



High Peak Borough Council

Land at Dinting Vale, Dinting, Glossop

Application Ref. HPK/2022/0456

**Review of Landscape & Visual Impact Appraisal produced by
TPM Landscape Architects**

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1.0 INTRODUCTION

- 1.1 FPCR have been commissioned by White Peak Planning, on behalf of High Peak Borough Council (HPBC), to review the Landscape and Visual Impact Appraisal produced by TPM Landscape Architects and other relevant associated landscape documents submitted to accompany a planning application by Wain Homes, Application Ref. HPK/2022/0456.
- 1.2 This independent review has been undertaken by FPCR a Landscape Institute registered consultancy, that has undertaken and reviewed landscape character assessments, and landscape and visual impact assessments for a wide range of development proposals.
- 1.3 The work has involved a document review and a site visit during December 2022. The review has been undertaken in accordance with Landscape Institute Technical Guidance Note 1/20 which provides a structured and consistent way to analyse whether the Appraisal reflects the approach advocated in the industry standard methodology (referred to as GLVIA3) and has led to reasoned and transparent conclusions. The review process is detailed in Section 2 with the findings summarised in Section 3.

2.0 METHODOLOGY AND REVIEW

- 2.1 Landscape Institute Technical Guidance Note 1/ 20 (10 Jan 2020), sets out a framework for carrying out reviews of LVIA's in a structured and consistent way that reflects the approach to assessment advocated in GLVIA3.
- 2.2 TGN 1/ 20 sets out that there are three main components of a review of a LVIA or LVA leading to a report containing the overall conclusion in respect of the completeness, competency and reliability of the LVIA/ LVA.
 1. Checking the methodology used to undertake the assessment, the criteria selected (including balance between), and the process followed.
 2. Checking the baseline, content and findings of the assessment.
 3. Checking the presentation of the assessment findings.
- 2.3 The TGN sets out a series of questions or headings by which the LVIA is examined. These questions have formed the basis for review as set out in the following sections.

Step 1. Checking methodology, criteria and process

- 2.4 This section of the review checks the methodology, scope and process used in the assessment and how these relate to GLVIA3. This involves reviewing the following:
 - a) ***Does the scope of the assessment meet the requirements set out in the Scoping Opinion and/ or as defined in the LVIA or LVA and if substantively different, are the reasons clearly set out and explained?***
- 2.5 The project is not subject to a screening request or scoping opinion as it is not of a scale or nature to warrant an EIA. The LVA provides the information set out within the methodology although this is very brief and lacks specific detail including reference to GLVIA3.
 - b) ***What consultations have been carried out and have responses been acted upon?***
- 2.6 No landscape consultations appear to have been carried out. For a scheme of this scale, it is good practice to seek agreement with the Local Planning Authority (LPA) of the viewpoints to be used

for the LVA before the assessment is carried out however there is no evidence of this. That said, the LVA contains a range of nearby and more distant viewpoints that seem to provide a reasonable representation of views.

b) Has the scope and methodology of the assessment been formally agreed with the determining authority? If not, why not?

- 2.7 The scope and methodology for the LVA does not appear to have been agreed with the LPA however the project does not constitute EIA development.

c) As part of the methodology, has the terminology been clearly defined, have the criteria to form judgements including thresholds been clearly defined and have any deviations from good practice guidance (such as GLVIA3) been clearly explained?

- 2.8 The methodology for the assessment is set out in section 1 of the LVA. Whilst it refers to best practice guidance it does not specifically mention GLVIA3, or the Landscape Institute Technical Guidance Note (TGN) 02/21 “Assessing landscape value outside national designations”, which provides up-to-date guidance on the factors to consider. There is no definition of landscape susceptibility (an assessment of landscape value and landscape susceptibility is needed and then combines to form the overall landscape sensitivity), and no magnitude of change or judgement criteria or thresholds are set out. The methodology does not set out any detail relating to the visual assessment, receptor sensitivity (although this is in part briefly covered at section 4 of the LVA), magnitude of change, judgement criteria or thresholds.

- 2.9 Although the LVA states that its intention is not to give “detailed levels of landscape and visual impact and significance”, it is expected, for a scheme of this size, to include overall judgements upon both the landscape and visual receptors that have been identified as part of the appraisal.

d) Does the assessment demonstrate a clear understanding and provide a separate consideration of landscape and visual effects?

- 2.10 The assessment includes separate considerations of the landscape character (section 3) and the visual resource (section 4), demonstrating an understanding that these elements are separate yet related. A separate consideration of ‘potential landscape change’ and ‘potential visual change’ is included at section 5.

e) Does the assessment demonstrate comprehensive identification of receptors and of all likely effects?

- 2.11 In terms of landscape, the appraisal briefly covers the relevant landscape character area however there is no reference to the HPBC Landscape Character Supplementary Planning Document (SPD5, March 2006), landscape sensitivity and landscape change however it does not assess the likely effects, relying upon the fact that the LPA have allocated the site for residential development and have “determined that this location is sustainable for development and that it has a capacity to change without undue harm to the receiving landscape” and stating that there will be adverse effects but not to what degree.

- 2.12 The appraisal identifies visual receptors; residential, public footpath users, and road users, which are represented through eight viewpoints. There is no mention of the potential for views from the adjacent settlement of Gamesley. Whilst there may well be no intervisibility between the village and the site, this should be considered as part of the appraisal given its close proximity.

