

From: planningcomments@highpeak.gov.uk
To: [Planning Comments \(HPBC\)](#)
Subject: Comment Received from Public Access
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Application Reference No. : HPK/2024/0154
Site Address: Land Off Cottage Lane Gamesley Glossop Derbyshire
Comments by: Andy Williams
From:

Cottage Lane
Gamesley
Glossop

Phone:

Email:

Submission: Objection

Comments: This objection letter is written by Planning voice on behalf of Andy Williams with reference to Land Off Cottage Lane, Gamesley, Glossop, Derbyshire (the Site) subject of planning application reference HPK/2024/0154 for 51 dwellings, comprising one bedroom flats and two and three bedroom houses. (The Proposal).

The Site is located to the east of Cottage Lane within a parcel of open land, currently a woodland and designated as countryside.

We have listed separate reasons for objection to the Application under appropriate headings.

The main considerations for this objection letter are:

- Development Principle
- Transport and Accessibility
- Biodiversity and Ecological Impact
- Visual and Landscape Impact
- Environmental Impact
- Community Infrastructure Impact

Development Principle

Policy context

Policy H 1 Location of Housing Development of the High Peak Local Plan states that the development management policies aim to promote the effective reuse of land by encouraging housing development including redevelopment, infill, conversion of existing dwellings and the change of use of existing buildings to housing, on all sites suitable for that purpose. The Council will support housing development on unallocated sites within defined built up area boundaries of the towns and larger villages.

Policy EQ 3 Rural Development states that outside the settlement boundaries and sites allocated for development as defined on the Policies Map, including the Green Belt, the Council will seek to ensure that new development is strictly controlled in order to protect the landscape's intrinsic character and distinctiveness,

including the character, appearance and integrity of the historic and cultural environment and the setting of the Peak District National Park whilst also facilitating sustainable rural community needs, tourism and economic development. The Policy allows for affordable housing developments in accordance with Local Plan Policy H5.

Policy H 5 Rural Exception Sites states that in exceptional circumstances, proposals for affordable housing on rural sites that would not normally be released for housing development will be supported provided that:

• The development is of a size and type which can be justified by evidence of need from a local housing needs survey

• The affordable housing would meet a genuine local need as defined in the Affordable Housing Supplementary Planning Document

• Appropriate safeguards are put in place that ensure that the housing will remain affordable for successive occupiers in perpetuity

• The site is located within or adjoining the settlement boundary of a village and is adequately served by existing services and facilities

• The development takes full account of environmental considerations, including European sites

• The development provides all affordable housing unless it can be demonstrated that an element of market housing is required to deliver a significant amount of affordable housing

Policy S 5 Glossopdale Sub-area Strategy states that the Council will seek to promote the sustainable growth of Glossopdale whilst promoting and maintaining the distinct identity of its settlements, provide an increasing range of employment opportunities, promote the growth of a sustainable tourist economy and meet the housing needs of the local community. This will be achieved by:

1. Promoting and maintaining the distinct identity of the settlements which make up Glossopdale by: Protecting and enhancing sites designated for environmental value, including Manor Park, Howard Park and Bankswood Park, public open spaces, playing fields and outdoor sports facilities, local and European wildlife sites, recreation areas and allotments.

Assessment

Policy H1 Location of Housing Development in the High Peak Local Plan supports housing development primarily through the reuse of land, redevelopment, infill, and change of use within defined built-up area boundaries of towns and larger villages. The proposed site, however, is located in a countryside area not previously developed, conflicting with the emphasis on urban and village infill and reuse of land.

Policy EQ 2 Landscape Character and Policy EQ3: Rural Development aim to protect the intrinsic beauty and character of the countryside. The proposed development does not align with these policies as it significantly impacts the landscape character. Furthermore, the proposed site is outside the defined settlement boundaries and does not meet the criteria for acceptable rural development under Policy EQ3. The area is not previously developed land, and the development does not align with the requirements for protecting the landscape's intrinsic character and distinctiveness.

Policy H 5 Rural Exception Sites states that in exceptional circumstances, proposals for affordable housing on rural sites that would not normally be released for housing development will be supported provided that the development is of a size and type which can be justified by evidence of need from a local housing needs survey, however such a survey has not been submitted with the application. The Affordable Housing Statement submitted with the application only refers to information available in the Local Plan as an explanation for the development. A justification for the need, size and type of development proposed has not been provided (particularly important given the recently approved Crowberries site on Glossop Road which contains affordable housing provision) and therefore the proposal does not satisfy the conditions in Policy H5.

Transport and Accessibility

Policy Context

Paragraph 135 of the NPPF 2023 states that planning policies and decisions should ensure that developments should support transport networks.

