



High Peak Borough Council

working for our community

14/04/2023

My ref: MJ/PAD/2022/0024

Your ref:

Sarah Cox
Carter Jonas
9
Bond Street
Leeds
LS1 2JZ

Dear Sir/Madam

PAD/2022/0024 - Residential development of between 10 and 110 homes at Glossopdale Community College Lower Site Talbot Road, Glossop

I refer to your pre-application enquiry relating to the above site. Having considered the proposal carefully we are now in a position to offer the following advice and comments.

A development brief has been prepared for the Glossopdale Community College site and although this was not formally adopted or published it has been shared with the County Council who have had an input into its content. It has been produced specifically to inform early discussions on this site. The pre-application documentation submitted does not reflect the content of this brief. In particular, High Peak Borough Council has undertaken extensive work on leisure provision in Glossop and has clear evidence showing that this site would be appropriate for the provision of a new leisure centre to serve the town.

In considering this pre-application proposal, there are a number of relevant policy issues to cover. These are each addressed in turn below.

Policy Background

National Planning Policy Framework (NPPF)

Para 2 NPPF 'Planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise.'

Para 11 NPPF 'Plans and decisions should apply a presumption in favour of sustainable development.....For decision-taking this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁸, granting permission unless:

- i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed⁷; or
- ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.'

⁷ The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 181) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets (and other heritage assets of archaeological interest referred to in footnote 68); and areas at risk of flooding or coastal change.

⁸ This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 74); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years.

For High Peak Borough Council, part c) of paragraph 11 applies. This is because the Council has a housing land supply of 6.28 years. Details are contained within the housing land supply position statement which reflects the position at 1 April 2022. This has been updated since the applicant's 'Vision and Capacity Study' was produced. (This document refers to the 2021 position). Also at the time of writing the Housing Delivery Test results for the Borough for the previous 3 years were 135% (published in 2022), 159% (published in 2021) and 152% (published in 2020).

High Peak Local Plan 2016 and Local Plan Review

Local Plan Review

On 23rd June 2022, the Executive agreed that High Peak Local Plan Policy S3 (Strategic Housing Development), Policy S4 (Maintaining and Enhancing an Economic Base) and Policy H4 (Affordable Housing) are deemed out of date for development management purposes, meaning that less weight will be given to them when determining planning applications.

In practice, policies S3 and S4 specify development requirements for housing and employment as well as setting general principles for both types of development. As such, aside from input into future housing land supply statements, applying less weight to these policies is unlikely to have a significant impact on the majority of applications. In relation to Policy H4, the Council has effectively already been applying less weight to this policy for some time due to conflict with the NPPF. H4 calls for affordable housing contribution on sites of 5 units or above (or 0.16ha+). In line with the latest iterations of the NPPF, contributions are now only sought for major developments. The forthcoming Developer Contributions SPD will also provide guidance on the appropriate housing mix having regard to the need for First Homes.

For the avoidance of doubt, all other policies within the High Peak Local Plan should continue to be given full weight until further notice.

Early Engagement consultation is currently underway as a first step in the Local Plan Review process. Alongside this is consultation on a fresh version of the Council's Statement of Community Involvement and the Council's new Developer Contributions SPD. The deadline for comments on all documents is 5pm on 3rd March 2023. Further information is available on the following link:
<https://www.highpeak.gov.uk/LocalPlanReview>

2016 Local Plan

The following policies, (all of which are considered to be up-to-date) are particularly relevant for this proposal:

Policy S5 Glossopdale Sub-area Strategy – Any future scheme should comply with this overarching policy. Whilst the policy is supportive of the development of new housing on sustainable sites within the built-up area boundary, of which this is one, it gives an indication of some of the issues which would need to be addressed when putting together a planning application for this site. For example, the playing field element, affordable housing, impact on the historic environment and the issue of school capacity.

Policy EQ6 Design and Place Making - The design of any future development on this site is a key consideration. Although the site is not within a Conservation Area, it is within close proximity to two Conservation Area boundaries, Norfolk Square on the east side and Howard Park Conservation Area to the north-west. Any scheme must be in line with the Council's Design and Placemaking Policy.

Policy EQ2 Landscape Character - The Council's Landscape Policy requires that development proposals are informed by and are sympathetic to the landscape character areas in the Landscape Character SPD.

Policy CF4 Open Space, Sports and Recreation Facilities - The presence of playing field land associated with the former school use is a key issue to be considered as part of any future redevelopment of the site. Any development should adhere to the requirements of this policy which resists any development that involves the loss of a sport, recreation, play facility or amenity green-space except where it can be demonstrated that alternative facilities of equal or better quality will be provided in an equally accessible location as part of the development or the loss is associated with an alternative sports provision that would deliver benefits that would clearly outweigh the loss, or an assessment has been undertaken to demonstrate the facility is surplus to requirements.

Developer contributions towards the delivery, improvement and management of off-site provision of open space and recreation facilities would be expected along with a contribution towards off-site allotment provision if growing areas for residents cannot be designed into the scheme.

Policy CF5 Provision and Retention of Local Community Services and Facilities
Schools (the current land use of the site) are included as a community facility in this

policy. In order for a change of use to be acceptable, under this policy, it would need to be demonstrated that the existing use is no longer financially or commercially viable and there are no other means of maintaining the facility. If an alternative facility of the same type is available or can be provided in an accessible location this is also an acceptable scenario for a change of use to occur. If permission is granted for a change of use or redevelopment, preference will be given to premises remaining in some form of community or employment use so long as this does not result in traffic, amenity, environmental or conservation problems. Open space would be an acceptable use for the site.

Policy H1 Location of Housing Development supports housing development on unallocated sites within defined built up area boundaries of the towns and larger villages. The Glossopdale Community College site is unallocated in the High Peak Local Plan.

Policy H3 New Housing Development requires that new housing development addresses the housing needs of local people - affordable housing, a range of housing including for those with specialist needs and to ensure that new housing is adaptable and meets appropriate space standards. Policy also asks for an appropriate mix of housing to be provided to contribute positively to the promotion of a sustainable and inclusive community taking into account the characteristics of the existing housing stock.