- 2.13 A simple summary table would be an appropriate way to set out the various receptors, perhaps under headings such as residents, users of rights of way, road users and other receptors. For each of these receptors within these categories, the sensitivity, magnitude of change and overall effects at construction stage, year of completion and year 15 could be set out. This is a typical approach within the profession but has not been provided. It would demonstrate the thinking behind the identified potential landscape and visual effects in a comprehensive and transparent way.

f) Does the assessment display clarity and transparency in its reasoning, the basis for its findings and conclusions?

- 2.14 As set out above, a table for the landscape and visual effects would make the appraisal clearer and more transparent and is usual/ expected for a scheme of the size proposed. That said, the reasoning behind the landscape effects could be more clearly and fully set out within the text, as it affects a smaller group of receptors.

Step 2. Check the baseline, content, and findings of the assessment

- 2.15 This stage in the review process considers the description of the baseline, both in narrative as well as in illustrations by plans, photographs and drawings etc. This also includes publicly available aerial photography, and other available resources. A site visit has also been undertaken to check actual findings of the assessment.

- 2.16 This stage of the review includes the following:

a) What is the reviewer's opinion of the scope, content and appropriateness (detail, geographic extent) of both the landscape and the visual baseline studies which form the basis for the assessment of effects (supported by appropriate graphic such as ZTVs etc as appropriate)?

- 2.17 The appraisal briefly covers landscape related local planning policy and local published landscape character assessment, including key characteristics. The Visual Envelope (VE) is considered at Section 5 but it would be helpful if this was clearly identified on Figure 8: Viewpoint Locations. While the extent of the study area appears reasonable, including the VE on Figure 8 would enable the representative viewpoints to be seen in context with it and offer more transparency.

- 2.18 Although brief, the baseline descriptions are at an appropriate level of detail for an assessment of this nature. No topography plan is included which would be very helpful given the varied landform across and surrounding the site.

b) Has the value of landscape and visual resources been appropriately addressed (including but not necessarily limited to) considerations of: local, regional and national designations; rarity, tranquillity, wild-land and valued landscape?

- 2.19 Landscape Value has not been specifically addressed, in a manner expected within an LVA for a scheme of this size. Landscape Value, of the site and the landscape it is located within, should have been addressed, and the latest guidance is found in TGN 02/21: "Assessing landscape value outside national designations". Whilst this is not prescriptive, it does give a recognised range of factors that are helpful in considering landscape value and ultimately in providing a more robust assessment.

c) Have the criteria to inform levels of sensitivity (both landscape and visual) and magnitude of change been clearly and objectively defined, avoiding scales which may distort reported results?

- 2.20 No criteria for susceptibility to change, value, combined sensitivity, or magnitude of change are included within the appraisal.

d) How well is the cross-over with other topics, such as heritage or ecology, addressed?

- 2.21 Ecology is briefly touched upon at 3.4 in respect of planting and biodiversity guidelines for the Settled Valley Pastures Landscape Character Type, however there is no further cross-over and heritage is not covered.

e) Is there evidence of an iterative assessment-design process?

- 2.22 The proposed development is briefly outlined at 1.5 however there is no mention or evidence of an iterative design process informed by the findings of the landscape and visual appraisal.

f) Is it clear how the methodology was applied in the assessment, e.g.: consistent process, use of terms, clarity in reaching judgements and transparency of decision-making?

- 2.23 TPM state within their methodology that, *“it is not intended as part of this landscape appraisal to indicate detailed levels of landscape and visual impact and significance, rather to give an outline and overview of the receiving landscape and potential effects which may occur...and the effects of proposed mitigation measures on reducing these effects”*. However, the potential effects and proposed mitigation measures (and how these reduce the effects) are not clearly set out and no overall judgements are included within the appraisal. Section 5 of the appraisal includes several ‘adverse’ judgements but there is no clear trail of how these conclusions have been reached – this is where a simple table would provide a complete and more transparent summary of the landscape and visual effects. The conclusions are inconsistent in that some receptors are given an ‘adverse’ ‘change’ or ‘effect’ and others are not concluded with any form of judgement at all. It states that *“other local footpaths to the north...have no clear views of the proposals”* however V5 depicts the site and adjacent existing properties; Avening and Adderley Place so it would be a reasonable assumption to make that the proposals will be seen, albeit partially, from this footpath.

g) How appropriate are the viewpoints that have been used?

- 2.24 The viewpoints provide a reasonable spread of locations – from close to the site to more distant.

h) How appropriate is the proposed mitigation, both measures incorporated into the scheme design and those identified to mitigate further the effects of the scheme, and mechanisms for delivering the mitigation?

- 2.25 The proposed mitigation is not clearly described within the appraisal, although it is described within the Design and Access Statement accompanying the application. The site layout appears to show the boundary vegetation retained as far as is practicable with new planting along the western edge of the site adjacent to Adderley Place, Avening and Woodside View (although the detailed planting layout is not consistent with this). Existing retained and new tree planting is proposed along the northern edge of the new housing, within the open space, as well as along the public right of way crossing the site. This, together with the internal tree planting throughout the layout, will help ‘break-

up' the roofscape in the wider, more elevated, views. Additional areas of open space and a 'green' route linking the public footpath with the residential area to the south should be explored – this could be a more direct link along the primary road, and a more meandering link along the eastern perimeter as a separate route rather than as part of the highway infrastructure as currently indicated. A comprehensive management plan should be secured by condition.

i) What is the reviewer's opinion of the consistency and objectivity in application of the criteria and thresholds set out in the methodology for assessing the sensitivity of receptors, the magnitude of changes arising from the project, the degree/nature of effects, and the approach to judging the significance of the effects identified, in the case of EIA projects?

