



Mr Ben Haywood
Head of Development Services
High Peak Borough Council
Buxton Town Hall
Market Place
Buxton
SK17 6EL

5th December 2022

Dear Mr Haywood,

HPK/2022/0456 – ‘Land South of Dinting Vale, Glossop’

We write to register our objection to the application for 100 new dwellings at Adderley Place.

At the outset, we recognise there are some benefits to the application. Family occupancy could lead to 250-300 additional residents. This would have a sustainable economic impact for local shops in Simmondley. It would likely also lead to more consumer spending at Glossop high street, thereby helping the town centre recover after the COVID-19 pandemic.

However, we believe that negative trade-offs outweigh such considerations. The above benefits are not exclusive to the application and can be achieved through other means.

The application has been met with significant levels of opposition which must be considered. Residents currently living at Adderley Place, and whose quality of life stands to be most affected, are opposed to it. Nor does it enjoy wider local support, given the approximately 200 public comments made against it at the time of writing. Furthermore, Adderley Fields Association has an online membership of almost 400 residents and has been campaigning against development on the proposed site for 10 years.

Various conflicting policies have to be weighed against one another to reach determination. On balance, it is our view that the application should be refused for the following reasons:

1. Insufficient developer contributions

Policy CF7 in High Peak’s Adopted Local Plan 2016 (the Plan) states that proposals must meet reasonable costs of infrastructure in order to make a development acceptable.

Hourigan’s Planning Statement, Article 10.14, argues that the application would support public sector employment. However, additional residents would conversely place increased demands on public services such as education and healthcare. No mitigation appears to have been made to address this.

For example, Derby & Derbyshire NHS Trust request £90,000 to offset the pressures of an estimated 250 additional residents in their consultation response. Derbyshire County Council (DCC) use the Developer Contributions Protocol to request £429,414.75 for primary places, £768,700.39 for secondary places and £96,202.99 for SEND provision in ‘Education APPENDIX AYA04’.

DCC set out that Simmondley and Dinting primary schools ‘*would not have sufficient capacity to accommodate the 25 primary pupils arising from the proposed development.*’ This does not include the further 26 primary pupils expected from other approved applications within the normal area. Projections show that Simmondley would reach 273/315 pupil net capacity within 5 years. Dinting has already been oversubscribed with 137/119 pupil net capacity and would reach 147/119 over the same 5 years.



Currently, developer contributions made under Section 106 are: £7,822 cost allowance for libraries and £96,203 for a special educational needs and disabilities (SEND) place – a total of £104,025.

The Devvia Viability Assessment (Devvia), claims *'the assessment of viability in this case clearly demonstrates that the scheme cannot be viable if any further S.106 contribution is required.'* Under 'C. Summary appraisal', Devvia calculate a £1,447,678 profit for the developer. This is grossly disproportionate to the community's clear public service needs.

We contend that the application does not contribute enough for education, healthcare or other items such as recreation. The current listings are insufficient for Simmondley to absorb 100 new dwellings.

2. A57 Dinting Vale and unadopted road risks

Policy CF6 of the Plan lists criteria for accommodating or improving traffic generated; and ensuring development does not lead to the detriment of the free and safe flow of traffic.

First, we understand through a Freedom of Information request that DCC recommended the junction at the new access road would need to provide 2.4m x 54m sightlines. However, SCP's Transport Assessment drawing SCP/210087/SK01 shows a 2.4m x 43m visibility splay with only a 0.5 offset. There are no traffic control measures proposed and we are consequently concerned about road safety.

The access road itself is close to Dinting Primary School, the designated drop-off zone and Girlguiding Pennine HQ. With the A57 south bus shelter being relocated opposite the school, traffic obstructions will be compounded in addition to risks to pedestrians and pupils.

Second, traffic volumes in Glossopdale are already at high capacity with gridlock at peak times – largely due to congestion at Mottram Moor. With 1-2 private vehicles per dwelling, this problem would be exacerbated without any relief. As such, there is also an adverse impact given more stationary cars will emit a higher amount of particulate matter. This raises further air quality concerns for the school.

The Mottram Moor Link Road (the Mottram Bypass) is expected to alleviate traffic pressures in the coming years. However, it will not remedy the dangers of increased traffic congestion and even bottlenecks caused by the proximity of physical installations to Dinting school.

Third, the intersection in WH/DV/PSL/01 between plots 02 and 99 links to a unadopted road and public footpath FP50. This connects to HPK/2022/0353 for 8 dwellings and to a busy main road, Simmondley Lane. This unadopted road, which is single-lane and largely uneven, will almost certainly be used as a ratrun to avoid the A57-Primrose Lane roundabouts.

No considerations have been made for sightlines at the unadopted road like those for the access road. We also understand that residents at Adderley Place have land deeds which totally restrict parking by others and grant only partial access via the unadopted road, with exemption for FP50.

The application will generate more, not less, traffic problems. Additionally, there are outstanding issues regarding the unadopted road which have not been addressed.