Policy CF6 Accessibility and Transport requires the site to contribute to sustainable development by minimising the need to travel so design of the scheme to relate to its wider surroundings and the provision of appropriate footpath and cycle linkages are important to achieve this.

Policy EQ10 Pollution Control and Unstable Land Since the Local Plan was adopted, an Air Quality Management Area (AQMA) has been designated by the Council in Glossop along the A57 so any direct or indirect impact of new development on this AQMA requires consideration as part of the planning application process. The applicant may be required to undertake an 'Air Quality Assessment', though this will depend upon the details of the scheme.

Policy CF7 Planning Obligations and Community Infrastructure Levy Potential contribution requirements include contributions towards affordable housing, education, highways and open space. The policy allows for economic viability considerations. The Council is currently preparing the Developer Contributions SPD. A draft of the document is being consulted on until 5pm on 3rd March 2023 and adoption is anticipated in late Spring 2023.

Policy H4 Affordable Housing Although the Council has said this policy is out of date, the affordable housing requirement for this scheme - 30% affordable housing with an 80% (rented) and 20% (intermediate) split – is still applicable. (It is the requirement for smaller sites which is out of date). Any variations should be justified.

Other Relevant Documents

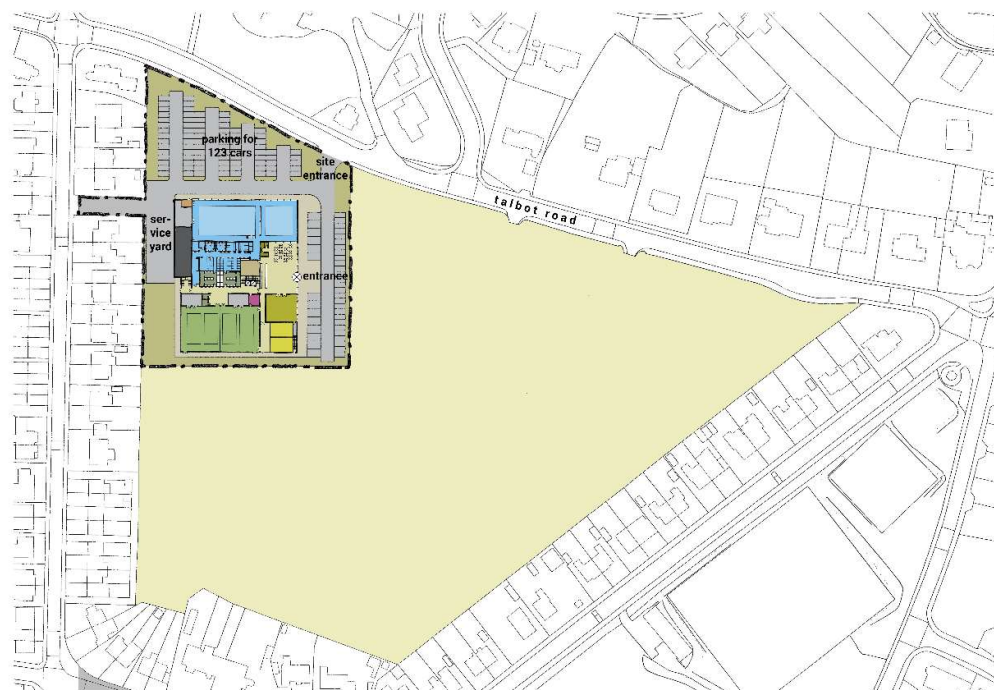
High Peak Design Guide SPD 2018 – seeks to promote high quality design and identifies the overarching principles in securing good design. It provides further detail

to the policies relating to Design and Place Making and achieving high quality development within the adopted High Peak Local Plan.

Glossop Design & Place Making Strategy SPD 2012

Glossopdale Community College Development Brief – prepared to inform the future use and development of the former Glossopdale Community College site. Highlights the Council's emerging evidence from its sport and leisure consultant identifying a need for a new, co-located 'wet and dry' leisure centre to serve Glossop. Identifies the Glossopdale Community College site as the only suitable and available site which is within a reasonable distance of the town centre and customer base which could also accommodate the size of facility required.

The diagram shown below indicates the proportion of the site which would be taken up by a leisure centre but it not intended to fix the position of the leisure centre.



P5730 Glossop Leisure Centre - Talbot Road Site Plan

pozzoni

High Peak Statement of Community Involvement

Pre-application engagement with the community is encouraged in relation to this site to add value to the process and the outcome. Further details are set out in the Council's adopted Statement of Community Involvement:

https://www.highpeak.gov.uk/media/4047/High-Peak-SCI-adopted-February-2019/pdf/High_Peak_SCI_adopted_February_2019.pdf?m=1553776998070

Key issues for Consideration prior to submitting a Planning Application

Principle of Development

In principle housing development on this site, which is within the Glossop settlement boundary and part brownfield, would be acceptable in policy terms, subject to the Local Plan policy tests, set out above being met. This section provides further details on key issues the applicant needs to consider.

The submission document is very light on detail, whilst it is accepted that this is a pre-submission document, these comments can only address the detail of what has been provided and what has been omitted.

New Leisure Centre

High Peak Borough Council is expecting part of the site to be used for a new leisure centre. As shown on the diagram above, based on land take, only around a quarter of the site would be needed for this facility so the rest of the site could be used for residential development. The position of the leisure centre on the site can be negotiated.

Loss of Playing Fields

The Council has contacted Sport England for a view on this proposal. Their full response can be viewed in Appendix B of this document. A summary of the key points is provided below:

“The proposal relates to a residential scheme grouped into development parcels around two access points into Talbot Road. The illustrative masterplan includes two LEAP areas along with open space.

The proposed development scheme would lead to the loss of the whole of the playing field land as shown in the Google Earth image (2020) below (along with an aerial shot of the site prior to the demolition of the school buildings commissioned by Derbyshire County Council). This playing field land exceeds some 2.6 hectares of land. The High Peak Playing Pitch Strategy (PPS) includes text on the pre-application site. The PPS states that the site is due to close in 2017/2018 and that whilst the site does not have any formal playing pitches it does have playing field land and an old redgra surface. The recommended actions for the site in the PPS are to ensure that any developments on the site adhere to NPPF 74 (now paragraph 99) and local planning policy.