2.26 This is not an EIA project. Comments as 2.21 and 2.24 above.

j) What is the opinion on the volume, relevance and completeness of the information provided about the development or project including, where relevant, detail about various development stages such as construction, operation, decommissioning, restoration, etc.?

2.27 The information provided is relevant however it does not go into sufficient detail for a scheme of the size proposed, with no overall judgements of potential level of effects. Different development stages – such as construction, completion (year 1) and establishment (year 15) are not covered within the appraisal.

k) Does the document clearly identify landscape and visual effects which need to be considered in the assessment? and

2.28 The appraisal identifies landscape and visual receptors but does not assess the likely effects upon them.

l) Have levels of effect have been clearly defined and, in the case of LVIA, have thresholds for significance been clearly defined and have cumulative landscape and visual effects been addressed?

2.29 Levels of effect are not clearly defined. As a non-EIA landscape and visual appraisal, thresholds for significance are not required.

Step 3. Critique of the presentation of the findings of the assessment

2.30 This phase of the review involves examining the 'presentation' of the assessment including report text, figures/ illustrations, visualisations, and other graphic material forming the LVIA or LVA, and answering the following:

a) Does the LVIA/ LVA display transparency, objectivity and clarity of thinking, appropriate and proportionate communication of all aspects of the assessment of landscape and visual effects, including cumulative effects.

2.31 The approach and methodology set out in the appraisal is generally transparent and objective however the level of appraisal is disproportionate to the type of project being assessed. Weaknesses and omissions have been identified, including the lack of detailed assessment and overall judgements of effects upon both landscape and visual receptors. The provision of a simple table of the visual effects, set out by receptor would enable a clear and transparent trail of how the overall judgments and conclusions are reached.

b) Have the findings of the assessment been clearly set out and are they readily understood?

2.32 The findings are briefly set out at Section 5 of the appraisal and can be understood.

c) Has there been clear and comprehensive communication of the assessment, in text, tables and illustrations?

2.33 The brief text is generally easy to read and clear. Tables are not included and would be helpful to set out in summary the assessment thought process and judgments – which the appraisal is lacking – comprehensively. Illustrations are limited.

d) Are the graphics and/or visualisations effective in communicating the characteristics of the receiving landscape and visual effects of the proposals at agreed representative viewpoints?

2.34 A topography plan is not included and would be very helpful, given the varying landform of the site and local area. No visualisations are included yet may have been appropriate from the distant views (viewpoints 5/ 6/ 7). It is helpful that the viewpoints indicate the approximate site extents however they are not set out in accordance with LI TGN 06/19 and do not include specific data for each viewpoint such as date and time the photo was taken, the camera make and model, the horizontal field of view and the direction of the view.

e) Are the graphics and/or visualisations fit for purpose and compliant with other relevant guidance and standards?

2.35 The plans are not to scale, it would be helpful if they were, and the viewpoints are not in accordance with LI TGN 06/19.

g) Is there a clear and concise summation of the effects of the proposals?

2.36 The appraisal includes a simple summary of the identified landscape and visual receptors, the likely change to landscape receptors as well as local views potentially experienced by visual receptors, along with a brief conclusion.

3.0 CONCLUSIONS

3.1 This section summarises the review and addresses the following points:

1. Confirmation of the brief issued to the reviewer setting out the scope of the review.

3.2 FPCR's brief for the work was to provide an independent review of the appraisal work submitted with the application. The agreed brief included a review of the material, in accordance with Landscape Institute TGN 1/20 "Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs)".

2. A summary of how the review was undertaken.

3.3 The review involved a site visit and a review of submitted planning documents including the 'Landscape & Visual Impact Appraisal', 'BDC Colour Site Layout' and the 'Design and Access Statement'. The review also included a study of aerial photography and relevant landscape character assessments including HPBC Landscape Character SPD.

3. A summary of findings of the review of the assessment methodology.

- 3.4 The appraisal includes a very brief methodology which lacks specific detail including reference to GLVIA3, or the Landscape Institute Technical Guidance Note (TGN) 02/21 “*Assessing landscape value outside national designations*”, which provides up-to-date guidance on the factors to consider and would assist in determining the landscape value of the site and its context.
- 3.5 There is no definition of landscape susceptibility (an assessment of landscape value and landscape susceptibility is needed and then combines to form the overall landscape sensitivity), and no magnitude of change or judgement criteria or thresholds are set out. The methodology does not set out any detail relating to the visual assessment, receptor sensitivity (although this is in part briefly covered at section 4 of the LVA), magnitude of change, judgement criteria or thresholds.
- 3.6 Although the LVA states that its intention is not to give “*detailed levels of landscape and visual impact and significance*”, it is expected, for a scheme of this size, to include overall judgements upon both the landscape and visual receptors that have been identified as part of the appraisal.

4. A summary of findings of the review of the scope of the assessment.

- 3.7 The scope of the appraisal is high level and does not cover all the issues normally included or expected in a landscape and visual appraisal for a scheme of the size proposed. It does however provide a reasonable skeleton structure to develop further and covers an appropriate geographical extent.

