

Objection to the proposed development Land At, Dinting Vale, Dinting, Glossop, Derbyshire by Wainhomes. Case number: APP/H1033/W/24/3339815

Submitted by: Mrs Julie Greengrass 3, Adderley Place, Glossop, Derbyshire SK13 6PA.

Date: 19th April 2024

High Peak Local Plan – Additional Consultation

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The Council are also reminded that we have raised these issues with the Council on the 4th April 2013. Since our previous representations no additional sites have been identified (Section 5.2). Indeed, the only sites that have been removed are G14 (Hope Street) and G15 (York Street), which have been granted planning consent.

The Council are reminded that to ensure that their Local Plan must be sound and stand up to scrutiny at the forthcoming Examination Hearing. Whilst the Council may consider that the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements and whether it is 'sound' (paragraph 1.8 of the additional consultation report).

Paragraph 1.12 of the consultation document highlights the need for the Council to be certain that the residential sites that they have identified can be delivered and therefore contribute towards the overall number of houses planned during the plan period. It is acknowledged that the Council's latest estimates indicate 416-455 houses per year are required during the plan period, and that if the Council prepares its Local Plan with a housing target that is lower than these figures then the Plan risks being found unsound.

The Council is also reminded that attempting to identify and allocate residential development sites that cannot be delivered will also led to the Plan being found unsound. An attempt to bolster housing numbers through the inclusion of sites such as Adderley Place (130 dwellings) will lead to further scrutiny at the Examination Hearing; the inclusion of a site which has been repeatedly identified has being undeliverable in terms of vehicular access is short-sighted and could result in the whole Plan being found unsound.

As a reminder our previous representations included an appraisal of the vehicular access requirements to access the Adderley Place site. Having noted that the Council identified that the site would 'require substantial access improvements onto the A57' (Section 6.27 of the Preferred Options document) we sought professional advice on the potential of delivering a new vehicular access onto the A57 at the proposed location.

Our transport planning consultants advised that whilst it is possible to deliver visibility splays of 2.4m by 43m in the leading and trailing traffic directions that would be required to deliver a priority junction, the mainline traffic volumes on the A57 would preclude this junction type being appropriate in this location.

In line with Figure 2/2 in DMRB 42/95 a priority junction with ghosted right turn facility would be required in this location, based on the mainline traffic flows. This type of junction cannot be delivered within land that fronts the A57. To demonstrate this the existing carriageway width of the A57 is 8.1m at the proposed site access.

This would need to be widened to a minimum of 9.0m to deliver 3.0m ahead lanes through the junction, as well as a 3.0m right turn pocket to allow turning traffic to avoid turning traffic impeding the mainline traffic heading east towards Glossop town centre. Good practice would be to deliver 3.5m lane widths through the junction, requiring the existing carriageway to be widened by an additional 2.4m to deliver a 10.5m carriageway width.

This widening would require land and properties to be purchased and then demolished to deliver this form of junction, or land taken from the school playing fields on the school side of the carriageway. Both options require land that appears to be outside of the development sites boundary.

This geometric design issue was highlighted to the Council in our representations on the 4th April 2013, and we maintain our position that the Council should not be promoting a site for allocation in the emerging Local Plan where there is the potential for a third party ransom issue to occur to deliver an appropriate vehicular access to the site.

In our previous representations we advised that the alternative access option from the A57 would have to be the delivery of a new signalised junction onto the A57. As with the priority junction options the site access would be close to Dinting Primary School, a facility which in the school AM and PM peak periods generates significant volumes of parking on the A57. Providing a new junction in this location would reduce the available on-street parking in this location for school-related parking, as well as on-street parking for the nearby terraced residential properties that front the A57.

We reiterate that a development of 130 residential units would require a Transport Assessment and Residential Travel Plan to be produced as part of any planning application. This is in line with the Department for Transport's guidance on Transport Assessments, produced in 2007. The Assessment would need to consider the performance, both in terms of capacity and delay, of the introduction of an additional signalised junction onto the A57; our transport consultants have advised that a new three-armed priority junction would require the junction to operate in three stages; with the mainline flows on the A57 waiting to allow traffic exiting the development site to turn onto the A57. The expected operation of the junction would also preclude pedestrians to 'walk with traffic', thus requiring an additional pedestrian stage to be included in the junction signal timings.

