



6 December 2022

HPK/2022/0456: Land at Dinting Vale, Dinting, Glossop

Proposed residential development comprising 100 dwellings including areas of public open space, landscaping and associated works

Thank you for consulting High Peak Access on this planning application.

Planning Statement (8 August 2022)

States that 'all dwellings would meet the Nationally Described Space Standards and the apartments (Chinley house type) will meet the Optional Requirement M4 (2) of Part M of the Building Regulations.' However, no plans of the plans of the Chinley apartments are provided.

Design & Access Statement (DAS) Parts 1 - 4

The DAS states: The structure of this document and the detail within follows the guidance from CABE's 'Design and Access Statements: How to read and use them' (2006) and Part 2, Article 8 of the Town and Country Planning (Development Management Procedure) (England) Order 2010.

We note that CABE also states that the DAS should show 'How access will be achieved – Will all potential users, no matter what their disability, age or sex, be able to enter the site, move around the area, enter the buildings and use the facilities? The statement should explain how consultation with potential users has influenced access arrangements.'

The submitted DAS does not show how access for disabled people will be achieved.

Government advice (in UK Statutory Instrument 2013 No. 1238 Article 4 s.8.3) is that a DAS shall

(c) explain the policy adopted as to access, and how policies relating to access in relevant local development documents have been taken into account;

(d) state what, if any, consultation has been undertaken on issues relating to access to the development and what account has been taken of the outcome of any such consultation; and

(e) explain how any specific issues that might affect access to the development have been addressed.

None of these elements have been addressed in the DAS. The developers have not shown that they have consulted with local access groups or residents on access issues. High Peak Access has not been consulted on the proposals.

External Environment: The DAS states that provisions ‘for the comfort for all pedestrians using the public realm’ include

- a legible layout for visitors;
- all pedestrian circulation routes to be level or gently-sloping (as defined in Section 1, Approved Document M, Access to and Use of Buildings, Building Regulations 2015);
- a new pedestrian link south of vehicular access, providing a dropped kerb crossing for connectivity to Dinting Vale/wider village.

These provisions are welcomed. The applicants should be asked to confirm that appropriate dropped kerbs and tactile paving will be provided throughout the scheme, as required. There is no reference to the footpaths, road crossings, or street lighting being provided to local authority adoptable standards, which would ensure suitable design standards for use by disabled people.

House Types:

High Peak Policy: The applicants should be required to demonstrate how the proposal will meet approved High Peak Local Plan Policies, particularly H3e which relates to New Housing Development:

H3. The Council will require all new residential development to address the housing needs of local people by

- e) Supporting dwellings designed to provide flexible accommodation which is capable of future adaptation by seeking to achieve adequate internal space for the intended number of occupants in accordance with the Nationally Described Space Standard and delivered to meet accessibility standards set out in the Optional Requirement M4(2) of Part M of the Building Regulations.

The High Peak Housing and Economic Land Needs Assessment (HELNA) 2022 states:

Adaptable and Accessible Homes: In addition to the needs of residents living in communal establishment accommodation (C2), there is a need to ensure that suitable provision is made for those living in private housing who do not require care home facilities but may have specific needs, for example for adaptable and accessible homes. (13.113).

On the basis of the above, with up to c.60% of future household growth potentially needing accessible and adaptable homes... **it is recommended that c.50% of new general housing is provided to Part M4(2) standards.** (13.127)

High Peak Access take issue with the interpretation of H3e in the HELNA, particularly in view of the government announcement (in July) that all new housing will be required to meet the M4(2) standard. High Peak Access argue that all

applications for new housing in the High Peak should be to M4(2), in order to meet the current shortfall in accessible homes for disabled people, and to plan for an ageing population.

Nevertheless, the current proposal does not even meet the 50% requirement for M4(2) housing specified in the HELNA.

The applicants should be made aware that the recent dismissal of the Planning Appeal at Redcourt in Glossop (APP/H1033/W/22/3303566) was largely on the grounds that the Inspector was not satisfied that the developer had, or would provide, evidence of compliance with policy H3e in terms of accessibility to meet M4(2) of the Building Regulations. As a consequence the Inspector concluded that 'the accessibility issues identified mean that the proposal would not provide an appropriate housing mix. In that regard, the proposal would conflict with the development plan as a whole and would not amount to sustainable development.'

The application states that 'Houses are to be constructed at a minimum standard of latest Building Regulations ensuring each property has level access for ease of wheel chairs. However, the elevations of all house types, (except for Brahms) appear to have a stepped access to the front door and to other external doors.

In practice, to comply with M4(2) the new build properties should demonstrate:

- Level or ramped access to the ground floor with no steps;
- Every dwelling has a room within the entrance storey with a WC and basin;
- Every dwelling with 3 or more bedrooms or 3 storeys has a room at ground floor level that provides for a WC and Basin and has installed, or room for a level access shower, together with the associated clear access zones;
- All WC doors should open outwards;
- Switches and sockets to dwellings should be sited between 450mm and 1200mm above floor level.

Whilst all the proposed properties have been shown with WC provision on the ground floor, as required by M4(2), none of the dwellings have been identified as complying with M4(2). In the case of the 3 bed properties, and those with 3 storeys, the ground floor WC is not of sufficient size to accommodate a walk-in shower in accordance with the requirement of M4(2).

We request that the applicants be encouraged to revise the proposal, in particular to demonstrate compliance with Building Regulation M4(2), and so meet the requirements of High Peak Local Plan policy H3e and the High Peak HELNA.

We hope that these comments will be helpful.

Yours faithfully,

Joan Rutherford

For High Peak Access.