5. A summary of findings of the review of the actual assessment of effects.

- 3.8 The appraisal identifies landscape and visual receptors but does not assess the likely effects upon them. The receptors that have been identified seem appropriate.

6. A summary of findings of the presentation of the assessment.

- 3.9 The appraisal can be followed and generally follows a logical approach. The photo viewpoints provide a reasonable representation of views and would assist in making judgments on likely visual effects, which will be mostly limited to an area close to the site.

7. A summary statement by the reviewer in respect of appropriateness, quality, comprehensiveness, compliance and conformity with relevant guidance and regulations.

- 3.10 The LVA is high level and does not follow the guidelines. It is not adequate or comprehensive enough to be proportionate to the size of scheme proposed.

8. Recommendations for further information to be sought (if necessary).

- 3.11 A more detailed and thorough assessment following a robust methodology in accordance with GLVIA3. To include consideration of landscape value, a full assessment of landscape receptors, including local landscape character (the HPBC SPD), and visual receptors. The use of simple assessment tables would be helpful to demonstrate transparency and set out a clear trail of the approach and thinking behind the overall judgements. This would also be easier for non-landscape professionals to follow.

9. Overall conclusions on the adequacy of the assessment and whether it is sufficient to support making an informed planning decision.

- 3.12 Overall, the appraisal is high level and cursory and not considered to be proportionate to or at the level of detail usually expected for the size of scheme proposed and for the purpose of accompanying a planning application. It appears to overly rely on the fact that the site is allocated for residential development and the presumption that HPBC have determined the site “*has a capacity to change without undue harm to the receiving landscape*”. As mentioned at 3.7 and 3.11, the appraisal should be developed further to be robust and to enable the findings to form part of the overall consideration of the planning balance.

APPENDIX A: Review of Proposed Site Layout/ Design and Access Statement

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FPCR Review of Dinting Vale, Glossop for High Peak Borough Council

A – Positives of the Proposals

1. Pedestrian connectivity seems well thought through.
2. Outward facing residential block structure is good practice.
3. The general principles of the primary street and perpendicular secondary streets are a logical solution for the development south of the PRoW. A loose outward facing edge suited to the topography works well too.
4. Positioning dwellings to back-on to the western boundary is logical and an efficient use of land.
5. Use of corner turner dwellings is welcomed.
6. End of street focal building vistas seem to have been achieved throughout.
7. The use of stone walling and grey tiles in principle is appropriate*.
8. The use of stone door/ window headers and sills and stone framing around main entrances is welcomed*.
9. Generally, the proportions and subdivisions of casement windows is suitable for the High Peak, though the use of grilles is unnecessary and not advised.
10. Providing stone walling to the sides of rear gardens facing the public realm is good practice and welcomed*.

** Samples should be approved by HPBC via condition or otherwise to ensure that the quality of materials proposed is adequate for the High Peak. Locally sourced natural materials are always preferred over artificial materials given their longevity and proven suitability for the area.*

B - Review against the HPBC Residential Design Guide SPD2 2005

Para 3.18 – Proposals should be provided for the colour of architectural features such as window/ door frames, eaves details and rainwater goods. All should use the same colour and be subservient to the walling and roofing materials e.g. gunmetal grey. White and black are not preferred. Naturalistic colours are better, not bright but tonal. Consistency is key. Variety through different colours to front doors is welcome and proposals should be submitted or conditioned. Avoid high gloss finishes.

Para 4.1 – It appears that, generally, a Linear Grid settlement pattern is proposed with an Irregular & Organic edge. Overall, this is an appropriate solution, though a straightening of the primary and secondary streets would be a more fitting solution for the High Peak and is encouraged.

Para 4.5 – Of Linear Grids, “Main roads are more likely to have no setback whilst connecting streets have front gardens.” A version of this approach should be adopted in the layout. It is accepted that the historic character of the High Peak was not designed for modern day use of private vehicles, but that should not mean that these dominate the layout design. In particular, the primary street should have a strict character with a consistent setback to front elevations. Side parking would work best here. Frontal parking could be acceptable if the dwelling design partially conceals the parking, a consistent setback is provided, and plots are wide enough to provide the parking required alongside a generously sized front garden (e.g. plots 86-89). Both sides of the primary street should make use of low-level locally sourced stone walls as a boundary treatment to help tie together the street design in a way that is in keeping with local character. Rear court parking may be an alternative approach if these use sufficient landscaping and natural surveillance from neighbouring dwellings. Also, the primary street and its character should continue to the end of the southern edge of development, unless an obvious focal point or ‘end’ to the primary street can be designed around plots 61/72/87.

Para 4.12 – Though the DAS starts to address some of the site analysis recommended in 4.12.2 and 4.12.3, it should go further to demonstrate more precisely how the layout design responds to the site setting. A strict character to the primary street, responding to nearby streets, would be a good starting point. The relationship to open space needs clarifying and possibly improving. Existing trees should be accounted for in the design and made clear in the layout. How long-distance views in and out of the site have been acknowledged and designed for need clarifying, particularly to the northern edge.

