
From: planningcomments@highpeak.gov.uk
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To: Planning Comments (HPBC)
Subject: Comment Received from Public Access

Categories:

Application Reference No. : HPK/2023/0025 Site Address: Land South of Hollin Cross Lane Glossop Derbyshire SK13 8JH Glossop Comments by: Joan Rutherford

From:

6
Slatelands Avenue
Glossop
Glossop
Derbyshire
SK13 6LJ

Phone:

Email:

Submission: Objection

Comments: Over 300 local residents objected to the previous application (HPK/2020/0334). Most of these objections included concerns about highway safety. In particular, residents of Slatelands Road and Slatelands Avenue raised concerns about the increase of vehicular traffic at the junction of Slatelands Road and Hollincross Lane, an already hazardous junction, and the lack of an intention to provide a pedestrian footpath opposite the proposed vehicular entrance from Slatelands Road.

The National Planning Policy Framework (2021): sets out the Government's planning policies for England and how these should be applied. It is a material consideration in planning decisions. Among other things the NPPF states that opportunities to promote walking, cycling and public transport use should be identified and pursued.

Specifically, that applications for development should:

- ¿ give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas;
- ¿ address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- ¿ create places that are safe, secure and attractive ¿ which minimise the scope for conflicts between pedestrians, cyclists and vehicles.

Appeal Decision: The Inspector's report on the previous application (HPK/2020/0334) identified three main issues for his consideration. He did not include highways issues, even though the issue of safe pedestrian and cycle movements is a requirement of the NPPF and even though highways issues had been raised by most of the (over 300) local objectors.

The Inspector only noted that ¿At the hearing, comments by third-parties also included a particular onus on the potential impact of the proposal on local roads including concerns in respect of the adequacy of the appellant's Transport Statement, visibility issues for drivers at the junction of Slatelands Road and Hollin Cross Lane, a prevalence of on street parking in the area and the absence of a footway to the southern section of Slatelands Road.¿ The Inspector did not examine the applicants in relation to these issues.

The Inspector noted that ¿the highway authority confirmed it could not substantiate an objection on highway safety grounds and the Council did not refuse planning permission on the basis of such matters.¿

Derbyshire CC's (pre-application) Scoping Correspondence relating to HPK/2020/0334 stated that:

'The [access point from Slatelands Road] will result in a significant increase in vehicular use of the existing (modified) access with the existing highway and, quite possibly, a significant increase in vehicular activity at the junction of Slatelands Road with Hollincross Lane the layout of which is substandard to current design criteria. Unless details can be prepared to satisfactorily demonstrate that the proposals will not have an adverse impact on this junction, the layout will need to be revised in order that the majority of vehicular access is taken directly via the Hollincross Lane access'; and

'It is recommended that any formal application submitted for the scale and nature of development being suggested is accompanied by details to allay the concern of significant intensification of use of the aforementioned existing highway junction when compared to extant use of the site and demonstrate new / modified access arrangements, together with an internal layout, meeting current design criteria'.

The current planning application proposes no revisions to the junction of Hollincross Lane and Slatelands Road.

It is beyond disappointing that there has been no comment from DCC Highways with regard to this specific issue, raised by over 300 Derbyshire residents. In particular, that there has been no explanation for the contradiction between DCC Highway's pre-application Scoping Correspondence and the fact that the LHA raised no objection to the previous application.

The layout of the Slatelands Road / Hollincross Lane junction is - in DCC Highways own word - 'substandard' so how can the LHA consider it acceptable not to object to a proposal that would increase the amount of traffic at this junction?

The Transport Statement (TS) submitted with HPK/2023/0025 states in relation to the Slatelands Road / Hollincross Lane junction that 'with reference to OS mapping' sightlines of approximately 43 metres can be achieved from the Slatelands Road give way to the east, and approximately 30m to the west.' The TS concludes that these sightlines are acceptable.

These calculations have clearly been carried out as a desk study and do not reflect the real- world situation. In the real world these calculated sightlines are usually blocked by parked vehicles producing a very hazardous junction for drivers, cyclists and pedestrians. Predicted sightlines based on OS maps offer only a basic outline of the junction (kerbs, etc.) They do not take into account parked vehicles. Residents' vehicles park on Hollincross Lane on both sides of the junction with Slatelands Road. When driving I know the impossibility of being able to see the required standard of 43m east and 30m west before I pull out of Slatelands Road because of the parked cars. The quoted requisite sightlines cannot be achieved.

Introducing double yellow lines in this location to deter parking in this location would not be a solution as this would considerably inconvenience residents of Hollincross Lane and Pikes Lane, none of whom have off-road parking space.

No details are provided to allay the concerns expressed by the LHA in their pre-application Scoping Correspondence. Increasing the number of vehicles using this 'substandard' junction would increase the hazard in this location, for drivers, cyclists, pedestrians and for other road users.