The loss of this playing field therefore needs to be considered against the exceptions in Sport England's policy (see Appendix B) which accord with the specified justifications included in paragraph 99 of the NPPF and Development Plan Policy CF 4 which all seek to protect playing fields from development.

The PPS confirms that there is little spare capacity for existing and the growth of football in the area and that there is an identified shortfall of youth grass pitches and full size 3G pitches across the High Peak area. A shortfall in rugby union pitches is also identified. As such, the PPS does not show a surplus of playing field provision in the area to meet exception E1 of Sport England's policy exceptions or paragraph 99 a) of the NPPF.

From the information submitted with the planning enquiry there is no reference to the playing field being replaced. As such, the proposal would be contrary to exception 4 of the Sport England's Playing Fields Policy and paragraph 99 b) of the NPPF.

The housing proposal also needs to be assessed against Section 8 of the NPPF which advises that any new sports facility needs arising as a result of a development should be met and Sport England's planning objectives to protect, enhance and provide opportunities for sport.

The additional population generated by this housing proposal would create additional demand for sports facilities. The existing provision within an area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. The PPS and Facilities Planning Models undertaken in High Peak provide data on the existing facilities in the area. Sport England can assist in providing calculations on the demand likely to be generated on outdoor sports facilities and indoor sport facilities in the area as a result of this housing development.

In view of the above, the current proposal would not meet any of the exceptions in Sport England's Playing Field Policy or any of the specified justifications in Paragraph

99 of the NPPF or Policy CF4 in the High Peak Local Plan (2016). This being the case, Sport England is likely to raise an objection to this proposal at the planning application stage as the proposal would be contrary to our Planning Fields Policy and to paragraph 99 of the NPPF. The pre-application enquiry also fails to demonstrate how the additional sports needs generated by the development would be met.

In order to avoid an objection from Sport England, the following areas should be investigated: provision of a replacement playing field and accompanying the proposal with an up-to-date Sports Facilities Audit for Glossop which is informed by a robust evidence base to ensure that the sports facility needs arising as a result of the development are met either on-site and/or off-site.

It should be noted that consent under Section 77 of the Schools Standards and Framework Act does not necessarily mean subsequent planning approval will be granted. Therefore, any application for planning permission must meet the requirements of the relevant policy, in this case paragraph 99 of the NPPF, Local Plan Policy and Sport England policy”.

Prior to submission of a planning application, it is recommended that the Council's Service Commissioning section are also contacted about how you intend to resolve the loss of playing field situation and any other open space issues. It is noted that the applicant's layout plan shows a potential location for a children's play space which would be of interest to this section.

Loss of Community Facility

The former school itself is a community facility so any redevelopment of the site for an alternative use must be accompanied by evidence of suitable alternative school provision to serve the area (taking into account future housing increases).

Design

Detailed urban design work has been undertaken in connection with any future development on this site on behalf of the Council. This can be found in Appendix A and should be considered when designing the detailed scheme for submission.

Looking at the concept plan submitted by the applicant, the general layout of the green space and SUDS is similar to the urban design guidance. The requirement for at least 10% Biodiversity Net Gain is due to become mandatory later this year and this will need to be incorporated within any future application.

The site presently does little to reinforce connections with its surroundings yet it is central to the Old Town and very visible from the surrounding landscape and there are opportunities to improve these connections. Certain principles are emphasised in the Council's urban design work and an appropriate design response is required based on:

- Context within Old Glossop area.
- Use of specific character references that are strong within Glossop such as curved corner buildings, strong building lines, enclosed streets.
- Establishment of an urban grain based on a hierarchy of development.
- Landscape framework, based on increasing biodiversity and well treed gardens and streets that reflect the character of north Glossop.

- A strong frontage to Talbot Road is essential to establishing identity and character especially at gateways into any new housing area.
- An appropriate high quality responsive contemporary design that is evolved from the context may be possible. This can use ecology and sustainability to enhance the schemes development credentials.

These principles should be reflected in any future planning application.

Density

A maximum of 110 dwellings is proposed by the applicant on this 4.75ha site. This amounts to a density of just 23.2 dwellings per hectare which is very low. Glossop is surrounded by Green Belt and paragraph 141 of the NPPF states that:

“before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed throughwhether the strategy:

- a) makes as much use as possible of suitable brownfield sites and underutilised land;
- b) optimises the density of development including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport”.

This site does have a brownfield element and is well served by public transport. The Local Plan Review has started and it is important for the Council to ensure that existing sites within the built up area boundary are developed to make optimal use of the available land to ensure that the Green Belt boundary endures and reduce the likelihood that Green Belt land (or very minimal Green Belt land) is needed to meet Glossop’s future housing requirements. The Council’s urban design guidance suggests 30dph and this should be a minimum density for this site.

Housing Mix

Policy H3 requires consideration to be given to the housing mix and compliance with the Nationally Described Space Standards and accessibility standards. These should be secured through a condition and/or legal agreement as per the legal opinion sought by the Council during the determination of the Foxlow Farm Reserved Matters application which concluded that provision should be made at the Outline application stage.

In September 2022, the Council published the Housing and Economic Land Needs Assessment (HELNA) that was commissioned to inform the review of the Local Plan. The study provides an updated analysis of the housing mix required across the Borough as well as providing a more fine grained assessment of the recommended housing mix across each of the Local Plan Sub-Areas. This includes Glossopdale within which the site in question is located.

Accordingly, the HELNA is deemed to be a “successor document” to the SHMA as referenced in Policy H3 and it should therefore be taken into account when considering any planning application on the site. The recommendations from the 2022 HELNA in relation to the mix of market housing for both High Peak as a whole as well as

Glossopdale are outlined below alongside the existing housing stock in Dinting Ward (the ward in which the site sits).

Recommendations with a market adjustment are also provided. This results in a 15% reduction in the number of smaller (1-2 bed) dwellings and a commensurate increase in the number of 3 and 4 bedroom properties to reflect “the very pronounced socio-economic shock precipitated by the pandemic and the strong (and what appears to be a permanent) shift towards homeworking and the need for larger properties to accommodate this.” (HELNA, para 12.34)

The development should bring the housing stock closer to the HELNA recommendations.