Paragraph 110 of the NPPF states that planning policies should d) provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking.

Policy CF 6 Accessibility and Transport states that the Council will seek to ensure that development can be safely accessed in a sustainable manner. Proposals should minimise the need to travel, particularly by unsustainable modes of transport and help deliver the priorities of the Derbyshire Local Transport Plan. Decisions should ensure that development does not lead to an increase in on street parking to the detriment of the free and safe flow of traffic. Applicants will be required to submit details of parking which includes the proposed parking provision based on an assessment of the parking needs of the development and the impact on the surrounding road network.

Assessment

Cottage Lane is currently heavily congested, with traffic often reduced to a single lane due to parked cars. The addition of 51 residential units will exacerbate this problem, leading to longer travel times and increased air pollution. The existing infrastructure, including roads and public transport, is insufficient to support the additional load.

Furthermore, the area lacks sufficient public transport options, with no train station in Gamesley and limited bus services present in the vicinity; only two services; nos 341 and 394 run from the nearby bus stop and the regular provision is well below the information suggested on the Transport Assessment, with an average of one service per hour in each direction. This inadequacy forces residents to rely on cars, further contributing to traffic congestion and environmental pollution.

Given this limited provision of public transport, the applicant's statement 'It is proposed to provide a total of 84-parking spaces, equating to 97% of the 87-spaces provision required by the parking standards. Given the highly accessible location of the site by foot, cycle, and public transport, the proposed parking provision is considered appropriate,' should be challenged. Furthermore, the Council's cycle parking requirements require 51 cycle spaces to be provided, however the Transport Statement & Site Layout Plan doesn't explain or show how this will be met, which is especially important given the absence of garages in the development.

The lack of sufficient parking within the site will only serve to worsen the traffic within nearby roads. The proposal is therefore not in accordance with Policy CF 6 of the Local Plan.

Biodiversity and Ecology Impact

Policy Context

Paragraph 136 of the NPPF states that trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined.

Paragraph 186 of the NPPF states that when determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.

Policy EQ 5 Biodiversity of the High Peak Local Plan states that the biodiversity and geological resources of the Plan Area and its surroundings will be conserved and where possible enhanced.

Policy EQ 9 Trees, Woodlands and Hedgerows aims to protect the landscape and natural environment from adverse impacts of development.

Assessment

The site predominantly comprises broadleaved woodland, which is listed as a Biodiversity Action Plan (BAP) Priority Habitat. This habitat supports a range of fauna, including nesting birds, roosting bats, hedgehogs, and common amphibians. The proposed development will result in the loss of this valuable habitat, leading to a significant reduction in biodiversity and negatively affecting local wildlife populations.

The site is home to several protected species, including:

• Bats: The scattered trees and woodland on and adjacent to the site provide potential foraging and commuting routes for bats. The loss of these trees will disrupt these routes, adversely affecting the bat population.

• Birds: The woodland, hedgerows, and scattered trees provide nesting sites for various bird species. The removal of these habitats during the breeding season (March to September) could result in the destruction of nests and a decline in bird populations.

• Hedgehogs: The site provides habitat for hedgehogs, a species in decline in the UK. The proposed development would destroy these habitats, further endangering the local hedgehog population.

The site is located within 1 km of eight Local Wildlife Sites, including Dinting Nature Reserve and Dinting Wood, which are ancient semi-natural woodlands. The development will likely have indirect adverse effects on these sites through habitat fragmentation and increased human activity, which could disturb local wildlife and degrade the quality of these habitats.

The site survey identified a total of 69 individual trees, two groups of trees, three hedges and one woodland on and adjacent the site. Section 4.3.1 of the Preliminary Ecological Appraisal Report states that it is recommended that, where possible, the scattered trees, hedgerows and broadleaved woodland, which is identified as BAP Priority Habitat, are retained and protected throughout development. It adds that if the hedgerow is to be removed, it should be replaced as soon as practicable using lengths of more valuable hedgerow. Any compensation hedgerow planting should equate to a minimum of 1.5 times the length of that to be lost.

The Arboricultural Impact Assessment indicates (and it is clear from the proposed site plan) that several high-value trees will need to be removed to accommodate the development. These trees are crucial for maintaining local biodiversity, providing habitats for various species, and contributing to the ecological integrity of the area. In addition, the existing sections of hedgerow have also been removed, which does not adhere to the recommendations in the Ecological Appraisal nor reflects the aims and objectives of Policies EQ2 and EQ9.

The ecological appraisal recommends several mitigation measures, however it remains unclear how these will fully compensate for the loss of habitat and the displacement of wildlife, particularly given the scale of the proposed development. The proposed site plan makes little provision for replacement tree and hedgerow planting, which together with the high proportion of hard landscape treatment proposed (access road, parking drives) will result in a development which doesn't reflect its semi-rural location.

