

From: [Andy Rolland](#)
To: [Planning Comments \(HPBC\)](#)
Subject: HPK/2023/0192 objection - Barratt Homes, land at Nunsfield Farm Buxton
Date: 17 June 2023 21:20:07

44 Nunsfield Road
Buxton
SK17 7BN

17/06/2023

Dear Sir,

Ref: HPBC planning application HPK/2023/0192, land at Nunsfield Farm.

I write to record my objections to the above planning application from Barratt Homes.

Flood risk & mitigation:

Although the developer and consultants acting on their behalf have provided detailed flood risk analyses and mitigation proposals, they only relate to the site of the development. They, correctly, say that the site itself is unlikely to flood, what they don't do at any stage is take into consideration that everywhere downstream of the site is likely to flood.

Section 3.2.1 of their Flood Risk Assessment and Drainage Strategy (R-FRA-11024R-01-B) records the development site as being 'located in an area of very low (less than 1 in 1000) risk of surface water flooding in a given year'. However, in their map and 3.2.2 they acknowledge that land to the immediate West and South of the development site is of medium and high surface water flood risk – areas chiefly associated with Nun Brook. They then acknowledge that 'ground levels in this area are lower than those of the developable area of the site' – in other words, any surface water from the development will flow down off the site and into the Nun Brook. The same document also says in 4.2.4.1 that 'Surface water from the proposed development will drain to this watercourse'.

They themselves acknowledge the problem with some of these statements in 3.2.3 where they refer to the reference sources used to reach their conclusions. 'It should be noted that this map (Figure 3.2 Risk of Flooding from Surface Water) is generated using a broad methodology applied to the national scale. *The model utilises generalised information* of infiltration, sewage infrastructure, rainfall events and catchment topography to route rainfall over the ground surface model. *As such, the analysis does not take account of site-scale factors/characteristics that may exert an influence upon surface water flood depths and extents.*' Basically, a model has been used to assess flood risk that can not (and should not ?) be considered accurate.

The Nun Brook runs along the western boundary of the site. It joins Hogshaw Brook upstream of Lightwood Road, from where they are culverted under houses and businesses to reappear and join the River Wye in Ashwood park.

Downstream of the STW Waste Treatment works in Ashwood Dale, the Wyes flow is constrained in a (approx) 10ft by 10ft concrete trough for a distance of perhaps half a mile. This constriction will only allow a certain volume of water to pass through it at any time. Water which is unable to pass through this section backs up in the river course and inevitably will over top the banks up stream.

In section 4.9.1, the report states 'Proposals are to design the surface water drainage to accommodate the 1 in 100 year storm event ...'

In the 29 years that we have lived on Nunsfield Road, there have been 2 what could normally be considered as 'once in a lifetime' flooding events (October 1998 & August 2019). On both occasions the above scenario resulted in extensive damage to private houses and business premises, as well as extensive flooding & damage (still unrepaired after 27 years ...) in the HPBC owned Ashwood Park. There was also a significant impact on other local residents due to the flooding of the Lightwood Rd/Charles Street/Nunsfield Road junction, effectively marooning residents on Nunsfield Rd, Brooklands, Ash Terrace as well as sections of Lightwood Road.

As an additional consequence of these events, there are now a number of residents who are unable to acquire home insurance because of the past and ongoing flood risk.

4.9.1 again – 'Clearly there is a risk of this storm event being exceeded, albeit this risk is considered very low.' This refers to the risk of 1 storm in 100 years, when in actual fact there have been 2 in 30 years – although their research is of course only concerned with the development site, which was unaffected by either event (being upstream of the watercourse ...). They then state '*In such an event the proposed drainage systems will become overwhelmed and overland flows could occur. Overland flows will be directed to follow the path that overland flows currently follow.*' In other words, directly into the Nun Brook which is already acknowledged to be a medium to high flood risk zone. Statistically 2 events in 30 years make further events far more likely than using a model (already considered flawed ?) which suggests 1 in 100 years.