By its very nature a three stage signalised junction will increase delay on this section of the A57, which forms part of the strategic highway network in Derbyshire. Based on the current capacity and delay issues on this section of the A57 we maintain our position that the impact of a new signalised junction on the A57 will have a 'severe' impact. In line with the National Planning Policy Framework (2012) paragraph 32, fourth bullet confirms that:

'development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe'.

Even without the benefit of detailed analysis that would be included in a Transport Assessment we consider that the introduction of a new signalised junction on the A57 in this location will have a 'severe' impact, in terms of increased congestion and delay on an already congested section of the strategic road network.

We have also highlighted that the delivery of a new vehicular access onto the A57 is far from straightforward. The new vehicular access would require the relocation

of the Dinting electricity sub-station, as well as having to negotiate the brook adjacent to it. There are also significant level changes from A57 into the development site. We have confirmed in previous representations that Derbyshire County Council (as highway authority) stipulates in its own residential design guidance that new road gradients should not exceed 1:30 for the first 30m of the access to the road junction, and then be no greater than 1:20 for the rest of the route. A review of the level changes indicates there is a level change of at least 15m from the A57 rising into the site. Such a level change would require a carriageway gradient well in excess of the highway authority's design standards, and even if it were technically possible we would expect significant engineering works in the form of embankments and retaining walls to achieve the access. All these works would have a significant impact on the woodland and landscape setting of the site.

We have previously highlighted to the Council that the proposals to link the 130 unit residential development site linking with Kestrel View on the Simmondley estate would not accord with Derbyshire County Council's adopted residential design standards. It is a shared surface design, where pedestrians use the carriageway alongside vehicular traffic. The lack of continuous footways on each side of the carriageway of Kestrel View shows this to be the case.

Derbyshire County Council's residential design guide confirms that a street of this type should only access 25 residential units from a single access point. As there are already 26 properties accessed from Kestrel View (including properties on Curlew Way) there is no opportunity for this route to serve any additional residential units.

The only other potential access point is via the unmade private track adjacent to the Zion Church off Simmondley Lane. This is a very narrow and unmade track which in parts has insufficient width to allow two private cars to pass. This track also has a public footpath running east/west along its route. The route is not suitable for high volumes of traffic and the 2.4m by 43m visibility splays recommended in Manual for Streets cannot be delivered onto Simmondley Lane. It is understood that vehicular rights of access are only permitted in any case for the residents of Adderley Place and the Scout Hut. The residents of Adderley Place along with the Scout Hut fund and maintain the condition of the footpath in a reasonable state to allow our vehicles to travel at appropriate slow speeds along this track. Any additional traffic on this track would be to the detriment of pedestrians using this public right of way, and the track is of insufficient width to provide a continuous segregated footway between the site and Simmondley Lane.

Our previous traffic and transport representations on the Adderley Place residential allocation identified a raft of technical constraints with delivering appropriate access to the site. We respectfully request that the Council reconsiders its position regarding the promotion of this site, particularly with regard to the need for the Council to demonstrate that its Local Plan is sound at the forthcoming Examination Hearing, where we hope to make further representations.

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I am a long-term resident of Adderley Place, having lived here for the past 16 years. I've worked from home for the last 12 years and being a dog owner I am a daily user of the field at Adderley Place and a frequent pedestrian, cyclist, and motorist along the lane that crosses the land planned for development. Therefore, my connection with this area is substantial and emphasizes my personal and vested interest in its preservation.

I object wholeheartedly to the development by Wain Homes on the land at Dinting Vale, or as we know it, the fields at Adderley Place for the benefit of not only the residents of Adderley Place, but for the benefit of Glossop residents and the wider area. Please see below:

1. False Transport Assessment

- i. Assessment of traffic on the A57 was carried out by Wain Homes during roadworks on the A57 in the vicinity of the proposed access road and a much-reduced traffic flow. Every day, especially around school drop off and pick up the road is heavily congested, with standing traffic in both directions.
- ii. Highways have not visited the site. I believe that if they had they would see that to put an access onto the A57 at the proposed point would be more dangerous for pedestrians, especially children when trying to cross and make it impossible for emergency vehicles to enter or leave Glossop with any speed as there would be nowhere for the traffic to move to. This is already an issue for emergency vehicles trying to access Glossop from Wooley Bridge.
- iii. Traffic modelling hinges around public transport links and therefore less car travel. However, the suggestion that Dinting Station is within 700m of the site and easily walkable is laughable. This omits that the station is also at the top of a very steep, poorly lit, rough surfaced, path that is inaccessible by wheelchair or those with a pushchair. It is not gritted in winter, making it dangerous. The proposed route down the footpath at the side of Adderley Place is made from slippery rock slabs, often muddy, similarly steep. To use FP50 exiting on Simmondley Lane and walking to the Station on pavement via the A57 and Shaw Lane is more than double the distance.
- iv. All the distances from local amenities do not consider the gradient to access things such as Gamesley community Centre, Dinting Station etc.
- v. Assessment does not include the 30+ houses that are proposed to be built on Council land adjacent to this development, using the same road infrastructure (according to the planning officer's information).
- vi. Documents submitted by the council for the development of the land noted in point 1.v. offer Kestrel View in Simmondley as an access despite not being viable (see separate report attached). There is the possibility of Kestrel View, if opened up for this piggy-back build being subject to the access of large plant to access the Adderley Place build.
- vii. At the point of adding the site into the Local Area Plan, an independent consultant reviewed the plans and objected to the development access from the A57 for many reasons. A key reason: no right-turn lane included in the plan on the A57 into the new access. Note that the A57 is not wide enough to allow for a right turn. In the application the developer has only suggested a traffic-controlled junction, causing further congestion on the A57. See separate document.
- viii. The 1:10 gradient on the access road is also being accepted due to a development at Linglongs Rd in Whaley Bridge that is of a similar gradient. This could set a standard for future developments. The danger of 1:10 gradients during winter is that pedestrians, cyclists, and vehicles will struggle to use the access safely when it is icy. The roads within the development will also be unadopted, so will not be gritted in winter causing concerns for safety of pedestrians.
- ix. The developer is proposing that to counter the 1:10 gradient that lane at Adderley Place/FP50 could be used as access for pedestrians and cyclists due to its lesser gradient. Adderley Place is maintained by the current residents of Adderley Place to allow sufficient vehicular access. Long spells of wet weather, as seen over recent years causes the surface to degrade rapidly, often faster than regular maintenance can keep up with. Because of this and the nature of the rough surface of the lane it is often potholed and would be inaccessible by wheelchair users, and a struggle with a pushchair. The lane is also unlit, during the winter months this makes it an unviable main pedestrian entrance to the site due to it being dark, with uneven ground, and multiple potholes. Therefore, the development lacks adequate, inclusive access for all residents.

2. Not wanted or needed by local community

- i. Over 400 objections from the local community including local councillors.
- ii. Over 800 signatures on a petition objecting to the build
- iii. Unanimous objection to the development plan by the Local Planning Committee
- iv. No affordable housing will be included in the development despite Glossop residents are in desperate need for affordable housing.
- v. Criteria for inclusion in the LAP was for 30% affordable housing for Glossop residents. The Wain Homes plan does not include affordable housing many of the new residents on this development will come from outside of the area into an area already struggling to meet the needs of current residents in terms of doctors' appointments, if you can get an appointment within 3 weeks you're lucky and getting an NHS dental appointment is impossible, I've been trying since I moved to Glossop 16 years ago.
- vi. The council has a duty to develop affordable homes, enabling young people to remain in their communities and to offer downsizing options to others. It should not be the responsibility of the council or our community to help bail out a developer who has failed to effectively assess the site or has paid too much money for an option on this site.

3. A site of high biodiversity that will be lost

- i. the site has been identified by DWT as having natural habitats of very high importance.
- ii. There are concerns raised about the extent of loss of woodland and very rare fauna and flora.
- iii. The developer has suggested a plan to translocate this habitat to a location in Chinley, however, DWT has confirmed that the site in Chinley is lower value and not suitable to translocate the species found on the land at Adderley including species of invertebrates that are on the UK BAP list.
- iv. The development will be in negative Biodiversity Net Gain.
- v. There have been invertebrates and grasses that have been found on the fields that require very specific and unique conditions to live and thrive. To move habitats of this nature to a lower value site without the specific habitat required will mean the loss of such flora and fauna. See also point 5. This move relies on the S106 payment to be paid to make this happen.
- vi. The council put in place a 2 for 1 policy for tree planting. However, for this development they are waiving this with an S106 contribution. This could set the standard for future developments in the High Peak, which I believe goes against the governments Tree Planting Targets and is a disaster for the towns ever increasing carbon footprint and all of which undermines HPBC credibility in tackling the climate emergency.