Traffic generation: HPK/2023/0025 amends the previous application such that the Slatelands Road access becomes the primary access, serving 13 properties. 11 are accessed from Hollincross Lane.

13 new dwellings are proposed to be accessed from Slatelands Road. 27 parking spaces are provided to serve these dwellings. It is likely that an average of at least one occupant of each dwelling will work either in Glossop or further away.

Although many journeys to work may be made by walking or cycling in good weather, it is likely that many of these car owners will drive either to work or to Glossop rail station at peak times, particularly in inclement weather, leading to significantly increased pressure on the substandard Hollincross Lane / Slatelands Road junction.

Lack of footpath on Slatelands Road opposite the proposed site entrance: In the current application, Slatelands Road has become the main vehicular access to the site, serving 13 dwellings (the Hollincross Lane access would serve 11). The submitted TS states that 'Footways are also provided on both sides of Slatelands Road to the west of the site.'

This statement is clearly untrue. There is currently no footway proposed on Slatelands Road opposite the proposed vehicular access to the site.

Slatelands Road is a well-used walking route, including to local schools, and is also used by cyclists, mobility scooter-users and occasionally horse-riders. Residents (with no off-road parking space) currently park their cars directly opposite the proposed site entrance on Slatelands Road. There is no footway in this location, and none is proposed in the planning application, so vehicles accessing and exiting the proposed development site would cause a hazard for these vulnerable groups.

In this context the proposal is contrary to national guidance, the High Peak Local Plan and Derbyshire County Council's Local Transport Plan, which all emphasise the importance of encouraging walking and cycling for a range of reasons, including personal health and the reduction of pollution.

Walking and cycling have become even more important in supporting physical and mental health and wellbeing during the pandemic, and also in the context of climate change. The committee should reject this proposal which would make walking and cycling on in this area more hazardous.

I agree with Mr. Drake that the Planning Committee should insist that a representative of the Derbyshire County Council Highways is made to attend their meeting and explain why they believe the increased traffic from the scheme will have no adverse impact to the health and safety of local road users, so that at the very least someone is on record who has the requisite responsibility and accountability.

I urge the Committee to reject this application on the basis of highway safety, public health and pollution reduction. In this regard the proposal is contrary to policies in the Derbyshire Local Transport Plan Three, High Peak Local Plan Policy CF6 and to national policies contained in the NPPF, The Manual for Streets and Gear Change.

Yours faithfully,

Joan Rutherford MRTPI (Rtd.)

Appendix: Relevant Local and National Guidance

The Manual for Streets (Gov.uk, 2007) (MfS) is government guidance on street design. The manual states:

'Street networks should, in general, be connected and permeable. The typical cul-de-sac response creates an introverted layout which fails to integrate with its surroundings' (MfS 4.2.3); and

'Caution must be exercised when planning for cul-de-sacs as they may concentrate traffic impact on a small number of dwellings.' (MfS 4.5.7).

Currently, 34 existing homes (on Slatelands Road and Slatelands Avenue) are served by what is effectively one cul-de-sac with a junction at Hollincross Lane. The proposal would increase the length of this cul-de-sac and add a further 13 homes (ie. 47 in total) served by one cul-de-sac from Hollincross Lane.

Traffic congestion is often experienced at the moment by local residents using Slatelands Road because of the number of cars parked on both sides of this narrow street. It should also be noted that refuse vehicles have from time to time been unable to make collections because of parked vehicles. Increasing the number of properties served by this cul-de-sac will exacerbate these problems.

Gear Change (2020), the Department for Transport's guidance on cycling and walking, states the aspiration that 'Every child is confident and safe walking to school', putting cycling and walking at the heart of transport, place-making and health policy. (p. 26).

Derbyshire Local Transport Plan Three (2011, covering the period to 2026) Key Message ...The Plan must 'mark a path towards more sustainable travel habits, e.g. walking, cycling and public transport... to reduce CO2 emissions and benefit personal and public health'.

'We must have regard to the needs of disabled people and people who are older and have access problems, whether because of needing access with mobility scooters, pushchairs, etc'.

'Take a danger reduction approach so that it is safer to walk, cycle and horse ride'.

'Provide highway infrastructure to assist vulnerable users'.

'Work with Local Planning Authorities to help minimise impacts from new housing'.

'Another aim is to improve cycling and walking environments for short journeys, particularly to Town Centres, workplaces, schools and public transport interchanges' (p. 40)

High Peak Local Plan (adopted 2016) Policy CF6 states 'The Council will seek to ensure that development can be safely accessed in a sustainable manner. This will be achieved by...

Ensuring that additional growth ... is managed and, where possible, accompanied by accessibility improvements, and...

Promoting the maintenance and introduction of appropriate facilities to support cyclists, pedestrians and horse riders, ensuring that development supports the use of local cycleway and pathway networks to improve the choice of travel and ensuring safe access to developments on foot and by bicycle' (p. 142).

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