	1 Bed	2 Bed	3 Bed	4 Bed or more
2014 SHMA	10%	45%	35%	10%
2022 HELNA High Peak	10%	37%	41%	12%
2022 HELNA High Peak (with market adjustment)	8%	32%	44%	16%
2022 HELNA Glossop	7%	37%	46%	10%
2022 HELNA Glossop (with market adjustment)	6%	31%	49%	13%
% of existing housing stock in Dinting Ward (2021 Census)	5%	21%	40%	34%

Table Showing Housing Mix Data

Consequently, looking at recent data from the 2021 Census showing actual percentage of housing stock in the Dinting Ward, to bring the housing stock closer to the HELNA recommendations more 1, 2 and 3 bed houses are needed.

It is noted that in the ‘vision document’ provided by the applicant (p.19) the indicative housing mix mostly falls in line with HELNA recommendations. The only conflict is the 4+ bed housing stock which is already well above HELNA recommendations in the Dinting Ward and this would be further increased by the agent’s indicative proposal. In relation to Part M4 (2) of the Buildings Regulations, the HELNA recommends that c.50% of new market housing should meet this standard.

In addition, following adoption of the High Peak Developer Contributions SPD later this year, the Council will expect to see provision for First Homes on the site so this may be a requirement depending on the timing of the planning application.

Self-Build Housing Demand

The Council has a legal duty to meet the demand for the number of entries (plots) demanded on its self-build register overall; and should also consider the geographic areas of the Borough specified by applicants.

In the case of Glossopdale. at the time of writing 11 self-build plot requests specified the Glossopdale area only, as a locational preference; a further 9x plot requests specify Glossopdale but with other locations in the Borough (out of a total Borough-wide plot demand of 81).

As demand exists, it is suggested that this is addressed by the applicant.

Accessibility and Transport

The proposed vehicular access concurs with that in the Council's urban design guidance (Appendix A), though County Highways will advise on the technical suitability.

Potential pedestrian links in and out of the site to link with the wider community and town centre are also covered in the urban design guidance. Looking at the applicant's concept plan, there are no proposals for pedestrian linkages on the southern boundary (to Spire Hollin) or the south western boundary (to North Road) or the south eastern boundary (to Fauvel Road). As explained under the accessibility heading of the guidance, this would be beneficial to encourage more pedestrian trips to the town centre and railway station which are both to the south of the site (so these pedestrian linkages to the south would make them nearer for pedestrians). Ways to achieve this should be considered when designing the detailed site layout. Also, it appears that the existing bus stop and pedestrian entrance to the site (north-eastern boundary off Talbot Road) have not been integrated into the new layout and it is considered appropriate to retain these.

Air Quality

As air quality is an issue in Glossop, it is recommended that consultation takes place with the Environmental Health section regarding potential offsetting techniques to mitigate any adverse impacts of any development on air quality.

It is noted that the applicant suggests electric vehicle charging points and a car club on site which is encouraging. Further discussions on this would be beneficial before an application is submitted.

Affordable Housing

It is noted that the applicant is proposing to meet the policy requirement by delivering 30% affordable housing on the site. The 80 (social rented) / 20 (intermediate) split should be applied.

You will appreciate that the above is an informal opinion of a planning officer based on the information provided and does not constitute a formal determination under the Planning Acts

I trust that the above is of assistance

Yours faithfully

X *B.J. Haywood*

Signed by: Ben Haywood

Head of Development Services

APPENDIX A Urban Design Guidance for Glossopdale School Site

Context

The site is located in the northern area of Glossop and represents a substantial quarter within this character area of the town. The context of any development needs to understand the relationship to the town centre, the Norfolk Square Conservation Area and the Howard Town Mills area, and to the major open spaces of Howard Park and Manor Park in the northern part of Glossop.

The Glossop Design and Placemaking Strategy December 2011 provides an overall vision for Glossop 'to create: A vibrant and creative community providing an exceptional quality of life. To establish a reputation as a creative town.' Glossop has a mosaic of a number of different areas with a distinctive character such as: Norfolk Street, High Street, Old Glossop/Manor Road. The proximity of Howard Town and High Street in particular has implications for the success of the site. The development of the site needs to result in a distinctive character area in itself to add to this mosaic and build upon Glossop's desire to establish a creative community. Therefore the response cannot be a standard 'anywhere' housing estate response bearing no relationship to local context and character.

The site presently has little opportunity to reinforce connections yet it is central to the Old Town and very visible from the surrounding landscape. An appropriate design response is required based on:

- Context within Old Glossop area.
- Use of specific character references that are strong within Glossop such as curved corner buildings, strong building lines, enclosed streets.
- Establishment of an urban grain based on a hierarchy of development.
- Landscape framework, based on increasing biodiversity and well treed gardens and streets that reflect the character of north Glossop.
- A strong frontage to Talbot Road is essential to establishing identity and character especially at gateways into any new housing area.
- An appropriate high quality responsive contemporary design that is evolved from the context may be possible. This can use ecology and sustainability to enhance the schemes development credentials.

Accessibility

Existing vehicular access to the site is via the existing school driveway accesses off Talbot Road. There is a steep level change into the site and discussions with DCC Highways department early on in the layout design process is required.

The site is 0.5 miles from the town centre. However, to walk from the Talbot Road site entrance to the town centre will be between 15 and 20 minutes. It is therefore desirable that any developer explore creating new links especially to the Howard Town centre and new footpaths along Glossopdale Brook area which would greatly enhance the liveability of any housing development in this area.

Ideal walkway links would be to Fauvel Road and the junction with Spire Hollin. Developers should look at the possibility of obtaining access along one of the

boundaries of the side gardens of houses along the stretch of houses along Fauvel Road, at a point between houses 18 to 22, where there is potential to create a narrow 2 to 2.5m footpath. This would also provide an essential direct link to recreation facilities at Fauvel Road. Also, there is an opportunity to look at the potential of creating links from Spire Hollin in the street frontage around 18a and 20 Spire Hollin.