4. FP50 that runs through the middle of the development and is main right of access for existing residents of Adderley Place will become a rat-run for new residents

- i. The access for existing residents and FP50 cannot be blocked without a diversion order.
- ii. PRoW have stated that the footpath will not be safe for pedestrians if it is also regularly used by the residents of the new development.
- iii. The new proposal by Wain Homes of how they will make FP50 "undesirable" to traffic from the new developments does not include how they will build it without blocking access to the residents at Adderley Place who have a right of access along this path.
- iv. Concerns for safety of the footpath users, the degradation and maintenance of the footpath (currently carried out regularly by existing residents) and the safety of users of Simmondley Lane with higher levels of traffic exiting the lane and safety concerns for pedestrians from not only this but also from potential new residents of the recently approved development by Mellor Homes at the site of the old Zion Church who will be exiting their properties directly onto FP50.

5. Developer Wainhomes has a reputation for not paying S106 payments and has been in dispute with HPBC on other developments

- i. In 2021 in a development in Chinley Wainhomes stopped half way through a development to change the approved development plan <https://www.robertlorgan.co.uk/news/high-peak-mp-visits-residents-affected-flooding-chinley>
- ii. WH also have a reputation for 'running out of money' and not being able to pay S106 of which there are many on this build.

- iii. Their reputation for creating sub-standard properties is so bad to the extent that there are several groups on Facebook set up for 'victims' of Wainhomes <https://www.facebook.com/groups/1011690149012295> with over 1500 members! This does not seem to follow the HPBC Code of Conduct for looking after local residents, and potentially could mean many houses left empty and unsaleable.

6. Tree Preservation Order

- i. In February a TPO was put on the land within the development. The catalyst to this order, was from discovering surveyors on site in early February, at the request of Wain Homes, to assess the area for tree removal before the bird nesting season began in March 2024. It goes without saying that had this tree removal been carried out in February, this would remove one of the S106 payment and objection criteria from the appeal.
- ii. I wholeheartedly support the TPO, recognizing the invaluable contribution that the trees make to the local environment. My primary concern is the potential threat to these trees posed by a large housing development, which could adversely impact local biodiversity, place undue pressure on adjacent woodland, and fundamentally alter the character of one of the main routes into Glossop.
- iii. The sensory impact of the trees is substantial, with their density mitigating noise from the nearby A57, particularly noticeable during the summer when foliage is abundant. This contributes to a tranquil and peaceful walking environment, promoting well-being and overall health for local residents and users of FP50 that divides the TPO area. The visual contribution of the trees to the landscape further maintains the area's character, creating a rural atmosphere in close proximity to a bustling road and town.
- iv. The trees in the TPO create a vital habitat and cover for local wildlife. Users of FP50 often spot a breeding deer family in this area, utilizing the trees for cover during their movements. Beyond the deer, nocturnal badgers, buzzards (we counted 7 last weekend), owls, and during the summer months swallows, pheasants, and bats contribute to the area's biodiversity. These trees, constituting an essential ecosystem, allow wildlife to coexist with our properties, the main road, and a popular footpath. Preserving these trees is crucial to maintaining the link between adjacent green belt areas and the land at Dinting Vale and Platts Wood, enhancing benefits for wildlife. Failure to protect them may lead to habitat fragmentation due to potential large-scale housing development, risking the loss of local wildlife and lesser-seen flora and fauna.
- v. Considering the current waterlogged conditions in the southern part of the TPO, the trees to the north play a crucial role in water management. As I personally walk the saturated land daily, I am acutely aware of the potential consequences of disrupting this delicate balance, particularly considering the increasing frequency of wetter winters. The trees' contribution to water management is indispensable, and their absence could exacerbate drainage issues along the A57, potentially impacting residences and the school in the vicinity.
- vi. Given the commitment of HPBC to prioritize climate change and address concerns related to flooding, loss of natural environments, and biodiversity, the preservation of the TPO area aligns seamlessly with these objectives. Mature trees within the TPO sequester substantial carbon, enhance air quality, and contribute to HPBC's goal of carbon neutrality by 2030. With the A57 at Dinting Vale already under scrutiny for poor air quality, protecting these trees becomes a critical measure in improving and sustaining local air quality.

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