

High Peak Borough Council
P.O. Box 136
Buxton
High Peak
SK17 1AQ

Mr K D Greenway
Frith Lee
Crossings Road
Chapel-en-le-Frith
SK23 9RY

20th January 2026

Dear Sir/Madam

Re. Consultation on Outline Planning Application

Application Number: HPK/2025/0447

Applicant's Name: BDW Trading Ltd (Barratts)

Location: Land at Crossings Road, Chapel-en-le-Frith, Derbyshire

21 JAN 2026

General Comments on Application: **OBJECTION**

I have submitted 2 letters with objections to High Peak Borough Council dated 9th and 18th December 2025 and would like to make additional comments, with particular reference to the Landscape and Visual Impact Assessment Report (LVIA) for Barratt Homes (Manchester) by Tyler Grange (TG). This report appears to have been added to HPBC Planning Portal Attachments on 28/11/25, significantly later than the 27 such attachments dated 19/11/25 which initiated the review and after at least 42 people had already submitted their objections. A further 8 attachments by Barratts were also added on 28/11/25. It is therefore questionable to what extent people have been fully able to review the proposal's documentation effectively. In addition, even people responding later than 28/11/25 may not have noticed the additions, hidden amongst the many objections by residents. The process used by Barratts may also be considered questionable as the Statement of Community Involvement outlines. The 'consultation and engagement activities at pre-application stage' was replied to by many residents with generally negative responses. I wonder how many people who responded to this 'Involvement' considered they had objected to the development and have not done so further at this stage?

I have lived on Crossings Road for 10 years and as a keen walker have walked almost all of the local footpaths within this time, certainly most within a radius of 5km of my house. I have walked extensively throughout the hilly areas of England, Scotland, Wales and Ireland so feel I have both an appreciation and love for the beauty and importance of views within a landscape. I recognise the joy and benefit that can be experienced by young and old alike when observing landscapes. We are fortunate to live in an area blessed with outstanding natural beauty and it is my view that the vista down the Chapel/Combs/Whaley Bridge valley from Crossings Road between the dwellings of Nearwell and Frith Lee ranks highly in this. The combination of pastoral lowland sheep farming with the surrounding hills of Castle Naze, Combs Moss, Ladder Hill and Eccles Pike is unique. It is particularly important for the many families and groups who walk up and down Crossings Road especially at weekends and during holidays. The footpath is used as access to several of the other great footpaths in the area and is a good introduction to the joys to come. For some of the younger and more infirm older ones, without the stamina to explore the wider landscape, these views may represent the height of their ambition and enjoyment (in springtime with lambs in the fields it is particularly satisfying). The importance of these views cannot be over-stated. The construction of the proposed development would mean they would be lost for ever. I do not believe that Tyler Grange have appreciated their importance to the local community. The Crossings Road footpath is not generally used by people doing routine activities like going shopping or to the bus stop but by

those seeking pleasure accessing the countryside and local public footpaths so should be considered as such. It is probably the primary access route for Eccles Pike, particularly from Chapel-en-le-Frith rail station, the signs on the station advertising 'for Eccles Pike and Combs Reservoir' and featuring a picture of the Eccles Pike Topograph.

Comments on TYLER GRANGE – LANDSCAPE VISUAL IMPACT ASSESSMENT Quotes from the LVIA are shown in *italics*.

Within TG's report significant attention is paid to the views of the development from public footpaths. As stated above we are very fortunate to have a great selection of enjoyable and beautiful footpaths through our wonderful countryside. The weight of importance attached to these paths appears to be greater than the footpath alongside Crossings Road. I consider this to be an error in that the Crossings Road footpath is used by many people (including families) to access the same Public Footpaths and contributes similarly to the countryside experience, as stated above.

2.3 of the TG report states that the assessment has aimed to be both objective and systematic. I do not believe that either of these aims have been realised, as demonstrated by the choice of viewpoint locations to be considered and choice of views to include in the report. Several of the report's viewpoints appear to have been chosen more for ease of access by vehicle than being truly representative of views of the Site. There are examples of points which have been chosen where footpaths intersect with roads but if one were to walk along the footpath a relatively short distance a more dominant view of the Site would be obtained. However, the accuracy of the positions shown on the Plan of locations is questionable. I will explain my views in the following notes.