Para 4.13 – What makes the site special? Make the design enhance and/ or respond to this. As stated above, views in/ out are important. Also, for example, the design of open space could reflect or be influenced by the character of the existing field such as the use of appropriate species of low-level planting and well-considered positioning of feature trees and their species. The design of the PRoW, its landscaping and relationship to the proposals also needs clarifying and improving.

Para 4.14.3 – Thought should be given to the street hierarchy and different street characters, and this demonstrated in the DAS. The beginnings of this are evident in the layout, but these need teasing out further and strictly adhering to so that there is legibility in the street design and in wayfinding for residents – creating a sense of place.

Para 4.14.4 – Given the length and relative straightness of the primary road, some traffic calming is likely to be required by Highways. These should be designed into the layout at key junctions and alternative surface materials provided to break up the monotony of tarmac. Subject to Highways comments, consider use of tighter corner radii on junctions to help slow vehicles and give clearer direct priority routes to pedestrians, and consider using shared surfaces.

Para 5.1 – The development should respond to the broad housing types identified in the High Peak. These different types could be reflected in the street hierarchy and characters e.g. villas (some 2.5 storey centre of development away from neighbouring dwellings) for the primary street with terraces for secondary streets and cottages for private drives.

Para 5.6 – The use of gables to street-facing elevations (Brunswick, Nelson, Newton, Shakespeare) can be appropriate, though these should be a min. roof pitch of 50°, possibly steeper. Together with an appropriate elevation design, these can then relate better to the historic character of villas. However, consider where these are used in relation to the street hierarchy and street characters.

Para 5.6.1 – Hipped roofs are not appropriate for the High Peak except sparingly used as part of a corner turner type dwelling that references grand villas. Full height gable walls should be used generally, especially along the street scene.

Para 5.7.1e – Apartment block design needs special consideration as it is a new typology for the area. The proposed elevations for the Chinley generally seem appropriate, though the floor plans are needed to confirm this e.g. why no side windows are used, why the 'fake' windows are used, and why the rather plain rear elevations. Some outdoor amenity space, perhaps shared, should be considered in the layout design.

Para 5.12.2 – Garage parking stepped back from the dwelling frontage line is encouraged and the layout generally achieves this. However, the Nelson and the Shakespeare do not work well in this regard as the garage door is very dominant on the projected gables of both. These house types should not be used or, if parking provision allows, integral garages replaced. Alternatively, the Shakespeare could be acceptable if the plan were amended such that the lounge and integral garage were swapped. In any case, integral garage sizes should be sufficiently large enough to accommodate the size of modern cars. Garages are often unused for parking, particularly when they are unsuitably undersized.

Para 5.12.2e – Given the extent of frontal parking (which should be reduced), some material differentiation is needed either on the street or on driveways to avoid excessive tarmac. Consider the nearby example of stone sett paving where the PRoW meets Simmondley Lane as a useful reference point i.e. use a coursed pattern, not a herringbone pattern. Also, consider using car ports with dwelling space above (e.g. to side parking dwellings along the primary street) to increase the efficiency of land use while meeting the design requirements of the High Peak. The same could be utilised for access to rear courtyard parking, if used.

Para 5.12.3 – *"Landscape should be incorporated to soften parking courts and break up extensive areas of car parking."*

Para 6.0 – Traditional details and designs are not necessarily required but the interpretation of them should be explained, particularly when providing contemporary solutions. Specifications or descriptions of the architectural detailing is needed in the DAS to be able to assess the proposals. A consistent approach across the site should be employed.

Para 6.2.2 – Modern porch canopies, particularly timber framed types, are not considered appropriate for the High Peak. It is acknowledged that some parts of the current Building Regulations require a 600 or 1200 mm deep covering to the main entrance (to be M4(2) or M4(3) compliant). Using an inset porch or recessed doorway would be more appropriate. If not meeting the above M4 categories, avoiding porch canopies altogether would be best.

Para 6.2.4 – Do not use plastic or metal variations of traditional timber doors. Provide simple, unfussy design solutions that suit the design of the proposed dwelling. The design for main entrance doors should be clarified in the DAS.

Para 6.3.3 – For windows, *"painted timber frames are preferred to stained, plastic or metal ones."*

Para 6.3.5 – Some of the houses shown in the street scenes appear to use a splayed buff brick window header which is inappropriate. It is noted however that these are not shown in the house type drawings and therefore the street scenes should be corrected. Where headers clash with eaves (Brancaster, Chinley, Newton, Priestley, Shakespeare), consider lowering the eaves and removing the headers, or raising the eaves.

Para 6.3.6 – All windows and doors should use a checked reveal detail whereby there is a 'punched out' appearance to the façade. This detail should be shown in the DAS and secured via a planning condition.

Para 6.3.7 – Bow fronted bay windows are acceptable for larger dwellings. Consider double height bays for the largest dwellings if referencing to villas.

Para 6.3.8 – The 2.5 storey Jenner and Wordsworth have dormers to the front elevations. This is considered inappropriate for the High Peak and should be switched, such that Velux style in-plane roof windows are used to front elevations with dormers (preferably pitch roofed) reserved for rear elevations only, if at all. The proportions of roof windows should follow the same principles as the windows i.e. taller than they are wide and/ or with subdivisions to create this appearance.

Para 6.4.4 – For eaves and verge details, the standard modern approach of white coloured boxed PVC fascia soffits is not considered appropriate for the High Peak. Acceptable options for gutter support include corbelled stone, rise and fall metal gutter brackets, and exposed rafter feet. For verges, simply pointing in mortar is preferred. The use of decorative timber verges (for larger dwellings only) or coped

stone verges could be appropriate, but these would likely feel out of place with the rest of the design approach. The detailing should be clarified in the DAS.