There are occasionally properties that come up for sale around the southern perimeter of the site and any opportunity to incorporate one of these into the development may provide an opportunity to integrate old and new buildings into a new gateway for the development.

Unfortunately options depend on discussions with private land owners and may not be able to be achieved. However, prospective developers should attempt to negotiate options for achieving new pedestrian access prior to a planning application being made.

The top of Fauvel Road Park close to the gazebo would benefit from a small pedestrian access which would increase accessibility to residents from the new development.

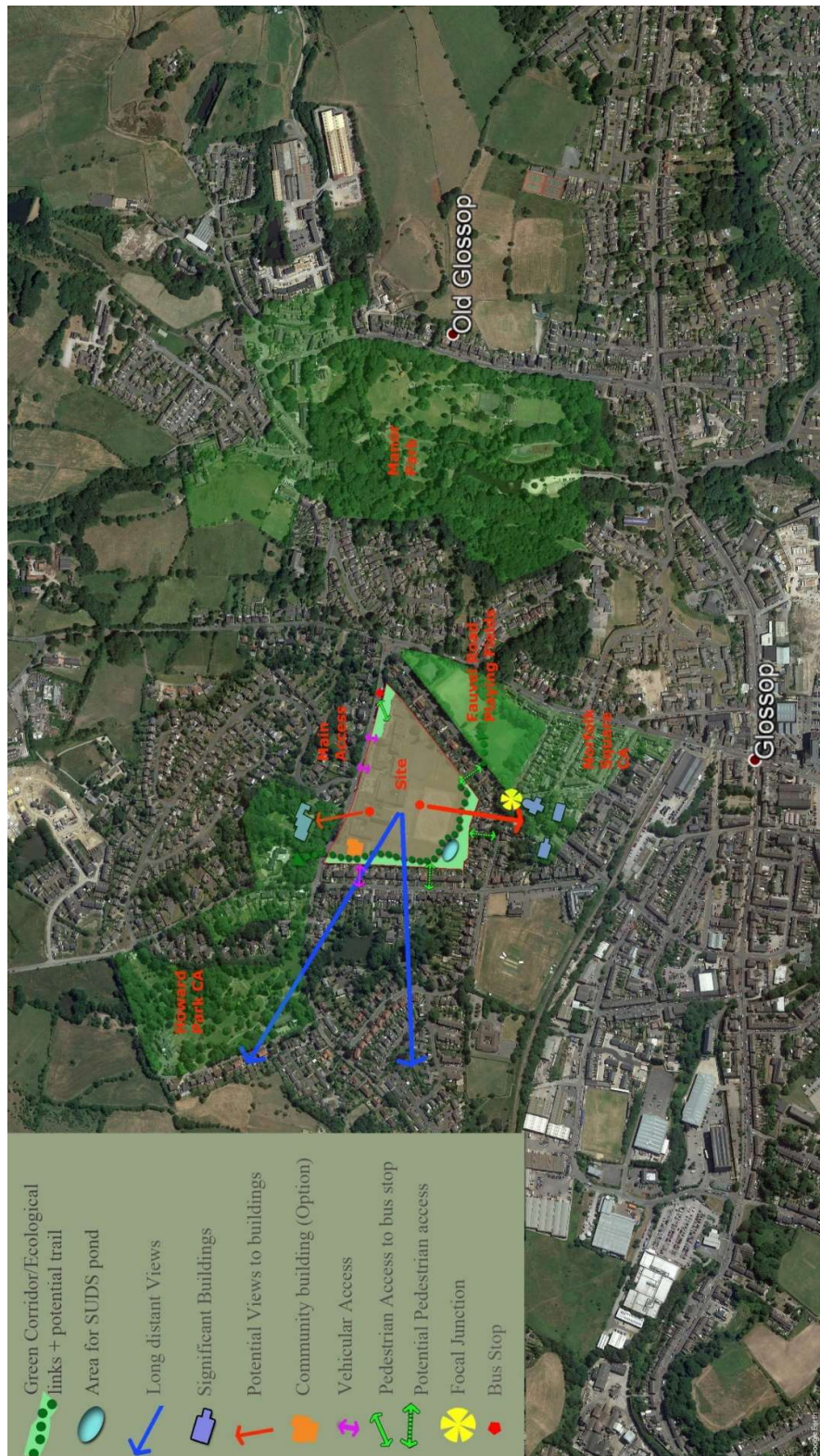
Layout

There is a pattern of development within the area of streets running mainly west to east, with clear building lines. New streets should respond to contour lines and be slightly sinuous with gentle drops in gradient. The site is currently characterised by level cut and fill platforms which should be gently graded to create a more gently sloping site with smaller platforms. This will also be informed by solar gain as the site is gentle and south facing and therefore elevations and gardens can make the most of this orientation.

The street layout should not be dominated by cars and parking. Parking standards are as per local plan standards, however, the layout should attempt to locate parking behind front elevations, and within the street, rather than on frontage driveways. A mix of front and side parking with occasional courtyard parking arrangements helps to reduce the visual dominance of parking.

The level drop from Talbot Road gives a distinct difference in height from one side of Talbot Road to high Edwardian Villas on the north side. Any proposals will need to explore the scale and relationship to the large detached Edwardian Villas opposite and along Talbot Road as these are prominent buildings. The frontage needs to create a relationship and an active frontage that has a street presence. This may require the development of three storeys along the frontage and the maintaining of low boundary hedges with occasional new native large boundary tree planting that will reinforce the street. Talbot Road is sufficiently wide and houses are well set back and elevated to the North to allow for these trees.

New entrances off Talbot Road need to be sensitively designed to not be obtrusive. In particular the existing bus-stop and pedestrian entrance into the site needs to be integrated into the development. There is a pleasant sloped wooded verge and walkway into the site that we would be looking to retain. (See plan below showing the wider site context).



Residential Amenity

In recognition of the location of the site, nestled within a residential area, any future development should comply with the Council's privacy standards as set out in the Residential Design Guide Supplementary Planning Document 2005.