3. Lack of affordable housing

Policy DS4 – Adderley Place, Glossop, in the Plan states that development will be subject to compliance with other policies, including the 30% proportion of affordable housing. We note that High Peak have

since conducted a review of the Plan and that Policy H4 (Affordable Housing) is to be given less weight when determining applications.

However, even a reduced weighting cannot be used to directly contravene the Sustainable Community Strategy for ‘*Affordable, decent homes for local people,*’ or the Spatial Strategy that ‘*all new housing developments address the range of housing needs of local people by meeting the requirements for affordable housing.*’

The absence of such a key feature within the application means that it would not serve existing local need for those already in the Glossopdale area. Rather, it appears to cater almost exclusively to overspill from Manchester as the COVID-19 pandemic and changing working patterns have increased demand for rural and semi-rural living.

We find a major discrepancy with Hourigan’s Affordable Housing Statement that ‘*affordable housing provision is not viable.*’ Devvia ‘*C. Summary appraisal*’ includes a projection with affordable housing and Section 106 contributions yet still forecasts a profit of £1,447,678. We interpret this to include 6 Chinley properties with affordable rent; in addition to 12 Trevithick and 12 Brahms properties with a mix of affordable rent and shared ownership.

In light of the Statement, the developer’s current position appears to be that set out in Devvia ‘*D. Summary appraisal*’. This features zero affordable housing but maintains current Section 106 contributions, generating a £5,301,423 profit.

This is an increase of £3,853,745. As such, Hourigan’s claim regarding affordable housing is not only incorrect, but seems to be driven by greed at Simmondley’s direct expense.

4. Environment

Policies EQ5 and EQ8 of the Plan interlink for biodiversity and habitat protections, notably through the requirement that development must not lose more green infrastructure than gained.

Residents at Adderley Place have provided multiple images and recordings of wildlife at Adderley Place, notably barn owls and deer. We therefore echo Derbyshire Wildlife Trust’s consultation response which advises that further information is first required to ensure appropriate habitat valuation and to address outstanding issues around net biodiversity loss.

This is coupled with High Peak’s own motion to declare a climate change emergency, as well as the Environment Act 2021 introducing a legal requirement for development to achieve a 10% net biodiversity gain from late 2023. The latter would, according to High Peak’s own website, likely need to be reflected in an amended or new Local Plan.

Policy EQ11 of the Plan sets out that development should promote the reduction of flood risk by seeking to reinstate the natural floodplain.

We are concerned that the application will cause the loss of a greenfield space which absorbs groundwater run-off, preventing flood risks not just in the area but also along the Glossop Brook stream and for many houses along Dinting Vale.

RSK’s *Flood Risk Assessment Part 1* indicates the Horse Clough watercourse is joined by a further tributary and that ‘*Lidar data suggests that this ordinary watercourse is also culverted through the site and probably joins the Horse Clough culvert at an unknown location within the site.*’ Furthermore,



should the culverts and overland flows become blocked they present a constraint to development, which should not occur within a 16-metre zone from culverts.

Lidar data suggests the existence of a culvert running through the application. Manhole covers in the area give additional credence to this possibility, meaning that the 16-metre zone might have to apply along the various current plots for dwellings and so make them unviable.

The RSK report also concludes with a medium risk to groundwater levels, alongside a recommendation for further investigation. To date, this does not appear to have been carried out and so it is not possible to pass sound judgement of the application.

We believe that there is currently insufficient and inconclusive information to comply with policies EQ5, 8 and 11 before reaching determination.

5. Further development anticipated

Policy DS4 in the Plan allocates 130 dwellings for development. As the application is only for 100 dwellings, this gap can be explained when High Peak's Accelerated Housing Delivery Plan (AHDP), approved in 2019, is factored. The AHDP involves the sale of High Peak-owned land to facilitate the construction of new developments. Adderley Place is one of the key sites listed under the ADHP.

The application is on private land. However, High Peak own adjacent land as it was previously used as a public tip site. *Boundary Plan – Drwg No. WHDVBTP01 RevA* includes two 'hammerhead' roads along the east side of the application and adjoin onto High Peak land.

Any such smaller-scale development for 30 dwellings would benefit from road infrastructure having already been installed and could make use of a 'hammerhead' for a new link road through Kestrel View.

This interpretation supports why the current High Peak Labour administration redirected £125,000 worth of developer contributions away from Simmondley. This had been allocated by the previous High Peak Conservative administration for a new play park and would have regenerated the public tip site.

We are therefore concerned that the application could be used to unlock the ADHP site and 30 more dwellings in Simmondley.

Conclusion

We are grateful to all residents who have spoken with us about the application, offered their advice and completed our online survey. There are myriad reasons why we believe the application is unsuitable but in writing this objection we have summarised the key reasons we believe make the strongest case against it. On this basis, we urge High Peak to reject the application.

Yours sincerely,

Cllr John Haken
Councillor for Simmondley

Hector Marchetti Urena

Stephen Marsden
Candidates for Simmondley