For the reasons outlined above it is considered that the development is not in accordance with Policy EQ 5 and Policy EQ 9 of the High Peak Local Plan.

Visual and Landscape Impact

Policy Context

Paragraph 135 of the NPPF states that planning policies and decisions should ensure that developments: c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).

Paragraph 180 of the NPPF states that planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services; including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland

Policy EQ 2 Landscape Character states that the Council will seek to protect, enhance and restore the landscape character of the Plan Area for its own intrinsic beauty and for its benefit to the economic, environmental and social well-being of the Plan Area.

Policy EQ 6 Design and Place Making states that all development should be well designed and of a high quality that responds positively to both its environment and the challenge of climate change, whilst also contributing to local distinctiveness and sense of place.

Assessment

Policy EQ6 Design and Place Making ensures that new developments respect the character and appearance of the area. However, in addition to the above concerns, the development will result in the loss of existing green open space and landscape elements which play an important role in the preservation of the existing setting, leading to a significant loss of landscape character and a detrimental visual impact.

It should also be noted that the surrounding residents have chosen this area for its scenic beauty and available green spaces. The proposed development will significantly alter this landscape, reducing the open space available and diminishing the quality of life for current residents as a result.

Environmental Impact

Policy Context

Building Regulations, Part L - Conservation of Fuel and Power sets the compliance standards for energy demand and carbon dioxide emissions from buildings. Guidance on how to meet the requirements of this regulation is provided within a number of approved documents that relate to new build as follows:

The predicted rate of carbon dioxide emissions from the dwelling (the Dwellings Emission Rate (DER)) should not be greater than the Target Emissions Rate (TER). Additionally, the Dwelling Fabric Energy Efficiency (DFEE) should not be not greater than the Target Fabric Energy Efficiency (TFEE).

Assessment

Neither the Dwellings Emission Rate (DER) or the Target Emissions Rate (TER) is listed and it is therefore not possible to assess if the Dwellings Emission Rate (DER) is greater than the Target Emissions Rate (TER), as required by Part L compliance standards. This omission means the current submission does not meet the required reporting. The conclusion states; the approach to the dwelling emission rate reduction have also been reviewed; but no values are provided and HPBC would not be able to judge if this development meets the needed standards and regulations, ensuring a low carbon future for home occupiers.

Page 20 of the Energy and Sustainability Statement states: ;Build Fabric and Thermal Performance An enhanced building fabric specification (beyond the regulatory compliance standard) will achieve compliance with the Council;s planning policies and Building Regulations criteria.; However the U values listed for example 0.18 W/m2K for walls are not beyond the Part L regulation minimums and do not provide the expected

levels to meet the high carbon future plan set out in Policy EQ 1 (High Peak). The conclusion of the document makes the claim "The dwellings will improve upon the fabric energy efficiency standards set out in Building Regulation Part L1A (2021 with 2023 Amendments)". However, it does not provide any evidence to support the implementation and measures to be included to achieve these results.

The Energy and Sustainability Statement states that "In accordance with the Local Plan Policy EQ 1 and Policy EQ 6, materials will be responsibly sourced. Materials with low environmental impact will be selected and local suppliers prioritised. This procurement strategy will minimise and conserve energy associated with transportation and waste generation." However, no detail has been provided on how responsibly sourced is defined and whether whole life carbon of material choices will be considered.

Page 8 of the Energy and Sustainability Statement states "The proposed development site currently comprises a light industrial building, which includes a workshop and associated buildings and hardstanding areas (see Figure 3.1)." However, this is incorrect; no workshop is present currently on site. Also figure 3.1 is not labelled in the document.

Community Infrastructure Impact

Policy Context

The NPPF states in paragraph 135 that planning policies and decisions should ensure that developments support local facilities and transport networks.

Policy S5 Glossopdale Sub-area Strategy seeks to maintain the distinct identity of settlements and meet the housing needs of the local community while protecting and enhancing sites designated for environmental value.

Assessment

Anecdotal evidence suggests that local schools and doctors surgeries are already oversubscribed, and the proposed development will add to the strain on educational facilities, making it difficult for new and existing residents to access quality education. The increase in population density will also impact emergency services. The current traffic conditions hinder the swift movement of emergency vehicles, and further congestion will exacerbate this issue, potentially jeopardising public safety.

Conclusion

The proposal is not acceptable in principle and results in detrimental impacts upon transport and accessibility, environmental and ecological assets, visual and landscape character and community infrastructure. The proposals are contrary to Local Plan Policy as well as the Policies in the NPPF.

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