It is important that the design of new residential development provides adequate privacy, security, sunlight and daylight to occupiers of both new and existing dwellings. As a guide, a distance of 21 metres between habitable room windows of adjacent properties will provide an acceptable level of amenity. Where changes in levels on site are evident or where taller buildings are present, these distances should increase by 1 metre for every 0.5 metre difference in height between the smaller to the taller building. Strict application of these standards can however restrict a creative response to site layout and frustrate designers. The Council is therefore open to applicants with a more flexible approach based upon design principles rather than standards.

The layout and format of windows will be important in establishing views, overlooking and privacy. Where buildings are located closer than 21 metres, the layout of windows and doors should avoid creating direct views from properties. Where new development is located close to existing homes, specific attention should focus on minimising issues of overshadowing as far as is practical.

Key principles are:

- Standards for separation distances are only a starting point for housing layout;
- The Council adopts a more flexible approach where high quality design can be demonstrated and where adequate amenity and privacy are evident;
- Fronts are the public face and backs more private areas. Fronts addressing fronts may therefore be positioned closer together than backs;
- Corners and topography need particular attention and careful design;
- Private and semi-private amenity space associated to properties should be located to the back of building frontages;
- The layout, size and finish of windows can help to preserve privacy in intimate scaled schemes;
- Measures to minimise noise between properties, particularly between party walls will be required;
- New designs should minimise overshadowing of existing and proposed properties and open spaces.

Significant buildings

Glossop was at the forefront of change in C19th industrialisation and new developments created a distinct identity. The area is located between two distinct conservation areas: Norfolk Square extension to the South and Howard Park Conservation Area to the North, which includes Talbot House opposite the site.

Norfolk Square Conservation Area includes a collection of listed buildings, such as Victoria Hall Library, St Luke Church and the Utilitarian Chapel along with houses around Lord Street, Fitzalan Street and Charles Street. These form a characterful group especially around the junctions of Fauvel Road, Spire Hollins, Lord Street and Talbot Street, close to the south east of the site. In particular the spires attached to Victoria Hall and Unitarian Church in Talbot Street are landmarks in the area that can be seen from within the site. Attempts should be made to define views to these spires as they are also a key orientation point within the town.

Other buildings of significance in the area are Spire Hollins House which is shown on the 1878 map, Talbot House and Glossop Hall. Victorian Architecture is very robust

and often dramatic in form and massing. Any new development should take note of distinct character forms from this period.

Views

Views both to and from the surrounding green hills are also a dominant feature of the town centre below. The town has a direct visual connection with the surrounding countryside from many streets and spaces.

Views out of the site should be considered. It is tempting to organise the site according to existing boundary alignments, however, with the surrounding hillsides it is possible to orientate buildings to give a sense of connection to the wider landscape with fenestration being larger on the side of more distant views of the Peaks to the north and the west. From these hillsides any development will be visible within the context of surrounding development and being long distance unlikely to have any impact, however, distinctly contrasting materials may be noticeable. Bearing in mind that this is north Glossop which is well treed we would expect materials and roof form to blend in.

Character

The design should be informed by these character references:

- Mills, towers and Spires feature prominently in the townscape.
- Buildings, are traditionally stepped in response to level changes.
- Houses are mainly 2 storeys.
- Fauvel Road is a key road link to the town centre and railway station.
- Landmark buildings: St Luke's Church and Victoria Hall.
- Well enclosed streets. A rectilinear layout, consistent building lines and well defined fronts, backs and entrances to buildings, all reinforce a traditional townscape.
- Limited use of number of building materials: local millstone grit and Welsh Blue slate predominate.

Standard designs duplicated and brought in from elsewhere and 'anywhere' type of development - erodes the local sense of place. These would not be acceptable in this area.

(References: Residential Design Guide Supplementary Planning Document 2005 & Glossop Conservation Area Character Appraisal – SPD March 2006).

There are a variety of house styles though terraces predominate from stone worker cottages predominating towards the town centre, with grander homes towards the northern slopes. Houses are mainly laid out in grid iron street pattern leading to looser pattern on the northern hills slopes.

Alexandra Villa to north along Talbot Road is on the 1845 OS Map, along with Talbot House and its parkland setting. Spire Hollins House in Spire Hollin Road and many of the trees along Spire Hollin also date from this period. It is clear that the parkland setting is a key characteristic in the area.

The houses along Fauvel Road and North Road are predominantly post war 1940's semi-detached with red brick, grey slate roofs and pebble dash render, hipped roofs