The simple reason these floods don't currently happen on an even more regular basis can be directly attributed to the fact that the land of Hogshaw and the wider open space in that area absorbs rainfall and delays its release into the water courses. However, due to climate change, we are currently experiencing a period of warmer, wetter weather. This will lead to increased levels of rainfall and more frequent flooding events.

In the event of *any* development of the land at Hogshaw, *any* increase in the amount of 'hard landscaping' combined with new drainage systems discharging into the existing watercourses is almost certainly going to increase the frequency of flood events such as we have experienced previously. These are going to have a huge physical, financial and psychological impact on local residents. Not only that, but the transport infrastructure of the town is going to suffer, together with an associated economical impact on businesses affected by road closures.

Referring to the National Planning Policy Framework 2012:

'**150.** New development should be planned for in ways that:

(a) *avoid increased vulnerability to the range of impacts arising from climate change.*'

'**155.** Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime *without increasing flood risk elsewhere.*'

And, **most significantly** ...

'**163.** When determining any planning applications, *local planning authorities should ensure that flood risk is not increased elsewhere.*'

It is clear that any development of land at Hogshaw is highly likely to 'increase the flood risk elsewhere', i.e. *anywhere* downstream from that location.

This whole issue should be considered to be of paramount importance to *any* further development in Buxton that is situated upstream of the STW Waste Treatment works in Ashwood Dale, as any increase in water input in to the Wye and its tributaries *will* lead

to increased flooding at that location.

Financial viability:

In *HPBC Site Delivery Report, Land at Hogshaw (B3, B4), 12th January 2015* there is a declaration that any developer of land at Hogshaw will possibly find that if they were to comply with the UK Government allocation for affordable housing it is unlikely they will be able to make the development profitable:

'At 10% affordable housing provision the results are viable although combined with Code Level 4 and CIL the results become more marginal'

Again, from NPPF 2012:

'64. Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least *10% of the homes to be available for affordable home ownership ...* '

This fact is acknowledged by the developer in their Viability Statement (Roger Hannah, January 2023).

In its conclusion this states 'a full policy compliant provision of affordable housing (30%) is *unviable*.' Therefore, surely on this basis alone – that the development will not be compliant with HPBC (and indeed National Government) policy – this application should be refused.

This same report then looks at the viability of the scheme if 100% of the house were to be sold at full market value. In this case, the conclusion is that the scheme can be '*considered marginal*'. If this is the case then why are the developers pursuing approval (against policy) for a scheme where it is considered likely that they may make a loss ?

Traffic impact:

The A6 into Buxton from the north has queues at most times of the day, due in part to the road layout, the constricted nature of Fairfield Road, and most recently the addition of a roundabout which to date has the sole purpose of slowing traffic even further.

At times, due solely to Fairfield Road, Buxton can be completely gridlocked with stationary traffic on the A6 north and south, B5059 Dale Road, A515 Ashbourne Road, A5004 Long Hill, A53 Leek Road as well as most of the side roads within the town centre.

Each planned house on the Nunsfield Farm development has *at least* 2 car parking spaces, this equates to *at least* an additional 232 vehicles exiting onto A6.

Any additional increase in the volume of traffic in this area is merely going to exacerbate an already critical situation and as such should be avoided at all costs.

In addition to all the above, there is no mention in the Barratt Homes Design & Access Statement (December 2022) of any EV charge points nor solar panels. Whilst there is an acknowledgement from the developers that the homes will be energy efficient, surely in the current climate emergency – as declared by High Peak Borough Council on 15th October 2019 – the council should be doing everything in its power to reduce carbon emissions and promote the use of alternative energy sources ?

In conclusion, the development proposal by Barratt Homes in HPK/2023/0192 should be refused on the basis that it:

- a) is not compliant with local and national policy on affordable home allocations.
- b) it does not comply with the National Planning Policy Framework 2012 in terms of

flood risk and mitigation and that the modelling and analysis is flawed.

c) it will increase the flood risk to areas downstream of the site.

d) it will adversely contribute to an already critical traffic situation on the A6 Fairfield Road.

e) it does not align with the local and national desire to reduce carbon emissions and encourage alternative transport and energy sources.

Kind Regards

Andy Rolland