benefits that they bring to the quality of life for residents of, and visitors to, the area.
- 2.14 The outstanding countryside, diversity of landscapes, and the culture and history of the market towns and villages are attractive features that draw visitors in from the surrounding major conurbations. The tourism industry offers major economic benefits to the area with over 22 million day visits to the Peak District National Park every year. This makes it the second most visited National Park in the world, although visitor spend in the area remains the lowest in England and Wales. The settlements in the Local Plan area play an important role in supporting Peak District tourism by providing a range of tourist facilities and services, while the main market towns in particular provide a gateway to the National Park for people travelling by train from the surrounding cities. (Peak District Sustainable Tourism Strategy, 2000).

The proposed development is for 10 houses on a 0.22 hectare site right at the entrance to the Peak District National Park. Building on this site would deter visitors due to the visual impact.

The site as it currently is, with its view and open aspect to the National Park, is an asset, enhancing quality of life for both visitors and residents. Building on the site

would diminish that quality of life, and the loss of car parking for visitors would them from coming to Old Glossop to access the National Park.

Biodiversity

Section 15 of the National Planning Policy Framework (July 2019) gives specific reference to minimising the impacts of development on biodiversity. Local and Neighbourhood plans also provide guidance towards protecting and enhancing biodiversity, including priority habitats and notable species. The development of the 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. Greenfield sites, and this one in particular, should not be developed in order to protect and enhance biodiversity. Any development proposals for the 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.

A number of large trees on the site have already been felled. Of particular concern, there was a group of three large trees in close proximity, two on the site and one on the other side of the boundary wall, on the public footpath near to where Bute Street joins Blackshaw Clough. With the felling of the two trees on the site, the remaining tree appears to be unsafe and at risk of falling in strong winds.

Sustainable development

Derbyshire County Council Clean Air policy aims to promote a sustainable development through its lifetime by minimising resource use and maximising energy efficiency. For a 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.

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