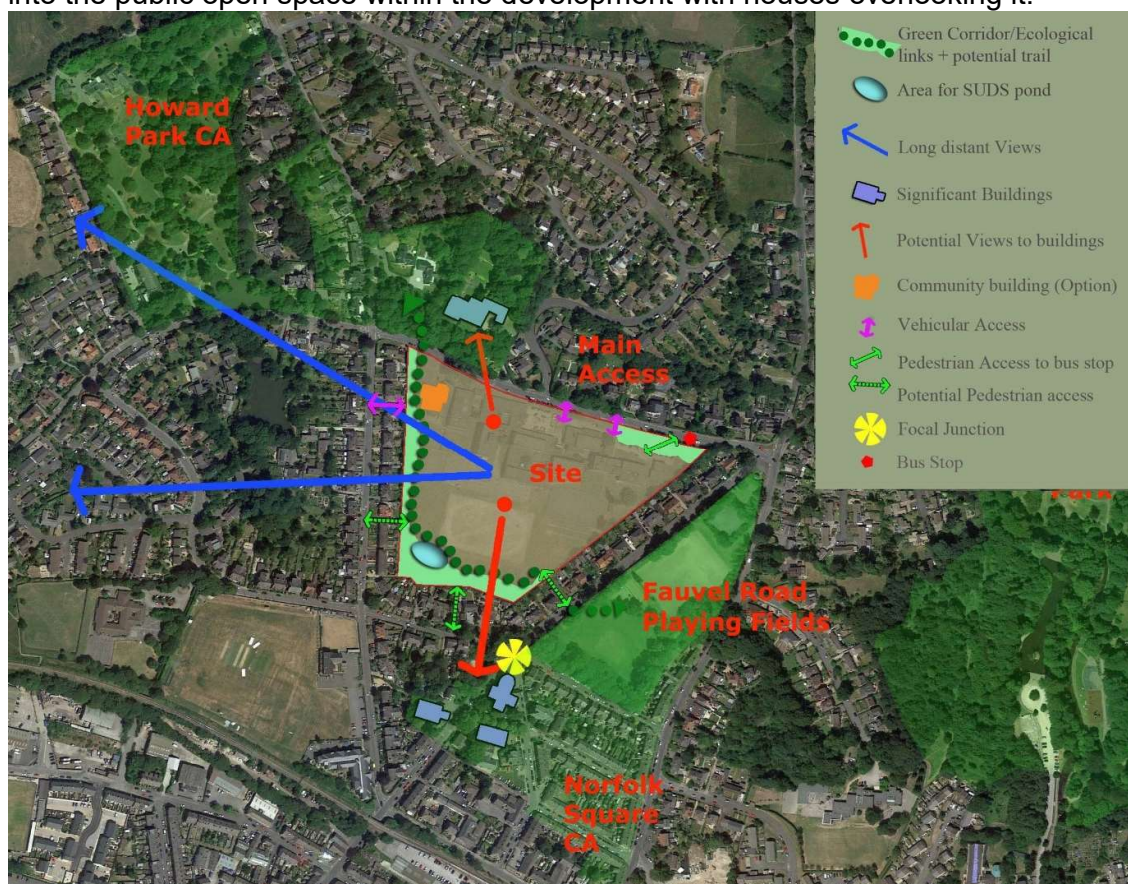
and bay windows with arched doorways, traditional of the period with generous side gardens and rear gardens. The rear gardens and fences offer little opportunity to provide a relationship or character to the site. However, there may be an opportunity to look at form and scale of those houses and incorporate some of these proportions into any new housing development.

Three storey houses fronting onto Talbot Road would more or less follow the building line of the existing school building.

Placemaking

The demolition of this large redundant school site allows for the possibility to create a new narrative for the future of Glossop's northern suburbs. This should be based on community engagement and we suggest an Open Design Review panel to help ensure high standards of design and inclusiveness.

Entrances to the residential development, focal areas within the design and successful integration of SUDs areas within the layout all add to the sense of placemaking. The natural place for a SUDS pond is in the south-west corner but this should be integrated into the public open space within the development with houses overlooking it.



Landscape

Glossop is located in the Dark Peak Landscape Character Area and surrounded by Settled Valley Pastures. A coherent landscape needs to be maintained and therefore the landscape needs to be designed to reflect this location using advice from The Landscape Character of Derbyshire 2014.

The surrounding area is well treed and characteristic of Old Glossop which developed from manorial park lands. Any residential development should be well wooded to link with other parts of northern Glossop. A band of trees should be incorporated to create green links and give biodiversity gain. This green band should link throughout the design from Howard Park in the north west of Talbot Road and Talbot House across from the site to the north with TPO'd trees at Spire Hollins House and the frontage of adjacent properties to reinforce green framework and biodiversity matrix. This will link to Fauvel Road playing fields – woodland north of the Duke of Norfolk Primary School and across to Manor Park. A new Urban Footpath links from North West to South East should also be achieved through the development where possible.

Existing trees within the site need to be assessed and maintained where possible.

The tree lined verge within the site and walkway through to the pedestrian gate and bus stop should be maintained. There are significant mature trees and it will be important not to affect these trees or verge. The footpath should be maintained and incorporated into any future design.

Sustainability

Any new development should take account of the challenges of climate change and there is a potential for it to be characterised as an eco-development. There is potential for solar gain by using south facing roof slopes due to the south facing nature of the slope of the site, use of recycling systems for water and possibility of using SUDs throughout the external works in a creative way.

For a truly sustainable development following the principles of the BRE AAM (Building Research Establishment Environmental Assessment Method) may be used. This will build in sustainable factors regarding waste and construction materials etc.

The developer should also use Building for Life (BfL 12) 12 questions to guide design the proposed housing development to create an attractive, functional and sustainable place.

It is also recommended that The Lifetime Homes Design Guide be used – design requirements for accessible homes. Designed with flexibility to respond to future social, technological and economic needs.

The use of electric cars should be encouraged by provision of charging points.

Urban Design Guidance

Any development should take into account the following design Guidance:

- Building for Life (BfL 12), third edition, January 2015. Design Council, the Home Builders Federation and Design for Homes.
- National Design Guide, October 2019. MHCLG. The national design guide sets out the characteristics of well-designed places and demonstrates what good design means in practice.
- Living With Beauty: Promoting Health, Well-being and Sustainable Growth. January 2020. The report of the Building Better, Building Beautiful Commission, published by MHCLG.

- Sport England's Active Design Document -<https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design>

APPENDIX B Comments from Sport England

Thank you for consulting Sport England on the above pre-application proposal.

Sport England – Statutory Role and Policy

Part of the proposed site constitutes playing field as defined in the National Planning Policy Framework (NPPF) and the Town and Country Planning (Development Management Procedure) (England) Order 2015 (2015 Order). As such, Sport England advises that this proposal would require statutory consultation under the terms of the 2015 Order, at the formal planning application stage.

Sport England considers proposals affecting playing fields in light of the NPPF (in particular paragraph 99 which protects playing fields from development) and against its own playing fields policy, which is presented within its 'Playing Fields Policy and Guidance Document:' www.sportengland.org/playingfieldspolicy

Sport England's policy is to oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of all/part of a playing field. Exceptions to this policy are contained within the Playing Fields Policy Document and are listed below.

Sport England Policy Exceptions

E1 A robust and up to date assessment has demonstrated, to the satisfaction of Sport England, that there is an excess of playing field provision in the catchment, which will remain the case should the development be permitted, and the site has no special significance to the interests of sport.

E2 The proposed development is for ancillary facilities supporting the principal use of the site as a playing field, and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use.

E3 The proposed development affects only land incapable of forming part of a playing pitch and does not:

- reduce the size of any playing pitch;
- result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas);
- reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain their quality;
- result in the loss of other sporting provision or ancillary facilities on the site; or
- prejudice the use of any remaining areas of playing field on the site.