Para 6.5 – Generally, rainwater goods and soil pipes should be subservient. The best way to do this is to use a colour other than black or white that suits the rest of the materiality, avoid using any downpipes on the principal façade and instead position on side elevations with gutter returns. Soil pipes should generally be avoided externally and use internal boxing. How these engage with the roof is critical and modern proprietary products should be used that avoid the need for pipework penetrating the roof, particularly on street-facing elevations.

Para 6.6 – Chimneys can add a degree of interest to the roofscape but are no longer required for a modern house to function. What is important in the High Peak is that some form of vertical emphasis is provided to the roofscape. This is up to the designer to propose. A consistent approach should be included for all dwellings. Refer to the HPBC Residential Design Guide for what is appropriate. Modern ‘mock’/ ‘stuck on’ chimneys should be avoided. Chimneys should be constructed of the same walling material as used elsewhere and use a design that takes inspiration from the local character. Details of this should be provided in the DAS. They should be deeper than they are wide (not square), with min. 2no. pots.

Para 6.7 – Small stone walls should be used as a boundary treatment to front gardens, particularly along the primary street and possibly around the development edge. These could be softened with low-level landscaping/ hedgerow/ shrub planting. Consider how gateposts could be used to add interest to key focal points.

Para 7.2.1 – The layout design is failing to show how it meets the following: *“Open space should be viewed with equal measure so that it is not merely landscaped leftover space but a fully incorporated feature of the scheme.”*

Para 7.2.3 – *“...public open spaces should create usable external areas...”*
The topography of the site makes this difficult, but POS should not be restricted to steeply sloping unusable areas. Consideration should be given to increasing the usable open space provision and making it an integral part of the site design.

Para 7.2.4 – The layout attempts to have a linear open space around the existing PRoW and a larger open space on the banking towards the south of the site. Consideration should be given to linking these spaces with some linear green infrastructure - along the primary street i.e. with the use of a tree-lined verge, and along the eastern perimeter of the site but separate to the highway infrastructure as is currently shown. The character of this primary street needs to be explained in the DAS with plan extracts, sections, and visuals.

Para 7.3 – The footpath around plot 21 will not feel safe and needs a corner turner dwelling to provide natural surveillance. The boundary between private garden and public space should be clearly defined throughout but particularly here.

Para 8.2.3 – Small boundary walls where front/ side gardens edge the public realm are characteristic of the High Peak and should be provided e.g. using stone.

Para 8.2.4 – A concern with the use of the semi-detached Brunswick/ Trevithick is how the level changes around the corner can ensure a step-free approach to main entrances. Given the distance between the main entrances of both these units, it is probably the case that keeping these FFL's the same is practically unworkable in some areas. It may be that the FFL's need to change between these units to allow for this, but if that is the case, care needs to be given to how the roof design joins over the party wall to avoid the ridge of the Trevithick peeping up over the ridge of the Brunswick. Consider using a consistent eaves height and increasing the floor to floor of one or the other to assist with level changes. Alternatively, use detached corner dwellings.

Para 8.3 – The HPBC Residential Design Guide predates the changes to Part M of the Building Regulations that cover the categories M4(1), M4(2) and M4(3) dwellings. However, the description outlined here is similar to the standards set out in M4(2) – accessible and adaptable dwellings. HPBC should consider whether all or some of the dwellings should meet the requirements of M4(2), and perhaps a handful of M4(3) units too. Providing a step-free design on this site will be a challenge and any proposed levels will need interrogating.

Para 8.6.1 – The standard is for a minimum of 21m ‘back-to-back’ distance between rear elevation habitable rooms, with an increase in this distance by 1m for every 0.5m level change. Alongside any changes made to the layout, a dimensioned plan showing the proposed FFL's and distances between rear elevations should be provided showing how this standard has been met. This should include the relationship with the existing dwellings to the north-west.

Para 8.8 – Should HPBC decide to relax its view on the ‘back-to-back’ distances, the designer should still provide a plan showing the proposed FFL's and dimensioned ‘back-to-back’ distances but also show how rear elevations windows avoid directly facing each other.

Para 8.10.8ii – Consider using smaller window sizes on northerly facing elevations and larger window sizes on southerly facing elevations, as was traditionally followed in the High Peak (see also 8.8.2), to aid with natural solar heat gains and reduce heat loss. However, ensure that some level of natural surveillance is present for the street, at least on the ground floor level.

Para 8.10 – Regarding sustainability of the dwellings, has the developer shown how the development will meet the Future Homes Standard and the forthcoming changes to the Building Regulations therein which demand higher standards of energy efficient design? If utilising renewable energy sources such as solar PV's or air source heat pumps, these should be integrated into the dwelling design.

Para 8.11 – It is not clear from the layout how SuDS are to be provided. It is noted that, in the Planning Statement, SuDS will be provided through attenuated underground storage chambers before discharging to watercourses. The locations of these chambers should be made clear or at least conditioned such that they do not obstruct the new tree planting and landscaping proposed.