2.8 reports that a 2km study area was chosen and agreed by HPBC. I believe this was agreed with a consultant for HPBC (Stuart Ryder of Ryder Landscape Consultants). It would be interesting to review what Stuart Ryder made of the submitted report.

2.9 states that '*landscape effects would not extend beyond the study area due to the Site's settlement fringe context and the scale and changes associated with the implementation of the proposed development*'. This clearly does not take into account the presence of the Castle Naze/Combs Moss plateau to the south, which is both outside the 2km study area and from which 100% of the Site is clearly visible. The Iron Age hillfort of Castle Naze (Peak District National Park Access Land) is only approximately 100m outside the study area approximately 150m uphill (and clearly visible from) from Photoviewpoint 19.



The view from Castle Naze with the Site highlighted...

3.2 Whilst the proposed development site may not of itself fit the requirements of 3.2 (although I would query the omission of scenic quality and distinctiveness) Castle Naze does satisfy many of the requirements and the view of the Site from there would be seriously affected adversely as shown above.

4.23 Whilst all design items except access to the Site have been reserved for consideration at a future date, it is difficult to see at this stage how the current design satisfies bullet points 2, 3 or 4.

- *Requiring that development on the edge of settlement is of high quality design that protects, enhances and / or restores landscape character, particularly in relation to the setting and character of the Peak District National Park.*
- *Requiring that development contributes positively to an area's character, history and identity in terms of scale, height, density, layout, appearance, materials, and the relationship to adjacent buildings and landscape features*
- *Requiring that development achieves a satisfactory relationship to adjacent development and does not cause unacceptable effects by reason of visual intrusion, overlooking, shadowing, overbearing effect, noise, light pollution or other adverse impacts on local character and amenity*

4.36*The character of the Site itself is very much influenced by the enclosing residential context, it is not protected by a specific landscape designation, and is different in terms of quality, physical appearance and sense of place than the wider rolling farmland of the Peak District National Park fringes beyond the settlement edge. The Site is not enclosed by a residential context (approximately one third of the Site's perimeter is onto farmland) and is not different in terms of quality, physical appearance and sense of place to the farmland to the west.*

6.15 *This LVIA has focused upon the analysis of views from publicly accessible locations. Views from private residential dwellings are not protected by national or local planning policy. Opposite Viewpoint 2 on Crossings Road is Welby Croft Care Home. The view from here would be seriously compromised by the development of the Site. There are no Existing, Year 1 and Year 15 views included in the report for Viewpoint 2. It is doubtful that the anticipated 15 Year 'mitigation/softening' would be relevant for many of the residents of Welby Croft.*

6.17 This section states all the Public Footpath viewpoints that have been considered. It is unclear why Photoviewpoint 19 has been chosen in preference to Castle Naze (approximately 150m further south) where there is Access Land and a well used footpath which circumnavigates the Combs Moss plateau. The Site is certainly less dominant from Photoviewpoint 19 (see photo above and compare with Photoviewpoint 19 in LVIA Part 4).

7.2 The generated views for Years 1 and 15 demonstrate (especially for more distant viewpoints e.g. Viewpoint 18, Eccles Pike) how ineffective the planting is at mitigating the presence of the development. This is clearly demonstrated now by viewing the existing Barratt development of Octavia Gardens from either Eccles Pike or Castle Naze. The estate has been present for approximately 10 years and yet there is little evidence of mitigation as the trees etc are of too small a scale and too few in number to be visible. This is also apparent in the Year 15 representations of the proposed development

*Visual Receptors ****

High Sensitivity: – *Pedestrians at Eccles Pike to the far south west of the Site (Photoviewpoint 18);* It should be borne in mind that only about 30% of the Site is visible from here due to intervening topography. The omission of Castle Naze as an appropriate viewpoint is again apparent.

Medium / High Sensitivity: – *Footpath users on Chapel en le Frith FP 135 (Photoviewpoint 4),... PV7, PV8, PV9 PV10, PV11, PV19, PV14, PV15, PV17, PV18, PV12 and PV16*
Some of these locations are spurious as the Site is not visible at all (e.g. PV7 and PV17) and would therefore have Zero Sensitivity to the development.