E4 The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field:

- of equivalent or better quality, and
- of equivalent or greater quantity, and
- in a suitable location, and
- subject to equivalent or better accessibility and management arrangements.

E5 The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.

Policy CF 4 (Open Space, Sports and Recreation Facilities) in the High Peak Local Plan (2016) also seeks to protect, maintain and where possible enhance existing open spaces, sport and recreational buildings and land including playing fields in order to ensure their continued contribution to the health and wellbeing of local communities. This policy is consistent with the advice in the NPPF that existing open space, sports and recreational buildings and land, including playing fields need to be protected from development unless a specified justification applies.

The High Peak Borough Council Playing Pitch Strategy and Action Plan (2018) (PPS) provides the evidence base as required by paragraphs 98 and 99 of the NPPF

The Proposal and Assessment against Sport England Policy/NPPF/Development Plan Policy

The proposal relates to a residential scheme grouped into development parcels around two access points into Talbot Road. The illustrative masterplan includes two LEAP areas along with open space.

The proposed development scheme would lead to the loss of the whole of the playing field land as shown in the Google Earth image (2020) below. This playing field land exceeds some 2.6 hectares of land. The High Peak PPS includes text on the pre-application site. The PPS states that the site is due to close in 2017/2018 and that whilst the site does not have any formal playing pitches it does have playing field land and an old redgra surface. The recommended actions for the site in the PPS are to ensure that any developments on the site adhere to NPPF 74 (now paragraph 99) and local planning policy.



The loss of this playing field therefore needs to be considered against the exceptions in Sport England's policy which accord with the specified justifications included in paragraph 99 of the NPPF and Development Plan Policy CF 4 which all seek to protect playing fields from development.

Of Sport England's playing field policy's five exceptions – two could potentially cover the proposed development:

Exception 1:

Exception 1 allows the loss of playing field where a robust and up-to-date assessment has demonstrated, to the satisfaction of Sport England, that there is an excess of playing field provision in the catchment, which would remain the case should the development be permitted.

The PPS confirms that there is little spare capacity for existing and the growth of football in the area and that there is an identified shortfall of youth grass pitches and full size 3G pitches across the High Peak area. A shortfall in rugby union pitches is also identified. As such, the PPS does not show a surplus of playing field provision in the area to meet exception E1 of Sport England's policy exceptions or paragraph 99 a) of the NPPF.

Exception 4:

Exception 4 of the Sport England's Playing Fields Policy states:

'The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field:

- of equivalent or better quality, and
- of equivalent or greater quantity, and
- in a suitable location, and
- subject to equivalent or better accessibility and management arrangements.'

It is therefore necessary to assess the existing and proposed playing fields against the above policy to determine whether the proposal would meet Exception 4. To meet E4, replacement must represent a genuine replacement i.e. creation of a new playing field. Improvements to existing playing field do not represent a genuine replacement because the quantity element of the exception has not been addressed only the quality element. The quantity element can be addressed by bringing into use areas of an existing playing field that are currently incapable of supporting a pitch or pitches without significant works, or creating new playing field on land that is not currently playing field. These areas must be assessed by a suitably qualified sports turf specialist/agronomist to provide the evidence required to show these areas will represent a genuine replacement of playing field.

From the information submitted with the planning enquiry there is no reference to the playing field being replaced. As such, the proposal would be contrary to exception 4 of the Sport England's Playing Fields Policy and paragraph 99 b) of the NPPF.

Additional demand for sports facilities

The housing proposal also needs to be assessed against Section 8 of the NPPF which advises that any new sports facility needs arising as a result of a development should be met and Sport England's planning objectives to protect, enhance and provide opportunities for sport.

The additional population generated by this housing proposal would create additional demand for sports facilities. The existing provision within an area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. The PPS and Facilities Planning Models undertaken in High Peak provide data on the existing facilities in the area. Sport England can assist in providing

calculations on the demand likely to be generated on outdoor sports facilities and indoor sport facilities in the area as a result of this housing development.

Conclusion

In view of the above, the current proposal would not meet any of the exceptions in Sport England's Playing Field Policy or any of the specified justifications in Paragraph 99 of the NPPF or Policy CF4 in the High Peak Local Plan (2016) in that the proposal would lead to the loss of playing field in an area where there is a deficiency in the provision of playing fields. This being the case, Sport England is likely to raise an objection to this proposal at the planning application stage as the proposal would be contrary to our Planning Fields Policy and to paragraph 99 of the NPPF. If the local planning authority were minded to grant planning permission for the proposal, contrary to Sport England's objection, then in accordance with The Town and Country Planning (Consultation) (England) Direction 2021, the application would have to be referred to the Secretary of State via the Planning Casework Unit.

The pre-application enquiry also fails to demonstrate how the additional sports needs generated by the development would be met.

Possible Resolution

In order to avoid an objection from Sport England the following areas should be investigated:

- Replacement playing field

Provide an equivalent or greater amount of playing field as existing and of a quality which is equivalent or better than the existing playing field to be lost in a suitable location.

In order to meet the qualitative aspect of exception 4 the area of new playing field must be of at least the same quality. Sport England would seek the imposition of conditions relating to the qualitative aspect when the application was formally submitted which is explained further in the link below:

https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/equivalent-qualityassessment-of-playing-fields-briefing-note.pdf?otW_LLi0FixRqExiAuzHXdyKW9mHvcr

To ensure that the quality of the playing field is equivalent or better, Sport England would expect its model planning conditions 10a and 10b to be attached to the decision notice

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport?section=planning_applications

- Sports Facilities Audit

The proposal should be accompanied by an up-to-date Sports Facilities Audit for Glossop which is informed by a robust evidence base to ensure that the sports facility needs arising as a result of the development are met either on-site and/or off-site.

Informative:

It should be noted that consent under Section 77 of the Schools Standards and Framework Act does not necessarily mean subsequent planning approval will be granted. Therefore, any application for planning permission must meet the requirements of the relevant policy, in this case paragraph 99 of the NPPF, Local Plan Policy and Sport England policy.

Please contact me if you wish to discuss the above.

Yours sincerely,

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