Para 8.12 – It is not fully clear how ecology has been protected or enhanced, although it is noted that general principles are included within the DAS. The layout does not distinguish between existing and proposed trees. A large amount of tree loss is required for the site entrance which appears to be necessary to enable the development. Other trees of category A and B appear to be lost which could have been avoided with a more careful approach to the site layout design (e.g. trees G1, T1, T10, parts of G3, the south eastern part of W6, and possibly T8). If biodiversity net gain is required onsite, this will likely affect the layout. Thought should be given to how any ecology areas are integrated into the layout.

C – Other Comments

1. When using terraced dwellings, avoid handing one out of the three/ four dwellings. Instead, be consistent with the handing for rows of three. Rows of four could be symmetrical but it is preferred that the same handing be used for all. This will help create a rhythm to the street scene, particularly when level changes are needed between adjoining dwellings. For example, the row of four dwellings for plots 25-28 may work better if they were to step in the middle or even at every party wall, to help ensure a step-free layout design.
2. How is cycle storage being provided? This is integral to providing a sustainable development so that reliance on private cars is reduced.
3. Requirements for back-to-side setback distances are not defined in the HPBC Residential Design Guide. However, current best practice is to provide at least 10m, preferably 12.5m. This should be improved for plots 55-57.
4. A change in surface for private drives has been used. This is welcome and encouraged, however, the Hardstanding Plan states that tarmac with red chipping is proposed. What is the justification for this material? A higher quality material should be used such as stone setts. An alternative to hoggins should be considered for the pedestrian/ cycle routes as this can become easily damaged with heavy use, combined with wet weather, particularly by cycles, making it unpleasant for users.
5. The Planning Statement states that all dwellings except apartments meet NDSS requirements. These requirements include the sizes and dimensions of bedrooms and the amount of storage. Can the developer confirm that the dwellings truly meet all the NDSS requirements, not just overall areas?
6. Drawings showing the plans and elevations of garages and the apartment bin and cycle stores should be provided.

7. The 1.5m deep planting along the western boundary will be difficult to manage and is probably not needed. It is not shown in the planting plan. The land space should be utilised for a tree-lined verge along the primary street.

D – House Type Comments

These are specific comments for the house types. Refer elsewhere for other relevant comments that should be considered for all house types.

1. **Brancaster:** this does not appear to be used on the site layout. Is there a reason to submit this drawing?
2. **Brunswick:** the street-facing side elevation on the house type drawing does not match the street scenes. However, neither are particularly attractive. A better solution would be to use a bow fronted bay window to the centre of the ground floor lounge with a pitched roof, a window centrally above in the first floor bedroom, and the bathroom window moved to the rear elevation. Also, a stone surround should be used to the main entrance as per others, and the kitchen layout is missing.
3. **Jenner:** this appears to use a render wall finish to side and rear elevations. Is this correct? The use of render may be acceptable if not facing the street and subject to the selection of a naturalistic colour. The transition between stone and render should be shown e.g. through the use of larger stone quoins. Also, avoid use of projected lean-to roof over WC/ porch canopy so that there is a simple, straight, unfussy front elevation.
4. **Priestley:** where used on corners, add windows to street-facing side elevation.
5. **Trevithick:** refer Jenner re lean-to roof over WC. Given their comparable floor area, it would be better to avoid using the Trevithick and instead use the Brahms, though the roof pitch may need lowering where adjoined to the Brunswick to ensure its ridge height is lower than that of the Brunswick.
6. **Wordsworth:** the proportions of this dwelling are not in keeping with the High Peak nor the rest of the dwellings proposed on the site. Regardless, it seems to be a 'corner turner' type dwelling yet it is not used in this way in the site layout. As such, the rear elevations do not face the rear gardens. One possible way to use a variation of this dwelling is to rotate it 90° and relate it to the villas found in the High Peak with a narrow frontage and use of bow fronted bay windows, and position these appropriately noting the street hierarchy character proposed. In this scenario, it may struggle to work well as a 'corner turner'.