Medium/Low Sensitivity: – *Pedestrians and motorists on Crossings Road (Photoviewpoints 1 and 2) beyond the eastern Site boundary; – Pedestrians and motorists on Eccles Road (Photoviewpoint 1) beyond the northern Site boundary; and – Pedestrians and motorists on Heath Lane / Orchid Drive (Photoviewpoint 3) beyond the eastern Site boundary.*

In view of the High and Medium Sensitivity decisions above how can pedestrians at any of these locations not be High Sensitivity, especially those on Crossings Road? The fact that motorists and pedestrians have been combined to arrive at the above assessment demonstrates either a lack of understanding of the type of pedestrian use of the footpath or something more cynical. Residents of Welby Croft Care Home are not mentioned.

9.4*Appendix 7 to illustrate the proposed parameters and landscape strategy in context from viewpoints 1, 4, 11 and 18 to inform the assessment.* The choice of these 4 locations is not representative of the Site and its effect on the landscape. PV1 and PV4 are virtually interchangeable as both show the northern area of the development (which does not contain any houses) with almost identical glimpses of houses between the gardens of Frith Lee and Pyke House. PV11 is sufficiently low that the full extent of the development is not appreciated. However PV11 Year 15 does demonstrate the ineffectiveness of mitigation measures at a distance. Similar comments to PV11 apply to PV18 as not all the Site is visible. 2 locations that would have been more representative are PV2 (to include Welby Croft Care Home receptors) and Castle Naze.

9.7 Table 9.2. Here again the Table underestimates the visual effects for pedestrians on Crossings Road and does not consider Welby Croft Care Home. The 'Sensitivity of Receptor' is considered 'Medium - Low'. Whilst this may be appropriate for occupants of vehicles (probably travelling at 30mph on their way to somewhere) it is hardly appropriate for a pedestrian enjoying a sedate walk in the countryside. Similarly the 'Magnitude of Change' and 'Level of Effect' for pedestrians is seriously underestimated.

9.8 *This LVIA has focussed upon the analysis of views from publicly accessible locations.* This is true for some publicly accessible locations but the obvious omissions would suggest careful selection. Table 9.3. For some of the locations included in this Table the change between Year 1 and Year 15 is demonstrably nonsense. The most extreme example is Frith Lee, a bungalow with south and west facing windows facing onto the rear of new 2.5 storey high dwellings to the south within a few metres. If the magnitude of change is Major at Year 1 it will be Major at Year 15 as there is no guaranteed mitigation considered for rear gardens.

10. Conclusions.

I do not accept that TG's conclusions set out in Section 10 are entirely justified and objective. They appear to be the result of a carefully selected set of parameters in terms of the study area and choice of photo locations, Year 1 and Year 15 representations and omissions. There seems to be a lack of understanding of the use of the landscape and its visual importance in terms of scenic quality and distinctiveness for the existing residents of Chapel-en-le-Frith.

On considering the Tables included in 9.7 and 9.8 comparing the Completion and Semi-maturation effects on various receptors, it is not the mitigation efforts of the Developer that reduce the effects but the passing of time and the fading of memory that seem to be the biggest factor. This can surely not be a serious and sustainable method of justifying such building projects.

In the latter sections of the report (Landscape and Visual Assessment Parts 3 and 4 as downloaded from HPBC portal) the views from VP4 through to VP20 are all poorly reproduced and difficult to appreciate the landscape and the extent of the Site (i.e. 16 out of 31 photo representations are virtually illegible). How can sensible judgements be made based on this evidence?

In view of these observations it may be valuable to obtain the professional advice of HPBC's Landscape Consultant, Stuart Ryder, on the final report, bearing in mind the above and any other relevant comments received by HPBC.

I am concerned that the process being used to justify the proposed development largely depends on the submission of reports prepared by consultants employed by Barratts. I question how these can be considered genuinely objective and impartial. I think there is enough evidence within several of the reports to suggest they have been selective of parameters more likely to justify the development than those being against. I believe the decision by HPBC to not require an Environmental Impact Assessment is wrong. It may be an idea to obtain an EIA to consider the cumulative impact of the developments in this area and ensure this is carried out by an organisation that is impartial, objective and independent of Barratts.

I urge High Peak Borough Council to reject the proposed development for its encroachment onto agricultural land and the loss of an important visual amenity.

Yours faithfully

Kim Greenway