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Ask for: Adrian Martin
Email: HPBC/2024/009072
Our ref: HPK/2023/0192
Your ref:
Date: 27 August 2024

Dear Rachel Simpkin

**TOWN AND COUNTRY PLANNING ACT 1990
(DEVELOPMENT MANAGEMENT PROCEDURE) (ENGLAND) ORDER 2015
ARTICLE 18 CONSULTATION WITH HIGHWAY AUTHORITY**

PROPOSAL: Construction of 99 dwellings with associated landscaping and engineering works

LOCATION: Land at Hogshaw
Fairfield
Buxton

APPLICANT: Barrett Homes

Following the initial local highway authority comments made to the application, in particular to the transport assessment submitted in support of the application, the TA has now been updated and resubmitted.

Section 3.19 states that the main access road/road 1 is to be constructed to a gradient of 1 in 10 and that all other roads are to be at 1 in 12 with no explanation given of any site constraints or justification of why such gradients are proposed.

National guidance provided in DfT document 'Inclusive Mobility' recommends an absolute maximum gradient of 1 in 12 and for 'landings' to be provided at regular intervals. The submitted plans indicate no landings adjacent to any of the roads within the development.

HPBC's Local Plan Policy CF6 states "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.”

DCC’s own highway design guide, DSP, recommends that carriageways and footways are constructed to a gradient of 1 in 20 (5%) but that LHAs to be consulted on site specific allowances. In addition Manual for Streets 2 recommends the same gradients for footways but that 1 in 12.5 (8%) to be considered the maximum. For carriageways MfS2 recommends a maximum gradient of 1 in 16 (6%) but 1 in 12.5 (8%) should be considered the maximum.

Clearly, there is no guidance which recommends roads or footways should be constructed to a gradient of 1 in 10.

It is therefore considered that the proposed gradients do not comply with national guidance or HPBC’s Local Plan and as such the application will not provide a development which will be safely accessed in a sustainable manner or minimise the need to travel by unsustainable modes. It is considered that the application is not acceptable to the Local Highway Authority on this issue alone.

The TA comments that longitudinal sections will be provided at the S38 detailed design stage. It would have been useful for longitudinal sections to be provided in the TA to understand why the roads cannot be constructed to a lesser gradient. If the applicant wishes to provide meaningful evidence to justify why the proposed roads exceed recommended guidance or to revise the gradients, the Highway Authority will assess any such evidence or information provided. Without any such justification being presented, the Highway Authority is likely to raise an objection to the application.

The TA reiterates that the nearest bus stop is within 300m of the site access. The site does have existing pedestrian accesses via a number of public footpaths to the south of the site; however, it is not clear if these are intended to mean ‘site access’ or if the site access is via the roundabout on the A6. Regardless, distances to bus stops should be measured from individual residential units and not the boundary of the site. Clearly there are a large number, if not most, residential properties which will be located significantly further away from the nearest bus stop than the industry recognised maximum distance of 400m.

Regarding the public footpaths, there has been no assessment of their suitability for all users, only that “Further design details such a surfacing materials, signage and illumination are to be agreed with DCC during the detailed design stage, however it is confirmed that these will be provided in accordance with DCC’s comments.” These details are required at this stage of the application process and not at ‘detailed design stage’ (it is assumed that detailed design stage is meant to mean S38 road adoption stage) to provide a full understanding of the suitability of the available pedestrian infrastructure in relation to the site to provide access for all users to local amenities in

Buxton and for future occupiers to access public transport facilities. Should improvements be identified and required to surface treatments, lighting etc. they need to be identified now and conditioned accordingly.

The TA dismisses the need to provide a WCHAR, JAT and CLoS as they relate to other design legislation; however, whilst, this is not disputed technically, they are a useful template to use to assess the accessibility and usability of pedestrian and cycle routes linking the site to the highway network and local facilities including schools. An assessment of distances to local amenities is included in the TA; however, this is purely based on an isochrone plan and not quality of route(s). Some form of assessment of pedestrian and cycle routes is expected for the reasons explained in earlier comments.

Regarding the proposed internal layout, there are a number of issues which will also require addressing:

The issue around the proposed gradients of the internal carriageways and footways is addressed in earlier comments but the applicant should be aware that should planning consent be granted for the application, DCC will not accept the submitted layout for adoption if the gradients are to remain as 1 in 10 and 1 in 12.

Other issues are listed as follows:

- No verges/margins are indicated, with footways only on one side.
- No trees are indicated as per the requirements in paragraph 136 of the NPPF
- No footways around turning heads also with no margins
- Road 1 and north/south roads exceed the maximum straight length and will require speed reducing features or realigning
- Block paving on bends/turns is not accepted due to future maintenance issues
- No swept path analysis is provided

Policy DS 17 of HPBC's Local Plan requires emergency access via Nunsfield Road and Glenmoor Road; the submitted plans only retain existing pedestrian access between these routes and the development site. Therefore, the submitted application is not in compliance with HPBC's Local Plan.

Some of the issues listed above are iterations of those made in the initial Highway Authority comments, which are included in the TA and do not appear to have been addressed in the submitted layout.

As submitted, the development proposal does not comply with policies CF6 and DS17 of HPBC's Local Plan.

Yours Sincerely

Highways Development Control