E – Layout Comments

1. The proposed site access breaks through an existing bus shelter and bus stop. The character of this site entrance needs clarifying. The new access should add to the quality of the street and provide an attractive site entrance.
2. A significant amount of tree loss is required to enable the site access road to work. If new planting is proposed, is this practical on a very steeply engineered slope? How will this landscape area be managed and encouraged to flourish over time and add to the quality of the site entrance?
3. As is currently shown, an unattractive view of closed board fence and rear gardens/ rear elevations faces the site entrance. There is an opportunity here to design a new north-facing frontage on top of this hill. It is appreciated that the block depth and location of gas main/ PRoW make this challenging. Alternative dwelling types may be needed to make this area work. Upgrading the PRoW to one of the new streets would help increase the block depth here.
4. Plots 01 and 100 will be very prominent and should avoid using frontal parking. They need not be corner turner dwellings but should have fenestration to their side walls facing the site entrance. Their proposed FFL's should suit the existing/ proposed topography and not stand out on an elevated plateau. These plots may be positioned too far down the hill to work adequately.
5. The site sections suggest that rear garden levels to plots 03-08 fall immediately from the rear elevation. This is not practical. There will need to be at least some level path or patio for rear garden access. Proposals for how the rear garden levels will work should be provided in section and explained in the DAS e.g. terracing. If these rear gardens are visible from the site entrance as is suggested, then the design of these needs to be explained. Views of uncontrolled garden paraphernalia from the site entrance is undesirable.
6. Where other rear garden levels vary drastically across the block, these areas should also be explained as above. In addition, the High Peak Residential Design Guide states that, for every additional 0.5m level change, an additional 1m should be added to the minimum back-to-back distance of 21m. Judging from the key plan on the site sections, the following back-to-back distances would usually be required and are not yet allowed for in the layout design:
 - a. Plots 09-13 and 18-20 – level change 1.30-1.75m = 23-24m
 - b. Plots 22-28 and 36-43 – level change 2.10-2.20m = 25m
 - c. Plots 51-54 and 62-65 – level change 3.35m = 27m
 - d. Plots 71-70 and 81 – level change 0.75m = 22m
7. The proposed junction crossing of the PRoW and access to plots 99-100 is very convoluted and tarmac dominated. It does not sit well with the current PRoW. Priority of right of way should be given to the PRoW. Alternative material finishes, possibly with a shared surface, and a better blending of the streets should be provided.
8. Plot 02 should have side windows to face the PRoW.
9. There are a few areas that have numerous frontal parking spaces in a row without adequate breaks for landscaping and tree planting (plots 03-05, 10-14, 24-29, 35-44, 51-53, 61-65, 73-77). A tree-planted space of min. width 2m should be provided for every 4no. parking spaces. This may be relaxed to rows of 8no. for areas of terraced housing if alternative material finishes are used (e.g. forming a shared surface 'square' across the street) alongside tree pits.
10. Given the steep levels of the site, care needs to be given to the use of 2.5 storey dwellings so that there are not drastic changes in eaves and ridge heights along the street scene (e.g. between plots 06 and 07). A design rationale for the positioning of 2.5 storey dwellings is needed. They should be grouped and perhaps positioned where level changes are less severe.
11. Plot 08 unnecessarily faces the existing woodland to the east. It should back-on or side-on to the woodland to create a more secure rear garden.
12. Plot 09 is a key focal building and will be quite prominent when arriving at the top of the hill. As such, it should address the site entrance road better, perhaps even rotating 45° to do so. Parking for this dwelling should be hidden from this focal point e.g. side parking behind.
13. It is good that plots 09 and 10 are corner turner dwellings, however the relationship between the PRoW and rear garden walls is not satisfactory. Dwellings on the south side of the PRoW should front onto the PRoW as they do north of the PRoW to create well-overlooked secure space.
14. It is good to see a footpath along the eastern boundary connecting the PRoW and the trodden paths. However, adjacent to plot 21, the path is poorly overlooked. A 'corner turner' dwelling should be used here. In addition, given the levels of the site, if this footpath can be provided step-free so that it is accessible to all, it should be.
15. Street scene B-B shows some significant level changes between dwellings along this eastern edge of the development. How will these be detailed? Slab on edge is not appropriate. If using retaining walls, these need to be of an appropriate material (e.g. stone walling) and shown on a boundary treatment plan. Extra space will be required between plots to allow for the level changes, the associated boundary treatments and the required parking widths.
16. Do not use side parking on the corner for plot 72.
17. The location of apartments 93-98 is inappropriate given the location of the neighbouring dwelling and its security. The parking court also appears to use some of the garden of the neighbouring property. These should be relocated, and a house with rear garden used here instead.

F – Recommendations

1. The northern edge of development should face outwards with an attractive, well-designed frontage for the site entrance, without losing the ability to also face the existing PRow and the site entrance road as it winds up the hill. The block depth, levels, gas main and PRow make this challenging, so consider:
 - a. Using split level housing, which are familiar in HPBC.
 - b. Relocating apartments/ maisonettes to this area.
 - c. Creating a courtyard.
 - d. Backing onto the woodland to the east.
2. A street hierarchy with characters for each type of street should be employed. The characters should be informed by re-interpreting the four broad character types found in the High Peak (refer Chapter 5 Building Form).
3. The primary street should have a consistent character comprising:
 - a. A wide verge along the western side lined with trees providing a green link between the two areas of POS.
 - b. Low-level stone wall boundary treatments to front gardens.
 - c. A consistent setback to the front elevation of properties.
 - d. A consistent approach to parking arrangements.
 - e. A long-distance view from the PRow to the hills south beyond.
 - f. Long-distance views eastwards down secondary streets.
 - g. Potential glimpsed views eastwards between dwellings.
4. A design rationale for the location of 2.5 storey dwellings, avoiding large eaves/ ridge level changes along the street scene, e.g. locate along the western boundary where levels rise westwards to reduce overshadowing.
5. Straighten secondary streets such that a more linear grid block is used as is characteristic of the High Peak and found in nearby streets to the east e.g. Simmondley Lane, Primrose Lane.
6. Arrange the southern edge of the development such that a consistent setback from the street to front elevations is achieved, with no frontal parking.
7. Consider how existing trees such as T10 can be retained and integrated within the layout design e.g. set within POS.
8. Clarify how SuDS will be provided and, if basins are required, make these well-overlooked and integrated into the landscape design e.g. south of the PRow.
9. Consider using a trim trail or other informal play along the PRow/ perimeter path to provide more usable, active areas of POS.
10. Design the new character of the PRow with streets/ dwellings fronting onto it on both sides, with focal dwellings on corners facing it.
11. Re-consider access to north-western dwellings so that a larger, more usable area of POS can be created, better relating to the PRow. Alternatively, leave this relatively flat area entirely devoted to usable POS.

